

Harlequin Group

Innovation Centre

Maidstone Road

Chatham

Kent

ME5 9FD

t: 01634 790822

e: n.kelleher@harlequin-group.com

w: www.harlequin-group.com

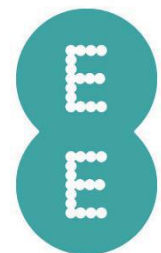


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Rev	Originator	Approved	Date
0	Name	Name	Day/Month/Year
1	Niall Kelleher	Dominic O'Connell	20 th February 2019
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Introduction

This Planning Supporting Statement has been prepared by the Harlequin Group on behalf of EE Limited. The statement is provided in conjunction with the Supplementary Information, drawings and supporting material that was submitted with this planning application in support of the application to install a 10-metre-high 'Alpha 8' Street Pole installation and associated equipment to be located on a private grass verge on Dresden Close, West Hampstead, London, NW6 1XH

In accordance with the Code of Best Practice on Mobile Network Development and published Government guidance, this proposal was drawn up having regard to the need for good design. This statement sets out the most relevant considerations in respect of the proposed development. This provides context for the proposal, reasoning, technical justification and planning constraints, policy guidance and alternatives.

In particular:

- Considerations of design and layout are informed by the context, having regard not just to any immediate neighbouring buildings but the townscape and landscape of the wider locality. The local pattern of streets and spaces, building traditions, materials and ecology all help to determine the character and identity of the development.
- The scale, massing and height of proposed development have been considered in relation to that of adjoining buildings; the topography, the general pattern of heights in the area; and views, vistas and landmarks.

The following general design principles have been taken into account in respect of this proposed telecommunications development:

- A proper assessment of the character of the area concerned.
- That the design shows an appreciation of context;

1.0 Proposed Development

1.1 The Site

The proposed 10m 'Alpha 8' street-pole with associated cabinets will be located on a private grass verge on Dresden Close, West Hampstead, London, NW6 1XH. This location is owned by Camden Council Estates, and we have been given permission for the proposal to progress at this location by a representative of LB of Camden Council. Dresden Close is situated on the north side of the railway line, in this instance the equipment is situated on the southern portion of land directly adjacent to the railway. The installation has been proposed in close proximity to the Network Rail equipment in which it shares its height, materials, and colour with the equipment thereby reducing any perceived visual impact which may be caused if the site was placed elsewhere in the vicinity.

The proposal has been specifically designed and located to minimise the visual impact on the area, in which it is noted as a residential area. In this instance, the proposed slimline pole will be located at the rear of a wide privately-maintained grass verge on this road. Sited directly behind the site to the south is the boundary fence and the aforementioned Network Rail equipment in which provide a direct utilitarian context to the proposal. By positioning the proposed ground level apparatus at this location, it is envisaged that the visual impact will be substantially reduced. It should be noted that after a successful planning decision was reached previously, Network Rail stated that the cabinets would have to move due to health and safety concerns, therefore the cabinets have been relocated to directly adjacent the pole on a grass verge.

To the east is the continuation of Dresden Close there are residential properties throughout Dresden Close and indeed the estate, and as such it is acknowledged that the proposal will be in view of some residential properties and this cannot be avoided. However, as mentioned the proposal will be seen to blend with the existing views associated in close proximity to the residential housing and therefore is not out of keeping with the area.

Due to the requirement of providing coverage for this stretch of railway, this location is ideal to provide an excellent improvement in 4G coverage as well as minimising the impact of the development. There is no alternative location for the proposed apparatus.

There are also other items of street furniture within the surrounding area including street names, traffic signs, and lamp posts; as such this is not an unspoilt landscape which is without existing street furniture and a precedence set.

The proposed installation height of 10m is necessary due to the height of the surrounding clutter and is acknowledged that it will be slightly taller than other existing street furniture, but this is purely due to technical constraints associated with telecommunications apparatus. It should be noted that 10m is also the height of the gantry poles of the Network Rail equipment and therefore is not taller than existing steelwork in the immediate vicinity.

