SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Southfleet	Site Address:	Rooftop of Southfleet, Malden Road, Belsize Park, Camden, Greater London, NW5 4DH
National Grid Reference:	E 528196, N 184849		
Site Ref Number:	CTIL 150406	Site Type:[1]	Macro

2. Pre Application Check List

Site Selection (for New Sites only)
(Would not generally apply to up 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?	**Yes**	No
If no explain why: N/A		
Were industry site databases checked for suitable sites by the operator:	**Yes**	No
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	January 2019
Name of contact:	Mr John Sheehy & Mr Richard Bond

[1] Macro or Micro

Summary of outcome/Main issues raised:

2.1 A consultation letter, associated plans and proposed consultation plan were sent to Camden London Borough Council via email on 28/11/2019.

2.2 Prior to that, there was a site meeting where a representative of the applicant and Mr Sheehy of London Borough Council were present. Various design issues and options were discussed and there were follow-up discussions. The outcome of discussions can be summarised as follows:

2.3 The local planning authority's principle concern was the visual impact caused by the cluster of antennas which front onto Malden Road, and not the antennas towards the rear of the rooftop. The authority wanted the height that these antennas protrude above the building to be reduced, or ideally for these antennas to be face-mounted onto the front wall of the building and coloured black. The authority also requested that the proposed equipment housing be relocated away from the front elevation of the building to make it less visible.

2.4 In response, the design was revised so that the antennas which front Malden Road had their height reduced by 1m. The equipment housing was also relocated away from the Malden Road elevation to make it less visible from ground-level. Face-mounting the antennas onto the wall of the front elevation was investigated, however the operator's radio planner advised that such a design would not provide sufficient antenna height to enable effective radio coverage to be provided to the surrounding area. The face-mounting design would also mean siting antennas in close proximity to the balconies of the host residential building which may cause operational issues. The antennas must be sited at the height proposed in order to provide effective radio coverage.

2.5 Finally, Mr Richard Bond (advisor to Camden London Borough Council) suggested that visual impact would be best mitigated by the addition of Glass Reinforced Plastic (GRP) screening. The proposed design includes this screening which features a brick-like pattern, mimicking the brickwork of the host building, which will shroud the proposed equipment entirely. The equipment will not be visible to the public. Instead, the development will appear as a brick wall extension to the building.

Community Consultation

Rating of Site under Traffic Light Model:	Red	**Amber**	Green

Outline of consultation carried out:

2.6 The proposal was rated Amber in accordance with the traffic light consultation model in the Code of Best Practice on Mobile Network Development (published 2016). The pre-application consultation plan adhered to best practice guidance.

2.7 Consultation letters which explained the proposal and included the agent's contact details, along with a copy of the proposed plans, were sent to the Council Members for Haverstock Ward and to the Member of Parliament for Holborn and St Pancras on 28/11/2019.

2.8 Consultation notices were also voluntarily erected at four public locations near to the application site. The notices advised of the applicant's intent to submit a planning application and included a description of the development, site address and agent's contact details should members of the community had required further information. The notices were erected onto lampposts and trees on Malden Road on 28/11/2019. Further information on the consultation undertaken can be provided on request.

Summary of outcome/main issues raised (include copies of relevant correspondence):

2.9 One consultation response had been received at the time of writing. Councillor Alison Kelly sent an email response on 28/11/2019 and stated "I strongly object to the proposal and to the fact you are doing this during an election period." The Councillor requested that the process be delayed until after Christmas [2019].

2.10 The agent replied to the councillor on 02/12/2019 to advise that there is consultation because there is a proposal to change the design at the site and submit an application for consent. There was no further correspondence between the councillor and the agent at the time of writing. Lines of communication between the agent and the community will remain open throughout the application process.

School/College

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

The following educational facilities were identified in the local area by using Ofsted data (including approximate distance from site):

- Sunshine Day Nursery, The CarAf Centre, 27-30 Cherition, Queens Crescent, London, NW5 4EZ (81m)
- Rhyl Primary School, Rhyl Street, London, NW5 3HB (114m);
- Woodentots Montessori Nature Nursery, Thanet Youth Club, Malden Hall, London, NW5 4HD (162m)

Outline of consultation carried out with school/college (include evidence of consultation):

Consultation letters, which explained the proposal and included the agent's contact details, were sent to the above list of schools on 28/11/2019. A copy of the email sent to one of the schools, by way of an example and evidence of consultation, is appended to this report. Further evidence of the consultation undertaken can be provided on request.

Summary of outcome/main issues raised (include copies of main correspondence):

A consultation response had not been received from any of the schools at the time of writing. Lines of communication will remain open throughout the application process.

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	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response: This is not an application for prior approval. Section N/A.		

Developer's Notice

Copy of Developer's Notice enclosed?		Yes	**No**
Date served:	11/12/2019		

3. Proposed Development

The proposed site:

3.1 The application site is on the roof-top of a multi-storey residential apartment block named Southfleet. The building has a contemporary brick design and flat rooftop with handrailing around the edge. The front elevation of the building fronts onto the B517 Maiden Road and there is a courtyard and more apartment blocks at the rear. There is soft landscaping, including mature trees, at the building's front elevation. The application site presently accommodates 6No. antennas and ancillary apparatus.

3.2 The building is set within an area which has a mixture of development patterns and land use is predominately residential. There are also typical amenities such as local shops and public houses. The building is situated approximately 400m west of Kentish Town train station. The building is not listed for its historic significance and does not fall within any environmental or heritage designation, such as a conservation area.

