

## SUPPLEMENTARY INFORMATION

### 1. Site Details

Site Name:	London Telecom Tower	Site Address:	London Telecom Tower
NGR:	529217/181917		60 Cleveland Street London W1T 4JZ

### 2. Pre Application Check List

#### Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	
If no explain why:		
Was the industry site database checked for suitable sites by the operator:	Yes	
The proposed site for the installation of a transmission dish is an existing telecommunications structure. As locating facilities on existing structures, particularly one already accommodating telecommunications equipment is favoured by local and national planning policies coupled with the specific nature of the equipment required it was not considered necessary to establish the presence of alternative locations.		

#### Pre-application consultation with LPA

Date of written offer of pre-application consultation:	01/08/2019
Was there pre-application contact:	Yes
Date of pre-application contact:	01/08/2019
Name of contact:	Duty Officer
Summary of outcome/Main issues raised:	
Camden Council was contacted on the 01/08/2019 with regard to the application. The planning officer confirmed that a Heritage Statement would be required.	

#### Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green	
Outline Consultation carried out: NA		

Summary of outcome/Main issues raised:

NA

### School/College

Location of site in relation to school/college

None in vicinity

Outline of consultation carried out with school/college

NA

Summary of outcome/Main issues raised:

NA

### 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:		
This is a full planning application, not an application for prior approval		

### Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	12 <sup>th</sup> August 2019	

### 3. Proposed Development

The proposed site:

The application site is located on an existing 189m tower at 60 Cleveland Street, London, W1T 4JZ

The scheme merely seeks to install;  
Add 1 x 0.6m microwave dish

On the London Telecom Tower which is already populated with a significant amount of telecommunications equipment.

Given the height and size of the mast and the existing population of equipment, it is believed that the impact on the locality, in relation to 1 x 0.6m microwave dish, will be minor.

Enclose map showing the cell centre and adjoining cells:
Not Applicable

<b>Type of Structure</b> A 189m tower located at 60 Cleveland Street, London. The tower is 189m in height and already contains a large array of telecommunications/communications apparatus. The installation consists of 1 x 0.6m microwave dish. The dish will be mounted on a galvanised steel framework at a height of 133m	
Description:	
Overall Height:	
Height of existing building	189.00Metres
Equipment Housing:	
Length:	NA
Width:	
Height:	
Materials	
Tower/mast etc – type of material and external colour:	White Steel – Dishes
Equipment housing – type of material and external colour:	

Reasons for choice of design:
<p>Use of existing structures for network development purposes is encouraged.</p> <p>This scheme merely seeks the addition of 1microwave dish on to an existing telecommunications facility.</p> <p>We are proposing to place the dish at a height of 133m which will limit the visual impact from ground level. We are also using the smallest feasible dish necessary to meet the requirement of point to point transmission.</p> <p>All these elements combine to result in a proposal that does not significantly impact on the visual amenity of the surrounding area.</p>

#### 4. Technical Information

ICNIRP Declaration attached No ICNIRP Certificate is required for the proposed works as dish antennae do not impact on emissions regulated but he standard in anyway	No	
Height of antenna (m above ground level)	D1 – 133.00m	

## 5. Technical Justification

### Enclose predictive coverage plots. - NA

Reason(s) why site required e.g. coverage, upgrade, capacity (map attached if required):

Savills Telecom is currently in the process of designing and implementing a wireless network as such they need several links and sites in order to establish a connection. The dish at this site will allow them to use this location as an intermediate hop for the overall end to end connection.

This is a micro-engineering project to link Slough to the London Stock Exchange by high-speed data. The bearings of the dishes and their locations on the rooftop are determined by the need for "Line of Sight" between sites in the network.

The scheme merely seeks to install 1 new dish on a tower that is already populated with telecommunications equipment

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

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

In this instance it is imperative, that in order to establish point to point contact, that the transmission dishes are sited at the proposed location. Furthermore as the tower already accommodates a variety of telecommunications/communications equipment, the transmission dishes are unlikely to have a significant adverse impact on the visual amenity of the surrounding area and would preserve the setting of the locality. Consequently no alternative locations were looked at

Additional relevant information:

I would again like to stress that we have carefully placed and designed the scheme to ensure that the principals of good siting and appearance have been adhered to. The overall impact of the installation on the environment is limited.

