

Our ref: Cell no. 208257_21
P20-0202

28 January 2020

Joshua Ogunleye
Planning Services
London Borough of Camden Council
Pancras Square
London
N1C 4AG

Dear Mr Ogunleye,

REQUEST FOR PRE-APPLICATION ADVICE
PROPOSED BASE STATION INSTALLATION AT Highstone Mansion, 84 Camden Road, London, NW1 9DY

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; and
- significantly reduce the environmental impact of network development.

Telefonica and Vodafone are in the process of progressing a suitable site along Camden Road, near Camden Road Overground Station for a radio base station to significantly improve network coverage across multiple networks and deliver reliable mobile digital connectivity to this part of Camden. We aim to work with you to progress a proposal that is both acceptable in town planning terms and meets Telefonica and Vodafone's technical network requirements. This approach accords with the operator's Best Practice Commitments to ensure consultation with Local Planning Authorities and other appropriate key stakeholders.

Pegasus Group has been instructed by NET Coverage Solutions in conjunction with Cornerstone Telecommunications Infrastructure Limited to submit a formal request for pre-application planning advice in respect of the deployment of telecommunications equipment and associated infrastructure at Highstone Mansion, 84 Camden Road, NW1 9DY (the proposal site). NET Coverage Solutions Ltd is a multi-disciplinary company that specialise in the design, build and installation of mobile coverage solutions for mobile operators. This letter invites you to provide comments on the proposal in line with telecommunications best practice commitments prior to a formal planning submission.

Camden's Head of Planning and Head of Enforcement met with Cornerstones' representatives on 19/06/2019. It was agreed at this meeting that Cornerstone would batch together sites for pre-application advice under a single pre-app fee, given Camden's preapp fee is more than twice the fee for a telecommunications application. Each pre-app request would then be discussed at a meeting between the Case Officer and Cornerstone's agent. Accordingly, Net Coverage Solutions intend to shortly submit a second request for pre-application advice for a telecommunications elsewhere in Camden. This request will be sent to Camden Planning Department under separate cover.

In light of the meeting held on the 19/06/2019, the pre-application enquiry to accompany Highstone Mansions, 84 Camden Road (this letter) is 25 Hampstead High Street, London, NW3 1QJ. As previously stated, the pre-application request will be submitted to Camden Planning Department under a separate cover.

The proposal site is a seven-storey building with a plant room atop the roof set back from the main elevations of the building. The proposed elevation drawings submitted with this pre-application request show the main roof level is 20.20m above ground level with the top of the plant room at 22.60m above ground level. The building is of modern design and construction, being primarily finished in brick cladding.

Beyond the plant room, there are no other roof top features. The plant room itself is set back approximately 4m from the main façade of the building, centrally on the roof. Due to this siting the plant room is not an obvious feature when viewed from ground level. The building is not listed but does fall within the Regents Canal Conservation Area. It is noted that the bridge crossing Regents Canal, immediately adjacent to the site, is grade II listed.

Draft drawings are included under cover of this letter and are as follows:

- i. Site Location Maps (drg. no. 100);
- ii. Proposed Site Plan (drg. no. 200); and
- iii. Proposed West Elevation (drg. no. 300).

The proposal is split into two distinct main elements, 3no. cabinets situated immediately adjacent to the plant room at roof level and 12no. antennas situated atop the existing rooftop, fixed to the existing parapet wall. Other ancillary infrastructure will also be provided such as cabling, communication dish, handrails and radio signal amplification equipment (RRUs).

The cabinets are proposed to be situated immediately adjacent to and fixed to the existing plant room within the centre of the roofspace at Highstone Mansion. Each cabinet would be approximately 2m in height and 0.8m in width. The cabinets would not prejudice the ability of maintenance works to be undertaken. The cabinets themselves will not make any discernible noise and would be largely hidden from view from Camden Road by virtue of the existing parapet wall and their setback within the roof space. On this basis, the cabinet element of the proposal is considered not to be contentious.

12no. antennas are proposed atop the roof arranged in a formation that will provide 360 degree coverage to the area surrounding Highstone Mansion. In broad terms, the antennas are orientated to face north east (4no.), north west (4no.) and south (4no.). The top of the proposed antennas is 23.40m, 3.20m above the roof level. Part of the supporting structure of the antennas would be hidden from view by virtue of the existing parapet wall but the majority of the antennas themselves would sit above the level of the parapet roof. The specific reason for the antenna height is that it's required to send the network signal over the roof level to the target area, and for this reason, the antennas cannot be positioned any lower. Lower antennas would mean that any signal would clip the roof and be prevented from propagating in an efficient manner by the presence of other urban clutter.

