

## SUPPLEMENTARY INFORMATION

### 1. Site Details

Site Name:	Academic House	Site Address:	Academic House, 24-28 Oval Road, London, NW1 7DT
National Grid Reference:	E528550 N183981		
Site Ref Number:	148390 TEF 41812 VF 36725	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?	Yes	<b>No</b>
If no explain why:  Previous applications for full planning permission (Ref: 2016/3257/L) and Listed Building Consent (Ref: 2016/2814/P) were approved by the Council on 14/9/16. However, this planning permission was never utilised. As the equipment and design is not dissimilar to what is now being proposed, it was considered that this location offered the best environmental and planning solution.		
Were industry site databases checked for suitable sites by the operator:	<b>Yes</b>	No
If no explain why:  As detailed above, this application relates to a site which received a previous planning approval by the Council.		

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

Was there pre-application contact:	Yes
Date of pre-application contact:	24/6/19
Name of contact:	N/A

<sup>1</sup> Macro or Micro

Summary of outcome/Main issues raised:

A pre-application consultation letter was issued to the The London Borough of Camden Council on 24/6/19. This letter outlined the proposed development and detailed design drawings were provided, with feedback from the LPA requested. Since the original pre-application consultation letter was issued, the proposed rooftop design has been altered to allow a repositioning of some proposed apparatus to better utilise the proposed GRP shrouding.

Given that a similar development was previously approved by the Council, it was considered appropriate to move directly to planning submission.

### Community Consultation

Rating of Site under Traffic Light Model:	<b>Red</b>	Amber	Green
Outline of consultation carried out:	A pre-application consultation letter was issued to the Councillors of the Camden Town with Primrose Hill Ward, and MP Mr Kier Starmer. Detailed design drawings were issued and feedback was invited. However, as of the date of this planning submission, no formal response has been received.		
Summary of outcome/main issues raised (include copies of relevant correspondence):	Whilst it is acknowledged that small changes have been made to the proposed design since the original pre-application consultation letters were issued, given these small changes, the decision was made that this exercise should not be refreshed and we should proceed directly to planning submission.		

### School/College

Location of site in relation to school/college (include name of school/college):	The nearest schools (Primrose Hill School and The Cavendish School) are approximately 200m away from the application site and will not have a view of the proposed development. Therefore, no pre-application consultation was undertaken with these schools.		
Outline of consultation carried out with school/college (include evidence of consultation):	Consultation with schools was not undertaken		
Summary of outcome/main issues raised (include copies of main correspondence):	N/A		

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**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	<b>No</b>
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	<b>No</b>
Details of response:  The requirement to notify nearby airfields or the CAA does not apply in this case.		

**Developer's Notice**

Copy of Developer's Notice enclosed?	Yes	<b>No</b>
Date served:	N/A	

### 3. Proposed Development

#### The proposed site:

The application relates to the rooftop of Academic House, 22-24 Oval Road, London, NW1 7DT. Although this site does not currently accommodate telecommunications apparatus, previous applications for full planning permission (Ref: 2016/3257/L) and Listed Building Consent (Ref: 2016/2814/P) were approved by the Council on 14/9/16. This planning consent was not utilised and the proposal in front of the Council is not wholly dissimilar to the one which the Council considered acceptable in 2016.

Equipment for both Telefónica (O2) and Vodafone is proposed and will provide and improve 2G, 3G, 4G and new 5G coverage to the local and surrounding community. The existing roof level is measured at 25.3m, with an existing flute exceeding this height and measuring 26.3m. The proposal in front of the Council will lead to a small increase in height, with the proposed high-point being measured at 27.5m, which is the top of the proposed antennas. Given this small increase in height, which is isolated to one specific area of the rooftop, will result in undeniable improvements in mobile connectivity for the local area, on two major mobile networks, it is considered that the public benefits of the this proposal greatly outweigh any perceived visual impact that this 1.2m height increase may cause.

Academic House is a Grade II Listed Building (Listing Entry 1113236). The site falls within the Regents Canal Conservation Area. The level and scale of development in this area of London, combined with the road layouts, means that views of the building are not available over long distances, and it is therefore considered that there will be little in the way of significant visual impact caused by this proposal.

#### Enclose map showing the cell centre and adjoining cells if appropriate:

Network information can be provided on request.

