

other electrical equipment, air traffic services or instrumentation operated in the national interest.		
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4. Technical Justification

Coverage plots will not show the improvement in capacity.

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

In this part of Kings Cross the radio coverage falls below the levels required to provide adequate high speed indoor services in this urban area due to the fact that an existing site has to be decommissioned. Hence a new site is required in close proximity to ensure coverage levels are maintained and improved.

This site forms part of a wider plan across the area to develop and improve network coverage which will allow faster downloading and the reduction in call drop outs.

Coverage - The licence granted to CTIL demands that strict coverage qualities are met. It is essential that the benefits of mobile telephones are available for all the population. The changing customer use of mobile phones also demands that networks and coverage is available at home, in the workplace, while shopping, enjoying leisure activities or while on the move.

Quality - In order to ensure coverage within buildings such as homes, shops, offices etc. the radio signal has to be of sufficient strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, some less than 1 km apart.

Capacity - As the use of and demand for mobile phones has increased the number of sites required to provide Network capacity has increased. Each cell or base station can only handle a finite number of calls so in areas of high use additional cells are required to meet demands on the network and thus avoid existing cells going into congestion.

The radio implication of the site: Radio signals are transmitted through the network by using fixed links at such frequencies that necessitate an uninterrupted line of sight. To achieve this, the installation must reach a sufficient height above surrounding buildings and trees. The installation must also be in a position to provide good in building radio coverage to the target area.

It is for these reasons that it is important to achieve a service of quality for mobile users. The main complaints received by mobile telephone operators about their service relate to the problems associated with dropped calls and no service. As more and more people are using tablets and smart phones there is a need to ensure that existing sites can meet this demand. This is one such site as due to the location of the site there is a high level of traffic to the site and customers will be affected without the introduction of an additional site.

5. Site Selection Process

Alternative sites considered and not chosen

Site	Site name and Address	Reason for not choosing
Small cell system	Mcdonalds, 302-304 Pentonville Road, London N1 9XD 530340 /183003	Site discounted as it would not provide as much coverage to the target area.
Small cell system	Mcdonalds Belgrove House, London WC1H 8AA 530275/182913	Site is discounted in favour of the currently nominated option. Mcdonalds next to a site which has to be removed due to redevelopment of the site.
Small cell system	345 Grays INN Road, Kings Cross London WC1X 8PX 53051/182951	Site discounted in favour of the chosen option based on its location in the street.
Small cell system	23 Euston Road, Kings Cross London NW1 2SB. 530244/182882	Site discounted in favour of the chosen option based on its location in the street.
Small cell system	287-297 Pentonville Road, London N1 9NP 530373 /182983	Site discounted in favour of the chosen option based on its location in the street.

If no alternative site options have been investigated, please explain why: not applicable.

Environmental Information: The site is not located in a flood zone.

Land use planning designations: The site is located within a conservation area and Kings cross is listed.

Additional relevant information:

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that Local Planning Authorities should determine proposals in accordance with development plan policies, unless material considerations indicate otherwise. Material considerations may include, inter alia, central government guidance, High Court and Inspector's decisions etc.

The Camden Council Local Plan was adopted on 3rd July 2017. It contains no policies directly relevant to the installation of telecommunications equipment within the borough, although paragraph 5.10 **Digital Infrastructure**, in relation to **Policy E1 – Economic Development**, does state that the Council recognises the importance of digital infrastructure, including telecommunications.

In relation to **Policy E1 – Economic Development**, the proposal will allow for improved

capacity in the area, we have not provided coverage plots as these will not show the improvement. Coverage plots only show improved coverage. The improved capacity can contribute to economic development in the area, and also complies with the spirit of the NPPF. The proposal complies specifically with **Part h** of the policy by allowing for the provision of high speed digital infrastructure.

In relation to **Policy D1 – Design**, the site has been sensitively designed the antennas (which are permitted development) are mounted flush to the face of the building and are not dissimilar to burglar alarms. The cabinet is positioned so as not to impede pedestrian flow and is a common feature in the street scene. It is not considered that the proposal will impact on the conservation area or affect the setting of a listed building as the cabinet will be viewed as part of the underground entrance.

