

## SUPPLEMENTARY INFORMATION

### 1. Site Details

Site Name:	1-24 Riverside	Site Address:	1-24 Riverside Birkenhead Street London, WC1H 8BH
NGR:	E530403 N182869		
Site Ref Number:	66366	Site Type: <sup>1</sup>	Macro

### Background

In April 2010 T-Mobile UK and Orange UK merged to form a 50:50 joint-venture company 'Everything Everywhere', currently trading as EE Ltd. EE is Ofcom licensed to operate GSM (Global Systems for Mobile Communications), UMTS (Universal Mobile Telecommunications System) and LTE (Long Term Evolution) in the United Kingdom for the delivery of Second (2G), Third (3G) and Fourth Generation (4G) electronic communications services. In accordance with government policy for the sharing of base stations and keeping the number of base stations to the minimum number compatible with network development, Hutchison 3G Limited (trading as 3) is also sharing the EE network under the MBNL agreement and is Ofcom licensed to operate 3G and 4G networks in the UK.

EE and H3G have radio base stations at No. 1 Euston Road, London (cell reference 50050) providing network coverage to the surrounding area. The landlord has served the operators with a Notice to Quit requiring them to remove their equipment from the site. Consequently, the operators now require a replacement site to maintain coverage in this area once their equipment at No. 1 Euston Road has been removed to ensure there is no loss of coverage.

An alternative location has been identified at 1-24 Riverside, Birkenhead Street, London, WC1H 8BH to provide replacement coverage to the area. In accordance with government guidance, the proposal uses an existing building eliminating the need for a ground mast, thereby minimising environmental impact.

### 2. Pre Application Check List

#### Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	<b>Yes</b>	No
If no explain why:		
Local authority planning records were examined.		
Was the industry site database checked for suitable sites by the operator:	<b>Yes</b>	No

#### Pre-application consultation with LPA

Was there pre-application contact:	<b>Yes/No</b>
Date of pre-application contact:	06/03/2017
Name of contact:	Chief Planning Officer

<sup>1</sup> Macro or Micro

Summary of outcome/Main issues raised:

A description of the proposal, along with a set of drawings were issued to the local authority for comments.

The LPA advised that a fee was required for pre-application advice. However, when balancing the fees of the LPA for informal advice, together with those incurred for a formal determination, it was decided that the application should be progressed to seek the LPA's formal determination.

### Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green	<b>Amber</b>	Red
Outline Consultation carried out:			
The site and proposed works were assessed against the traffic light model contained within the Code of Best Practice on Mobile Network Development (2013) prior to consultations being undertaken. An amber rating was assigned.			
The following parties were notified of the proposal on 6 March 2017;			
<ul style="list-style-type: none"><li>- Kings Cross Ward Councillors<ul style="list-style-type: none"><li>• Councillor Adul Hai</li><li>• Councillor Sarah Hayward</li><li>• Councillor Jonathan Simpson</li></ul></li><li>- Keir Starmer MP for Holborn and St Pancras Constituency</li></ul>			
Summary of outcome/Main issues raised:			
To date no response has been received.			

### School/College

Location of site in relation to school/college:		
Argyle Primary School, Tonbridge Street, London, WC1H 9EG is located approximately 160 metres from the application site.		
Outline of consultation carried out with school/college:		
The Head teacher and Chair of School Governors of the above school were notified of the proposal on 6 March 2017.		
Summary of outcome/Main issues raised:		
To date no response has 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	<b>No</b>
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	<b>No</b>
Details of response: N/A		

## Developer's Notice

Copy of Developer's Notice enclosed?	<b>Yes</b>	No
Date served:	14/08/2017	

### 3. Proposed Development

#### The proposed site:

The application site is located on the roof of 1-24 Riverside, a six storey flatted development situated at the junction of Birkenhead Street and St Chad's Street. The building is part of the Birkenhead Street Estate. It is approximately 18 metres high with a flat roof and has a plant room on the north eastern section of the roof where other rooftop structures are located. The proposal site is situated within King's Cross St Pancras Conservation Area. Below is a photograph of the subject building.



View of 1-24 Riverside from the Junction of Birkenhead Street and St Chad's Street



Photos of relevant sections of the roof

The surrounding area generally consists of a mix of residential and commercial uses although immediate land uses are predominately residential.

Enclose map showing the cell centre and adjoining cells:

The coverage plots attached show the cell centre and neighbouring cells.

