

# PLANNING AND HERITAGE STATEMENT

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**APPLICATION FOR FULL PLANNING AND LISTED  
BUILDING CONSENT BY AN ELECTRONIC  
COMMUNICATIONS CODE OPERATOR**

**PLANNING AND HERITAGE STATEMENT**

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**ON BEHALF OF NET COVERAGE SOLUTIONS AND CORNERSTONE  
(TELEFONICA AND VODAFONE)**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004  
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990**

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## 1. INTRODUCTION

- 1.1 This Planning Statement supports an application for full planning and listed building consent for an electronic communications code operator and has been prepared by Pegasus Group on behalf of NET Coverage Solutions and Cornerstone (Telefonica and Vodafone) (joint applicants). The application relates to Africa House, 70 Kingsway, London, WC2B 6AH. A Site Location Plan is provided at Appendix 1.

### APPENDIX 1 – SITE LOCATION PLAN

- 1.2 The description of development listed on the application form is for the:

*"Development of telecommunications equipment to include 6no. antennas, 2no. cabinets, ancillary radio equipment together with fixtures and fittings."*

- 1.3 This document describes the application site, the detailed parameters of the proposal and clarifies the process that has led to the development proposal. The responsibilities and ownerships of the joint applicants will also be made clear. This statement provides the necessary background and justification for the technical requirement for an installation at Africa House, in the context of planning policy and other relevant material considerations.
- 1.4 This site forms part of a wider national project by Cornerstone (Telefonica and Vodafone) to provide improved coverage to all areas of the UK, particularly urban areas where network demand and usage is acutely high. The requirement for the proposed site at Africa House has arisen due to the planned decommissioning of a near by existing site at 103 Kingsway.
- 1.5 There are a number of relevant policy and material considerations, alongside commitments by mobile operators in the form of the Telecommunication Operators Code of Best Practice 2016<sup>1</sup>, that are required to be addressed during the development of new infrastructure. This statement summarises the relevant legislation and demonstrates how this development proposal complies with these requirements.
- 1.6 In order to establish that the chosen site is the optimum solution for radio coverage, and that the proposal minimises visual impact and is acceptable in policy terms a

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<sup>1</sup> <http://www.mobileuk.org/cms-assets/documents/259876-147086.code-of-best-practice-2016-edition-pub>

number of key factors have been taken into account. These include the technical requirements for the installation, community consultation to date, searches for alternative sites and the specific site location. These factors combined meet the various legislative and policy requirements and demonstrate the need and suitability of the chosen site.

- 1.7 The spectrum licences sold by Ofcom for 4G included targets for 98% of the British population to have access to a 4G network. The data requirements of 4G demand not only signal coverage, but improved capacity as well, in order to provide better and faster modern data intensive communications to areas that do not have the infrastructure to support efficient network coverage. To achieve the indoor and outdoor coverage and capacity goals set by Ofcom, new structures such as this installation are required closer to areas identified as having poor coverage.

## **2. THE APPLICATION SITE AND WIDER CONTEXT**

- 2.1 This section describes the application site and how it relates to its wider context. Centred at Grid Reference E: 350581, N: 181474, the application site is comprised of parts of the roof of Arica House where four small parcels of roof space are required to deliver the proposed equipment.
- 2.2 Africa House is a mixed-use office block with retail units situated at ground floor level. The building is Grade II listed and is situated within the Bloomsbury Conservation Area. It is noted that the adjacent Roman Catholic Church of St Anselm and St Cecilia is also Grade II listed.
- 2.3 Africa House is a substantial building, being 36m to roof level and occupying a prominent position on Kingsway. The building is ground floor plus eight stories, the topmost being positioned within a set back mansard roof. Equipment installed at rooftop level comprises ventilation and extraction equipment and rooflights. There is no general access to roof level from within the building. The below photograph shows Africa House from Kingsway with the viewpoint orientated upward, toward the rooftop level where the proposed installation is location.



**Photograph of the Application site**

- 2.4 A recent site visit has established that there is no existing telecommunications equipment situated at rooftop level.

- 2.5 The entire site is within the administrative area of London Borough of Camden. Beyond the heritage designations already identified, there are no other specific planning designations across the site.
- 2.6 A review of London Borough of Camden's online planning records shows that there are a number of relevant planning applications to the site. These include:
- Application 2016/2773/P for the installation of 2 x pole-mounted radio antennas at roof level (granted June 2016); and
  - Application 2015/3125/P for the installation of a satellite dish at roof level (granted June 2015).

#### Existing Surrounding Telecommunications Structures

- 2.7 The application site is situated within a dense urban setting. Accordingly, there are numerous existing telecommunications installations in the surrounds, each designed to serve a relatively small area where demands on the network are high. It is not uncommon for telecommunications installations to be sited very close in urban areas, sometimes as little as 50m apart. In simple terms, the higher the demand on the network on any given installation, the smaller the geographic area any given installation is capable of serving.
- 2.8 There are a number of web-based mapping search facilities, including Ofcom's 'UK Mobile Sitefinder' and 'MastData' that show the location of existing telecommunications installations within any given area. Beyond the existing site at 103 Kingsway that will be decommissioned shortly, there are no Cornerstone base station installations within a 100m radius of the site (installed outdoors and not serving the London Underground). There are no existing free-standing radio masts within the immediate vicinity.

### **3. THE PROPOSED TELECOMMUNICATIONS INSTALLATION**

- 3.1 This section sets out a detailed explanation of the of the proposal. The development proposal has materialised due to the technical requirement on behalf of the operator, Cornerstone (Telefonica and Vodafone), to maintain and provide an uplift in network coverage within a dense urban area that will suffer a dramatic decline in coverage upon the planned decommissioning of a nearby site at 103 Kingsway.

#### Summary

- 3.2 The proposal seeks planning permission and listed building consent for the erection of antennas, cabinets and ancillary equipment at rooftop level.

#### Telecommunication Proposal

- 3.3 The technical apparatus necessary as part of the Cornerstone coverage requirement consists of 6no. antennas, each installed on a tripod. 2no. equipment cabinets will be installed on a steel grillage. Ancillary radio equipment will also be installed including communication dishes, RRH modules and ERS modules.
- 3.4 The antennas, when taken by themselves, will measure 5.1m in height. However, due to the parapet nature of the roof, only the top 3m of the antennas would protrude above the existing building line. The antennas are positioned at the north west, south west and eastern part of the roof where each antenna tripod is orientated to provide an uplift in coverage in a specific direction. The north and south western tripods are set back 6m from the principle façade of the building. The eastern tripod is set back 6m from the eastern façade of the building. The cabinets and associated steel grillage are set back 9m from the principle façade of the building.
- 3.5 The ICNIRP certificate that accompanies this submission demonstrates that the proposal meets International Commission guidelines for public exposure as required by the NPPF. This is also appended to this statement.

### **APPENDIX 2 – ICNIRP CERTIFICATE**



#### **4. PLANNING POLICY**

4.1 In this section, national and local planning policy guidance pertinent to the application site and development proposal are identified. The plan-led approach to development, as enshrined by Section 38 (6) of the Planning and Compulsory Purchase Act 2004, requires development proposals to accord with the adopted development plan unless material considerations indicate otherwise.

4.2 The Development Plan relevant to this proposal comprises:

- Camden Local Plan (2017);
- Camden Planning Guidance relating to Design, Amenity and Digital Infrastructure; and
- London Plan (March 2016).

