



Design, Access and Supporting Statement
in respect of Full Planning Application
On behalf of New Line Networks LLC

at

Bacton Tower
Haverstock Road
Lismore Circus
London, NW5 4PX



Submitted By : Helen Bolam

1.0 Proposed Development

1.1 Site Search Process

This supporting statement aims to assist the Local Planning Authority in the evaluation of the scheme currently proposed and aims to identify the reasoning behind the siting, design and appearance of the development.

In accordance with the advice in National Planning Policy Framework and the ODPM Code of Best Practice, New Line Networks LLC (“NLN”) site selection strategy is to keep the overall environmental impact to a minimum and to reduce the proliferation of telecommunications sites where possible. The use of existing buildings, the sharing of masts or the upgrade and improvement of existing installations is always preferred where it is technically and legally possible, and where it is the local authority’s preferred environmental solution.

There is already existing telecommunications equipment on the rooftop of Bacton Tower, as O2 have an installation in situ, reference 335.

The dish sizes currently proposed are determined by the length of the link and the strength of the signal received or transmitted and are the smallest possible in order to ensure that the data signal transmitted is to the quality required for the efficient operation of the network. Siting has been carefully considered, alternate options were investigated and were either found to be unsuitable because line of sight could not be achieved or unsuitable due to site provider’s reluctance to host the equipment. Siting and design on this particular site was carefully considered to create the links, yet to minimise the impact of the installation on surrounding buildings and views.

1.2 The Site

The application development is located on an existing structure, being Bacton Tower, Haverstock Road, Lismore Circus, London, NW5 4PX. The building, which is a residential tower block is not located within any specific designations or a listed building. The National Grid Reference for the site is **528078/185331**

The area surrounding the property is in mainly residential use with a number of blocks of flats in the vicinity. The proposal is to install Four (4) no. additional microwave transmission dishes on poles fixed to the inside of the parapet walls, one (1) no. new 150mm wide cable tray and one (1) no. new equipment cabinet fixed to the inside of the parapet wall on a cantilever bracket. The main roof level is 65.70m with the proposed dishes being at 66.40m and 67.60m.

In the siting and location of this proposal, NLN have had regard to:-

Local development plan policy;
Government guidance in the form of National Planning Policy Frameworks;

1.3 Design Component

Due consideration has been given with regard to technical, engineering, environmental and land use planning within the design of the proposed telecommunications installation.

The principal components of the proposed development are outlined on the Supplementary Information Template, and the general layout illustrated on the attached site layout plan and elevations.

The bearings of the dishes reflect the direction of the microwave transmission links.

The proposed equipment is as follows:

Dish 1 - 0.9m Transmission Dish – Bearing approximately 85 Degrees – This dish will be located on a new steel pole on rooftop at a height of 66.40m which will be barely visible if at all on the skyline due to the height and proximity of nearby buildings, and it will also not be seen from many, if any viewpoints at ground level. It should be noted that the dish is “firing” to provide a link to a lower level building nearby, so the exact position is important.

Dish 2 - 0.9m Transmission Dish – Bearing approximately 85 Degrees – This dish will be located on a new steel pole on rooftop at a height of 66.40m which will be barely visible if at all on the skyline due to the height and proximity of nearby buildings, and it will also not be seen from many, if any viewpoints at ground level. It should be noted that the dish is “firing” to provide a link to a lower level building nearby, so the exact position is important.

Dish 3 - 0.6m Transmission Dish – Bearing approximately 264 Degrees – This dish will be located on a new steel pole on rooftop at a height of 67.60m which will be barely visible if at all on the skyline due to the height and proximity of nearby buildings, and it will also not be seen from many, if any viewpoints at ground level. It should be noted that the dish is “firing” to provide a link to a lower level building nearby, so the exact position is important.

Dish 4 - 0.6m Transmission Dish – Bearing approximately 264 Degrees – This dish will be located on a new steel pole on rooftop at a height of 67.60m which will be barely visible if at all on the skyline due to the height and proximity of nearby buildings, and it will also not be seen from many, if any viewpoints at ground level. It should be noted that the dish is “firing” to provide a link to a lower level building nearby, so the exact position is important.

