

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	York Way	Site Address:	York Way Kings Cross SW Kings Cross York Way London Islington N1 9AA
NGR:	E: 530327, N: 183324		
Site Ref Number:	76811	Site Type: Macro	Street Works Monopole

2. Pre Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why: After a phone call to the LPA it was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	21st December 2018
Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	The Director of Planning
Summary of outcome/Main issues raised: At the time of preparing this submission, and despite our attempt to engage in pre-application dialogue with the LPA, no comments had been received in respect to the proposals. A meeting however, was conducted with WHP and the Councils Connectivity Officer and the proposed location was discussed (on site) and supported.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green
Prior to the submission of this application the applicant initiate pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues.	

Summary of outcome/Main issues raised: No responses had been received at the time of submission.

School/College

Location of site in relation to school/college: There are no schools in close proximity 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?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/A		

Developer's Notice

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

3. Proposed Development

The proposed site:

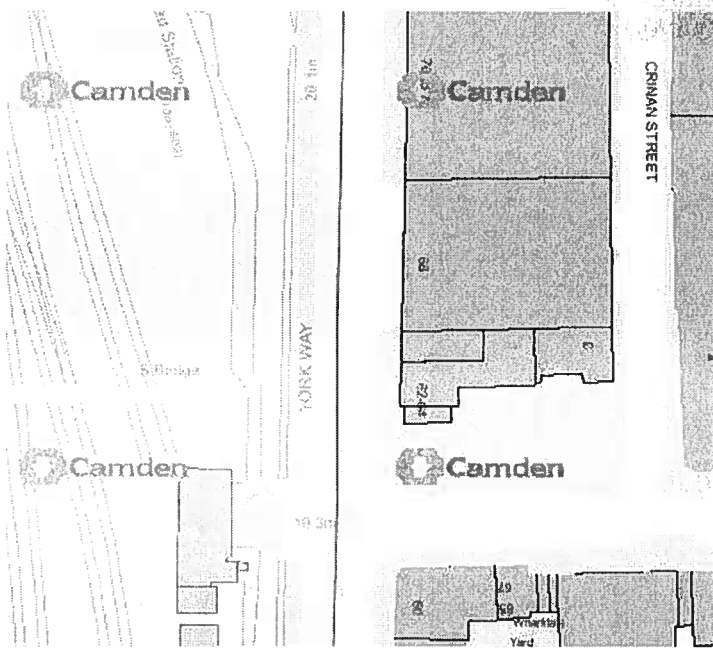
The DSA (Designated Search Area) covers the railway tracks between Kings Cross / St Pancras Station and Goods Way and a wider outlying area beyond this. The search area is focussed / targeted and so potential opportunities away from Network Rail owned land are in short supply.

Site Ref	76811	Site Address:	York Way, Kings Cross, London, N1 9AA
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Local Planning Authority: London Borough of Camden

Development Plan: Camden Local Plan (2017)

Fig.1 – CA Map Extract (reference only)



Site and its surrounds

Policy Relevant to the Development Site:

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

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

Policy Analysis:

Policy D2 states:

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

The proposed works on this site would be suitably distant and diminutive in scale and design (when seen in context) as to not be to the detriment of the surrounding area or its character (the visual change would be limited), and yet would provide the requisite coverage needed in the area as well as facilitate site sharing, so according with the principles of the policy.

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

There is an existing redundant street works site in the DSA. O2 (34445) Kings Cross York Way is an established redundant DNS featuring a directional antenna facing the tunnels. It is mounted on a 5m pole and has a large Cannon equipment cabinet housing all of the radio/power/comms. A precedent has therefore been set for such installations in this area. This site is illustrated in figure 1 and figure 1 below:

Figure 1:

