SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Spaniards Way	Site Address:	Spaniards Road, Hampstead Heath, Camden, London, NW3 7ET
NGR:	E: 526393 N: 186679		
Site Ref Number:	98336	Site Type:	Macro Street Works

2. Pre-Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why: After a phone call to the LPA it was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Pre-application consultation with LPA

Written offer of pre-application consultation:	Yes	
Was there pre-application contact:		No
Date of pre-application contact:	N/A	
Name of contact:	The Director of Planning	
Summary of outcome/Main issues raised: No comments have been received in respect to the proposal.		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:		Amber	
Prior to the submission of this application the applicant initiate pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues. Further consultation has also been carried out with the Ward Councillors (Cllr Maria Higson, Stephen Stark and Oliver Cooper).			

Summary of outcome/Main issues raised: The response below was submitted by the Local Ward Councillor: *Dear Suzi,* *Thanks for this. I have no criticism of 5G and am always happy to correct people that spread fake news about it. But this proposal really does not help us do that.* *The added bulk is really quite difficult to say does not have an impact on the community. It may appear to be on the side of the road in the middle of nowhere, but it's actually on the side of London's most valuable wild space, with this now domineering over the trees that had otherwise hidden from view the previous antenna.* *The significant addition to the street furniture is a concern, but secondary to the added elevation, which would both reduce the amenity for users of Hampstead Heath and provide a very visible cause celebre that helps delegitimise 5G.* *As such, is there no way for this to be lower than this gargantuan height?* *Kind regards,* *Oliver* *Cllr Oliver Cooper*

School/College

Location of site in relation to school/college: There are no schools in close proximity that overlook the site.
Outline of consultation carried out with school/college: N/A
Summary of outcome/Main issues raised: N/A

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?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?		Yes	
Date served:	27th June 2020		

3. Proposed Development

The proposed site:
At present MBNL are embarking upon a process to upgrade their existing streetworks monopole installations to make them 5G. These sites are predominantly located on Highways land close to population densities and have been sited with consideration of a sequential approach to site acquisition. With 5G the design of the installations has to change. MBNL are now deploying 2G/3G/4G and 5G antennas in order to provide the best possible mobile experience for all our customers. The proposed new mast has been sited and designed in order to provide 5G coverage and to support the existing mobile network. At present it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centres and places of work to residential areas and suburbs requires an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides such additional capacity to the network whilst still promoting the improved 5G technology. The proposed development is within the limits set out in Part 16 for permitted development with Prior Approval. The location enables the whole of the surrounding area to benefit from improved 5G network coverage and has been designed to be future proof, thus enabling other technologies to be deployed depending upon the demand required. As the shift in demand is expected for the foreseeable future and that as central government considers digital communications to be a critical national infrastructure, we intend to support customers and local residents by ensuring as little disruption as possible. The existing site will therefore be retained at this time so that all existing users may benefit at this difficult time. In addition, EE will become the Emergency Services Network Provider and in order to dedicate the 4G network for that use, the intention is to support all users during the current climate and to maintain all current services without the removal of any existing equipment. While we appreciate that your council may have ongoing difficulties in progressing applications due to the current restrictions, we would urge you to try and progress this application as a 'Priority Submission' within the 56 day time-frame due to its critical national importance at this time. The proposed location at Spaniards Road, Hampstead Heath, Camden, London, NW3 7ET is an established telecommunication site. This submission is purely to upgrade this existing cell with new equipment to facilitate 5G coverage. The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. H3G and EE have a network sharing agreement and thus these installations are fully compliant with the NPPF. The existing site can be seen below in Figure 1, the site is located off Spaniards Road surrounded by tall existing street furniture (street lights) with mature trees to the rear. The nearest residential property is located beyond the surrounding thick mature tree line and thus is

not directly overlooking it.

Figure 1:

There are no other viable alternative options other than to upgrade the current cell. Discounted options were put forward and assessed at the original planning application stage and this was deemed to be the most appropriate location. Given the height that is required for this site sharing 5G upgrade there is a lack of available rooftops.

The area is rural / greenspace in nature, and this is the only potential location that is set away from properties in what is a constrained cell search. Long distance views will benefit from partial screening from the existing street furniture and trees. Only oblique views form residential properties will be apparent. Please note any Highways issues with the number of cabinets and maintaining visibility splays at the junction and maintaining footpath widths has been robustly assessed.