4.3 The relevant National Policy Guidance and other material considerations include:

- National Planning Policy Framework (NPPF) (July 2018);

#### **The Development Plan**

##### Camden Local Plan (2017)

4.4 Policy D1 of the Camden Local Plan seeks to secure high quality design in development; specifically requiring development to respect local context and character; preserve or enhance the historic environment and heritage assets in accordance with Policy D2 as well as preserve strategic and local views.

4.5 Policy D2 states that the Council will seek to protect heritage assets and non-designated heritage assets, the effect of the proposal on the significance of a non-designated heritage asset will be weighed against the public benefits on the proposal. Policies D1 and D2 are supported by the Council's Design CPG and Digital Infrastructure CPG.

### London Plan (2016)

- 4.6 Whilst there is no specific telecommunications policy within the London Plan, there is broad support for maintaining and enhancing communications network to ensure economic growth within the city can be supported.

### **Material Considerations**

### National Planning Policy Framework 2019

- 4.7 The National Planning Policy Framework (NPPF) was published in February 2019 and seeks to simplify national planning policy and promote sustainable economic growth. This forms the national planning policy against which this proposal should be assessed.
- 4.8 **Paragraph 8** of the Framework identifies the three dimensions to sustainable development. These are economic, social and environmental considerations. These dimensions give rise to the need for the planning system to perform a number of roles (inter alia): -

- **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;
- **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
- **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, use natural resources prudently, minimise waste and pollution, and mitigate and adapting to climate change, including moving to a low carbon economy.

- 4.9 One of the core planning principles contained within the NPPF is the need to proactively drive and support sustainable economic development in order to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Section 10 focuses on supporting high quality communications.
- 4.10 **Paragraph 112** of the NPPF states that the development of high quality and reliable communications infrastructure is essential for economic growth and social well-being. The NPPF states that local planning authorities should support the expansion of electronic communications networks, including telecommunications. The proposal will provide vital high-speed mobile broadband and multimedia technology communication networks to local residents and businesses in their homes and businesses, and to people passing through dependent upon their mobile phones.
- 4.11 The NPPF stresses that local planning authorities should aim to keep the number of masts and installations to a minimum consistent with the efficient operation of the network. **Paragraph 114** states that local planning authorities should not impose a ban on new telecommunications development in certain areas or insist on minimum distances between new telecommunications development and existing development. It goes on to state that LPAs must have evidence to demonstrate that the proposed installation will not interfere other electronic equipment and air traffic services, and that they have considered any impacts from other new buildings or structures
- 4.12 **Paragraph 115** insists that as part of a planning application for a new mast, applicants should provide supporting information which includes the outcome of consultations with organisations with an interest in the proposed development, demonstrates that they have explored the possibility of erecting antennas on existing buildings, masts or other structures and that they submit a statement that self certifies that International Commission guidelines for safety are met by the proposed installation. Justification of the proposal against **Paragraph 115** is provided in the following section of this statement.
- 4.13 **Paragraph 116** confirms that local planning authorities must determine applications on planning grounds and should not question the need for the telecommunications system or determine health safeguards if the proposal meets International Commission Guidelines for public exposure.

## **5. PRE-APPLICATION CONSULTATION (CODE OF BEST PRACTICE)**

- 5.1 This section sets out details of the pre-application discussions and assessments that have taken place prior to the submission of the application.
- 5.2 The Telecommunication Operator Code of Best Practice on Mobile Development in England, published November 2016, sets out best practice for pre-application consultations for development proposals that include the installation of new and upgraded electronic communications base stations, such as the proposed development. In accordance with that Code, the applicants provided the local planning authority with a description of the proposed development and a set of plans, inviting feedback.
- 5.3 This is supported in the NPPF where paragraph 115 sets out that mobile operators and infrastructure providers should provide supporting information which includes the outcome of consultations with organisations with an interest in the proposed development
- 5.4 The Code of Best Practice sets out advice on how telecommunication code system operators should approach pre-application consultation with the general public. Depending on a traffic light rating of the site, different levels of pre-application consultation are recommended. In this case, the installation of the telecommunications equipment has been assessed as 'green' given the site location atop an existing mixed-use office block. The Code of Best Practice stresses that a rating of green does not mean the proposal should not be progressed. Rather, it simply indicates a higher level of public consultation may be needed prior to submission of the planning application.
- 5.5 In this case, the applicant has written to the local MP and Ward Councillors. In addition, a letter was sent to the Council's planning department seeking pre-application comment. At the time of writing no response has been received. A copy of the letter is provided at Appendix 3.

### **APPENDIX 3 – LPA PRE-APPLICATION CONSULTATION LETTER**

#### Responses

- 5.6 No responses were received for any of the pre-application consultation documents released.

## 6. PLANNING ASSESSMENT

6.1 The previous sections of this statement have identified the relevant planning policy and parameters of the proposed development. Therefore, in order to demonstrate that the site is acceptable in planning terms, the following matters are considered:

- A technical consideration of the proposal and the need for telecommunications equipment in the proposed location;
- Details of the search for alternative sites, including the possibility of mast sharing, use of existing buildings or other structures and the upgrade of existing installations;
- Compliance with International Commission on Non-Ionizing Radiation Protection (ICNIRP);
- Whether the appearance of the telecommunication equipment would have a harmful impact on the visual amenities of the surrounding area;
- Impact on designated heritage assets; and
- The material benefits of the scheme.

### Technical consideration of the proposal and the need for telecommunications equipment in the proposed location

6.2 This application is driven by the requirement of Cornerstone to improve network coverage and capacity in the immediate geographic area surrounding the proposal site.

6.3 Africa House is intended as replacement of existing cell site at 103 Kingsway, which is being removed as part of a redevelopment project being progressed by the landlord. Firstly, without any replacement site the operator will lose indoor coverage in very busy Holborn area along Kingsway and Whetsone Park. This is central area around Holborn station, hosting hotels, businesses and London School of Economics. Secondly, the operator will greatly lose capacity, making nearby cell sites (especially Holborn Tower) struggling to cope with mobile broadband demand. Thirdly, the operator won't be able to efficiently deploy new 5G coverage.

6.4 Africa House was selected mainly for its distinct height over surrounding clutter, making it ideal candidate for cell site (with unobstructed 360 degree coverage).

The proposal site is opposite the existing cell site, therefore aiming to maintain similar coverage footprint. Also it is one of the few buildings with spacious flat rooftop which is essential for the deployment of telecommunications equipment. Lastly, Africa House is not too close to any of existing cell sites in area, which otherwise would bring a whole new set of problems.

- 6.5 Radio coverage plots are provided at Appendix 4 that thematically show the existing and proposed scenarios across the Cornerstone network that would result should the proposed scheme proceed to construction. The plots show that the existing situation is good, where the majority of all of the surrounding area benefits from the highest levels of coverage. A plot is provided showing the theoretical scenario that would result when the existing site at 103 Kingsway is decommissioned. As shown, a concentrated part of the area surrounding the decommissioned site would see a decline in coverage. Although this area is relatively small in size, it must be remembered that the number of users in this dense urban environment is significant and amongst the highest in the country. The final plot provided shows that the proposed development would effectively replace the coverage lost by the decommissioned site.

