SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Albion House	Site Address:	Rooftop of Albion House, 55-59 New Oxford Street, London, WC1A 1BS
National Grid Reference:	E: 530052 N: 181421		
Site Ref Number:	CS_242202	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?		No
If no explain why: No publicly available up to date mast register.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	17/12/2024
Name of contact:	Chief Planning Officer
Summary of outcome/Main issues raised: A pre-application consultation letter, a consultation plan and set of proposed plans were sent to the Chief Planning Officer for the Local Planning Authority via email, dated 17/12/2024. No comments were received.	

Annual area wide information to planning authority

[1] Macro or Micro

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Has annual area wide information been provided?	No
If no explain why:	
Summary issues raised: Cornerstone commercial relationship with Vodafone UK Ltd has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means Cornerstone no longer have visibility of Vodafone's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. Cornerstone aim to engage and work with the planning department at the earliest opportunity from when they are instructed to deliver new infrastructure within Local Authority area and often conduct strategic pre-rollout engagement meeting to discuss their wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans, then please advise. Cornerstone recognise the importance of developing long term partnership and will always work with you to deliver improved mobile connectivity.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	~~Amber~~	~~Green~~
Outline of consultation carried out: Pre-application consultation letters and sets of proposed plans were sent to the local ward councillors for Holburn and Covent Garden Ward (Councillors Julian Fulbrook, Awale Olad and Sue Vincent) via email, dated 17/12/2024. A pre-application consultation letter and sets of proposed plans were sent to the London Assembly Member for Barnet and Camden (Andrew Dismore) via email, dated 17/12/2024. A pre-application consultation letter and a set of proposed plans were sent to the local MP for Holborn and St Pancras (Keir Starmer) via email, dated 17/12/2024.			
Summary of outcome/main issues raised (include copies of relevant correspondence): No comments have been received to date			

School/College

Location of site in relation to school/college (include name of school/college): Jeannine Manuel School, 43-45 Bedford Square, WC1B 3DN, London St Joseph's Catholic Primary School, Macklin Street, Covent Garden, London, WC2B 5NA Turtles Nursey, 47 Dudley Court, 36 Endell Street, London, WC2H 9RF Westminster High School, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ

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Outline of consultation carried out with school/college (include evidence of consultation): A pre-application consultation letter and sets of proposed plans were sent to the Headteacher and Chair of Governors for Jeannine Manuel School via email, dated 31/01/2025. A pre-application consultation letter and sets of proposed plans were sent to the Headteacher and Chair of Governors for St Joseph's Catholic Primary School via email, dated 31/01/2025. A pre-application consultation letter and sets of proposed plans were sent to the manager for Turtles Nursey via email, dated 31/01/2025. A pre-application consultation letter and sets of proposed plans were sent to the Headteacher and Chair of Governors Westminster High School via email, dated 31/01/2025.
Summary of outcome/main issues raised (include copies of main correspondence): No comments received to date

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?		No
Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area or defence safeguarding area been notified?		No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?		No
Date served:	Developer's notice, covering letter and site plans were sent to the site provider agent via Royal Mail recorded delivery on 10/02/2025 and to the site provider via email on 11/02/2025. Notice and proof of delivery attached as part of this application.	

3. Proposed Development

The proposed site:

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Background

Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. They oversee works on behalf of telecommunications providers and wherever possible aim to:

- promote shared infrastructure.
- maximise opportunities to consolidate the number of base stations.
- significantly reduce the environmental impact of network development.

As part of Cornerstone and Vodafone network improvement programme, Vodafone are in the process of upgrading a number of their existing sites in order to provide improved 2G, 4G and 5G coverage and capacity. This is fully in line with the Government's aim to ensure that everyone is connected to the superhighway.

As part of Vodafone continued network improvement program, there is a specific requirement for a new installation on the rooftop of Albion House, to provide improved 2G, 4G and 5G coverage and capacity, ensuring that this area of New Oxford Street has access to the latest technologies.

A new site at this location is needed to provide partial coverage replacement for a former base station site located atop of Castlewood House (Exiting site – ES) at the junction of New Oxford Street and Earnshaw Street. It was a well-established shared mobile telecommunications serving the New Oxford Street, St Giles High Street and Tottenham Court Road Underground station area. The reason behind the replacement is that the Landlord, due to redevelopment of Castlewood House, served a 'Notice to Quit' (NTQ), legally requiring the applicant to remove their equipment. The Landlord's proposal to redevelop the site for an 11-storey mixed used development was approved under LPA ref: 2017/0618/P. Without the replacement site the coverage in this cell area will be lost by the operator leading to a gap in their network.

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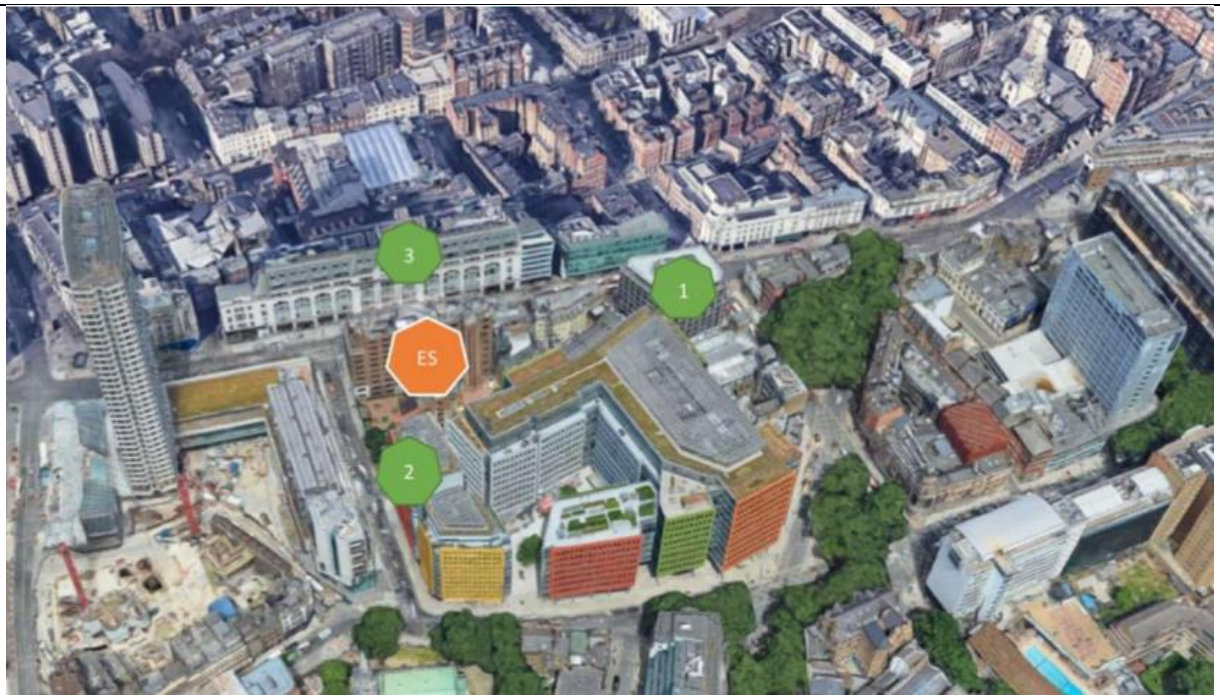

Figure 1. Aerial map illustrating location of (ES) the decommissioned site and the sites which together will replicate the coverage and capacity provided by Castlewood House. (1) Albion House (for Vodafone), (2) Central St Giles (VMO2 & Vodafone) and (3) 100 New Oxford Street (for VMO2).

The Application site (1) is one of three sites required as part of a 3 site split cell solution to fully replicate the coverage provided by the former Castlewood House. In conjunction with the application site which provides part replacement coverage to the east of the former Castlewood House cell area for VMO2, 100 New Oxford Street will provide part replacement coverage to the north of the former Castlewood House cell area for VMO2 (3), and Central St Giles (2) will provide part replacement coverage to the south of the former Castlewood House cell area for both VMO2 and Vodafone.

Currently, there is very limited coverage and capacity in this area of New Oxford Street, with the operator only having partial coverage and capacity in the cell area provided by neighboring cells.

Therefore, this replacement site for VMO2 is required to provide partial replicated and enhanced 2G, 4G and 5G coverage in this area. As this is a replacement site the radio base station needs to be as close as possible to the existing site to replicate the existing coverage and ensure there are no gaps in the network.

3G (and eventually 2G) is being switched off by the operators in order to repurpose these radio frequencies for faster more energy-efficient 4G and 5G services. 3G is primarily used for mobile data services. It is being switched off first because it has already largely been superseded by 4G. Hence the importance of providing the latest 4G and new 5G service provision in areas where there is no such coverage. 3G has already been switched off by

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Vodafone and EE in early 2024, and VMO2 (known as O2) is planning to do the same. Whilst no firm timescales have been announced as to when this will happen, it is expected to occur by 2025. As a result, it is imperative that the operator builds resilience into the network.

The applicant had a base station at Castlewood House, to the west of the application site, which provided coverage to the local area. However, due to the operator being served with NTQ, the site was turned off and removed in 2019, hence the need for the proposed replacement development to start to reinstate reliable mobile digital connectivity to this busy area ensuring Camden's ongoing competitiveness, in conjunction with an additional site for VMO2 at 100 New Oxford Street and for VMO2 and Vodafone at Central St Giles.

Figure 2 - View of the former Castlewood House from Castle Point from New Oxford Street (west)

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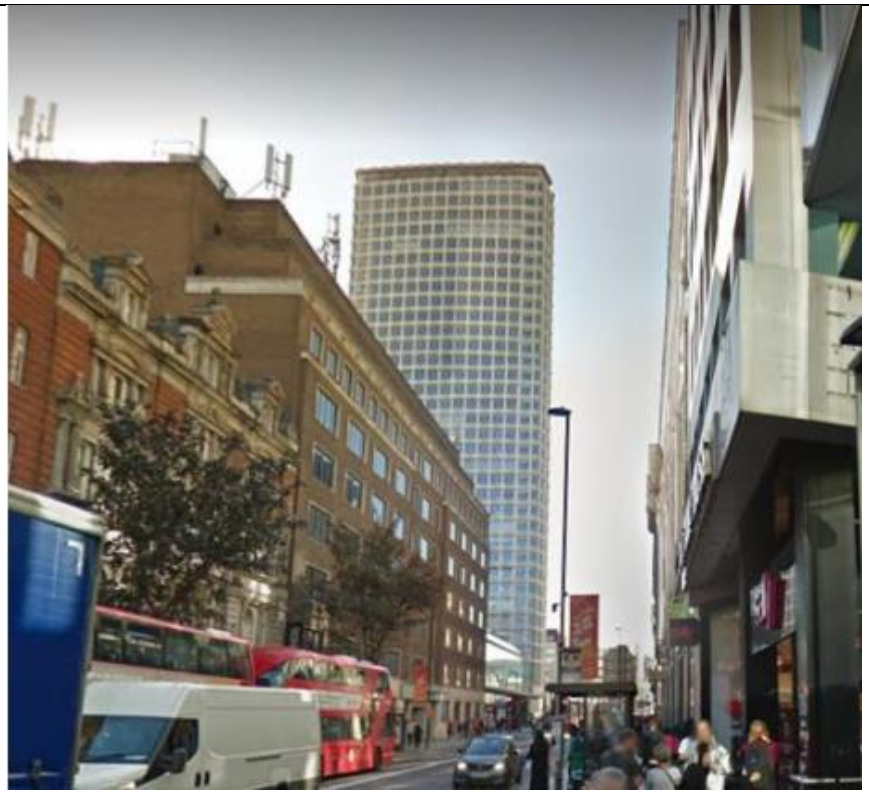

Figure 3 - View of the former Castlewood House from New Oxford Street (east)

The proposed site.

The site is located on the rooftop of Albion House, and the proposal comprises the installation of 3 no. antennas mounted on 3 no. 5.4m tripod support poles, 1 no. PSC enclosure and ancillary development thereto including Remote Radio Units (RRUs).

The application concerns the roof area of Albion House, a commercial building of ten storeys located on the south side of New Oxford Street.

