

<b>SUPPLEMENTARY INFORMATION AND TELECOMMUNICATIONS STATEMENT</b>
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### Background

A site at Linton House, 39-51 Highgate Road, Kentish Town, London, NW5 1RS was removed due to redevelopment works taking place and therefore it was necessary to install a temporary site under emergency planning powers at 379 Kentish Town Road. The application is for the permanent retention of the temporary site to ensure that a sufficient level of coverage continues to be met in the area.

#### 1. Site Details

Site Name:	379 Kentish Town Road	Site Address:	379 Kentish Town Road, London, NW5 2TJ
National Grid Reference:	528968/185261		
Site Ref Number:	76052	Site Type: <sup>1</sup>	Macro

#### 2. Pre Application Check List

##### Site Selection

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	No	
If no explain why: Camden do not have a mast register – however, telecoms history in the area was investigated.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why:		

##### Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	10/05/2018
Name of contact:	
Summary of outcome/Main issues raised: A letter was sent to the local planning authority informing them of our intention to submit an application to retain the equipment as a permanent installation. No response has been received to date.	

<sup>1</sup> Macro or Micro

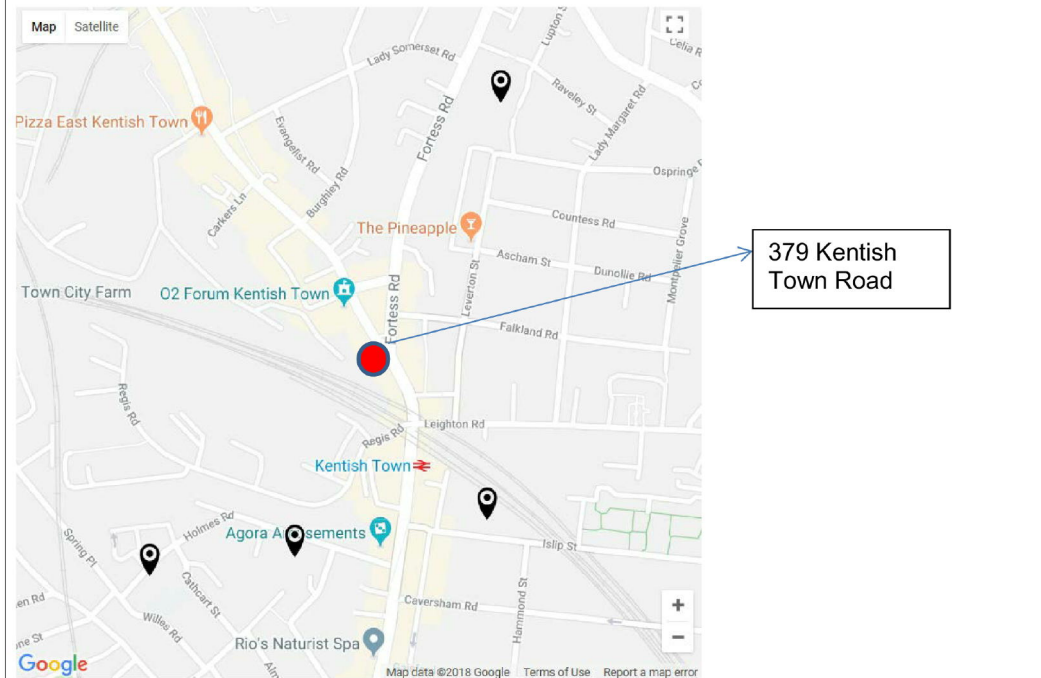
## Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	<b>Green</b>
Outline of consultation carried out:			
<p>The application is for the retention of existing equipment, which has been in situ for 18 months in a mostly commercial area with no concerns raised as far as the applicants are aware. Given this, and given the pending end of the 18 month emergency period granted under Part 16 of the GPDO 2015 as amended, the applicants wrote to the following parties to inform them that an application to make the installation permanent has been submitted:</p> <p>Councillors Georgia Gould, Jenny Headlam-Wells, Meric Apak Keir Starmer MP</p>			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
None received to date. Any responses received will be forwarded to the LPA.			

## School/College

Location of site in relation to school/college (include name of school/college):

The gov.uk School Search tool was used and shows that there are no schools within 250 metres of the site.



Outline of consultation carried out with school/college (include evidence of consultation): N/A
Summary of outcome/main issues raised (include copies of main correspondence): N/A

**Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation**

Will the structure be within 3km of an aerodrome or airfield?		N/A
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		N/A
Details of response: N/A → this application is a full planning application and these are only required for prior approval applications.		

