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| **SITE SPECIFIC SUPPLEMENTARY INFORMATION** |

1. Site Details

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| Site Name: | St Pancras SW | Site Address: | St Pancras SW  Pancras Road  Kings Cross  London  N1C 4BU |
| NGR: | E: 530126, N: 183117 |
| Site Ref Number: | 77266 | Site Type: Macro | Street Works |

1. Pre Application Check List

**Site Selection**

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| 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**

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| Date of written offer of pre-application consultation: | 6th September 2019 | |
| 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. | | |

**Ten Commitments Consultation**

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| 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**

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| 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)**

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| 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**

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| Copy of Developer’s Notice enclosed? | | Yes |  |
| Date served: | 18th September 2019 | | |

1. Proposed Development

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| The proposed site: |
| The proposed site is situated on a wide area of pavement off Pancras Road, Kings Cross London, N1C 4BU. The proposal is for the installation of a new 10.97m monopole that will provide new coverage for EE, H3G LTE and of vital importance to the area the Emergency Services Network (ESN). The railway station and the surrounding area vitally need this additional coverage and capacity. It is imperative that this is addressed ASAP in what is an extremely constrained cell search area.  The coverage requirement is extremely targeted and thus the potential to move away from the current location is not applicable.  The proposed new facility will require the installation of a limited number of equipment cabinet housing radio equipment at ground level and in close proximity to the base of the pole. These have been located so there are no highways or pedestrian issues. Free movement of people and wheelchairs will be permissible once the equipment is constructed.   |  | | --- | | 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 on giving coverage to the railway station, lines and the surrounding area and so potential opportunities away from Network Rail owned land are in short supply. Roof top owners will be nervous of the new Code and the flux this will create and thus a Street Works options would be the best solution but this will have planning considerations to take into account (from a sequential site selection perspective). |   There is an existing SW site in the DSA. O2 (34445) Kings Cross York Way is an established 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. WHP have sought a location on this road and indeed drawn up plans however, all potential locations failed on TH tests and thus all SW options on York Way have been discounted.   |  |  |  |  | | --- | --- | --- | --- | | Site Ref | 77266 | Site Address: | St. Pancras SW, Pancras Road, Kings Cross, London, N1C 4BU |     **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 site is also within the setting of a number of Listed Buildings. 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.  Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. To preserve or enhance the borough’s listed buildings, the Council will:  i. resist the total or substantial demolition of a listed building;  j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and  k. resist development that would cause harm to significance of a listed building through an effect on its setting.  The proposed works on this site would are 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 with the 10.9 metre high installation being comparable in scale, height and mass to other items of street furniture nearby) as well as respecting the integrity and setting of the nearby listed buildings, 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, so ensuring any less than substantial harm is outweighed by demonstrable public benefit.  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 are no schools, or other children’s establishments close to any of the proposed sites, that would require us to proceed with caution and so from a TLR and planning perspective WHP rate things as Green or Amber. Although option 3 is an existing telecoms site it is a Grade I Listed Building (the highest English Listings) and thus planning is expected to be extremely difficult to achieve. Presently 02 have unshielded antennae on the building which seems unusual of the LPA to have approved.  The site has been carefully selected in a position that benefits from some screening effects so as to provide the required new coverage to the area whilst minimising visual intrusion. The monopole style design has been specified in order to allow the proposal to merge with the numerous street lighting columns distributed around the vicinity of the site.  The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. H3G and EE and ESN have a network sharing agreement and thus these installations are fully compliant with the NPPF.  Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 124) of the National Planning Policy Framework. It states:  “Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”  In keeping with the National Planning Policy Framework (NPPF). guidelines of using: “high quality communications” (Section 10), the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing built environment.  The design of the proposed equipment is considered to be the least visually intrusive option available. In keeping with the National Planning Policy Framework (NPPF). guidelines of using: “high quality communications infrastructure”, the proposed street works monopole 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 street lighting columns that are common feature in the built environment. As stated above the National Planning Policy Framework advocates site sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.  The information below illustrates how constrained the cell search area is. Existing sites are illustrated by the yellow pins, an additional site is imperative to give the area the requisite coverage and capacity.  RADIO PLANNING AND PROPAGATION  When planning cellular telecommunications networks it is important for engineers to predict, with a high degree of confidence, the behaviour of cellular transmissions. This then enables the operator to calculate how many cell sites are needed to provide the level of coverage required by the services they offer under the terms of their licence.  The strength of radio signals detected at a receiving device naturally reduces the further away it is from the transmitter. In general the reduction (or decay) in signal power is affected by a number of variables. The main factors are   * frequency, * distance (from transmitter), * terrain (such as hills), * clutter (such as buildings, foliage, vehicles, and water) * and atmospheric conditions (such as rain).   A reduction in the strength of the radio signal increases the likelihood of dropped calls and reduced data rates for internet browsing, for example.  Clutter  Any physical object obstructing the propagation of radio signals causes a reduction in signal strength reaching a customer’s device. A common term for these objects is ‘clutter’. The more obvious examples are buildings and geographical terrain such as hills and trees.  Buildings cause a varying amount of signal reduction depending on their height, construction, thickness of walls, amount of windows etc. Glass causes a lower reduction in signal than brick/concrete walls.  Customers will inadvertently be aware of this by finding that sometimes they need to go near windows, a higher floor of a building or even outside in order to achieve a stronger signal for their mobile devices.  Tree Clutter  The effects of trees on signal degradation should never be underestimated. Signal absorption and shadowing effects vary according to vegetation and density, and are caused by the main tree trunk, branches and leaves.  Cell sites located in or near trees will have signals significantly reduced. As a result a number of extra sites may need to be built locally in order to counter-effect this.  Signal variation throughout the seasons is also a practical concern. Leaves on trees in the spring and summer can cause shadowing and reduce radio voice quality and increase the number of dropped calls.  As a result the bottom of an antenna should be a) above the top level of the trees, b) allow greater height due to the antenna downtilt at build or for future requirements and c) allow some room for future growth of the trees.  In the case where the cell site utilises point-to-point microwave backhaul transmission the microwave dish should not be obscured at all.  Propagation Models  In essence these are mathematical formulae used to characterise radio wave propagation, in order to determine the received signal strength at a receiving device.  The most well-known propagation model used for mobile telecommunications is ‘Okamura-Hata’. More specific studies have been performed to investigate specific clutter and terrain such as dense-urban and urban environments. Resulting from these are propagation models for specific clutter types.  Coverage Planning Tools  Radio planning engineers plan cellular networks using highly sophisticated computer programs that incorporate the above propagation models. Armed with data on cell site location, cell site configuration, maps, terrain etc they are used to predict areas of coverage deficiency (so called ‘coverage holes’), new site requirements and configurations.  Network Changes  Over time the topography and clutter in an area is subject to change. For example, building developments, housing and tree growth can all change. As a consequence the signals received from local phone masts can degrade, as they are dependent on these factors. These reasons along with customer complaints, network consolidation (mast sharing) and new technologies (4G) require a re-evaluation of a network operator’s telecommunications infrastructure.  Mast sharing can result in some masts no longer being needed. As a result they are decommissioned and physically removed.  Technical surveys undertaken for reasons above may highlight that antenna height increases are required – this is more likely for sites with low antenna heights around 15m AGL, particularly street furniture sites. More details on these reasons below.  While thus far this document is generic to mobile telephony masts it should be noted that each mast has to be dealt with on a case-by-case basis.  Site Height increases  There are a number of reasons why an operator may request a height increase on existing structures. The main ones are described below.  Maintaining existing coverage  The antennas inside, for example, street furniture sites are generally of 2 physical build designs – ‘Single Stack’ and ‘Dual Stack’. The former describes when the set of antennas are all at the same height. The latter describes a site with 2 sets of antennas one above the other.  The ‘Dual Stack’ is by far the preferred option. This is due to a number of factors including greater flexibility & control for different technologies and providing optimum service performance to customers.  Clutter changes  A more extreme example is when the local clutter or tree lines have changed, or are such that the mobile signals are blocked, resulting in lower quality calls and downloads for mobile device users. To provide sufficient services to customers height increases on existing masts or additional new masts are required. The former is the preferred option in many cases.  ICNIRP Compliance  The addition of new technologies and mast sharing affects ICNIRP compliance – a higher minimum mast height is required in some cases |