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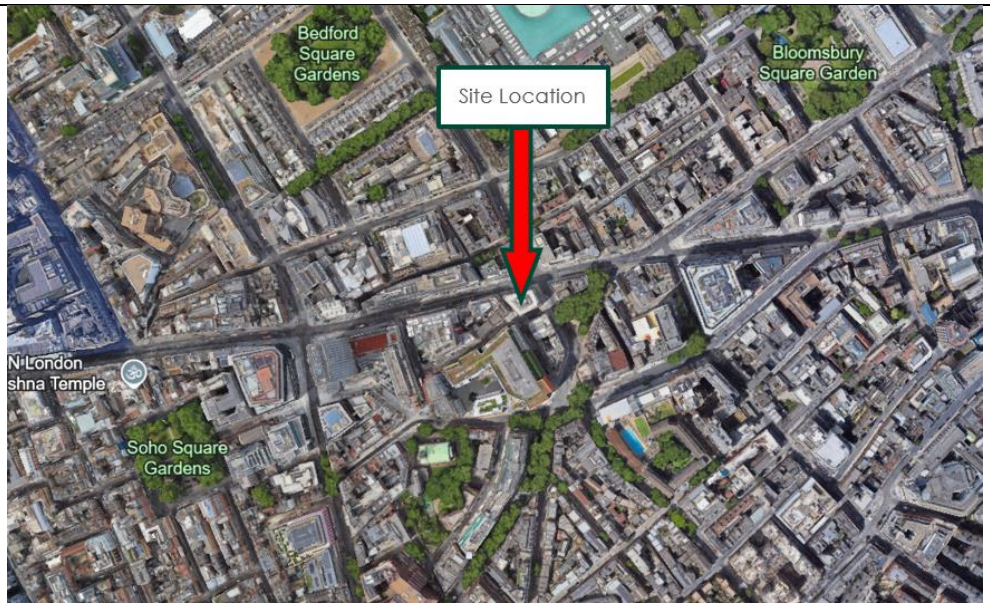

Map 1. Site Location

The application location is on the rooftop of Albion House. It is noted that the building itself is unlisted, however the site is within Bloomsbury Conservation Area and near to the Convent Garden Conservation area. It is also noted there are numerous listed buildings immediately adjacent to the host building, please see figures 4 and 5.

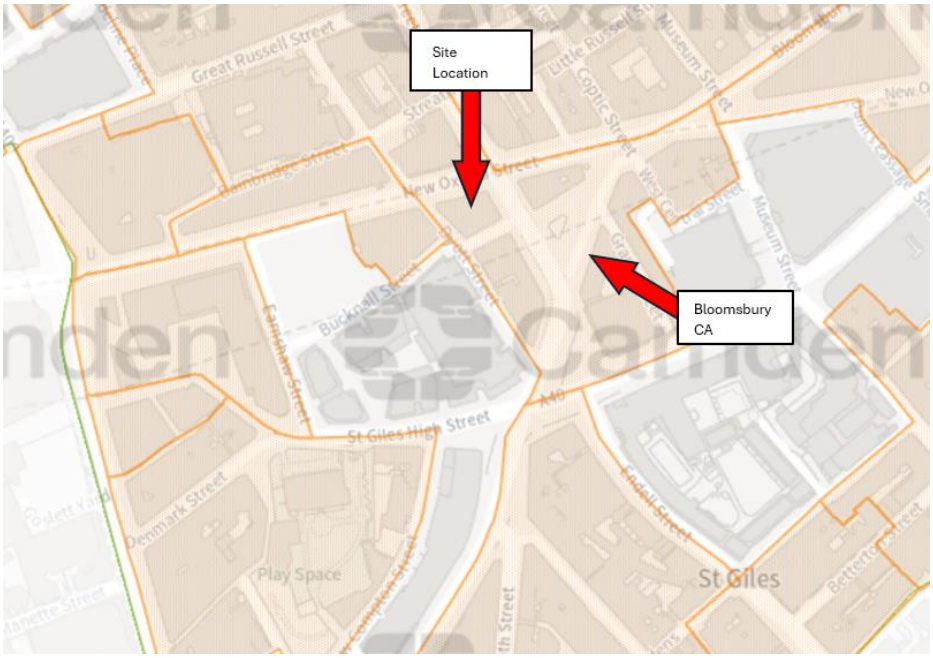

Figure 4 - Site location in the context of conservation areas

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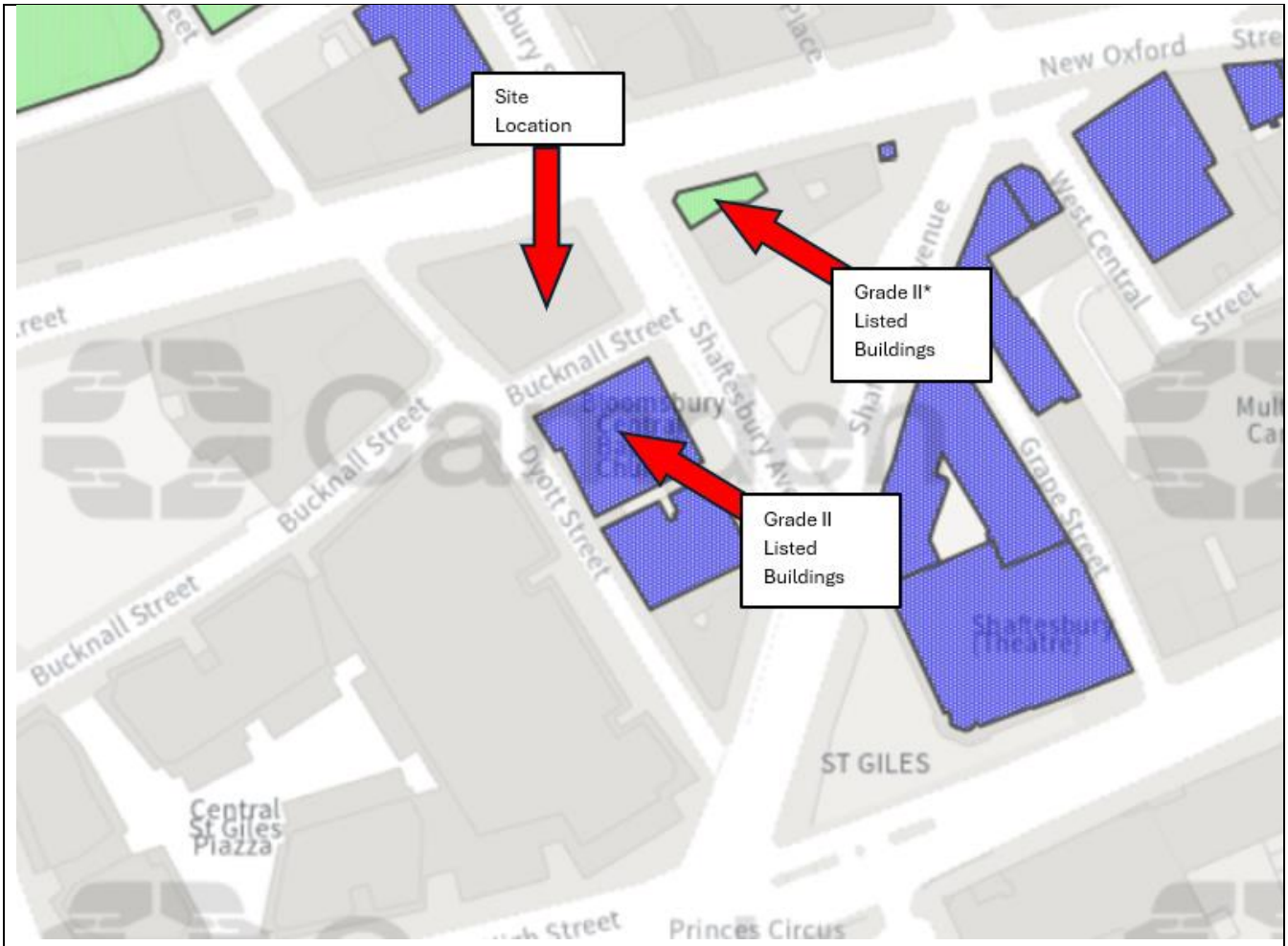

Figure 5 - Site location in the context of nearby listed buildings.

The site is located in Central London, a bustling area that attracts significant daily footfall from commuters, shoppers, residents, and tourists. Less than 200 metres from the proposed site is Tottenham Court Road Station, a busy London Underground hub that serves over 1 million passengers per week on average[2]. The proposed site is also in close proximity to key landmarks such as Oxford Street to the west, the British Museum to the north, and Covent Garden to the south, all of which draw large numbers of tourists annually. These visitors, as well as local residents and workers, will benefit from partial replacement coverage and capacity, along with enhanced 5G connectivity in the area.

Additionally, users of the numerous bus routes that serve the area will be supported by the critical replacement infrastructure at this site, helping restore reliable mobile digital connectivity. The loss of coverage from the Castlewood House site has specific radio implications, and the area remains a pivotal part of the West End, one of London's most

2 https://app.powerbi.com/view?r=eyJrIjoiZDgwZWY4NWMtZTFkMi00YzM2LThiMWQtNzg2ZTc2YjliNzM2IiwidCI6IjFmYmQ2NWJmLTVkZWYtNGVlYS1hNjkyLWEwODljMjU1MzQ2YiIsImMiOjh9

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economically vital areas. Furthermore, the recent completion of the Crossrail Station at Tottenham Court Road (Elizabeth Line) has further increased passenger numbers in the area, placing additional demand on the operator's network.

Figure 6 - The proposed site.

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Figure 7 - The proposed site.

In terms of the built environment, the area contains a variety of different styles of buildings both in the immediate vicinity and in the surrounding area. Additionally, the buildings in the immediate area vary in height and architecture with the application site being of a similar height to the former site at Castlewood House.

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New Oxford Street maintains a civic quality with some substantial Portland stone buildings on its northern side. In contrast Bucknall Street and areas to the south are more modern in style with the Central St Giles redevelopment being well known for its brightly coloured, ceramic façade. Centrepoint expresses a modernist rationality in its lower block (Centre Point House), with its landmark tower being much more architecturally expressive. Surrounding properties are primarily in commercial and residential use with ground floor retail and restaurant uses.

A photomontage pack has been prepared to demonstrate that the proposed radio base station will not be overly prominent in this location. The visual impact on the surrounding area and any heritage assets in the vicinity of the site will be less than substantial, given the small scale of the development their limited visibility from the designated heritage assets and will be outweighed by the significant economic and social benefits provided by the improved coverage and capacity. Taking the above into account, it is considered that, in accordance with the NPPF, the proposal will result in less than substantial harm to the significance of the conservation area. In line with paragraph 208, any harm should be weighed against the public benefits of the proposal.

As 5G is to deliver new technology, so too the infrastructure required is different than that necessary to provide the previous generations of connectivity.

An installation on the rooftop of Albion House will ensure that the partial replacement of 2G, 4G and 5G coverage and enhanced capacity for VMO2, in and around this area of New Oxford Street.

Planning History

2021/3402/P – Installation of 6 antennas, two 300mm transmission dishes, 2 equipment cabinets and ancillary development at roof level. – planning permission refused in March 2022.

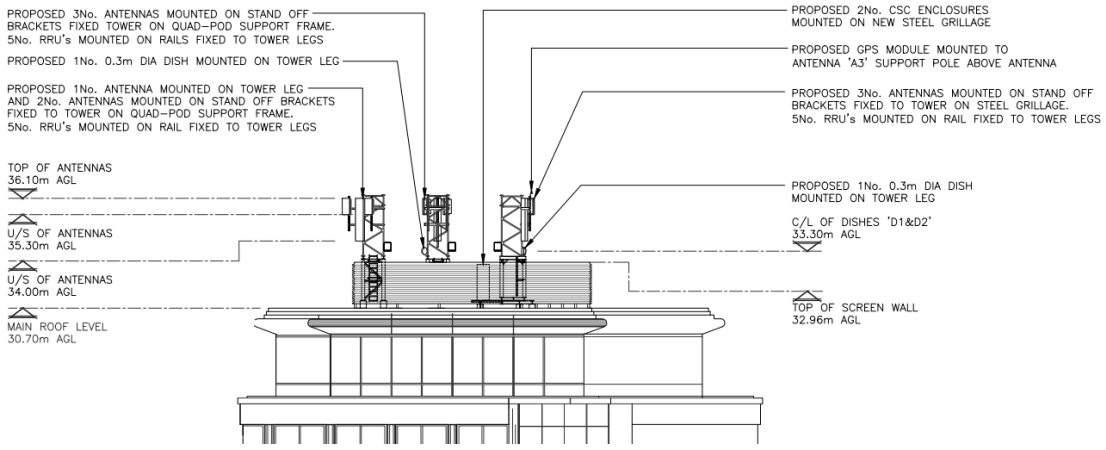

Figure 8: Proposed North East Elevation previous design failed under LPA ref: 2021/3402/P

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2020/1649/P - Installation of 9 antennas, 5 transmission dishes, 3 equipment cabinets, and ancillary development thereto. – Planning permission refused October 2020.

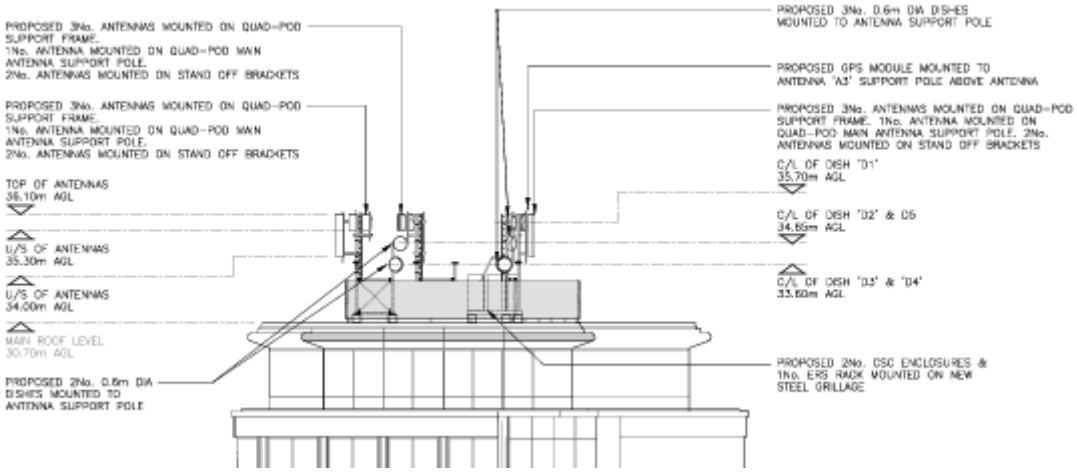

Figure 9: Proposed North East Elevation previous design failed under LPA ref: 2020/1649/P

Given the siting and size based reasons for refusal in the above applications, much due care and attention has been given to drastically reduce the size and appearance of the new proposed tripod support poles and accompanying antennas. This will be further discussed throughout the rest of this document.