Aerial photograph of the proposed location



1.2 Application History

The requirement for a new mobile phone base station in this area is to provide improved mobile phone coverage for individuals utilising the rail at this location, local residents, visitors, and businesses. This site will also form part of the new Emergency Services Network that will replace the existing radio service used by the emergency services. EE's radio planners have confirmed that there are no similar structures to locate to or optimise in order to provide the required coverage, therefore a new cell is required to fill the coverage gap.

If the coverage gap is not filled, then existing users of the network's voice and data services will continue to experience little to no coverage in this area. These users will include the Emergency Services, as EE have been awarded the contract to provide network coverage for all the blue light services.

There have been no applications within Dresden Close or the estate relating to the proposal. It is noted that EE Ltd. have acquired and recently built a 20m 'Phase 5' Pole on Blackburn Road outside of Nido House (2018/0774/P) after being previously rejected (2016/7123/P). It should be

noted that this mast has been verified by an EE Ltd. Radio Engineer to not be viable to cover the area requiring 4G coverage as to which this proposal relates.

1.3 The Proposal

The proposal consists of the installation of a 1No. 10m high telecommunications 'Alpha 8' street pole with GRP shroud, 3No. multi-band antennas, 2No. 0.3m DIA dishes, 3No. equipment cabinets and ancillary development thereto. EE Ltd are aware of the potential perceived negative views on telecommunications development, and has accordingly adjusted the design of this mast, utilising the slimmest street-pole style capable of housing the 4G equipment, this was chosen to further mitigate any perceived visual impact given the residential nature of the area but also represents similarities between the proposal and the Network Rail equipment more so than alternative designs. The proposal also benefits from being painted Grey (RAL7035) to blend with the aforementioned equipment.

The height of the proposal has been kept to an absolute minimum required at 10m. At 10m, this is a considerably lower height than the discounted options or indeed the telecommunications mast approved on Blackburn Road (2018/0774/P), and whilst ground-based telecommunications masts are typically taller than the surrounding buildings or miscellaneous equipment, however, in this instance, as demonstrated in the enclosed proposed plans, the proposal is in line with equipment and buildings around the area. We believe that given this it greatly mitigates any perceived negative siting and appearance issues relatable to the proposal especially given the nature of its immediate area.

It should be noted that all utility providers, which includes EE Ltd, adhere to the National Joint Utilities Group (NJUG) guidelines for installation equipment near to trees. In this instance, we have designed the site so that it does not have an impact on any tree root systems and can therefore give an assurance that no damage will occur to these during the construction phase of the proposal.

The principal components of the proposed development are outlined in the Supplementary Information Template, and the general layout illustrated on the attached drawings titled: Proposed Site Plan and Proposed Elevation.

1.4 Alternative Site Assessment

The table below details of the alternative sites to the chosen option that were investigated when searching for a replacement location. Many of the options considered were discounted due to the technical/operational requirements or planning concerns. It should be noted that the search area is split into two locations to cover the tunnel, one at Hampstead Heath station and Finchley Road & Frognal Station.

Discounted Options & Reasons (Note: mention ALL possible whatever the reason for discounting)	
A – The Magdala Tavern – Approx. NGRs: 527274, 185674	There does not appear to be a viable access to the roof, furthermore the vegetation in the immediate locale is very heavy which inhibit any signal from providing to the intended area.
B – Parliament Court – Approx. NGRs: 527320, 185676	There is no viable access to the rooftop to install or maintain equipment at this location. Furthermore, the vegetation in the immediate locale is very heavy which inhibit any signal from providing to the intended area
C – S Hill Park SW – Approx. NGRs: 527235, 185644	This location does not have enough viable space to safely locate all required equipment. The vegetation is also particularly heavy at this location which will limit the location and height of the Phase 5 pole. Additionally, this is situated within a Conservation Area and would not be in keeping with the area.
D – Flats off Maryon Mews – Approx. NGRs: 527174, 185547	

This location has been confirmed by an EE Ltd Radio engineer to provide the intended area with coverage.

E – Rooftop of 37-39 S End Road – Approx. NGRs: 527226, 185608

No viable rooftop access to sufficiently gain access to install or maintain equipment. Furthermore, this location is situated within a Conservation Area and would not be in keeping with the area.

F – S End Road – Approx. NGRs: 527253, 185605

This site would be highly imposing on the area and planning designations, therefore has to be discounted from a planning perspective.