#### APPENDIX 4 – RADIO COVERAGE PLOTS

- 6.6 The plots show various levels of coverage ranging from 'outdoor' (the poorest level above nil coverage) and 'dense urban' (the highest level). Users benefiting from dense urban coverage could expect the highest data transfer rates whilst inside a building with no drop off in service. Outdoor levels of coverage mean that the network could only be accessed sporadically whilst outside and handsets could not effectively perform the functions for which they are designed.
- 6.7 The proposed plots show a demonstrable benefit of the proposed development where large parts of the surrounding area will benefit from the highest levels of service coverage. This is a significant benefit of the scheme that should weigh heavily in favour of granting planning permission.

Details of the search for alternative sites, including the possibility of mast sharing, use of existing buildings or other structures and the upgrade of existing installations:

- 6.8 It is acknowledged by the applicant that new telecommunications facilities can be installed in a variety of places, using a variety of construction techniques. This must be balanced with the specific geographic requirements of Cornerstone. The

parameters of the project mean that the 'cell search' area, the area where a telecoms installation could technically serve the surrounds is limited.

#### *Cell Search Area*

- 6.9 The optimal cell search area has been provided by Cornerstone radio planners and is the area within which a new site could effectively maintain the coverage provided by the site which is due to be decommissioned. The cell search area is focused on an area where coverage is lacking on the basis that a new installation within this area would result in an efficient expansion of the telecommunications network. Outside of dense urban areas Telecoms installations are normally able to provide coverage over a relatively wide area, generally about 500m in radius from any given installation. However, due to the specific issues affecting dense urban areas the area where a newly deployed site could cover the 'cell area is extremely limited. The 'cell search' area reflects these limitations. In this instance, the cell search area is the immediate area around 103 Kingsway, the site to be decommissioned.

#### *Alternative Sites*

- 6.10 In order to show how each of these alternative possibilities have been considered and discounted, the following categories are used:
- Possibility of mast sharing and upgrade of existing masts;
  - Use of existing buildings or other structures; and
  - Other new installations (including installations with planning permission).

#### *Site Search Methodology*

- 6.11 Following the identification of a cell area, Telefonica and Vodafone radio planners and NET acquisition surveyors undertake a desktop analysis to identify the best way of meeting the coverage requirement.
- 6.12 The desktop search identifies other operators' existing telecommunications installations. This interrogation of databases ensures any mast-sharing opportunities are identified and maximised where possible. Where available, Local Planning Authority mast registers are also reviewed. The London Borough of Camden does not hold an up to date register.

- 6.13 The radio planner defines a cell search area as described above, which is then issued to an acquisition agent who undertakes a detailed ground search with the radio planner to identify suitable options. This could be existing buildings or masts, as well as, new greenfield structures. In this case, the target area encompasses the immediate area surrounding track to the south of the site.
- 6.14 The acquisition agent will obtain site-specific details to identify those sites that are viable options. The possible options are short-listed according to those that combine location within the search area; a willing landlord with acceptable commercial terms; adherence to planning and environmental policy; and other site-specific issues such as access to a suitable power supply. These options are then returned to the radio planners for a computer modelling assessment, taking into account the ground height, potential available antenna height and surrounding obstructions such as trees, buildings, cuttings and tunnels.
- 6.15 A site survey is conducted to provide a full structural analysis of the site including confirming power routes and how the site will be linked into the network. A site visit is then undertaken by a qualified town planning agent to assess whether the site will be acceptable in planning terms. Terms with the landlord are then finalised, detailed plans prepared, and the application progressed to submission.
- 6.16 The above methodology outlines the long-term procurement process involved in progressing new telecommunications sites. A number of important key factors must align before any site is progressed making the prospects of finding sites difficult and often long-term.
- 6.17 The following provides an explanation of the lengths the applicant has explored with regard to site selection and alternative sites. The scope of the applicant's assessment has considered the surrounding designations as well as existing masts and other buildings in the surrounds. The below table provides detail of the consideration of alternative sites.

Location	Site	Reason for discounting
1	99-103 Kingsway, Holborn, London WC2B 6QX	This is the site which is due to be decommissioned and is not a viable site.



2	16 Great Queen St, Holborn, London WC2B 5DG	The acquisition surveyor has identified that the rooftop level of this site is extremely cluttered and would not have sufficient space to accommodate the proposed equipment. In addition, large parts of the roof area are too low to provide effective radio propagation.
3	77 Kingsway, Holborn, London WC2B 6ST	The acquisition surveyor has identified that the rooftop level of this site is extremely cluttered and would not have sufficient space to accommodate the proposed equipment. Also, the site is too far south to provide effective coverage to the cell area.
4	58 Kingsway, Holborn, London WC2B 6DX	Radio planners have assessed that this site is not suitable from a radio perspective to provide the required replacement coverage.
5	60 Kingsway, Holborn, London WC2B 6DS	The height of the rooftop is too low to provide effective radio coverage and the site has been discounted on this basis.
6	88 Kingsway, Holborn, London WC2B 6AA	Surrounding built form would prevent effective radio propagation from this site. It would not be possible to position antennas above the height of surrounding clutter and the site has been discounted on this basis.
7	129-133 Kingsway, Holborn, London WC2B 6PP	Part listed, difficult to design due to window cleaning rail. Would probably need to be taller than parapet and hence visible down High Holborn and Southampton Row.

**Table 1: Alternative Site Search**

Compliance with International Commission on Non-Ionizing Radiation Protection (ICNIRP)

- 6.18 The ICNIRP certificate provided at Appendix 2 demonstrates that the proposal fully meets International Commission guidelines for public exposure.
- 6.19 ICNIRP compliance is required under NPPF paragraph 115 (bullet 3). Appendix 3 demonstrates that the proposed telecommunications installation is fully compliant with Government adopted ICNIRP Guidelines.

- 6.20 Paragraph 116 of the NPPF states that Local Planning Authorities should not determine an application on health grounds if the proposal meets International Commission guidelines for public exposure.

Whether the Height and Form of the Telecommunication Equipment would have a Harmful Impact on the Visual Amenities of the Surrounding Area

- 6.21 The installation has been arranged to provide the requisite signal coverage requirements in the most discreet form possible. Every effort has been made by the design team to site the antennas as far back from the edge of the roof whilst maintaining the effectiveness of the antennas themselves. The antennas are situated at roof level and will be visible from only a relatively small area around the base of Africa House. Consequently, the impact on the setting of the conservation area will be to a negligible degree and will accord with Local Plan policy that requires the setting of the conservation area and listed building to be conserved.

Impact on Designated Heritage Assets

- 6.22 The Impact on designated heritage assets has been considered in terms of the impact upon the setting of the listed building and also upon the setting of the wider conservation area. The equipment installed will be at a relatively low level atop a substantial building. Therefore, any views of the equipment will be limited within the wider surrounds and users of the street scene would have to look up at the roof of the building to notice the equipment at all. Also, given the equipment is spread out across the roof level it is extremely unlikely that all of the equipment could be viewed simultaneously meaning only a small proportion of the equipment would be viewed at any given time.
- 6.23 On this basis, the application will cause a negligible degree of harm to designated heritage assets which are clearly outweighed by the public benefits of the scheme as detailed within this Planning and Heritage Statement.