Enclose map showing the cell centre and adjoining cells if appropriate:

The operator is seeking to provide partial replacement 2G, 4G and 5G coverage and improved capacity to the surrounding area for Vodafone to ensure high-quality customer experience is obtained as demands on the network increase and technologies change.

The 4G provision allows internet access, video calling, data down streaming, accessing social media networks and emailing to name just a few of the benefits. Therefore, to maintain high-quality indoor 4G services into this area would promote activity in line with the general population demand as the ownership of smart devices increasers. New 5G service provision will bring faster, more responsive and reliable connections than ever before.

Vodafone is a Mobile Network Operator (MNOs). The application proposals services not only the VMO2 (O2) but also the Mobile Virtual Network Operators (MVNOs)[3] which use the MNO networks by lease. Its shared function reduces the need for multiple installations. Vodafone represents more than 25%[4] of market share across the UK. It is therefore a fair assumption that more than 25% (excluding MVNOs such as Asda Mobile, Lebara, Talkmobile, Voxi which also

[3] https://www.which.co.uk/reviews/mobile-phone-providers/article/best-mobile-networks-overview-amhDx1F0z41t#who-are-thebiggest-uk-mobile-networks
[4] https://www.which.co.uk/reviews/mobile-phone-providers/article/best-mobile-networks-overview-amhDx1F0z41t#who-are-thebiggest-uk-mobile-networks

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use the Vodafone network) of the population in this immediate area obtain their mobile coverage and capacity (voice and data) from the VMO2 network and will be relying on them for mobile coverage at any one time.

Fact sheets on Radio Planning and Propagation and Digital Public Benefits have been attached to this application for reference.

This site is required to address capacity issues that are not evident in coverage plots. The radio planner has highlighted that during peak times, there is insufficient capacity to provide a high-quality, reliable service. This can lead to dropped calls and buffering, even if coverage appears sufficient in theory. Insufficient capacity results in a poor user experience, making the site necessary for both coverage and capacity reasons. The new site is required to address the capacity issues, as well as to provide replacement coverage due to the operator being served with Notice to Quit due to which it has to vacate the existing site on the rooftop of the Heathcoat House due to the proposed redevelopment.

The coverage plots below show the existing 4G coverage and the proposed coverage on the operator's network.

Coverage from the NTQ site after decommission.

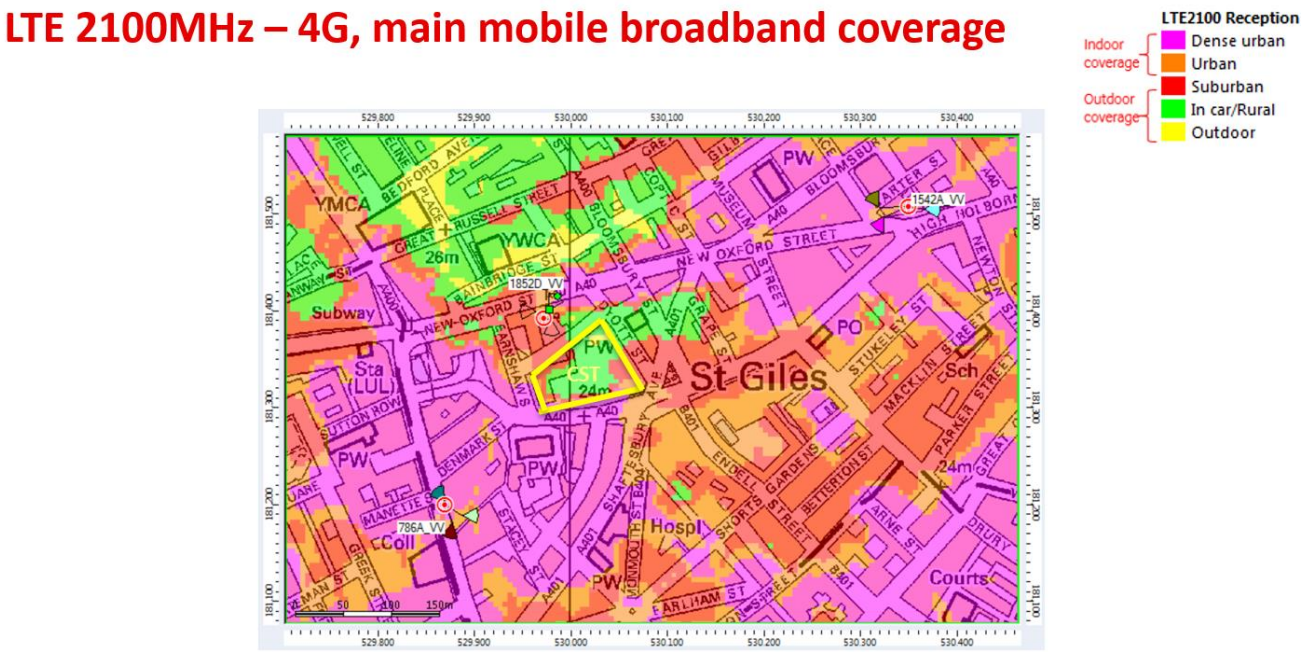

Figure 10 - Coverage currently as site is now off air

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LTE 2100MHz – 4G, main mobile broadband coverage

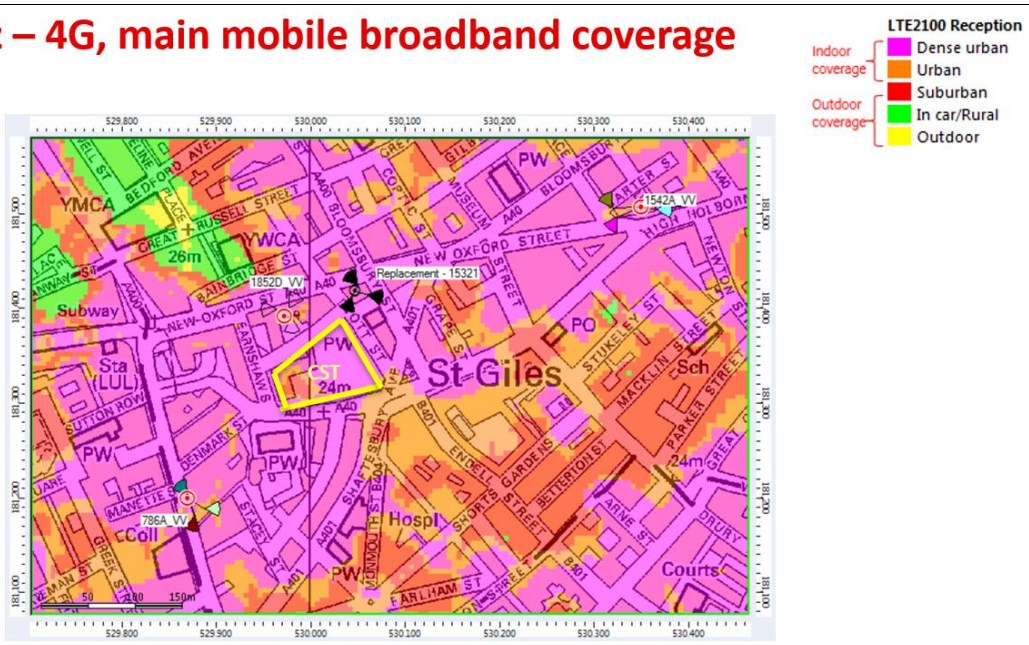

Figure 11 – Coverage map after the proposal

The above plots show the 4G coverage. However, the site will also provide new 5G coverage to this area. Although the 5G coverage is not shown on the plots, it will follow the 4G footprint, ensuring that 5G coverage will be available in a similar area as the improved 4G coverage.

The site is required to provide partial replacement of the lost coverage in this area around Albion Street. The installation will also provide improved capacity to the immediate area. Issues with capacity can lead to dropped calls and buffering, even if coverage appears sufficient in theory. Insufficient capacity results in a poor user experience, making the site necessary for both coverage and capacity reasons.

Base station uses radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, emails, pictures, web, TV and downloads. Without base stations, mobile will not work.

Individual base stations can only handle a certain number of calls or data downloads. If the number of calls or data requests exceeds the base stations capability, then local network users will experience a reduction in data download speeds and reduced call quality. We call areas without good coverage 'blackspots' and all mobile phone networks suffer from them. You can experience them wherever you are, even in cities with lots of base stations. Mobile network operators monitor call quality, so they are aware of any necessary improvements.

To keep up with growing demand we need to upgrade existing stations or build new base stations. Upgrading a site will increase the capacity of a base station. Capacity is the maximum data or calls that can be processed by a base station. An upgrade can be done in a number of ways, often by redeveloping the site to enable an increase in the number of technologies or increasing the number or height of the antennas.

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However, even after these upgrades, in some busy areas the demand for services can still exceed the capacity of the local base station. In this situation we may need to look into developing a new base station, resulting in improved service for our customers.

Type of Structure *(e.g. tower, mast, etc):* Rooftop Antenna		
Description: The proposal comprises the installation of 3 no. antennas mounted on 3 no. 5.4m tripod support poles, 1 no. PSC enclosure and ancillary development thereto including Remote Radio Units (RRUs).		
Overall Height:		36.10m
Height of existing building *(where applicable):*		30.70m
Equipment Housing: PSC Enclosure		
Length:		0.82 m
Width:		0.6 m
Height:		1.71 m
Materials (as applicable):		
Tower/mast etc – type of material and external colour:	Steel – Galvanised	
Equipment housing – type of material and external colour:	Steel – Grey	

Reasons for choice of design, making reference to pre-application responses:

Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (Paragraph 131) National Planning Policy Framework (Revised). It states:

'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'.

In keeping with the National Planning Policy Framework (NPPF) guidelines of using: "high quality communications infrastructure", the proposed design has been selected to minimise visual impact upon the surrounding environment.

The design of any communications infrastructure is dictated primarily by operational requirements and secondly by the development's setting.

From an operational perspective, the operators must ensure the following when devising a final design solution for any site:

- antennas are specifically orientated to transmit effectively and efficiently without signal being impeded;

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- dish links (if required) achieve a direct line of site connection with other base station sites within the network; and
- GPS modules achieve a direct satellite link.

To achieve this the operator undertakes panoramic assessment to determine what is the minimum height for transmission equipment to be located in a context of local topography and clutter, such as manmade or natural features, and in all cases the operator is committed to limiting the size and amount of apparatus to an operational minimum.

Technological advances (including 5G service provision) and additional demands on the operator's mobile network system in the area have meant that new antennas need to be installed to facilitate all the data that is required to be carried for mobile superfast broadband. This enables customers to continue to be able to use their handheld devices for the purposes in which they have become accustomed, and now rely on in the modern world we live in, a similar scenario to the reliance on gas and electricity.

A new site at this location is needed to provide partial coverage replacement for a former base station site located atop of Castlewood House at the junction of New Oxford Street and Earnshaw Street. It was a well-established shared mobile telecommunications serving the New Oxford Street, St Giles High Street and Tottenham Court Road Underground station areas. The reason behind the replacement is that the Landlord, due to redevelopment of Castlewood House, served a 'Notice to Quit' (NTQ), legally requiring the applicant to remove their equipment. The Landlord's proposal to redevelop the site for an 11-storey mixed used development was approved under LPA ref: 2017/0618/P. Without the replacement site the coverage in this cell area will be lost by the operator leading to a gap in their network.

The rooftop is a multistorey building and given the positioning and built up nature of the area the equipment will not be incongruous from ground level or at height. This is the least visually prominent design available to the operator that will provide the required levels of 2G/4G coverage to the target area as well as new 5G services.

The operator is proposing the most sensitive design currently available to provide the necessary coverage and capacity to the surrounding area. The slimline design should allay any concerns regarding any detriment to the Bloomsbury Conservation Area that was highlighted in previous refusals. Due to the shorter, slimmer and much less intrusive design, it should be considered that there would be next to no harm on the streetscene and accordingly any small amount would be outweighed by the public benefit of improving 5G connectivity anyways.

Due to all the technologies that will be available at this location (enhanced 2G, 4G and 5G), the proposed top heights of the antennas are essential to enable the antennas to clear the rooftop without clipping and reach the target coverage area. The antennas will exceed the tallest part of the building by 5.4 metres. If the antennas were to be any lower in height, then they would not be able to provide the necessary high-quality communications coverage which is required for everyday access to high-speed data in this area of New Oxford Street,

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which users of their handheld devices have come to expect in this 21st Century technological age.

