

**SUPPLEMENTARY INFORMATION**

**1. Site Details**

Site Name:	Land At Byng Place	Site Address:	Land At Byng Place
National Grid Reference:	529759, 182129		Opposite St Marks Church London WC1E 7HU
Site Ref Number:	CTIL_147951	Site Type: <sup>1</sup>	Macro

**2. Pre Application Check List**

**Site Selection**

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
WHP called the planning policy team on 18/08/15 requesting access to the LPA mast register and were told that this information was not available.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

**Annual Area Wide Information to local planning authority**

Date of information submission to local planning authority	13/10/2015
Name of Contact:	Neil Storer, Gavin Polkinghorn.
Summary of any issues raised:	Strategic level pre-rollout meetings are held with the LPA to discuss the necessities of the project, benefits and best practice going forward.

**Pre-application consultation with local planning authority**

Date of written offer of pre-application consultation:	04/12/2016
Was there pre-application contact:	Yes <b>No</b>
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised:	
To date no comments have been received.	

<sup>1</sup> Macro or Micro

## Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	<b>Green</b>
<p>Outline of consultation carried out:</p> <p>Prior to the submission of this application the applicant initiated pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues.</p> <p>No comments were received in respect to the consultation submitted at the time of submission.</p> <p>Further consultation with the local Ward Councillors (Rishi Madlani, Sabrina Francis, Adam Harrison). Letters sent 04/12/2015.</p>			
<p>Summary of outcome/main issues raised:</p> <p>No responses had been received from any of the Ward Councillors at the time of submission</p>			

## School/College

<p>Location of site in relation to school/college:</p> <p>There are vno schools in close proximity as defined by the serach criteria outlined in the CoBP.</p>
<p>Outline of consultation carried out with school/college:</p> <p>N/A.</p>
<p>Summary of outcome/main issues raised:</p> <p>N/A.</p>

## Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/A		

## Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	21/01/2016	

### 3. Proposed Development

#### The proposed site:

The proposed site is situated on the paved footpath on the south side of Byng Place adjacent to an access route in to the University of London Union building and approximately 45m to the east of the junction with Malet Street. The site is well screened by the surrounding tall university buildings and has been sensitively sited set against a backdrop of commercial development so as not to harm the setting of the Church of Christ the King.

The proposal is for the installation of a new 12.5m Jupiter Dual Stack Streetpole on a new root foundation that will provide new coverage for both Vodafone and Telefonica. The proposed new facility will require the installation of 3 no. new small scale cabinets at ground level and in close proximity to the base of the pole.

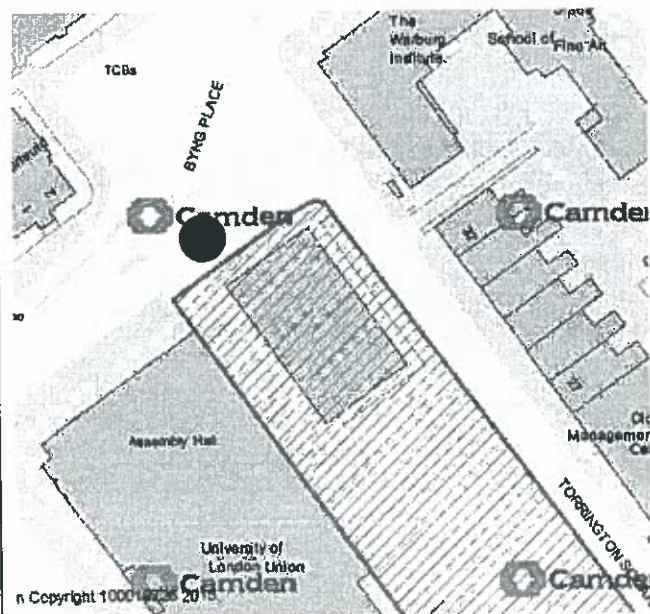
The site has been carefully selected in a partially screened position, adjacent to a large modern university building so as to provide the required new coverage to the area whilst minimising visual intrusion within the conservation area and for residential receptors. The Jupiter streetworks style design has been specified in order to allow the proposal to merge with the numerous vertical elements of street furniture, including street lighting columns (approx. 8m in height) distributed around the vicinity of the site.

Site Ref (CTIL LONDON):	147951	Site Address:	Land at Byng Place, Camden, London, WC1E 7HU
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Local Planning Authority: LB Camden

Development Plan: LB Camden LDF Core Strategy DPD / LB Camden LDF  
Development Policies DPD

**Fig.1 – Local Plan Map (extract – reference only)**



Site and its surrounds

**Policy Relevant to the Development Site:**

The site is designated as being in the settlement boundary, with urban uses to the north, east, south and west. The site is in the Bloomsbury Conservation Area and the land designation that this site is located in is deemed to be a material consideration.

