SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Lisle Court	Site Address:	Lisle Court Cricklewood Lane London NW2 2EP
National Grid Reference:	524334, 186127		
Site Ref Number:	55594	Site Type:[1]	Macro

2. Pre-Application Check List

Site Selection (for New Sites only)
(Would not generally apply to upgrades/alterations to existing sites)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	**No**
If no explain why: No register available.		
Were industry site databases checked for suitable sites by the operator:	**Yes**	No
If no explain why: Yes		

Site specific pre-application consultation with local planning authority

Was there pre-application contact:	**Yes**	No
Date of pre-application contact:	30 October 2023	
Name of contact:	Ashley Niman	
Summary of outcome/Main issues raised: Pre-application correspondence was sent to the London Borough of Barnet by email on 15 October 2023. The correspondence was noted as a 'Licence Notification' submission and not a request for pre-application advice. Once clarified it was confirmed by Waldon Telecom that we would proceed to a formal application.		

[1] Macro or Micro

Community Consultation

Rating of Site under Traffic Light Mode If Required:	Red	**Amber**	Green
Outline Consultation carried out: Pre-application correspondence was sent by email on 25 October 2023 to the Childs Hill Ward Councillors – Councillors Giulia Innocenti, Matthew Perlberg and Nigel Young. Letters were also sent to neighbouring properties by Royal Mail on 25 October 2023. Letters were sent to the following properties: Flat 1-40 Lisle Court, Cricklewood Lane, NW2 2EP Flat 1-12 Manor Court, 77-79 Cricklewood Lane, NW2 1HW Flat 1-4, 71 Cricklewood Lane, NW2 1HR			
Summary of outcome/Main issues raised: No responses have been received.			

School/College

Location of site in relation to school/college *(include name of school/college):* The following schools and pre-school establishments are located close to the site: Childs Hill Primary School, Dersingham Road St Agnes Catholic Primary School, Thorverton Road The Little Learners Montessori At Cricklewood, St Vitus Hall, Cricklewood Lane Little Lamps Nursery, Sadhu Vaswani Centre, Cricklewood Lane
Outline of consultation carried out with school/college *(include evidence of consultation):* Consultation letters were sent to the establishments email on 25 October 2023.
Summary of outcome/Main issues raised: No responses have been received.

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?	Yes	**No**
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	**No**
Details of response: N/A – Full planning application.		

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	No
Date served:	N/A – Full planning application.	

3. Proposed Development

The proposed site:

The host building is located within the Cricklewood area of North London. The surrounding area is typically urban in nature and comprises of mixed land uses with the busy A41 dual carriageway to the east and Cricklewood Train Station to the west. The immediate area consists of retail and densely residential properties with a number of schools and playing fields in the vicinity. The building itself is four storeys high and consists of retail units on the ground floor with flats on the upper floors. The roof is 11.85 metres in height and is flat with handrailing round the edges of the roof. A photograph of the building is included below:

The application site is removed from any listed buildings or sensitive land designations.

This application seeks the introduction onto the roof of Lisle Court of mobile telecommunications infrastructure required to ensure continued provision of mobile services following the loss of an operational site from the network for reasons beyond the operator's control. That infrastructure comprises 6 no. antenna apertures to be grouped into sets of two and located on support poles along with 4 no. 600mm transmission dishes and the installation of 3 no. equipment cabinets to be mounted on a new support platform, with development ancillary thereto. The equipment would be located on the far western side of the building.

This application is a resubmission of a previously approved scheme. Planning application 19/4527/FUL was refused by the London Borough of Barnet on 10 October 2019. A planning appeal was lodged, and the appeal was allowed on 25 November 2020. Since the appeal decision there have been some minor changes to the design of the equipment, compared to approved scheme. This is due to the addition of 5G coverage to the proposed development, to also allow the scheme to provide the latest technology to the area.

The scheme is amended in the following ways:

The number of antennas and dishes remain unchanged. However, to also provide 5G coverage to the area, different antennas are required. These are longer, and there is also a requirement for the base height of these antennas to be higher to meet ICNIRP requirements. The antennas are therefore taller and higher on the building (this will be explained fully in the 'Reason for choice of design, section below).
The number of equipment cabinets on the roof of the building is reduced from four to three.
The cabinet proposed at ground level has now been removed.

Type of Structure *(e.g. tower, mast, etc):*	*Rooftop*
Description: Revised scheme - the installation of 6 no. antenna apertures, 4 no. 600mm transmission dishes and 3 no. equipment cabinets at rooftop level along with development ancillary thereto.	
Overall Height:	19.39 metres (to top of antennas)
Height of existing building *(where applicable):*	11.85 metres
Equipment Housings:	
Link AC Cabinet: Airo Cabinet: RBS6130 cabinet:	1.2m (width) x 0.6m (depth) x 1.6m (height) 0.75m x 0.6m x 2.1m 0.65m x 0.7m x 1.1m
Materials *(as applicable):*	
Tower/mast etc. – type of material and external colour:	Steel with a galvanised finish.
Equipment housings – type of material and external colour:	Steel with a grey finish (RAL7035).