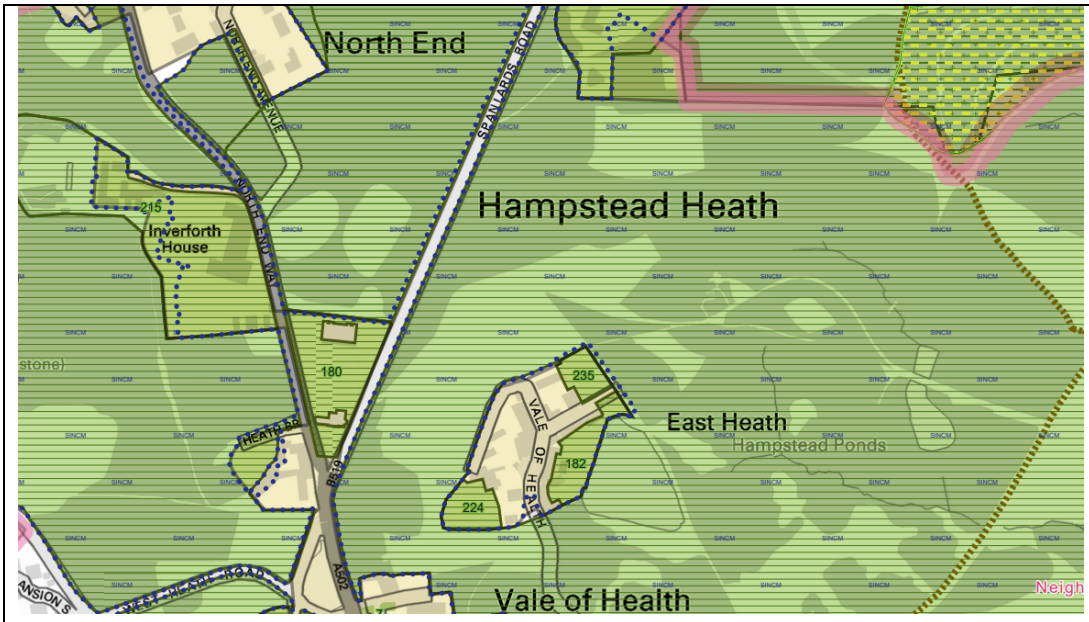
In keeping with the National Planning Policy Framework (NPPF). guidelines of using: “high quality communications infrastructure”, the proposed street works monopoles design have been selected to minimise visual impact upon the street scene by integrating with the existing street furniture, having similar vertical lines and overall appearance to the street lighting columns that are common feature in the built environment.

Site Ref	98336	Site Address	Spaniards Road, Hampstead Heath, Camden, NW3 7ET

Local Planning Authority: London Borough of Camden

Development Plan: Camden Local Plan (2017)

Figure 2 – CA Map Extract (reference only)



The site is located within the Open Space area of Hampstead Heath, this location alongside the existing highway is sought to reduce the impact on any residential properties within the surrounding area. It is not thought that the designation of the land will not be a material consideration with regards to this proposal.

Policy Relevant to the Development Site:

The London Borough of Camden does not have a specific telecoms policy. Therefore the NPPF is of relevance. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with the NPPF.

The proposed works on this site would are suitably distant and diminutive in scale and design (when seen in context) as to not be to the detriment of the surrounding area or its character (the visual change would be limited) as well as respecting the integrity of the building, and yet would provide the requisite coverage needed in the area as well as facilitate site sharing, so according with the principles of the policy, so ensuring any less than substantial harm is outweighed by demonstrable public benefit.

It accords with the requirements of the NPPF and the objectives of the London Plan (Policy 4.11 Encouraging a Connected Economy (March 2015))

The presence of the existing column sets a clear precedent for telecommunications development in this location and indicates that the principle of this proposal is acceptable in terms of siting. As stated above the National Planning Policy Framework advocates site sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.

Enclose map showing the cell centre and adjoining cells:
This can be emailed to the LPA on request.

Type of Structure
Description: TOP OF PROPOSED H3G ANTENNAS +15.00m AGL (+147.00m AMSL) C/L OF PROPOSED H3G ANTENNAS +14.60m AGL (+146.60m AMSL) U/S OF PROPOSED H3G ANTENNAS +14.20m AGL (+146.20m AMSL) TOP OF PROPOSED EE/H3G ANTENNAS +13.75m AGL (+145.75m AMSL) C/L OF PROPOSED EE/H3G ANTENNAS +12.75m AGL (+144.75m AMSL) U/S OF PROPOSED EE/H3G ANTENNAS +11.75m AGL (+143.75m AMSL) PROPOSED EE/H3G WRAP-AROUND CABINET BUILT AROUND BASE OF PROPOSED STREET POLE TOP OF PROPOSED EE/H3G STREET POLE +15.00m AGL (+147.00m AMSL) PROPOSED 15.0m HIGH EE/H3G PHASE 8 STREETWORKS POLE ON NEW ROOT FOUNDATION PROPOSED H3G BATSMAN CABINET TO BE INSTALLED ON NEW CONCRETE BASE PROPOSED H3G BOWLER CABINET TO BE INSTALLED ON NEW CONCRETE BASE PROPOSED H3G APM5930 CABINET TO BE INSTALLED ON NEW CONCRETE BASE Description: It is imperative to consider from a planning perspective that this is purely an upgrade to the existing cell – An existing structure already exists a second pole will be added. The location is an established telecoms location