G – S End Green – Approx. NGRs: 527306, 185536

Wide enough footpaths but situated in extremely close proximity to several Listed Buildings and is within Conservation Area. This location does not benefit from any screening and would be very imposing on the area. Discounted from a planning perspective.

H – Pond Street – Approx. NGRs: 527169, 185476 (Various)

There is not enough available space on footpath to legally or safely install telecommunications equipment.

I – S End Road (2) – Approx. NGRs: 527261, 185584

There is not enough available space on footpath to legally or safely install telecommunications equipment. Furthermore, this location is situated within the Conservation Area and would be very imposing on the area with no screening to benefit the location.

J – St Crispins Close – Approx. NGRs: 527309, 185611 (Various NGRs)

Entirely residential street with no available space to locate equipment therefore has to be discounted.

K – S End Close & Surrounding residential flats – Approx. NGRs: 527343, 185561 (Various NGRs)

No viable space to locate equipment with suitable access, rooftops are not suitable for hosting of equipment and any installation to the south of S End Close would be limited in providing coverage due to the tall residential flats in this area.

L – 3-5 Cressy Road – Approx. NGRs: 527560, 185515

There is not sufficient height at this location to install equipment on the rooftop which is capable of providing the required coverage.

M – 75 Fleet Road – Approx. NGRs: 527468, 185390

This location is in close proximity to the current EE installation at Royal Free Hospital, the hospital itself may block much of the signal to the required area.

N – Hill Court – Approx. NGRs: 527426, 185738

There is considerable vegetation at this location which would block signal from providing service to much of the intended section. Would require a larger height to compensate as such this has therefore discounted.

O – Royal Free Hospital – Approx. NGRs: 527290, 185447

Initially put as a valid option on the original SSR due to lack of available options in the area and the restrictive nature of the search area. Royal Free Hospital is considerably tall and feature multiple network operators on their structure, including EE. However, I was advised by a radio engineer at EE Ltd that this location is not capable in providing the required coverage to the area. Therefore, this has to be discounted.

Below discounts are now situated within the area around Finchley Road & Frognal Station.
Please refer to discount map below.

P – Hampstead Cricket Club – Approx. NGRs: 525727, 184939

During a site visit it was decided that to cover the intended location the mast would have to be at the realms of 20m+. This location is surrounded heavily by residential properties and land designations, it was deemed that planning consent would not be forthcoming at the required height and therefore has to be discounted.

Q – Billy Fury Way – Approx. NGRs: 526055, 185028

Ideal location to provide the required coverage, however there are several constraints which limit this site to a discount only. There is very tight space available on the carriageway for attending vehicles, build would be difficult in this location also. This location is also in very close proximity to a large tree which would likely block the signal to the tunnel thus making the site redundant. Furthermore, there are multiple residential flats which would likely fall within the ICNIRP exclusion zone. Considering the above factors this site has to be discounted.

R – Cumberland Lawn Tennis Club – Approx. NGRs: 525767, 185148

Directly north of Hampstead Cricket Club. However, this location has been confirmed as not viable to provide the coverage to the intended area.

S – Playpark south of Billy Fury Way – Approx. NGRs: 525809, 184864

This location is situated directly within a children's play area, locations of this type are highly unfavourable from a planning perspective and often will face considerable objection due to its location. Furthermore, this location despite being in close proximity to the rail would need to be 17.5m-20m to compensate for the building clutter, which is unlikely to gain planning.

T – Roof of Mahogany House – Approx. NGRs: 525897, 184899

The rooftop of the majority of these flats is not suitable to withstand the load bearing for telecommunications apparatus. There is a small section of rooftop which is suitable from a build perspective situated on the block of stairs. However, this location has no viable access and may not have the sufficient height to clear the clutter of the buildings to provide the coverage. Therefore, this location has been discounted.

U – Playpark adjacent to Crown Close – Approx. NGRs: 525731, 184858

Location is owned by Camden Council who have stated verbally that they would not want a site in that closer proximity to the play area. This location is likely to face objection from local residents. Preferred option has been confirmed by a representative of Camden Council as a more ideal location.

