

LPA ref 2019/0190/P

30 May 2019

Chief Planning Officer
Camden Council
Camden Town Hall
Argyle Street
Euston Road
London
WC1H 8EQ

FAO: David Peres Da Costa

Dear Mr Da Costa

Town Planning Solutions Ltd



Email:



OBJECTION TO PLANNING APPLICATION, LPA REF: 2019/0910/P

Further to my email of 15 May 2019 and your reply of 16 May 2019, please find below my clients' formal objection to planning application LPA ref 2019/0910/P for the redevelopment of 369-377 Kentish Town Road for a part 6-storey, part 7-storey mixed-use residential and commercial development.

CTIL (now rebranded as Cornerstone), Telefónica UK Ltd (trading as O2) and Vodafone Ltd manage and operate a shared electronic communications radio base station on the rooftop of 379 Kentish Town Road, the building that lies immediately to the northwest of the planning application site at 369-377 Kentish Town Road.

The proposed development at 369-377 will materially affect the continued operation of the rooftop radio base station at 379 Kentish Town Road. Among other interference, it will completely block the transmission and reception of 2G, 3G, 4G and planned 5G RF signals from the two antennas that are presently sited on the rooftop of 379 Kentish Town Road directly above the building's southeast elevation. These two 120 degree multiband antennas currently provide radio-frequency coverage to Kentish Town town centre for O2 and Vodafone in an arc running from approximately 90 degrees (east) to 210 degrees (southwest).

CTIL, Telefónica UK Ltd and Vodafone Ltd object to the redevelopment proposal because of its seriously detrimental impact on the satisfactory continued operation of their existing shared rooftop installation at 379 Kentish Town Road.

I have now examined the many documents included with the planning application and included on the LPA's planning website, and it appears clear the applicant's agents have been completely remiss in not considering the impact of their proposed development on the existing shared rooftop radio base station at 379 Kentish Town Road.

It is as though the applicant's agents have deliberately ignored the evidence of their own eyes. Despite the shared rooftop radio base station being clearly seen on-site (see figures 1 and 2, below), and indeed is also clearly seen in the images included

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at pages 7, 9, 17, 19 and 21 of the architect's submitted Design and Access Statement, there is not a single word in that statement about any impact of constructing a part-6, part 7-storey development against the southeast elevation of 379; a rooftop on which there are 6 multi-band antennas including two antennas that will directly face onto the 6-storey flank wall of that proposed development, as can be clearly seen from figure 1. Indeed, the architect's 'Existing East Elevation' drawing submitted with the planning application, which is dated August 2018, fails to show the shared rooftop base station at 379 even though it was in place long before that date.



Figure 1: Southeast elevation of 379 Kentish Town Road, view north up Kentish Town Road.

It is also noted a Health Impact Assessment, dated February 2019, has been included with the planning application. Remarkably, in the wide range of health related issues considered in the report there is not a single word about the possible impact on the proposed development of there being an existing shared rooftop radio base station on the rooftop of 379, the property directly adjoining the proposed development site. Among other matters, there is no assessment of any health and safety implications of having 6 RF multi-band antennas operating on the adjoining rooftop, or any implications of the ICNIRP safety exclusion zones that spread out directly in front of the 6 antennas.

In respect of Camden planning policy it is noted that in accordance with paragraph 20 of the NPPF, which requires that development plans should contain strategic policies that make sufficient provision for telecommunications among other infrastructure, the 2017 adopted, Camden Local Plan policy E1 states:

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'Policy E1 Economic development

The Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses'.

We will:

h. expect the provision of high speed digital infrastructure in all employment developments'



Figure 2 Northeast elevation of 379 Kentish Town Road, view south down Fortress Road

Policy E1(h) is amplified at paragraph 5.10 of the local plan written statement where it is stated:

'Digital infrastructure

5.10 The Council recognises the importance of digital infrastructure in enterprise development and expects electronic communication networks, including telecommunications and high speed broadband, to be provided in business premises'.

379 Kentish Town Road is a property in business and residential use, as is the redevelopment proposal at the car-wash site. The shared electronic communications

radio base station on the rooftop of 379 is clearly fully in accordance with up-to-date local plan policy.

Lastly and most importantly there is a current NPPF requirement, at paragraph 114, for LPA's to ensure, *'they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services'*.

To date neither CTIL, nor Telefónica UK Ltd, nor Vodafone Ltd for that matter, have been notified or consulted by the either the developer or the LPA in respect of the major redevelopment scheme at 369-377 Kentish Town Road. As is demonstrated in this objection, the redevelopment scheme as currently proposed will seriously interfere with the continued operation of the existing shared rooftop electronic communications radio base station at 379 Kentish Town Road and therefore CTIL, Telefónica UK Ltd and Vodafone Ltd request the LPA refuse the planning application for this reason, among any other reasons for refusal.

Yours sincerely

[Redacted signature]

[Redacted name]

Town Planning Solutions Ltd
For CTIL, Telefónica UK Ltd and Vodafone Ltd