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The Chief Planning Officer
London Borough of Camden
Town Hall
Judd Street
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FAO: Jennifer Walsh

Dear Madam/Sir

PRE APPLICATION CONSULTATION FOR THE INSTALLATION OF A TELECOMMUNICATIONS SITE, COMPRISING OF THE INSTALLATION OF 12NO. ANTENNAS, 7NO. CABINETS, 2NO. 0.6 METRE DISH ANTENNAS, 2NO. 0.3 METRE DISH ANTENNAS AND ASSOCIATED DEVELOPMENT AT GRANGEMILL, 6-7 INGESTRE ROAD, CAMDEN, LONDON NW5 1XH (SITE REF 150303) NGR 528814 / 185803.

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

This proposal is for both Telefonica and Vodafone.

Cornerstone and Vodafone and Telefónica are in the process of progressing a suitable site in the Highgate Road area for a replacement radio base station. We aim to work with you to progress a replacement proposal that is both acceptable to your authority and meets Telefónica's and Vodafone's technical network requirements. This approach accords

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with Telefónica's and Vodafone's Best Practice Commitments to ensure consultation with Local Planning Authorities and other appropriate key stakeholders.

Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work. When a site is due to be decommissioned, the replacement site or sites must be located to fit in with the existing network in order to provide the replacement coverage.

This letter therefore invites the Local Planning Authority, in accordance with planning policy guidance and Best Practice Commitments, to enter into paid pre-application discussions with regard to our preferred site option prior to a formal planning submission.

The proposed site

- **GRANGEMILL, 6-7 INGESTRE ROAD, CAMDEN, LONDON NW5 1XH (SITE REF 150303) NGR 528814 / 185803.**
- The site is required to help fill the coverage loss following the decommissioning of the site at Linton House 39 – 51 Highgate Road, Kentish Town NW5 1RS to enable refurbishment and extension of the building. Replacement coverage is proposed to be provided at Grangemill in conjunction with the coverage currently provided by the temporary site at 379 Kentish Town Road, which is itself to be decommissioned by August 2020 following the loss of an enforcement appeal earlier this year.

Planning history

An application for prior approval was submitted to the council (reference 2018/6381) for the installation of 12no. pole mounted antennas (2 each on 6 poles), 6no. equipment cabinets, 4no. dish antennas at roof level, plus 1no. ground based meter cabinet and associated works.

The application was refused in January 2019 for the following reason: *"The antennas, by virtue of their location, design, height and number, would result in an excessive amount of visual clutter on a prominent rooftop which would harm the character and appearance of the building and surrounding estate. As such the proposed development fails to comply with Policy D1 of the Camden Local Plan 2017 and policy D3 of the Kentish Town Neighbourhood Plan 2016"*. Drawings submitted with the application are attached for reference.

The delegated report stated: *'It is acknowledged that there is a justified need for replacement antennas in this area and no other suitable buildings have been found. It is accepted that this tower is not prominent in the wider public realm, being within a private estate and bordering a railway line and another private estate. It is also considered that this block could be ideal as it is in the right place and of the right height to accommodate antennae and provide the necessary area of radio coverage. However insufficient thought and inventiveness has been applied to designing this proposal in such a way that could reduce the equipment's prominence. It is suggested that fewer antennas and poles of a lower height and significantly set back from the roof edge would be preferable which would reduce the overall impact on the tower. Alternatively perhaps, one tower mast, hosting all the required antennas to maintain a 360 degree coverage, could be placed centrally on the highest roof element of the block which would create a central visual design feature whilst maintaining the flat rooflines of the surrounding lower elements here.'*

To address this reason for refusal we have looked at **alternative designs**, taking into account the delegated report comments.

Reduced antenna height and numbers

We originally looked at reducing the antennas in height to 25.5 metres and reducing the number of antennas from twelve to six, keeping them on the edge of the building. This option was sent for comment to the planning officer who dealt with application 2018/6381. No response was received.

However due to the technical requirement for both operators, confirmation has since been received that the number of antennas cannot be reduced. Twelve antennas are needed here to provide 2G, 3G and 4G coverage for both operators, thus a reduction in antenna numbers as suggested in the delegated report is not possible. Additionally the designers later advised this lower antenna height scheme is not ICNIRP compliant because some of the antennas would be shooting into residential windows/floors in the building and on the lower rooftop. This design is therefore no longer an option. Drawings for this now rejected design are attached for information.

Moving antennas back from edge of roof

Due to the restrictions resulting from ICNIRP, the drawings submitted with the application are the minimum height for compliance on the main roof of the building. Our designers have confirmed moving the antennas back and keeping the same height, as suggested in the delegated report, will not comply with ICNIRP. This is because some of the antennas will send a signal into the residential floor below and/or lower rooftop. For example, the western facing antennas would clip the lower roof and be unable to provide full replacement coverage, and the south west facing antennas would shoot into the floor below in that direction, contravening ICNIRP guidelines.

Face mounted antennas on plant room

Face mounting antennas on the plant room was investigated. Antennas could not be face mounted on the plantroom as this would not be ICNIRP compliant – people would not be able to walk in front of the antennas - and would not ensure the edges of the building did not clip the signal. The height of the antennas in the preferred design (see below) is the minimum height needed to place the antennas on the plant room and ensure both coverage and ICNIRP compliance.

Single mast on plant room

Our designers have advised that for a single lattice mast on the plant room to enable coverage and ensure ICNIRP compliance, a height of c. 34m would be required. Please note this is provided for information only; no investigation into the structural soundness of the plant room to accommodate a lattice mast has been undertaken. Given this, and the height differential between a lattice mast (c.34m) and pole mounting antennas on the plant room (31.5m), the latter is the preferred option.

Preferred design

Our preferred design is therefore to position the antennas on the roof of the plant room. This will ensure that the site can provide the required replacement coverage, with the antennas set as far as possible from the main edge of the building as suggested in the delegated report. This will also ensure ICNIRP compliance such that access to the main

roof will not be restricted. The proposed cabinets have been relocated to the plant room roof, to reduce feeder lengths and to reduce the amount of space taken up.

Alternative sites

In terms of alternative sites, the search area concentrated on the area around Linton House which is a mix of retail/ commercial and residential. As set out above, the delegated report acknowledged the lack of suitable sites to provide replacement coverage, and the site itself was considered acceptable, with the design needing work/justification. As a result, alternative site information is not provided here.

Need for the site

The delegated report also acknowledged the need for this replacement site, so coverage plots are not submitted with this pre-application query; they will be included in any subsequent application.

ICNIRP

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.

Our request to you

We look forward to meeting with you to discuss the above.

As a response to our pre-application enquiry we would like to receive:

- Appropriate planning constraints including any restricting permitted development rights
- Relevant telecommunications history or applications pending in the surrounding area
- Community interest groups and other stakeholders you consider may like to know more about our proposals. We are aware the Kentish Town Forum specifically did not raise an objection to application 2018/6381
- Comments on the proposed design, its acceptability and what can be done to make it acceptable given you have confirmed the location is acceptable.
- Details of additional information such as photomontages to assist with justification and assessment of proposal at application stage.

We look forward to receiving your acknowledgement and confirmation of a meeting date as soon as possible. It is noted this pre-application advice request is being dealt with in tandem, under the same fee, as the pre-application advice request for Monmouth House.

Yours faithfully

R. N. Skerrett

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(for and on behalf of Cornerstone and Telefónica UK Ltd and Vodafone Limited.)