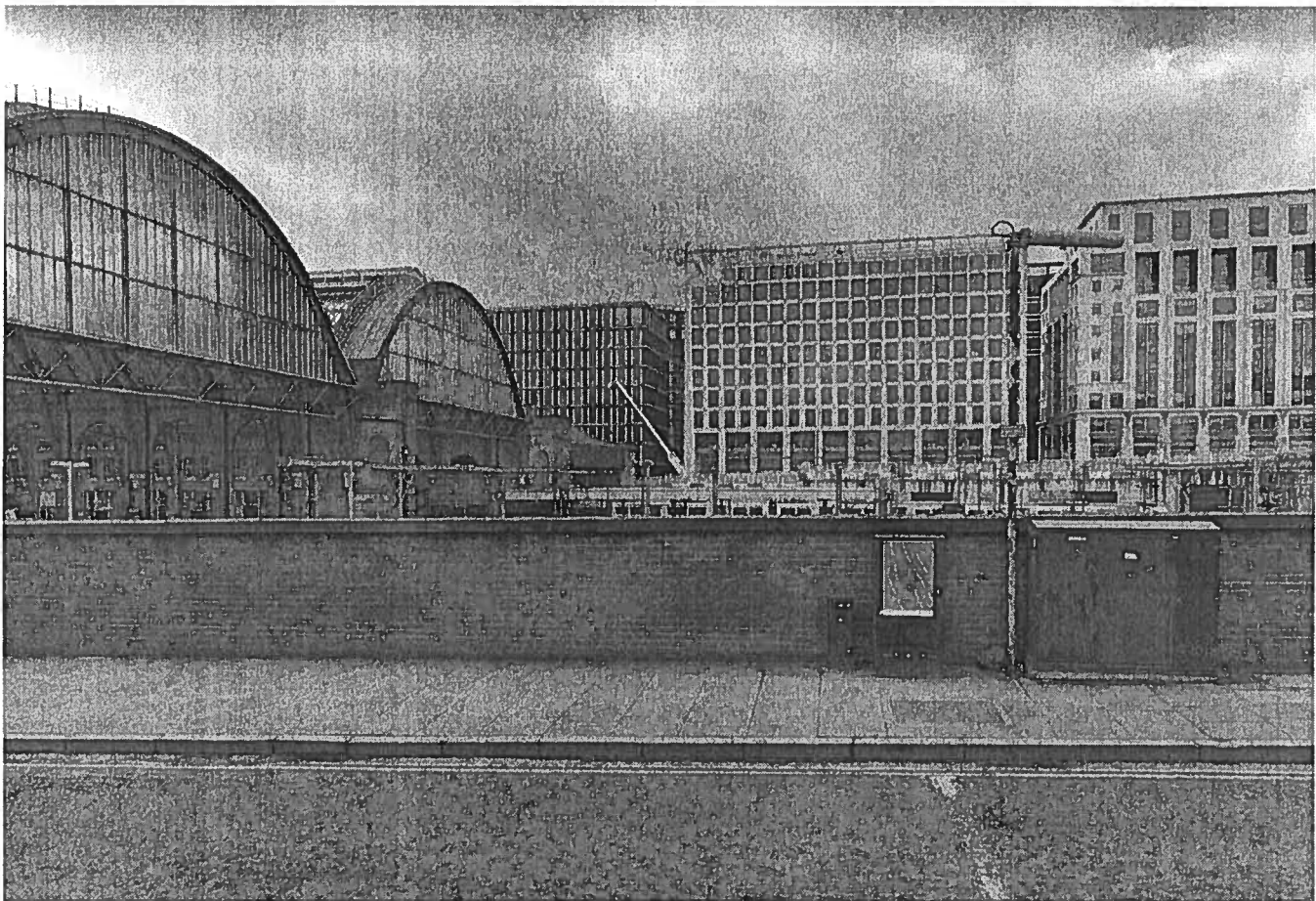