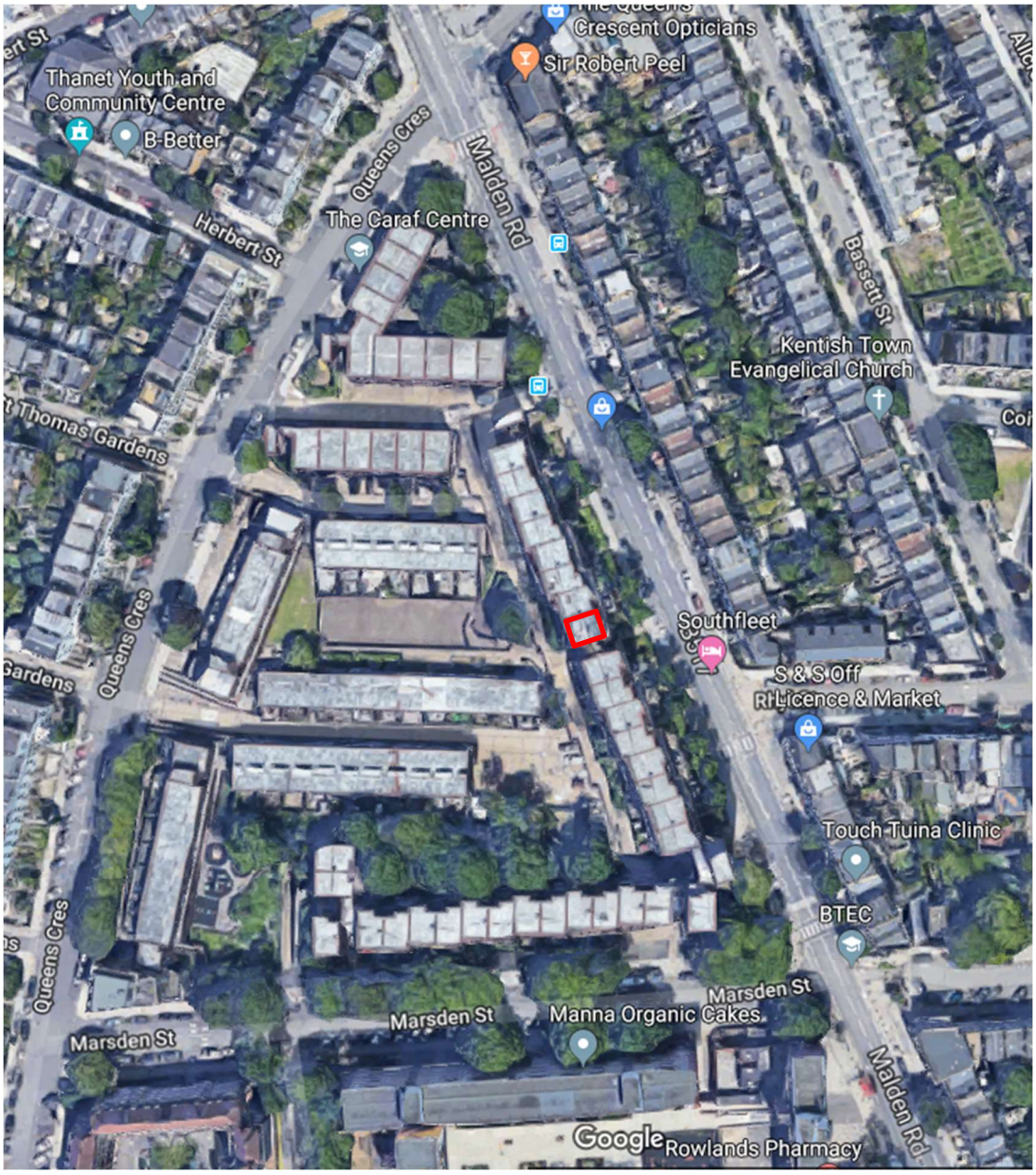


Figure 1. Aerial view of application site. Map source: Google.

Enclose map showing the cell centre and adjoining cells if appropriate:
Network information is provided separately within this application.

Type of Structure *(e.g. tower, mast, etc):*	
Description: Proposed removal of 6No. antennas, installation of 12No. upgraded antennas, 2No. 600mm dish, 1No. 600mm dish, and 6No. equipment cabinets all behind proposed GRP shroud on building rooftop, plus ancillary works. Ancillary development includes supporting steelwork, fixings, cable trays and electrical amplifiers. Please refer to the submitted arrangement plans for full details. <u>Equipment housing dimensions</u> 42U Racks – 420mm x 449mm x 133mm ERS Racks – 127mm x 298mm x 351mm	
Overall Height:	
Height of existing building *(where applicable):*	Approx. 18.5 Metres
Equipment Housing:	
Length:	
Width:	
Height:	
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Antennas & dishes to be supported by steel poles which have a galvanised finish, all located behind proposed screening.
Equipment housing – type of material and external colour:	Housing would be coloured white/grey and would be located behind proposed screening. Cumulative volume of housing would be within permitted development rights.

Reasons for choice of design, making reference to pre-application responses:
<u>Antennas, dishes & supports</u> 3.3 The proposal is to upgrade a mobile base-station within the cellular network. The aim is to improve coverage of 2G, 3G and 4G services in the surrounding area. The proposal would also introduce new 5G technology which has ultra-fast mobile connectivity and can operate the 'Internet of Things'. The proposal would provide higher mobile down-load speeds and more reliable, quicker mobile phone connections. There would be increased capacity to provide services to a higher number of people at the same time. 3.4 The amount of equipment proposed, its layout and design are based on the principle of meeting operational requirements whilst minimising impact on the appearance of the host building, and on the visual amenity of the surrounding area, as far as practicable. 3.5 Consistent with local and national policy objectives, the mobile operators Telefonica (O2) and Vodafone would both improve their service provisions by sharing a single site, the application site. This is opposed to the alternative arrangement which would be each operator establishing their own site independently in the local area. 3.6 The proposed antennas emit the radio coverage which enables connectivity for mobile devices such as phones and tablets. The antennas are strategically positioned on the rooftop so they can collectively provide 360-degree coverage to the surrounding area. In order to provide multiple services (2G, 3G etc), each operator requires 6No. antennas. This amounts to 12No. antennas in total, accounting for the two operators.