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

**Policy Analysis:**

Policy **DP25** states that:

In order to maintain the character of Camden's conservation areas, the Council will:

- a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
- b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
- d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
- e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage..

The proposed works would not be to the detriment of the surrounding area (it would preserve the character of the Conservation Area and not cause harm to the setting of nearby Listed Buildings), but is necessary to ensure improved delivery of service, and would respect and continue to maintain the appearance of the area, so according with the principles of the policy.

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



Enclose map showing the cell centre and adjoining cells:



Type of Structure (e.g. tower, mast, etc):

Description:

Installation of 12.5m Jupiter Dual Stack Monopole supporting 6 no. VF / TEF antennas.

Installation of 1 no. TEF Alifabs Lancaster equipment cabinet (1898 x 798 x 1650)

Installation of 2 no. VF Ericsson RBS6102 equipment cabinet (1300 x 700 x 1450)

Installation of 1 no. VF / TEF Slimline meter cabinet (655 x 260 x 1015)

Overall Height: 12.5m

Height of existing building (where applicable):

N/A

Equipment Housing:

Length:

See above

Width:

See above

Height:

See above

Materials (as applicable):

Tower/mast etc – type of material and external colour:

Finished in black.

Equipment housing – type of material and external colour:

Finished in black.

Reasons for choice of design:

Vodafone Limited and Telefonica UK Limited (commonly known as O2) have entered into a new agreement in which the two companies plan to jointly operate and manage a single network grid across the UK. This initiative strengthens the network infrastructure partnership

between the two companies, previously rolled out as part of 'Cornerstone'. The single grid infrastructure overhauled planned by CTIL will enable both organisations to pool and consolidate their respective networks while running two, independent, nationwide networks. Each operator will keep ownership and control of its network spectrum, however as part of CTIL it will mean each operator will have responsibility to manage, maintain and provide coverage in one half of the UK.

Technological advances and the Cornerstone agreement has enabled a mast share structure that breaks the barriers of conventional mast share schemes which in the past have typically involved tall heights due to the separation needed between sets of stacked antennas and or large exposed antenna head-frames. The overall height of the proposed monopole at 12.5 metres has been kept to its technical minimum given the structure types which are available to the aforementioned operators. The choice of monopole with shrouded antenna to a top height of 12.5m has been dictated by the need to accommodate two operators with all antennas housed within a single facility whilst providing improved coverage. Vodafone Ltd and Telefonica UK Ltd have specified an overall top height of 12.5m as it is the minimum height that will provide the required coverage within the designated search area.

The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. Telefónica UK Limited has entered into an agreement with Vodafone Limited pursuant to which the two companies plan to jointly operate and manage a single network grid across the UK. These arrangements will be overseen by Cornerstone Telecommunications Infrastructure Ltd (CTIL) which is a joint venture company owned by Telefónica UK Limited and Vodafone Limited.

Central Government attaches great importance to the design of the built environment and outlines this within Section 7 (para. 56) of the National Planning Policy Framework. It states:

*"Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people".*

In keeping with the National Planning Policy Framework (NPPF) guidelines of using: "high quality communications infrastructure", the proposed T-Range replica telegraph pole design has been selected to minimise visual impact by merging with the numerous vertical elements of street furniture distributed around the vicinity of the site.

As stated above the National Planning Policy Framework advocates site sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.

4. Technical Information

	Yes	No
<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)*</p> <p>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.</p> <p>When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, Telefonica operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.</p> <p>As part of Telefonica's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>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.</p> <p>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.</p>		

## 5. Technical Justification

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

The site is required to provide enhanced 2G, 3G and 4G coverage for both operators, both low band and high band. This will improve coverage in the WC1E area. The cell search areas for 3G and 4G are extremely constrained with a typical cell radius of approximately 250m meaning that it would not be feasible to site the column outside of this locale.

The development of this dual utilisation site will eliminate the need to build two separate ground based installations thereby complying with national and local planning policies which encourage the sharing of telecommunications facilities.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information on Radio Network Development for Planning Applications'. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.

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

### Why we need a site in the street environment:

Operators are committed to provide coverage and improve capacity. Operators' need for a new base station derives from a sequential approach to a site selection process:

1. Upgrading an operator's own existing base station(s);
2. Using existing telecommunications structures belonging to another code system operator, i.e. mast sharing;
3. Co-location or site sharing alongside existing telecommunications development;
4. Installing a base station on an existing building or tall structure.

If 1-4 unavailable, the only viable option is:

5. Erection of a new ground based mast in street environment.

A new SW site has been proposed as there are no telecoms installations within the search area available for upgrading in this predominantly residential area. The Jupiter Dual Stack Streetpole has been specified in order to provide the best compromise between height, coverage and minimising visual intrusion by merging with the surrounding vertical elements of street furniture.

Vodafone and Telefonica UK Ltd have specified 12.5m as the minimum height that can provide the required coverage to the area within a single-shared facility. The proposal requires a single small scale cabinet to be installed in close proximity to the base in order to house the associated ancillary radio and metering equipment.