V – Land above Potteries Path – Approx. NGRs: 525664, 184851

Land leased by Travis Perkins Trading Co. To compensate for the topography and the clutter between this location and the target area a mast upwards of 20-25m in height may be required. Given the above constraints this site has been discounted from a planning, & siting and appearance perspective.

W – Land to the east of Billy Fury Way – Approx. NGRs: 525697, 184785

This land is owned by Network Rail with a Network Rail mast in proximity. Due to the existing Network Rail mast any mast would need to be some considerable distance away to mitigate any potential interference issues. Moving away would not allow the proposed mast to provide to the required area.

X – Nido West Hampstead Student Accommodation – Approx. NGRs: 525670, 184772

This location is in close proximity to an existing EE Ltd telecommunications site and therefore has been confirmed by a Radio Engineer at EE Ltd as to not be viable to have two masts in close proximity

Y - Commercial Park off Finchley Road – Approx. NGRs: 525763, 184775 (Various)

There is a limited amount of available space to locate appropriate equipment. Furthermore, it is believed that a mast at this location would not have the capability to provide coverage to the intended area.

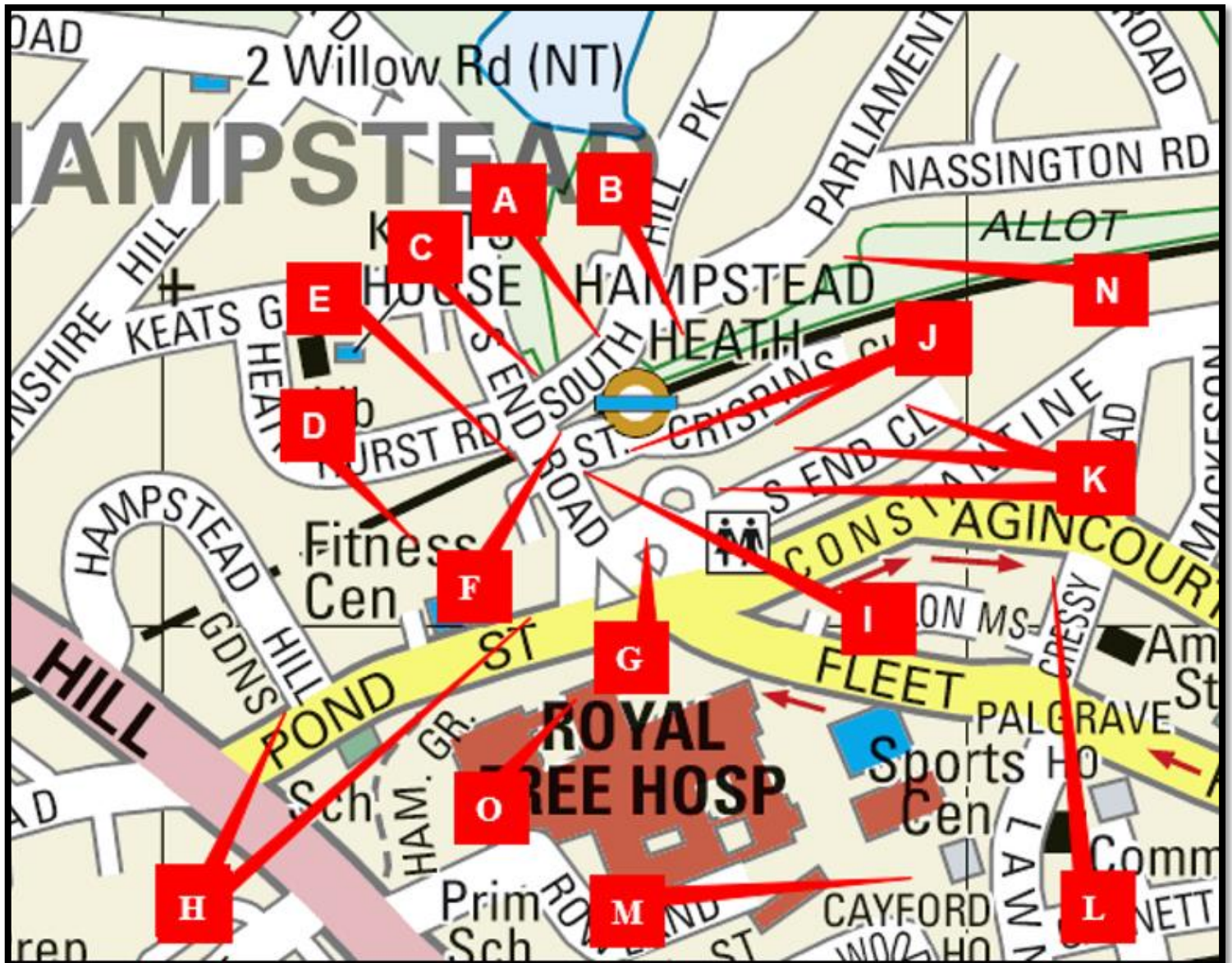
Z – Land north Billy Fury Way – Approx. NGRs: 525647, 184799