Reasons for choice of design:

<u>Technical Objective and Technical Requirements</u>

The objective of this proposed development is to ensure coverage to the area is replaced and enhanced, and disruption to the wider network is not caused, due to the proposed decommissioning of a nearby telecommunications site (Lambo Bar previously known as The Tavern Public House, 75 Cricklewood Lane, London, NW2 1HR (NGR: 524294, 186215)). This telecommunications site is being lost from the network for reasons beyond the operator's control. When a site is decommissioned, the obvious impact felt is the loss of coverage that that site provided. However, it can also cause greater disruption to the wider network. This is because each site connects to another, that one to another and so on, so if one is decommissioned the impact can reach far further than the immediate consumers.

The objective, and need, for a replacement site in this area is henceforth established and justified. As previously noted, this is a resubmission of a previously approved application. This is a revised submission and is required due to the addition of 5G services to the proposed development.

By way of background information, in designing a radio base station it is necessary to incorporate certain vital elements and to works around a number of technical constraints. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signal(s), the supporting structure that holds the antennas in the air (or fixes them to a building or structure) and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units).

Other elements necessary for the base station to function are the power source (a meter in a cabinet or a generator on sites where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas, link dishes and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

As set out above the scheme is amended in the following ways from the previously approved development:

The number of antennas and dishes remain unchanged. However, to also provide 5G coverage to the area, different antennas are required. These are longer, and there is also a requirement for the base height of these antennas to be higher to meet ICNIRP requirements. The antennas are therefore taller and higher on the building.
The number of equipment cabinets on the roof of the building is reduced from four to three.
The cabinet proposed at ground level has now been removed.

In terms of the antennas, both the size and height has increased. The approved antennas measure 2.0 metres in length, and the proposed amended antennas are 2.7 metres in length. This is accounted for by the addition of the 5G technology to the scheme, for both EE and H3G. The addition of 5G also affects the ICNIRP requirement, and this results in the underside of the antennas needing to be higher than the approved development. Therefore, there is an overall increase in antenna height of 1.54 metres.

Visual Amenity

The applicant gives due regard in designing all new sites to limit the visual impact through good design. In this instance the proposed installation is subject to technical and build constraints. That notwithstanding, it is submitted that the appropriate siting and design put forth mitigate any potential impact on the site and its surroundings to an acceptable level.

To achieve the required replacement coverage and network improvement for both EE and H3G, 6 no. antenna apertures are needed. An existing building is proposed to be utilised, and the bulk and scale of the existing building and equipment ensures the impact of the development would be kept to an acceptable level. The support poles, which will support the antenna apertures, will also be able to accommodate the dishes required to retain and enhance the network services in the area, for both EE and H3G. This will also ensure that the Cricklewood area of London will be at the forefront of the next advance in technology being deployed. Furthermore, the height of the antennas is the lowest which would provide the required level of coverage and also to ensure it complies with ICNIRP guidelines.

Dishes provide a link between base stations within the network. The size and height of the dishes is determined by the location of these surrounding neighbour cells. The size and number of dishes has been kept to the minimum required for operational efficiency and the associated impact of this addition on the surroundings would be minimal.

Radio signals are generated within radio equipment housing cabinets and 3 no. equipment cabinets are now required. This is a reduction compared to the approved scheme where four cabinets were proposed on the roof and one at ground level (which has now been removed from the proposed development). The cabinets will be placed in a neat arrangement at roof level on the steelwork support frame set back from the edge of the rooftop. Views of the cabinets will be limited from ground level.

The amendments to the scheme are considered to be relatively minor and would only have a minimal additional impact. This additional impact would be outweighed by the additional benefit of now providing new 5G coverage to the surrounding area, for both EE and H3G.

The minimal impact on visual amenity has been kept to an acceptable level, one which would be outweighed by the significant benefits of the proposal in terms of continued and enhanced services to the

surrounding area. It is considered, overall, that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below). International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or 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 or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, EE Ltd & H3G UK Ltd operates its networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of EE and H3G's networks, the radio base station that is the subject of this application will be configured to operate in this way. 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.	**Yes**	No

4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

Reason(s) why site required e.g. coverage, upgrade, capacity

The development is required to provide replacement coverage, along with improved connectivity and network enhancement for EE and H3G in the area. The site would provide replacement 2G, 3G and 4G coverage for EE and 3G and 4G coverage for H3G, along with new 5G coverage for both EE and H3G.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other and by cables or wireless technology to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. Because base stations are low powered radio transmitters, they each have a limited range, meaning that they generally need to be located close to the area requiring coverage.

