

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	RCPCH	Site Address:	5-11 Theobald's Road London WC1X 8SH
National Grid Reference:	530815, 181882		
Site Ref Number:	CAM0101	Site Type: ¹	Macro

2. Pre-Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing sites)

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 Upgrade site.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: N/A		

Site specific pre-application consultation with local planning authority

Was there pre-application contact:	Yes	No
Date of pre-application contact:	16 September 2019	
Name of contact:	Matthew Dempsey	
<p>Summary of outcome/Main issues raised: A pre-application consultation email was sent to the LPA on the 16/9/19 introducing the proposal which included site-specific draft drawings and outlined the need for the existing telecommunications base station to be upgraded and redeveloped. To date no comments have been received.</p> <p>After a follow up email to the planning department, it was advised that there is a charge of £989 for providing pre-application advice. Therefore, it was considered that when balancing the fees of the LPA for informal advice, together with those incurred for a formal determination, the proposal subject to this application would be advanced.</p> <p>Although no LPA comments have been forthcoming, as the proposal relates to the upgrade of an existing base station and the principle of telecommunication development is established on-site, it was considered appropriate to progress this application and seek the LPA's formal determination.</p>		

¹ Macro or Micro

Community Consultation

Rating of Site under Traffic Light Model if required:	Red	Amber	Green
Consultation letters were sent by email on 16 September 2019 to the Holborn and Covent Garden Ward Councillors – Cllrs. Fulbrook, Olad and Vincent			
Summary of outcome/main issues raised: No comments have been received.			

School/College

Location of site in relation to school/college: St George the Martyr C of E Primary School John's Mews, Holborn, London WC1N 2PA, is in relative proximity.
Outline of consultation carried out with school/college: Consultation letters were sent by email to the Headteacher, Adam Young, and Chair of Board of Governors, Rev. Pope
Summary of outcome/main issues raised: No comments have been received.

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

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 planning application	

3. Proposed Development

The proposed site:	
The application site is located in central London north of the Thames River, southeast of England.	
Surrounding land uses are mainly offices, legal chambers and retail.	
The proposed development is situated within the Bloomsbury Conservation Area. 5-11 Theobalds Road is an unlisted building with proximity to the Grade II listed 24 Bedford Row and Grays Inn.	
The building is a 20 th century, 6 storey office building, composed of stone, brick and glass with a mansard roof approximately 22.5 metres high to the main roof and 26.5 metres to the top of the plant room.	
The proposed development is on the roof of 5-11 Theobalds Road.	
The existing UKB installation on the roof of the building consists of 3 no. antennas, 2 no. dishes, 3 no. Remote Radio Units (RRU), 1 GPS unit and 1 no. equipment cabinet. Permission was granted for this equipment under application reference 2013/3540/P. The existing installation has been colour matched to the building.	
This application proposes to upgrade the equipment and involves; the removal and replacement of 3 antennas with 6 no. antenna, removal and replacement of 2 no. 300mm dish, removal and replacement of 1 no. cabinet with 2 no. cabinets, removal of 3 no. RRUs and replacement with 9 no. RRUs, retention of 1 no. GPS unit, removal and replacement of 1 no. freestanding frame, removal and replacement of 3 no. support poles and ancillary development thereto. This development will also be colour-matched as required.	
The height of the new antennas will not protrude above 27.25 metres. The proposed equipment will be in the location of the existing installation. One sector of antennas is proposed to be located towards the north side of the plant room, and one sector towards the west side of the plant room. A third sector is located on a freestanding frame at the main roof level at the south end of the building. The equipment cabinets are proposed to be in the location of the existing cabinet.	

Type of Structure (e.g. tower, mast, etc):	Frame mounted antennas
Description: The removal and replacement of 3 x antennas with 6 x antennas, removal and replacement of 2 x 300mm dishes, removal and replacement of 1 x cabinet with 2 x cabinets, removal and replacement of 3 x RRUs and replacement with 9 x RRUs, retention of 1 x GPS unit, removal and replacement of 1 x antenna support frame, removal and replacement of 3 x support poles and ancillary development thereto.	
Overall Height:	27.25 metres to top of antennas
Height of existing building (where applicable):	22.5 metres to main roof Level
Replacement Equipment Housings:	
Length:	2 x 0.6m
Width:	2 x 0.48m
Height:	2 x 1.0m
Materials:	
Tower/mast etc – type of material and external colour:	N/A
Equipment housing – type of material and external colour:	Steel coloured matched to building colours

Reasons for choice of design:

Every effort has been made to minimise the visual impact of the proposed development. The equipment has been designed specifically for this location and incorporates a number of elements to minimise impact, including:

