



SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Scala House	Site	Scala House
National Grid	E529446	Address:	21 Tottenham Street
Reference:	N181792		London
			WIT 2AW
Site Ref	CTIL_303769_00	Site Type:1	Macro
Number:			

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	<u>No</u>
If no explain why: No LPA mast register was found. In the absence consulted the publicly available planning record	of a mast register, t 's in the area.	he Applicant has
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	21/11/2024
Name of contact:	N/A



¹ Macro or Micro

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Summary of outcome/Main issues raised:

Pre-application consultation correspondence including plans showing the proposed development was emailed to the LPA on 21 November 2024. A response was received from the LPA advising that a fee was required for pre-application advice. Considering the fact that the LPA has previously granted planning consent for a similar proposal (application reference 2020/4696/P), it was decided to progress the application and seek the LPA's formal determination.

Annual area wide information to planning authority

Has annual area wide information been provided?	NO
If no explain why:	

Summary issues raised:

Cornerstone's commercial relationship with VMO2 (also known as O2) has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means they no longer have visibility of VMO2's full update plans. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance.

Cornerstone aims to engage and work with the planning department at the earliest opportunity from when they are instructed to deliver new infrastructure within a Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss wider rollout plans. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans, then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
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Outline of consultation carried out:

The site and proposed works were assessed against the traffic light model as referred to in the Code of Practice for Wireless Network Development(England) prior to consultations being undertaken. An amber rating was assigned.

Pre-application consultation correspondence was issued by email on 21 November 2024 to MP Keir Starmer and Bloomsbury Ward Councillors, Cllrs Sabrina Francis, Adam Harrison and Rishi Madlani.

Letters were posted on 21 November 2024 to the residents of Scala House. A total of 34 properties were notified of the proposal.

Summary of outcome/main issues raised (include copies of relevant correspondence):

No responses were received.

School/College

Location of site in relation to school/college (include name of school/college):

No schools were identified nearby that would be impacted by the proposed development.

Outline of consultation carried out with school/college (include evidence of consultation): N/A

Summary of outcome/main issues raised (include copies of main correspondence): N/A

Civil Aviation Authority/Secretary of State for Defence or the operator of the civil safeguarding area or defence safeguarding area notification (only required for an application for prior approval)

Will the proposed development be on a civil safeguarding area or a defence safeguarding area?	Yes	No
Has the Civil Aviation Authority/Secretary of State	Yes	No
for Defence/operator of the civil safeguarding		
area or defence safeguarding area been notified?		

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Details of response:

N/A Full Planning Application

Developer's Notice

Copy of Developer's Notice enclosed		Yes	No
Date served:	N/A Full Plannir	ng Application	

3. Proposed Development

The proposed site:

The proposed site is a ten storey apartment building bordered by Tottenham Street to the north and Scala Street to the south. The building is in Charlotte Street conservation area . It is not statutory listed.

The area comprises a mix of commercial and residential development. The level and scale of development in the area, combined with road layouts, means that views of the building are restricted to the local area.



Figure 1: East view of the subject building from Tottenham Street. Image source: Google maps

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Figure 2: Aerial view of the subject building (shown by a red arrow) and the surrounding environment. Image source: Gridreferencefinder.com

In March 2021, Cornerstone was granted planning consent to install 6no. antennas, 1no. 300mm dish, 3no. cabinets and ancillary development on the roof of Scala House. This planning consent expired before the build process could be finalised. The Applicant is now seeking to renew it.

The application seeks planning permission for the installation of 6no.antennas, 2no. 300mm dishes and associated cabinets on the roof of Scala House, 21 Tottenham Street to enhance 2G, 3G and 4G service provision and to provide new 5G coverage for VMO2 in this area.

Enclose map showing the cell centre and adjoining cells if appropriate: The coverage plots attached to the application show the proposed site in the context of the neighbouring cells.

Type of Structure (e.g. tower, mast, etc): Rooftop installation Description:

The proposed development comprises the installation of 6no. antennas, 2no.300mm dishes, 3no. equipment cabinets and ancillary development thereto at roof level.