The material benefits of the scheme

- 6.24 The public benefits of the scheme are set out on more detail in the supporting enclosure '*General Background Information for Telecommunications Development*' that forms part of this application.
- 6.25 Reflecting on the wider benefits of the proposal these can be broken down into each of the aspects of sustainable development as set in the NPPF:

- **Economic Benefits** – modern communications in all of their different and emerging forms, including mobile communications, help maintain high and stable levels of economic growth and employment. The contribution to the national economy is also significant where all businesses, from large to small, benefit from modern communications. This proposal will improve the ability of local businesses to operate and compete effectively through access to modern communications thereby helping to maintain and increase local employment opportunities.
- **Social Benefits** - modern communications, including mobile communications, aid social progress, which recognises the needs of everyone. Connecting to the Internet via a mobile device allows people to access a wide range of central and local government services. Mobile devices enable flexible forms of working that provide opportunities to working parents or carers and help them achieve a better work life balance with both family and community benefits. By providing means of communication that improve convenience and enhance personal safety and security. This is especially important to vulnerable groups who may otherwise feel unable to participate in certain activities.
- **Environmental Benefits** - modern communications, including mobile communications, provide effective protection of the environment by helping reduce the need to travel by enabling modern working practices such as greater home working. Such practices alleviate the pressure for new commercial development such as offices, through more efficient and flexible use of existing accommodation. For the same reasons, modern communications, including mobile communications, help ensure the prudent use of natural resources.

## **7. DESIGN AND ACCESS**

7.1 In accordance with the Code of Best Practice on Mobile Network Development and published Government guidance, this proposal was drawn up having regard to the need for good design. In particular considerations for design and layout have been informed by the context, having regard for the neighbouring buildings and general townscape of the wider locality.

7.2 The scale, massing and height of the proposed antennas is proportionate to the existing building and other existing telecommunications equipment currently installed at roof level where the following design and access parameters have been used to formulate the plans:

- Use – The equipment will provide additional coverage to support the surrounding network. In addition with the advancement of technology and the increase of network communication speeds, this area along the Kingsway will need to catch up with the surrounding areas, otherwise it will be at an economic disadvantage contrary to the spirit of NPPF.
- Amount – the amount of equipment proposed is the minimal required to provide the uplift in coverage, 6no. antennas together with cabinets.
- Layout – The antennas are proposed to be installed at roof level up to 41.6m
- Scale – The antennas themselves are relatively modest in size, measuring 3m in height above the height of the parapet roof.
- Appearance – The antennas will not be overly visible when viewed from street level.
- Access – the development will not affect access to the site.

## 8. HERITAGE STATEMENT

### Africa House

- 8.1 Africa House forms part of the Hallfield Estate which was granted Grade II listed status in 2011. The below extract from the Historic England listing for the site sets down the reasons for the Grade II designation:

*"Includes: Nos.1-17 (ODD) GATE STREET. Large office block with shops at ground floor. 1921-2. By Trehearne and Norman. Portland stone faced steel frame. 6 storeys and 2 storey set back attic. 9 windows. Double height fluted Doric screen, with inset shops and bank, flanks a round-arched triumphal arch style entrance inscribed "Africa House" and surmounted by lions couchant. Upper storeys set back with central distyle-in-antis screen rising from 3rd to 5th floor; metal-framed windows, 5th floor with Greek scroll aprons and enrichment to heads of bays suggesting pilasters. Entablature with deep mutule cornice surmounted by a pediment of carved figures and animals. Plain attic storeys with cornice and blocking course having a central antefixa. Return to Twyford Place continues the design with a long screen."*

- 8.2 The roof of Africa House is not specifically mentioned within the listing as being an important contributing factor to the overall quality of the building or any specific architectural interest.

### Bloomsbury Conservation Area

- 8.3 The Council adopted the Bloomsbury Conservation Area Appraisal and Management Strategy in April 2011. There is no specific mention of Africa House within the document or any specific assessment of the immediate area surrounding the application site.
- 8.4 Paragraph 5.7 recognises that the increasing number of mobile phone users is leading to an increased demand by operators for telecommunications equipment where masts are frequently mounted on tall buildings and could potentially be prominent within the Conservation Area. In response to this, the applicant has designed a discreet proposal that will not be generally visible within the Conservation Area.

## **9. CONSTRUCTION METHOD STATEMENT**

- 9.1 As noted elsewhere, Africa House is a Grade II listed building. As such this planning application includes an application for listed building consent in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990. The applicant is aware of their responsibilities in respect of the listed building and that works proposed under this application must be carried out to the highest standards to conserve the built fabric and setting of the listed building.
- 9.2 The following Construction Method Statement is a list of the principles the developer will adhere to in carrying out the works which for the most part is envisaged as being non-invasive and, in some cases, fully reversible.

### Construction Method Statement

- The equipment at roof level will be transported to roof level via a crane which will be positioned in a car parking area at the base of the residential block. The precise position of the crane is to be agreed with Westminster Estates team prior to the construction phase of the development;
- The rooftop equipment will sit atop a steel grillage which will be secured to the roof via plinths which will penetrate the rooftop in a small number of places to provide the requisite structural strength;
- Proposed cabling within the building will penetrate walls and compartmental breaches at each floor through risers travelling the length of the building. Cabling will be in fire rated trunking and not impact on any other services;

## 10. CONCLUSIONS

- 10.1 This Planning and Heritage Statement has explained the proposed development, detailed applicable national and local planning policy and guidance and justified the proposal against these parameters. It has also discussed the significance of the heritage asset.
- 10.2 The proposal constitutes the installation of telecommunication antennas and associated equipment atop Africa House to provide maintained telecommunications coverage to the Cornerstone network that will suffer a dramatic decline in coverage with the decommissioning of a nearby site.
- 10.3 In accordance with paragraph 115 of the NPPF, evidence that the possibility of erecting antennas on an existing buildings, masts or other structures has been provided. Furthermore, the applicant has also undertaken pre-application consultation and has demonstrated that the proposal fully meets International Commission guidelines for public exposure.
- 10.4 Paragraph 116 of the NPPF states that LPAs should not question the need for new installations and the proposal complies with all relevant policies in the NPPF. The proposal includes numerous demonstrable benefits and would contribute towards the Government's long-standing and well-documented commitment to maintaining and improving communications networks across all the UK. This includes the provision of telecommunications antenna such as those proposed which will provide improved coverage in an area that is demonstrably deficient in this service. This is set out in more detail in the supporting enclosure '*The Benefits of Mobile Connectivity*'.
- 10.5 The equipment will be mostly screened from public view by virtue of their installation on the roof of a substantial building. These factors combine to result in a proposal that will have a limited impact on the visual amenities and the character of the area.
- 10.6 The NPPF confirms a presumption in favour of sustainable development and that social, economic and environmental issues must be balanced and integrated, at the same time, by the decision-taker when determining planning applications. Section 38(6) of the Act requires that decisions should be assessed against the Development Plan unless material considerations suggest otherwise. In this regard the application not only meets the ambitions of NPPF in improving

