CTIL

Our ref: CTIL 145173

The Chief Planning Officer
London Borough of Harrow
Civic Centre
Station Road
Harrow
HA1 2XY

29th October 2014

Dear Sir/Madam

CLARIFICATION OF THE DECLARATION OF ICNIRP COMPLIANCE ISSUED AS PART OF THE PLANNING APPLICATION ATTACHED FOR SITE CTIL - 145173, TEF - 16124 AT AYLMER ROAD SF, HIGHGATE, LONDON, N2 0PL (NGR: 527538, 188620).

I refer to the Declaration of Conformity with ICNIRP Public Exposure Guidelines ("ICNIRP Declaration"), sent with this application in relation to the proposed telecommunications installation as detailed above.

The "ICNIRP Declaration" certifies that the site is designed to be in full compliance with the requirements of the radio frequency (RF) guidelines of the International Commission on Non-Ionizing Radiation (ICNIRP) for public exposure as expressed in the EU Council recommendation of July 1999.

This ICNIRP declaration takes into account the cumulative effect of the emissions from the proposed installation and all radio base stations present at, or near, the proposed location.

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The radio emission compliance calculation is based upon the maximum possible cumulative values.

All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.

The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

If you have any further enquiries concerning the "ICNIRP Declaration" certificate or anything else in this letter then please contact the CTIL EMF UNIT on 01753 564306.

Yours faithfully

MARCUS FIDDES
ACQUISITION AND DESIGN MANAGER

CTIL

Our ref: *CTIL-15173*

Declaration of Conformity with ICNIRP Public Exposure Guidelines
("ICNIRP Declaration")

Telefónica UK Limited
260 Bath Road
Slough
Berkshire
SL1 4DX

Declares that the proposed equipment and installation as detailed in the attached GPDO application at;

Highways verge adjacent to Aylmer Road
Highgate
London
N2 0PL

NGR: 527538, 188620

is designed to be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionizing Radiation (ICNIRP), as expressed in the EU Council recommendation of 12 July 1999 * "on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz)".

* Reference: 1999/519/E

Date:	*29/10/14*
Signed:	
Name:	Marcus Fiddes
Position:	Acquisition and Design Manager

waldon

Waldon Telecom Ltd
Phoenix House
Pyrford Road
West Byfleet
Surrey
KT14 6RA

Telephone
01932 411011

Fax
01932 411012

E-mail
enq@waldontelecom.com

Website
www.waldontelecom.com

Our ref: JL/CTIL/145173 **(please quote on all correspondence)**

Haringey Council
Place & Sustainability
Planning, Regeneration & Economy
30 OCT 2014
Received
6th Floor River Park House
225 High Road N22 8HQ

The Chief Planning Officer
London Borough of Haringey
Planning Service, Level 6
River Park House
225 High Road
Wood Green
N22 8HQ

BY RECORDED DELIVERY

29th October 2014

AS 1075253
£385 CHQ

Dear Sir / Madam,

PROPOSED UPGRADE OF EXISTING BASE STATION ON LAND ADJACENT TO AYLMER ROAD, HIGHGATE, LONDON, N2 0PL. (NGR: 527538, 188620)

This application is submitted under Part 24 of Schedule 2 to the Town And Country Planning (General Permitted Development) Order 1995, as amended by the Town And Country Planning (General Permitted Development) (Amendment) (England) Order 2001, The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013 and the Town and Country Planning (General Permitted Development) (Amendment) (No.2) (England) Order 2013 and in accordance with the electronic communications code under the Telecommunications Act 1984 Schedule 2 as amended by the Communications Act 2003.

This is an application for a determination as to whether the prior approval of the Authority will be required to the siting and appearance of the development.

This application is submitted for and on behalf of CTIL and Telefonica UK Limited and comprises:

- Written description of the proposed development – "installation of a 15m high street furniture style telecommunications monopole (to replace existing 12.5m high street furniture style telecommunications monopole), the addition of 1no equipment cabinet and development ancillary thereto";
- At land at Aylmer Road, Highgate, N2 0PL (NGR: 527538, 188620). defined within the plan indicating its location, numbered 100 A;
- Prescribed fee (£385 cheque attached);
- Copy of Developer's Notice, and proof of delivery;
- Confirmation as to whether the developer has had to notify the CAA or MOD or aerodrome operator which clarifies whether the proposal lies within 3km of an aerodrome – the proposal is not located within 3km of an aerodrome; &
- Contact address and email address for developers (supplied overleaf).