Type of Structure: Rooftop installation

Description:

The proposal involves the installation of 6no. antennas, 4no. 600mm diameter dishes, 3no. equipment cabinets plus 2no. meter cabinets and development ancillary thereto.

2 antennas and 1 dish will be mounted on a 5m support pole and fixed to the plant room wall in the northeast corner. A further 2 antennas and 1 dish will be mounted on a 5m support pole and fixed to the plant room in the northwest corner. The remaining 2 antennas and 1 dish will be mounted on a 5m support pole and fixed to the plant room wall in the southeast corner. 1 dish will be installed on a free standing support pole on the roof of the plant room. The cabinets will be installed on the main roof south of the plantroom.

Overall Height:	N/A
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Equipment Housing: FURO

Length:	0.75 m
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Width:	0.6 m
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Height:	2.1 m
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Equipment Housing: 3900A SBS

Length:	0.6 m
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Width:	0.48 m
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Height:	1.6 m
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Equipment Housing: SAMO

Length:	0.75 m
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Width:	0.55 m
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Height:	2.1 m
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Equipment Housing: 2no. Link AC MK4 (meter cabinets) 1No. at ground level & 1No. on rooftop grillage

Length:	0.5 m
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Width:	0.6 m
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Height:	1.24 m
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Materials:

Tower/mast etc – type of material and external colour:	Antenna and dish support poles - Galvanised steel
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Equipment housing – type of material and external colour:	Galvanised steel/grey
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Reasons for choice of design:

In this instance, the choice of design has been influenced by the technical requirement to provide replacement coverage to this area for EE and H3G whilst ensuring the impact on the building and surrounding area is minimised.

The extent of development has been kept to the minimum possible to reduce the visual effect of the installation. The overall height of the antennas is the lowest required to achieve the technical objective of the site. The antennas are required to transmit the necessary radio signals. The dishes are necessary to provide the site with a link into the network. Their size at 600mm each has been limited to the minimum required for operational efficiency.

The height to the top of the antennas will be 24.25m AGL. The height of the plant room is 22m AGL. The antennas will be about 2.25m higher than the plant room. The relatively small difference in the height of the antennas and plant room will not detract from the character and appearance of the building and conservation area given the presence of other rooftop paraphernalia and the height of the building.

The proposed antenna height is necessary to clear surrounding clutter to allow for the effective propagation of radio signals to the intended area to maximise coverage from the site and to achieve a connection into the network via the dishes. The height is also required to ensure ICNIRP compliance across the roof in relation to the antennas on the south eastern section of the plant room which will transmit signals over the roof. A lower height would cause ICNIRP issues and would impact on the coverage provided from the site to the extent the operators may need to develop a further base station in the area to achieve the required replacement coverage. This would be inconsistent with government guidance, as set out in National Planning Policy Guidance (NPPF), which seeks to keep the numbers of base station sites to the minimum.

The proposed equipment cabinets measure less than 2.5m<sup>3</sup> each and will be located on the main roof south of the plant room. They will enable the required signals to be generated from the site. The cabinets will have a grey finish and their siting near the plant room, away from the roof edge will further minimise visual impact. The plant room will screen and provide a backdrop for the cabinets in high level views. They will not be noticeable in street views.

On balance, it is felt that the proposed design will not detract from the character of the building and will not have a detrimental impact on the visual amenity of the area or character and appearance of the conservation area.

**4. Technical Information**

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)*	<b>Yes</b>	<b>No</b>
<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. In order to minimise interference within its own network and with other radio networks, EE and H3G operate their networks 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 EE's 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</p>		

<p>radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.</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>		
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**5. Technical Justification**