The proposed rooftop antennas will be set back from the edge and their lower sections shrouded by the enclosure on the rooftop, thus minimising their appearance on the building and within the conservation area further.

In the previous reason for refusal (LPA ref: 2020/1649/P), the LPA state there is limited explanation for the overall design:

> *"The applicant has provided supporting information explaining why antennas are proposed as positioned 'vertically' as opposed to 'horizontally', however; there is limited explanation of the overall design of antennas or any other equipment which was raised at the pre-application stage and also supported by the Covent Garden Community Association consultation response"*

As mentioned already, the operator has re-designed the site to be as slim as possible with the least amount of equipment on the rooftop required to meet the network coverage demands associated with the NTQ project. The below explanation provides a clear and explained reason as to why the design of the equipment is as such, taking guidance and advise from the Code of Practice.

The height and position of the antenna on the building are so that they can be justified from a technical perspective as the antennas need to provide coverage to the specific target area, if they would be positioned further towards the centre of the rooftop, they would need to be taller in order to clear the immediate roof so as not to create signal clipping and reflection. The height of a proposed antenna has to be offset against its positions on the roof, whereby the closer to the centre of the roof of the building the more height that is needed to clear the immediate roof space in front of the antenna. The pole mounted antennas enable the operator to provide the multiple technologies and meet their full coverage requirements to the target area within the permitted ICNIRP guidelines. The below guidance from the Code of Practice for Wireless Network Development provides guidance on the design constraints an operator faces.

When looking at alternative options for the design of the equipment, we can discount alternative options based on technical reasons:

1. **Moving the antennas further back from the roof edge** - Coverage is already being compromised by 18 degrees downtilt, which is effectively reduced to 16 degrees by clipping. If the antennas were to be moved any further back then this would result in further clipping and public non-compliance ICNIRP issues. This would render the proposal unacceptable and unbuildable as it would fail ICNIRP compliance guidelines. The loss of service provision from clipping would also make the installation unviable. For these reasons, the antennas cannot be moved any further back from the roof edge.

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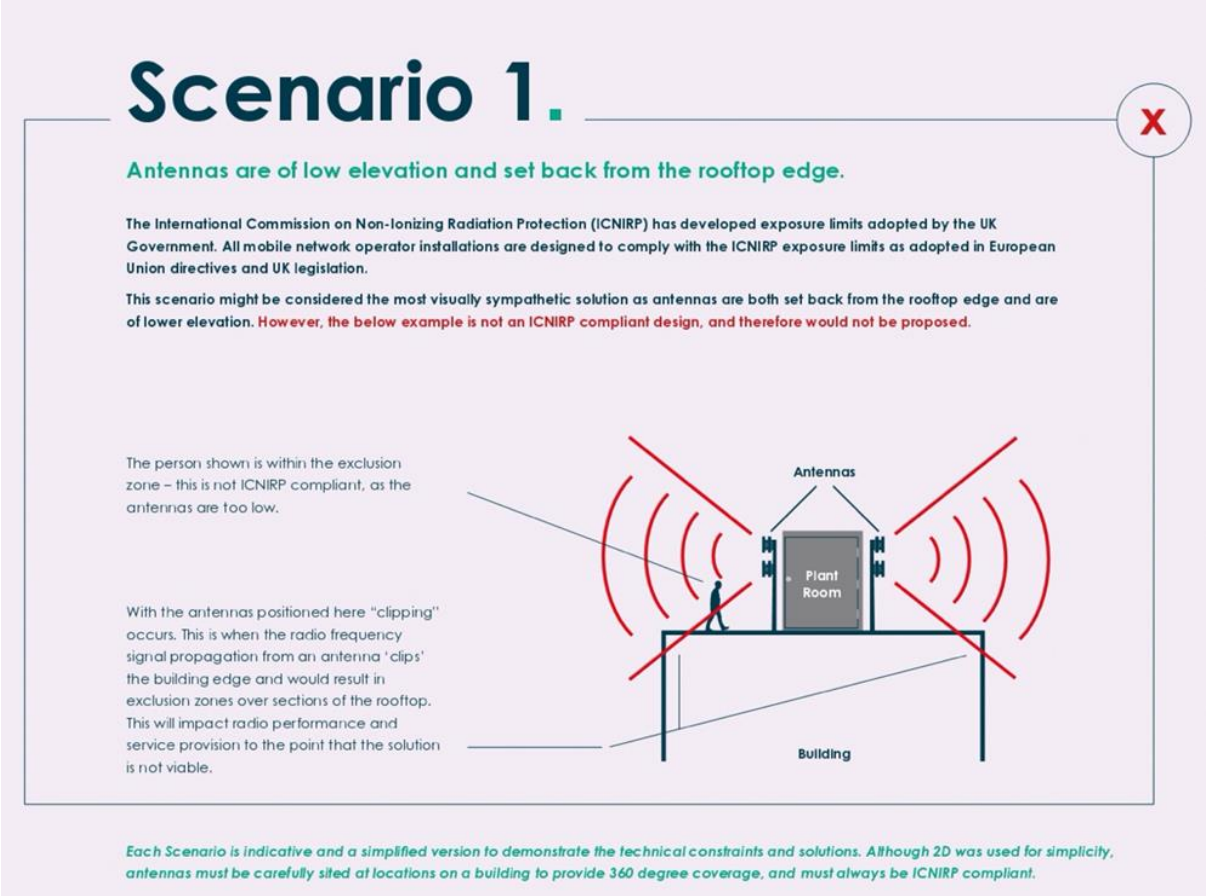
2. **Reducing height of antennas** – The antennas are already as low as they can be on this rooftop. They have been located on the towards the inner parts of the rooftop to minimise their visual appearance. If they were set any lower, they would cause unacceptable clipping as well as ICNIRP non-compliance both public and occupational. As a result, the height of the antennas cannot be reduced any further

Scenario 1 below demonstrates the issues of antennas of low height and set back from the rooftop edge. The installation is neither ICNIRP compliant nor appropriate for signal propagation as the signal clips the building edge and results in exclusion zones making the installation unviable. This is the exact scenario that would occur should the antennas be moved back away from the roof edge and/or if the antennas were reduced in height.



Source: Code of Practice for Wireless Network Development in England led by Department for Digital, Culture, Media and Sport.

3. **GRP around existing design** – Providing GRP around the design would require a bigger, bulkier design which would need to be significantly taller than the proposed antennas and their support poles in order to shroud them. There is no backcloth in which to colour the bulkier design to reduce the appearance. Mirror GRP design would make the apparatus appear more prominent and alien on this rooftop. The taller height would be even more prominent in the sight lines of the Grade II listed buildings in the

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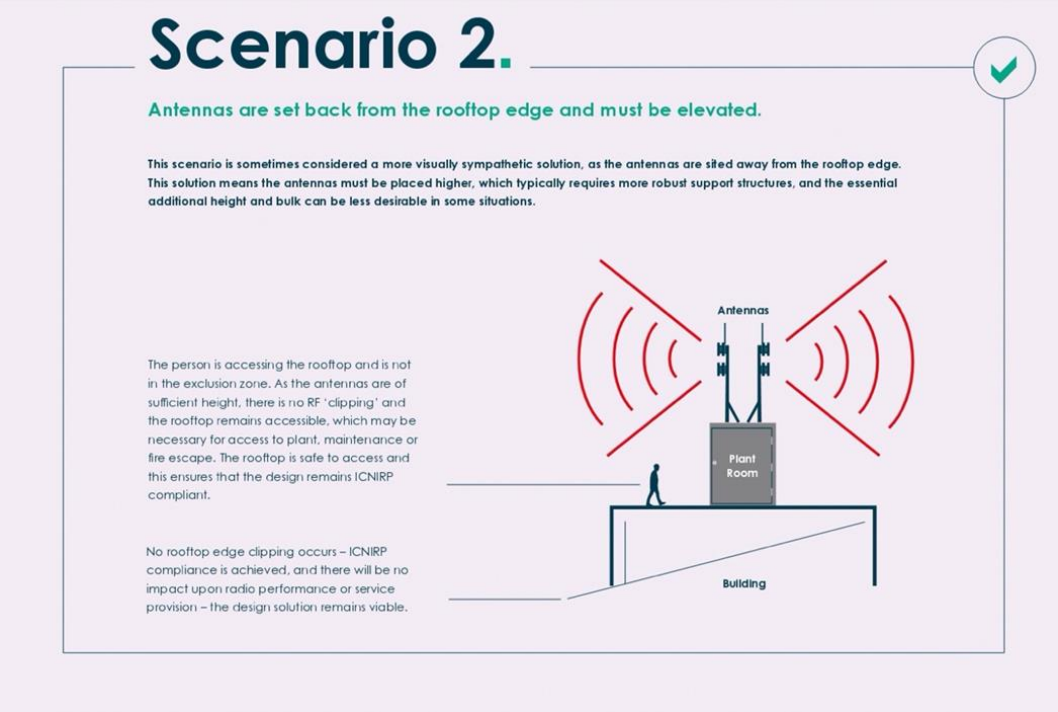
area, which would be more prominent. With some deployments (depending upon the frequency and generation) GRP can also impact radio frequency efficiency. There are also complications with GRP solutions in terms of structurally – GRP can act as a sail in certain locations and catch the wind so that presents a practical challenge that often makes it structurally unviable on particular rooftops.

4. **Moving antennas towards middle of the roof** – there is insufficient space to accommodate for antennas and their supporting steel work in the middle of the roof. The middle of the roof is cluttered with other rooftop paraphernalia, including air conditioning units. Even if there was room, a site this would require a much taller structure in order to avoid clipping the rooftop edges as explained and demonstrated above. Due to the location of the equipment being in the middle, a large stub lattice tower would be needed for structural reasons to host all the antennas, avoid clipping of the antenna signal and sterilisation of large areas of the roof due to ICNIRP compliance guidelines. Such a stub tower would need to be significantly taller than the proposed antennas and would be bulkier in order to structurally support the antennas at the elevated height required. This would lead to greater impact on both the Grade II listed buildings and the Bloomsbury Conservation area with a more prominent design than the current proposed solution. The stub tower would be more visually prominent along New Oxford Street and Shaftesbury Avenue, as it would be much more visible than the proposed application site. This would be in complete contradiction to what the Council is aiming to protect and would not minimise the visual impact.



Source: Code of Practice for Wireless Network Development in England led by Department for Digital, Culture, Media and Sport.

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5. **Face mounted antennas -** face mounting the antennas would result in a detrimental compromise to service provision due to the drop in height and what that means for radio frequency propagation. The antenna signal would not be able to clear the surrounding building clutter, effectively blocking the antenna signals from being able to operate effectively. Furthermore, locating the antennas in this position would not be ICNIRP compliant due to the presence of the neighbouring buildings within the exclusion zones. The buildings to the west would block the signal as it would not be able to reach over them. The latest technology antennas are heavy each one being some 50kg in weight, the feeder cables are also large and heavy and together with the supporting poles would put additional excess pressure on the walls which were not designed to take such weight or design. For these reasons face mounted antennas would not be a suitable design solution, would not be ICNRIP compliant and would not be able to provide the necessary coverage to the target coverage area, rendering this design solution unviable.

It is also proposed to install RRUs for the operator. This aspect of the proposal falls within the remit of 'ancillary development' and do not require permission in their own right. They are small for telecommunications apparatus, approximately the size of a shoe box. They are designed to act like a booster to make the antennas more efficient.

The 3 no. antennas mounted on 3 no. 5.4m tripod support poles, 1 no. PSC enclosure and ancillary development thereto including Remote Radio Units (RRUs) location on the rooftop mean the visual impact on the wider surrounding area and their view from the ground level will be minimised.

It is considered that views from and into the Bloomsbury Conservation Area, and other adjacent Conservation Areas would not be detrimentally affected by the introduction of this rooftop equipment. Given the small scale of the development and its location on the rooftop of a significantly tall building, the equipment will be out of the natural sight line from ground level. To see the proposed development from many vantage points at ground level, one would have to crane their neck in an unnatural stance.

The technical requirements of mobile communication operators such as the applicant are acknowledged in the National Planning Policy Framework which states that local planning authorities should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G) and full fibre broadband connections.

The proposed design whilst close to the roof edge is the most minimal design so far as practicable, taking into account the nature and purposes of the site. The snip below taken from the Code of Practice for Wireless Network Development in England also demonstrates the reasons why in cases such as this one. Notwithstanding the above, the antenna locations are also where they are so they can get 360 degree coverage so that is also a practical necessity. The number of antennas is needed for coverage and capacity reasons due to the nature of the NTQ project.