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High quality communications infrastructure is essential for sustainable economic growth and that high-speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.

The UK Government recognises the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

The Digital Infrastructure Minister, Matt Warman, in his keynote Speech at the Connected Britain Conference 2020 referred to the internet as the *"fourth utility"* and went on to state that *"for countless people across the country, having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity".* He went onto acknowledge the importance of connectivity during the Covid pandemic, *"The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown – and is now more important than ever as we head into recovery"* and also recognised that "*changes such as increased working from home will stay with us for the foreseeable future".*

Most recently the Government has referred to the importance of the digital infrastructure as being integral within its paper on "Levelling Up the United Kingdom" (2 February 2022) in which it was recognised that "*improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working.*

More broadly, high quality digital infrastructure can deepen local labour markets through remote working, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas".

It is considered that when the balancing method advocated in the NPPF is applied to the proposal, where the need and significant public benefit of ensuring continuous network coverage is provided, is balanced

against the appearance and level of associated visual impact of the proposed site, that the application proposal is positively in favour and is considered wholly appropriate.

As recognised by the London Assembly's Regeneration Committee within its "*Digital Connectivity in London*" report, published June 2017, digital connectivity is now widely regarded as the "'*fourth utility', an everyday necessity alongside water, gas and electricity*" and also noted that "*mobile broadband is, and will continue to be, an essential complement of fixed broadband*". It is no longer a luxury, but a service essential to modern life.

As introduced above in this document, the objective of this site is to provide replacement coverage and capacity to the area. The installation of this proposal will also provide new 5G coverage and capacity.

2G was the second generation of cell phone transmission, it introduced data services for mobile, starting with SMS text messages.

3G was an extension to this and enabled the use of data. The main technological difference that distinguishes it from 2G technology is the use of packet switching rather than circuit switching for data transmission. Increased data rate to a minimum of 2 Mbit/s for stationary or walking users, and 384 Kbit/s in a moving vehicle.

Similarly, 4G was another extension and enabled an increased speed in connection. It Supports a minimum data rate of 1 Gbit/s for stationary and 100 Mbit/s for mobile operation. In simple terms the benefit to users is that 4G that supports mixed data, voice, video and messaging traffic at significantly faster speeds than 3G. This results in ultra-fast internet browsing, video streaming, gaming, e-mail and downloads. In simple terms 4G allows for data transmission as well as text services as mobile phones, computers and other portable electronic devices access the internet wirelessly and so for this reason 3G technology is being phased out.

EE will become the Emergency Services Network Provider and their 4G network will be utilised for this purpose. It is therefore even more essential to maintain all current services for not only current users but for the emergency services also.

5G is the latest technology which is still being rolled out nationwide, for this reason, there is not yet a blanket of 5G coverage and this Site works towards achieving reliable 5G services for users at home and on the go. As 5G becomes more widespread, a comprehensive covering of 5G reception can be expected.

The proposed site will not only provide replacement coverage to the surrounding area but will also bring replacement and additional capacity. Capacity is the volume of call and data traffic that can be handled by any one base station at any given time and is a critical network consideration, especially important in high traffic areas with large populations where call volume is higher and cell areas often smaller due to the density of development. Indoor coverage provision is imperative across the UK, arguably more so within densely populated areas such as this where the ongoing construction of new apartment blocks means the requirement for additional capacity is growing rapidly. Without the installation subject to this application, the vital indoor levels, which allow customers to access services from within buildings, would simply not be achieved.

In 2019, Barclays released a report titled "5G: A transformative technology" which included projections of economic growth based on the uptake of 5G by businesses. The report included three scenarios, a pessimistic view, a central view and an optimistic view which considered the outcome of the development of a national 5G network at a slower rate, orderly pace, or faster uptake, respectively. The annual business revenue by 2025 was projected to increase by £8.3bn in the slowest scenario and by £15.7bn in the fastest scenario. This would add 101,300 extra jobs by 2030 in the slower paced uptake, and 171,900 additional jobs in the faster uptake. This is just one example of the huge economic advantage that a reliable, widespread 5G network could achieve. The Application Site forms an integral part of the Network and works towards achieving economic growth for the UK economy.

It is our view that this proposal is exactly the type which the government is endorsing. The Application Site would work with the surrounding infrastructure to ensure a good stable connection even as users transfer from one cell area to the next. The Application Site will enable both EE and Three to provide replacement coverage to the area as well as bring new 5G technology, benefitting both voice and data services. The Application Site will increase capacity as well as improving the resilience of the Network in this area. The Applicant has designed the site so as to have minimal aesthetic impact on the surrounding area and yet meet the coverage need.