**Siting:**

The proposed installation will see Savills Telecom installing 1 x 0.6m microwave dish and ancillary development.

The dish is to be mounted on a galvanised steel framework at a height of 133m on the 189m tower. We have sought to limit the size of the dish as much as is technically possible and mounted it at a level, 133m, which means there visual impact at ground level will be significantly limited

**Visual appearance:**

This scheme merely seeks the addition of 1 microwave dish on to an existing telecommunications/communications facility.

The mast has existing telecommunications apparatus and has been used as a transmission station since its construction in 1964. With this proposal the utmost care has been taken to minimise further visual impact from the dishes. We feel this proposal achieves this balance between environmental and technical constraints.

The dish size has been restricted to the smallest technically possible. It should also be stressed that the height of the structure combined with small scale of the dish will significantly limit the visual impact of the installation.

The mast already houses a number of mobile phone antennae and microwave dishes, the addition of 1 microwave dish to a tower that already houses a variety of communication apparatus and the installation, is believed to have a neutral impact on the listed mast.

The proposed developments purpose is to make use of an existing telecommunications facility. Whilst the proposals are on an iconic listed building within London, the historical significance and bespoke design of this building is for the sole purpose of telecommunications use. The proposal seek to install 1 x 0.6m microwave dish at a height of 133m, the dish will be sited amongst a number of other users communications apparatus.

The proposals would be of standard microwave transmission design similar to the existing dishes. The size of the dishes proposed and the location mean that the dishes will not protrude beyond the building line, as such they are not considered to have an adverse impact upon the listed structure.

The proposal to the contrary would have a positive impact upon the structure by assisting to reform the functional link between the structure and its historical significance. Furthermore the proposed development would provide rental income which would be used for the on-going upkeep and maintenance of the structure.

In conclusion, the micro-siting is such as to best minimise the visual impact on the area whilst achieving the technical requirements of the site.

**Access**

Maintenance and build access for the installation will be via Cleveland Mews. Once constructed, the site will only require maintenance access which can be undertaken on foot by a maintenance operative. No vehicles will need to be parked on the roadside for these

operations and as such no obstruction of the footway or highway will be necessary.

### **Consideration of alternative sites**

In this instance it is imperative, that in order to establish point to point contact, that the transmission dishes are sited at the proposed location. Furthermore as the tower already accommodates a variety of telecommunications/communications equipment, the transmission dish is unlikely to have a significant adverse impact on the visual amenity of the surrounding area and would preserve the setting of the locality. Consequently no alternative locations were looked at

## **PLANNING POLICY**

### **National Planning Policy – Telecommunications**

The revised National Planning Policy Framework (rNPPF) was published on 24 July 2018 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements. The NPPF sets out the Government's economic, environmental and social planning policies.

The revised NPPF states that plans and decisions should apply a presumption in favour of sustainable development running through both the plan-making and decision-taking process. This means approving development proposals that accord with the development plan without delay, and where there are no relevant development plan policies, or the policies which are most important for determining the applications are out-of-date, granting permission unless:

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

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.

The rNPPF outlines the 3 strands of sustainable development as economic, social and environmental. Therefore, for development to be considered as sustainable, it should seek to deliver demonstrable benefits across each 'strand'.

Paragraphs 112-116, detailed below, are now the relevant paragraphs for supporting high quality communications.

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 34 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.

## **SUMMARY**

National planning policy as set out in The National Planning Policy Framework (NPPF) is to facilitate the growth of new and existing telecommunications systems, The NPPF also urges authorities to understand the technical constraints faced by telecommunications operators even in areas where development is usually subject to restraint. The NPPF also strongly encourages site sharing and the utilisation of existing buildings .This application provides the most reasonable service acceptable to Savills Telecom Limited whilst ensuring that the environmental impact of the proposal is minimised. The proposal will not harm the character & appearance of the area and will be wholly visually acceptable at the application site. For the reasons set out above, we consider that this application should be approved.