**Planning considerations:**

No relevant planning telecommunication planning applications found within the immediate vicinity of the site.

As part of the rigorous preparation involved in resubmitting an improved, alternative design solution, the search area has been revisited and despite extensive investigations into alternative locations, no viable alternative options have been identified. A detailed breakdown of these discounted options has been provided in section 6 below.

Site	Site Name and address	National Grid Reference	Reason for not choosing
RT	University of Central London Gower Street London WC1E 6BT	529579 182295	Despite a great deal of effort we have not been able to encourage the University to deal. We have provided photos of carefully shrouded schemes etc. but they are not interested. They own all property in the search area, with the exception of the church hence the limited number of discounted options.
RT	Chapel of Christ the King Gordon Sq London WC1H 0AL	529722 182163	The Landlord has no interest in the proposal
RT	85 Tottenham Court Road London W1T 4DU	529460 181925	Spyder offered site but it is outside of the search area, and the LL has confirmed that it is no longer available.
RT	Goodge Street Station 72 Tottenham Court Road London W1T 2HF	529515 181830	Spyder offered site but it is outside of the search area, and the LL has confirmed that it is no longer available.

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

N/A

Land use planning designations:

The site is designated as being in the settlement boundary, with urban uses to the north, east, south and west. The site is in the Bloomsbury Conservation Area and the land designation that this site is located in is deemed to be a material consideration.

Additional relevant information (planning policy and material considerations):

This specific proposal forms part of an integral requirement for 02 and Vodafone to expand their respective telecommunications network across London specifically in this instance to enhance coverage levels and network capacity within the WC1E area.

Telefónica O2 UK Limited has entered into a network sharing agreement with Vodafone Limited pursuant to which the two companies plan to share network equipment on a number of sites across the UK. A joint project team has been created, called CTIL comprising Vodafone and O2 employees, to oversee these arrangements. This agreement allows both organisations to consolidate the number of base stations required through sharing which is in accordance with Government Policy, and therefore significantly reduce the environmental impact of network development

This partnership has resulted in the development and production of an array of "dual user" structures and cabinets, which have the ability to accommodate both operator's antenna systems and radio equipment.

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

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

#### **DEVELOPMENT PLAN POLICY.**

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

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

#### **NATIONAL PLANNING POLICY**

The 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. Part 5 of NPPF sets out the Government's planning policies on electronic communication infrastructure and how these are expected to be applied.

It is clear that the proposed works fully adhere to national guidance on telecommunications development. The works proposed for this site will ensure that residents and businesses within this area of Camden will continue to be serviced by the latest telecommunications technology. In accordance with the provisions of paragraph 43, the applicant aims to keep the amount of new telecommunications sites in the area to minimum by proposing a new based station shared by two operators. As detailed above, extensive consultation has been carried out with local stakeholders prior to the submission of this application, and an ICNIRP certificate of compliance is included with this submission.

#### **LOCAL PLAN POLICY**

The relevant Local Plan policies (London Borough of Camden LDF Core Strategy DPD / LB Camden LDF Development Policies DPD) have already been highlighted in this planning statement. It is worth stating that this scheme seeks to ensure the scale and mass of the design is such that it is sympathetic to its surrounds (street lighting columns) and the proposed works would not be to the detriment of the surrounding area (it would preserve the character of the Conservation Area and not cause harm to the setting of nearby Listed Buildings), but is necessary to ensure improved delivery of service, and would respect and continue to maintain the appearance of the area, so according with the principles of the policy.

In accordance with Policy DP25's requirement that telecommunications developments within Conservation Areas must preserve and enhance the character and appearance of the area, the site has been carefully selected in a partially screened position in front of a modern university buildings. This aspect of the design and siting set against a backdrop of large scale commercial development will also serve to enhance screening effects due to the high rooflines of the surrounding buildings. The Jupiter streetworks design has also been specified in order to allow the facility to merge with the numerous street lighting columns distributed around the vicinity of the site.

### **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. In Paragraphs 1.38-1.41 'Ensuring the infrastructure to support growth', the London Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that the city requires to secure its long-term growth. Such matters are further echoed by the Mayor's Offices long term strategy as documented in the London Infrastructure Plan 2050. It is considered that the Vodafone and Telefónica 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 4.11 'Encouraging a Connected Economy' of the London Plan. Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform in allowing Vodafone and Telefónica to provide additional 2G, 3G and 4G coverage to the surrounding 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.

The Vodafone and Telefónica networks are integral elements 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 shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

**Conclusion**

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

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

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

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of the National Planning Policy Framework, London Plan and the Council's Local Plan Policies.

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Signed:	_____	Date:	27/01/2016
Position:	Principal Planner	Company:	WHP Wilkinson Helsby
		(on behalf of CTIL and above operator)	_____