In 2022, the UK Government published the Code of Practice for Wireless Network Development in England. This sets out the legal and policy framework as well as the principles that Mobile Network Operators should follow. Within this document, the Government recognises that *"Digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK."*

The Government also notes the importance of widespread connectivity, enabling users to access services at home and on the go: *"As the demand for mobile data in the United Kingdom is increasing rapidly, **it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel**."*

At a local level, this installation allows for an increase in home working, by providing the opportunity to create a "virtual office", reducing the need to travel for work as a consequence, which is helpful in supporting the sustainable development agenda.

It is therefore very important for 'mobile only' households that live and work and any businesses that operate in this part of the LPA's area, together with visitors and others who are staying in or travelling through the area, that the necessary indoor RF coverage is provided to enable them to have satisfactory mobile telephone and internet access.

On a wider scale, the proposal would contribute towards the country's connectivity and digital economy future. Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion.

The very high level of mobile phone use and ownership within the UK population is a clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

The benefits of reliable mobile connectivity and 5G provision are widely recognised. The government recognises the importance of advanced communications infrastructure, such as the proposed development, as a key driver of economic growth. It considers digital connectivity as an essential service that should be readily accessible to everyone. In the latest report by the Department for Science, Innovation and Technology 'UK Wireless Infrastructure Strategy' April 2023, in the foreword the Secretary of State states that "*Connectivity has brought benefits for British households and British business, boosting growth, productivity, and opportunity for all. And change shows no sign of stopping. In fact, we find ourselves on the brink of a new revolution which promises to transform the world once more."* She further states that *"5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone 5G will drive growth in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. 5G can improve our public services, too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis.*" "*This is an incredible opportunity; widespread adoption of 5G could see £159bn in productivity benefits by 2035. And it is exactly the kind of opportunity which the Department for Science, Innovation and Technology was created to seize. It is my personal mission as the Department's first Secretary of State to put Britain right at the forefront of scientific and technological progress. By bringing together world-class research and a*

dynamic business ecosystem, we can harness enterprise and innovation to grow the economy, driving forward the delivery of one of the Prime Minister's five priorities."

The report sets a bold ambition for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030. "*Given the substantial potential that 5G offers for businesses and public service delivery, we are setting out a bold vision for the next generation of our national networks to galvanise investment across our economy. We want to move beyond the basic 5G that is being deployed now over 4G networks to build higher quality, standalone 5G networks that do not rely on older infrastructure. We also want to extend 5G coverage well beyond cities and towns to all populated areas of the UK, including rural villages and communities."*

In the same report, in the foreword by the minister of State, she states that *"delivering world-class digital infrastructure to all Britons is a fundamental mission of this government - and our efforts to build it the modern equivalent in scale and ambition to the Victorians' construction of the railways. Our plan is for every corner of our country to get lightning fast connectivity, not only to give people real choices about where to live and work today but so they will not be left out of future technological revolutions because of poor infrastructure." "Although it is impossible accurately to predict when large scale demand for 5G and other forms of advanced wireless connectivity will emerge and how widespread that will be, mobile data provided over public mobile networks has grown 40% per year on average over the last decade and we expect to see continued growth in data traffic over the next decade. Ofcom's Mobile Market Review suggests data growth could range from a 25% increase per year to 2030 to 55% increase per year to 2030."*

The importance of mobile technology, more generally, in the UK, and its contribution to the sustainability agenda is further emphasised in a series of annual communication market reports published by OFCOM, the latest version is the 'Communications Market Report 2022'. According to this report, telecoms revenues made a £31.1 billion contribution to the UK economy in 2021 of which 12.3 billion was generated from retail mobile telecoms services. The report also highlights the increase in the use of mobile technology.

The growth of mobile usage and increase in demand for mobile data is further highlighted in Ofcom's report 'Mobile networks and spectrum - Meeting future demand for mobile data (9 February 2022)'. According to this report *"In recent years we have seen an average 40% year-on-year growth in demand for mobile services provided over public mobile networks. This growth has been driven by the development of new applications and enabled by evolving technologies and consequent changes in consumer behaviour" (paragraph 2.6). The demand for mobile data is expected to "continue to grow as we rely on it ever more to carry out daily activities like shopping, gaming, banking and watching movies. Demand is likely to be stimulated further as new and more sophisticated applications are developed, and by the development of machine-to-machine and machine-to-device applications"* (paragraph 2.7).

In paragraph 1.1 of *"Ofcom's future approach to mobile markets and spectrum" report, it is stated that "We expect demand for mobile data to continue to grow as greater use is made of data-hungry services and as new technologies enable new uses." "Network quality is likely to be of growing importance to customers*" (paragraph 1.2). Reliable and advanced infrastructure like the proposed development is required to support the increasing demand on the networks and to support the latest 5G technology required to deliver advanced mobile capabilities**.**

There is a clear need for continuity of services as the way people lead their lives is changing, as our dependence on these mobile networks increases. The immergence from lockdowns has seen a continuation of homeworking for a considerable proportion of the Country's workforce with the likelihood that this will continue, which has entailed the conducting of business meetings and attending conferences online which are integral in the economic recovery. Online grocery shopping and video calls to family members and friends have also continued and so the need for this replacement site is driven by our increased dependence on Operator networks that has grown year-on-year.