#### Type of Structure (e.g. tower, mast, etc):

##### Description:

- Installation of 4no antennas to be mounted on new steel support poles;
- Installation of 1no transmission dish to be mounted on a new steel support pole;
- Installation of 2no GPS modules to be mounted to antenna pole;
- Installation of 6no equipment cabinets behind a GRP screen to be fixed around steel grillage.
- Installation of 7no ERS's (Erikson Radio System) to be mounted to wall;
- Installation of 5no RRU's (remote radio units) on freestanding frame.

For the avoidance of doubt, due to their size and scale, the 7no ERS's and 5no RRUs are considered to be ancillary development.

Overall Height:	
Height of existing building ( <i>where applicable</i> ):	26.3 Metres
Equipment Housing:	
Length:	660mm
Width:	800mm
Height:	1770mm
Materials ( <i>as applicable</i> ):	
Tower/mast etc – type of material and external colour:	New support poles – steel
Equipment housing – type of material and external colour:	Steel – Grey (unless otherwise requested by the Local Authority)

Reasons for choice of design, making reference to pre-application responses:
<p>Base stations are primarily comprised of radio equipment that generates signals, housed within cabinets or larger cabins, antennas that emit those signals and the supports that allow the antennas to achieve the necessary heights for optimum operational efficiency and ICNIRP compliance. Other elements such as Dishes, GPS modules, RRUS and cabling etc allow sites to link into the network, enhance the reach and operational efficiency of sites and provide power to the apparatus, provide either by a link to the REC supply or external general source. The elements are generally collectively referred to as "ancillary apparatus".</p> <p>The purpose of the proposed works is to enable the provision of 2G, 3G, 4G and new 5G services on the Telefonica (O2) and Vodafone networks. In order to achieve this, the installation of a new base station is required at the application site. The proposed design is very similar to a proposal which was previously approved by the Council (Ref: 2016/3257/L; Ref: 2016/2814/P). The proposed design will install the necessary equipment to provide network coverage for two major mobile operators. As previously highlighted within this application, there will be one isolated height increase on the rooftop, associated with the installation of 2no pole mounted antennas. This will increase the height of the roof in this one area from 26.3m to 27.5m. This is considered a marginal increase in height and it is unlikely that this apparatus will be visible from the wider streetscene, especially given the height of the surrounding buildings in this area and the limited opportunities for public viewing from ground-level.</p> <p>Additionally, a GRP screen will be installed on the rooftop which will provide excellent screening to the required equipment cabinets, which will be tactically positioned to its rear. This screen is not dissimilar to the 2-metre-high screen which was proposed within the the previous application (Ref: 2016/2814/P) which the Council considered acceptable and duly approved.</p> <p>The necessary RRU's will be sited as close to the antennas as possible for operational efficiency. The installation of 6no cabinets are required on the rooftop and these will be sympathetically positioned to the rear of the GRP screen to reduce any visual intrusion as far as practicable.</p>

As detailed, all apparatus required will play a vital role in the provision of 2G, 3G, 4G and new 5G services for two major mobile networks. The scale and amount of apparatus has been limited to the minimum with which this can be achieved, with the result that the level of visual change at the site would be negligible and any harm to the host building, its setting or the wider area, is avoided. Where possible, and practicable, the proposal in front of the Council has tried to mirror the previously approved (but never built) design at Academic House. It is considered that this proposal offers the optimum solution in terms of environmental impact. It is also considered that the public benefit of this proposal greatly outweighs any impact on the building, or the wider setting, and the development has been designed to ensure that this is the case.

Technical Information

	<b>Yes</b>	No
<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, Vodafone and Telefonica, 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 Vodafone and Telefonica'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</p>		

<p>includes 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

**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

As stated, the proposed development will enable the provision of 2G, 3G, 4G and the provision of new 5G services for two major mobile networks (Telefonica (O2) and Vodafone) in this part of the City. 4G (LTE, the acronym used for 'Long Term Evolution') supports mixed data, voice, video and messaging traffic and offers speeds of up to five times faster than 3G, enabling network users with 4G devices to benefit from ultra-fast internet browsing, video streaming, gaming, e-mail and downloads. 5G is the next generation of mobile internet connectivity, offering faster speeds and more reliable connections on smartphones and other devices than ever before. Compared to even the most recent and efficient generation of mobile network, 4G, 5G is set to be far faster and more reliable, with greater capacity and lower response times.

High-quality communications infrastructure is essential for sustainable economic growth and that high speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.

The UK Government, recognising the benefits to commerce, industry and the public in general, places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. Paragraph 122 of the NPPF (2018) 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 technology (such as 5G) ...*" The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal, to enable Telefónica and Vodafone to provide improved network services to the surrounding area, will assist in achieving these objectives within the City of London.