Equipment Cabinet – The equipment cabinet will be located on a cantilever bracket affixed to the wall adjacent and below two of the proposed dishes. This will be situated at the lower roof height of 61.9m and will not be visible on the skyline as it will be seen in the context of the existing rooftop equipment.

1.4 Access

Maintenance and build access for the installation will be as per existing arrangements for the building. Given that the proposed telecommunications dishes will be sited on the rooftop, the site will only be accessed by those personnel associated with the applicant. Access to the proposed site is set well away from recognised public rights of way and is remote from pedestrian and vehicular movements within the public realm.

There is no public access to the site for security and safety reasons.

1.5 Landscaping

It is considered that a scheme of soft or hard landscaping would be inappropriate in this case, as the proposal relates to the installation of electronic communications apparatus located on the roof of a building to which there is no right of public access.

2.0 Pre-application Consultation

Given that the proposal is to install equipment on an existing structure which accommodates a number of items of telecommunications equipment already, it has been rated as **Green** for consultation purposes and, as a result, consultation has not been carried out.

Local Planning Authority

As this application is for works to an existing site and is limited in nature, it was considered unnecessary to carry out pre application consultation in this instance. It is not considered that there will be any major visible impact to the surrounding community as the proposal will be located on a tall building in excess of 30m.

Local Stakeholder Consultation

The site is an existing rooftop with an established telecoms use. As NLN are only installing limited equipment additions, this proposal has been rated as **Green** for consultation purposes and as such it has been decided that additional consultation will not be required in this case.

3.0 Civil Aviation Authority/Secretary of State for the Defence/Aerodrome Operator

For this particular application the Civil Aviation Authority, the Secretary of State for the Defence and the aerodrome operator have not been informed of our proposal. No change to the height of the existing building is proposed, and the site is not within proximity of an airfield.

4.0 National Planning Policies

The Government published the National Planning Policy Framework (NPPF) in July 2021 and supersedes previous versions of the document and national planning guidance contained in the various Planning Policy Guidance notes and Planning Policy Statements. The document sets out the Government's economic, environmental and social planning policies for England and how these are expected to be applied in relation to all planning applications.

From a telecommunication perspective core principle 10 of the NPPF, entitled 'Supporting High Quality Communications' sets out the government's aims with regards telecommunications. The framework states that the development of high-quality communications networks is fundamental to securing both economic and social wealth and well-being.

"Section 10 - Supporting High Quality Communications

114. 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 high quality 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 case, provide the optimum solution).

115. 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."

NLN is seeking to develop its network through the installation of base stations at existing telecommunications sites and on tall buildings in urban areas. This approach is entirely consistent with the telecommunications development national planning policy as set out in the National Planning Policy Framework. The application site was chosen as it is a tall building in the area,

therefore being able to provide the “line of sight” technical requirement that will assist in minimising the visual impact of the development while meeting the overriding technical and operational coverage requirements of the proposal.

“116. Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. They should ensure that:

- *they have evidence to demonstrate that telecommunications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and”*

The proposed dishes will not cause any significant and irremediable interference.

- *they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and telecommunications services.”*

The proposal does not seek to construct a new mast or building. The building will remain generally as existing, with the proposal only causing a minimal change to its exterior appearance.

“117. Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- a) The outcome of consultations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and*
- b) For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or*
- c) For a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.”*

An ICNIRP certificate is supplied with this application confirming that the proposal will meet with the relevant guidelines.

“118. Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or set health safeguards different from the International Commission guidelines for public exposure.”

It is considered that the application for the site is in accordance with the specific National Policies.

5.0 Conformity to Local Planning Policies

Local and Regional Plan Policy

In terms of Local Plan Policies, by virtue of Section 70 of the Town & Country Planning Act 1990 [further enshrined in section 38(6) and the Planning and Compulsory Purchase Act 2004], development should be in accordance with development plan policies, unless material considerations indicate otherwise.