As is often the case with the introduction of new mobile technologies, we are aware that there has been a lot of coverage on the internet and in the media with regard to the possible health implications of 5G

rollout in the UK. Exposure to non-ionising radiation is regulated and limited and all UK base stations are required to comply with health and safety guidelines set by the International Commission on Non-Ionisation Radiation ('ICNIRP'). This is an independent body of scientists that was set up to provide advice and guidance on the health and environmental effects of non-ionizing radiation which is used in mobile telecommunications. The guidelines set by the commission are in place to protect all members of the public, of all ages and in all states of health and wherever they might be in relation to a base station for 24 hours a day. They are backed by the World Health Organisation, the EU and the UK Government.

The ICNIRP reviewed and updated their guidelines in 2020. The new guidelines provide better and more detailed exposure guidance in particular for the higher frequency range, above 6 GHz, which is of importance to 5G and future technologies using these higher frequencies. The ICNIRP chairman, Dr Eric van Rongen, has advised that "the most important thing for people to remember is that 5G technologies will not be able to cause harm when these new guidelines are adhered to". We confirm that they are adhered to by H3G as well as the UKs other mobile operators.

The Director of Mobile UK has also commented on the updated ICNIRP guidelines and stated that "*The consistent conclusion of public health agencies and expert groups is that compliance with the international guidelines is protective for all persons (including children) against all established health risks*." (Our emphasis).

Public Health England (PHE) commented in 2019 that "*It is possible that there may be a small increase in overall exposure to radio waves when 5G is added to an existing network or in a new area. However, the overall exposure is expected to remain low relative to guidelines and, as such, there should be no consequences for public health*" https://www.gov.uk/government/publications/5g-technologies-radio-waves-and health/5gtechnologies-radio-waves-and-health

There has been a significant amount of other independent, peer reviewed, scientific research by recognised bodies that has been carried out into the technology used in mobile telecommunications over several decades. The consensus of the international scientific community is that there has been no convincing evidence to date that RF field exposure below the internationally agreed guideline levels applied in the UK (ICNIRP) causes negative health effects in adults or children. This includes recent reviews of 5G technology.

In January 2019 the Finnish Radiation and Nuclear Safety Authority (STUK) concluded that "*In the light of current information, exposure to radio frequency radiation from base stations will not rise to a significant level with the introduction of the 5G network. From the point of view of exposure to radio frequency radiation, the new base stations do not differ significantly from the base stations of existing mobile communication technologies (2G, 3G, 4G*)" https://www.stuk.fi/aiheet/matkapuhelimet-jatukiasemat/matkapuhelinverkko/5g-verkon-sateilyturvallisuus

Similarly, and also in January 2019, the Norwegian Radiation and Nuclear Safety Authority (DSA), commented that "*The overall research shows that the radiation from wireless technology is not hazardous to health, as long as the levels are below the recommended limit values. This is the prevailing view among researchers in many countries today, and it is supported by the EU Scientific Committee. We have used cell phones and radio* 5G and transmitters *for decades and much research has been done on how this affects our health. Risk factors of importance to public health have not been found. With the knowledge we have today, there is no need to worry that 5G is hazardous to health*." https://www.dsa.no/temaartikler/94565/5g-teknologi-og-straaling.

All EE and H3G base stations are designed to be fully compliant with ICNIRP guidelines, and a certificate of compliance is included with the application. In addition, a document entitled 'Mobile Health Fact Sheet' is included with the application documents. This provides a simple explanation of 5G and the equipment behind it, including the antennae and the masts, in particular in relation to health issues. In addition, further details of the new 5G technology are included within this application in the form of the '5G and Future Technology' document.

Predictive coverage plots are included with the application to confirm the need for the site. Plots are included for both EE and H3G, with 4G coverage plots for both Operators. The area maps for the plots shows the Lambo Bar site which is to be lost from the network (annotated 25047 - NTQ), along with the application site (55594 - REP1).

For EE, plots are included to show the coverage provided from the Lambo Bar site, the current position without a site in the area, and coverage with the replacement site in place. For H3G, current plots and proposed plots are included. For all plots the ideal level of coverage is denoted as red on the plots. The plots confirm that, without the Lambo Bar site there would be a reduction in coverage. The application site would provide a good level of replacement coverage to the area.

5. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

Site	Site Name and address	NGR:	Reason for not choosing
GF	Cricklewood Lane Streetworks, NW2 1HW	524414, 186183	This option would entail a streetworks style installation. Given the densely residential nature of the area it was considered that any structure in this location would be an incongruous addition to the street scene and therefore an inferior planning option than the application site.
GF	Claremont Road Streetworks, NW2 1TD	523942, 186177	This option would entail a streetworks style installation. Given the densely residential nature of the area it was considered that any structure in this location would be an incongruous addition to the street scene and therefore an inferior planning option than the application site. Furthermore, this option is located further from the existing site than the application site and therefore would not provide as suitable replacement coverage.
RT	Ivy Hall, 100 Cricklewood Lane, NW2 1TD	524153, 185997	Even though the building is similar in height to the application site, it is located on lower ground and therefore this option is an inferior radio option as it would not provide the required replacement coverage.
GF	Childshill School, Dersingham Road, NW2 1SL	524462, 186258	The building is not suitable for this type of development. A greenfield option would be the only solution and this option is located further from the existing site than the application site and therefore would not provide as good replacement coverage.
RT	71 and 73 Cricklewood Lane, NW2 1HR	524345, 186169	These options are located directly next door to the site which is earmarked for decommissioning. The equipment on the existing site is old and changes have arisen from the fact the current kit is old and no longer deployed. The modern equivalent of that apparatus would be used for the replacement site instead. This equipment is slightly larger and there is the requirement for more ancillary equipment in order to provide all the required technologies in line with the network requirements in this area, which have obviously changed over

			time with increasing network demand and technological advances. Therefore, these buildings are not technically suitable to accommodate the replacement.
RT	140 Cricklewood Lane, NW2 2DT	524277, 186108	The building is lower in height to the application site and is located on lower ground and therefore this option is an inferior radio option as it would not provide the required replacement coverage.
RT	134 Cricklewood Lane, NW2 2DP	524248, 186099	The building is too low to provide the required replacement coverage, furthermore, there is insufficient room for a greenfield installation.
RT	St. Agnes Catholic Church, 35 Cricklewood Lane, NW2 1HR	524225, 186132	The building is not suitable for this type of development and a greenfield option is considered an inferior planning option to the application site as the application site entails utilising an existing structure.
RT	120 Cricklewood Lane, NW2 2DP	524229, 186085	This option is located further from the existing site than the application site and therefore would not provide the required replacement coverage.
RT	Sadhu Vaswani Centre, 25 Cricklewood Lane, NW2 1HP	524176, 186099	The building is not suitable for this type of development and a greenfield option is considered an inferior planning option to the application site as the application site entails utilising an existing structure. Furthermore, it is located further from the existing site than the application site and therefore would not provide the required replacement coverage.
RT	Virgin Active, 108-110 Cricklewood Lane, NW2 2DS	524182, 186029	Even though the building is similar in height to the application site, it is located on lower ground and therefore this option is an inferior radio option as it would not provide the required replacement coverage. Furthermore, a greenfield option is considered an inferior planning option to the application site as the application site entails utilising an existing structure.
GF	Station House Reclamation, Cricklewood Lane, NW2 1HG	524041, 185929	The building is not suitable for this type of development and there is insufficient room for a greenfield site. Furthermore, it is located further from the existing site than the application site and therefore would not provide the required replacement coverage.
GF	Cricklewood Station, Cricklewood Lane, NW2 1HL	524041, 185929	There is insufficient room for a greenfield site. Furthermore, it is located further from the existing site than the application site and therefore would not provide the required replacement coverage.
GF	Donoghue Business Park, Claremont Road, NW2 1RR	523857, 186272	This option is located on lower ground and is further away from the existing site than the application site and therefore is an inferior radio option as it would not provide the required replacement coverage.
RT	Avenue Court, Farm Avenue, NW2 2PT	524473, 186161	The building is lower in height to the application site and is further from the existing site. Therefore, this option is an inferior radio option as it would not provide the required replacement coverage.

If no alternative site options have been investigated, please explain why:

N/A

Additional relevant information:

Environmental Information:

The application site is not located in an area considered to be environmentally sensitive, or within an identified protected habitat or protected species area. The proposal will subsequently not have any potential negative impacts on any sensitive habitats or species. Furthermore, a check of the Environment Agency website has confirmed the site is not within a Flood Zone area.

As far as practicable the proposed development has been designed to keep to a minimum the impact on amenity and the design of the development ensures there would be only a limited impact which would not be sufficient to harm visual or residential amenity.

Siting and Appearance

It is considered that the proposed location is the least visually intrusive site and design available to the applicant which also ensures suitable replacement and enhanced coverage can be provided. As far as practicable the proposed development has been designed to keep to a minimum the impact on amenity and the design of the development ensures there would be only a limited impact which would not be sufficient to harm visual or residential amenity.

The selected siting is considered wholly appropriate. Whilst the equipment would be visible, its impact would not be excessive, and the design keeps impact on visual amenity to an acceptable level.