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Overall Height:	39.55 metres (to top of antennas)			
Height of existing building (where applicable):	33 metres (main roof) 37.40 metres (plantroom roof level)			
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Equipment Housing Dimensions: Cabinets x3				
1no. cabinet measuring 0.770m (w) x 0.770m(D) x1.800m(H) 2no. cabinets measuring 0.750m(w) x 0.600m (D) x 2.000m (H)				
Materials (as applicable):				
Tower/mast etc – type of material and Antenna support poles - Galvanised steel-				
external colour: grey				
Equipment housing – type of material	Galvanised steel – grey			
and external colour:				

Reasons for choice of design, making reference to pre-application responses: The proposed design has been determined considering the surrounding context and technical requirement of the site. The Applicant has sought to achieve a balance between technical requirements and minimising visual impact as far as is practicable and as technical constraints permit.

The design is standard for a rooftop installation consisting of pole mounted antennas fixed to the northern and southern ends of the plantroom respectively in pairs. The proposal also includes two 300mm diameter dishes which would be fixed to the two antenna poles on the western end of the plantroom.

To ensure the visual effect of the installation is kept to the absolute minimum, all components of the design have been kept to the smallest and the least number necessary to meet the technical objective. The antennas are grouped in pairs to reduce clutter on the roof.

The height of the antennas is the lowest required to effectively address the coverage requirement and for operational efficiency. The height is determined by a specialist network radio engineer factoring in the target coverage area and other elements such as nearby trees or buildings (referred to as clutter), which can block or weaken signals. Surrounding clutter needs to be cleared to provide a clear line of sight for the radio signal from the antennas. The height of the antennas is therefore crucial to allow them to unrestrictedly emit the signal to the target area. By positioning the antennas at the requisite height, the installation is able to function effectively delivering the maximum coverage to the intended area meaning fewer mast sites are required in any given area. Furthermore, the proposed antennas include 5G antennas which are more susceptible to the shadowing effect of surrounding clutter therefore their

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placement is even more critical to delivering this technology. The proposed height would ensure the installation achieves the required coverage to address the technical objective.

Another element that has influenced the height of the antennas is the requirement to comply with international public exposure guidelines. All UK mobile phone base stations are required to comply with safety guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP), an independent organisation whose guidelines are backed by the UK government and World Health Organisation. The antennas, in this case need to be elevated at a specific height to avoid the radio signal "clipping" the roof edge and propagating onto the roof in breach of ICNIRP guidelines. The antenna have been elevated at the lowest height that would ensure ICNIRP compliance for people accessing the roof.

The cabinets are of a simple design and would be installed on the main roof adjacent the plantroom on the northern section of the roof. The cabinets would not be noticeable in street views due to their low height and setback position on the roof plus screening by the parapet wall.

It is considered the proposed design achieves a good balance between minimising visual impact and meeting the technical requirement.

Health and Safety - including ICNIRP compliance The proposal complies fully with ICNIRP guidelines and declaration of compliance is provided with the application.

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 proposed development will enable the provision of enhanced 2G, 3G, 4G and new cutting-edge 5G services for VMO2 in this part of London. The site will also provide additional capacity on the network.

4G (LTE, the acronym used for 'Long Term Evolution') supports mixed data, voice, video and messaging traffic and offers speeds of up to five times faster than 3G, enabling network users with 4G devices to benefit from ultra-fast internet browsing,

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video streaming, gaming, e-mail and downloads. 5G is the latest generation of mobile internet connectivity, offering faster speeds and more reliable connections on smartphones and other devices than ever before.

Coverage plots provided by the network radio planner, demonstrating the need for the new site for O2's network are enclosed. The plots show existing deficiency in the area for network coverage, and the significant improvement predicted once the application site is integrated into the network. The proposed installation will fill a substantial coverage hole within this area of Fitzrovia providing the best possible levels of coverage (represented by purple and orange shading) to those areas around Scala Street that currently lack indoor coverage or have a very weak indoor signal.

The plots only show the geographical spread of coverage. They do not show the improvement to capacity(the volume of call and data traffic) of the network, which will also be significantly enhanced. For example, while there are instances where the coverage improvements in some areas may appear modest, during times of high usage in these areas, the quality of services could still be affected as the network might not have the available capacity to provide a reliable and fast connection to the users. Therefore, the capacity on the network is critical to maintaining a high quality and reliable service for users which would be achieved by the proposed site.