The Planning Inspectorate too has in recent years continually recognised the importance of this issue and cited it in appeal decisions that have overturned the decisions of local authorities across the UK where there has been a failure to apply due weight to the value of connectivity to social and economic prosperity in the assessment of applications made for telecommunications development, even in protected or sensitive areas. As an example, in October 2018 the decision of Winchester City Council to refuse Prior Approval for the installation of a 17.5m high monopole and associated equipment housing, required to replace an established site being lost from Vodafone's network, was overturned by the Planning Inspectorate (CTIL and Vodafone Vs Winchester City Council, appeal reference APP/L1765/W/18/31975). Within the decision notice, the Inspector stated that:

*"I attach significant weight to the public benefit arising from the continuation of local service provision.....Having regard to all relevant considerations.. my findings are that the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area".*

In this instance, the benefits of enhanced connectivity services can be achieved at this location through the very small design alteration of a previously approved telecommunications site, and is therefore considered to be a wholly appropriate solution.

## 5. 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 Type	Site name and address	National Grid Reference	Reason for not choosing site
Rooftop	12 Oval Road, London, NW1 7DH	E528587, N183928	This option was discounted due to the lack of access route and the taller surrounding buildings, which would distort and restrict mobile coverage from this location.
Rooftop	32 Jamestown Road, Camden Town, London, NW1 7BY	E528644, N184013	This option was discounted in favour of the proposed development at Academic House, due to the Council's previous planning approval (which was not utilised). It is considered that Academic House offers the best solution in terms of positive town planning criteria.
Rooftop	Lock House, 35 Oval Road, London, NW1 7BF	E528518, N183953	This option was discounted due to the lower height of the building compared with the chosen option, and the restricted rooftop space would be unlikely to accommodate the necessary telecoms apparatus.
Rooftop	38 Jamestown Road, London, Nw1 7BY	E528557, N183994	This option was discounted due to the rooftop consisting of balconies for residential properties. It was therefore considered that this option did not provide the same level of positive environmental and town planning criteria as the proposal site.
Rooftop	One Housing Group, 220 Arlington Road, Camden, London, NW1 7HE	E528742, N183957	This option was discounted as it is situated too far away from the desired target area. It would, therefore, not provide the required level of mobile coverage. Additionally, this location is considered too close to existing network cell sites and any solution at this location would impinge on the existing network.

Rooftop	Jamestown Road Apartments, 3 Jamestown Road, Camden, NW1 7BW	E528756, N184013	This option was discounted as this rooftop is a pitched-roof and therefore unsuitable for accommodating the necessary telecoms apparatus.
Rooftop	Holiday Inn, Jamestown Road, Camden, London, NW1 7BY	E528670, N184018	This option was discounted as this rooftop is lower than the proposal at Academic House, and is therefore considered less desirable from a radio planning and coverage perspective.
Rooftop	31 Oval Road, Camden, London, NW1 7DH	E528573, N183936	This option was discounted due to the low rooftop height in relation to surrounding rooftops. Consequently, the coverage achieved from this location will be lower than that achieved from the application site and therefore not considered a viable option.
Rooftop	Mecca Bingo, Camden London, NW1 7HL	E528822, N183844	This option was discounted as it is too far away from the nominal site location and would therefore not provide the required level of mobile coverage. Additionally, this location is considered too close to existing network cell sites and would impinge on the existing network.
Rooftop	RTL, Camden, London, NW1 7DZ	E528595, N184087	This option was discounted due to the lower height of the building compared with the application site. Therefore the achievable coverage from this location is lower than the proposed development at Academic House.
Rooftop	33 Oval Road, Camden, London, NW1 7D	E528558, N183956	This option was discounted due to the lower height of the building compared with the application site. Additionally, rooftop space is restricted and would not be sufficient to accommodate the necessary telecoms equipment.
Rooftop	55 Bar, 31 Jamestown Road, Camden, London, NW1 7DB	E528612, N183961	This option was discounted as this is a pitched rooftop and therefore unsuitable for accommodating the necessary telecoms equipment.

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

N/A

Environmental Information (refer to Section 2 of Site Finder Report):

There is no evidence of protected species at this location, with the surrounding area consisting of large scale development and buildings.

Land use planning designations (if Heritage Statement is required then include here or make reference to attached Heritage Statement):

As noted within section 3 of this statement, the existing application is set on a Grade II Listed (Listing entry 1113236 and within the Regent Canal Conservation Area. The principle of introducing rooftop telecommunications apparatus to this site and wider environment has already been deemed acceptable by the Local Authority who have previously provided both full planning (Ref: 2016/2814/P) and Listed Building Consents (2016/3257/L) for a similar design on this rooftop. This design formed the basis of the proposed development which now sits in front of the Council, with this design modified to allow the provision of new 5G services as well.