As part of Telefonica and Vodafone's continued network improvement program, there is a specific requirement for a radio base station at this location to improve coverage to the Camden Road area. The need for the proposed development has materialised from the requirement in uplift in mobile coverage within this specific part of Camden where uptake in mobile phone usage has increased rapidly in recent years placing additional demands on the communication network. Where new base stations are not deployed to meet increases in demands this results in an ineffective network that prevents the effective access to the digital communications network and all of the benefits this brings.

The design has taken advantage of the location of the plant room to position the cabinets away from the edge of the roof and central to the building. Antennas have taken advantage of the existing parapet wall, which will mean the visibility of the equipment is diminished from street level views within the conservation area.

Given the cabinets are totally hidden from view and the supporting antenna structures are partially hidden from view at street level, the proposal constitutes a design response that is appropriate within a conservation area setting. Other designs were considered by the applicant and subsequently discounted as being more visually intrusive than what is proposed. These included a single steel lattice type mast situated in the centre of the plant room and single antennas fixed to the exterior of the building. The single mast solution was considered and discounted from on the basis that it was doubtful the plant room could safely support the weight of such a structure and that it may compromise the overall safety of the building.

It was evaluated that a significant 'stub mast' style structure above the plant room of approximately 4-6m would be required to provide the antennas and comply with relevant ICNIRP guidelines. Such a structure would have been an unsightly addition to the conservation area and was assessed as unacceptable by the applicant's development team. Antennas fixed directly to the side of the building was discounted on the basis that the maintenance of this equipment would have been problematic and likely would have required a crane with possible road closures during maintenance periods.

Alternative site options were considered by the applicant prior to the progression of site design for the equipment shown as part of this pre-application submission. This included Acquisition Surveyors and Radio Planners assessing several rooftops in the surrounding area for potential telecommunications equipment suitability. Alternative site options considered and rejected are provided in the below table. Where an approach is made to a site provider and no response is received that initial approach or any subsequent chasing, the site is considered not to be available and discounted from consideration on that basis.

Site	NGR (eastings/northings)	Reason for discounting
Rooftop – British transport Police HQ	529119, 184091	Security Issues associated with siting on rooftop.
Rooftop – 37 Camden Road	529135, 184132	Roofspace is entirely covered in PV solar panels, with no suitable space for telecommunications equipment.
Rooftop – Rixons Apartments	528928, 184187	Site is situated too far to the west from the required search area.
Rooftop – 140 - 160 Camden Street	529064, 184124	Northern half of the roofspace is unsuitable for telecommunications equipment. The southern half is too low in height for efficient propagation of signal due to the urban clutter to the east.
Rooftop – Lawfords Wharf	529249, 184059	Roofs of the Wharf are physically unsuitable and too low in height for efficient propagation.
Rooftop – Camden Road Station	529140, 184189	The Station building is listed and it would not be possible to install the required communications equipment without making significant changes to the fabric of this listed building.

Table presenting discounted alternative options

All other sites that were considered were rejected on the basis they were either too far from the area in need of coverage, that the rooftop could not structurally accommodate the proposed equipment or that the required height of antenna could not be achieved.

This letter therefore invites the Local Planning Authority, in accordance with planning policy guidance and Best Practice Commitments, to enter into pre-application discussions with regard to our preferred site option prior to a formal planning submission. Several steps in the site identification process have already been undertaken. The Local Planning Authority must register and our records of other potential sites have been reviewed, the policies in the Development Plan have been taken into account and we have examined the inter-operator site sharing database.

The proposal will be fully compliant with standards set down by the International Commission on Non-ionizing Radiation Protection (ICNIRP). ICNIRP is an independent scientific organisation whose aim is to provide guidance and advice on the health implications of telecommunications development. These

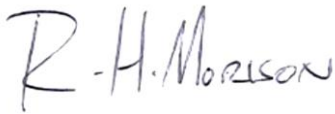
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guidelines have the support of the UK Government and European Union as well as the formal backing of the World Health Organisation.

I look forward to receiving any comments you may have and confirmation of how best to arrange payment of the pre application advice fee. We also look forward to the prospect of discussing a meeting with Council planners to discuss the design of the site. We would be grateful if you could advise us of any pending telecommunications applications or recent planning decisions in this particular area so these can be evaluated. Finally, we would be interested in any local stakeholders or groups that you consider would like to know more about our proposals.

In the meantime, if you require any additional information in respect of the above proposal, please do not hesitate to contact me either by the address on this letter, by email (below) or by telephone 01454 625 945. Finally, we would be interested in any local stakeholders or groups that you consider would like to know more about our proposals.

Yours sincerely

A handwritten signature in blue ink that reads "R. H. Morison". The signature is written in a cursive style with a large 'R' and 'M'.

Richard Morison
Principal Planner
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Tel: 01454 625945

(for and on behalf of Telefonica and Vodafone Ltd)