3.7 The antennas must be allowed to unrestrictedly emit a radio signal meaning they need to be sited at a high position on top of the building to ensure that the radio signal clears other surrounding structures, such as buildings and trees, with the aim of reducing signal interference. The radio frequencies that 5G operates at is particularly sensitive to interference which has also influenced the height of the antennas. Reducing the height of the antennas any lower than proposed would not allow effective radio operation.

3.8 In the same regard as the antennas, the position of the proposed dishes is informed by physical constraints of the rooftop and the outcome of software modelling. The dishes must connect to other base-stations in the wider network by microwave link. As such, they require 'line of sight' which is an unobstructed path to neighbouring base-stations.

3.9 The aforementioned factors have informed the design of the proposed equipment which is of the minimum amount and scale possible, while still meeting structural and radio planning requirements.

Figure 2. Photograph of application site and apparatus to be replaced.

Equipment housing

3.10 The proposed antennas must connect to the proposed equipment housing by electrical cable feeders. The equipment housing forms an essential component of the base-station and must be located as close to the antennas as possible in order to minimise electrical power losses during operation. This means that they should be on top of, or immediately next to the roof-top and not at ground-level.

3.11 It is proposed to install the equipment housing next to the antennas and onto a steel grillage. The housing, in the same regard as all proposed apparatus, would be located behind the proposed shrouding and therefore screened from public view The layout will allow effective operation and will protect the appearance of the host building and the visual amenity of the surrounding area.

Glass Reinforced Plastic shroud

3.12 The installation of a shroud to surround the proposed apparatus would effectively screen the apparatus from public view. The shroud would be made of glass reinforced plastic (GRP) because the radio waves can effectively pass through this material. The shroud would be manufactured and installed by a specialist contractor and would feature a brick pattern which mimics the brickwork of the host building in terms of design and appearance.

3.13 The shroud would disguise the presence of the upgraded base-station and arguably presents a visual improvement compared to the present arrangement which has unscreened antennas visible from the surrounding area. The shroud element of the design means that the whole proposal would appear as a modification to the building itself. The position of the shroud located centrally in between the raised stairwells of the building is significant in that it allows continuity of the roofline. The height of the shroud respects the existing roofline and would be below the highest part of the building. Please refer to photomontage images enclosed.

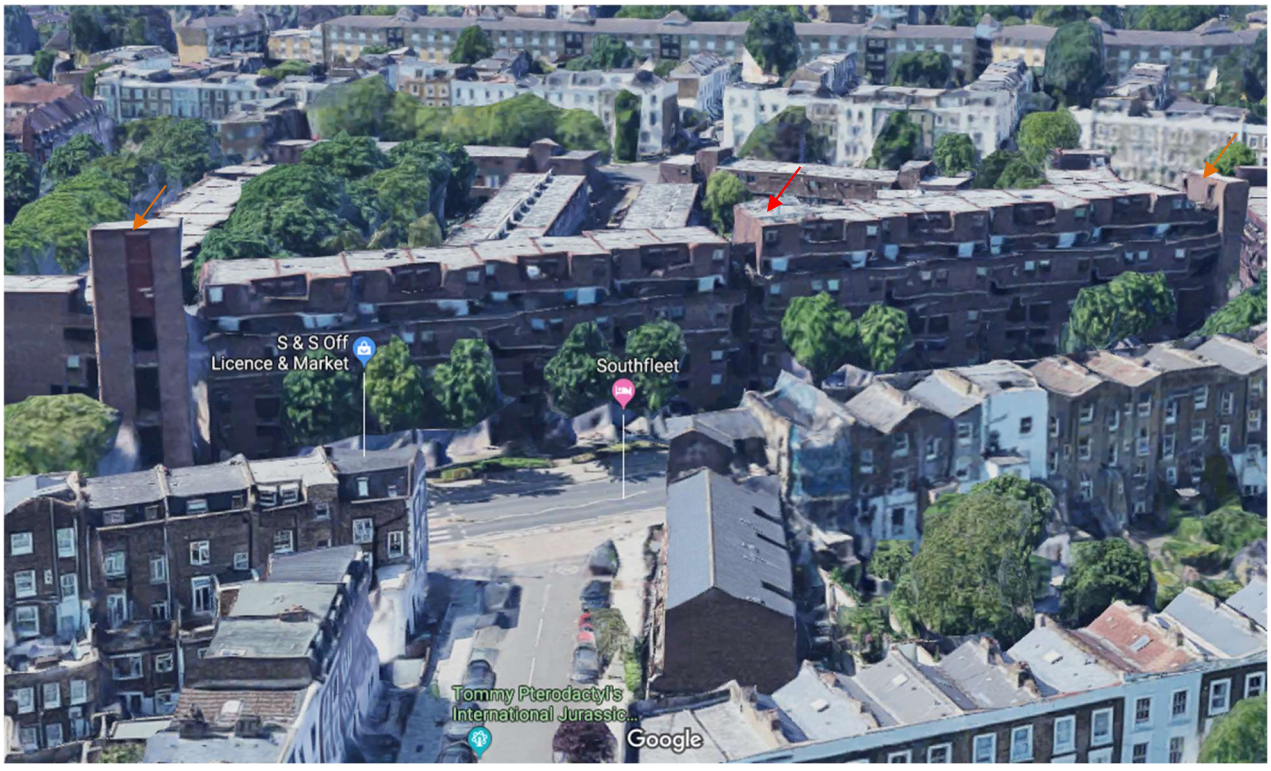


Figure 3. 3D image showing location of application site & proposed shroud relative to raised stairwells.