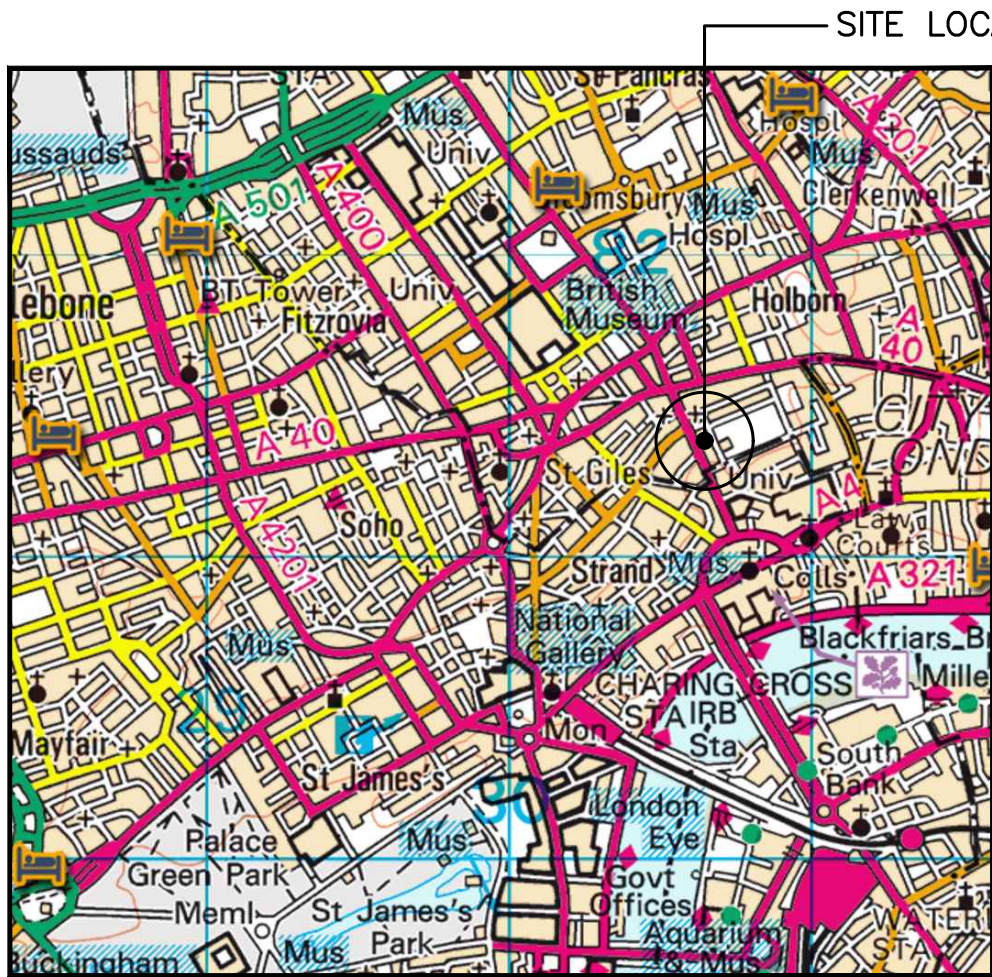
telecommunications networks but also accords with policies of the Local Plan. Advanced, high quality communications infrastructure is essential for sustainable economic growth and the application scheme will provide this in a location that is deficient in coverage.



## **APPENDIX 1**

### **SITE LOCATION PLAN**





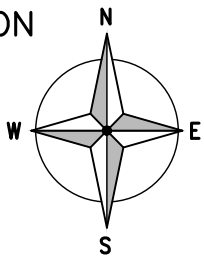
0 1km 2km  
SCALE 1:50000

SITE LOCATION  
(Scale 1:50000)



SITE PHOTOGRAPH

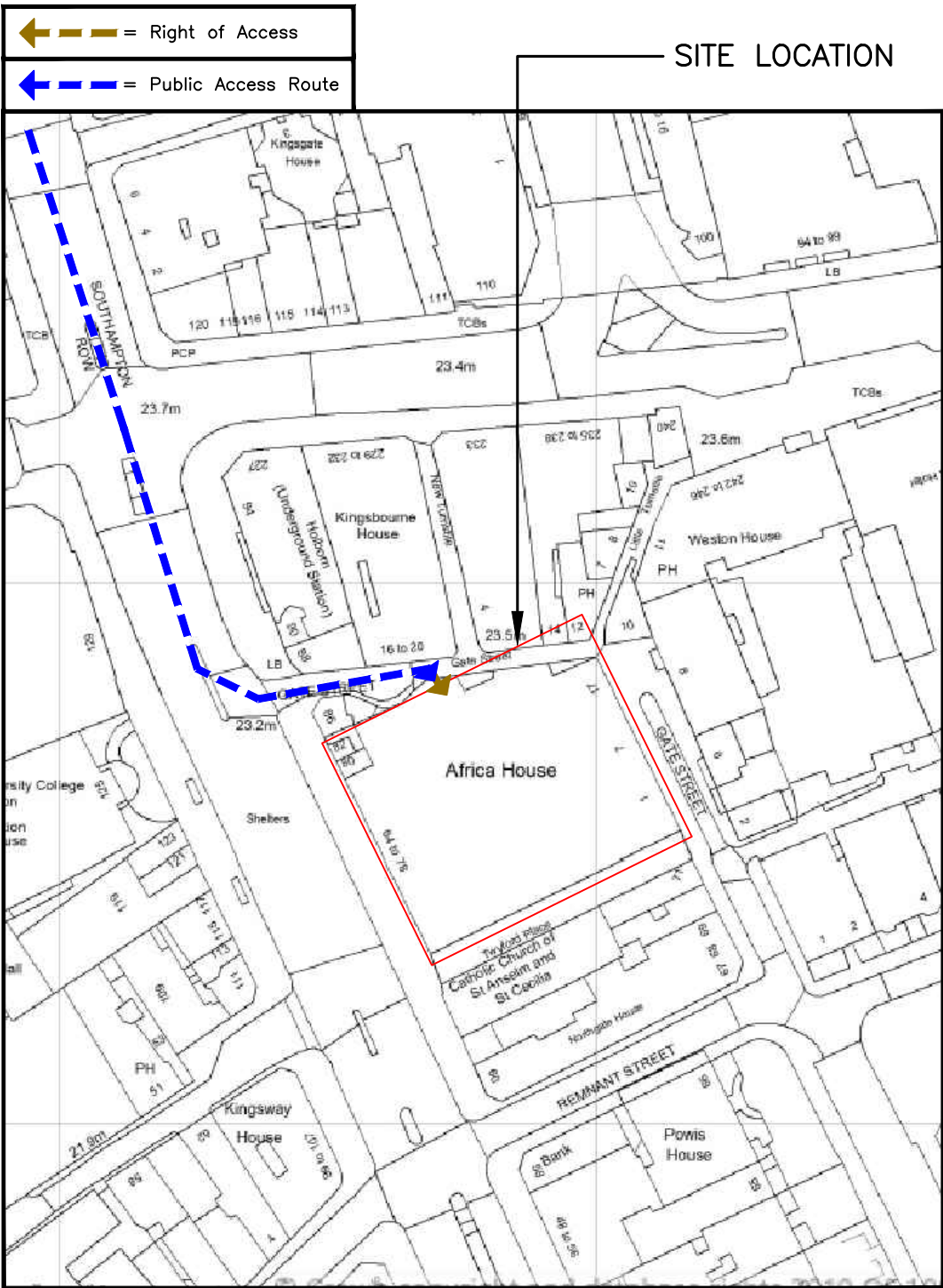
The drawings comply with TEF & Vodafone Standard ICNIRP guidelines.  
Designed in accordance with CORNERSTONE document: SDN0008