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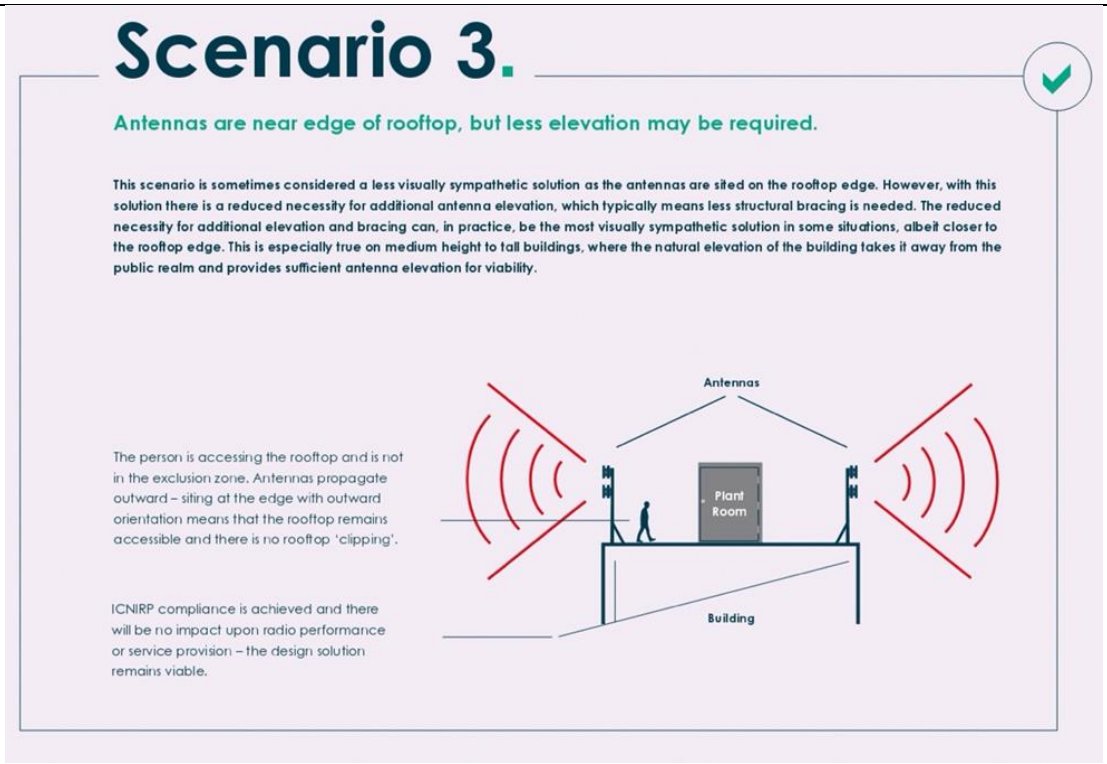

Source: Code of Practice for Wireless Network Development in England led by Department for Digital, Culture, Media and Sport.

Any physical object obstructing the propagation of radio signals causes a reduction in the signal strength reaching a customer's device. A common term for these objects is 'clutter' such as buildings, trees and hills. Generally, the higher the signal frequency the more it will be impacted by clutter. It is for this reason that the antennas are unshrouded, as the antennas are less able to propagate through immediate blockages including Glass Reinforced Plastic, which is what the shroud is made from. This affects the 5G antennas more so than any other technology. The latest 4G technology are also affected more so than older technologies by propagation and are therefore less efficient if they are shrouded. As such, the other antennas also need to be unshrouded to ensure that the latest technologies are provided to the surrounding area maximising their propagation.

If the antennas were proposed to be at a lower height, such as mounted the sides of the building or from a streetworks monopole, the antennas would not be able to clear the surrounding urban clutter and it would fail ICNIRP compliance which is unacceptable, meaning a mast would not be able to be brought forward. A lower height or moving the antennas away from the rooftop edge would cause clipping. To avoid this, a taller height would be required to enable to mast to be tilted downwards towards the street and allow for mobile connectivity. This would have a greater visual impact than the proposed design as it would be more visually prominent along New Oxford Street and Shaftesbury Avenue.

It is considered that views from and into the Bloomsbury and Convent Garden Conservation Area would not be detrimentally affected by the introduction of this rooftop equipment.

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Given the small scale of the development and its location on the roof of a significantly tall building, the equipment will be out of the natural sight line from ground level. To see the proposed development from many vantage points at ground level, one would have to crane their neck in an unnatural stance. The photomontages show the site would be visible from some viewpoints such as Bloomsbury Street looking south but it is important to remember, these are just still images of the proposed site, people will always be on the move and not often stopping to arch their neck up to view the site.

It is important to remember and consider, there are other angles within the surrounding area whereby there is no visibility of the site at all. Figures 12 and 13 show the view from the Grade II listed Bloomsbury Central Baptist Church, it can be seen the overhanging tree and proximity of the Church in relation to the antennas means the site will not be visible at all, protecting the visual amenity and designation of the Church.

Figure 12: View of Bloomsbury Central Baptist Church looking north west towards site (source: Googlemaps.com)

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Figure 13: View of Bloomsbury Central Baptist Church looking north towards site (source: Googlemaps.com)

It is therefore considered that the proposal before strike a good balance between environmental impact and operational consideration that has taken the concerns raised in earlier refusals, the slimmed down the tripod support poles and reduced number of antennas which all will lead to a much less impactful development.

The proposed height and design represent the best compromise between the visual impact of the proposal on the surrounding area, including the Conservation Area and meeting the multi technical requirements for the site. Taking all matters into account, it is considered that the proposed installation of telecommunications site on the rooftop at Albion House, to enable the enhancement of 2G, 4G and 5G service provision coverage to the surrounding area of New Oxford Street, would not appear out of place within its surroundings and would provide enhanced high-quality, reliable and secure coverage and capacity, delivering the capability for a multi hi-tech service and utilising an existing building.

Health and Safety - including ICNIRP compliance

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)

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

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unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.

When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.

In order to minimise interference within its own network and with other radio networks, Vodafone operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.

As part of Vodafone's network, the radio base station that is the subject of this application will be configured to operate in this way.

All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.

The telecommunications infrastructure the subject of this application accords with all relevant legislations and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services and instrumentation operated in the national interest.

4. Technical Justification

Reason(s) why site required e.g. coverage, upgrade, capacity

A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operator's network rollout program is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

There is a specific requirement to install radio base station at this location to enable enhanced 2G, 4G and 5G coverage and capacity for Vodafone, to the area of New Oxford Street. This ensures customers are able to continue to use their handheld devices for the purposes in which they have become accustomed, whilst on the move, as demands on the system for greater capacity augment as more customers access the data on the operator's network.

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Mobile connectivity and service is required where customers live, work and play. 5G coverage and superfast mobile broadband data capacity demand will continue to increase exponentially with the introduction of IoT (Internet of Things), machine to machine connectivity, automated transport/industry and other 'smart' applications. To this end, the existing infrastructure within the built environment has had to be reviewed and adapted as appropriate.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures and downloads. Without base stations, mobiles and devices will not work. Base stations are made up of three main elements. The cabin which contains the equipment used to generate the radio signal. A supporting structure such as a mast/pole which holds the antennas in the air and the antennas themselves.

Base stations are connected to each other and telephone exchanges by cables or wireless technology, such as microwave dishes, to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills, which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service. However, each base station can cover a certain area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular more base stations are needed to ensure continuous coverage.

Individual base stations can only handle a certain number of calls or data downloads. If the number of calls or data requests exceeds the base stations capability, then local network users will experience a reduction in data download speeds and reduced call quality. We call areas without good coverage 'blackspots' and all mobile phone networks suffer from them. You can experience them wherever you are, even in cities with lots of base stations.

To keep up with growing demand the operators need to upgrade existing base stations or build new base stations to improve the capacity. Capacity is the maximum data or calls that can be processed by a base station.

A new site at this location is needed to provide partial coverage replacement for a former base station site located atop of Castlewood House at the junction of New Oxford Street and Earnshaw Street. It was a well-established shared mobile telecommunications serving the New Oxford Street, St Giles High Street and Tottenham Court Road Underground station area. The reason behind the replacement is that the Landlord, due to redevelopment of Castlewood House, served a 'Notice to Quit' (NTQ), legally requiring the applicant to remove their equipment. The Landlord's proposal to redevelop the site for an 11-storey mixed used development was approved under LPA ref: 2017/0618/P. Without the replacement site the coverage in this cell area will be lost by the operator leading to a gap in their network.

The radio planner identified that this site is required to provide partial replacement coverage and capacity in the New Oxford Street area. The area currently struggles at peak times,

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severely impacting both outdoor and indoor service for customers. Therefore, this site is required to address lost coverage issues, as well as capacity issues. The insufficient capacity can lead to dropped calls and buffering, even if coverage appears sufficient in theory. Insufficient capacity results in a poor user experience, making the site necessary for both coverage and capacity reasons.

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).

In accordance with the licence obligations and advice in the National Planning Policy Framework and the Code of Practice in England the applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

- Upgrading their own existing base stations.
- Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location.
- Installations on existing high buildings or structures including National Grid pylons.
- Using small scale equipment; and finally.
- Erecting a new ground-based mast site – (1st) Camouflaging or disguising equipment. (2nd) A conventional installation e.g. a lattice mast and compound.

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution. New sites are only developed where there are no viable or accessible alternatives, or it is the local planning authority's preferred approach. The feasibility of the acquisition, build and maintenance of the site also needs to be taken into account.

In accordance with the above sequential approach, the proposal is to utilise a rooftop of existing building to install new radio base station in this location to provide enhanced 2G, 4G and 5G coverage service provision.

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
D1 – NTQ site	Rooftop of Castlewood House, 77-91 New Oxford Street, London WC1A 1DG	E: 529984 N: 181402	This is the NTQ site where the operator was originally located. An NTQ was served on the operators, the site has therefore been decommissioned and is currently off air. This site is no longer

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			available hence, the need for a replacement site.
D2 – Rooftop	Rooftop of St Giles in the Fields Church, High Street, London WC2AH 8LG	E: 529961 N: 181267	This building is too low to provide the necessary coverage to the target coverage area. The surrounding tall buildings would prevent the antennas from being effective and an additional installation would still be required. There is also insufficient space in the church spire to accommodate a radio base station.
D3 – Rooftop	Rooftop of Fairgate House, New Oxford Street, London WC1A 1HB	E: 530037 N: 181450	The building is lower than the surrounding properties. Therefore, the antenna signal would be blocked. This site is therefore not suitable.
D4 – Rooftop	Rooftop of Burtons, 118-132 New Oxford Street, London WC1A 1HL	E: 529850 N: 181399	This property is listed and therefore would have a greater impact on the character and appearance of a heritage asset than the preferred option which is not statutorily protected. The site also borders the next radio cell. A radio base station in this location would interfere with the existing radio base stations operation causing it not to work as effectively. This would be detrimental to the operation of the network in this area. As the site is on the edge of the search area, it would not provide as good a coverage as the preferred option. This site has therefore been discounted for these reasons.
D5 – Rooftop	Rooftop of 100 New Oxford Street, Saint Giles, Bloomsbury, London Borough of Camden, Greater London, WC1A 1DB.	E: 529909, N:181403	A site in this location would not provide significant uplift in coverage due to the operator's existing network configurations. As such, it would not provide the necessary coverage to the target coverage area for Vodafone. It has therefore been discounted for this reason. However, it should be noted that intend to utilise this roof as part of VMO2 and Vodafone's joint 3 site split cell solution to replace coverage lost after the removal of the radio base station from Castlewood House.

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D6 – Rooftop	Rooftop of 64-76 New Oxford Street, London WC1A 1BS	E: 530063 N: 181470	A site in this location would not provide significant uplift in coverage due to the operator's existing network configuration. As such, it would not provide the necessary coverage to the target coverage area for Vodafone. It has therefore been discounted for this reason.
D7 – Rooftop	Rooftop of Bloomsbury Central Baptist Church, 235, Shaftesbury Avenue, Saint Giles, WC2H 8EP	E: 530066 N: 181395	This property is listed and therefore would have a greater impact on the character and appearance of a heritage asset than the preferred option which is not statutorily protected. The surrounding buildings to the north and west would block the signal for 2 of the sectors and the mature trees to the east would block the other sector. In comparison, the chosen site can provide 360 degree coverage and not affect the fabric of the listed building.
D8 - Rooftop	Silva's, Shaftesbury Avenue, Saint Giles, Bloomsbury, London Borough of Camden, WC2H 8EB	E: 530122 N: 181387	The pitched roof design of the building would not be suitable to host telecommunications equipment for multiple operators as it would not be structurally stable. The operators need a flat surface with appropriate strength and support on which to attach their equipment, otherwise the antennas and supporting equipment which is heavy even without the antennas attached to them would cause the equipment to slide off the roof tiles, taking the batons with it causing the host buildings structural demise. The proposed site location roof benefits from being a flat roof with a relatively wide area to locate the equipment. It allows for the equipment to be located at its lowest height whilst providing coverage and resolving capacity issues to the area.
D9 – Streetworks	Footway along New Oxford Street, Saint	Various	The presence of underground services precludes the installation of a mast at

