

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Euston Square	Site Address:	Euston Square underground station, Gower Street, London WC1E 6BP
National Grid Reference:	5297431/182367		
Site Ref Number:	70733	Site Type: ¹	Cabinets only as the antennas are permitted development.

2. Pre Application Check List

Site Selection (for New Sites only)

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:		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		

Annual Area Wide Information to local planning authority

Date of information submission to local planning authority	Autumn 2017
Name of Contact:	Chief Planning Officer
Summary of any issues raised:	None

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	24/10/2017
Was there pre-application contact:	None
Date of pre-application contact:	
Name of contact:	

¹ Macro or Micro

Summary of outcome/Main issues raised: Cost of preapplication advice was too high.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: Ward Councillors Sabrina Francis, Rishi Mandlani and Adam Harrison.			
Summary of outcome/main issues raised: None			

School/College

Location of site in relation to school/college (<i>include name of school/college</i>): No schools close to the site.
Outline of consultation carried out with school/college n/a
Summary of outcome/main issues raised: n/a

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:		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	29 th November 2017	

3. Technical Information

International Commission on Non-Ionizing	Yes	
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<p>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, CTIL 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 CTIL'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</p>		
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cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		
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4. Technical Justification

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, web, TV and downloads. Without base stations, mobiles will not work. They are made up of three main elements. The cabinets which contain the equipment used to generate the radio signal. The supporting structure such as a mast, which holds the antennas in the air and the antennas themselves. Only the antennas emit radio signals.

Many other everyday items also use radio signals to send and receive information, such as television and radio broadcasting equipment and two-way radio communications. Base stations are connected to each other and telephone exchanges by cables or wireless technology such as microwave dishes, 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. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills, which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service. Each base station covers a certain area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular more base stations are needed to ensure continuous coverage.

The antennas are permitted so this application is for the **cabinet only**.

Telefónica is in the process of progressing a suitable site in the Euston Square area for small cell systems. Due to the massive demand that is now placed on base stations due to the use of smart phones and tablets there are certain areas that need enhanced capacity, therefore CTIL are looking at deploying a number of small cells to enhance areas of poor coverage. This is one such area due to the high footfall in the area and coverage not being met by adjoining sites.

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

5. Proposed Development

The proposed site:

Euston square underground station is characterised by transport hubs and commercial uses. The area has a high footfall. The building itself is not listed but is located within a conservation area. The cabinet has been carefully positioned at ground level to ensure that it does not impede pedestrian flow.

Type of Structure (e.g. tower, mast, etc):	Proposed rooftop equipment
Description:	
The installation of a ground based Hercules equipment cabinet and associated development.	
Overall Height:	n/a metres
Height of existing building (where applicable):	
Equipment Housing:	1898 x 550 x 1521 mm
Length:	
Width:	
Height:	
Materials (as applicable):	
Tower/mast etc → type of material and external colour:	n/a
Equipment housing → type of material and external colour:	Grey

Reasons for choice of design:
We are aware that the site is in a Conservation Area but the whole of the search area is. The application is for cabinets only as the antennas are permitted development.
As the site is located within a conservation area a sensitive design has been drawn up, the equipment cabinet is proposed at ground level and has been carefully positioned on a wide footpath to ensure that a pinch point is not created.

6. Site Selection Process →

If no alternative site options have been investigated, please explain why:
Due to the target area being around the underground station and the high footfall no other options have been considered as there was a willing landlord and the site could provide the required coverage
Land use planning designations (if Heritage Statement is required then include here or make reference to attached Heritage Statement):
The site is located within a Conservation Area but it is not listed.

Additional relevant information (planning policy and material considerations):

VISUAL IMPACT AND APPEARANCE

The cabinet does not present a visual intrusion in the street scene it has been positioned adjacent to the building and does not create a pinch point.

PLANNING POLICY

National Planning Policy Guidance

The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. The main thrust of the guidance is a presumption in favour of sustainable development. In general terms in respect of telecommunications the guidance aims to promote sustainable transport (including the need to travel), build a strong and competitive economy, and seeks to secure high quality design.

