

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	St Pancras Way Temp	Site Address:	Land to rear of 6 St Pancras Way (accessed off Granary Street), London, NW1 0TB
National Grid Reference:	529700, 183734		
Site Ref Number:	CTIL 245278 VF 17047 O2 87499	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)


Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why: In the absence of a mast register, the applicant consulted the publicly available planning records in the area.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: N/A		

¹ Macro or Micro

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Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: As the development is for the retention of an existing temporary installation no pre-application consultation has been undertaken.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: Letters have been sent by email on 9 December 2021 to the St Pancras and Somers Town Ward Councillors – Cllrs Khatoun, Robinson and Tomlinson. The letters advise Councillors of the situation.			
Summary of outcome/main issues raised (include copies of relevant correspondence): To date no responses have been received. Any relevant responses will be forwarded when received.			


School/College

Location of site in relation to school/college (include name of school/college): A search for schools and non-domestic childcare institutions was conducted via Ofsted and Department for Education databases. The closest establishment is Abacus Belsize Primary School on the northern side of the Regent's Canal, which is approximately 70 metres from the site.
Outline of consultation carried out with school/college (include evidence of consultation): Letters were sent to the Headteacher and Chair of Governors, by email, on 9 December 2021. The letters advised the school of the situation.
Summary of outcome/main issues raised (include copies of main correspondence): To date no responses have been received. Any relevant responses will be forwarded when received.

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Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response: N/A – full planning application.		

Developer's Notice

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


3. Proposed Development

<p>The proposed site:</p> <p>As background to the application, Vodafone Ltd and O2 previously had equipment on the roof of 6 St Pancras Way, providing coverage to the surrounding area. Due to the proposed redevelopment of the site the equipment had to be removed. The temporary lattice tower and equipment cabinets (the subject of this application) was installed to provide temporary coverage to the area whilst a permanent replacement site is found.</p> <p>When the site was initially installed an Emergency Notice was served on Camden Council, in March 2020. It has been difficult to find a permanent replacement site, hence this application to renew consent for the existing mast for a further 18 months. An alternative site has now been identified and is being progressed as a permanent solution. The preferred option is to locate equipment onto a modern residential building, Onyx Apartments, on Camley Street, to the east of the temporary site. A formal planning submission will be forwarded to Camden Council in due course. Despite the good progress that has been made recently, an 18-month extension period is sought due to the complexities of agreeing legal access to buildings which can take some time to complete.</p> <p>This proposal consists of the retention of the 30 metre high lattice tower supporting 6 no. Vodafone antennas and 6 no. O2 antennas at the top of the tower, for a</p>
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further 18 months. Ancillary equipment cabinets are located adjacent to the tower at ground level.

The area around the site is mixed use in character, with both commercial and residential uses close to the site. The site sits within the Regents Canal Conservation Area.


The existing installation is shown on the photograph below:



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Type of Structure (e.g. tower, mast, etc):	Lattice tower	
Description:	The retention of the existing 30 metre high temporary lattice tower supporting 12 no. antennas, 4 no. transmission dishes, 5 no. radio equipment cabinets and ancillary development thereto for a further 18 months.	
Overall Height:	30 metres	
Height of existing building (where applicable):	N/A	
Existing Equipment Housings:		
Length:	2 x 1.898m/ 2 x 0.75m/ 1.0m	
Width:	2 x 0.798m/ 2 x 0.798m/ 0.47m	
Height:	2 x 1.648m/ 2 x 1.648m/ 1.0m	
Materials (as applicable):		
Tower/mast etc – type of material and external colour:	Steel with a galvanised finish.	
Equipment housing – type of material and external colour:	Steel with a grey finish.	


Reasons for choice of design, making reference to pre-application responses:
<p>In designing the proposed scheme, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree, especially with this being a temporary site.</p> <p>There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.</p> <p>In all aspects of the design now put forward the smallest practical components have been utilised to ensure that the visual impact of the development is kept to the absolute minimum. The height of the proposal was determined by the network radio</p>

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planners as being the minimum at which adequate temporary coverage to the target area could be achieved.

It is noted that, as the site is a temporary installation, the design of the equipment is standardised and options to change the appearance of the equipment are extremely limited, however the lattice tower has a slim and unfussy design to minimise impact. Although within a conservation area, the site is adjacent to a commercial premises, and adjacent to trees, ensuring impact is kept to an acceptable level. The impact is outweighed by the substantial public benefits of the proposal. For a temporary period, the siting and design is considered appropriate.