**Developer's Notice**

Copy of Developer's Notice enclosed?		No
Date served:	This is a full planning application. Article 13 notice served 10/05/2018	

### 3. Proposed Development

The proposed site:
379 Kentish Town Road is located close to the junction of Fortess Road/Highgate Road in the London Borough of Camden. The site is within a mixed use retail/commercial/residential area close to Kentish Town Underground Station.

Enclose map showing the cell centre and adjoining cells if appropriate:
Please see enclosed coverage plots showing coverage with and without the old NTQ site at Linton House, 39-51 Highgate Road, and with and without the existing equipment at Kentish Town Road.

Type of Structure (e.g. tower, mast, etc):	
Description:	
<p>¶The permanent retention of 6No. antennas and equipment housing located on the rooftop, 1No. electrical meter cabinet located at ground level, and ancillary development thereto.¶</p> <p>Flatpack rack → 600 x 600 x 1300mm          JSC → 600 x 600 x 1670mm          CSC → 660 x 800 x 1770mm          Flexi BTS → 560 x 490 x 625mm          RRU x 6 → 431 x 500 x 182mm          Meter pillar cabinet → 379 x 171 x 872mm</p>	
Overall Height: approx. 16 metres	
Height of existing building (where applicable):	14 Metres
Equipment Housing:	
Length:	Please see above
Width:	Please see above
Height:	Please see above
Materials (as applicable):	
Tower/mast etc → type of material and external colour:	Steel → grey
Equipment housing → type of material and external colour:	All steel → grey apart from meter pillar cabinet which is steel → green

Reasons for choice of design:
The site was originally erected under emergency powers, and the emergency period expires on 25 <sup>th</sup> May 2018. The site has now been identified as a permanent solution to provide coverage to the local area and therefore a planning application is required to gain permission to permanently retain the equipment.

The equipment has been kept to the minimum amount and height required to allow for adequate transmission without needing an additional site in the area. The equipment has been positioned in as sensitive a position as possible to ensure coverage levels can be met. It is not considered that the permanent retention of the equipment will have a detrimental impact on the area.

Technical Information

<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)</p> <p>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.</p> <p>When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, O2 operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of O2's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>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</p>	<p>Yes</p>	
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<p>investigation and remedy of any reported significant interference.</p> <p>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.</p>		
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4. Technical Justification

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

<p>Please refer to enclosed coverage plots.</p> <p>The existing temporary site has upgraded coverage in the area from in car/indoor suburban (green/blue) to indoor urban and indoor dense pink (orange/pink). Optimum coverage is indoor dense urban (pink) and therefore the existing site is significantly increasing the level of coverage in the area to an optimum level. Making the site permanent will ensure this level of coverage is retained.</p>
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5. Site Selection Process

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
Rooftop	The Piano Works, 28-34 Fortess Road, London, NW5	529004/185390	Rooftop not suitable to host installation
Rooftop	Tally Ho Apartments, London, NW5 1AA	528965/185363	Rooftop not suitable to host installation → not enough space
Greenfield	19-37 Highgate Road, London, N22 6BH	531381/189775	Site provider has planned redevelopment
Rooftop	30-42 Highgate Road, London, NW5 1NS	531374/189834	Discounted by radio planners → will not provide adequate coverage
Rooftop	O2 Forum, 9-17 Highgate Road, London, NW5 1JY	528923/185318	Listed building → less likely to achieve planning than 379 Kentish Town Road
Rooftop	Highgate Bus Centre, 299 Archway Road, London, N6 5AA	528593/188125	Discounted by radio planners → will not provide adequate coverage
Rooftop	Dean House Studios, London, NW5 1LB	528795/185413	Discounted by radio planners → will not provide adequate coverage
Rooftop	Acland Burghley School, 93 Burghley Road, London, NW5 1UJ	529065/185919	Listed building → less likely to achieve planning than 379 Kentish Town Road
Rooftop	Kentish Town Fire Station, 20 Highgate Road, London, NW5 1NT	528899/185441	Only feasible design is considered to have more of a visible impact than the proposal and therefore 379 Kentish Town Road is a favourable option
Rooftop	Linton House, 39-51 Highgate Road, London, NW5 1RT	528821/185461	Discounted by radio planners → will not provide adequate coverage

If no alternative site options have been investigated, please explain why:
Environmental Information: n/a → site is an existing rooftop site
Land use planning designations: None statutory → however site is within the Views from Kenwood to St Paul's protected view area. Site located just outside of the Kentish Town Conservation Area
Additional relevant information (include planning policy and material considerations):

The Camden Council Local Plan was adopted on 3<sup>rd</sup> July 2017. It contains no policies directly relevant to the installation of telecommunications equipment within the borough, although paragraph 5.10 **Digital Infrastructure**, in relation to **Policy E1 – Economic Development**, does state that the Council recognises the importance of digital infrastructure, including telecommunications. **Policy D1 – Design** covers the protection of views between Kenwood to St Paul's.