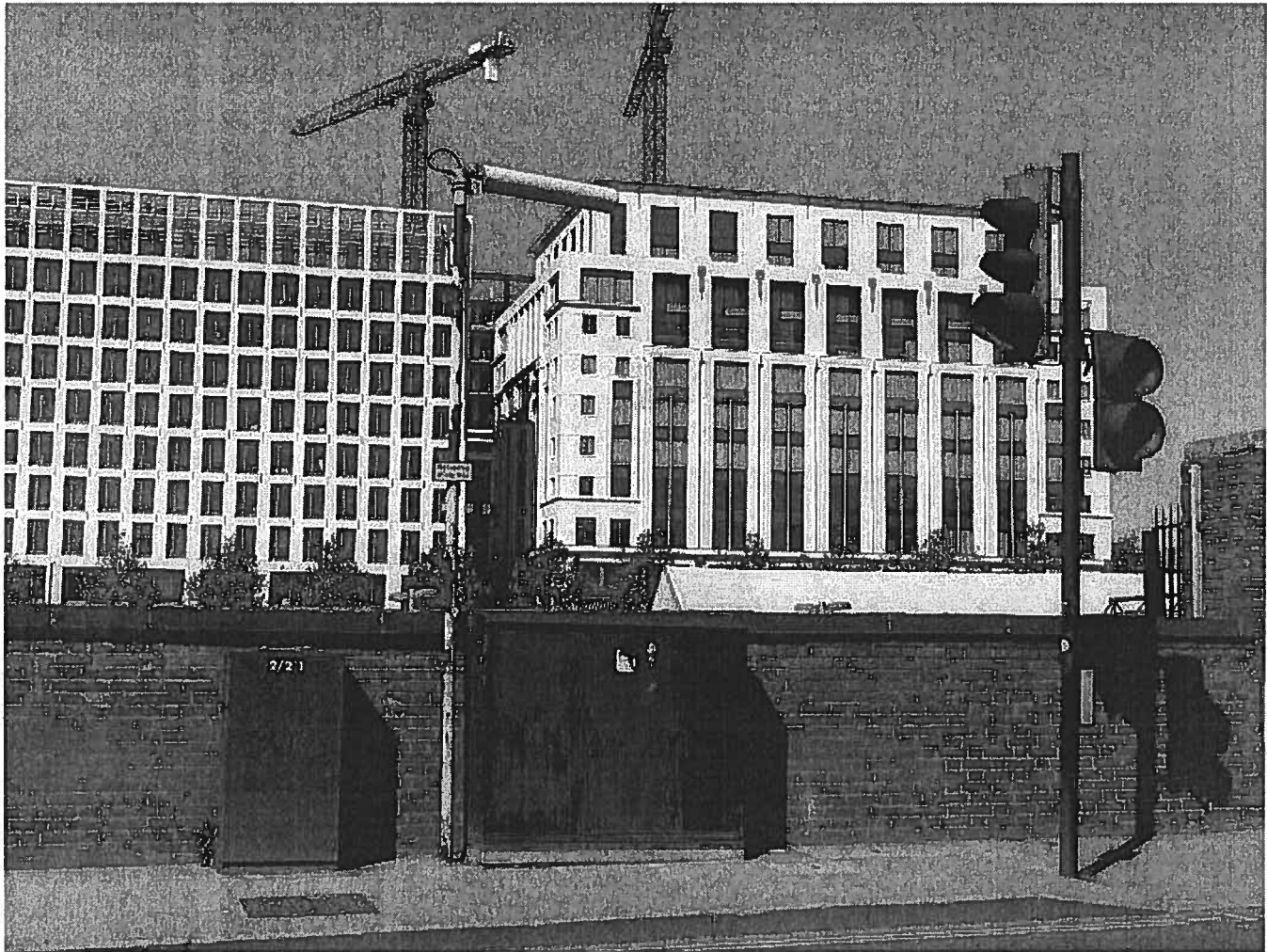