- 1) Utilising an existing rooftop and communications site to keep the overall number of sites in the area to a minimum. The alternative would be to utilise an additional site to provide 5G coverage to the area which would result in a greater overall impact on the area.
- 2) Keeping the amount of equipment to a minimum due to the location of the site within a Conservation Area. A total of six antennas, two dishes, one GPS unit, nine RRUs and two cabinets are proposed. This is an increase of three antennas, six RRUs and one equipment cabinet. The upgrade is to provide additional 5G coverage for UKB, along with the existing 4G coverage. It is not possible to provide this enhanced coverage from the existing antennas, hence the requirement to upgrade the site and add equipment to the installation. These elements of the design ensure the impact of the development is kept to a minimum.
- 3) It is considered that a scheme of soft or hard landscaping would be inappropriate in this case, as the proposal relates to the installation of electronic communications apparatus located at a height of more than 22m above ground level on the roof of a building to which there is no right of public access and within a built-up area.
- 4) There is a height increase of 1.25m between the top of the existing equipment to the top of the proposed replacement antennas. This is due to fact the taller replacement antennas will house the greater enhanced technologies (5G) and are therefore slightly larger in size. As well as the new antennas being taller, the antenna base will need to maintain a spatial clearance to the roof level.
- 5) The base of an antenna must be positioned significantly high enough so to ensure radio propagation is clear from physical objects i.e. roof parapets or edges, to avoid 'clipping' or 'shadowing' affects. Where radio signals suffer from these affects, a base station can be rendered as substandard. A substandard performing base station may create a new coverage 'deficient hole' or 'black hole' and to remedy, the Telecom Operator, may need to deploy an additional cell to infill the 'deficient hole' or 'black hole', resulting in a proliferation of unnecessary base stations. The preference is therefore to utilise and upgrade an existing base station instead of deploying an additional base station in the area.
- 6) Whilst the antennas will be taller, it is arguable that they will not be visually detrimental to the surrounding enviro particularly from street level views. Given the height of the building, the roof eaves and the colour matching of the equipment to the roof it is reasoned that the replacement antenna height will not be disrupting the local skyline.
- 7) The upgrade will also allow 4G and 5G coverage to be provided to the locality from the site.
- 8) Although a larger antenna support frame is proposed, it is required, on a technical basis, to ensure there is no penetration of the roof structure which could lead to water ingress, causing internal damage to the building. Due to the weight and size of the antennas and ancillary equipment proposed a larger ballast frame is required to ensure structural integrity is achieved. It this frame will be visually permeable and set against the skyline, handrails and building eaves and will not detract from the existing skyline detrimentally.

- 9) It is considered the proposed equipment is appropriately located to ensure proper radio propagation is achieved. It has been possible to devise a scheme which has a minimal visual impact whilst ensuring technical constraints of rooftop surface penetration are overcome.
- 10) It is considered the proposal strikes an appropriate balance between operational and environmental considerations.

Technical Information

All UKB sites are designed to be fully compliant with the precautionary guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP).

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, UK Broadband ("UKB") 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 UKB's network, 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.

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.

The planning drawings included with this application confirm the development would comply with ICNIRP guidelines.

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 UKB Group provides wireless services and solutions to the telecommunications industry, service providers, channel partners and the public sector within the U.K. UKB currently provides wireless services from across a number of sites using a combination of macro installations on tall buildings, ground based “streetworks” sites and small-scale wireless access points attached to street furniture such as lamp-posts and CCTV poles.

UKB’s main service is providing 4G network coverage to London and other major cities in the UK. UKB are now implementing upgrades to sites to also allow 5G coverage to be provided to its customers. The upgrade of this site is part of the enhancement of the UKB network.

UKB’s service is based on a network of radio base stations, which typically consist of a set of antennas and one or more small equipment cabinets. These are connected to the wider network either by transmission dishes (as in this case) or fibre-optic cables. In this case six antennas, two small equipment cabinets, one GPS unit and two transmission dishes are proposed.

The network will offer high capacity, secure, wireless, service guarantee levels needed to support initiatives including digital and social inclusion, mobile working, re-deployable CCTV security, emergency services data communications, community healthcare provision.

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 communications site and not for the development of a new installation, 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 and proposed design 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.

Additional relevant information:

Siting & Appearance

The design of the proposed upgraded base station is simplistic and minimal, with two sets of poles and one frame on which are mounted antennas and dishes located on the roof of the building. The cabinets are proposed to be located on the roof in the location of the existing and are small in scale. Overall this is considered to be the optimum form of development within this setting.

The existing installation is visible from certain viewpoints in the area, however its impact is minimal given the height of the building, the antenna height in relation to the mansard roof that sets the sky line and the use of equipment that is colour matched to the building.

The upgraded development would have a marginally greater visual impact. Its impact would be more than outweighed by the significant benefits of the proposal.

It is considered that the proposal, which would be seen within the context of existing communications equipment on the roof of the building, would not be seen as having a significant additional impact on the appearance of the building. It is submitted that the appropriate siting and high standard of design will result in a proposal which is highly suitable to its setting.

Consequently, there would be no significant or negative impact upon visual amenity, nor cause harm to the character or appearance of the conservation area.