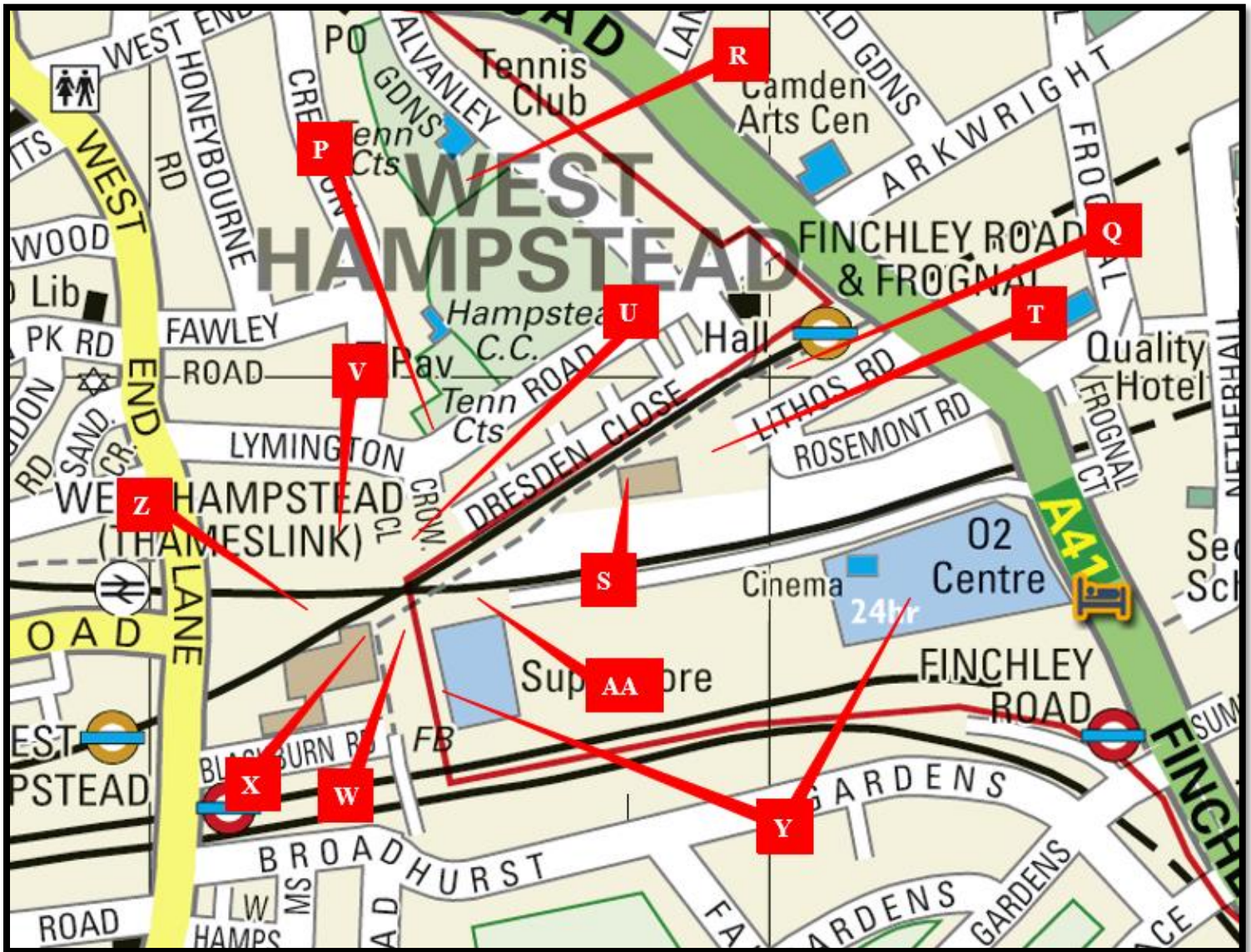
This location is outside the search area, but this location is in close proximity to an existing EE Ltd telecommunications site and therefore has been confirmed by a Radio Engineer at EE Ltd as to not be viable to have two masts in close proximity