Despite the increase scale of the revised proposal, it is considered the development would only have a minimal additional impact on the surrounding area. This minimal impact would be outweighed by the substantial public benefits of the proposal, in terms of continued and improved connectivity to the area, including the provision of the latest 5G technology (which is the reason for the slightly increased scale).

As set out previously in this document, this application has been submitted following a previous proposal on the site, which was granted consent at appeal in 2020. A copy of the appeal decision is included with the application documents. The decision letter focussed on the impact of the development on the character and appearance of the area.

In terms of the character and appearance of the area, the Inspector noted (at paragraphs 5 – 7):

> *"9. In my judgement the equipment cabinets would not be features that would be seen from the Cricklewood Lane, nor register in views from the distance. The two antennas at one end of the framework and the two dishes at the other end, at the front of the roof, would be the only elements that would have any obvious impact on views from Cricklewood Lane. I consider that they would be only a little more prominent in the street scene than the existing equipment on the former Tavern public House.*
>
> *10. As far as long views are concerned, I could find no location to the north-west, in the roads at the back of Cricklewood Lane, from where the appeal equipment might be seen, and no viewpoints from that direction have been drawn to my attention. In the other direction, the Council draws attention to Dersingham Road and Harman Close as areas where the equipment could be seen in long views. I could find no point in Dersingham Road from where I considered that the equipment would be anything but a marginal intrusion into the view. I walked the length of Harman Close, which is nearer to Lisle Court, but for the most*

part the view of the appeal equipment would be screened by trees. A number of these trees are conifers, blocking the view entirely, but some of them are deciduous which, at the time of my visit, had already lost a good proportion of their leaves. With the loss of leaves I was able to see the relevant roof top of Lisle Court, but at this distance the antennas and dishes would be diminished in the view by even bare branches.

11. As a result of my tour of the area and these observations, I conclude that the effect of the new antenna and dishes on the character and appearance of Lisle Court and the wider streetscape would be relatively limited, the most obvious view being from Cricklewood Lane. This part of Cricklewood Lane is a busy thoroughfare with commercial premises at ground level. In my opinion the appeal equipment would become an acceptable part of the street scene and a feature of Lisle Court in a relatively short space of time, especially since the roof is at a height of almost 12m, well above most people's field of vision as they go about normal daily life."

The Inspector concluded at paragraph 16: *"I conclude that the effect of the new antenna, dishes and cabinets on the character and appearance of the property and the wider streetscape will be limited. This limited harm, which local plan policy seeks to avoid from the installation of telecommunications equipment, is outweighed by the national policy which places considerable emphasis on providing and maintaining high quality and reliable communications infrastructure. Therefore, the appeal will be allowed."*

Therefore, the revised design would not materially change the situation as set out in the decision letter when the Inspector approved the previous development. It is an acceptable development to provide replacement and enhanced coverage to the area.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2023) (NPPF)

The NPPF provides national policy for all planning matters. The specific points of interest relating to this telecommunications installation are noted below.

Paragraph 7 of the NPPF states "*The purpose of the planning system is to contribute to the achievement of sustainable development*", and in paragraph 10 that "*at the heart of the Framework is a **presumption in favour of sustainable development***".

Paragraph 11 states *"Plans and decisions should apply a presumption in favour of sustainable development…*

"For decision-taking this means:
(c) approving development proposals that accord with an up-to-date development plan without delay; or
(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Paragraph 20 states that strategic policies should "*make sufficient provision for:*
*b) infrastructure for transport, **telecommunications**, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"*

Further to this, paragraph 38 states that "*Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area*."

The Application Site will allow for both continued and enhanced provision of reliable mobile communications services to the area area, which brings about substantial public benefits both socially as well as potentially allowing for businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the '*virtual office'*, thus reducing the need to travel and contributing to the sustainability agenda. The loss of these services, where a wholly suitable option is available to prevent it by allowing for provision of replacement infrastructure, goes against the aims of the Government as expressed within the NPPF.

Leading on from this, Section 10 of the NPPF addresses supporting high quality communications infrastructure. Paragraph 118 sets out that "*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."* The Application Site is exactly the kind which is working towards this Government aim.

While supported, the number of base stations is encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 119 states that "*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*". Whilst a new site is proposed within this application, it will be replacing an existing site within the area and so the number of base station will remain neutral. Furthermore, the proposal entails utilising an existing building and involves both EE and H3G sharing the site. It has been detailed that numerous siting options were considered prior to the final decision being made to deploy a replacement rooftop site, but that none proved both feasible and more suitable than the option now put forward.

It should be noted that paragraph 122 states that "*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*". A certificate of compliance with ICNIRP guidelines is included within this application.

The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal, to provide replacement high-quality services in the area, including the addition of new 5G technology, will assist in achieving these objectives. The proposal outlined within this document is in complete accordance with the guidance as set out in the National Planning Policy Framework.