**Enclose predictive coverage plots**

<p><b>Reason(s) why site required e.g. coverage, upgrade, capacity (map attached if required):</b></p> <p>The primary purpose of the proposed base station is to provide replacement network coverage to the area on the EE and H3G networks following the removal of the existing base station at No. 1 Euston Road. The replacement site will also provide new 4G coverage to the area on both networks.</p> <p>The installation will provide 2G, 3G and 4G coverage on the EE network and 3G and 4G coverage on the H3G network.</p> <p>The coverage plots provided illustrate the radio requirement in the area and show the predicted coverage that will be achieved by the replacement site. Only 3G plots are provided as 3G, UMTS transmissions in the 2100MHz cellular band are at a much higher frequency and consequently the coverage area for these higher frequency transmissions is much less than for the lower 2G and 4G frequency transmissions. The penetration of 3G into buildings is also much less and these signals are much more susceptible to severe attenuation by buildings and other ‘clutter’ than are 2G and 4G transmissions. Therefore, if the predictive RF coverage plots for 3G are acceptable to the radio planner then 2G and 4G RF coverage will also be acceptable.</p> <p>The loss of the site at No.1 Euston Road would significantly impact on coverage in the surrounding area particularly the area to the south east and north west of King’s Cross station. The proposed replacement site would maintain and improve coverage in the area.</p> <p>The importance of mobile technology in the UK, and its contribution to the sustainability agenda is emphasised in a series of annual communication market reports published by OFCOM, ‘The Communications Market (<a href="https://www.ofcom.org.uk/data/assets/pdf_file/0024/26826/cmr_uk_2016.pdf">https://www.ofcom.org.uk/data/assets/pdf_file/0024/26826/cmr_uk_2016.pdf</a>). The 2016 report states: <i>‘The communications market plays a crucial role in the lives of citizens and consumers, and the fast-paced nature of the market means that this role is ever-changing. We all need high-quality communications. In the modern world, a huge amount of our time is spent using communications services: for work, to stay in touch with family and friends, and in order to go about our daily lives. Our ability to access and use reliable mobile and broadband connections has become fundamental to the way we work and live, and to the ability of businesses of all sizes to thrive. For many people, internet connectivity is now as essential as gas or electricity, and access to traditional television, radio, fixed phone lines and postal services continue to remain important.</i></p>
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*4G take-up has increased to 48% of UK adults (from 30% in 2015) while 4G mobile services are now available to 97.8% of UK premises. And 37% of fixed broadband connections are providing actual speeds of 30Mbit/s or more, up from 30% in 2014. In total, 86% of UK adults now have internet access at home. The greater choice of where and how to access the internet is driving greater use of online services. The smartphone, in particular, is becoming an ever more important device for many consumers, and take-up of this device has increased again this year. Seventy-one per cent of all adults now own a smartphone, up from 66% in 2015.*

*The growth of 4G has been rapid. 4G mobile services are now available to 97.8% of UK premises (outdoor coverage from at least one operator) in June 2016. 4G accounted for almost half of all mobile subscriptions (46%, 39.5 million connections) in Q4 2015, compared to 28%, 23.6 million, in 2014.'*

In this respect, the network infrastructure development progressed by the operators is largely determined by consumer demand. Driven by this demand and by the governments recognition of the vital importance of mobile connectivity for residents and local economies, and indeed the country's economy, the UK's mobile operators are also obligated by their Ofcom licence agreements to provide LTE coverage to most of the country by the end of 2017. The proposed site will contribute to meeting this objective by ensuring continued connectivity and access to the very latest technologies for EE and H3G service users.

The benefits to commerce, industry and the public in general are well recognised. It is apparent that the replacement installation will provide a high standard of coverage to customers in the surrounding area.