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

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| Type of Structure | | |
| Description:  **Tower Details:**  11.00m High ALPHA 8 Monopole on new D9-4 root foundation.  Material: Steel  Colour: Black    **Cabinet Details:**  1No. BTS 3900A (stacked) on 200mm high plinth on root foundation.  Dimensions: 600 x 480 x 1600 High  Material: Steel  Colour: Black  1No. MK4 Link/AC Cabinet on root foundation.  Dimensions: 600 x 500 x 1520 High  Material: Steel  Colour: Black  **Proposed Works**   * Install new MK4 Link/AC Cabinet on new root foundation. * Install new incoming Power and Transmission supply to equipment. * Install new BTS3900A (stacked) on new root foundation and connect to Power/Transmission. * Install new 11.00m ALPHA8 Monopole on new D9-4 root foundation. * New REC Power Supply and Transmission to be brought to site by local service provider. | | |
| Overall Height: 11.00m AGL | | |
| Height of existing building | | N/A |
| Equipment Housing: | | |
| Length: | | See drawings |
| Width: | | See drawings |
| Height: | | See drawings |
| Materials | | |
| Tower/mast etc – type of material and external colour: | 11.00m High ALPHA 8 Monopole on new D9-4 root foundation. Material: Steel Colour: Black | |
| Equipment housing – type of material and external colour: | 1No. BTS 3900A (stacked) on 200mm high plinth on root foundation. Dimensions: 600 x 480 x 1600, High Material: Steel, Colour: Black  1No. MK4 Link/AC Cabinet on root foundation. Dimensions: 600 x 500 x 1520 High, Material: Steel, Colour: Black | |

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| Reasons for choice of design: |
| The proposed installation is an EE Ltd and H3G LTE Phase 11.00m High ALPHA 8 Monopole 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. |

1. Technical Information

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| ICNIRP Declaration attached  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. | Yes |  |

1. Technical Justification

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| Reason(s) why site required |
| 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.  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.  The site is required to provide new 3G and 4G coverage for EE Ltd in order to improve coverage in the N1C area of Kings Cross. 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.  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. |

1. Site Selection Process

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| 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:   1. Mast and Site Sharing 2. Existing Buildings Structures 3. 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. |

D1 – York Central, York Way – Rooftop NGR: E 530356 N 183374 – WHP spoke to the managing agent Rita Nalliah at HML Hawksworth and discussed the possibility of installing telco equipment on the building. This was firmly rebuffed by the SP.

