SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	58 Camden Road	Site Address:	58 Camden Road, London NW1 9DR
National Grid Reference:	529082 184017		
Site Ref Number:	70792	Site Type:[1]	Microcell

2. Pre Application Check List

Site Selection (for New Sites only)
(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

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: N/A – Upgrade		
Were industry site databases checked for suitable sites by the operator:		No
If no explain why: N/A – Upgrade		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	3rd September 2019
Name of contact:	Kate Henry
Summary of outcome/Main issues raised: Following our pre-application mail of 3rd September 2019 Kate Henry commented *that 'the equipment cabinet location looks to be ok in terms of visual impact'.*	

Community Consultation

Rating of Site under Traffic Light Model:			Green

[1] Macro or Micro

Outline of consultation carried out: As above, together with consultation mail to Ward Councillors on 3rd September 2019
Summary of outcome/main issues raised (include copies of relevant correspondence): No feedback received

School/College

Location of site in relation to school/college (include name of school/college): -
Outline of consultation carried out with school/college (include evidence of consultation): -
Summary of outcome/main issues raised (include copies of main correspondence): -

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?		N/A
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		N/A
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	N/A
Date served:	N/A

3. Proposed Development

The proposed site:

58 Camden Road is host to an existing telecommunications installation, by virtue of planning and listed building approvals from 2015, Refs: 2015/3486/P & 2015/4018/L. The building was identified some years ago as a suitable location for a small single microcell installation, in order to provide localised 3G and 4G coverage and capacity for this busy part of London.

This application seeks the installation of 3 no. small cabinets. The equipment requirements in relation to the installation have now changed (given the changes in technology and demand), and this means that the original internal small equipment cabinet is no longer fit for purpose. Unfortunately, given the requirement, there is insufficient internal space to accommodate the need to install 3 new small cabinets. The scheme is as a result of a requirement for Telefonica to provide improved 3G and 4G network capacity and coverage for the area

Enclose map showing the cell centre and adjoining cells if appropriate:
N/A

Type of Structure *(e.g. tower, mast, etc):* Existing public house		
Description: Existing microcell antenna on building frontage. The associated small cabinets are being placed within a rear courtyard area.		
Overall Height: N/A		
Height of existing building *(where applicable): N/A*		Metres
Equipment Housing:		
Length:		2 x 600mm, 1 x 500mm
Width:		2 x 600mm, 1 x 500mm
Height:		2 x 1310mm, 1 x 872mm
Materials *(as applicable):*		
Tower/mast etc – type of material and external colour:	N/A	
Equipment housing – type of material and external colour:	Steel; light grey (RAL 7035)	

Reasons for choice of design, making reference to pre-application responses:
The scheme represents a very simple upgrade of an existing installation of a single microcell antenna. To provide the required improved coverage and capacity, it is necessary to deploy 3 no. small equipment cabinets within a rear yard area.

We do not believe that the subject scheme will have any material or detrimental impact on the historical or architectural features as above. The rear yard area is not generally visible to the public and is somewhat divorced from the main Camden Road frontage. In addition, the rear yard is used predominantly for storage, and the introduction of 3 small cabinets in this context should not be substantive in relation to the listed status of the building

Technical Information

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

The remit of Ofcom also includes investigation and remedy of any reported significant interference. 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.		

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 part of Telefónica's continued network improvement program, there is a specific requirement for an upgrade at this location, in order to maintain and improve 3G and 4G coverage and capacity. The advent of 'smart phones' and other similar devices has seen a substantial increase in traffic, and in locations where local coverage is poor or stretched, the existing base station network needs to be maintained and improved in order to provide sufficient coverage, penetration and capacity.

The above aim can be achieved by installing 3 no. small cabinets in a rera yard area, that is used predominantly for storage.

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)

UPGRADE OF PREVIOUSLY APPROVED SCHEME – NO ALTERNATIVE OPTIONS REALISTICALLY CONSIDERED

Site	Site Name and address	National Grid Reference	Reason for not choosing

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

Previously approved scheme

Environmental Information:

Not within designated Conservation Area, but the building is Grade II listed

Land use planning designations:

Not within designated Conservation Area, but the building is Grade II listed

Additional relevant information:

Siting
We have considered the detailed siting and design carefully to ensure that the scheme has a limited impact on the building and visual amenity. In this case, the installation of 3 no. small equipment cabinets within a rear yard area, as an upgrade to the existing installation, should have no appreciable impact on the building or locality.