Specifically, the National Planning Policy Framework (NPPF) advises that advanced, high quality communications infrastructure is essential for economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services. The numbers of radio and telecommunications masts should be kept to a minimum and, where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate (paragraph 43).

In more general terms the NPPF confirms that proposals that accord with the provisions of the development plan should be approved without delay (paragraph 14). In addition a set of core planning principles are set out at paragraph 17. These principles set out (in part where relevant to this proposal) that the planning system should:

- ¶ proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;
- ¶ seek to secure high quality design and a good standard of amenity;
- ¶ support the transition to a low carbon future in a changing climate.

Significant weight is given to the need to support economic growth through the planning system (paragraph 19). The reduction in the need to travel is set out in section 4.

The National Planning Policy Framework advises specifically that local planning authorities should not seek to prevent competition between operators, and must determine applications on planning grounds (paragraph 46).

It is considered the proposed development complies with the broad aims

of the NPPF. It assists in the aim to keep the number of installations to a minimum. The equipment has been sympathetically designed and it would enhance the provision of local community facilities and services.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 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, relevant to the proposed development, comprises the London Plan 2015, the Council's Core Strategy, Development Policies document and Site Allocations document. These are discussed below:

The London Plan (July 2015)

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 Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications network, that London requires to secure its long-term growth.

It is considered that the applicants' 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 Plan, which states that:

A: The Mayor and GLA Group will, and all other strategic agencies should:

a. facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located streetbased apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive broadband access meeting the needs of enterprises and individuals.

b. support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits.

At paragraph 4.55 of the supporting written justification to policy 4.11, the

Mayor wishes to ensure sufficient ICT connectivity to enable communication and data transfer within London, and between London, the rest of the UK and globally and support ubiquitous networks – those supporting use of a range of devices to access ICT services beyond desk-based personal computers. Furthermore, at paragraph 4.57, the Mayor states the intention to support competitive choice and access to communications technology, not just in strategic business locations but more broadly for firms and residents elsewhere in inner and outer London, and to address e-exclusion amongst disadvantaged groups.

Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing Telefónica and Vodafone to provide a continued and improved range of coverage to the surrounding area.

In relation to this policy the proposal will aid in the mayors vision of connectivity and supports the outlined policy.

Local Plan

There are no policies relating directly to telecommunications development within the Council's policy documents. General policies of relevance include DP24 of the Development Policies document (Securing High Quality Design) which requires a high standard of development. Policy DP25 (Conserving Camden's Heritage) which requires development to preserve or enhance Conservation Areas and listed buildings.

It is considered the proposal complies with this policy as the design is appropriate to the location. The cabinet has been carefully positioned at street level and will not impede pedestrian flow. Therefore the development would preserve the character and appearance of the conservation area.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy the proposal is sympathetically designed, it minimises the number of installations and has a high quality of design. It would enhance the provision of local community facilities and services and would preserve heritage assets.

History of the site.

There is no history of telecoms on this site.

HEALTH & SAFETY

We would remind the Council that the Government has set out its clear view on the issue of health and perceived view of health risks in paragraph 46 of the NPPF:

Local planning authorities must determine applications on planning

grounds. They should not...determine health safeguards if the proposal meets International Commission guidelines for public exposure.”

As above, and included within this application, Telefónica UK Ltd have confirmed this installation will be fully ICNIRP compliant.

Conclusion

In relation to the above the proposal is required for the efficient operation of the network and to provide improved coverage. This site will provide high quality communications infrastructure essential for sustainable economic growth which will benefit the community / businesses and local residents. It is therefore considered taking all these factors into consideration that the proposal is the best available option and therefore complies with the aims and objectives of the NPPF.

Contact Details

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Signed:		Date:	<u>29th November 2017</u>
Position:	<u>Associate Planner</u>	Company:	<u>GVA (on behalf of CTIL and Telefónica)</u>