CTiL – Existing Telefonica Coverage

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Figure 4: Predicted coverage with the proposed site at Scala House

Public Benefits

The benefits of reliable mobile connectivity and 5G provision are widely recognised. High-quality communications infrastructure is essential for sustainable economic growth and also plays a vital role in enhancing the provision of local community facilities and services.

The benefits of 5G technology are profound. Compared to even the most recent and efficient generation of mobile network, 4G, 5G is significantly faster and more reliable, with greater capacity and lower response times. The technological improvement of 5G when compared to 4G is particularly noticeable in three areas.

Firstly, the bandwidth of 5G is around 40 times faster than current 4G speeds, which enables large amounts of data to be transferred in a few seconds – for example a full length HD movie of 15GB will take around 6seconds to download on 5G.

Secondly, 5G has an ultra-fast 1ms latency time, providing reliable and nearinstantaneous responses between instructions to devices. This would result in an autonomous vehicle travelling at 100km/h would receive a stop signal after moving just 2.7cm. Connections are also ultra-reliable, with a very low error-rate.

Thirdly, 5G is able to support up to 1,000,000 devices within a 1km² area, which will provide the backbone for the evolution of the Internet of Things.

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The government recognises the importance of advanced communications infrastructure, such as the proposed development, as a key driver of economic growth. It considers digital connectivity as an essential service that should be readily accessible to everyone. In the latest report by the Department for Science, Innovation and Technology "UK Wireless Infrastructure Strategy" April 2023, in the foreword the Secretary of State states that "Connectivity has brought benefits for British households" and British business, boosting growth, productivity, and opportunity for all. And change shows no sign of stopping. In fact, we find ourselves on the brink of a new revolution which promises to transform the world once more." She further states that "5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone 5G will drive growth in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. 5G can improve our public services, too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis." "This is an incredible opportunity; widespread adoption of 5G could see £159bn in productivity benefits by 2035. And it is exactly the kind of opportunity which the Department for Science, Innovation and Technology was created to seize. It is my personal mission as the Department's first Secretary of State to put Britain right at the forefront of scientific and technological progress. By bringing together world-class research and a dynamic business ecosystem, we can harness enterprise and innovation to grow the economy, driving forward the delivery of one of the Prime Minister's five priorities."

The report sets a bold ambition for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030. "Given the substantial potential that 5G offers for businesses and public service delivery, we are setting out a bold vision for the next generation of our national networks to galvanise investment across our economy. We want to move beyond the basic 5G that is being deployed now over 4G networks to build higher quality, standalone 5G networks that do not rely on older infrastructure. We also want to extend 5G coverage well beyond cities and towns to all populated areas of the UK, including rural villages and communities."

In the same report, in the forward by the minister of State, they state that "delivering world-class digital infrastructure to all Britons is a fundamental mission of this government - and our efforts to build it the modern equivalent in scale and ambition to the Victorians' construction of the railways. Our plan is for every corner of our country to get lightning fast connectivity, not only to give people real choices about where to live and work today but so they will not be left out of future technological revolutions because of poor infrastructure." "Although it is impossible accurately to

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predict when large scale demand for 5G and other forms of advanced wireless connectivity will emerge and how widespread that will be, mobile data provided over public mobile networks has grown 40% per year on average over the last decade and we expect to see continued growth in data traffic over the next decade. Ofcom's Mobile Market Review suggests data growth could range from a 25% increase per year to 2030 to 55% increase per year to 2030."

The growth of mobile usage and increase in demand for mobile data is further highlighted in Ofcom's report "Mobile networks and spectrum - Meeting future demand for mobile data (9 February 2022)." According to this report "In recent years we have seen an average 40% year-on-year growth in demand for mobile services provided over public mobile networks. This growth has been driven by the development of new applications and enabled by evolving technologies and consequent changes in consumer behaviour" (paragraph 2.6). The demand for mobile data is expected to "continue to grow as we rely on it ever more to carry out daily activities like shopping, gaming, banking and watching movies. Demand is likely to be stimulated further as new and more sophisticated applications are developed, and by the development of machine-to-machine and machine-to-device applications" (paragraph 2.7).