Figure 4. Photographs of building's stairwell and existing antennas to be removed/replaced.

Technical Information

	Yes	No
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 and Vodafone operate their networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of Telefonica and Vodafone's networks, 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. 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.

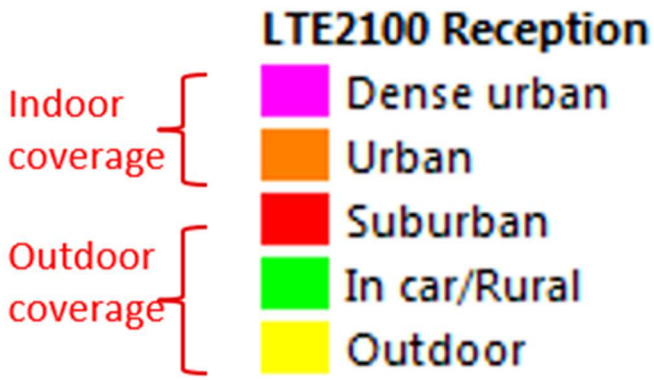
Reason(s) why site required e.g. coverage, upgrade, capacity

4.1 The proposal is to upgrade a mobile base-station within the cellular network, to be operated by Telefonica (O2) and Vodafone – two major licenced mobile operators in the UK. The aim is to improve coverage of 2G, 3G and 4G services in the surrounding area. The proposal would also introduce new 5G technology which has ultra-fast mobile connectivity and can operate the 'Internet of Things'. The proposal would provide higher mobile down-load speeds and more reliable, quicker mobile phone connections. There would be increased capacity to provide services to a higher number of people at the same time.

4.2 The expectations are that future telecoms technology will support government policy regarding digital inclusion; improvements in health and social care; assisting in local economic growth; advancing the development of Smart Cities and supporting innovative uses throughout the transport sector for both personal and public travel.

4.3 Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other by cables or wireless technology to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. There are several variables that determine the size and shape of each cell. Base stations are low powered radio transmitters which have a limited range, meaning that they need to be located close to the area requiring coverage.

4.4 The images below are extracts from radio modelling software which compare Vodafone's 4G mobile broadband coverage with/without the proposed upgrade. Figure 5 is the existing coverage pattern because Vodafone does not have apparatus at the site and is therefore not providing services from the site. Figure 6 shows the modelled improvement in coverage should the upgraded base-station be granted planning permission. The models show that the geographical area surrounding the application site would go from receiving signal strength sufficient to provide adequate service when 'outdoor or in a car' (green) to the highest signal strength currently available which is sufficient to provide service in an 'indoor dense urban area' (pink). A complete set of radio coverage plots for both operators are enclosed.