Technical Information


	Yes	No
<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)</p> <p>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.</p> <p>When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, O2 and Vodafone Ltd operates its networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.</p>		

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<p>As part of O2 and Vodafone Ltd's networks, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>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.</p> <p>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.</p>		
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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 installation provides 2G, 3G, 4G and 5G temporary coverage to the area for Vodafone Ltd O2.

The first generation of services provided voice calls, the second generation (2G) allowed basic data such as texting and the third generation (3G) offered internet access and the development of apps. Since then, the smart phone has developed further and the fourth generation has brought video and much faster data speeds allowing the integration of the smart phone into wider use.

The next generation of mobile telephony is 5G which brings greatly increasing data speeds. The advantages this presents range from near-instant downloads of HD films to connected cars, smart medical devices and smart cities. To bring this new technology Telefónica will need to provide a mix of upgrades to existing sites and the building of new sites. New sites will be needed for many reasons, including that the higher radio frequencies used for 5G do not travel as far as those frequencies currently in use leaving gaps in the network.

Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas and ancillary equipment will be needed. It has been acknowledged by Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks. This is one of the many additional structures that will be needed to provide enhanced services.

The higher frequencies that 5G will use can provide more bandwidth and thus greater capacity but the signal will not travel as far as those of previous generations. The implications to the built environment will be that more infrastructure needs to be deployed, as in this case.


5G is the next generation of mobile internet connectivity, offering faster speeds and more reliable connections on smartphones and other devices than ever before. Compared to even the most recent and efficient generation of mobile network, 4G, 5G is set to be far faster and more reliable, with even greater capacity and lower response times.

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As is often the case with the introduction of new mobile technologies, we are aware that there has been a lot of coverage on the internet and in the media with regard to the possible health implications of 5G rollout in the UK. Exposure to non-ionising radiation is regulated and limited and all UK base stations are required to comply with health and safety guidelines set by the International Commission on Non-Ionisation Radiation ('ICNIRP'). This is an independent body of scientists that was set up to provide advice and guidance on the health and environmental effects of non-ionizing radiation which is used in mobile telecommunications. The guidelines set by the commission are in place to protect all members of the public, of all ages and in all states of health and wherever they might be in relation to a base station for 24 hours a day. They are backed by the World Health Organisation, the EU and the UK Government.

The ICNIRP reviewed and updated their guidelines in 2020. The new guidelines provide better and more detailed exposure guidance in particular for the higher frequency range, above 6 GHz, which is of importance to 5G and future technologies using these higher frequencies. The ICNIRP chairman, Dr Eric van Rongen, has advised that "the most important thing for people to remember is that 5G technologies will not be able to cause harm when these new guidelines are adhered to". We confirm that they are adhered to by H3G as well as the UKs other mobile operators.

The Director of Mobile UK has also commented on the updated ICNIRP guidelines and stated that "The consistent conclusion of public health agencies and expert groups is that compliance with the international guidelines is protective for all persons (including children) against all established health risks." (our emphasis).

Public Health England (PHE) commented in 2019 that "It is possible that there may be a small increase in overall exposure to radio waves when 5G is added to an existing network or in a new area. However, the overall exposure is expected to remain low relative to guidelines and, as such, there should be no consequences for public health" <https://www.gov.uk/government/publications/5g-technologies-radio-waves-and-health/5gtechnologies-radio-waves-and-health>


There has been a significant amount of other independent, peer reviewed, scientific research by recognised bodies that has been carried out into the technology used in mobile telecommunications over several decades. The consensus of the international scientific community is that there has been no convincing evidence to date that RF field exposure below the internationally agreed guideline levels applied in the UK (ICNIRP) causes negative health effects in adults or children. This includes recent reviews of 5G technology.

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In January 2019 the Finnish Radiation and Nuclear Safety Authority (STUK) concluded that “In the light of current information, exposure to radio frequency radiation from base stations will not rise to a significant level with the introduction of the 5G network. From the point of view of exposure to radio frequency radiation, the new base stations do not differ significantly from the base stations of existing mobile communication technologies (2G, 3G, 4G)”
<https://www.stuk.fi/aiheet/matkapuhelimet-jatukiasemat/matkapuhelinverkko/5g-verkon-sateilyturvallisuus>

Similarly, and also in January 2019, the Norwegian Radiation and Nuclear Safety Authority (DSA), commented that “The overall research shows that the radiation from wireless technology is not hazardous to health, as long as the levels are below the recommended limit values. This is the prevailing view among researchers in many countries today, and it is supported by the EU Scientific Committee. We have used cell phones and radio 5G and transmitters for decades and much research has been done on how this affects our health. Risk factors of importance to public health have not been found. With the knowledge we have today, there is no need to worry that 5G is hazardous to health.”
<https://www.dsa.no/temaartikler/94565/5g-teknologi-og-straaling>.

