

Our ref: ArqivaSS/206874/ Swains Lane

Date: 29th July 2020

The Chief Planning Officer
London Borough of Camden
Planning Department
2nd Floor
5 Pancras Square
London
N1C 4AG

Dear Sir/Madam

Submission of an Application for a Prior Approval Determination

Proposed Alterations to Existing Base Station installations at Swains Lane Transmitting Station, Bisham Gardens, Off Swains Lane, Highgate, Camden, Greater London, N6 6PH.

On behalf of Cornerstone Telecommunications Infrastructure Ltd (CTIL) and Vodafone Ltd, we submit herewith an application for a prior approval determination for the installation of electronic communications apparatus at the above site. This application follows the completion of our pre-application consultation exercise, reflecting so far as is practicable the guidance and comments offered.

The application is submitted in accordance with the requirements of Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, and seeks a determination as to whether the Authority's approval will be required for the siting and appearance of the development.

The application comprises:

- The written description of the development comprising;
 - The following works at ground level within the existing compound these being the deployment of 1 x CSC cabinet, new cable tray on existing concrete foundation, refreshment works within existing RBS equipment cabin, new cable ladder for fibre cables 1 x GPS antenna at 3m installed on extended gantry pole off existing.
 - Works on the tower are to include the following, the removal of 2 x Kathrein 80010665v01 antenna at 15.5m and the removal of 1 x Jaybeam 5260311 at 15.5m. These are to be replaced by the installation of 3 x Commscope EGYHHTT-65B-R6 antenna at 15.5m on a new proposed support face frame on the tower.

- Additional works will include new fibre and DC cables, 3 x 800 ERS Units and 3 x OD BoB's and 3 x 2600 ERS Units on proposed support poles on the new face frame.
- An O.S. location plan scale (1:1250); - 141634-00-004-ML002
- Electronic payment of £462 in respect of the statutory application fee;
- The Developer's Notice served on the landowner
- The Developer's contact details
- Proposed site plan - 141634-22-100-MD040, equipment plan - 141634-22-101-MD040 and proposed elevation - 141634-22-150-MD040
- A certificate of ICNIRP compliance
- The Benefits of Mobile Connectivity

The Proposed Development

The operator already provides coverage from the existing base station at this site, but has a requirement to install the electronic communications apparatus referred to in this letter and shown in the submitted drawings. As a consequence, this particular technical requirement is not one that can be met on an alternative site.

The amount of development, its design and the location of the apparatus at this existing electronic communications site has been guided by the technical and operational requirements of the operator's system having proper regard to minimise appearance. The electronic communications apparatus proposed should not materially affect the overall appearance of the existing site to any noticeable or adverse degree from any public vantage points than would already be the case.

The site is located within the Highgate Village Camden Conservation Area. The development would result in the slight upgrading of an existing facility. The new antenna would be a like for like replacement in terms of location on the existing tower, with the new ground level cabinet within the existing compound which is screened from most surrounding public viewpoints by a brick wall between 2-3m in height. Due to its limited scale, it is not considered that the proposal would have any resulting significant adverse impact in respect of the character, appearance or setting of the Conservation Area as a heritage asset.

The apparatus proposed will not bring about any additional requirements with regard to access. Access to this operational site will, therefore, remain the same as the current arrangements as shown on the location plan.

In accordance with all relevant health and safety regulations and guidelines, access to the site is restricted to authorised personnel and access for maintaining or servicing all the apparatus can only be carried out by properly trained and qualified staff. Such routine operations will continue to be carried out roughly once a quarter, with no requirement to increase this arising out of the development proposed. The application does not therefore give rise to any public issues associated with access. The relevant ICNIRP Declaration is submitted with the application confirming the design's conformity with the relevant guidelines.

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. In terms of Development Plan policies, the Croydon Local Plan (2017) does not contain any policies that specifically relate to telecommunications proposals. In this case, due to the lack of telecommunications policy at local level, the NPPF would be the starting point in assessing the proposal.

As the apparatus proposed will lead to improvements to a public service provided in the local area, the application merits support and accords in all respects with national and local planning policy, especially Section 10 of the National Planning Policy Framework as it would result in the upgrading of an existing site. Furthermore, this would in turn ensure that there would be no significant harm caused to the heritage asset and would therefore be consistent with Section 16 of the Framework. Additionally, the proposal would also be in keeping with the aims of Policy D2 Heritage of the Camden Local Plan.

In accordance with the proposal's Green TLR and minor scale of development, consultation was only undertaken with London Borough of Camden (Ref: ArqivaSS/206874/ Swains Lane) in this instance on 14th July 2020. No response has been received to date for the consultation letter sent.

Notification under the Electronic Communications Code Regulations

This letter and the enclosures also provides due notification under Regulation 5 of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended. In particular, you are given notice of the intention to install the electronic communications apparatus described in more detail in the application documentation (including the scale drawings) and to be located as shown on the application plans. No fee is required for this separate statutory notification.

Developer's Contact Details

All correspondence and queries relating the determination of this application should be submitted to the undersigned.

Harlequin Group Ltd
Rutland House
5 Allen Road
Livingston
West Lothian
EH54 6TQ
T: +44(0)1506 462174
www.harlequin-group.com



However, in accordance with the requirements of The Town and Country Planning (General Permitted Development) (England) Order 2015, as amended any correspondence to the developers should be sent to:

CTIL Limited, Building 1330, Arlington Business Park, Theale RG7 4SA

Email – emf.enquiries@ctil.co.uk

The following company addresses are also supplied for information:

CTIL, The Connection Newbury, Berkshire, RG14 2FN

Vodafone Ltd, Vodafone House, The Connection Newbury, Berkshire, RG14 2FN

Telefónica UK Ltd, 260 Bath Road, Slough, Berkshire, SL1 4DX

We would be willing to meet with you or assist with any visits to the site and the surrounding area, if this is deemed as being beneficial to the determination of the application.

Finally, your attention is drawn to the statutory 56 day period for the determination of this application in accordance with the conditions set out in Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). Further guidance is provided on this as set out in paragraphs 8.4-8.8 of the Code of Best Practice on Mobile Network Development in England, June 2016.

Should you have any queries or require any further assistance in relation to the determination of this application then please do not hesitate to contact me direct either by email or my direct dial or mobile number as below.

Yours faithfully

A handwritten signature in black ink, appearing to read "Martin Brown".

Martin Brown
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On behalf of Arqiva Ltd