For your further assistance, we enclose additional information:-

- 1APP Prior approval form (if appropriate)
- Supplemental drawings - Ref. No's: 200 A, 201 A, 300 A & 301 A;
- Site Specific Supplementary Information will follow under a separate covering letter;
- General Background Information for Telecommunications Development; &
- ICNIRP declaration and clarification statement.

Registered in UK
No: 3651880
VAT Registration
No: 709 2762 24

Registered Office:
Phoenix House
Pyrford Road
West Byfleet
Surrey
KT14 6RA

QMS ISO 9001 REGISTERED FIRM

This application has been prepared in accordance with the Code of Best Practice on Mobile Network Development (July 2013)

The enclosed application is identified as the most suitable option that balances operational need with local planning policies and national planning policy guidance.

Furthermore we would like to assist the Local Planning Authority and would like to offer to arrange a presentation or meeting with your officers and members to discuss the issues if appropriate.

We are committed to maintaining a positive relationship with all Local Planning Authorities and we would be happy to provide any additional information in relation to this application.

We look forward to receiving your acknowledgement and decision in due course.

Yours faithfully



James Lawson
Senior Acquisition Surveyor
Waldon Telecom Ltd

(for and on behalf of CTIL and Telefonica UK Limited)

E-mail: james.lawson@waldontelecom.com

All correspondence in relation to this application should be directed to the above

However, in accordance with The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013, all correspondence to the developers, in the first instance, should be sent to:

CTIL Community Consultation & EMF Enquiries, Building 1330, The Exchange, Arlington Business Park, Theale, Berkshire, RG7 4SA

Email - emf.enquiries@cornerstonemobile.net

The following company addresses are also supplied for information:

CTIL, Building 1330, The Exchange, Arlington Business Park, Theale, Berkshire, RG7 4SA

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

General Background Information for Telecommunications Development

This document is designed to provide general background information on the development of the Vodafone and Telefónica networks. It has been prepared for inclusion with planning applications and supports network development proposals with generic information.

1.0 INTRODUCTION

Over 25 years ago under the Telecommunications Act 1984, a licence was granted to Vodafone and Telefónica to provide wireless (or mobile) phone services utilising unused radio frequencies adjacent to those transmitted for over 50 years by the television industry. Initially, because this wireless technology was new and the number of potential customers unknown, a number of tall masts were used to provide basic radio coverage to the main populated areas. The design strategy used was similar to that used by local radio/television i.e. tall masts to cover large distances over all types of topography.

It is important to note that in recent years form has followed function and digital technology has resulted in the development of smaller equipment. In addition, smaller radio coverage areas have resulted in antenna/mast heights being generally reduced. The industry has also been able to develop low impact designs for use in sensitive planning areas such as in Conservation Areas, on Listed Buildings, and in National Parks etc. The wireless telegraph pole solution is just one example of a design which has minimised impact on visual amenity of the local neighbourhood.

2.0 DIGITAL NETWORKS

The Vodafone and Telefónica 2G digital networks were developed in the early 1990s. This digital technology is often referred to as GSM (Global System for Mobile Communications) which is the common European operating standard enabling phones to inter-connect to other networks throughout Europe and Internationally.

In April 2000, Vodafone and Telefónica were successful in their bids for two of the five licences available to provide a 'Third Generation' mobile telecommunications service known as 3G or UMTS.

In addition to voice services, this technology enables Vodafone and Telefónica to offer high resolution video and multi-media applications. Among other things this enables office services, virtual banking, e-retailing, video conferencing and high quality broadband internet access to be provided to users on the move. This is all made possible by higher rates of data transfer allowing wireless broadband access to the Internet for mobile phones and laptop computer data card users.

The 3G radio base station is designed to provide a service via cells in a similar way as the GSM (2G) system but with a few differences. Due to the increased data transfer, the location of base station sites is even more critical. Base stations must be located where the local demand exists in order to provide the required levels of service, otherwise the network will not function.

In February 2013, Vodafone and Telefónica were successful in their bids for 4G spectrum. 4G (sometimes called LTE (Long Term Evolution)) is the next major enhancement to mobile radio communications networks and will allow customers to use ultra-fast speeds when browsing the internet, streaming videos or sending emails. It also enables faster downloads. To meet this demand and improve the quality of service, additional base stations or upgrades to the equipment at an existing base station may be needed.

