

## SUPPLEMENTARY INFORMATION

### 1. Site Details

Site Name:	Holborn Tower	Site Address:	137 – 14 High Holborn, Bloomsbury London WC1A 2BA
National Grid Reference:	530337, 181508		
Site Ref Number:	CTIL 206259/ VF1542	Site Type: <sup>1</sup>	Macro – Rooftop

### 1.1 Background

This application is proposed to infill a coverage requirement for both Vodafone Limited and Telefonica UK Limited (trading in the UK as O2) to improve their 2G, 3G and 4G coverage this area of Camden.

Vodafone Limited has entered into an agreement with Telefonica UK Limited pursuant too 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 Telefonica UK Limited and Vodafone Limited.

This agreement allows both organisations to:

- pool their basic network infrastructure, while running two, independent, nationwide networks;
- maximise opportunities to consolidate the number of base stations;
- Significantly reduce the environmental impact of network development.

The two companies therefore propose to meet this coverage requirement by utilising one installation to keep the overall impact of telecommunications development in the area to a minimum.

### 2. Pre Application Check List

#### Site Selection

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

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

<sup>1</sup> Macro or Micro

## Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	19.04.18
Name of contact:	Robert Lester
Summary of outcome/Main issues raised:  Informal advice would be that the site is located in a conservation area so care needs to be taken to ensure that any telecoms development does not clutter the roofscape and detract from the character of the area. However, based on the submitted information the existing roof of the building already contains extensive telecoms development including antennas and ancillary equipment. The proposal would appear to be commensurate with the design and scale of the existing equipment and appears to have no additional impact although this informal view is based on limited information. The impact from these other vantage points would need to be assessed at the application stage.	

## Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:  A pre-consultation letter, outlining the proposal, were sent via email to julian.fulbrook@camden.gov.uk; awale.olad@camden.gov.uk; sue.vincent@camden.gov.uk on 19.04.18			
Summary of outcome/main issues raised (include copies of relevant correspondence):  To date, no site-specific comments have been received.			

## School/College

Location of site in relation to school/college (include name of school/college):  n/a
Outline of consultation carried out with school/college (include evidence of consultation):  n/a
Summary of outcome/main issues raised (include copies of main correspondence):  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?	<del>Yes</del>	<b>No</b>
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	<del>Yes</del>	<b>No</b>
Details of response:  N/A		

**Developer's Notice**

Copy of Developer's Notice enclosed? (Notice 1)	<b>Yes</b>	<del>No</del>
Date served:	01/08/18	

### 3. Proposed Development

The proposed site:
The proposed site is located at Holborn Tower, 137-144 High Holborn Bloomsbury London WC1A 2BA
The proposal includes additional central support poles, new antennas and additional equipment cabinets along with ancillary works.

Type of Structure (e.g. tower, mast, etc):	
Description:	
The proposed site is to be located at Holborn Tower, 137-144 High Holborn Bloomsbury London WC1A 2BA	
Proposed works include additional pole supports with new antennas and new additional cabinets on the rooftop.	
Overall Height:	49 Metres
Height of existing building (to ridge level) (where applicable):	Metres
Equipment Housing: TSC Enclosure cabinet	
Length:	0.60 Metres
Width:	0.60 Metres
Height:	2.00 Metres
Equipment Housing: Flat pack rack x 3	
Length:	0.60 Metres
Width:	0.60 Metres
Height:	1.420 Metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	4 x support poles – galvanised steel to match existing
Equipment housing – type of material and external colour:	Flat pack racks / cabinets – galvanised steel frames

Reasons for choice of design, making reference to pre-application responses:
<p>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'.</p> <p>Now a newly formed joint venture company called CTIL (Cornerstone Telecommunications Infrastructure Limited) has been formed. CTIL is owned equally by the aforementioned operators allowing a single grid infrastructure with both organisations pooling and consolidating their respective networks while running two, independent, nationwide networks. Each operator will keep ownership and control of its network spectrum; however each operator will have responsibility to manage, maintain and provide coverage in one half of the UK.</p> <p>The overall height of the proposed equipment is at above 45m have been kept to its technical minimum. The top of the antennas are at a height of 49 metres so as not to compromise the centre line of the</p>

antennas and to allow for good coverage to the target area and to remain the same height as the existing antennas.

Each operator's antennas are not distinguishable as separate elements, whereby taking into account the form and appearance of proposed site as a whole, to the naked eye the mast share gives the illusion of a single operator installation (not including the existing operators equipment and other OLOs).

The choice of installing antennas on the Holborn Tower, that already accommodates telecommunications infrastructure is considered to be appropriate as it would minimise the visual impact of the development within the locality and is in line with planning policy outlined in Local planning and the NPPF 2012 policies. In light of the above and in choosing this particular design, it is considered that the scheme takes a form which is sympathetic within the context of its immediate landscape.

