SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	BT Tower	Site Address:	60 Cleveland Street London W1T 4JZ
National Grid Reference:	529225, 181922		
Site Ref Number:	149987	Site Type:[1]	Rooftop

2. Pre Application Check List

Site Selection (for New Sites only)
(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: N/A – site upgrade.		
Were industry site databases checked for suitable sites by the operator:	Yes	**No**
If no explain why: N/A – site upgrade.		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	26/03/2019
Name of contact:	Josh Lawlor
Summary of outcome/Main issues raised: Correspondence was sent to the LPA by email on 7 March 2019. Initially a response was received on 13 March confirming as the building is listed a fee of £1,236.26 would be required to receive pre-application advice. A further response was received on 26 March from Josh Lawlor who indicated a fee of £982.02 would be required. Due to the excessive scale of pre-application advice fees, and due to the minor nature of the proposal, it has been decided to proceed directly to a formal application.	

[1] Macro or Micro

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	**Green**
Outline of consultation carried out: Pre-application consultation letters were sent by email on 7 March 2019 to the Bloomsbury Ward Councillors, Cllrs. Francis, Harrison and Madlani. The site is close to the boundary with Westminster City Council. Ward councillors for the Marylebone High Street and West End Wards were also consulted.			
Summary of outcome/main issues raised (include copies of relevant correspondence): No responses have been received.			

School/College

Location of site in relation to school/college *(include name of school/college):* There are no schools close to the site. The closest is All Souls CofE Primary School which is located approximately 200 metres from the site.
Outline of consultation carried out with school/college *(include evidence of consultation):* Due to the distance from the site, and the minor nature of the proposal, no consultation has been undertaken.
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?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response: N/A – full planning application.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	N/A – full application	

3. Proposed Development

The proposed site:
The existing equipment is located on the rooftop of the BT building on Cleveland Street. The current Vodafone installation consists of 6 no. pole-mounted antennas, with ancillary equipment within a rooftop cabin. There is other communications equipment on the roof of the building. The majority of the site is Grade II listed, including the BT Tower. The building facing onto Howland Street is not listed. The existing site Vodafone equipment provides 2G, 3G and 4G coverage to the surrounding area. The upgrade of the site is required to enhance services. The replacement antennas would also provide Vodafone with 5G coverage. This upgraded development will assist in achieving the aim of providing wider scale connectivity and accords directly with the NPPF. It is noted that two sets of antennas are located on part of the building which is not listed (the eastern part of the building facing Howland Street). Only the two antennas towards the Maple Street elevation are located on the listed part of the building. The replacement antennas on the non-listed part of the building could be installed using permitted development rights, however have been included with the application to keep all the changes within one submission.

Type of Structure *(e.g. tower, mast, etc):*	*Rooftop*
Description: The replacement of 6 no. antennas on the roof of the building and development ancillary thereto.	
Overall Height:	31.9 metres (to top of antennas)
Height of existing building *(where applicable):*	29 metres (roof level)
Equipment Housings:	
Length:	N/A
Width:	N/A
Height:	N/A
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	N/A
Equipment housing – type of material and external colour:	N/A – replacement ancillary equipment to be located in existing rooftop cabin.

Reasons for choice of design, making reference to pre-application responses:
In designing the proposed scheme, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the power source (meter cabinet or generator where a REC

supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

For the installation to also provide 5G coverage for Vodafone, the only external change to the equipment would be the replacement of the six antennas on the building. There would be a neutral impact on the building. There would also be changes to the ancillary radio equipment, however this does not form part of the application as the changes would be within the existing equipment cabin on the roof of the building.

It is considered the proposed equipment is appropriately located. It has been possible to devise a scheme which would have no additional visual impact. The design would result in a less intrusive facility than other designs, therefore preserving the character and appearance of the area. It is further considered the proposal strikes an appropriate balance between operational and environmental considerations, and the impact of the development would be outweighed by the significant public benefit of the proposal.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)* 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. 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, Vodafone Ltd 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 Vodafone Ltd’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 radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.	**Yes**	No

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.		