Figure 2:

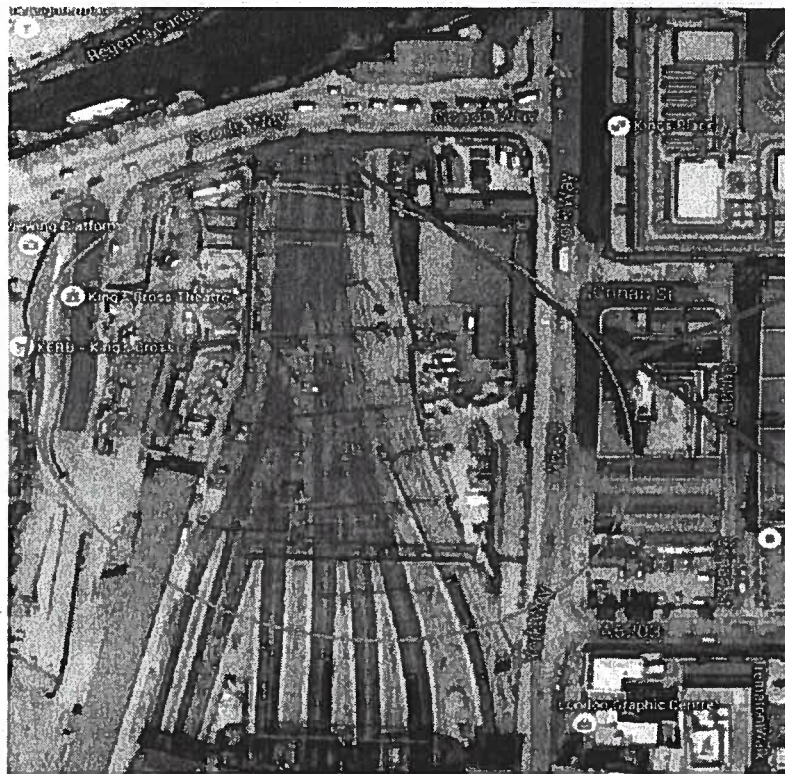


The site has been chosen in a constrained location to be away from Conservation Areas, Listed Buildings and schools and thus the TLR is rated as Green. The wider area is littered with heritage assets and Conservation Areas and thus the locating a site that will perform the very specific targeted coverage requirements and be away from these is extremely difficult.

Figure 3 on the next page illustrates the extremely constrained cell search area and the acute coverage requirements of the proposal

Figure 3:

