

Our ref. 14979/800/VP

Date: 15 February 2017

Chief Planning Officer  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

[gva.co.uk](http://gva.co.uk)

**Submitted via the Planning Portal**

Dear Sir or Madam,

**PLANNING APPLICATION FOR THE UPGRADE OF AN EXISTING TELECOMMUNICATIONS SITE, COMPRISING THE RELOCATION OF THE EXISTING ANTENNA, TO BE INSTALLED ON A NEW POLE MOUNT, THE INSTALLATION OF 1NO. CABINET, AND ASSOCIATED DEVELOPMENT, AT KT AUTO SERVICES, 107E BARTHOLOMEW ROAD, KENTISH TOWN, LONDON, NW5 2AS**

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

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

The development consists of:

*"The relocation of the existing antenna, to be installed on a new pole mount, the installation of an OMB cabinet, measuring 430 x 240 x 600mm, and associated development."*

Enclosed is the following:

- 1 cheque for £385 made payable to London Borough of Camden
- Drawings no. CMN086 - 01,02,03,04,05,06,10,13 Issue A7
- Application forms
- ICNIRP Certificate
- Planning Statement (including design and access statement)
- ESN Briefing Note

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

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Birmingham Bristol Cardiff  
Dublin Edinburgh Glasgow  
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Yours sincerely,

A handwritten signature in black ink that reads "GVA Grimley". The letters are cursive and fluid, with the "G" and "V" being particularly prominent.

GVA Grimley Ltd.  
International Property Advisors

## **1. DESIGN AND ACCESS STATEMENT**

In May 2006 changes were introduced to the planning application process. These changes are set out in Government Circular 01/2006 '*Guidance on Changes to the Development Control System*'. Section 3 states the requirement for design and access statements to accompany applications for certain types of permission and consent.

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

### **1.1. HISTORY & BACKGROUND**

Everything Everywhere is a 50-50 joint venture between Deutsche Telekom and France Télécom and was formed in 2010 through the merger of the T-Mobile (UK) and Orange U.K. businesses.

On 3 September 2010, Everything Everywhere announced that Orange would join Mobile Broadband Network Ltd (MBNL), the joint venture management company formed in December 2007 between T-Mobile UK Ltd and Hutchison 3G UK Ltd (H3G UK).

In 2016, Everything Everywhere were chosen to work in conjunction with the Home Office to deliver the Emergency Services Network (ESN), which will deliver a smarter, better and cheaper communications capability.

This application upgrades the existing equipment.

### **1.2. DESIGN**

#### **1.2.1. The proposal**

The proposal is for the upgrade of the existing telecommunications site at KT Auto Services, 107E Bartholomew Road, Kentish Town, London, NW5 2AS. The proposed work comprises the relocation of the existing antenna, to be installed on a new pole mount, the installation of an OMB cabinet, measuring 430 x 240 x 600mm, and associated development.

The site is located within Bartholomew Estate Conservation Area. As the antenna is located on a building measuring less than 15 metres in height, and will be located within 20 metres of a Highway, a full planning application is required.

#### **1.2.2. Design Considerations**

The proposal is for the upgrade of an existing site. It is proposed to relocate the existing antenna and locate it on a new pole mount. The height of the antenna will therefore be increased – existing centre line of antenna 2.7 metres, proposed centre line of antenna 5.2 metres. The proposed height increase is required due to ICNIRP constraints.

It is also proposed to install an OMB cabinet, measuring 430 x 240 x 600mm. The cabinet will be installed on new framework on the building.

It is not considered that the proposal will have a detrimental impact on the character of the Conservation Area or the wider local area, and permission should not be withheld.

#### **1.2.3. Planning Policy Considerations**

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

#### 1.2.4. Local Policy

Camden's Core Strategy was adopted in November 2010. It contains **Policy CS14 – Promoting high quality places and conserving our heritage** which is relevant in the determination of this application.

Camden's Development Policies document was adopted in November 2010. It contains **Policy DP25 – Conserving Camden's heritage** which is relevant in the determination of this application.

There are no policies relating directly to telecommunications development within the Council's policy documents. General policies of relevance include **Policy DP24** of the Development Policies document (**Securing High Quality Design**) which requires a high standard of development.

In relation to the above policies, the proposal is for the upgrade of an existing site, and utilises the existing equipment where possible. The existing antenna will be relocated to a higher level on a new pole, to comply with ICNIRP guidelines. The additional cabinet is small. It is not considered that the proposal will have a detrimental impact on the character of the Conservation Area, or on the wider local area.

#### 1.2.5. National Policy

##### **National Planning Policy Framework**

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

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

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

**Section 5 – Supporting high quality communication infrastructure**

**Section 7 – Requiring good design**

**Section 11 – Conserving and enhancing the natural environment**

In relation to the above policies, it is not considered that the proposal will have a detrimental impact on the area.

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

#### 1.2.6. Site Need and Identification

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

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

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

**Quality** - In order to ensure coverage within buildings such as homes, shops, offices etc. the radio signal has to be of sufficient strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, some less than 1 km apart.

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

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

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

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

### **1.2.7. Health and Safety**

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

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

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

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

In particular, AGNIR has stated that exposure levels in the vicinity of mobile phone base stations are extremely low and the evidence indicates that they are unlikely to pose a health risk.

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

### **1.3. ACCESS**

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

## **2. CONCLUSION**

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

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