4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

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

The proposal would provide Vodafone with continued 2G, 3G and 4G services to the surrounding area, along with new 5G coverage. It would provide improved localised coverage and link with sites in neighbouring cell areas to form part of the national networks.

In addition to the voice and texts services available with 2G and 3G coverage, 4G (also known as LTE) allows users of the network to benefit from ultra-fast speeds when browsing the internet, streaming videos, or sending emails wherever they are. It also means faster downloads on the go. The development would allow improved capacity and download speed to customers in the area.

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, (https://www.ofcom.org.uk/research-and-data/multi-sector-research/cmr/cmr-2017/uk). The 2017 report states:

'*By June 2016, 44% of all fixed broadband connections were able to receive actual download speeds of 30Mbit/s or more, up from 38% a year previously. Nearly two-thirds of mobile subscriptions were enabled for 4G, up from 46% in 2015. Consumers are also using these networks more – average data use per fixed line residential broadband connection increased by 36% year on year to 132GB in June 2016, and average data use per mobile connection increased by 44% to 1.3GB.*

Most households have both fixed broadband and a smartphone, and consumers are moving seamlessly between fixed and mobile connections. Our mobile-appbased research shows that around two-thirds of data connections made by our panel of Android smartphone users are via a WiFi network, with the remaining third via a mobile network.

Smartphones are the way many of us keep connected. They are now firmly established as the most widely owned internet-enabled device, with more than seven in ten consumers owning one, up by 5 percentage points from the previous year, and four in ten internet users consider smartphones to be their most important device for accessing the internet.

The increase in 4G availability and take-up, along with the availability of mobile tariffs with generous inclusive data allowances, contributed to a 44% year-on-year increase in average mobile data consumption – 1.3GB per connection in June 2016.'

It is therefore very important for 'mobile only' households that live and work and any businesses that operate in this part of the LPA's area, together with visitors and others who are staying in or travelling through the area, that the necessary indoor RF coverage is provided to enable them to have satisfactory mobile telephony and internet access, and

thereby help achieve the Government's objectives for inclusive development and the rollout of modern high-speed communications networks.

The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

It is for these reasons that the National Planning Policy Framework places such emphasis on encouraging the continued rollout of high-speed digital infrastructure networks, of which the proposed development will form a key part.

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. 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)

Site	Site Name and address	National Grid Reference	Reason for not choosing
			N/A

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

Paragraph 113 of the revised National Planning Policy Framework, in which the Government's supportive stance towards developing high quality communications infrastructure is laid out, states that "*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."*