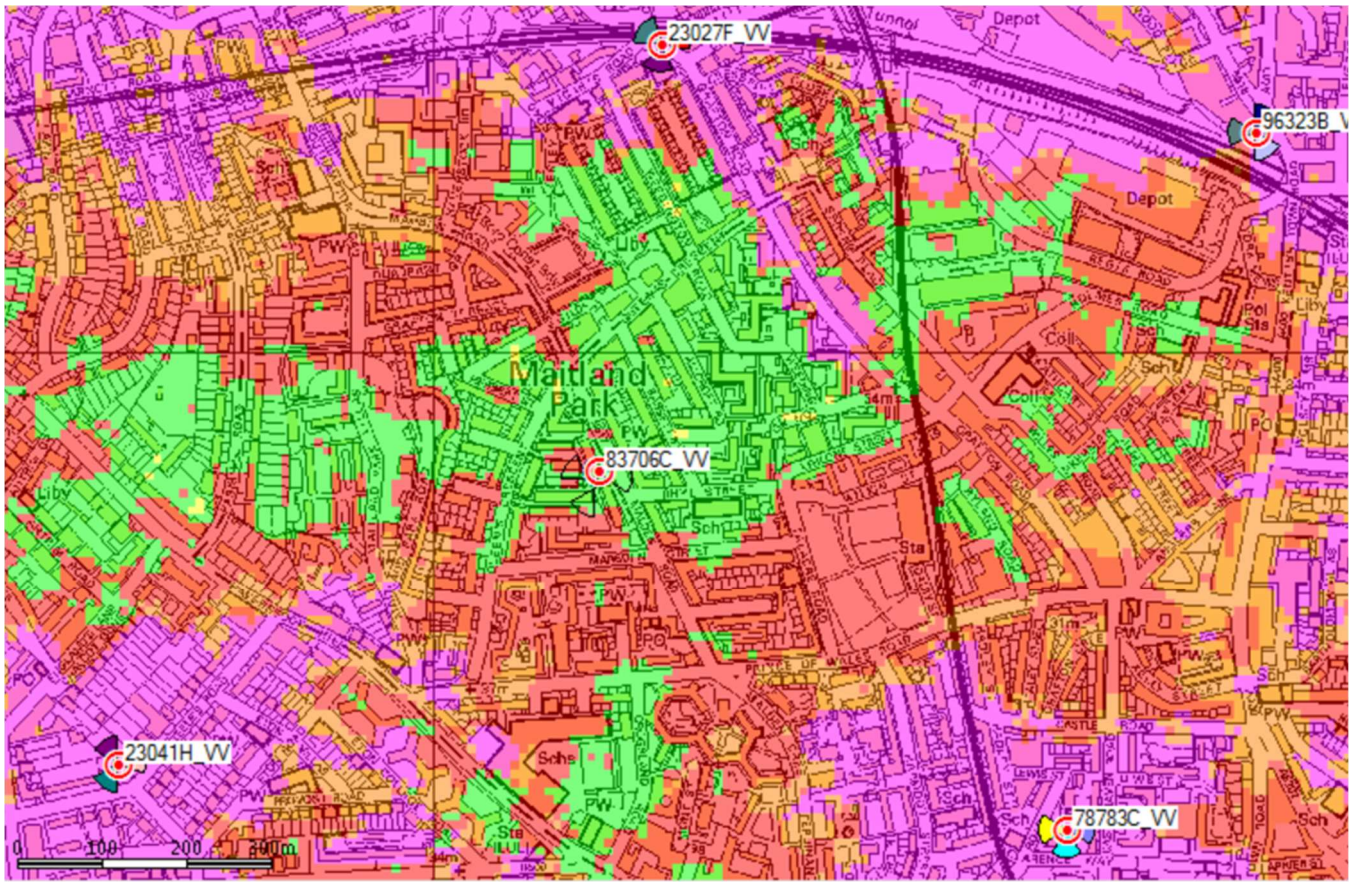


Figure 5. Vodafone's existing 4G mobile broadband coverage, without the upgrade.

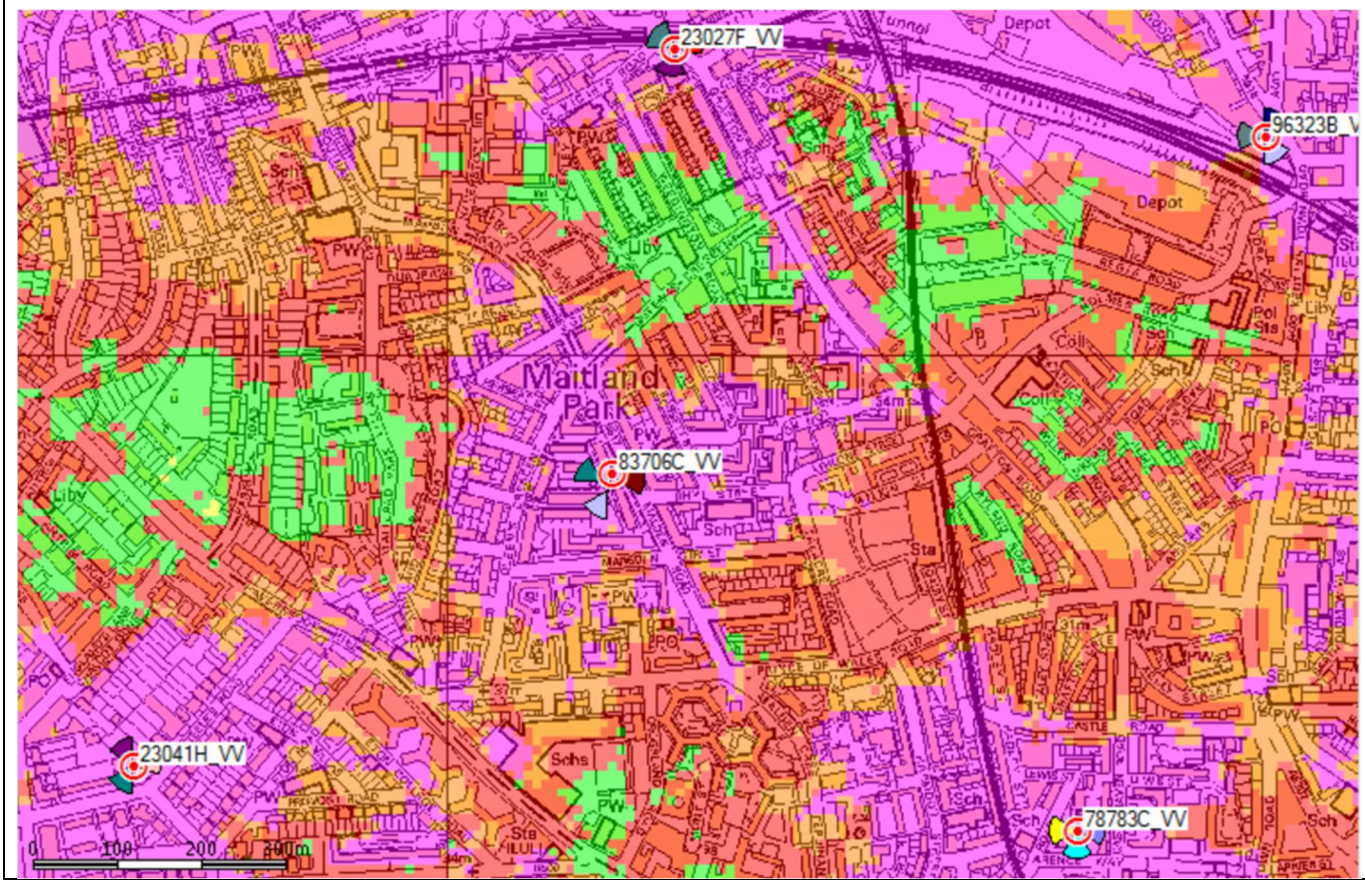


Figure 6. Vodafone's modelled 4G mobile broadband coverage, with the upgrade.

1. 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
N/A	N/A	N/A	N/A

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

1.1 The proposal is for the upgrade to an existing base-station site and to facilitate a site sharing arrangement with another mobile operator. Therefore, in accordance with this industry site specific supplementary information form, as taken from the Code of Best Practice on Mobile Network Development (published 2016), the consideration of alternative sites is not generally considered necessary.