AA – Existing Network Rail mast – Approx. NGRs: 525731, 184791

We have been advised that this mast is not capable of sharing the required equipment. Furthermore, at its current height would not be capable of providing the coverage to the intended area.

Please note there are multiple residential roads within the search area which do not have the required space to install telecommunications equipment and/or situated in extremely close proximity to residential properties. Various NGRs





Map of discounted options

1.5 Local Engagement

The site has been rated as Red on the mobile operators' consultation traffic light rating system and consultation was carried out with the Local Planning Authority, Ward Councillors, and Network Rail. The representative of Camden Council, of whom gave permission to locate at the proposed location will be undertaking additional consultation to residents and stakeholders. Our services have been offered to assist with this and any comments that they receive.

2.0 Planning Policy

This section sets out the most relevant national and local planning policy concerning the proposed development.

2.1. General Policies

National planning guidance on electronic communications in England is contained in Section 10 of the National Planning Policy Framework (NPPF July 2018), entitled 'Supporting high quality communications'. The framework states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile telephony (such as 5G) and full fibre connections.

The NPPF confirms that the number of radio and electronic communications masts, and the sites for such installations should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network, and providing reasonable capacity for future expansion. The use of existing masts, buildings and other structures for new electronic communications capability should be encouraged, where new sites are required these should be sympathetically designed and camouflaged where appropriate.

Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose Article 4 Directions, or insist on a minimum distance between new electronic communications development and existing development.

Applications for new electronic communications development should be supported by information on alternative siting and design options considered, consultation undertaken, design and siting rationale and an ICNIRP declaration. In determining applications local planning authorities must base their determination on planning grounds only, and should not prevent competition between different operators, question the need for the development, nor set different health standards to the ICNIRP guidelines.

The NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Whilst this site is required to address a specific coverage issue, the site has been designed with a 3-sector antenna system. This provides the required coverage along the railway line and optimises the local benefit and access to a high-quality modern communication network. Local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the associated special problems and technical needs of developing communications networks.

It must also be stressed that alternative locations have been considered and for a variety of reasons discounted as can be found under the Supplemental Info with the application. Moreover, the continued public benefits, including provision uninterrupted emergency services coverage, that the proposal will bring to commuters, residents and businesses in the area through 2G/3G/4G coverage is unquestionable from an economic, social and environmental perspective. This will not be achieved if this application is not approved by the Local Planning Authority.

2.2. Local Planning Policies

London Borough of Camden does not have a specific telecommunications policy. Therefore, the NPPF is of relevance. The above National Planning Policy section of this statement goes into detailed analysis of the sites compliance with the NPPF. The sharing of base stations between multiple operators is one of the key strategic policy principals within the NPPF. H3G (Three) and EE (EE) have a network sharing agreement and thus these installations are compliant with the sharing policy principles within the NPPF.

The proposal also is in accordance with the objectives highlighted in the London Plan (Policy 4.11: Encouraging a Connected Economy (March 2015)). This proposal is also in accordance with the objectives highlighted in the National Infrastructure Commission: Connected Future (December 2016) – Policy points 2.22 to 2.38 are related to Connectivity on main line train routes; culminating in a programme to 'roll-out' coverage across train lines. This programme has been further substantiated in

the National Infrastructure Commission (July 2018) where it compounds the need for additional mobile coverage on main train routes.

As previously mentioned, EE Ltd requires a site for a new installation in this location to provide coverage to the section of Railway at this location as well as the immediate locale.

Without this installation, there would be an adverse impact on those that rely on this vital service and coverage from an economic, social and environmental perspective. Not least the Emergency Services who will also be reliant on the coverage the proposed installation will provide.