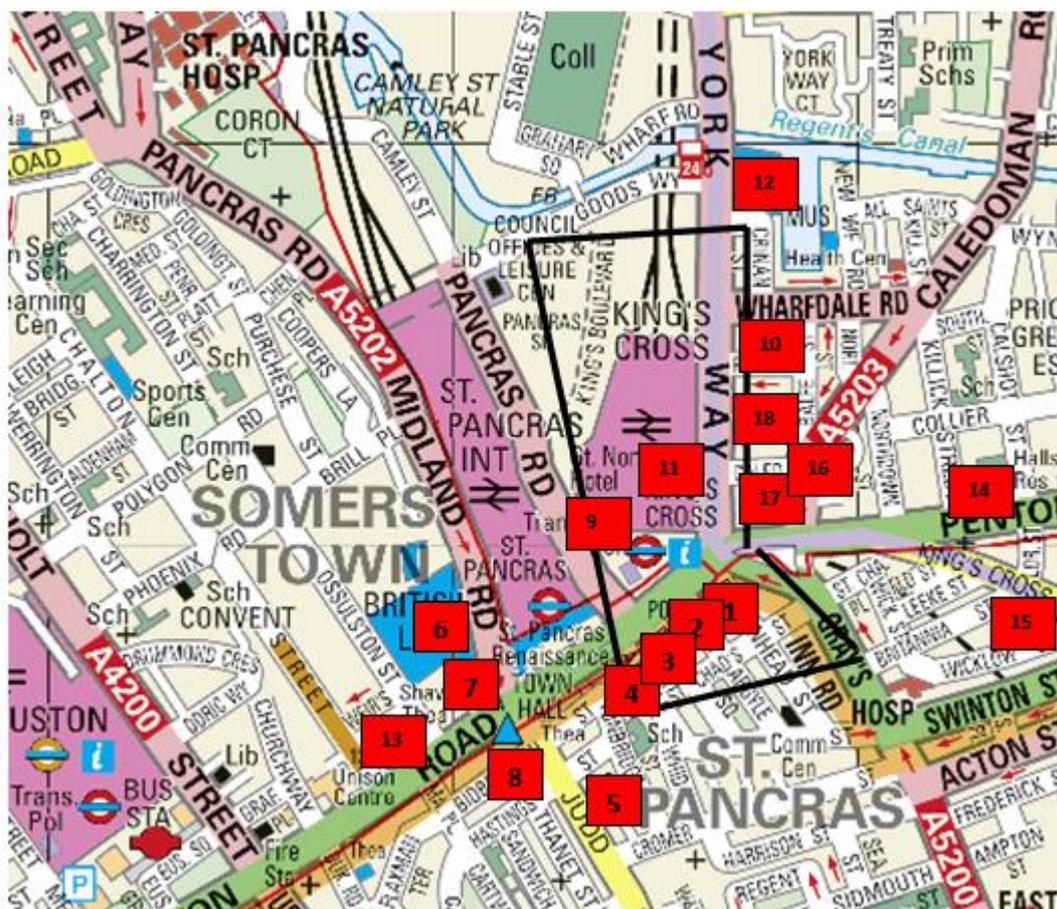
## **6. Site Selection Process – Alternative sites considered and not chosen (not generally required for upgrades/alterations to existing sites including redevelopment of an existing site to facilitate an upgrade or sharing with another operator).**

Because base stations are relatively low powered devices, they can only cover a limited geographical area. The area each base station covers is called a cell. In heavily built-up areas, for example, a small base station might cover a cell area of only a few hundred meters. Each base station can also only handle a limited number of calls at one time (this is referred to as the "capacity" of the cell or network). Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings and trees, which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service.

The search area in which a site must be found is determined to ensure effective transmission coverage is provided within the target area. Site placement is critical in network planning and locations are selected to fit as closely as possible to the cellular pattern necessary for the area, with the result that this reduces both the interference generated and the overall number of sites required, whilst ensuring effective coverage. Ideally, sites should be located within the designated search area to limit interference with adjacent cells and to maximise coverage and minimise the number of sites. In this case, the proposal site is required to provide replacement coverage following the removal of the operators' equipment at No. 1 Euston Road therefore it is important that it is located as close as is technically possible to the NTQ site to replicate the levels of coverage from it. These technical considerations have formed a fundamental part of the site selection process for this cell.

Prior to selecting the application site, a comprehensive investigation was undertaken by the Applicant's network planners, acquisition and planning agents. Sites were considered in terms of their technical suitability to provide the required level of service, the effect on visual amenity and their ability to be acquired, built and maintained. The aim of site identification is to find the most technically efficient site, which has the minimum impact on visual amenity.

The map below shows the designated search area (black polygon) in which a site should be found to achieve the required replacement coverage. It also shows alternative siting options considered in the area.



The designated search area is centred around King's Cross station and falls within the boroughs of Camden and Islington. The station occupies a large chunk of the search area. The area is generally commercial in nature with some residential flats in converted period buildings with ground floor commercial uses and numerous hotels. The entire search area is within either King's Cross Conservation Area or Bloomsbury Conservation Area.

Several options were considered in the area and have been discounted for the reasons set out below. There are no existing telecommunications installations to share. The proposal site, which utilises an existing building, is the optimum available option that will achieve the coverage objective with minimum impact on the area. The installation will be shareable and eliminates the use of a ground based mast which is a less preferable solution from an environmental perspective.

Below is a list of alternative sites considered and not chosen.

Site	Site Name and address	Indicative NGR	Reason for not choosing
1	Carlton Hotel, Birkenhead Street, WC1H 8BA	E530349 N182960	The pitched nature of the roof is not suitable for a telecommunications installation.
2	Kings Cross Inn, 9-11 Euston Road NW1 2SA	E530305 N182931	The landlord is not interested in accommodating the proposed equipment on their property.
3	Access Self Storage, Belgrave House, Euston Road WC1H 8AA	E530285 N182919	The landlord has a policy that does not permit telecommunications apparatus on their property.