SITE LOCATION

181500

181400



DETAILED SITE LOCATION  
(Scale 1:1250)

0 50m 100m 150m  
SCALE 1:1250

ALL DIMENSIONS ARE IN mm UNLESS NOTED OTHERWISE

N.G.R | E: 530581 N: 181474

DIRECTIONS TO SITE: HEAD EAST ON M4 TOWARDS DORCHESTER GROVE/A316, AFTER 92ft TURN LEFT ONTO DORCHESTER FROVE/A316 AND CONTINUE TO FOLLOW A316, AFTER 0.5MILE TURN RIGHT ONTO CHISWICK HIGH RD/A315, AND THEN TURN LEFT AFTER 0.3MILES ONTO GOLDHAWK RD/A402, AFTER 0.2MILES AT THE ROUNDABOUT, TAKE THE 2nd EXIST AND STAY ON GOLDHAWK RD/A402, TAKE SLIGHT LEFT ONTO STEPHERD'S BUSH GREEN/A402/A4020, CONTINUE STRAIGHT TO STAY ON UXBRIDGE RD/A402/A4020, AFTER 456ft AT THE ROUNDABOUT, TAKE THE 1st EXIT ONTO W CROSS RTE/A3220, AFTER 0.8MILES AT THE ROUNDABOUT, TAKE THE 2ND EXIT ONTO THE A40 RAMP, AFTER 0.3MILES MERGE WITH WESTWAY/A40, TAKE THE EXIT TOWARD WEST END PADDINGTON, CONTINUE ONTO WESTBOURNE BRIDGE FOR 0.1MILES, CONTINUE ONTO WESTBOURNE TERRACE, TURN LEFT ONTO BISHOP'S BRIDGE RD/A4206, USE THE MIDDLE LANE TO TURN LEFT ONTO HARROW RD/A404, CONTINUE STRAIGHT TO STAY ON HARROW RD/A404, CONTINUE STRAIGHT ONTO MARYLEBONE RD/MARYLEBONE FLYOVER/A501 FOR 0.2MILES, CONTINUE STRAIGHT TO STAY ON MARYLEBONE RD/A501, AFTER 0.5MILES KEEP RIGHT TO CONTINUE ON EUSTON RD/A501, CONTINUE STRAIGHT TO STAY ON EUSTON RD/A501 FOR 0.1MILES, TURN RIGHT ONTO UPPER WOBURN PL/A4200, AFTER 0.9MILES USE ANY LANE TO TURN LEFT ONTO GATE ST

A	Issued for Approval	NVN	YD	07.08.19
REV	MODIFICATION	BY	CH	DATE



Cell Name	Opt.
AFRICA HOUSE	-

Cell ID No		
CORNERSTONE	TEF	VF
300360	-	17049

Site Address / Contact Details		
AFRICA HOUSE 70 KINGSWAY LONDON WC2B6AH		

Drawing Title:	SITE LOCATION MAPS	
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Purpose of issue:	PLANNING	Dwg Rev:
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Drawing Number:	100	A
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Surveyed By:	SA	Original Sheet Size:	A3	Pack Issue:
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Drawn:	NVN	Date:	07.08.19	Checked:	YD	Date:	07.08.19	A
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## **APPENDIX 2**

### **ICNIRP CERTIFICATE**



**Our ref: VF 17049**

**7 October 2019**

**Chief Planning Officer  
Camden Council  
2<sup>nd</sup> Floor  
5 Pancras Square  
c/o Town Hall  
Judd Street  
London  
WC1H 9JE**

Dear Sir/Madam

**CLARIFICATION OF THE DECLARATION OF ICNIRP COMPLIANCE ISSUED AS PART OF  
THE PLANNING APPLICATION ATTACHED FOR SITE CTIL 300360 AT AFRICA HOUSE, 70  
KINGSWAY, LONDON, WC2B 6AH**

I refer to the Declaration of Conformity with ICNIRP Public Exposure Guidelines ("ICNIRP Declaration"), sent with this application in relation to the proposed telecommunications installation as detailed above.

The "ICNIRP Declaration" certifies that the site is designed to be in full compliance with the requirements of the radio frequency (RF) guidelines of the International Commission on Non-Ionizing Radiation (ICNIRP) for public exposure as expressed in the EU Council recommendation of July 1999.

**This ICNIRP declaration takes into account the cumulative effect of the emissions from the proposed installation and all radio base stations present at, or near, the proposed location.**

The radio emission compliance calculation is based upon the maximum possible cumulative values.

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.

If you have any further enquiries concerning the "ICNIRP Declaration" certificate or anything else in this letter then please contact the CTIL EMF UNIT on 01753 564306.

Yours sincerely

A handwritten signature in black ink, appearing to be 'M. H.', written on a light-colored background.

PROJECT ENGINEER



Our ref: CTIL 300360

**Declaration of Conformity with ICNIRP Public Exposure Guidelines**  
**("ICNIRP Declaration")**

Vodafone UK Ltd  
The Connection  
Newbury  
Berkshire  
RG14 2FN

Declares that the proposed equipment and installation as detailed in the attached planning/GPDO application at;

Africa House  
70 Kingsway  
London  
WC2B 6AH

530581, 181474

is designed to be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionizing Radiation (ICNIRP), as expressed in the EU Council recommendation of 12 July 1999 \* "on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz)".

\* Reference: 1999/519/E

Date: 7 October 2019

Signed:

Name:

G.Duke

Position:

Project Engineer

## **APPENDIX 3**

### **LPA PRE-APPLICATION CONSULTATION LETTER**

AD/RM/P19-2550

10 October 2019

Planning Services  
Camden London Borough Council  
2<sup>nd</sup> floor  
5 Pancras Square  
Town Hall  
Judd Street  
London  
WC1H 9JE

Dear Sir/Madam

**Public Consultation for Proposed Telecommunications Structure at Africa House,  
70 Kingsway, London, WC2B 6AH**

Pegasus Group are working as Planning Consultants in partnership with NET Coverage Solutions Ltd, who are preparing a planning application for a telecommunication structure to be situated on top of the roof of Africa House, 70 Kingsway. The installation will improve network coverage in the local area for Vodafone customers.

This letter has been prepared to provide the local planning authority with some initial information about the proposal and to offer the opportunity to make comments or suggestions about the scheme during the design and development stage, before any planning application is submitted to the Council. The Equipment will be situated at roof level and comprises 6no. antennas, 3no. cabinets and assorted fixtures, fittings and ancillary radio equipment. The equipment has been sited to minimise views from the surrounding area and will be 3.5m tall to the top of any antenna. Draft drawings are enclosed with this letter for your reference.

NET Coverage Solutions Ltd is a multi-disciplinary company that specialise in the design, build and installation of mobile coverage solutions for mobile operators. This letter invites you to provide comments on the proposal in line with telecommunications best practice commitments prior to a formal planning submission.

The proposal will be fully compliant with standards set down by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). ICNIRP is an independent scientific organisation whose aim is to provide guidance and advice on the health implications of telecommunications development. These guidelines have the support of the UK Government and European Union as well as the formal backing of the World Health Organisation.

I look forward to receiving any comments you may have. Please endeavour to provide your suggestions within two weeks of the date of this letter, to ensure your input is taken into account during the design stage of the proposal.