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 was drawn up by WHP as a 12.5m 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.

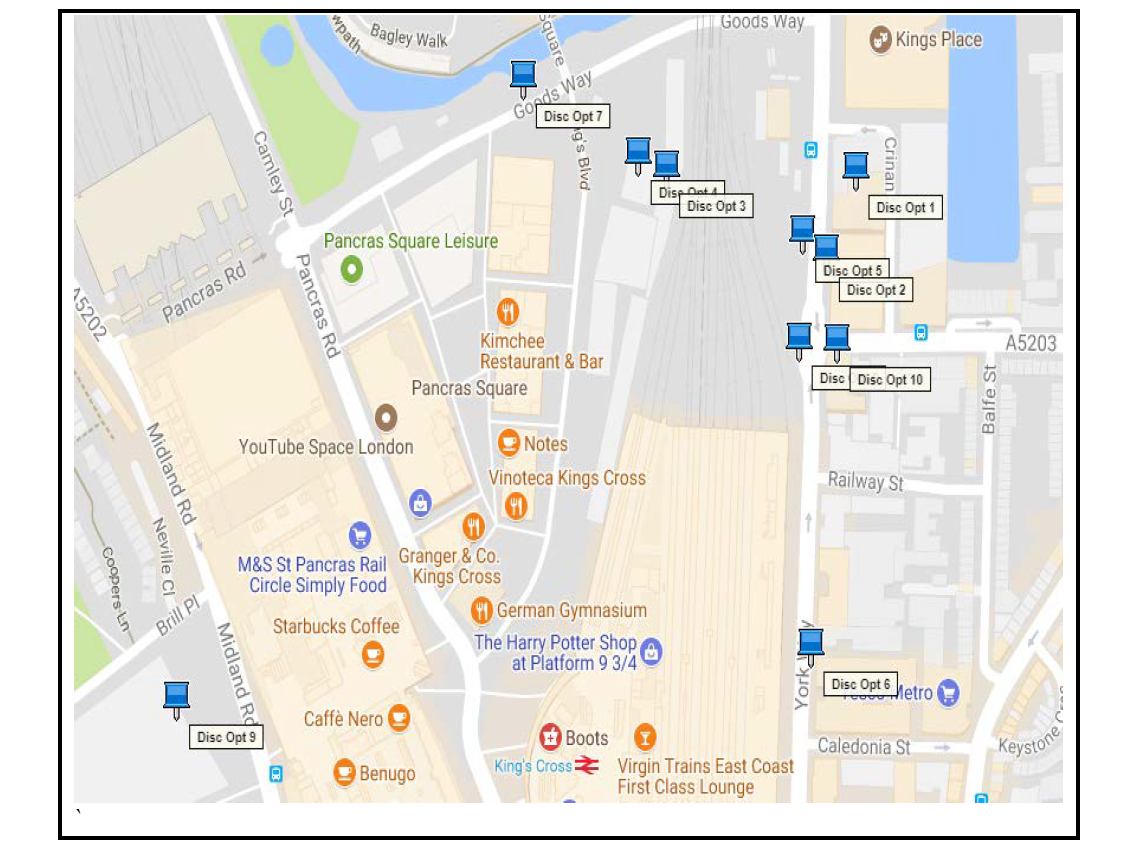
D7 – SW Site on Goods Way, Kings Cross, London, N1C 4AG NGR: 530146, N183415 – Any location on Goods Way is either on a bridge and thus cannot be constructed or the signal would be blocked by the tall new buildings on the road

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.

**Discounted Options Map:**



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

1. Additional Relevant Information

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| 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 Kings Cross specifically in this instance to enhance 3G and 4G coverage levels and network capacity within the N1C 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.  Damian Hosker BA(Hons) MA MRTPI  [d.hosker@w](mailto:d.hosker@w)hptelecoms.com  07771527070 |

Contact Details

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| --- | --- | --- | --- |
| Name: (Agent) | Damian Hosker BA(Hons) MA MRTPI | Telephone: | 01132583565  07771527070 |
| Operator: | EE and H3G LTE | Fax no: | N/A |
| Address: | WHP  Ponderosa Scotland Lane  Horsforth  Leeds  LS18 5SF | Email Address: | [d.hosker@w](mailto:d.hosker@w)hptelecoms.com |
|  |  |  |  |
| Signed: |  | Date: | 19th September 2019 |
| Position: | Planning Manager | Company:  (on behalf of above operator) | WHP |