Development Plan Policy

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, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plan for London Borough of Barnet, relevant to the proposal, comprises:

- The London Plan: The Spatial Development strategy for Greater London 2021;
- London Borough of Barnet Core Strategy DPD (adopted 2012) and Development Management Policies DPD (adopted 2012).

The London Plan

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.

Policy D2 Infrastructure requirements for sustainable densities – this policy recognises that infrastructure providers, which includes mobile Operators, will need to provide additional infrastructure capacity to meet future development. Increasing network capacity is one of the aims of this proposal:

'Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), ***boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist*** *at the appropriate time'* (part B) (emphasis added).

Policy SI 6 Digital connectivity infrastructure – this policy is more explicit in requiring that new developments should meet increased demand for mobile services. The use of building rooftops to accommodate communications infrastructure, as is proposed at the Application Site, is also encouraged:

'To ensure London's global competitiveness now and in the future, development proposals should: (2) ***meet expected demand for mobile connectivity*** *generated by the development… (3)* ***support the effective use of rooftops*** *and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.'* (emphasis added).

The importance of the role that the digital sector plays in economic growth is further recognised in paragraph 6.8.3 stating that it *'supports the growth and evolution of all sectors in the economy…….The Mayor will support the growth of the tech and digital sector across all of London'.*

Policy SI 6, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing EE and H3G to provide continued and enhanced coverage to the surrounding area.

London Infrastructure Delivery Plan 2050 (published 2014)

As part of the work on the 2015 London Plan Alterations, the Mayor commissioned work to develop a long-term infrastructure investment plan for London, and in 2014 the 'London Infrastructure Delivery Plan 2050' was published. The stated aim of the Infrastructure Delivery Plan is to provide for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan, Digital Connectivity, indicates how the Mayor's Office will support a mix of technologies including 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. EE and H3G are currently in the process of successfully rolling-out 5G within London. Deployment of the proposed base station will also contribute to London's agenda for reliable high-speed communications as it has been designed to incorporate emerging and future technologies. Among other matters the Delivery Plan stated:

"Broadband is now considered the fourth utility. The Government has stated that it wants 99% of the population to have superfast connections by 2018. Internet access speeds and coverage affect the productivity of businesses and are now a factor considered by homebuyers. Access is not only essential to many businesses, but also, as more local authorities are encouraged to move the services they provide online, access is essential for residents to be able to take part in a modern society. The Mayor wants

every resident and business in London to be able to have affordable high-speed internet connectivity, should they choose to access it".

An existing site is required to be decommissioned for reasons beyond the Operator's control and it is imperative that replacement coverage and capacity is provided in this particular area of London in line with the expressed aims of the London Mayor's office and Government. This proposal seeks, individually, to provide enhanced and continuation of services to remedy this matter wholescale.

Raising London's High-Speed Connectivity to World Class Levels

The Mayor's report: *'Raising London's High-Speed Connectivity to World Class Levels'* provides the background to and amplifies Chapter 16, Digital Connectivity, of his Infrastructure Delivery Plan. The report notes, the availability of 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 report also notes among other matters, that:

"Mobile operators already experience difficulty obtaining permission from local authorities…to increase capacity for their networks in areas where there is high demand. The Mayor, therefore, will be working 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".

As a last resort and having regard to the strategic importance of London Plan Policy 4.11, the report states:

"The Mayor has overall strategic responsibility for planning in London…The communications network of London is clearly one of strategic importance. Should the implementation of the London Plan across strategic agencies not provide the adequate flexibility for the development of a robust communications network, whether based on existing technologies or future ones, the Mayor will seek to bring planning applications for communications infrastructure within this strategic responsibility, with the ability to take them over for his own determination…"

Barnet's Local Plan Development Plan Document (September 2012)

Most relevant to the proposal is Policy DM18: Telecommunications – This policy sets out the criteria where telecommunications equipment would be permitted. The proposal complies with this policy as the equipment would be located on an existing building and entails operators sharing a site. It is considered that the design is appropriate and in keeping with the surrounding area and will not have an adverse impact on the surrounding area. Furthermore, care has been taken to site the equipment at one end of the building so as not to detract from the host building.

It is considered the proposed development complies with the above policies and no conflict with any other aspect of the plan has been identified.

Overall, it is considered the proposal complies with both national and local policy. The proposal is sympathetically designed, it would enhance the provision of local community facilities and services and would protect visual amenity.

Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for a continued and improved quality of service.

The specific requirement of the operators in this instance is to provide replacement connectivity and network enhancement to the area, with a minimal impact. This site achieves this aim. The proposed development is compliant with the NPPF. This siting and design is considered the most appropriate solution to providing the coverage requirements to the area.

The changes to the proposed development, compared to the previously approved development, are not significant, therefore this application is acceptable, as was confirmed with the appeal decision for the first application on the site.

The proposal is fully compliant with ICNIRP guidelines.

Confirmation that submitted drawings have been checked for accuracy

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