All Vodafone and O2 base stations are designed to be fully compliant with ICNIRP guidelines, and a certificate of compliance is included with the application. In addition, a document entitled ‘Mobile Health Fact Sheet’ is included with the application documents. This provides a simple explanation of 5G and the equipment behind it, including the antennae and the masts, in particular in relation to health issues.


Further detail regarding the general operation of the network can be found in the accompanying document entitled ‘General Background Information for Telecommunications Development’. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.

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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 Type	Site name and address	National Grid Reference	Reason for not choosing site
			N/A

If no alternative site options have been investigated, please explain why:
 As this application relates to the retention of a temporary structure no alternative site locations have been investigated.

Environmental Information (refer to Section 2 of Site Finder Report):


As far as practicable the proposed development has been designed to keep to a minimum the impact of the development on the surrounding area. A slim and unfussy design of structure with a minimal footprint has been chosen to keep the impact of telecommunications development in the area to a minimum.

A check of the 'Gov.uk Flood map for planning' confirms the site has a low risk of flooding.

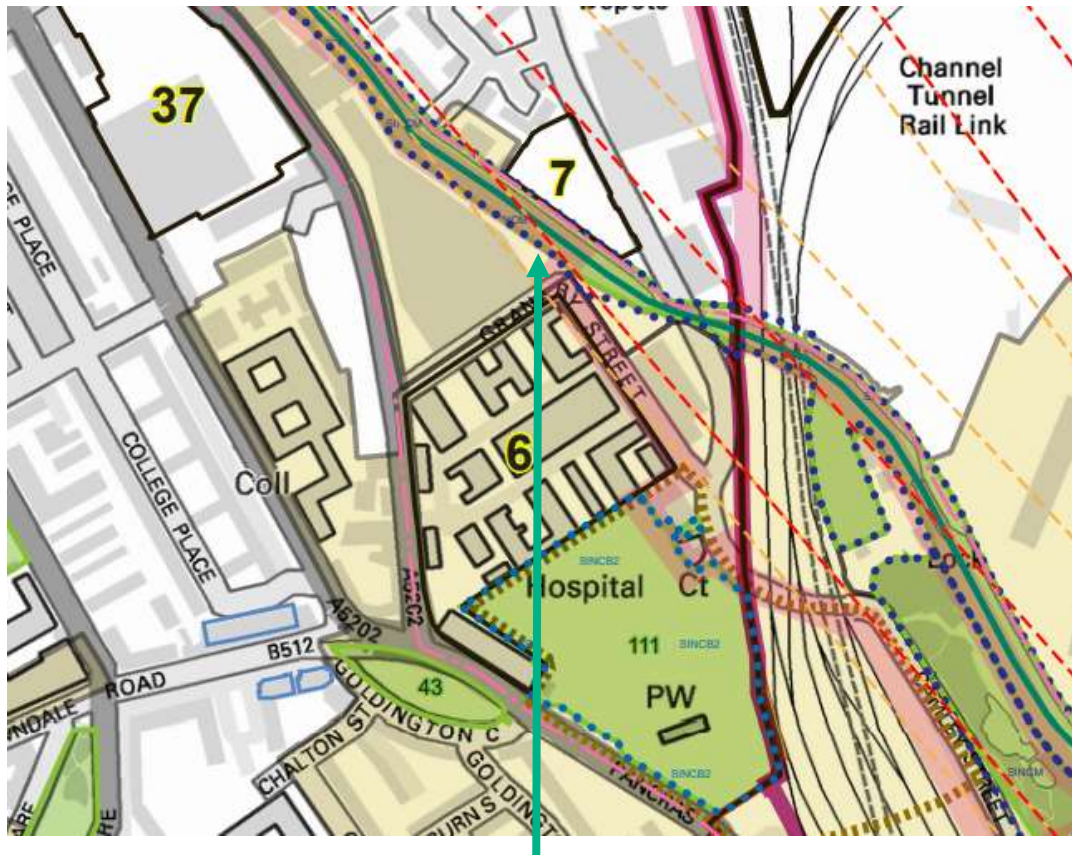
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Land use planning designations (if Heritage Statement is required then include here or make reference to attached Heritage Statement):



Site location

The above map is taken from the Council's Local Plan Policies Map August 2021). The site is confirmed within a conservation area.