Where new installations are required, as is the case with this proposed development, the scale of works has been minimised, where practicable, and due consideration has been given to the local area in terms of minimising any visual impact, hence the proposed GRP screening which will mask the installation of the required equipment cabinets, whilst also achieving the technical requirements of the site.

Paragraph 196 of the NPPF makes clear that *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal”*. The benefits of connectivity have already been noted in preceding sections. This proposal is in the public interest, as has been recognised by the Government and the higher planning authority. When the balancing exercise is applied the findings weigh very much in favour of this small-scale development proposal.

Additional relevant information (include planning policy and material considerations):

## **Policy Context**

### **National Planning Policy Framework (2019) (NPPF)**

The new National Planning Policy Framework came into force in July 2018 replacing the guidance published in March 2012. The guidance has subsequently been updated in February 2019. The NPPF sets out the Government’s planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states *“The purpose of the planning system is to contribute to the achievement of sustainable development”*, and in paragraph 10 that *“at the*

heart of the Framework is a presumption in favour of sustainable development". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

*"a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

For decision-taking (paragraph 11) this means:

*"c) approving development proposals that accord with an up-to-date development plan without delay; or*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*  
*ii. 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."*

Further to this, paragraph 38 states that *"Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area."*

The proposed upgrade will enable the provision of enhanced reliable mobile communications services to the surrounding area of Camden, bringing about substantial public benefit both socially as well as potentially allowing for businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the 'virtual office', thus reducing the need to travel and contributing to the sustainability agenda.

The NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

*"b) infrastructure for transport, **telecommunications** (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"*

Leading on from this, paragraph 112 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 technology (such as 5G) and full fibre broadband connections"*. Again, the proposal is entirely consistent with the aims expressed within the NPPF.

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 113 states 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. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged"*. The upgrade of existing infrastructure to achieve the required coverage enhancements complies fully with the above aim.

It should be noted that paragraph 116 states that *"Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure"*. A certificate of compliance with ICNIRP guidelines is included within this application.

The proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

### **Development Plan Policy**

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

There are no policies relating directly to telecommunications development within the Camden Local Plan (2017). General policies of relevance include D1 (Design) which requires a high standard of development, and policy D2 (Heritage). This policy aims to preserve and enhance Camden's heritage assets, including conservation areas

and listed buildings. Development within conservation areas is required to preserve or enhance the character or appearance of the area.

As there is no specific telecommunications policy within the Camden Local Plan (2017), then greater weight should be given to the National Planning Policy Framework (2019) (NPPF), which, as outlined above, is largely supportive of telecommunications development.

### **Siting and Appearance**

This section should be read in conjunction with the preceding sections of this statement where a description of the application site, technical details and justification for the design and details of the public benefits of the proposal are provided.

As highlighted previously, the proposal seeks to provide local communications and connectivity services through the installation of new telecommunications equipment, on a rooftop where a telecommunications proposal was previously approved by the Council.

It has already been detailed that views of the host building are limited to a relatively small area owing to road layouts, intervening developments, and the large massing of tall buildings. It has further been detailed that views of the proposed telecommunications apparatus from street level will be naturally restricted by the nearby buildings, but also the addition of GRP screening will further mask the proposed rooftop equipment.

The scale of works at this site are of such small scale that any disparity between the existing and proposed views is unlikely to register, whether the viewpoint is from street level or from a neighbouring building. The additional screening provided within the proposal will further assist in reducing any perceived visual impact which this development may cause. The most notable of changes would likely be the installation of antennas and in this regard, given the building's location within the area, it may be considered that this type of development is exactly the type of development that would be expected on a rooftop such as this. As such, the proposal is found to be wholly appropriate and wholly compliant with local and national planning policy.

## Confirmation that submitted drawings have been checked for accuracy

Name: (Agent)	Nick Allan	Telephone:	07376 363038
Operator:	Telefonica UK Ltd and Vodafone Ltd		
Address:	Phoenix House, Pyrford Road, West Byfleet, Surrey, KT14 9ED	Email Address:	Nick.allan@waldontelecom.com
Signed:	N.Allan	Date:	6/8/19
Position:	Town Planner	Company:	Waldon Telecom
		(on behalf of Cornerstone and above operator)	