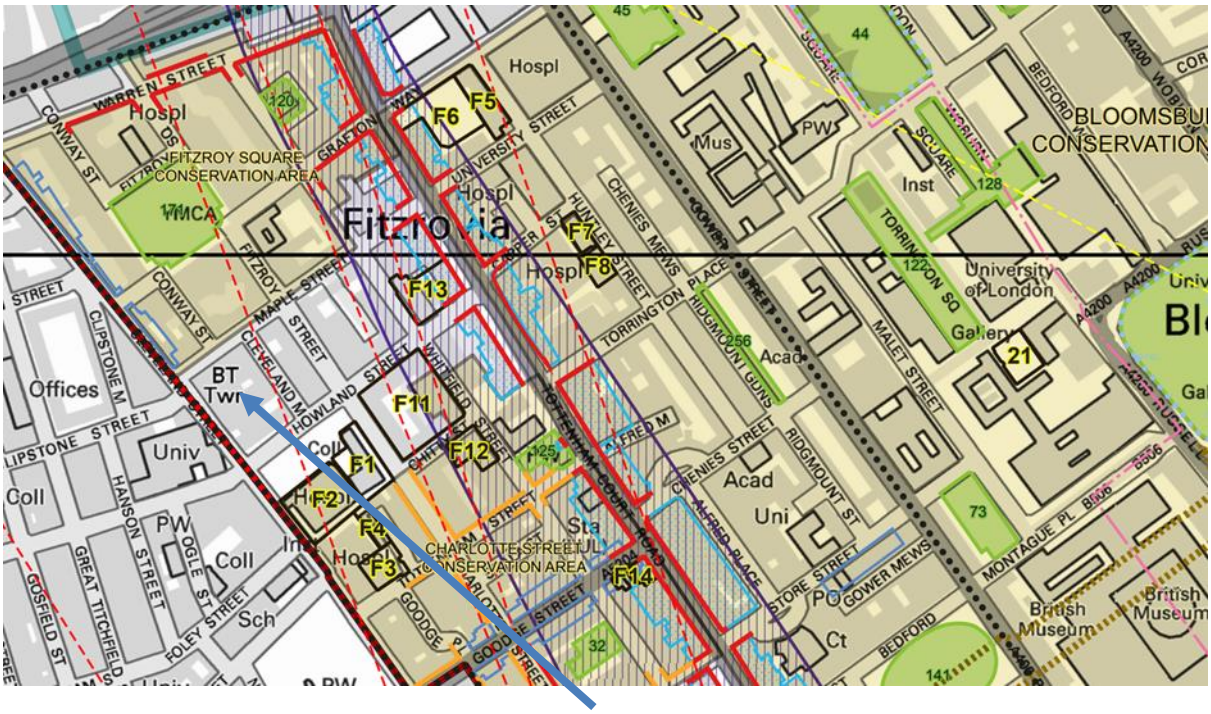
The proposal is for works at an established telecommunications site and not for the development of a new site, thus the consideration of alternative sites is not appropriate. The applicant has examined its portfolio of sites in this region and determined that there are no alternatives in the area which can be upgraded to meet the specific technical requirement. The application site represents the only feasible option in this instance which allows the requirement to be met without the deployment of an additional base station in the locality.

Environmental Information:

As far as practicable the proposed upgraded development has been designed to keep to a minimum the impact of the development on the surrounding area. The only external change would be the replacement on antennas on the building, utilising the same locations on the roof.

A check of the Environment Agency website has confirmed the site is within an area with a low risk of flooding.

Land use planning designations:



Site location

The above map is taken from the Council's policies maps. The map confirms the site is located outside of any designated area, with conservation areas to the north and south. As previously noted the building is Grade II listed.

Additional relevant information (planning policy and material considerations):

VISUAL IMPACT AND APPEARANCE

An upgraded installation is required to provide enhanced coverage to the area for Vodafone. The site would provide additional 5G coverage to the area, along with the existing 2G, 3G and 4G services.

It is considered that the proposal utilises the most suitable design available to meet coverage demands. It is important to keep the impact of telecommunications development in the area to a minimum, and this proposal achieves this. The substantial benefits of the proposal, providing 5G coverage to the area, with no additional impact on the host building or surrounding area, ensures optimum use of the building.

As noted previously, the majority of the building is listed, however only two of the antennas are located on the listed portion. The other antennas are on a building which is not listed, and these antennas could be replaced utilising permitted development rights.

It is considered that the proposed location is the least visually intrusive site and design available to the applicant which also ensures the required coverage can be provided. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding visual harm to the site and its wider setting.

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the extremely limited harm it may impose on the surrounding area being outweighed by the provision of enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2019) (NPPF)

The new National Planning Policy Framework, which came into force in July 2018, replaces the guidance published in March 2012. The guidance has subsequently been updated in February 2019. The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "*The purpose of the planning system is to contribute to the achievement of sustainable development*", and in paragraph 10 that "*at the heart of the Framework is a presumption in favour of sustainable development*". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

"*a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy*."

For **decision-taking** (paragraph 11) this means:

"*c) approving development proposals that accord with an up-to-date development plan without delay; or*

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Further to this, paragraph 38 states that "*Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area*."

The proposed development will enable the provision of reliable and improved mobile communications services to the surrounding area, bringing about substantial public benefit both socially as well as the allowing for certain businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the 'virtual office', thus reducing the need to travel and contributing to the sustainability agenda.