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	Giles, Bloomsbury, London Borough of Camden, WC1A 1AW		this location. Had a mast been possible, the surrounding large buildings to the north and south would block the signal. The application proposal can be built and will meet coverage objectives. The application site is well placed to deliver the essential infrastructure proposed to support high quality up to date connectivity in this busy area of London.
D10 - Streetworks	Footway along Shaftesbury Avenue, Saint Giles, Bloomsbury, London Borough of Camden, WC2H 8EH	Various	The presence of underground services precludes the installation of a mast at this location. Had a mast been possible, the surrounding large buildings to the east and west would block the signal. The application proposal can be built and will meet coverage objectives. The application site is well placed to deliver the essential infrastructure proposed to support high quality up to date connectivity in this busy area of London.
D11 – Rooftop	Shaftesbury Theatre, Grape Street, Saint Giles, Bloomsbury, London Borough of Camden, WC2H 8ED	E: 530127 N: 181358	This property is listed and therefore would have a greater impact on the character and appearance of a heritage asset than the preferred option which is not statutorily protected. The surrounding buildings to the north and east would block the signal for 2 of the sectors. In comparison, the chosen site can provide 360 degree coverage and not affect the fabric of the listed building.
D12 - Rooftop	Bucknall Street, Saint Giles, Bloomsbury, London Borough of Camden, WC2H 8AB	E: 530017 N: 181398	The pitched roof design of the building would not be suitable to host telecommunications equipment for multiple operators as it would not be structurally stable. The operators need a flat surface with appropriate strength and support on which to attach their equipment, otherwise the antennas and supporting equipment which is heavy even without the

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			antennas attached to them would cause the equipment to slide off the roof tiles, taking the batons with it causing the host buildings structural demise. The proposed site location roof benefits from being a flat roof with a relatively wide area to locate the equipment. It allows for the equipment to be located at its lowest height whilst providing coverage and resolving capacity issues to the area.
D13 - Rooftop	Tottenham Court Road, Earnshaw Street, Saint Giles, Bloomsbury, London Borough of Camden, WC2H 8AP	E: 529928 N: 181343	This building is too low to provide the necessary coverage to the target coverage area. The surrounding tall buildings to the east would prevent the antennas from being effective and an additional installation would still be required. In comparison, the chosen site benefits from being tall enough to provide 360 degree coverage without having its signal blocked.
D14 – Rooftop	Halifax, 118-132, New Oxford Street, Saint Giles, Bloomsbury, London Borough of Camden, WC1A 1HL	E: 529863 N: 181384	This option will be too close to the proposed cell (location 2 / figure 1 above) and will for the most part duplicate coverage & capacity for that cell rather than provide the new connectivity that is required for this cell. The search area has been carefully considered and designed to ensure there is limited to no overlapping of existing or proposed cells. Anything near to other proposed sites, such as this would not meet the coverage and capacity requirements, meaning a site would still be required elsewhere to provide the requirements.
D15 – Rooftop	63, St Giles High Street, Saint Giles, Bloomsbury, London	E: 530014 N: 181280	This building is too low to provide the necessary coverage to the target coverage area. The surrounding tall buildings to the east would prevent

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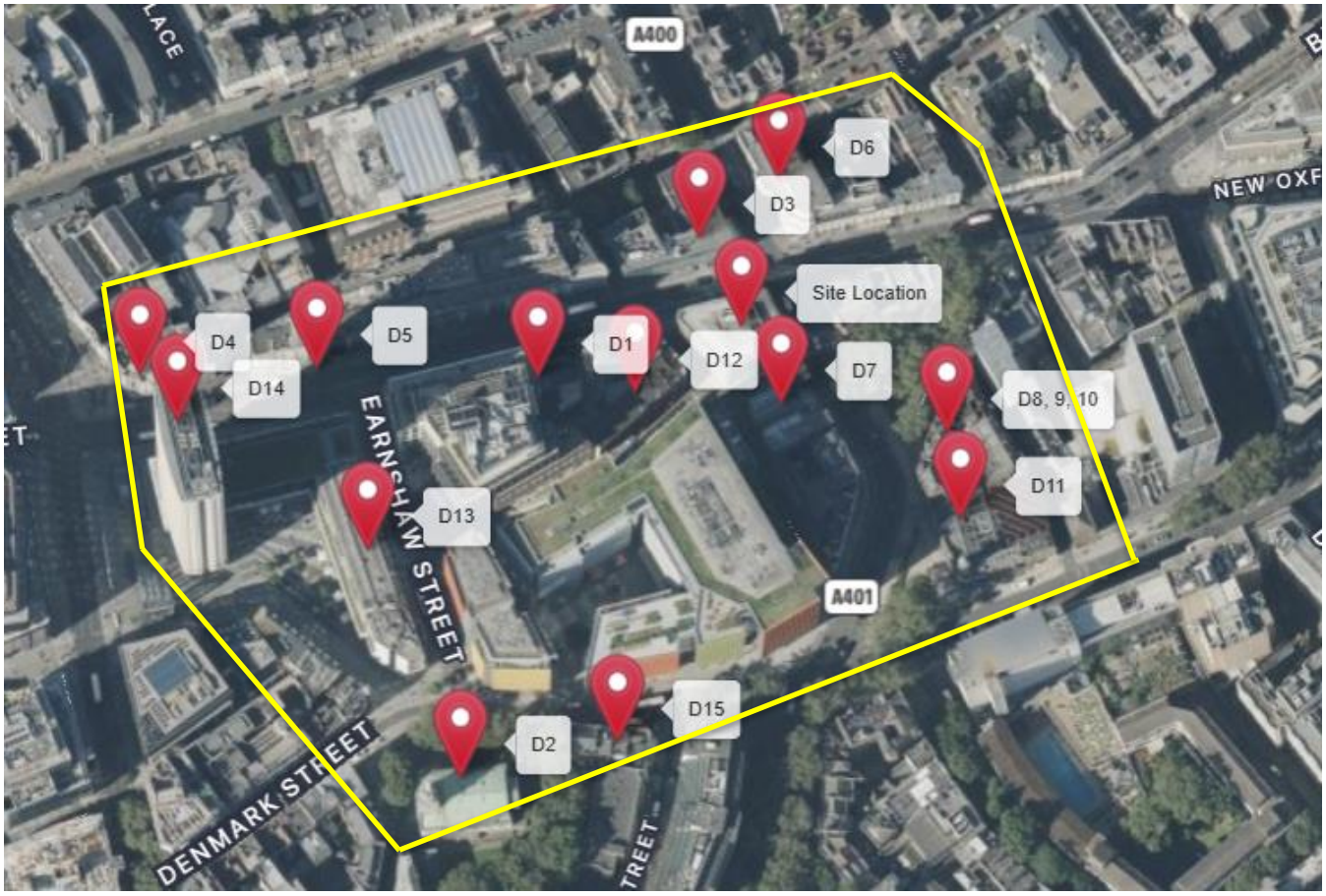
	Borough of Camden, WC2H 8DA		the antennas from being effective, the mature trees to the west would also block the signal and an additional installation would still be required In comparison, the chosen site benefits from being tall enough to provide 360 degree coverage without having its signal blocked.



Map 2. Search Area and Discounted Options.

If no alternative site options have been investigated, please explain why: N/A
Land use planning designations: The application site is located within Bloomsbury Conservation Area. Other nearby land-use designations:

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- Denmark Street Conservation Area – approx. 100m away.
- Seven Dials Conservation Area – approx. 100m away.
- Grade II Bloomsbury Central Baptist Church south of site
- Grade II 233 Shaftesbury Avenue Listed Building south of site
- Grade II* James Smith and Sons, Hazlewood House east of site
- Grade II 1,3 and 5 Bloomsbury Street north of site

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

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

It is not necessary to quote extensively from this document, but the following points are highlighted.

National Planning Policy Framework (December 2024)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The NPPF was updated in July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. The NPPF has been recently revised again in September 2023 with an update on policy on planning for onshore wind development in England and does not affect any parts relating to telecommunications. The NPPF has been revised again in December 2024, however, it did not affect any parts relating to telecommunications other than the paragraph numbers.

The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high-quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 119 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of *reliable* communications infrastructure for both economic growth *and social well-being*.

The NPPF continues to support the expansion of electronic communications networks at paragraph 119. It notes that policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. The economic and social benefits of providing high quality and reliable

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communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF makes reference to 5G:

'*Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)…*'

With the above in mind, the Government is already forward thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

Paragraph 120 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 121 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining 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.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or 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 the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 39 it 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…*permission in principle*, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible*'.

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 85 states:

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'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation[44]'…

Footnote 43 of the NPPF states:

> *'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'.*

Section 16 of the NPPF refers to conserving and enhancing the historic environment. Paragraph 207 explains how local planning authorities and applicants should assess their proposals against the historic environment:

> *'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation'.*

Paragraph 208 of the NPPF states Local Planning Authorities assess level of significance of any heritage asset that may be affected by a proposal:

> *'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal'.*

The NPPF goes on to provide guidance on considering the potential impacts of development on heritage assets. Paragraph 208 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

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Paragraph 215 retains advice in the previous NPPF relating to the degree of harm. It states that '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.

Code of Practice for Wireless Network Development in England (March 2022)

The Code of Practice provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The aim of the Code of Practice is to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

The Code of Practice covers all forms of wireless infrastructure development, including mobile masts and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Best Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

The CoP sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraph 8 of the revised Code acknowledges that connectivity is vital to enable people to stay connected and that fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code continues to acknowledge that as the demand for mobile data in the United Kingdom is increasing rapidly, and that it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

The Government recognises the role of Planning in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity.

Paragraph 13 of the Code continues to echo the NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth. More specifically that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G) in order to support economic growth across the country.

The CoP sets outs 'How wireless networks function.

Para. 16 states *"Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much data can be carried over the network. Depending on the radio frequencies used, base stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth".*

Para. 17 sets out that *"Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications".*

The CoP establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support by.

Para. 18 states *"Operators should develop their networks and install wireless infrastructure according to the following principles and commitments:*

- ***Site sharing and use of existing infrastructure**: make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites 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.*
- ***Consultation with local planning authorities, local communities and other stakeholders**: participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see Pre-application consultation with local communities below).*

- ***Standardised and high-quality approach to planning applications, and the notification procedure****: provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements. Ensure planning submissions are of high-quality and provide the necessary evidence to support the application (as per the NPPF).*
- ***Prompt responses to enquiries****: respond to complaints and enquiries within a timely manner (see Review and Enquiries section below).*
- ***Siting and Design****: wireless infrastructure should be deployed in accordance with the guidance set out within this Code of Practice. Where appropriate, equipment should comply with the principles set out in the NPPF and consider any local planning policies, including any local and national design codes. When located in protected landscapes and other designated land, the sensitive nature of these areas must be considered.*
- ***Removal of redundant equipment and site restoration:*** *ensure that when infrastructure is upgraded, any equipment that is made redundant by the upgrade, such as brackets, is removed to benefit the local environment. Where a whole site is no longer in use, the site should be restored to its original state.*
- ***Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure levels guidance****: as required by spectrum licences, comply with international guidelines for limiting exposure to electromagnetic fields (EMF) - including, as set out in the NPPF, providing a statement that self-certifies that ICNIRP guidelines will be met with all applications (see Annex C).*

Paragraph 19 states that Local Planning Authorities should demonstrate their support by:

- ***"Incentivising connectivity****: support the expansion of telecommunications networks and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.*
- ***Facilitating sites****: engage with operators when new sites have been proposed and discuss site requirements.*
- ***Engagement with operators****: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.*
- ***Information and communication****: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)".*

The added emphasis on support from Local Planning Authorities in the deployment in digital infrastructure is even more evident in the revised CoP. The CoP recognises the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that *'In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement'.*

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Siting and Design Principles

The government's objective is to deliver high quality, reliable wireless infrastructure whilst ensuring the impact of new network development is kept to a minimum. The siting and design of wireless network infrastructure is central to achieving this. The CoP acknowledges that *'good siting and design principles should apply to all wireless network development and take into account any site-specific considerations and context. Both can create better places in which to live and work and help make development acceptable to communities.'*

The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity requirements. The guidance includes at Para. 22 *'the choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible'*.

Para. 23 confirms that there should be a ***'presumption in favour of facilitating sustainable network development'*** and, as such, operators and local planning authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and find viable solutions to deployment issues (emphasis added).

Paragraphs 24 - 27 sets out general siting and site selection principles which Operators should consider. The CoP acknowledges at Para. 24 that *'Operators use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G, 4G and now 5G. Once an operator has identified a requirement for a new cell site, a suitable site needs to be found. Elements that make a site favourable include: having existing or ready access to a power supply, access to fibre optic cables, vehicular access, and, other buildings and development which may provide a level of existing screening. Operators will typically look to upgrade existing infrastructure prior to considering a new deployment, in particular for initial 5G deployment'*.

Para 25 notes that *'When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to identify potential options which meet their requirements. Operators should follow these general siting and site selection principles:*

- *Installation on existing buildings and structures.*
- *Erecting new ground based masts.*
- *Camouflaging or disguising equipment where appropriate.*
- *Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage); and*
- *Mast and/or site sharing (including redevelopment of a site to enable upgrade or*
- *sharing with another operator)'*.

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Para. 26 highlights that the installation of all wireless infrastructure requires a balanced approach between the technical needs and constraints of the proposed site and the potential impact of the development. The three key technical and operational considerations for installation sites are:

- **Coverage**: wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.
- **Capacity:** where existing network infrastructure can no longer meet the demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.
- **Backhaul**: the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.

Para 27 requires that Local Planning Authorities consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. Para. 27 further considers that in general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations.

In respect of 'Design', the CoP at Para 28 acknowledges that the siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact including.