An alternative site assessment has been submitted within this planning statement that clearly outlines that other sites have been identified, researched and considered not to be appropriate. Ultimately, this is the only location where the installation can be located.

We would again reiterate that we believe that we have demonstrated that the telecommunications development, having regards to the technical and operational constraints, has been designed to minimise environmental and visual impacts through careful siting and design choices. The proposal complies with national planning guidance and local level policies and as such it is considered to provide the best location from both a technical and town planning view.

Any information required regarding location, height of antennas, frequency etc. can be found in the supporting documents, which are submitted as part of this prior approval application. As noted below, an ICNIRP certificate has also been enclosed. We are of the opinion that this proposal is compliant with all relevant planning policy, as noted above, and could therefore be supported by your department.

3.0 Access

Under section 42 of the 2004 Act, access requirements both to and around the site should be considered. It must be considered that this site is for telecommunications purposes only.

3.1 Construction and Maintenance

Access to the site is to be taken from Crofton Lane. Maintenance visits are required approximately every 6 months by an operative with a light vehicle. During the construction process all build and maintenance regulations will be complied with. Proof of compliance can be confirmed closer to the time of construction if necessary.

3.2 Public Access

Radio base stations are not designed to be accessible by the public. The equipment cabinets would be locked at all times and only accessible by authorised persons. Therefore, no specific public access provisions are required to be incorporated into the design of the proposal.

4.0 Regulatory Statement

EE is authorised to operate a public electronic communications network and supply public electronic communications services under the provisions of the Telecommunications Act 1984, the Communications Act 2003 and the Electronic Communications Code (Conditions and Restrictions) Regulations 2003 and aims to meet all reasonable customer demand for that service.

OFCOM statistics show that in 2013 mobile phones are owned / used by 92% of UK adults. This demonstrates the vital role mobile communications play in the social and economic wealth of the country. Whilst the vast majority of the UK now benefits from mobile coverage there are still spots without coverage. EE under their communications code licence to run a public communications network are duty bound to provide equal coverage to all areas of the UK. This is why the need for communications systems should not be tested by Local Planning Authorities, as it is for the communications code operators to determine locations where coverage is required and demonstrate in evidence.

The development proposed is to provide improved mobile phone coverage to the users of this section of Railway; the installation will also provide greater mobile phone coverage to local residents and

businesses in the immediate locale. Emergency services will also utilise this particular mast at a later date.

5.0 Health and Safety

Telecommunications planning guidance states that it is not for the local planning authority to seek to replicate through the planning system controls under the health and safety regime as it is a matter for the Health and Safety Executive. The Government guidelines state that provided a proposed base station meets the ICNIRP guidelines for public exposure, then it should not be necessary for the local planning authority to consider the impacts of health concerns.

It is confirmed that the proposed equipment and installation complies with ICNIRP guidelines and a Certificate of Compliance has been submitted in support of the application.

6.0 Conclusions

The telecommunications installation proposed as set out in this application has been designed and sited having regard to technical, engineering and land use planning considerations in order to minimise its impact on the local environment. The mast height has been kept to the minimum required to ensure operational efficiency - a structure with an overall height of 10m is needed in this locality because of the railway curvature and surrounding clutter. Consideration has been given to the design of the mast given the nature of the area and this is reflected in the 'Alpha 8' street pole structure which is provided a utilitarian context with the existing Network Rail structures in the immediate locale; where it can be deemed that a precedence has been set for steelwork; indeed it should be noted that the proposal is of a similar size and height to multiple support poles in the aforementioned Network Rail apparatus, thus the proposal will blend with its backdrop.

In relation to planning policy, in accordance with the guidance set out in the NPPF and local policies, a thorough search of the area has been undertaken and revealed that there are no existing masts or other structures suitable, or less viable locations. Therefore, the development of a new mast site is justified. In addition, national policy clearly states that any development which seeks to improve telecommunications infrastructure should be supported in principle.

Our previous application at this location was successful but upon granted permission, Network Rail stated that due to health and safety concerns that the cabinets (only) require movement. Therefore, in line with this the cabinets have been relocated to the grass verge directly adjacent.