4	Hotel Megaro, Belgrove Street WC1H 8AB	E530274 N182893	Despite several approaches to the landlord, no response was received. The operators cannot compel a response from the landlord and the need for a site remains. Without the landlord's permission to develop the land, this option could not be pursued.
5	Clare Court, Judd Street WC1H 9QW	E530160 N182714	Discounted as option is located too far south west of the cell centre and would therefore not provide the required level of coverage to the target area.
6	British Library, 96 Euston Road NW1 2DB	E529980 N182889	This option is located outside the search area and would not provide the required levels of coverage to the target area due to coverage being blocked by the St Pancras station building.
7	Pullman Hotel 100 - 110 Euston Road, NW1 2AJ	E529915 N182714	This is an existing telecommunications site located outside the search area to the west. This option was discounted as it is too far removed from the search area to be capable of addressing the present coverage requirement in an effective manner.
8	Premier Inn St Pancras, 141 Euston Road NW1 2AL	E529900 N182650	Discounted as option is too far removed from the search area and will therefore not achieve the required coverage.
9	Great Northern Hotel, Pancras Road, N1C 4TB	E530173 N183034	The landlord was approached to ascertain interest in locating the proposed equipment on their property however, no response was received. The operators cannot compel a response from the landlord, and the need for a site remains. Without the landlord's permission to develop the land, this option could not be pursued.
10	42-50 York Way N1 9AB	E530362 N183283	The owners are not interested in accommodating telecommunications apparatus on their property.
11	Kings Cross Station, Euston Road	E530245 N183078	The design of the building is not suitable for a telecommunications installation. In addition, it is too low and would not achieve the coverage objective.
12	York Central, 70-78 York Way N1 9AA	E530365 N183444	This option was discounted as it is located too far north of the designated search area and would therefore not achieve the required replacement coverage.
13	Evergreen House, 160 Euston Road NW1 2DX	E529788 N182647	Discounted as this option is located too far west of the target area to be capable of addressing the present coverage requirement in an effective manner.
14	Nido, 200 Pentonville Rd, N1 9JP	E530752 N183080	Discounted as this option is located too far east of the target area and therefore will not effectively address the present replacement coverage requirement.
15	Paul Robeson House, 1 Penton Rise WC1X 9EH	E530925 N183034	Same as above.
16	302-304 Pentonville Road N1 9XD	E530348 N183026	The landlord was approached to ascertain interest in locating the proposed equipment on their property however, no response was received. The operators cannot compel a response from the landlord, and the need for a site remains. Without the landlord's permission to develop the land, this option could not be pursued.
17	Bravington House, Regents Quarter, London, N1 9AF	E530366 N183039	There is insufficient space available on the roof to implement the proposal. In addition, the location of this option outside of the search area parameter would mean that this specific coverage requirement could not

			be addressed as effectively as it could by using the subject solution.
18	Premiere Inn, 26-30 York Way, London N1 9AA	E530355 N183127	The location of this option outside of the search area parameter would mean that this specific coverage requirement could not be addressed as effectively as it could by using the subject solution.

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

N/A

Additional relevant information:

It should be highlighted that any comments made in this section assessing the proposal against either national or local planning policies should be read in conjunction with the information contained within preceding sections of this statement. It is considered that the planning assessment of this case should concentrate on whether the visual impact of the proposed scheme is significant as to outweigh other material planning matters.

### **National Planning Policy**

#### **National Planning Policy Framework (2012) (NPPF)**

Paragraph 21 advises LPA's to '*plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;*' and paragraph 29 recognises that '*Smarter use of technologies can reduce the need to travel.*' The proposed development will enable the operators to provide and maintain high quality reliable coverage to the surrounding area, forming part of a network of high technology for the operators. The proposal will provide 3G and 4G coverage allowing for home working and a potential reduction in the need to travel, thus contributing to the government's sustainability agenda.

Section 5 of the NPPF addresses supporting high quality communications infrastructure. Paragraph 42 sets out 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.*' It sets out that high speed broadband and other communications networks, such as the proposal and its role in EE's and H3G's wireless data network, play a vital role in enhancing the provision of local community facilities and services. This main plank of government planning guidance for communications infrastructure is clearly supportive of the applicant's proposed development to maintain the quality of communications in the area at a high standard for EE and H3G users.