- **Protecting visual amenity**
- **Mitigating visual impacts**

Para. 29 acknowledges that these factors along with location and the coverage and capacity requirements can influence the type of infrastructure structure that is deployed and requires that '*planning authorities should be aware of these constraints when considering proposals. In particular:*

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetworks monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*
- *In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage. The location of masts can sometimes be dictated by access to transmission links back*

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to the operator's main network and proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain'.

The CoP establishes radio equipment housing (cabinets) principles. The CoP at Para. 30 states that "*cabinets protect radio transmitters and receivers, provide the power source for mobile equipment, and are connected to antennas via cables. Equipment cabinets are likely to be needed at most sites. The cabinets must be of sufficient size to facilitate hosting various operating equipment whilst also allowing air circulation to reduce the potential for overheating*". The CoP establishes the planning and visual considerations for siting radio housing. These include:

- Colouring
- Siting on highways and footways:
- Highway safety:
- Listed buildings/ scheduled monuments and Conservation Areas:
- Access
- Trees

Natural Environment and Heritage Asset Guidance

The Code reiterates the principles of the NPPF in relation to heritage assets, in that planning authorities should assess the significance of heritage assets affected by proposed development and take this into account to ensure that any conflict between the conservation of the heritage asset and its setting and any aspect of the proposals is avoided or minimised.

The revised Code illustrates that mobile connectivity helps in the delivery of public services e.g. to access Central and Local Government via online services, acknowledging that lives are more likely to be saved when a 999 call is made from a mobile than from a landline, Telehealth is becoming increasingly important and text message reminders also improve compliance with medication and keeping NHS appointments.

Good mobile connectivity also promotes sustainability e.g. it reduces the need to travel and thus carbon emissions. The Code continues to support mobile telecommunications network as it is seen as a crucial piece of national infrastructure in economic, community and social terms.

The Code reiterates that the digital infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. Great emphasis is placed on the need to work collaboratively between stakeholders to ensure key digital network deployment and therefore supporting economic growth.

Local Policy

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Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

Camden Local Plan (Adopted July 2017)

The Camden Local Plan sets out the Council's planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). It ensures that Camden continues to have robust, effective and up-to-date planning policies that respond to changing circumstances and the borough's unique characteristics and contribute to delivering the Camden Plan and other local priorities. The Local Plan will cover the period from 2016-2031.

Camden's planning strategy has been prepared in the context of the social, economic and environmental changes it faces as a borough. Some of the key challenges and issues we need to address in its planning policies are outlines below:

- Adapting to Camden's growing population and to social change.
- The supply and cost of housing in the borough.
- Maintaining a successful economy and improving opportunities.
- Inequalities.
- Health and wellbeing.
- Improving transport.
- Quality of the environment.
- Crime and safety.

The Vision set within the Camden Local Plan states:

"We want to make Camden a better borough – a place where everyone has a chance to succeed and where nobody gets left behind. A place that works for everyone."

Policy E1 – Economic Development

The Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses.

Paragraph 5.10 refers to digital infrastructure:

"The Council recognises the importance of digital infrastructure in enterprise development and expects electronic communication networks, including telecommunications and high speed broadband, to be provided in business premises."

Policy D1 – Design

The Council will seek to secure high quality design in development. The Council will require that development:

- Respects local context and character.
- Preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage.
- Compromise details and materials that are of high quality and complement the local character.
- Preserves strategic and local views.
- Carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Policy D2 – Heritage

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designated heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- The nature of the heritage asset prevents any reasonable uses of the site.
- No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation.
- Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible.
- The harm or loss is outweighed by the benefit of bringing the site back into use.

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of

conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

- Require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.
- Resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area.
- Resist development outside of a conservation area that causes harm to the character or appearance of that conservation area.
- Preserve trees and garden spaces which contribute to the character and appearance of a conservation area, or which provide a setting for Camden's architectural heritage.

There are no policies directly addressing telecommunication matters within the Local Plan.

Camden Planning Guidance – Digital Infrastructure (Adopted March 2018)

This guidance supports the Camden Local Plan policies E1 Economic development and DM1 Delivery and monitoring. One of the Council's priorities for delivering growth and harnessing its benefits for the borough is securing infrastructure and services to meet the needs of Camden's growing numbers of residents, workers and visitors. The Council aims to enable improved internet access through the acceleration of high-speed connectivity, including public wireless systems. Policy E1 specifically expects the applicants to provide electronic communication networks, including telecommunications and high-speed broadband in business premises. This guidance sets out further information on the Council's approach.

Key messages set within the document:

- The Council will support the expansion of electronic communications networks, including telecommunications and high-speed broadband.
- Building Regulations require physical infrastructure to support high-speed broadband in all new building developments and major renovation projects.
- The Camden Local Plan specifically requires high speed digital infrastructure in all employment developments.
- The Council will require applications for telecommunications development to be supported by the necessary evidence to justify the proposed development.

Paragraphs 11 – 15 refers to telecommunication equipment, the most relevant parts are below.

Para 11 – "*Proposals for the installation of telecommunications equipment such as masts, cabinet boxes and satellite dishes, erecting antennae or other such structures will be determined in accordance with the National Planning Policy Framework (NPPF).*"

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Para 12 – *"In line with the NPPF, the Council will support the expansion of electronic communications networks, including telecommunications and high-speed broadband."*

Para 13 – *"In particular, the Council will aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need for a new site has been demonstrated to the satisfaction of the Council. Where new sites are required, equipment should be sympathetically designed and appropriately camouflaged where possible."*

The London Plan 2021

The London Plan 2021 is the new Spatial Development Strategy for Greater London and was adopted in March 2021 and is now part of the statutory development plan. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.

The Foreword of the Plan states:

'And it's about making London a city with clean air for our children to breathe, and a pioneering smart city with world-class digital connectivity supporting more digital devices to improve the lives of Londoners and enable businesses to thrive.'

Chapter 1 of the London Plan deals with 'Planning London's Future - Good Growth'. Para.1.0.1 relates to 'Good Growth' that is *"socially and economically inclusive and environmentally sustainable and underpins the whole of the London Plan and each policy. It is the way in which sustainable development in London is to be achieved"*.

Para 1.0.10 is within the Planning for Good Growth section of Chapter 1 and states:

'Planning for a 'smarter' city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners.'

Para 1.1.4 under 'Building Strong & Inclusive Communities' includes: *'… social, physical and environmental infrastructure that meets London's diverse needs is essential if London is to maintain and develop strong and inclusive communities.'* The corresponding policy in GG1 Building strong & inclusive communities states:

> *'Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:'*
>
> *'… (C) provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.*

(D) seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city…

… (I) support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.'

Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities.

Para. 1.3.1 states *'The mental and physical health of Londoners is, to a large extent, determined by the environment in which they live. Transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by the planning system, and local authorities are accordingly responsible for planning and public health'*. During the Covid-19 pandemic there was a much greater reliance on mobile digital connectivity to stay connected with family and friends and enabled working from home and home-schooling with many people continuing to work from home. Without the infrastructure which enables reliable connectivity, we could not stay connected.

Policy GG5 relates to 'Growing a good economy. The supporting text states:

'…..London is the engine of the UK economy, accounting for more than a fifth of the country's economic output. Its labour market, housing market and transport links are interconnected with the Wider South East city region, which shapes the development of the whole of the UK. Together, London and the Wider South East contribute a full half of the country's output. London has unique strengths in specialist fields like finance, business services, technology, creative industries and law, as well as attracting tourists from around the world, providing a gateway to the rest of the UK. The wealth this generates is essential to keeping the whole country functioning, but the benefits of economic success are not shared evenly within London itself.'

'… Projected growth towards 6.9 million jobs by 2041 provides an opportunity to strengthen London's economy for the future, and doing so will depend on increasing diversification. The Central Activities Zone and Northern Isle of Dogs will remain vital to London's economic success, but growth in town centres across London will be equally important, alongside supporting local regeneration, investment in Opportunity Areas and enabling access to a wide range of jobs. Reasonably priced, good quality employment space will be needed across London to make this happen'.

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Para 1.5.4 states 'The right infrastructure is also required to help businesses succeed across London. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processes, opening up new markets and allowing more flexible working.'

GG5 'Growing a good economy' states:

To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

> *'… (D) ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth.*
>
> *(E) ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning…*
>
> *… (H) recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success.'*

The New London Plan creates the strongest policies ever for Digital Connectivity.

Policy SI 6 states:

A - To ensure London's global competitiveness now and in the future, development proposals should:

1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users.

2) meet expected demand for mobile connectivity generated by the development.

3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation.

4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

Para 9.6.1 states that ***'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' (*emphasis added*).*

Policy HC1 relates to Heritage Conservation and Growth and states:

C – Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Levelling Up the United Kingdom (February 2022)

Digital Connectivity is a focus area, and the mission is 'By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population'. This mission is focused on improving digital connectivity.

Digital connectivity: The case for action

The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working. However, there are significant spatial disparities in the quality of broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas. Infrastructure is only part of the picture: economic benefits will only materialise if businesses and workers have the skills to take advantage of improved infrastructure.

More broadly, high quality digital infrastructure can deepen local labour markets through remote working, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas. Existing specialisms in the UK regions have the potential to generate strong tech clusters, such as fntech in Scotland and Wales, e-Commerce in the North West and Northern Ireland, and Agri-Tech in Yorkshire and the Humber. The sector also provides opportunities for raising living standards – median earnings for the sector are 50% higher than the UK average.

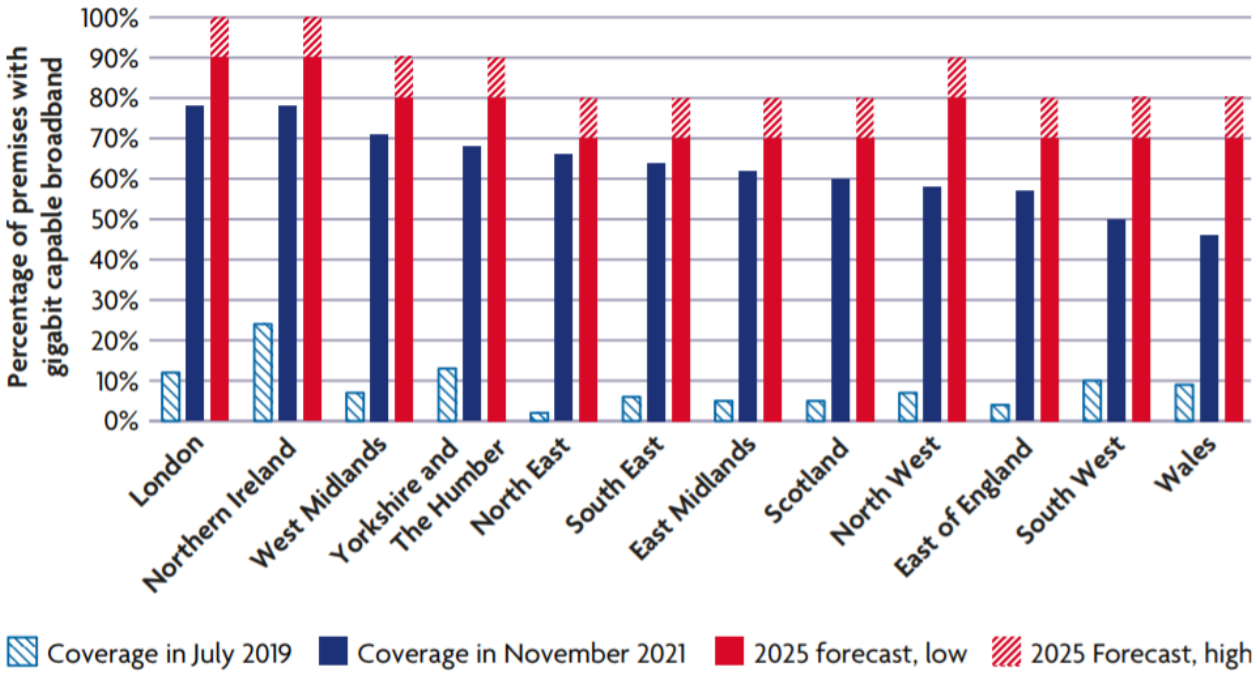
The policy programme

In 2020, the UK Government published the National Infrastructure Strategy, committing to providing £5bn in public funding to roll out gigabit broadband to at least 85% of the country by 2025, and subsequently to as close to 100% as possible, working with the private sector.

Public investment will target premises that are hardest to reach and which would otherwise not be provided for by the private sector, ensuring no areas are left behind. Gigabit coverage

has increased from 10% to over 60% in less than two years. Since 2019, coverage has improved across the UK, and the UK Government anticipates the following additional improvements to be delivered as a minimum by 2025, as set out below.

Figure 3.1 Gigabit coverage improvements, UK countries and regions, 2019, 2021 and 2025 (forecast)



Source: Levelling Up the United Kingdom.

In 2023, the UK Government published the Wireless Infrastructure Strategy. This aims to chieve the objectives that have been set out by the Government. This reviews how far the private sector will go to deliver wireless infrastructure across the country and determine whether there are any market failures in places that need to be addressed, and how the UK Government could tackle these.