In paragraph 1.1 of "Ofcom's future approach to mobile markets and spectrum" report, it is stated that "We expect demand for mobile data to continue to grow as greater use is made of data-hungry services and as new technologies enable new uses." "Network quality is likely to be of growing importance to customers" (paragraph 1.2). Reliable and advanced infrastructure like the proposed development is required to support the increasing demand on the networks and to support the latest 5G technology required to deliver advanced mobile capabilities.

Below are examples of practical applications of 5G connectivity in everyday life which further emphases the importance of this technology.

Education

The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere. 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

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Health

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

Considering the importance of 5G technology and the remarkably high demand for mobile services, it is crucial for mobile operators to provide and maintain a reliable, mobile digital infrastructure network that provides the necessary coverage and capacity to allow reliable mobile connectivity and to meet the ever increasing demand for data services by users. The proposed essential infrastructure will contribute to meeting this demand and it will improve access to the very latest technologies for businesses, residents and visitors in this area.

The above reports emphasise the importance of advanced digital infrastructure such as the proposed development and support the expansion of 5G technology which can handle ever larger data requirements and significantly improve network efficiency. The proposal which supports 5G technology is precisely the type of highspeed digital infrastructure the government is seeking to promote to achieve its ambition of delivering world-class digital infrastructure to the whole of the UK, essential for sustainable economic growth.

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 selection is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location. Several factors are considered when assessing sites for a base station i.e the relationship between the location of the proposed site and existing sites within the network due to the unique and specific gap in coverage that must be filled to ensure the site fits into the established cellular pattern. This places limitations on the site selection process as many sites will not be

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able to precisely fill the identified coverage gap. Site placement is therefore critical to achieving a reliable advanced network capable of delivering the latest 5G technology necessary to enhance mobile connectivity for customers in this area.

Other factors to consider in the site selection process are whether the site offers the flexibility to achieve the necessary antenna orientations and heights required to effectively provide coverage to the desired areas; the presence of natural or manmade features (referred to as clutter) at, or near to, the location that might affect the efficiency of the antennas; planning considerations (consideration to what can be feasibly achieved with a design that will be visually appropriate), the ability for the site to be built and maintained (sufficient space, ensuring ICNIRP requirements are met, just to name a few).

Another element to note is that because mobile base stations are relatively low powered devices, they only cover a limited geographical area (referred to as a cell) and therefore they need to be sited close to where people wish to use their mobile phones, where people live and work to ensure good connectivity. In heavily built-up areas like this one, for example, a small base station might cover only a few hundred metres. Again, by placing sites in areas where they are needed, the overall number of sites in any given area is minimised as fewer sites are required to provide infill coverage.

A comprehensive search of the area was undertaken to identify possible siting options. The aim of site identification is to find the most technically efficient site, which has the minimum impact on visual amenity and the environment. A sequential approach to site selection has been followed as advocated by the Code of Practice for Wireless Network Development.

There are no suitable existing mast sites in the target area upon which the required apparatus can be installed. As no suitable existing mast sites could be found, the use of an existing building has been considered.

Figure 5 shows the alternative site options (shown by red markers) considered. The reasons for not selecting these sites are detailed in the subsequent table.

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Figure 5: Map showing alternative site options discounted.

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
D1-Rooftop	52 Tottenham Street, London W1T 4RP	529335, 181754	A new development to the north of this site may block coverage in this direction, and, as such, this site has been discounted in favour of improved radio coverage at the proposed location.
D2- Rooftop	30 Cleveland Street, London, W1T 4JD	529308, 181741	A new development to the north of this site may block coverage in this direction, and, as such, this site has been discounted in favour of improved radio coverage at the proposed location.
D3 - Rooftop	25 Cleveland Street, London, W1T 3BF	529281, 181721	This site has been discounted on build and design grounds as there is a lot of rooftop clutter that would be difficult to work around.
D4 - Rooftop	6 Mortimer Street, London W1T 3JJ	529304, 181685	This site has been discounted on build and design grounds as there is

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			a lot of rooftop clutter that would be difficult to work around.
D5 - Rooftop	48 Charlotte Street, London, W1T 2NS	529437, 181750	This building is lower than the subject building and does not meet the height required to provide coverage to the target area.
D6 -Rooftop	37 Charlotte Street, London, W1T 1RR	529459, 181650	This building has a pitched roof and is therefore unsuitable for the installation of telecommunications equipment.