Vodafone and Telefónica will ensure they comply with planning policy guidance by ensuring apparatus is installed on existing buildings and structures, including masts wherever possible. However, in spite of these efforts, there are likely to be instances where there is a need to install additional base stations to provide contiguous service. This is largely due to the characteristics of radio propagation at these frequencies, demands on the service and the high data transfer rates.

It is very important to note that mobiles can only work with a network of base stations in place where people want to use their phones (or other wireless devices). Without base stations, the mobile phones we rely on simply won't work.

2.1 How the cellular radio network works

The building blocks of the mobile telecommunications network are called radio base stations which transmit and receive calls to and from mobile phones using radio waves, similar to those used in domestic television and radio equipment. Radio base stations are often associated with free-standing masts, however they can be located on, or even inside, existing buildings and other structures. Vodafone and Telefónica use "radio frequencies" to transmit and receive calls at 900 MHz or 1800 MHz for 2G whilst 3G uses slightly higher frequencies within the 2100 MHz range. 4G will use frequencies within the 800 MHz and 2600 MHz ranges.

2.2 How radio signals are transmitted

The radio signals are transmitted from antennas which are part of the radio base station and cover an area known as a "cell", hence the term "cellular phone". The size of the cell is dependent on a number of factors including: the height at which the radio base station is positioned; the topography of the surrounding landscape; anticipated demand; and the population density in the area.

Radio signal transmission from a radio base station can be likened to water being distributed from a garden sprinkler. The area immediately adjacent to the sprinkler remains almost "dry". However the grass gets progressively wetter moving further away from the sprinkler, until a wettest point is reached. Then the further away from the centre, the ground becomes progressively drier. Radio base stations provide network services in a similar manner. The area immediately beneath the antennas receives limited or, occasionally, no signal. Moving further away, the signal steadily improves until it reaches an optimum level and then gets progressively weaker.

In order to use mobile phones whenever and wherever we are, a network of radio base stations is required to maintain a continuous signal or 'network service' across a geographical area. The network is designed so that the cells from each radio base station slightly overlap. Travelling even a short distance may take us through a number of cell areas. Mobile phones are designed to monitor the strength of signal from surrounding radio base stations and automatically select the clearest signal, which often comes from the nearest site. As you approach the edge of the cell area, the phone will automatically select the adjoining radio base station, to provide a continuous service. This process is known as 'call handover'.

2.3 Factors affecting network services

The siting of a radio base station is largely dependent on the characteristics of the radio signals which they transmit. Physical features such as buildings or landscape can obstruct the signals. In open rural areas one base station can typically cover several kilometres in radius. However in urban areas where surrounding buildings will obstruct the signal, this range can be reduced to as little as a few hundred metres.

2.4 Network Capacity

Radio base station sites can only receive and transmit a limited number of simultaneous calls to and from mobile phones. In areas where the use of phones is particularly high, such as major towns or cities, many sites will reach the maximum number of calls they can process. When a customer attempts to make a call in an area where the network has reached its full capacity, the 'network busy' message is displayed on their mobile phone. In order to continue to meet customer demand and improve the quality of services in these areas, there is a need to increase the capacity of the network to allow more calls to be made.

2.5 Technical Requirements

Vodafone / Telefónica radio engineers identify the need for a new radio base station where the existing signal strength is insufficient to support network requirements, or where demand on the system is such that we need to increase capacity. The location of each radio base station is determined by the following factors:-

- The proximity of adjacent radio base stations and the signal coverage from them.
- The terrain height of the area and surrounding topography.
- The height and density of the buildings and structures within the area.
- The potential customer demand within the area.
- The service type that is required.

3.0 SITE SELECTION PROCESS

The following site selection procedures apply to each new installation to identify and sequentially discount alternative site options:-

1. Following a technical review which identifies need, Vodafone / Telefónica radio engineers undertake a desktop analysis to identify the best way of meeting the site requirement. This is completed by using computerised radio propagation modelling tools. These tools show every site on the existing networks and identifies those areas where insufficient signal level exists or where there is a need to increase capacity.

2. The desktop search also identifies other operators' existing telecommunications installations. This interrogation of databases ensures any mast-sharing opportunities are maximised. Where available the LPA's mast register is also reviewed.