## **Local Planning Policy**

The London Plan adopted in July 2011, provides the development strategy for Greater London. Policy 7.8 describes that in determining planning decisions LPA's should consider whether proposed development identifies, values, restores, re-uses and incorporates heritage assets. Development affecting heritage assets should conserve their significance, whilst being

sympathetic to their form, scale, materials and architectural detail.

Policy 7.11 of the London Plan details the strategic need to protect views that make a significant positive contribution to the image and character of London. The BT Communication Tower (London Telecoms Tower) lies within the strategic view between Parliament Hill and the City. Policy 7.12 sets out procedures and guidance for implementing the London View Management Framework. This states that new development should not harm, and where possible should make a positive contribution, to the strategic views and their landmark elements. Policy 7.12 also sets out criteria for considering planning applications which may impact upon protected vistas.

The London Borough of Camden set out their vision for the Borough within their Core Strategy adopted 8th November 2010. This forms the central part of Local Development Framework for the borough. The most relevant of the Core Strategy's policies to this proposal is CS14: High Quality Places and Conservation of Heritage. Part b) of this overarching policy sets out that Camden wish to preserve and enhance their listed buildings and heritage assets, such as the iconic BT Tower ( London Telecom Tower)

Camden's Development Policies were adopted as part of the Local Development Framework in November 2010. These provide the detail for how the Camden will view applications for proposed development and achieve the vision set out with the Core Strategy. The most relevant planning policies in relation to the proposals are DP24: Securing high quality design and DP25: Conserving Camden's Heritage.

DP24 sets out the all development including alterations to existing buildings should be of the highest standard and consider the context of the building, quality of materials use, appropriate location of building services.

DP25 details how Camden will conserve local heritage, including conservation areas and listed buildings. The key points amongst this policy are that Camden will "not permit development outside conservation areas which causes harm to the character and appearance of the conservation area" and, in respect of the preservation of listed buildings, the "Council will only grant consent for...alterations...to a listed building where it considers this would not cause harm to the special interest of the building"

The proposed development consists of the installation of 1No. dish to be fixed onto the BT Communication Tower (London Telecom Tower) at a height of 133m above ground level. The tower is an established iconic building purpose built for housing telecommunications apparatus and is recognised for its significance in its Grade II listing (2003). The tower also falls within the Strategic View from Parliament Hill to the Palace of Westminster protected through the London Plan under policies 7.11 and 7.12 (2011).

The proposal would site additional telecommunications equipment in an area of the tower with a large number of existing transmission dishes. The proposed dish is of standard design which would match the existing telecommunications equipment, therefore respecting the type and nature of the listed structure. The proposed height and location of the dish, set back from the main gantry edge, would be visible in long views of the BT Tower from the east and west, but not visible in short views due to obstructions. In these long views, the impact of the dish is considered to be minimal given they are observed in context with the existing communications dishes.

In respect of the impact of the listed structure the addition of the extra dish to the tower would,



in my view, restore the functional link between the tower and its historical significance as a symbol of technological advancement. The proposals therefore would enhance the significance of the heritage asset.

In terms of the impact upon strategic views the proposed development would not protrude beyond the BT Tower building line, as such there would not be any significant impact upon the strategic views. Given the size and positioning of the dish, and length of the strategic view, it is considered that no discernible impact would be perceived. In terms of the visual impact of the dishes on the landmark BT Tower, the proposals would, in my view, add context to the landmark by restoring its functional and historical significance as a symbol of telecommunications technology. Considering this the proposed development would accord with the principles set out within London Plan Policies 7.11 and 7.12 (2011).

In conclusion the 1 No. dish mounted at 133m are not considered to have a significant visual impact upon either the local area or the character of the listed building. In my view, the dish would be in keeping with the special character of the building, enhancing its telecommunications presence, therefore according with the principles of Development Plan policies Core Strategy Policy CS14 (2010), Development Policies DP24 and DP25 (2010) and London Plan Policies 7.11 and 7.12 (2011)).