If no alternative site options have been investigated, please explain why: Land use planning designations:

The below map and key taken from Camden's Local Plan Policies Map confirms the building is located in Charlotte Street Conservation area (yellow shading). The building is not listed.



Figure 6: Existing planning landuse designations. Subject site (shown by the blue marker). Map source: Camden Local Plan Policies Map

Heritage Assessment

The Charlotte Street Conservation Area Appraisal and Management Plan (Adopted July 2008) reveals that the area has been classified as a designated area due to the Georgian style townhouses and developments from the late 19th and 20th century which have tended to be larger in scale.

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Most streets contain a mix of commercial and residential properties. Several modern developments have been noted in the local area. The proposed works will result in some change to the roofscape of the area due to the installation of the telecommunications equipment on the roof of Scala House. However, it is considered that this change will be relatively minor in scope and will only affect a very localised area within the Charlotte Street Conservation Area considering the limited views of the apparatus. The proposed works represent far smaller changes to the conservation area than that which has resulted from the modern developments in the area. It is generally considered that the impact of the proposed development on the character of the conservation area would be minor.

The impact on the setting of the nearby listed buildings would be negligible. As noted above, the proposals will result in a change to the setting of the area, but this will be limited in scope and mitigated by modern development in the area.

In determining planning applications, the National Planning Policy Framework (2023) (NPPF) advises that "local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;...." (para. 203)

"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." (para 208)

It is the Applicant's view that the impact of the proposal on heritage assets would be at minor levels of less than substantial harm and that this would be outweighed by the significant public benefits of the development arising from enhanced mobile connectivity.

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

National Planning Policy Framework (December 2024) (NPPF)

Paragraph 7 of the NPPF states "The purpose of the planning system is to contribute to the achievement of sustainable development", and in paragraph 10 that "at the heart of the Framework is a presumption in favour of sustainable development". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

"a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

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

The proposed development will improve mobile connectivity in this area benefiting users socially and contributing to economic growth and sustainable development.

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**, 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 119 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



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communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections".

While supported, the number of base stations is encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 120 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."

It is confirmed that there is no opportunity to utilise an existing telecommunications site to meet the technical requirement in this instance. The proposal seeks to utilise a building to meet that need, in direct compliance with paragraph 120. This singular proposal will also provide coverage for multiple technologies for VMO2 and therefore is in line with the above requirement.

It should be noted that paragraph 123 states that "Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure."

The need for the proposed development has been explained in part 4 of this report. The proposed development has been designed to be fully compliant with the precautionary ICNIRP guidelines and declaration of compliance is provided with the application.

The proposal is fully compliant with the guidance set out in the National Planning Policy Framework.

Camden Local Plan 2017

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), which 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 the above policies as explained in the preceding section and part 3 of this report. To further supplement, the scheme has

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been specifically designed for this location and the equipment positioned away from the roof edge to minimise any impacts on the building and surrounding area. The proposal is small in scale relative to the host building. Although the apparatus may be visible from certain viewpoints any impacts on the building and area would be minimal, due to the building's height and the central location of the equipment on the roof.

Also, of relevance 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 to which the proposal complies.

London Plan 2021

The London Plan sets out the mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area.

In 'Policy SI 6: Digital Connectivity Infrastructure' the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to ensure its global competitiveness, now and in the future.

It is considered that the Operator's network is an integral element in securing the mayor's vision for the delivery of modern communications networks across London. The written justification for Policy SI 6 states the following:

"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 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.

Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their Development Plans".

Policy SI 6, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing VMO2 to significantly enhance coverage to the

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surrounding area. The proposed development meets the aims of the London Plan (2021) and the long-term strategies which the mayor aims to achieve through this guidance.