Paragraph 43 advises that '*local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.*'

In line with this aspect of the NPPF, the proposal which will replace an existing telecommunications facility elsewhere, utilises an existing building with other rooftop infrastructure and will accommodate apparatus for two independent operators thereby eliminating the need for additional masts/sites in the area. The proposal would allow for the technical objective to be achieved with minimum environmental impact. Visual impact has been minimised as demonstrated in part 3.

Paragraph 45 requires applications for telecommunications development to be supported by the necessary evidence to justify the proposed development. It says that this should include:

- *the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site; and*

Please refer to Community Consultation in Part 2 for details of who was consulted and the responses received.

- *for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.*

As noted previously, the proposal would be sited on the roof of a building. No other viable options are available upon which to locate the required equipment. A list of the alternative sites explored in the area is provided in Part 6. The proposal site is fully compliant with the precautionary ICNIRP guidelines.

Paragraph 46 clarifies that LPA's '*must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure.*' As noted previously in this statement there is a demonstrable operational requirement for the installation at the application site following the service of a Notice to Quit at No. 1 Euston Road. As noted above, an ICNIRP certificate is included with the application which confirms the proposal is ICNIRP compliant.

Paragraphs 126 to 141 of the NPPF contain the heritage specific policies which seek to conserve and ensure enjoyment of the historic environment. They set out how local planning authorities should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.

At paragraph 132 it states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.'...Paragraph 134 states that "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use." Paragraph 135 states that 'in weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

The application site is located within King's Cross St Pancras Conservation Area where development is expected to preserve and enhance the character of the area. The subject building is part of the Birkenhead Street Estate. As noted in the King's Cross Conservation Area statement, the seven storey blocks of the Birkenhead Street Estate are adjacent and occupy the area at the western boundary of Sub Area 4. These buildings are of no architectural or historic merit and are not identified as making a positive contribution to the special character and appearance of the area.

In Chapter 7 of the conservation area statement, the council provides general guidance on works and applications in conservation areas. They acknowledge that the increase in the number of mobile phone users is leading to an increased demand by operators for telecommunications equipment. However, it is noted that equipment placed on tall buildings could potentially be prominent in the conservation area. Therefore, the council will consider the impact such development would have on the character and appearance of the building, views into and around the area from publicly accessible locations and the effect on the roofscape. The installation of equipment to listed buildings will not generally be considered appropriate.

As previously discussed, the proposed antennas and dishes will be sited on the plant room of the building where other rooftop infrastructure exist. It is considered that the proposal will be viewed as part of the existing structures on the roof. The arrangement of the antennas in pairs with dishes attached would

reduce visual clutter as less support poles will be used than if the antennas were supported individually. The siting of the cabinets on the main roof away from the roof edge would further minimise the visual effect of the installation. While any utilitarian structure such as telecommunications equipment will detract to some degree from the visual quality of any building, it is not considered the proposal will appear incongruous in the context of the existing rooftop structures or have a serious adverse effect on the character and appearance of the building and area.

The cabinets will not be visible in street views. The antennas would be noticeable in surrounding streets particularly from Argyle Square, north east in St Chad's Street and at the junction of St Chad's Street and Gray's Inn Road (A501) however, they would not appear unduly dominant due to their limited height and small scale. In views from the west at the junction of Crestfield Street and St Chad's Street, the antennas will be viewed in conjunction with other rooftop paraphenelia on the plant room. The existing roadside trees will provide some screening from some angles in this view. From St Chad's Street, west of Argyle Square, views will be restricted by trees in Argyle Square gardens. From the south west in Argyle Square gardens, views will be restricted by intervening trees and development. When seen from the north east at the junction of Gray's Inn Road and St Chad's Place, the proposal will be viewed in conjunction with other vertical elements in the street and commercial uses in this area. Views from the north in Euston Road and south from Argyle St will be limited by intervening development. It is considered that the proposed development would not have an adverse impact on the visual outlook of the area. It should be recognised that visibility, as in this case or a development's siting and appearance, does not automatically result in overwhelming adverse harm.

The proposed installation, which will maintain and improve services for EE and H3G in the wider public good and which supports sustainable ways of working whilst minimising the impact on the surrounding area, is in complete accordance with the NPPF.

### **Local Planning Policy**

Section 70 of the Town and Country Planning Act 1990 requires planning applications 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.