Policy D2 – Heritage the policy promotes the preservation and enhancement of the conservation area and listed buildings. The council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and listed buildings unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits.

Kings Cross / St Pancras Conservation Area appraisal was adopted in 2003 and should be considered in the context of this policy and promotes the enhancement of the area and its preservation.

In terms of these policies although it is difficult to argue that the installation of the cabinet enhances the conservation area conversely it does not blight the designation. The cabinet is viewed in the context of the entrance to the underground building and is viewed as part of this building. It is carefully positioned to ensure that it does not impede pedestrian flow.

London Plan 2017

The Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks that London requires to secure its long – term economic growth.

Paragraph 1.0.8 states "Planning for a 'smarter' city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners." The equipment provides digital connectivity which is of a public benefit to both Londoners and visitors to the area.

Paragraph 1.4.11 states "The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processed, opening up new markets and allowing more flexible working." The permanent retention of the site will ensure that the level of connectivity in the area is sufficient to meet the rising demand of reliable data and digital services by the public.

Policy SI6 – Digital connectivity infrastructure is split into 4 parts. In relation to the proposed retention of the existing temporary equipment:

- 1) The permanent retention of the site will ensure that greater digital connectivity is achieved than set out in Part R1 of the Building Regulations as the site enhances coverage as shown in the coverage plots.
- 3) The permanent retention of the site will ensure that there will be no reduction in mobile connectivity in the surrounding area as the existing level of coverage will be retained.

The site will be an integral element in securing the Mayor's vision for the delivery of modern communications networks across London.

Digital Camden

The Digital Camden document sets out Camden Council's aims and objectives with regards to the delivery of digital infrastructure in the area. The permanent retention of the site will allow for a sufficient level of coverage to be retained within the area which in turn will allow for better access to mobile technology and will allow the Council to utilise online services.

London Infrastructure Plan 2050 – Update

Chapter 8 – Digital connectivity states that digital connectivity is vital and essential for businesses and citizens to take part in modern society. The permanent retention of the site will allow for a sufficient level of connectivity to be continued within the area, thus keeping businesses and citizens at a technological advantage.

National Planning Policy Framework

In relation to this policy the National Planning Policy Framework (NPPF) has the following paragraphs which are relevant in determining this application:

Paragraph 18 "the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths and to meeting the twin challenges of global competition and of a low carbon future."

Paragraph 20 "To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century".

In relation to the above paragraphs the site will ensure improved coverage around this busy transport hub. As people now want to use phones and tablets where ever they are. The proposal is of a high design quality and does not blight the surrounding conservation area or listed buildings.

Paragraph 42, 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.

Paragraph 43 "In preparing local plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the number 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."

Paragraph 44, "Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum

distances between new telecommunications development and existing development. They should ensure that:

- they have evidence to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and
- they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and telecommunications services".

Paragraph 46, Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure.

In relation to the above the proposal is required for capacity reasons. It is considered that the proposal has been carefully assimilated in the street scene and has been carefully positioned. All other options have been carefully considered and discounted for technical reasons, operational reasons or visual prominence. Additionally it is to allow the provision of high quality communications infrastructure essential for sustainable economic growth which will benefit the community, local businesses and local residents.

An ICNIRP certificate has been submitted as part of the application confirming that the proposal complies with guidelines.

Paragraph 156 "Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, **telecommunications**, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape".

Paragraph 162. "Local planning authorities should work with other authorities and providers to:

- assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), **telecommunications**, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and
- take account of the need for strategic infrastructure including nationally significant infrastructure within their areas".

In relation to the above the site will provide improved capacity at this busy transport hub.

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

Paragraph 188, "Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre- application


discussion enables better coordination between public and private resources and improved outcomes for the community.

In terms of the above, we consulted with the ward councillors and the LPA to date no responses have been received.

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.

The proposal is required for the efficient operation of the network and to provide improved capacity. It has been considered that the proposal has been carefully assimilated in the street scene and has been carefully positioned. All other options have been carefully considered and discounted for technical reasons, operational reasons or visual prominence. Additionally it is to allow the provision of high quality communications infrastructure essential for sustainable economic growth which will benefit the community and local business. 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.

Confirmation that submitted drawings have been checked for accuracy

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