Additional relevant information (include planning policy and material considerations):

Visual Impact and appearance:


The proposed development is required to provide continued temporary coverage to the area for both Vodafone and O2, whilst a suitable replacement permanent site is completed legally, planning consent obtained and the site built. The temporary site provides 2G, 3G, 4G and 5G coverage.

Whilst the equipment is visible, its impact is considered to be minimal and not sufficient to harm visual amenity. Although there are residential properties close to

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the site it is located within the boundary of a commercial premises, and there are trees adjacent to the site which mitigates impact. The tower has a slim and unfussy design, with a minimal footprint. Its impact is outweighed by the significant benefits of the proposal.

In terms of heritage assets, the site is located within the Regents Canal Conservation Area. The equipment causes a less than substantial harm to the designated asset. As it is an existing structure and only proposed for a temporary period to provide coverage to the surrounding area, these factors ensure the benefits of the proposal outweigh the less than substantial harm.

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 surrounding area being outweighed by the provision of continued temporary services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2021) (NPPF)

The National Planning Policy Framework came into force in 2012. The guidance has most recently been revised in July 2021. 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*

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current and future needs and support communities' health, social and cultural well-being; and

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

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

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

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

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

The proposed development will enable the provision of 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

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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 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 114 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 115 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 proposing to utilise a single installation for two operators and for multiple technologies, the proposal is in line with the above policy.


It should be noted that paragraph 118 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*

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communications system, or set health safeguards different from the International Commission guidelines for public exposure”.

In terms of heritage assets, section 16 of the guidance deals with 'Conserving and enhancing the historic environment'. Paragraph 189 sets out that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 202 states: “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.” The installation is located within a conservation area. It is considered there would be a less than substantial harm, being an existing base station site proposed for a temporary period, and that the extremely limited harm would be outweighed by the significant benefits of the proposal.

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

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plan for Camden Council, relevant to the proposal, comprises:

- The London Plan: The Spatial Development strategy for Greater London 2021;
- The Camden Local Plan (2017) and the Site Allocations Plan (2013).

The London Plan


This revised guidance emphasises the importance of digital infrastructure. Policy SI 6 deals specifically with Digital connectivity infrastructure. The general aim of the policy is for new development to meet demand for connectivity. This is expanded upon in the supporting text for the policy. Paragraph 9.6.1 states: “**The provision of digital infrastructure** is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance. London should be a world-leading tech hub with world-class

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digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration."

The revised guidance is clearly supportive of the proposal and the role that it will perform allowing Vodafone and O2 to provide continued coverage to the surrounding area.

Local Plan

There are no policies relating directly to telecommunications development within the development plan documents. General policies of relevance include D1 (Design) which requires a high standard of development, and policy D2 (Heritage). This policy aims to preserve and enhance Camden's heritage assets, including conservation areas and listed buildings. Development within conservation areas is required to preserve or enhance the character or appearance of the area.

It is considered the proposal complies with both policies. The installation comprises a slim lattice structure, with ancillary equipment cabinets at its base. The cabinets would be generally screened by the brick wall fronting the site. Although visible in the surrounding area, impact would be minimal, as the site is adjacent to both a commercial building and trees. As previously noted, the site is located within a conservation area, although there no listed buildings affected by the development. Impact on heritage assets would be less than substantial, and this harm would be outweighed by the substantial benefits of the proposal.


Also, to note is Camden Planning Guidance – Digital Infrastructure (2018). This document sets out as a key message that *"The Council will support the expansion of electronic communications networks, including telecommunications and high speed broadband"* and goes on to set out that proposals for telecommunications equipment will be determined in accordance with the National Planning Policy Framework (see section above).

In the first instance, all correspondence should be directed to the agent.

Cornerstone ICNIRP Declaration with Clarification Letter (England) V.2 – 15/04/2021

Registered Address:

Cornerstone Telecommunications, Infrastructure Limited,
Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.
Registered in England & Wales No. 08087551.
VAT No. GB142 8555 06

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Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This development is proposed to provide continued temporary coverage to the area for Vodafone and O2. A simple design solution is proposed to mitigate visual impact and prevent harm to the local environment.

The proposed development is compliant with the relevant policies from the NPPF and Development Plan, as outlined within this supporting statement. The proposal is fully compliant with ICNIRP guidelines and declaration of compliance has been provided.


Confirmation that submitted drawings have been checked for accuracy

Name:	Chris Andrews	Telephone:	01932 411011
(Agent)			
Operator	Vodafone Ltd & O2		
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Signed:		Date:	15 December 2021
Position:	Planning Department	Company:	Waldon Telecom Ltd (on behalf of Cornerstone) (on behalf of Cornerstone and above operator)

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