1.2 The National Planning Policy Framework stipulates:

> *'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.'* (para. 113)

1.3 The site sharing proposal would ensure that the number of sites required to provide communications coverage is kept to a minimum. New electronic communications capability would be provided through the use of a building which already accommodates existing apparatus. The proposal therefore adheres to para. 133 of the NPPF.

1.4 The alternative to the proposed siting arrangement would be to establish a new and additional base-station in the local area. Such a proposal would result in multiple masts across multiple sites and would be contrary to the NPPF, para. 113.

1.5 Should such as multiple site arrangement be followed, regardless of the policy contravention, it is important to understand that the secondary site would need to be located within very close proximity to the existing primary site in order to replicate its radio coverage pattern. Otherwise customers within the cell would not receive effective coverage for all the services they are expecting I.e. 2G, 3G, 4G & 5G.

1.6 When surveying the surrounding area with consideration to establishing a secondary site, a suitable candidate cannot be identified. A high-level building with a flat rooftop would, capable of meeting radio and engineering requirements without impacting residential amenity or heritage assets would be required. In particular, conservation areas cover about 50% of Camden and the borough has over 5,600 nationally listed buildings[2]. These are some of the reasons why the application site was selected to host the existing base-station.

[2] London Borough of Camden Council website.

Figure 7. 3D image of application site and local context. Map Source: Google

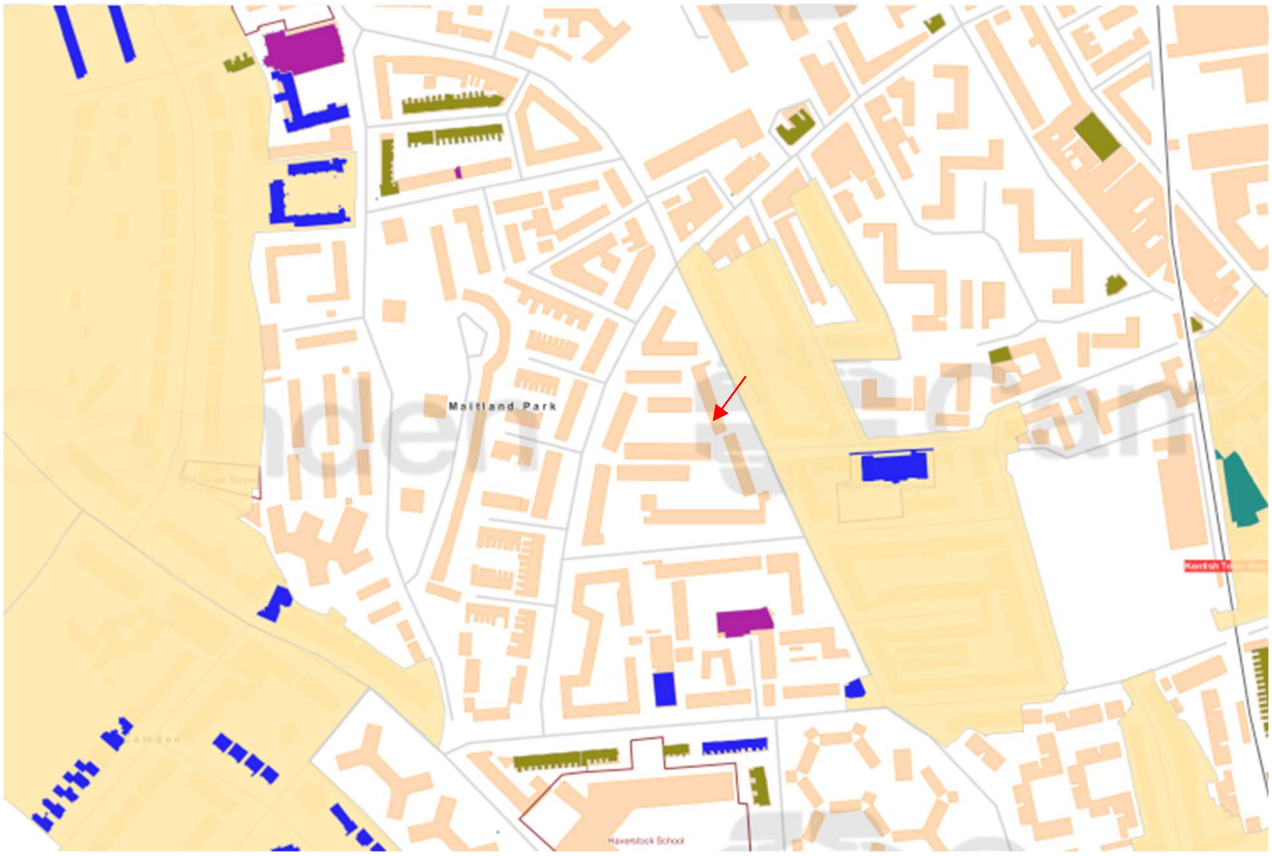


Figure 8. Camden Conservation Areas (shaded pink)/listed buildings in relation to application site. Map Source: London Borough of Camden Council.

Environmental Information:

6.1 The application site does not fall within any environmental or heritage designation. In particular, the proposal enables improved communication services to be provided to the residents and businesses of neighbouring conservation areas, whilst ensuring the character and appearance of these historic areas is protected.

6.2 A key consideration of the proposal is the impact on the appearance of the surrounding area. This impact would be mitigated to a high degree by the installation of a shroud to screen all proposed apparatus. The shroud would disguise the presence of the upgraded base-station and arguably presents a visual improvement compared to the existing antennas which are visible from the surrounding area.