Local Plan Policy is enshrined within the Camden Local Plan 2016-2031 (adopted July 2017). In relation to telecommunications development, this document does not contain any discernible policy, although Camden Council have adopted a number of Camden Planning Guidance (CPG) documents in January 2021, one of which pertains to telecommunications infrastructure – Digital

Infrastructure March 2018. In this document, the Council underlines its requirement for applications to conform with the previously stated policies of the NPPF.

Health & Safety

We would remind the Council that the Government has set out its clear view on the issue of health and perceived view of health risks in paragraph 118 of the NPPF:

“Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure.”

As above, and included within this application, New Line Networks have confirmed this installation will be fully ICNIRP compliant.

THE LONDON PLAN, 2021

The London Plan sets out the Mayor’s planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In Paragraphs 1.5.1-1.5.6 ‘*Growing a good economy*’, the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to secure its long-term growth.

It is considered that telecommunications networks are an integral element in securing the Mayor’s vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in Policy SI 6 ‘*Digital Connectivity Infrastructure*’ of the Plan. Policy SI 6, and its written justification, is clearly supportive of the role of improved network connections in the area.

The aim of the Infrastructure Plan is to enable for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan indicates how the London Mayor’s Office shall support an economically viable mix of technologies including fibre broadband, mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. This document is supported by the report Raising London’s High-Speed Connectivity to World Class Level. As detailed within these Digital Connectivity is now considered the fourth utility. Internet access not only affects the productivity of businesses and proves essential to the future growth of many firms, it is also vital for many residents to take part in modern society (as more services move online).

The Mayor’s Office shall work with central government and London’s local authorities to ensure that strategic communication networks are enabled rather than inhibited by the planning and other regulatory systems (whilst ensuring the utility works themselves are properly managed).

New Line Network’s networks are integral in securing the Mayor’s vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

6.0 Alternative options considered

In this instance, there are very few options that would meet NLN’s Technical requirement as they need to link different buildings with the installation and also the proposal needs to be located within close proximity to the existing site.

Other buildings in the area were also considered, but none could offer the building height that Bacton Tower could.

7.0 Health and Safety

Telecommunications planning guidance states that it is not for the local planning authority to seek to replicate, through the planning system, controls under the health and safety regime as it is a matter for the Health and Safety Executive.

The Government guidelines state that provided a proposed installation meets the ICNIRP guidelines for public exposure, then it should not be necessary for the local planning authority to consider the impacts of health concerns.

In this case the equipment is safe by design given that the microwave transmission link works on point-to-point pencil beam in forward direction only. No radiation is given off away from the pencil beam. Considering this it is confirmed that the proposed equipment and installation complies with ICNIRP guidelines and a Certificate of Compliance has been submitted in support of the application. It is noted that the installation will not affect any of the existing telecommunications infrastructure in terms of health and safety.

8.0 Technical Justification

This application relates to the installation of Microwave Telecommunications dishes and not satellite dishes which are significantly larger in surface area.

Microwave Telecommunications dishes are generally used for point-to-point Telecommunications services and hence must have a clear line of sight to the point they transmit to and receive signals from. To enable this unhindered line of sight to be obtained requires precise positioning of equipment at a height to enable the link to clear any obstructions. Line of sight surveys have been completed from the proposed locations on the subject building.

9.0 Conclusion

The proposed development is to facilitate strong transmission links between a number of London Buildings. To enable this link a series of sites must be established with clear line of sight between each one. This requires sufficient height and also to be in a specific location in order for the links to be facilitated.

Aviation air space must also be avoided. In searching for available sites national and local planning policy guidance leads towards the use of existing established telecommunications sites. The site is one of few existing telecommunications sites which provide both the desired location and the height of structure to facilitate links.

National and local planning policy clearly sets out that any development which seeks to improve the telecommunications infrastructure, promotes site-sharing, minimises visual impact and keeps telecommunications sites to a minimum should be supported in principle. Accordingly, the proposed development is considered to conform to national and local planning policies and should be supported.