**PLANNING | DESIGN | ENVIRONMENT | ECONOMICS**

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury | Bristol | BS32 4QL

**T** 01454 625945 | **F** 01454 618074 | **W** [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

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Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales  
Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT



In the meantime, if you require any additional information in respect of the above proposal, please do not hesitate to contact me either by the address on this letter, by email (below) or by telephone 01454 625 945.

Yours faithfully



**Richard Morison**  
**Principal Planner**  
**Email: [richard.morison@pegasusgroup.co.uk](mailto:richard.morison@pegasusgroup.co.uk)**

Encs

## **APPENDIX 4**

### **RADIO COVERAGE PLOTS**



# 17049 – Africa House

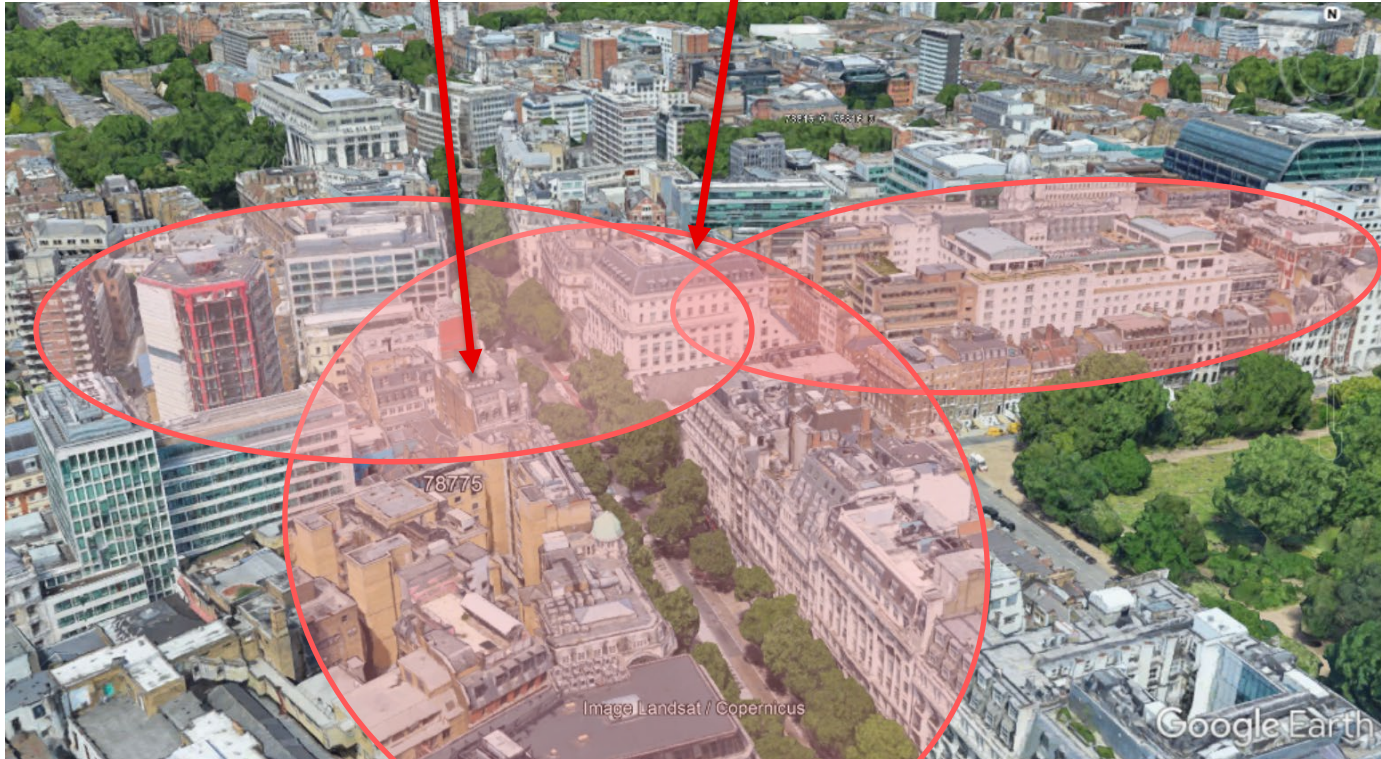
Coverage plots

Karel Rocejd  
October 2019



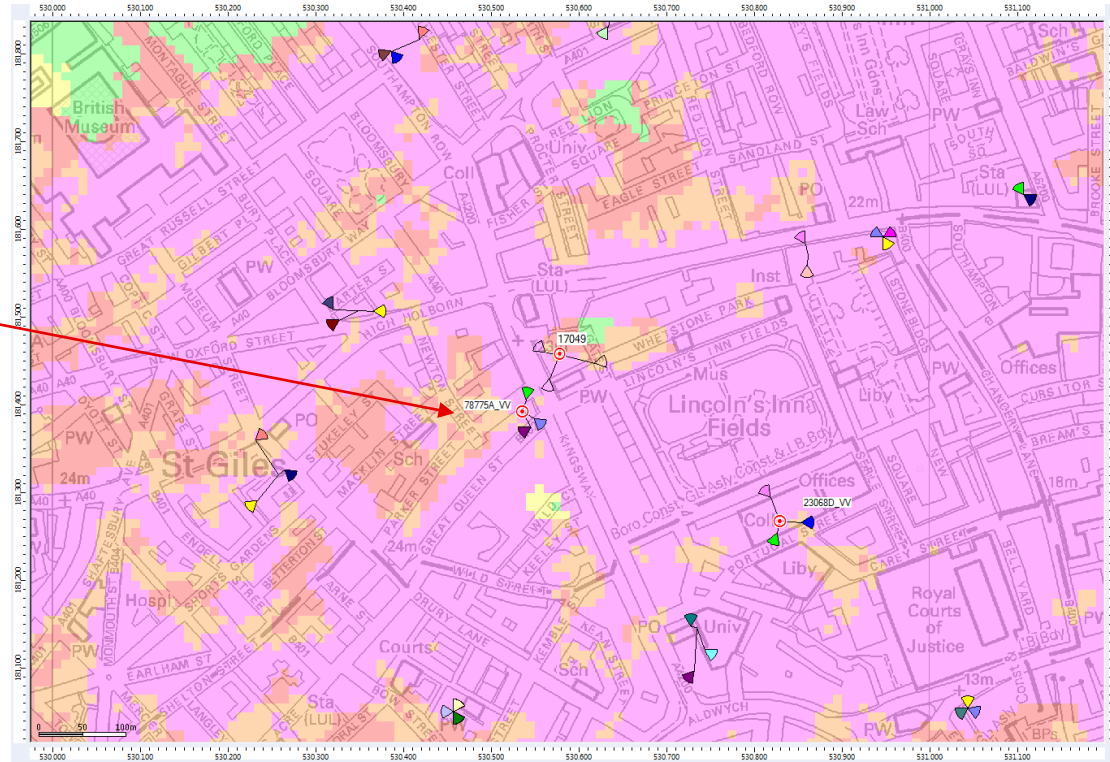
# Situation overview

Existing cell site 78775      Replacement cell site 17049



# 4G LTE 2100MHz – Mobile Broadband coverage

Existing cell site 78775



- LTE2100 Reception**
- Indoor coverage
    - Dense urban
    - Urban
    - Suburban
  - Outdoor coverage
    - In car/Rural
    - Outdoor