6.3 The shroud element of the design means that the whole proposal would appear as a modification to the building itself. The position of the shroud located centrally in between the raised stairwells of the building is significant in that it allows continuity of the roofline. The height of the shroud respects the existing roofline and would be below the highest part of the building. Please refer to photomontage images enclosed.

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

7.1 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. 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.

7.2 Camden's Development Plan includes the Camden Local Plan (adopted 2017), Policies Map (updated March 2019) and The London Plan (adopted 2016). The application site does not fall within any land allocation or designated area. It is relevant that the application site does not have any of the built environment designations such as being within a 'Designated View'. The proposal is to improve communications infrastructure, making the policies copied below particularly relevant in determining the application.

Camden Local Plan

I POLICY G1 DELIVERY AND LOCATION OF GROWTH

'The Council will create the conditions for growth to ***deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs*** *and harness the benefits for those who live and work in the borough'*

I POLICY DM1 DELIVERY AND MONITORING

'The Council will deliver the vision, objectives and policies of the Local Plan by working with relevant providers to ***ensure that necessary infrastructure is secured to support Camden's growth*** *and provide the facilities needed for the borough's communities'*

I ENSURING NECESSARY INFRASTRUCTURE IS PROVIDED TO SUPPORT GROWTH

'It is vital that the transport facilities and services, utilities and social infrastructure needed to make development work and support local communities are provided*, particularly in the parts of the borough that will experience most growth in future years.*

In order to support growth in the borough, the Council will safeguard and improve essential social, physical and green infrastructure and work with service providers to ***ensure the timely delivery of the new and enhanced infrastructure*** *needed to ensure that the quality of life of Camden's residents and workers is not harmed.'* (para. 11.9 & 11.10)

The London Plan

POLICY 4.11 ENCOURAGING A CONNECTED ECONOMY

'The Mayor and the GLA Group will, and all other strategic agencies should:

***'facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity** across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive connectivity meeting the needs of small and larger enterprises and individuals'*

support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits.'

*'Successful service-based economies like London increasingly depend upon infrastructure facilitating rapid transfer of information, speedy and easy access to advice and services and a flexible approach to where work takes place and when. **This can also help deliver wider planning objectives, such as reducing congestion on traffic networks at peak hours by supporting forms of home working and facilitating greater economic development in outer London**. Increasingly, this will mean looking to the infrastructure needed to support 'ubiquitous networks' – those supporting use of a range of devices to access ICT services beyond desk based personal computers, and the Mayor will examine the planning issues these might raise.'* (para. 4.56)

*'**The Mayor wishes to ensure sufficient ICT connectivity to enable communication and data transfer within London, and between London, the rest of the UK and globally**. He will work with infrastructure providers, developers and other stakeholders to support competitive choice and access to communications technology, not just in strategic business locations but more broadly for firms and residents elsewhere in inner and outer London, and to address e-exclusion, especially among disadvantaged groups and small and medium sized enterprises. In particular, he will support the development and extension of high speed connectivity…'* (para. 4.57)

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

National Policy

8.1 National policy documents and government strategies are material considerations in determining planning applications. The extracts below support the improvement of communications infrastructure which this proposal would delivery.

National Planning Policy Framework

*'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.'* (para. 112)

*'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.**'* (para. 113)

'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.' (para. 116)

UK Digital Strategy

The UK Digital Strategy was published by the Department for Digital, Culture, Media & Sport in March 2017.

*'**Broadband and mobile must be treated as the fourth utility, with everyone benefiting from improved connectivity**. This will play a crucial role in ensuring that everyone, wherever they live and however they connect, can make full use of digital services and benefit from participation in the digital economy. **Improved connectivity also increases innovation and productivity across the economy, bringing significant economic rewards'***

*'**5G is the next generation of mobile connectivity**, and is currently in development**. It is expected to represent a significant upgrade: providing ultrafast, low latency, and more reliable mobile connectivity, able to handle our ever-increasing data requirements**. This should present huge opportunities to boost productivity and grow the economy. In addition to giving consumers and business users high quality connectivity, **it will also support the development of the Internet of Things: the rapidly-increasing number of connected devices, from connected cars to digital health applications.**'*

Future Telecoms Infrastructure Review

The Department for Digital, Culture, Media & Sport published its findings of the Government's Future Telecoms Infrastructure Review in July 2018.

*'Alongside finishing the roll out of 4G networks to meet existing mobile demand, we want the UK to be a world leader in 5G to take early advantage of this new technology. **We have set a target that the majority of the population will have 5G coverage by 2027**.'*

*'The technical capabilities and performance characteristics of 5G are clear. **5G is expected to deliver faster and better mobile broadband services to consumers and businesses, and to enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare**.'* (p 10)

Other material considerations

8.2 Appeal decisions for the installation of communications apparatus are material in determining this application. It should be noted that these proposals were for the installation of new ground-based masts at new sites. This proposal is for replacement building-based apparatus at an existing site which should carry significant weight in favour of the proposal. A key element of this proposal is to increase the capacity of services. The first case detailed below was also within a conservation area, unlike the application site.

*'In considering the need for the proposal, Government policy, as set out in the Framework states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. In this respect, **I have found that there is a need for the proposal which therefore weighs strongly in its favour**…. I conclude on this issue that despite the less than substantial harm that would be caused, the public benefits of the proposal would outweigh that harm.'*
(ref. APP/Q3305/W/18/3206555)

*'**The Government places a high priority on the provision of high-quality communications**. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "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…" **The Council has commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network**. I attach significant weight to the public benefit arising from the continuation of local service provision…. **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**.'*
(ref. APP/L1765/W/18/3197522)

Summary

9.1 The application seeks planning permission for the installation of replacement electronic communications on the rooftop of an apartment building named Southfleet, Camden. The upgraded base-station will form an important part of the cellular network for customers of Telefonica (O2) and Vodafone.