Kings Cross



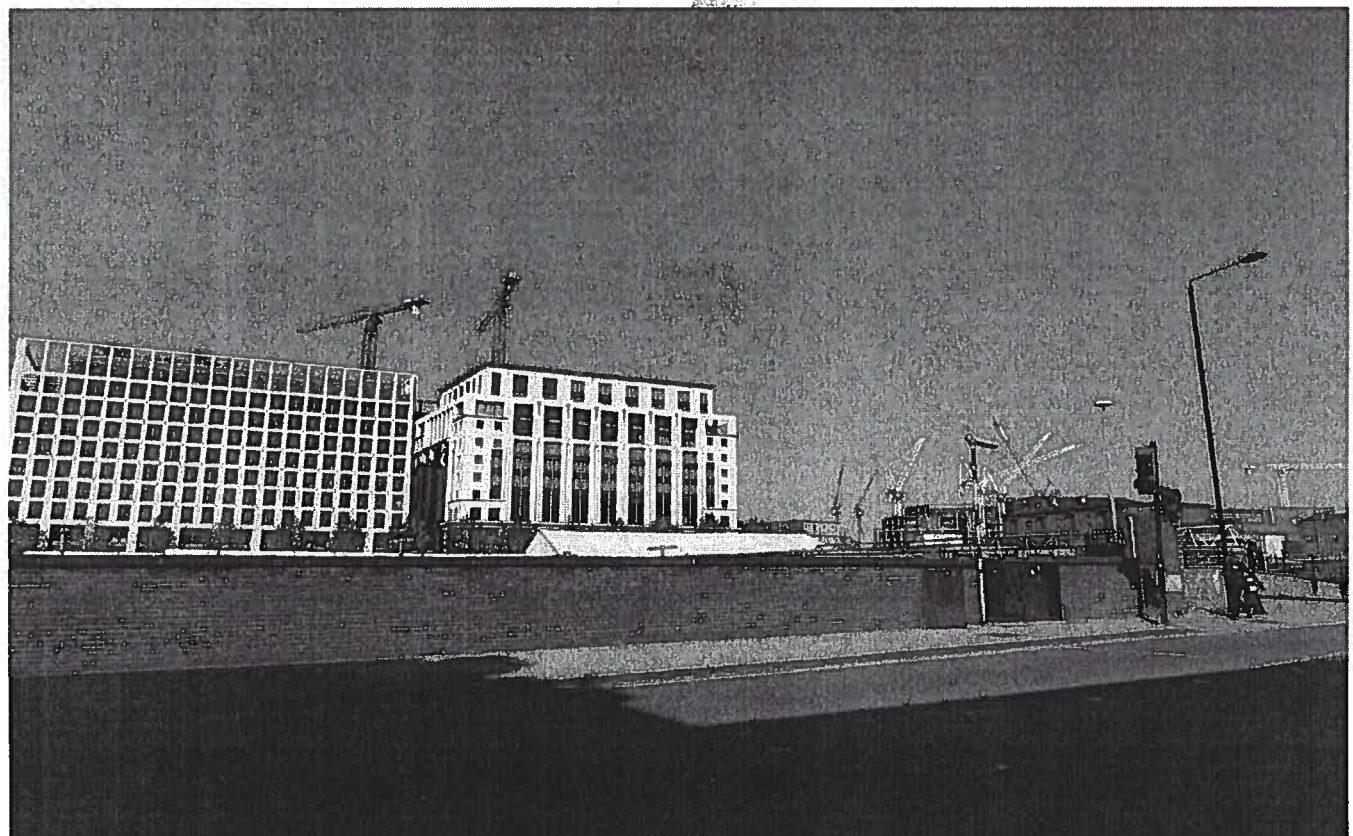
Search Area

NGR:
E 530270
N 183380

Coverage Target into Tunnel

The chosen site is captured in Figure 4 below

Figure 4:



Enclose map showing the cell centre and adjoining cells:
 This can be emailed to the LPA on request

Type of Structure	
Description:	
Tower Details:	
15m Phase 5 Streetworks Tower with GRP Shrouded Headframe mounted on new root foundation.	
Colour: Black	
Headframe Shroud Colour: Black	
Cabinet Details: Black	
Please note that the cabinets are PD without Prior Approval and thus do not form part of this Prior Approval Application	
Overall Height: 15m AGL	
Height of existing building	N/A
Equipment Housing:	
Length:	
Width:	
Height:	
Materials	
Tower/mast etc – type of material and external colour:	Black – Steel
Equipment housing – type of material and external colour:	Black – Steel

Reasons for choice of design:

The proposed installation is an EE Ltd and H3G LTE Phase 15m Streetworks Pole which will house both EE and H3G LTE. The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF

In keeping with the National Planning Policy Framework (NPPF July 2018). guidelines of using high quality communications infrastructure the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing street furniture, having similar vertical lines and overall appearance to the numerous street lighting columns (approx. running along the length of York R

4. Technical Information

ICNIRP Declaration attached	Yes	
ICNIRP 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.		
When determining compliance the emissions from all mobile phone network operators on the site are taken into account.		

Frequency:	This information can be emailed to the LPA on request
Modulation characteristics ¹	As above
Power output (expressed in EIRP in dBW per carrier)	As above
In order to minimise interference within its own network and with other radio networks, (Everything Everywhere) operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of (Everything Everywhere)'s network, the radio base station that is the subject of this application will be configured to operate in this way.	
Height of antenna (m above ground level)	15m

5. Technical Justification

Reason(s) why site required
<p>The National Planning Policy Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.</p> <p>Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.</p> <p>The site is required to provide new 3G and 4G coverage for EE Ltd in order to improve coverage in the N1 area of Kings Cross and specifically onto the railway tracks and the station. The cell search areas for 3G and 4G are extremely constrained with a typical cell radius of approximately 250m meaning that it would not be feasible to site the column outside of this locale.</p> <p>Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information on Radio Network Development for Planning Applications'. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.</p>

¹ The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase modulation

The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation

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

Discounted Options

In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) following search criteria have been utilised. Firstly consideration is always given to sharing any existing telecommunication structures in the area, secondly consideration is then given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground based installations are investigated.

