

SUPPLEMENTARY INFORMATION & SUPPORTING STATEMENT

1. Site Details

Site Name:	Sidney Boyd Court	Site Address:	15-64 Sidney Boyd Court West End Lane London NW6 4QZ
National Grid Reference:	525421, 184169		
Site Ref Number:	CAM0160	Site Type: ¹	Macro

1.1 Background

UK Broadband Ltd (UKB) is a wholly owned subsidiary of PCCW, the largest telecommunications operator in Hong Kong. Since 2003 UKB has pioneered advanced wireless services and solutions in support of various PCCW interests both in Hong Kong and across the world.

In the UK, UKB Limited is a designated Electronic Communications Code Network Operator and is the largest commercial owner of the national radio spectrum for 4th Generation Wireless Technology (4G) services. As a designated Electronic Communications Code Network Operator, UKB operates in accordance with the provisions of the Electronic Communications Code and the Communications Act 2003, which provide the statutory and regulatory basis for the operation of UKB's network.

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: Not aware a register exists.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		

¹ Macro or Micro

Annual Area Wide Information to local planning authority

Date of information submission to local planning authority:	13 October 2015
Name of Contact:	Neil Storer & Gavin Polkinghorn
Summary of any issues raised:	Not aware of any issues raised.

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	16 September 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 comments have been received.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:	<p>Whilst UK Broadband is not a telecoms operator, it does follow the spirit of the Code of best Practice on Mobile Network Development in England 2013, thus the site was assessed against the Traffic Light Model and assigned an amber rating.</p> <p>Consultation was therefore undertaken with local stakeholders. Letters were sent by email on 16 September 2016 to the Swiss Cottage Ward Councillors – Cllrs. Freeman, Marshall & Williams, and to the Member of Parliament for Hampstead and Kilburn, Tulip Siddiq.</p>		
Summary of outcome/main issues raised:	No comments have been received.		

School/College

<p>Location of site in relation to school/college: There are a number of educational establishments close to the proposed site:</p> <ul style="list-style-type: none"> • Rainbow Montessori School, Woodchurch Road; • St Eugene de Mazonod Roman Catholic Primary School, Mazonod Avenue; • St Mary's Kilburn Church of England Primary School, Quex Road; • Kingsgate Primary School, Kingsgate Road; • West Hampstead Day Nursery, Woodchurch Road; • CCN Acol Nursery, Acol Road; • Kingsgate Play Centre, Kingsgate Primary School, Kingsgate Road; and • The Learning Tree Nursery, Methodist Church Hall, Quex Road.
<p>Outline of consultation carried out with school/college: Consultation was undertaken via email on 16 September 2016.</p>
<p>Summary of outcome/main issues raised: No comments have been received.</p>

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
<p>Details of response: N/A – full planning application.</p>		

Developer's Notice

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

3. Proposed Development

The proposed site:
The host building is located on the eastern side of West End Lane, between its junctions with Woodchurch Road to the north and Acol Road to the south. It is a six-storey residential building. The building is located within South Hampstead Conservation Area. There is an existing telecommunications installation on the roof of the building.
The area is predominantly residential in character. Development consists mainly of flats, however there are some houses. There are significant trees in the area which would provide a degree of screening to the proposed equipment.

Type of Structure (e.g. tower, mast, etc):	Pole mounted antennas
Description:	The installation of 3 no. pole mounted antennas and 3 no. 300mm diameter dish antennas, the installation of 2 no. equipment cabinets and development ancillary thereto.
Overall Height:	21 metres to top of antennas
Height of existing building (where applicable):	20 metres to top of plantroom
Proposed Equipment Housings:	
Length:	2 x 0.6m
Width:	2 x 0.48m
Height:	2 x 0.7m
Materials:	
Tower/mast etc – type of material and external colour:	N/A
Equipment housing – type of material and external colour:	Steel coloured 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:
<ol style="list-style-type: none"> 1) Utilising an existing telecommunications site to keep the overall number of sites in the area to a minimum. The alternative would be to propose a different location which, it is considered, would result in a greater overall impact on the area. 2) Keeping the amount of equipment to a minimum due to the location of the site within a Conservation Area. Only three antennas and dishes, and two small ancillary equipment cabinets, are required. The antenna height has been kept to a height below that of the existing antennas on the building, and the small cabinets will be located centrally on the roof. No additional handrailing will be needed on the roof. These elements of the design ensure the impact of the development is kept to a minimum;

- 3) Utilising the existing trees in the area to provide a degree of screening to the proposed development. Depending on viewpoint there would be a reduction in impact of the proposed equipment, both from trees close to the site and other buildings.