Overall Height: 15.00m AGL	
Height of existing building	N/A
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc – type of material and external colour:	See drawings
Equipment housing – type of material and external colour:	See drawings

Reasons for choice of design:
In keeping with the National Planning Policy Framework (NPPF). guidelines of using “high quality communications infrastructure”, the proposed design has been selected to minimise visual impact upon the street scene.

4. Technical Information

ICNIRP Declaration attached ICNIRP public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or	Yes	

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 the site are taken into account.		

5. Technical Justification

Reason(s) why site required
The National Planning Policy Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network. The site is required to provide enhanced coverage for EE Ltd, ESN and H3G LTE.

6. Site Selection Process – alternative sites considered and not chosen

Discounted Options
In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) following search criteria have been utilised. Firstly, consideration is always given to sharing any existing telecommunication structures in the area, secondly consideration is then given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground based installations are investigated. This sequential approach is outlined below: a) Mast and Site Sharing b) Existing Buildings Structures c) Ground Bases Installations In compliance with its licence and the sequential approach outlined in the NPPF all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Ofcom Site Finder mast register is always examined prior to the submission of an application.

If no alternative site options have been investigated, please explain why:
The current siting was agreed by the LPA as the most appropriate location when the original installation was approved by the Council. Discounted options were supplied with the original planning submission and thus the principle of the siting is already established.