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

Planning Context

National Guidance

National Planning Policy Framework (2018) (NPPF)

The new National Planning Policy Framework, which came into force in July 2018, replaces the guidance published in March 2012. 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-date⁷, 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 enhanced 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 (2018) 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 upgrading an existing installation to meet the required network enhancement, as opposed to the installation of a new site, the proposed is in line with the above policy.

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 as amended 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 Camden Council, relevant to the proposal, comprises:

- The London Plan
- The Camden Local Plan which was adopted in July 2017 and has replaced the Core Strategy and the Camden Development Policies document

The London Plan

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 UKB to provide continued and enhanced coverage to the surrounding area.

Camden Local Plan

The specific policies in the plan that have been considered in relation to this development are firstly Policy D1 Design, in that the Council seeks to secure high quality design in developments, requiring that development:

- a. respects local context and character;*
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- d. is of sustainable and durable construction and adaptable to different activities and land uses;*
- e. comprises details and materials that are of high quality and complement the local character;*
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable route and contributes positively to the street frontage;*
- g. is inclusive and accessible for all;*
- h. promotes health;*
- i. is secure and designed to minimise crime and antisocial behaviour;*
- j. responds to natural features and preserves gardens and other open space;*
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
- l. incorporates outdoor amenity space;*
- m. preserves strategic and local views;*
- n. for housing, provides a high standard of accommodation; and*
- o. carefully integrates building services equipment.*

Policy D2 on heritage further to this is considered in relation to the Bloomsbury conservation area as a designated heritage asset noting: ‘The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm’.

Policy E1 Economic development additionally supports the provision of high speed digital infrastructure.

As noted previously, the application site is in a conservation area. The proposal will be sited on the roof of a building with other rooftop paraphernalia and telecommunications equipment which will provide a context in which the proposal will be read. The antennas will be on a ballasted frame behind an existing rail and poles attached to the plant room wall and their height kept to the minimum required to meet the technical objective and to ensure ICNIRP compliance.

The height of the antennas is marginally above the plant room roof. Their limited height and bulk will not dominant the skyline in comparison with the eaves of the building roof. Views of the equipment will be limited to the immediate area from the west. Long views will be restricted by intervening development. Given the limited scale of development, it is not considered the proposal will have a significant impact on the visual amenity of the area when compared to the existing telecommunications facility. The design is the least intrusive possible, given technical and physical considerations, and will appear unobtrusive next to the visual dominance of the building itself, thereby resulting in less than substantial impact and preserving the character and appearance of the conservation area.

As noted previously, it is believed the limited visual impact will be outweighed by the public benefit resulting from sustained coverage and an improved public infrastructure network.

Overall, the proposal is the optimum siting option which is felt strikes a good balance between environmental impact and operational considerations and is fully in accordance with the council's development plan.

It is considered the proposal complies with all policies.

A sequential test of alternative options had previously been undertaken and the application site has been tested through the planning system, as being the best suitable option striking a balancing between operational and environmental considerations. Accordingly, the application site is an accepted and registered as a known telecom base station.

As per the original design and approved planning application, no planting is proposed for this rooftop site. The position of equipment is deemed to be sufficiently elevated above street level so not to warrant planting which would normally be employed to help screen part of the proposed installation.

The scheme has been specifically designed for this location. The replacement dishes, RRUs and additional antennas would not result in any significant change to the external appearance of the building and the replacement cabinets would have a minimal additional impact. The mass and scale of the replacement development has been kept to the minimum, so to ensure operational requirements do not override environmental considerations.

The additional impact would not be sufficient to cause harm to the host building or the character or appearance of the conservation area. The proposal will be of sympathetic scale and design given the technical and physical considerations, taking in to account the surrounding Bloomsbury conservation area.

The proposal would vertically integrate with existing structures such as railings, hoop ladder, stub mast and other ancillary equipment of a semi industrial nature, and therefore not be harmful to surrounding amenities, or harm the character and appearance of the building. The minimal additional impact of the development would be outweighed by the public benefits of the proposal.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy, the proposal is sympathetically designed, it minimises the number of installations and has a high quality of design. It would enhance the provision of local community facilities and services and would preserve heritage assets.

Summary

This application seeks permission to upgrade wireless communications equipment at this rooftop location. The apparatus proposed has been sited and designed to minimise the impact on the host building, the surrounding environment and its conservation area setting, and represents the best option available to the applicant in terms of available siting options, appropriate design and technical considerations and will result in negligible impact on the appearance of the site.

It is considered the proposal conforms to both National and Local policy. Due care has been made in minimising impact. It is further considered the benefits of the proposal outweigh the minimal impact on the location.



Contact Details

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Signed:	<u><i>Tara Graham</i></u>	Date:	<u>2 October 2019</u>
Position:	<u>Planner</u>	Company:	<u>Waldon Telecom Ltd</u>
		(on behalf of UK Broadband Ltd)	