It is considered the proposed equipment is appropriately located. It has been possible to devise a scheme which has a minimal visual impact. The design would result in a less intrusive facility than other designs, 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

All UKB sites are designed to be fully compliant with the precautionary guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP).

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, UK Broadband (“UKB”) 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 UKB’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.

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

The UKB Group provides wireless services and solutions to the telecommunications industry, service providers, channel partners and the public sector within the U.K. UKB currently provides wireless services from across a number of sites using a combination of macro installations on tall buildings, ground based “streetworks” sites and small-scale wireless access points attached to street furniture such as lamp-posts and CCTV poles.

UKB is currently focused on providing 4G network deployment across London and other major cities in the UK to help with the rapidly growing wireless data demand. The proposed 4G network will provide the ability to deploy multiple 20 MHz channels, within UKB’s licensed 3400-3800 MHz spectrum, that UKB considers to be the underlying requirement for capacity in 4G wholesale networks.

UKB’s 4G service is based on a network of radio base stations, which typically consist of a set of antennas and one or more small equipment cabinets. These are connected to the wider network either by transmission dishes or fibre-optic cables. In this case three antennas, two small equipment cabinets and three transmission dishes are proposed.

The proposed 4G network will offer high capacity, secure, wireless, service guarantee levels needed to support initiatives including digital and social inclusion, mobile working, re-deployable CCTV security, emergency services data communications, community healthcare provision, education, and 4G to Wi-Fi services on public transport. UKB has also commenced the early stages of building the UK’s first 4G (IMT Advanced) service. This site is specifically required by UK Broadband to provide 4G coverage to this area of South Hampstead.

UKB is also supportive of the government’s Digital Britain initiative to ensure that everyone in the country has access to affordable broadband services. UKB’s substantial licensed spectrum holdings and 4G wireless solutions are specifically designed to solve ‘hot-spot’ needs and thereby help to achieve the Government’s Universal Service Commitment and super-fast broadband objectives.

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	St Mary's Church Junction of Abbey Road & Priory Road London NW6 4SN	525680, 184013	This is a Grade II listed church. It is considered use of this building could harm heritage assets in the area. An antenna height could not be achieved to provide coverage comparable with the preferred option. The option has therefore been discounted.
ETS	Snowman House Abbey Road London NW6 4DN	525764, 183957	This a building which already accommodates telecommunications equipment. The site is too far from the search area to provide coverage to the target area.
RT	St James Church Junction of Sherriff Road & West End Lane London NW6 2AP	525476, 184538	This is a Grade II listed church. It is considered use of this building could harm heritage assets in the area. An antenna height could not be achieved to provide coverage comparable with the preferred option. The option has therefore been discounted.
GF	Streetworks Site West End Lane London NW6 4QZ	525417, 184200	A streetworks site was considered on the footpath on the eastern side of West End Lane. It would not be possible to replicate the antenna height achieved by utilising Sidney Boyd Court and it is considered an installation on the footpath would have a greater overall impact.
RT	Cecil Court Junction of Acol Road & Priory Road London NW6 3AP	525642, 184159	This site was considered, however was not considered as suitable as the preferred option. It is a slightly lower building and is not an existing telecommunications site.
RT	West End Court Junction of Greencroft Gardens & Priory Rd London NW6 3NU	525696, 184265	This site was considered, however was not considered as suitable as the preferred option. It is a slightly lower building and is not an existing telecommunications site.
RT	Kings Gardens West End Lane London NW6 4PU	525403, 1884091	These buildings are well sites and have a good height, however the structure does not lend itself to accommodating telecommunications equipment. Buildings

			have pitched roofs. It is not considered as suitable as the preferred option.
RT	Church of the Sacred Heart Mazenod Avenue London NW6 4LS	525357, 184001	The building is not suitable. There is nowhere on the building to accommodate the required equipment.

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

N/A

Additional relevant information (planning policy and material considerations):

Siting & Appearance

Only a limited number of suitable options have been identified. A sequential approach is taken when searching for a site for a new installation. Firstly, existing telecommunications installations are sought, then existing buildings or structures, and then finally greenfield options are considered if the former are not available.

In this instance a suitable building which currently hosts an installation has been identified, therefore negating the need to move the search on to new buildings or freestanding sites. This has the benefit of limiting the overall number of telecommunications sites in the area, hence minimising impact.

It is considered that the proposed location is the least visually intrusive site and design available to the applicant which also ensures coverage can be provided.

The selected siting, utilising an existing rooftop telecommunications site, is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding visual harm to the setting.

The design of the base station is very simple, with three pole-mounted antennas and three dishes located on the roof of the building. The cabinets would be located centrally on the roof and are small in scale. Overall this is considered to be the optimum form of development within this setting.