Visual appearance
We would repeat that we have carefully placed and designed the scheme to ensure the principles of good siting and appearance are adhered to. The overall impact of the installation on the environment and building is very limited.

As above, the installation of 3 no small cabinets, discreetly located in a rear yard, alongside a boundary fence, and in an arear that is largely used for storage, should have no appreciable effect on the locality.

The rear of the building has perhaps been more dramatically changed than the frontage, and the courtyard area is not generally visible. In this context, we cannot foresee that the scheme will have any impact on the listed status of 58 Camden Road.

This has been agreed during pre-application consultation (see above)

Consultation
In accordance with the industry ’10 commitments’ and the Code of Best Practice, consultation has been completed with the planning department prior to submission of this proposal.

Planning Policy

National Policy
This proposal and the work undertaken prior to submission has had full and proper regard to both central Government guidance and Local Plan Policy.

The National Planning Policy Framework Details Government guidance on planning for telecommunications development. This confirms the principle policy of the Government to facilitate the growth of new and existing telecommunication systems, whilst keeping the environmental impact to a minimum.

Relevant extracts from the (revised) NPPF are as follows:

112. 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.

113. 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. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate

116. 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.

This application includes the requisite ICNIRP certification.

Section 16 of the NPPF seeks to ensure that while designated heritage assets are given due protection, that this should always be balanced against the benefits and importance of the proposal concerned. In particular, paragraph 196:
"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…."

In addition, the recently revised Code of Best Practice (November 2016) also emphasises the government's commitment to improved communications infrastructure and coverage. Relevant extracts from this document are as follows:

1.3 The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development.

2.1 The continued expansion and development of mobile networks is a key element of the National Infrastructure Delivery Plan 2016 – 2021. This recognises that digital communications are now a crucial component of everyday life, with improvements in connectivity being key to a vibrant economy.

2.2 Consumers, businesses and public bodies increasingly rely on mobile communications and expect to receive a signal wherever they are. Coverage in rural areas is recognised as a vital component for maintaining economic activity and social inclusion.

2.3 Recent changes in planning policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed.

2.4 The National Planning Policy Framework ('NPPF') acknowledges that high quality communications infrastructure is essential for sustainable economic growth and sets out the Government's planning policies for England, and how they are expected to be applied.

2.5 The NPPF advises that the purpose of the planning system is to contribute to the achievement of sustainable development, which it states has three dimensions: economic, social and environmental and that local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

3.3 The NPPF is clear that local planning authorities should not seek to prevent competition between operators or question the need for the telecommunications system. The systems tend to be demand-led or to fulfil coverage obligations. With the ever increasing demand for data hungry applications available to a range of connected devices, such as smart phones and tablets, the requirement to upgrade and improve networks through changes to existing sites and the development of new sites is constant. As most parts of the country move onto a superfast highway, so the need to bring coverage to 'not spots' (i.e. areas where there is no mobile coverage from any operator) and improve coverage in 'partial not spots' (i.e. where there is some coverage, but not from all operators) intensifies.

5.8 The mobile telecommunications network is a crucial piece of national infrastructure in economic, community and social terms. However, it is delivered locally, with planning permission, where applicable, being decided by the local planning authorities of England.

5.9 Increasing consumer demand, especially for data is putting demands on mobile operators for improved connectivity and more capacity on their networks. This is driven by the widespread adoption of smartphones and the rapid uptake of tablet devices, and the way consumers are now using them, often choosing to do so when they have a fixed connection available. In addition, the Government has ambitious aspirations for improving connectivity and coverage, especially in rural areas. All these factors result in the need to continually upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely.

It is our view that this particular scheme falls squarely in line with the above guidance and policy

London Plan

The London Plan (March 2016) sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area.

It is considered that the Telefonica network is an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in Policy 4.11 'Encouraging a Connected Economy' of the Plan. Policy 4.11, and its written justification (notably paragraphs 4.56 & 4.57), is clearly supportive of the proposal and the role that it will perform in allowing Telefónica UK Ltd to provide improved 3G and 4G coverage to the surrounding area.

The Mayor's Office works with central government and London's local authorities to ensure that strategic communication networks are enabled rather than inhibited by the planning and other regulatory systems (whilst ensuring the utility works themselves are properly managed).