Other Policy Guidance

London Infrastructure Delivery Plan 2050 (published 2014):

As part of the work on the 2015 London Plan Alterations, the Mayor commissioned work to develop a long-term infrastructure investment plan for London, and in 2014 the 'London Infrastructure Delivery Plan 2050' was published. The stated aim of the Infrastructure Delivery Plan is to provide for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan, 'Digital Connectivity', indicates how the Mayor's Office will support a mix of technologies including mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term, as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. Deployment of the proposed base station will contribute to London's agenda for reliable high-speed communications as it has been designed to incorporate emerging and future technologies. Among other matters the Delivery Plan stated:

"Broadband is now considered the fourth utility. The Government has stated that it wants 99% of the population to have superfast connections by 2018. Internet access speeds and coverage affect the productivity of businesses and are now a factor considered by homebuyers. Access is not only essential to many businesses, but also, as more local authorities are encouraged to move the services they provide online, access is essential for residents to be able to take part in a modern society. The mayor wants every resident and business in London to be able to have affordable highspeed internet connectivity, should they choose to access it".

This proposal seeks, individually, to provide high speed mobile internet connectivity throughout an area of Greater London in line with the London Infrastructure Delivery Plan.

Visual Impact of the Proposed Development

The applicant gives due regard in designing all new sites to limit the visual impact through good design. As explained earlier in part 3, the proposed installation is subject to technical and build constraints. Nevertheless, it is submitted that the appropriate siting and design put forth will mitigate any potential impact on the building and its surroundings to acceptable level.

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The development would be barely noticeable in street views considering the height of the building. It has already been noted that views of the proposal would generally be localised owing to road layouts and intervening development across the wider area limiting long views of the development. Where the antennas are visible, they would be viewed with other rooftop paraphernalia and would appear as unintrusive subservient features on a relatively substantial building. Other mitigating factors noted include the position of the apparatus away from the main elevations of the building, the limited height of the antennas only exceeding the plantroom by a maximum of 2.1 metres and the small scale of the antennas and their simple pole mount design. The roadside trees dotted around the area would also provide some screening for the proposal in some mid-range views for example in east views from Tottenham Street/Whitfield Gardens.

Overall, the scale of works at this site are of such small scale that any disparity between the existing and proposed views is unlikely to register, whether the viewpoint is from street level or from a neighbouring building. Considering the urban character of the area, it may be considered that this type of development is exactly the type of development that would be expected on a rooftop such as this.

All the above factors in mind, it is considered the proposal is wholly appropriate and its visual impact will be within acceptable limits. The impact on heritage assets would be at minor levels of less than substantial harm. The Applicant maintains that the installation would be a significant benefit to businesses, residents and visitors in this area and any impacts on the area would be negligible and outweighed by the public benefits of the development.

Summary and Conclusion

This application seeks planning consent for the installation of telecommunications equipment on the roof of Scala House, 21 Tottenham Street. The proposed development is required to enhance existing mobile services and to provide 5G coverage and additional capacity on the O2 network. The new infrastructure will significantly boost mobile connectivity and capacity in this area aiding economic growth whilst also ensuring the social needs of the community are met. The social and economic benefits of advanced communications infrastructure are widely known, and these have been highlighted in this report.

The equipment's design is based on the principle of meeting operational requirements whilst minimising impact on the building and surrounding area, as far as operational constraints allow. It has been demonstrated that the design of the installation is appropriate and that the proposal is acceptable within the surrounding context resulting in acceptable impact.

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The proposed site presents the opportunity to use an existing building to host the required equipment in accordance with government guidance and would effectively address the technical requirement with minimum impact on the surrounding area. No suitable alternative sites have been identified in the area with greater technical and planning merit.

It has been explained that the resultant visual impact of the development would be limited and that the resultant impact on the character and appearance of the conservation area would be negligible resulting in less than substantial harm. This would be outweighed by the significant public benefits of the development arising from enhanced mobile connectivity.

The proposal is fully compliant with ICNIRP guidelines and declaration of compliance has been provided.

The development complies with the relevant local plan policies and national planning guidance as outlined in this report.

Confirmation that submitted drawings have been checked for accuracy

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