9.2 The aim is to improve coverage of 2G, 3G and 4G services in the surrounding area. The proposal would also introduce new 5G technology which has ultra-fast mobile connectivity and can operate the 'Internet of Things'. The proposal would provide higher mobile down-load speeds and more reliable, quicker mobile phone connections. There would be increased capacity to provide services to a higher number of people at the same time.

9.3 The site sharing proposal would ensure that the number of sites required to provide communications coverage is kept to a minimum. New electronic communications capability would be provided through the use of a building which accommodates existing apparatus. The proposal therefore adheres to para. 133 of the NPPF. The equipment layout and design are based on the principle of meeting operational requirements whilst minimising impact on the visual and residential amenity of the surrounding area.

9.4 The application site does not fall within any environmental or heritage designation. In particular, the proposal enables improved communication services to be provided to the residents and businesses of neighbouring conservation areas, whilst ensuring the character and appearance of these historic areas is protected. In particular, the design features a shroud which would screen the apparatus from public view and protect the appearance of the building and surrounding area.

9.5 The improvement of communication services to the surrounding area would contribute to the delivery of a diverse range of benefits with respect to improved digital inclusion, health and social care, economic growth, smart cities and transportation. It is considered that these benefits would outweigh the visual changes at the site.

Confirmation that submitted drawings have been checked for accuracy

Name: (Agent)	Mark Flaherty MRTPI, Waldon Telecom	Telephone:	01932 411011
Operator:	Vodafone Ltd and Telefonica UK Ltd		
Address:	C/o Agent	Email Address:	Mark.flaherty@waldontelecom.com
		Date:	19/12/2019
Signed:	M. Flaherty	Company:	Waldon Telecom
Position:	Senior Planner	(on behalf of Cornerstone and the above operator)	Waldon Telecom (Agent) 101 Phoenix House Pyford Rd West Byfleet KT14 6RA

APPENDIX A

Evidence of consultation with schools.

From: Matthew Stuart
Sent: 28 November 2019 09:47
To: admin@rhylprim.camden.sch.uk
Subject: Proposed telecommunications upgrade -Southfleet, Malden Road, Camden, London, NW5 4DH (Our ref: PC/CTIL_150406 22) – Rhyl Primary Headteacher
Attachments: CTIL_150406 22 Planning Consultation Letter to Schools V.1 - Headteacher.pdf

Dear the Headteacher of Rhyl Primary School,

I am writing on behalf of Cornerstone, Telefónica and Vodafone with regards to the existing telecommunications site located at Southfleet, Malden Road, Camden, London, NW5 4DH (NGR: 528196, 184849).

Telefónica and Vodafone have identified a requirement for an upgrade to this existing installation to improve network coverage within the surrounding area.

Please find the attached Consultation letter in regards to the proposed alterations to the existing Telefónica and Vodafone site on Malden Road.

Kind regards
Matthew Stuart

Matthew Stuart
Acquisition Project Coordinator
Waldon Telecom Ltd.
01932 411061 | 01932 411012
waldon:
Phoenix House | Pyrford Road | West Byfleet | Surrey | KT14 6RA

Without Prejudice and Subject to Contract

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Our Ref: PC/CTIL_150406 22

To Ms Helen Connor
Headteacher of Rhyl Primary School
Rhyl Street
London
NW5 3HB

Thursday 28th November 2019

BY EMAIL

Dear Ms Connor,

PROPOSED BASE STATION UPGRADE AT CTIL_150406 22, TEF_72467, 83706, SOUTHFLEET, MALDEN ROAD, CAMDEN, LONDON, NW5 4DH (NGR: 528196, 184849)

Telefónica UK Limited has entered into an agreement with Vodafone Limited pursuant to which the two companies plan to jointly operate and manage a single network grid across the UK. These arrangements will be overseen by Cornerstone Telecommunications Infrastructure Ltd (Cornerstone) which is a joint venture company owned by Telefónica UK Limited and Vodafone Limited.

This agreement allows both organisations to:

- pool their basic network infrastructure, while running two, independent, nationwide networks
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development.

Cornerstone, Telefonica and Vodafone identified this site as suitable for an equipment upgrade. The purpose of this letter is to provide you with information on the proposal and the opportunity for you to seek further information should you wish to do so.

As part of Telefónica and Vodafone's continued network improvement program there is a specific requirement for a radio base station at this location to provide new and improved 2G, 3G, 4G and 5G network coverage for Telefonica and Vodafone in the area.

The proposal, which we feel is the best solution to serve our customers in the local community, will include: The proposed upgrade consists of the replacement 6No. antennas with 12No. antennas, the installation of 2No. 600mm dishes & 1No. 300mm dish, the relocation of 1No. cabinet, the installation of 5No. cabinets and ancillary development enclosed within a GRP shroud. This option has been chosen as it utilises an existing installation which will improve coverage with minimal changes to the equipment, reducing the visual impact on the surrounding area as far as technically possible.

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All Telefónica and Vodafone installations are designed to be fully compliant with the public exposure guidelines established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines have the support of UK Government, the European Union and they also have the formal backing of the World Health Organisation. A certificate of ICNIRP compliance will be included within the planning submission. In fact, because of the very low power utilised by telecommunications sites the emissions will be many times lower than the ICNIRP threshold.

We would welcome your views (within 14 days of the date of this letter) before we finalise the proposal and submit the planning application to the Local Planning Authority.

Yours sincerely,

Peter Cherry
Waldon Telecom Ltd.
(for and on behalf of Cornerstone, Vodafone Ltd and Telefónica UK Ltd)
Email: peter.cherry@waldontelecom.com