Government advice in recent years has been to promote and encourage communications services. Within his presentation to Parliament in July 2015 of the Government report "Fixing the Foundations: Creating a more prosperous nation" the Chancellor of the Exchequer reiterated the importance of a high-speed digital communication infrastructure. *"7.1 Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.*

By reducing regulatory red tape and barriers to investment, the government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published in March, of near-universal 4G and ultrafast broadband coverage."

The NPPF (2019) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

"*b) infrastructure for transport,* ***telecommunications*** *(our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"*

Leading on from this, paragraph 112 states that "*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*".

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 113 states that "*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*".

By utilising an established base station site, and providing enhanced coverage without an additional visual impact, the proposal is in line with the above policy.

In terms of heritage assets, section 16 of the guidance deals with 'Conserving and enhancing the historic environment'. Paragraph 184 sets out that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 196 states: "*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, where appropriate, securing its optimum viable use."* It is considered there would be a less than substantial harm, and that limited harm would be outweighed by the significant benefits of the proposal.

It should be noted that paragraph 116 states that "*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*".

The proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

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 for the Camden Council, relevant to the proposal, comprises:

- The London Plan: Spatial Development Plan for Greater London;
- The Camden Local Plan (2017).

<u>The London Plan</u>

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 networks, that London requires to secure its long-term growth.

It is considered that the applicants' network is 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 the 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 street-based 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 Vodafone to provide enhanced high-quality coverage to the surrounding area.

<u>Local Plan</u>

There are no policies relating directly to communications development within the Camden Local Plan. General policies of relevance include D1 (Design) which requires a high standard of development, and policy D2 (Heritage). Policy D2 aims to preserve and enhance Camden's heritage assets, including conservation areas and listed buildings.

It is considered the proposal complies with both policies. The scheme has been specifically designed to ensure no additional impact on the host listed building or surrounding area. There would be no additional impact, therefore heritage assets would be preserved.

No conflict with been identified with any other development plan policies.

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 protect visual amenity and heritage assets.

DESIGN AND ACCESS STATEMENT

This Design and Access Statement is provided in conjunction with the Supplementary Information form, drawings and other material that has been submitted with this application. The level of detail in this Design and Access Statement is proportionate to the complexity of the application.

Amount
The replacement of 6 no. antennas on the roof of the building and development ancillary thereto.

Layout
The proposal is set out on the attached drawings and is confined to the useable areas of the roof and takes into account existing equipment, safety measures and access arrangements.

Scale
The scale of the proposed development will remain unchanged.

Landscaping
The proposed development is on the roof of an existing building, therefore there is no landscaping proposed as part of this application.

Appearance
The appearance of the development will not materially change.

Historic Environment & Heritage Assets
Part of the host building is a Grade II listed building. An assessment of the impact of the proposed development upon heritage assets is contained within the supporting planning appraisal, and confirms they would not be harmed.

Access

Given the siting of the proposed equipment on the roof of a private building, the site will only be accessed by those personnel associated with the applicant. The public will have no interest or need to access the equipment. Therefore, it should be recognised that access to the proposal is set well away from recognised public rights of way and is remote from recognised pedestrian and vehicular movements within the public realm.

The applicant will make use of on-site and existing internal routes during works. It is likely that once completed, the site will be visited infrequently for maintenance purposes only. Right of entry to the site will be primarily by foot in which the applicant will make use of on-site and internal access arrangements so as to gain access to the antennas and ancillary equipment. In the event of the antennas needing to be maintained this will be achieved by rooftop access.

Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. The upgrade to this existing site is proposed to provide enhanced coverage to the surrounding area for Vodafone. A simple design solution is proposed to mitigate visual impact and prevent harm to the local environment.

The proposed development is compliant with the relevant policies from the NPPF and Development Plan, as outlined within this supporting statement.

The proposal is fully compliant with ICNIRP guidelines and declaration of compliance has been provided.

Confirmation that submitted drawings have been checked for accuracy

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Signed:		Date:	5 April 2019
Position:	Planning Department	Company: (on behalf of Cornerstone and above operator)	Waldon Telecom Ltd