3. The radio engineers define a search area, which is then issued to an acquisition agent who undertakes a detailed ground search with the radio engineer to identify suitable options.

4. The acquisition agent will obtain site-specific details to identify those sites that are viable options. The possible options are short-listed according to those that combine the following: location within or close to the search area, a willing landlord with acceptable commercial terms, adherence to planning and environmental policy, and other site specific issues such as initial power and link availability. These options are then returned to the radio engineers for a computer modelling assessment, taking into account the ground height, potential available antenna height and surrounding obstructions.

5. Discussions are offered to the local planning authority to consider local policies and any protected areas and to agree additional public consultation if required. These discussions are used to identify a 'preferred' option.

6. A plan for local consultation is drawn up, and where appropriate, a consultation exercise is undertaken with the local community.

7. Finally a site survey provides a full structural analysis of the site including confirming power routes and how the site will be linked into the network. Terms with the landlord are then finalised, detailed plans prepared and the application submitted.

Vodafone and Telefónica are committed to ensuring the number and visual impact of any additional sites is minimised.

4.0 PLANNING POLICY GUIDANCE ON TELECOMMUNICATIONS

The National Planning Policy Framework (NPPF) was published on 27th March 2012. The NPPF supports high quality communications infrastructure and recognises it as a strategic priority. At para. 42 it states that: "Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services."

The NPPF goes on to state at Para. 46 that: "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."

5.0 SITE / MAST SHARING

Vodafone and Telefónica actively encourage and support site sharing for both commercial and environmental reasons. All operators are required to explore site-sharing opportunities under the terms of their licences. Vodafone and Telefónica have implemented a number of measures to identify and maximise site-sharing opportunities.

6.0 COUNCILS

6.1 Moratoria

Local authorities should make suitable council owned property available to network operators for base station development. If suitable council sites are not made available, operators may have to look for alternative sites which the local community might find less acceptable.

Moratoria may also increase the number of new sites needed as council owned buildings are often better suited for base stations e.g. tall buildings. The operators believe it is preferable to deal with proposed developments on council property on a case by case basis.

6.2 Mast register

Guidance in the Code of Best Practice on Network Development recommends that local authorities develop a register of local base stations.

Local Planning Authorities should ensure that any mast register is kept up to date

7.0 CONSULTATION WITH SCHOOLS

The operators fully comply with Government Guidance on pre application consultation with schools and colleges. They provide evidence to the local planning authority that they have consulted the relevant body of the school or college.

The Code of Best Practice on Mobile Network Development gives guidance on the factors operators should consider when determining whether consultation is required, as each development is different. These factors are equally applicable for Local Planning Authorities who carry out their own consultation once the application has been submitted.

A recent report stated that there is no scientific basis for siting base stations away from schools (NRPB report, January 2005)

8.0 LEGAL CASES

The following legal cases may be helpful;-

8.1 Harrogate case November 2004

The Court of Appeal gave a judgment that Government Planning Guidance in PPG8 (now replaced by the NPPF) is perfectly clear in relation to compliance with the health and safety standards for mobile phone base stations. The Court of Appeal and the High Court both upheld Government policy in response to a planning inspector's decision that departed from that policy and failed to give adequate reasons for doing so.

8.2 Winchester case November 2004

The Court of Appeal decision upheld an earlier decision by Mr Justice Sullivan that a mobile phone network operator should not use its compulsory acquisition powers as part of its day to day radio base station siting processes.

The Court of Appeal agreed with Mr Justice Sullivan that these far-reaching statutory powers were never intended for use in day to day planning situations and should be used by an operator only as a last resort when there is no other siting alternative.The House of Lords on 16 March 2005 refused leave to appeal the Court of Appeal ruling.

8.3 Bardsey case January 2005

The Court of Appeal confirmed that the permitted development regime for mobile phone base stations is compliant with the Human Rights Act.

This was a case in which a local planning authority failed to comply with its obligations to act within the 56 day period provided under the permitted development regulations.

9.0 FURTHER INFORMATION

We trust the above answers your main queries regarding our planned installation.

The enclosed site-specific details will identify any alternative discounted options and reasons why they were rejected and how the proposed site complies with national and local planning policies.

The Local Government Ombudsman's Special Report on Telecommunication Masts gives some positive recommendations and advice to Local Planning Authorities in determining Prior Approval applications. A copy of the report is available at http://www.lgo.org.uk/pdf/phone-masts-sr.pdf