In relation to **Policy E1 – Economic Development**, the proposal will allow for improved coverage to be continued in the area, as demonstrated on the submitted coverage plots. This can contribute to economic development in the area, and also complies with the spirit of the NPPF. The proposal complies specifically with **Part h** of the policy by allowing for the provision of high speed digital infrastructure.

In relation to **Policy D1 – Design**, the site has been sensitively designed, as the least amount of equipment is proposed to allow for the site to transmit and the height has been kept to a minimum, ensuring that the development respects local context and character. As the equipment is already in situ and has been for some time under emergency planning powers, the site is already an established part of the streetscene and it is not considered that retaining it will have a detrimental impact on the area or the nearby Kentish Town Conservation Area.

The views from Kenwood to St Paul's are not likely to be affected as the site is located approximately 6km from St Paul's Cathedral, which is outside of the distance measurements given in Table 2 of the Viewing Corridor Development Planes section of the St Paul's & Monument Views SPG document from the UDP 2002.

#### **London Plan 2017**

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

Paragraph 1.0.8 states 'Planning for a 'smarter' city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners.' The equipment provides digital connectivity which is of a public benefit to both Londoners and visitors to the area.

Paragraph 1.4.11 states 'The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processed, opening up new markets and allowing more flexible working.' The permanent retention of the site will ensure that the level of connectivity in the area is sufficient to meet the rising demand of reliable data and digital services by the public.

**Policy S16 – Digital connectivity infrastructure** is split into 4 parts. In relation to the proposed retention of the existing temporary equipment:

- 1) The permanent retention of the site will ensure that greater digital connectivity is achieved than set out in Part R1 of the Building Regulations as the site enhances coverage as shown in the coverage plots.
- 3) The permanent retention of the site will ensure that there will be no reduction in mobile connectivity in the surrounding area as the existing level of coverage will be retained.

The site will be an integral element in securing the Mayor's vision for the delivery of modern



communications networks across London.

### **Digital Camden**

The Digital Camden document sets out Camden Council's aims and objectives with regards to the delivery of digital infrastructure in the area. The permanent retention of the site will allow for a sufficient level of coverage to be retained within the area which in turn will allow for better access to mobile technology and will allow the Council to utilise online services.

### **London Infrastructure Plan 2050 – Update**

**Chapter 8 – Digital connectivity** states that digital connectivity is vital and essential for businesses and citizens to take part in modern society. The permanent retention of the site will allow for a sufficient level of connectivity to be continued within the area, thus keeping businesses and citizens at a technological advantage.

### **National Planning Policy Framework**

This legislation was introduced on 27th March 2012 and replaces Planning Policy Guidance Notes and Planning Policy Statements.

The legislation was introduced to help to achieve sustainable development, sustainable means ensuring that 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**

In relation to the above policy, it is considered that the installation has been carefully positioned, is sensitively designed, and will improve connectivity capacity in the area.

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

Of particular relevance to the determination of this application is Paragraphs 42, 43 and 46.

Paragraph 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."

Paragraph 43, "in preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the 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."


Paragraph 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."

In relation to the above, the permanent retention of the site is required to ensure the provision of continued high quality coverage to the area. It has been considered that the proposal has been carefully designed and the least amount of equipment proposed so it does not have an adverse impact on the surrounding area or the host building. It allows for the provision of high quality communications infrastructure, which is essential for sustainable economic growth which benefits the community and local residents.

The site has had a neutral effect in terms of numbers as it replaced the NTQ site at Linton House which was removed. An existing building is being utilised as opposed to introducing a new ground based structure, which is in spirit with the Paragraph 43 of the NPPF, and an ICNIRP certificate is included with the application in line with the guidance in Paragraph 46 of the NPPF. The equipment has been sensitively designed in that the least amount of equipment is proposed to allow for the site to transmit and the height has been kept to a minimum. The coverage provided by the site boosts connectivity in the area, which benefits the public.

It is therefore considered taking all these factors into consideration that the proposal is the best available option and therefore complies with the aims and objectives of the NPPF.

**We confirm that the submitted drawings have been checked for accuracy.**

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		(on behalf of CTIL and above operator)	