The Camden development plan is made up of (together with the Mayor's London Plan) several planning documents. The key document is the Camden Local Plan 2017 which has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough. The Local Plan is supported by a series of documents forming the Camden Planning Guidance and several other documents about local and sub-regional matters.

The development plan has no policy specifically related to telecommunications development therefore the Applicant has reverted to guidance contained in the NPPF.

Other relevant Local Plan policies include Policy D1 which seeks to secure high quality design in development, Policy G1 which sets out the council's strategy for delivering growth and Policy D2 "Heritage" which requires development to preserve or enhance Conservation Areas and listed buildings. Policy D2 stipulates that the Council will not permit the loss of or substantial harm to a designated heritage asset unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

As stated previously, the proposal has been designed having regard to the characteristics of the building and the need to minimise visual impact whilst ensuring the technical objective is met. Visual impact has been minimised as far as is practicable. Policy D2 echoes guidance contained in Paragraph 134 of the NPPF. As demonstrated above, the proposal will lead to less than substantial harm to the significance of the conservation area. The location on a building is an entirely suitable one for the electronic communications infrastructure proposed. The small scale of development in relation to the host building

means the proposal will not appear out of place. It will add to existing features on the roof without being overbearing. The height of the antennas is comparable to that of the existing aerials on the plant room. The proposal will not detract from the overall appearance of the building and its roof profile. The character and appearance of the conservation area will not be harmed. The limited impact on the area that would result from the development would be outweighed by the public benefits resulting from the maintenance of an efficient high quality public infrastructure network.

Paragraph 2.6 of the Local Plan sets out key priorities for delivering growth, including *'securing the infrastructure and services to meet the needs of our growing number of residents, workers and visitors. We have identified our infrastructure needs in the schedule in Appendix 1. This includes transport, utilities, education, health, open space, emergency services needs and digital infrastructure requirements.'* Appendix 1 in turn sets out in relation to Digital Connectivity that the Council will aim for *'improved internet access through the acceleration of high speed connectivity, including public wireless systems'*, which includes the development proposed in this application. Paragraph 2.52 also recognises the need for adequate infrastructure to support growth, including digital infrastructure.

The proposal which would deliver social and economic benefits to its users is the type of development the council requires to support growth.

#### The London Plan (consolidated with alterations since 2011)

In March 2016, the Mayor formally published further alterations to the London Plan. The London Plan continues to set out the spatial development strategy for Greater London, in which it discusses the importance of ensuring that robust infrastructure is in place to support better connectivity and economic prosperity. Policy 4.11 'Encouraging a Connected Economy' and its written justification is clearly supportive of the proposal which is appropriately designed and sited. The proposal which is 3G and 4G compatible and supports sustainable ways of working will enable easy and rapid access to information and services and therefore complies with the aims of this policy.

The proposed development is precisely the type of high-speed digital infrastructure that the government is seeking to support as part of the presumption in favour of sustainable development. It will deliver social, economic, and environmental benefits by providing 3G and 4G services to the residents, businesses and services in this area of Central London.

The proposed installation is fully in accordance with relevant local planning policies.

#### **Conclusion**

The application is in respect of electronic communications apparatus necessary to maintain an existing public infrastructure network for EE and H3G following the planned removal of the base station at No.1 Euston Road.

The proposal site is the optimum available option in the area that would maintain and improve coverage in this area with minimum impact on the character of the building and surrounding area. As demonstrated in this statement, no other more suitable alternative site capable of accommodating the proposal is available in the area.

The proposal is appropriately sited on the roof of a building with other rooftop structures. The proposal will be in keeping with the building and its roof profile. The simple design and small scale of the development will ensure the development does not have an adverse impact on visual amenity and will preserve the overall character and appearance of the conservation area. It is considered that the wider public benefits that would result from the maintenance of a high quality infrastructure network are sufficient to outweigh the limited impact on the surrounding area.

An ICNIRP compliance certificate is attached as part of this submission, as required by NPPF paragraph 45.

This statement has demonstrated that the proposal is fully in accordance with National Planning Policy set out in the NPPF and the Council's Development Plan. It is a form of development that is encouraged in principle and complies with the policy objective of minimising potential environmental impact, by being shareable and located on an existing building.

On balance, the application warrants support and there are no material considerations that indicate otherwise.

### Contact Details

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		(on behalf of EE Ltd and H3G UK Ltd)	