7. Additional Relevant Information

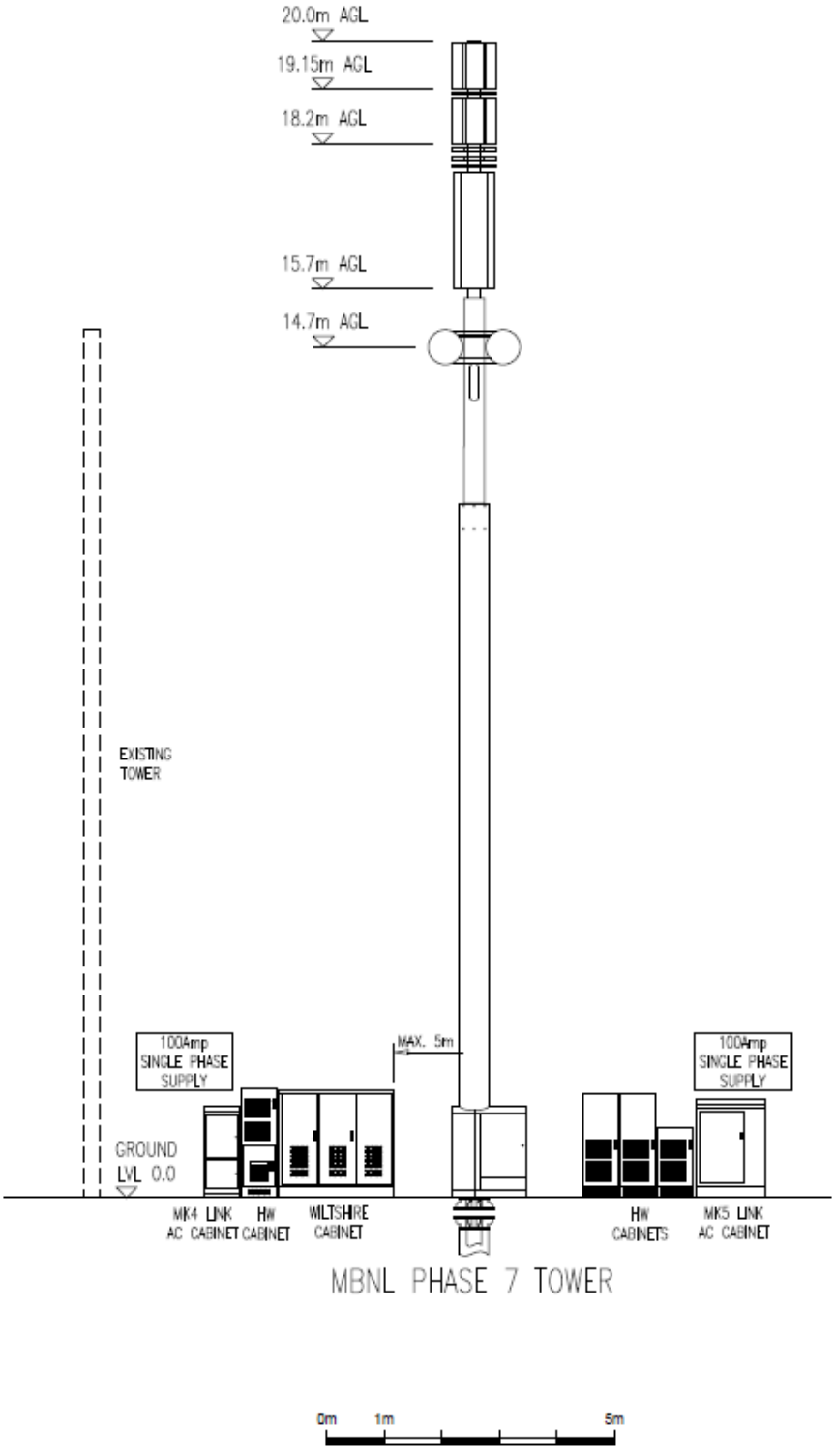
Background to the Proposal

5G operates across multiple spectrums and therefore requires additional antennas and new equipment cabinets. The signals that are broadcast are more prone to the shadowing effect of adjacent buildings or structures, and the effect of tree canopies reducing the broadcast range and effectiveness of the antennas. Consequently, the height of the 5G antennas needs to be sited to avoid such obstacles and this in part dictates the height of the new Streetworks monopoles. All new proposals will be set out in associated drawings and the broadcast levels will also be within agreed ICNIRP (International Commission for Non-Ionising Radiation Protection) guidelines.

The higher frequencies that 5G will use can provide more bandwidth and thus greater capacity but the signal will not travel as far as those of previous generations. The implications to the built environment will be that more infrastructure is needed with a significant increase in capital required. In order to meet future demands for connectivity the new installations will have to be designed to optimise the network and thus provide a public benefit in addition to the existing telecoms generations and frequencies used. Additional installations are anticipated in high demand areas such as city centres and residential housing estates in order to meet the ever-increasing levels of demand and capacity.

Note typical design and size of proposed Streetworks monopoles in Figure A

Figure A:



In order for the UK to benefit from the huge potential of 5G Local Planning Authorities will have to weigh the Public Benefits of such connectivity with the requirements to direct and manage the built environment. Central Government understands that this may present concerns with the various design solutions proposed but it is important that all Local Planning Authorities understand the technical needs of 5G and better understand the wider advantages of such

new technology. This is further emphasised within the National Infrastructure Commission's report in 2016, where National Digital Strategy will be directed through the Economy and Industrial Strategy Cabinet Committee in order to:

"Support and challenge local government in their plans to enable the delivery of digital infrastructure; both in terms of ensuring that these plans help the UK to meet its national objectives, and that local authorities develop consistent approaches to support the deployment of mobile infrastructure across the country".

'Connected Future', National Infrastructure Commission 2016

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However, if this overlap is too great unacceptable interference is created between the two cells.

DEVELOPMENT PLAN POLICY.

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, it is stated that:

"Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise."

NATIONAL PLANNING POLICY

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF July 2018) sets out the Government's planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people and their accountable Councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including;

- Economic Role – contributing to building strong, responsive and competitive economy;
- Social Role – Supporting strong vibrant and healthy communities; and
- Environmental Role – Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs

through both plan-making and decision-making processes. The NPPF recognises the vital importance of high quality telecommunications and dedicates a whole chapter to this. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraphs below clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

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. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution)."

It continues in Paragraph 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." Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded this will always adhered to before a new proposal is put forward for consideration.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 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."

Conclusion

We consider that the development is complaint with the council's policy and that in accordance with Section 38 (6) of the Planning and Compensation Act 2004 permission should be granted for the installation.

We consider the development complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

On the basis of a recognised need to expand and promote telecommunications networks

across the region, it is considered that the proposal fully accords with the requirements of the National Planning Policy Framework and Local Plan Policies.

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Signed:		Date:	28th June 2020
Position:	Planning Manager	Company: (on behalf of above operator)	WHP