**Technical Information**

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)	Yes	No
<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, Vodafone Limited 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</p>		

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

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

Vodafone and Telefonica are both Electronic Communications Code Systems Operators licensed under the terms the Communications Act 2003 to provide mobile personal communications networks in the UK. In order to improve the level of service it provides for their customers in line with its licence requirements, both companies are constantly developing their networks, as well as refining and modernising their equipment. Given the dynamic and constantly evolving nature of technological advances in telecommunications products, coupled with the demands on operators from subscribers to provide new and better quality services, this dictates a continual reinvestment programme in the infrastructure behind the use of mobile devices. Operators are currently involved in developing sites to provide coverage to areas which have not benefited from access to the full services they offer and to areas of their existing network where increased capacity or improved service quality is required.

Due to the dramatic rise in the use of mobile data, the industry has had to consider new operating models that are efficient at delivering services to a much larger percentage of the UK's population. As previously discussed both companies will pool their basic network infrastructure, while running two, independent, nationwide networks. By doing this, they will both reach far more of the country far faster than they could achieve on their own. This single network grid will automatically increase each operator's footprint by 40%, adding competition and choice for customers in areas that previously only had one operator's coverage available.

The agreement will lay the foundations for advancements in mobile technologies which can be rolled out faster to customers with enabled devices. The pooling together of the networks could also mean a reduction in the number of sites in the UK from the two operators, so there would be environmental benefits as some base stations will be decommissioned. In the future the CTIL agreement will also allow new sites to be built in areas which neither company has been able to reach on its own. From a customer perspective, users should not see any depreciation in coverage as a result of the CTIL venture as customers will continue to use each operator's independently branded networks.

Further detail regarding the general operation of the Telefonica and Vodafone networks 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.

#### Site Selection Process

Alternative sites considered and not chosen

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

No alternatives have been considered as this is an upgrade of an existing site.

**Land use planning designations:**

The proposed site is located within Bloomsbury Conservation Area. Policies Local Plan was adopted by Council on 3 July 2017 – Protecting & Enhancing Camden's Built and Historic environment are of relevance to development within a Conservation Area.

The current legislation relating to conservation areas is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990. Changes to conservation areas and the creation of new conservation areas can be carried at anytime as part of ongoing assessment by the council. There will be public consultation when any changes are proposed to Camden's conservation areas.

Additional relevant information (include planning policy and material considerations):

### **Planning Policies**

#### **National Planning Policy Guidance**

The National Planning Policy Framework – July 2018 - sets out the Government's planning policies for England and how these should be applied<sup>1</sup>. It provides a framework within which locally-prepared plans for housing and other development can be produced.

This includes supporting high quality communications stating that;

112. Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

113. The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.

114. Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that: a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services. 115. Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

a) 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, technical site or military explosives storage area; and

b) for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or

c) 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.

116. Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

### **NPPF – Conservation Areas.**

As the site falls within Bloombury Conservation Area the relevant extracts are applicable.

200. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

201. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

202. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

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, with two operators achieving coverage for multiple networks from a single lattice structure. The equipment has been sympathetically designed with the height kept to a minimum and it would enhance the provision of local community facilities and services.

### **Development Plan Policy**

#### **Local Plan**

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.

The Local Plan was adopted by Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.




## Planning Assessment

As mentioned previously, it is considered that the use of existing telecommunications infrastructure is in line with the planning policies above and will avoid the installation of an additional linear structure.

In light of the above it is considered that the proposal would not be overly intrusive in the locality and its visual impact would not outweigh the continued need and future demands to provide coverage to this area of Camden. It is evident that the proposed development adheres to the above policy. First of all, the proposal includes sharing of existing telecoms infrastructure.

Secondly, it would not have a significantly adverse effect on the character and visual amenities of the locality. The replacement antennas are proposed to be painted to match the brickwork, as per existing antennas. The fact that the installation will be visible at point in the surrounding area, does not itself demonstrate that the proposal will cause unacceptable harm to the visual amenity of locality and an ICNIRP Declaration has been submitted with this application.

## Contact Details

Name: (Agent)	<u>Andy Lewis</u>	Telephone:	<u>07824 558853</u>
Operator:	<u>Vodafone Limited</u>	Fax no:	<u></u>
Address:	<u>2 Charnwood House</u>	Email Address:	<u>andy.lewis@maxema.co.uk</u>
	<u>Marsh Road, Bristol,</u>		
	<u>BS3 2NA</u>	Date:	<u>01/08/2018</u>
Signed:			<u>Maxema Limited</u>
Position:	<u>Surveyor</u>	Company:	<u></u>
		(on behalf of CTIL and above operator)	