Figure 2: Existing LTE 2100MHz coverage



# 4G LTE 2100MHz – Mobile Broadband coverage

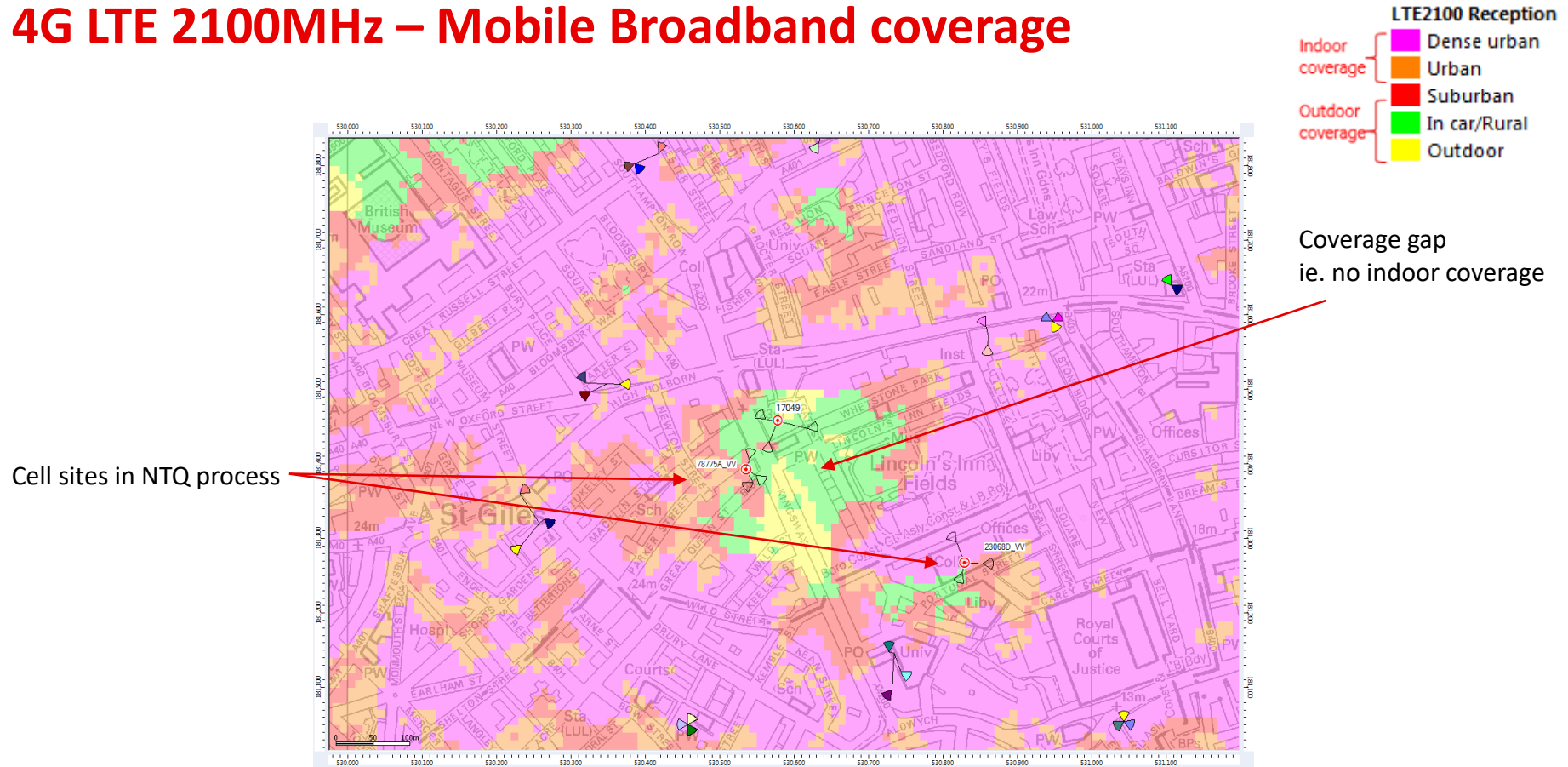


Figure 3: “outage” LTE 2100MHz coverage





# 4G LTE 2100MHz – Mobile Broadband coverage

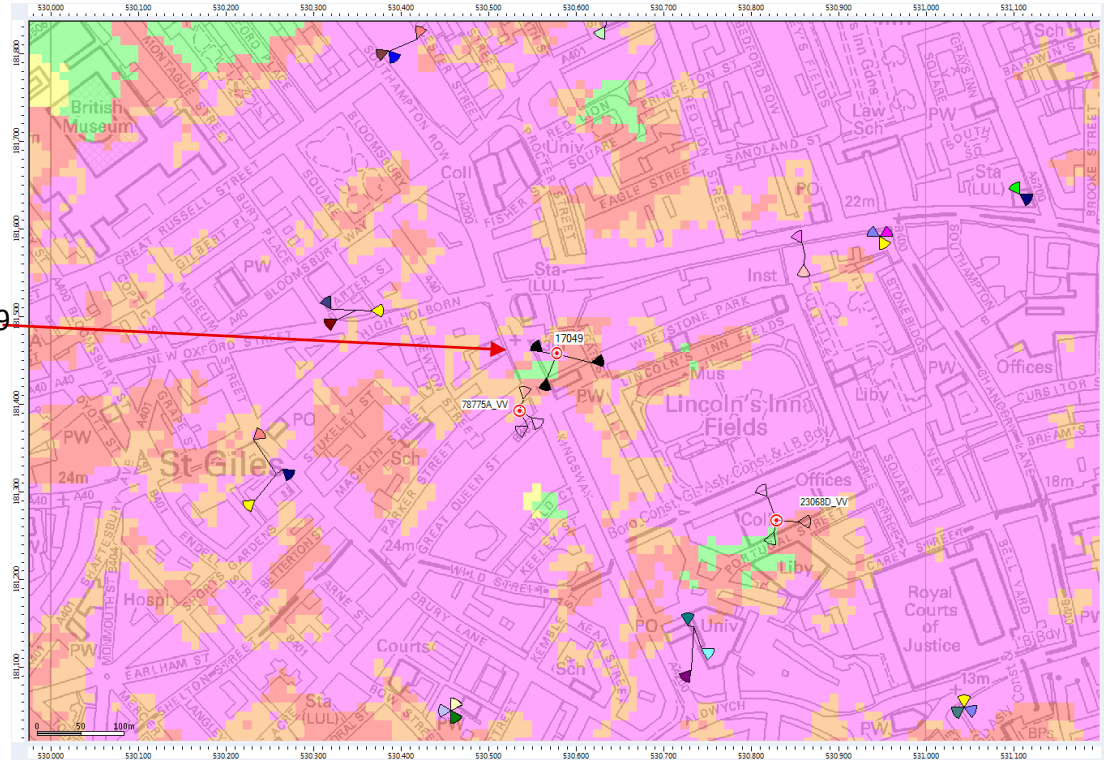
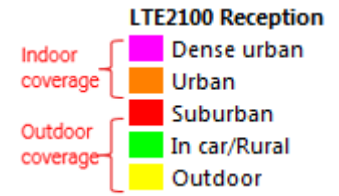


Figure 4: Proposed LTE 2100MHz coverage



**pegasusgroup.co.uk**

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Equinox North, Great Park Road,  
Almondsbury, Bristol, BS32 4QL

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**T** 01454 625 945