The Telefonica network is an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

Although still in draft form (revised version published July 2019), we are aware that a new London Plan is being developed, where (at Policy SI6), there remains a requirement to encourage and develop the provision of digital infrastructure, stating that:
"London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration"

In addition:
"Access for network operators to rooftops of new developments should be supported where an improvement to the mobile connectivity of the area can be identified. Where possible, other opportunities to secure mobile connectivity improvements should also be sought through new developments, including for example the creative use of the public realm."

National Infrastructure Commission
In March 2016, the National Infrastructure Commission was asked to consider what the UK needs to do to become a world leader in 5G deployment, and to ensure that the UK can take early advantage of the potential applications of 5G services. It reported as follows:

"The Commission's central finding is that mobile connectivity has become a necessity. The market has driven great advances since the advent of the mobile phone. But Government must now play an active role to ensure that basic services are available wherever we live, work and travel….

The mobile sector contributes an estimated £4.5 billion per annum to national economic output and is a major British industry in its own right, with the four largest mobile operators providing over 35,000 full-time equivalent jobs, and supporting some 140,000 UK jobs overall

The introduction of 4G services, since 2012, has provided access to considerably faster data speeds and lower latency, and given rise to the various new services and applications we are now accustomed to in the smart phone age. This has resulted in an enormous increase in data rate usage per user, as streaming of services, such as video becomes commonplace. 2014 saw total data demand increased by 53 per cent in the UK (per active mobile SIM), similar to the increase seen in 2013.

As a result of these advances and the ability for increasingly sophisticated mobile devices to reach a mass market, mobile telecommunications and mobile services more broadly, are now established at the heart of our society and economy. They have fundamentally changed how we stay in touch, make purchases, view entertainment and participate in wider

networks, and are increasingly important to business, where a digital transformation is underway. Indeed, a basic level of mobile service provision is increasingly regarded as a utility."

Local Plan Policy

In terms of Local Plan Policies, by virtue of Section 70 of the Town & Country Planning Act 1990 [further enshrined in section 38(6) of the Planning and Compulsory Purchase Act 2004], development should be in accordance with development plan policies, unless material considerations indicate otherwise.

Local Plan Policy is now enshrined in the new Camden Local Plan

The new Camden Local Plan was adopted on 3rd July 2017 and has replaced both the adopted Core Strategy and the Development Policies document. However, we note that there is again no discernible telecommunications policy (paragraph 5.10 recognises the importance of digital infrastructure). Given this lack of policy, reliance must be placed on the NPPF, and other national guidance, as above.

In relation to Heritage Assets, Policy D2 continues the theme of the previous Core Strategy and Development Policies in seeking to '*preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets'.* We do not believe that the installation of 3 small equipment cabinets to the rear of the property, in what is effectively a hidden courtyard, will cause any material harm. In particular:

- Local character and context will be unharmed.
- The scheme will have no material or discernible impact on the history, character or architectural features of 58 Camden Road.
- The specific design and location employed in this case, ensures that the main historical and architectural elements of the area will not be impacted

The lack of any formal policy in relation to telecommunications is surprising, given the publication by the Council of the 'Digital Camden' strategy document (2014). Indeed, it states, '*High speed, affordable connectivity, is also vital if Camden and London, as a whole, is going to be competitive in a global economy'.* It goes on to state that a priority is to *'Stimulate high quality, next generation internet connectivity, including wi-fi and broadband, across Camden.*' We would contend that this scheme is clearly in line with these aims.

Health & Safety

We would remind the Council that the Government has set out its clear view on the issue of health and perceived view of health risks in paragraph 116 of the NPPF:

"Local planning authorities must determine applications on planning grounds. They should not…set health safeguards different from the International Commission guidelines for public exposure."

As above, and included within this application, Telefonica have confirmed this installation will be fully ICNIRP compliant.

Conclusion

Telefonica have a clear requirement for an installation within this particular area, to provide improved 3G and 4G network coverage and capacity.

Telefonica considers that the proposed development strikes an appropriate balance between the technical needs of the site and the advantages that this type of technology brings, with the requirement to ensure that any impact on the appearance and character of the area and building is the minimum possible, in accordance with both national and local planning policy and guidance.

Confirmation that submitted drawings have been checked for accuracy

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