It is acknowledged that clear views of the equipment will be achievable from points in the area, particularly along West End Lane. It is noted that there is existing equipment on the roof, and that views of the building would be obscured by other buildings and trees, dependant on viewpoint. The amount and scale of the proposed equipment is less than the existing equipment on the roof. No additional handrailing is required. This additional equipment would appear subservient to the existing equipment. It is important to note at this juncture that the fact that something is visible does not mean that it is necessarily harmful. It is considered that

the proposal, which would be seen within the context of existing telecommunications equipment on the roof of the building, would not be seen as having a significant additional impact on the appearance of the building. It is submitted that the appropriate siting and high standard of design will result in a proposal which is highly suitable to its setting. Consequently, there would be no significant or negative impact upon visual amenity, nor cause harm to the character or appearance of the conservation area.

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the limited harm it may impose on the street scene being balanced by provision of 4G services to the area in the public interest, and the lack of suitable available alternatives. As such, equilibrium will be achieved between technical requirements and environmental impact.

Planning Context

National Guidance

National Planning Policy Framework (2012)

The NPPF, which came into force on 27 March 2012, has replaced PPG8 in terms of national policy specifically relating to electronic communications development.

Paragraph 14 states 'At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking:

'For decision taking this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

Unless material considerations indicate otherwise.'

Included within the core planning principles to be taken into account in paragraph 17 are the following relevant points:

- *planning 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. ...; (our emphasis)*
- *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*

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

Paragraph 21 advises LPA's to '*plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;*' and paragraph 29 recognises that '*Smarter use of technologies can reduce the need to travel.*' The installation proposed in this application will enable the Applicant to provide enhanced high quality coverage to the surrounding area, forming part of a network of high technology.

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.*'

It is considered that UKB's proposed installation, which is an integral part of its 4G network, is precisely the type of high-speed digital broadband infrastructure that the government is seeking to support as part of the strong presumption in favour of sustainable development. In addition, it is considered there would be a minimal impact on heritage assets in the area, and that the impact would be outweighed by the benefits of the proposal.

Regional Guidance

London Plan (2015)

Further alterations were adopted to the London Plan in March 2015. The London Plan continues to set out the spatial development strategy for Greater London, in which it discusses the importance of ensuring that robust infrastructures are in place so as to support better connectivity and economic prosperity. Indeed the Mayor wishes to encourage broad-based growth and continues to support the telecommunications industry towards playing their part in a thriving, resilient and diverse capital city. A range of overarching policies from the London Plan are relevant to telecommunications development, whereby the benefits of mobile connectivity should be seen as an important material consideration, in contributing to the places and spaces in which Londoners live, work and visit. In this respect it is clear that telecommunication development is an integral component towards the delivery of the Mayor's vision and objectives as set out in the London Plan.

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 UKB network is 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. Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform in allowing the Applicant to provide quality 4G coverage to the surrounding area.

London Infrastructure Plan 2015

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 documents, 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 Plan states 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 UKB network is 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 shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

Local Level Policy Guidance

The Development Plan

Section 70 of the Town and Country Planning Act 1990 requires planning applications 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 to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Most relevant to the proposal are considered to be the Council's Core Strategy (adopted November 2010) and the Development Policies and Site Allocations documents (adopted November 2010).

There are no policies relating directly to telecommunications development within the Council's policy documents. General policies 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. The equipment is minimal in scale and would appear subservient to the building and existing telecommunications equipment. It would be well screened by existing buildings and trees in the area. It is considered it would therefore preserve the character of the conservation area. The minimal impact of the development would be outweighed by the public benefits of the proposal.

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.

Social and Economic Context

In respect of socio-economic factors, it is a key objective of government to facilitate the growth of new communications networks, such as 4G wireless and high-speed broadband technologies, due to their importance in providing fast, reliable and cost effective services that can support the economy and help to meet sustainable development objectives.

The government is also keen to ensure that people and organisations have a choice as to who provides their telecommunications service, a wider range of services from which to choose and equitable access to the latest technologies as they become available.

These objectives were expressed in the Digital Britain report published by the Government's Department for Culture Media and Sport in June 2009. This report restates the Government's ambition to secure the UK's position as one of the World's leading digital knowledge economies and sets out a number of objectives to secure this vision. Paragraph 18 of the Executive Summary of the report states that:

“18. We are at a tipping point in relation to the online world. It is moving from conferring advantage on those who are in it to conferring active disadvantage on those who are without, whether in children's homework, access to keep up with their peers, to offers and discounts, lower utility bills, access to information and access to public services. Despite that increasing disadvantage there are several obstacles facing those that are off-line: availability, affordability, capability and relevance.”