This sequential approach is outlined below:

- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Ofcom Site Finder mast register is always examined prior to the submission of an application.

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

DISCOUNTED OPTIONS:

D1 – York Central, York Way – Rooftop NGR: E 530356 N 183374 – WHP spoke to the managing agent at HML Hawksworth and discussed the possibility of installing telco equipment on the building. WHP were advised that the York Central Residents Association are very protective of their building and in her view the approach would not be well received. The agent also further advised that many of the high rise flats have roof gardens and that there is a communal roof garden area at lower for those in the warehouse studios.

D2 – SW outside Premier Inn hotel, York Way – SW NGR: E 530339 N 183332 – There is not sufficient space on the pavement and there are potential ICNIRP issues with locating a mast at this location or indeed any stretch of this road.

D3 – Kings Cross Service Ramp, Goods Way – Rooftop NGR: E 530237 N 183372 – Discounted as the future of the Service Ramp is unknown and it is earmarked for demolition and further redevelopment as part of the large scale works underway in the area around Goods way.

D4 – Kings Cross Theatre – Non-structural temporary buildings – Rooftop NGR: E 530219 N 183378 – Deemed unsuitable for a telco installation owing to their construction.

D5 - Street works, Kings Cross York Way, Kings Cross, London, N1 9AG NGR: E530324 N183341 – This site slightly further away from the proposed site was drawn up by WHP as a monopole but has not been submitted as there is no location on the pavement that is not sterilised by existing underground services.

D6 – (opposite side of the road) Street works, Kings Cross York Way, Kings Cross, London, N1 9AG NGR: E530334 N183133 – Any site on this side of the road is extremely close to the existing tall buildings that line York Way and thus there are potential ICNIRP issues as the antennae would be in close proximity to the windows facing the road.

D7 – SW Site on Goods Way, Kings Cross, London, N1C 4AG NGR: 530146, N183415 – any location on Goods Way is either on a bridge and thus cannot be constructed or the signal would be blocked by the tall new buildings on the road

D8 – Street works, York Way, Kings Cross, London, N1 9AG Existing but apparently unused 02 site E 530323 N 183287. The antennae has been removed and this extremely small SW site is not sharable.

D9 – Roof top, Francis Crick Institute, Midland Road, Kings Cross, NW1 1AT NGR E529936 N183096 – The building is not a viable solution from a build perspective. This has been confirmed by WHPs design team.

D10 – Roof top, building at the corner of York Road and the A 5203, Kings Cross, London, N1 9SR NGR E 530347, N 183287 – This building is lower than the others in the cell search area that have been offered in this report and thus is not expected to give coverage to both Kings Cross and St Pancras. For this reason and given there appears to be residential on the upper floors of this relatively low building this site has been discounted in favour of the other seven options put forward by WHP.

7. Additional Relevant Information

Background to the Proposal

This specific proposal forms part of an integral requirement for EE Ltd, ESN and H3G LTE to expand their respective 3G and 4G telecommunications network across London Stations specifically in this instance to enhance 3G and 4G coverage levels and network capacity within the Kings Cross area.

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

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

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

DEVELOPMENT PLAN POLICY.

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

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

NATIONAL PLANNING POLICY

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF July 2018) sets out the Government's planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people and their accountable Councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including;

- Economic Role – contributing to building strong, responsive and competitive economy;
- Social Role – Supporting strong vibrant and healthy communities; and
- Environmental Role – Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high quality telecommunications and dedicates a whole chapter to this. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraphs below clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 112 states:

"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).”

It continues in Paragraph 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.” Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded this will always adhered to before a new proposal is put forward for consideration.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 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.”

Conclusion

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

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

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

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

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Signed:	_____	Date:	<u>13/2/2019</u>
Position:	<u>Planning Manager</u>	Company:	<u>WHP</u>
		(on behalf of above operator)	
	_____		_____