We must ensure that people have sufficient digital skills to reap the benefits and prosperity arising from the digital economy. In 2020, the UK Government introduced a new digital skills entitlement, giving adults with low or no digital skills in England free access to new digital skills qualifications based on employer-supported national standards. The UK Government continues to work with local leaders to develop Local Digital Skills Partnerships. These collaborative partnerships are now operating in seven regions across England, with an eighth formally launching in Hull and East Yorkshire in early March. The UK Government will work with devolved administrations to consider how best to share the insights and evaluation of the programme to help build digital skills capability across the UK.

UK Wireless Infrastructure Strategy (April 2023)

The UK Wireless Infrastructure Strategy, published in April 2023 aims to achieve the objectives that have been set out by the UK Government. The next decade will see seismic changes both in terms of what wireless connectivity can deliver and how we can use it. The economic and social benefits from these changes promise to be vast, from supercharging growth to accelerating our transition to net zero. But these benefits can only be achieved with concerted action from government, industry, and others. This strategy sets out the Government plan to do that.

In the last 5 years, UK government policies have driven impressive progress in the deployment of world class fixed and wireless networks across the whole of the UK, removing regulatory and practical barriers to deliver stronger growth, more jobs, and better public services in every corner of the country.

- through our £1 billion deal with the mobile network operators, we are supporting rural communities by ensuring that 95% of the UK landmass have 4G coverage by 2025. This currently stands at 92%
- we have made substantial progress with 5G, too. Last year, we met our ambition for the majority of the population to have access to a 5G signal by 2027 5 years early through the deployment of basic, non-standalone 5G using existing 4G networks to deliver increased network capacity.

By building world-class, secure digital infrastructure networks, the Government can meet its vision they set out in their Digital Strategy for a competitive and innovative digital economy. This will play an important role in:

- **underpinning other new technologies** - the next decade will see the development and maturation of transformative technologies from AI and self-driving vehicles to digital twins, which will drive demand for advanced wireless connectivity.
- **transforming public services** - there are also significant benefits for improving our public services, supporting smart cities which are cleaner and less congested and delivering connectivity to our schools and hospitals that will provide better, more interactive lessons and personalised healthcare.

By transforming our economy, widespread adoption of 5G can bring a cumulative productivity benefit of £159 billion by 2035, driving growth and inward investment, and improving lives for communities in every corner of the country.

However, there are challenges we need to address to ensure the UK can realise these benefits, as the economics of investing in wireless networks are changing:

- There is still need to overcome uncertain demand for 5G-enabled services and continuing practical barriers to network deployment need to be overcome.
- Many of the economic benefits we have identified require significantly higher quality connectivity than is likely to be deployed in national public networks.
- 5G roll-out in the near term is likely to focus on urban areas, where the commercial returns are more certain.

- Research we commissioned shows significant variation in the quality of mobile coverage in different parts of the country over the next decade - economically important areas like Freeports and industrial parks could be underserved.

Market dynamics are also changing:

- **Demand is uncertain** as connectivity moves beyond smartphones to enable an array of new, innovative use cases, businesses and the public sector will need to navigate an increasingly complex ecosystem to get the connectivity they require. As many businesses and local authorities do not yet clearly understand the benefits 5G offers or how they can effectively deploy 5G-enabled services to realise these benefits, there is no clear articulation of the demand for higher quality services. In turn, this makes it more challenging for providers to make the business case for investment.

Through this strategy, the UK government set out a new policy framework with 6 key steps to do just that and ensuring that the UK maximises the potential of advanced wireless networks over the next decade, securing our international competitiveness for the future and driving economic growth across the UK.

1. Ensuring good connectivity for all

As networks are upgraded with 5G technologies over the next decade, 4G will continue to play an important, albeit diminishing, role in providing mobile connectivity across the UK.

Coverage reporting also needs to improve so that it more accurately reflects consumers' actual experience, equipping them with the information they need to choose the right contract. In turn, we expect this to drive further commercial investment to address previously unidentified gaps - ensuring that people and businesses get the connectivity they need, whether to start and grow a business or to have a remote healthcare appointment.

2. Setting a bold 2030 ambition

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.

We are therefore setting a new headline ambition for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030 (emphasis added).

3. Strengthening the investment climate

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While the government already has a range of policies in place to drive forward the deployment of digital infrastructure, our 2030 ambition requires significant commercial investment.

This includes:

- Continuing to remove practical barriers to the deployment of 5G infrastructure.

4. Realising the full benefits of 5G

We want people, business and public services across the UK to realise the full benefits of 5G and advanced wireless connectivity. However, without concerted action, this will be slow to materialise and limited to larger businesses, in fewer sectors, and in certain geographies.

Supporting places to attract investment: we set out how we will drive greater opportunities for industry and public service providers to be empowered customers for future connectivity solutions – supporting places to attract investment and encouraging adoption of 5G services.

We will do this by:

- Driving local leadership and coordination and encouraging local authorities across the UK to employ digital champions to provide strategic leadership for local authorities' own digital infrastructure strategies.

There are 5 chapters which outline the aims and ambitions, along with the steps the government are going to take in order to achieve their set targets and provide improved 5G connectivity for all.

Chapter 1 - Approach and scope

This strategy sets out a policy framework to help deliver the government's priority of growing the economy and to ensure the UK benefits from advances in wireless connectivity for the next decade.

Chapter 2 – Ensuring good connectivity across rural and urban areas.

The government's priority to build a better, more secure, more prosperous future for the UK includes a clear commitment to grow the economy and create better-paid jobs and opportunity right across the country. To do this, it is vital that people who live and work in all parts of the UK, including in rural areas, have access to good quality mobile and broadband coverage.

Chapter 3: Our 2030 ambition

World-class digital infrastructure underpins the digital economy – it was worth £143 billion in 2021, accounting for 5% of the national workforce. This infrastructure provides the backbone

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of the UK economy and society with ever more jobs, public services and societal interactions built upon its foundations. As growth in the digital sector is nearly six times faster than across the economy as a whole, its importance will only continue to increase as we deliver the Prime Minister's priority of growing the economy.

4G technology revolutionised the way people use their mobile phones. What today is considered normal, a decade ago was ground-breaking. We have seen the growth of streaming services, like Netflix and Spotify, and gained constant access to high quality, user-produced content for free on platforms like YouTube, transformed the way we shop online, travel around cities through access to apps like Uber and Bolt and use public services, such as booking NHS appointments through apps.

The evolution of 5G

While 4G will continue to play an important role in providing widespread geographic connectivity to consumers through public cellular networks across the UK's landmass, 5G can offer significantly better performance and support a far greater range of use cases. 5G enables data transfer speeds of more than 10 times faster than 4G, has the potential to offer lower latency and greater reliability and the ability to connect more devices. The implications of these improvements reach far beyond the potential to develop the capabilities of smartphones, enabling an array of innovative use cases and providing for transformative economic, and social benefits that were perhaps unimaginable a decade ago.

The government's ambition for the majority of the population to have access to a 5G signal by 2027 has been met early through the deployment of basic, or non-stand alone, 5G which is built on a 4G core network. While this has helped MNOs increase the capacity of their networks in more densely populated areas, it does not reflect the full functionality 5G can deliver.

Without clear action, the market for advanced 5G services will remain nascent as many business and public services do not yet fully understand the benefits or how to navigate the supplier ecosystem for 5G enabled digital products, applications and services.

We want high quality coverage to extend well beyond cities and larger towns to all populated areas of the UK, including villages and rural communities. ***We are therefore setting a stretching new ambition of nationwide coverage of standalone 5G to all populated areas of the UK by 2030*** *(emphasis added)*.

Chapter 4: Strengthening the investment environment.

Our 2030 ambition requires commercial investment, and this chapter focuses on creating the environment to support it.

The deployment of standalone 5G and ultimately advanced will require operators to deploy additional infrastructure, including:

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- 5G core networks in addition to the 5G equipment in the radio access network
- upgrades to the existing grid of approximately 18,000 macro cell sites per MNO
- additional cell sites to provide 'infill' to cover gaps in coverage

Addressing barriers to deployment

Since the publication of the Future Telecoms Infrastructure Review, the government have taken significant strides to make it quicker and easier for operators to roll out new digital infrastructure including making reforms to the planning system to support the deployment of 5G and extend mobile coverage in England.

Chapter 5 – Realising the full benefits of 5G and advanced wireless connectivity.

5G and other forms of advanced wireless connectivity pave the way for new services and applications that can have a transformative effect on our public services, businesses and our local economies, delivering this government's priority of growing the economy and creating better paid jobs. Wireless connectivity can support mobile healthcare workers and connected vehicles, improve traffic flow through our cities and enable our factories to be more productive, supporting the fourth industrial revolution. Our evidence is clear that the most significant economic benefits from 5G will come from widespread adoption of advanced 5G by industrial sectors, including manufacturing and logistics, and by public services.

The government is determined that the UK should take full advantage of these opportunities, but this will only be possible if places across the country can attract commercial investment in 5G and other forms of advanced wireless connectivity and for that to be adopted at scale by businesses and public services.

Connected places.

Improving digital connectivity is one of the government's Levelling Up Missions. We want places and communities across the UK to share in the benefits of good connectivity, enriching lives and driving local growth.

We want to support connected places with their digital connectivity ambitions. **We will do this by helping regions and local authorities to build the case for adopting new technology, attracting investment and removing practical barriers to the deployment of advanced wireless networks** (*emphasis added*). Local and regional authorities play a pivotal role in facilitating the rollout of wireless connectivity and their role will become more critical than ever as investment in 5G continues, due to its technological complexity and the vast number of new applications and services it can support.

Local leadership and coordination

Local leadership can help to identify and break down barriers to deployment at a local level by bringing together stakeholders across the public sector and building strong relationships

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with industry. The installation of telecoms infrastructure involves a number of different local government departments (such as ***planning***, estates, ***highways***) and their activities can be siloed and uncoordinated.

It is essential that, at a leadership level, local and regional authorities recognise the importance of wireless connectivity and identify decision-makers within the organisation who are empowered to facilitate private sector investment.

Chapter 6: Driving adoption in key economic sectors.

Adoption of 5G-enabled use cases in sectors such as healthcare, transport & logistics, manufacturing and agriculture will drive economic growth and productivity across the UK, delivering our priority of economic growth.

Key features of 5G for industry Dedicated 5G networks can enable:

- data analytics: Utilising operational and environmental sensor data to make real time decisions about equipment and operational performance.
- video surveillance and geolocation: Providing the location of workers and assets for security and safety purposes.
- tracking moving assets: Working with self-driving vehicle technology and software guidance systems to provide situational awareness of mobile assets.
- automation: Enabling independently operating robots to perform operational tasks.

Online Nation 2024 Report (November 2024)

The Online Nation report (November 2024) sets out an overview of the UK online landscape in 2024, exploring both children's and adults' use of and experiences on online services. For most people in the UK, being online is a major part of daily life. Being online allows people to connect with others, sometimes in ways they may not be able to do offline. Data shows how we benefit from a range of online services, from messaging and calling platforms to gaming platforms, online news outlets and online shopping.

The 2024 report found that the majority of the time spent online per day in May 2024 by adults was on smartphones, in all age groups.

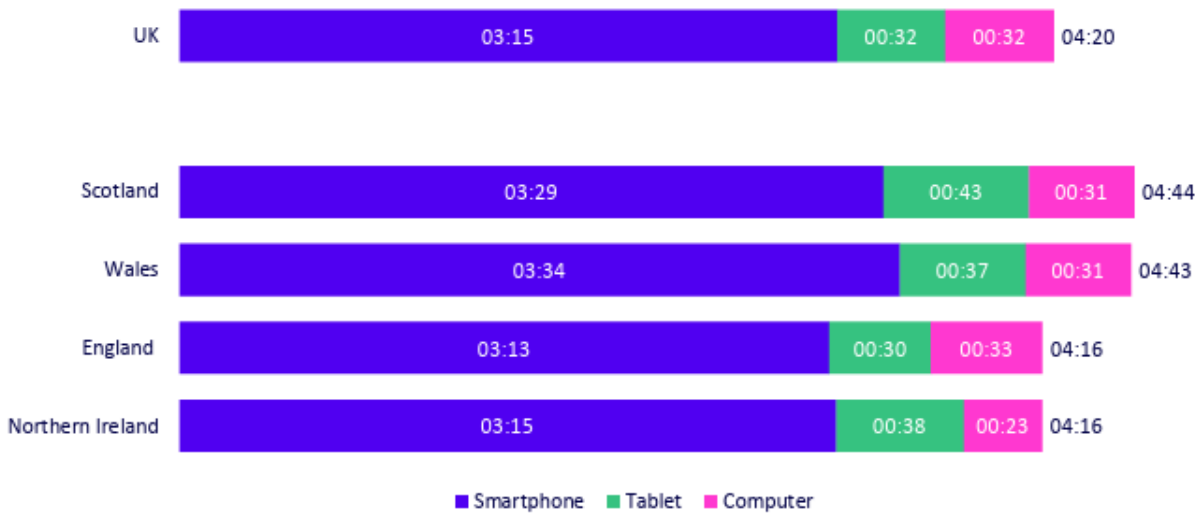
The 2023 report found that three quarters of the time spent online per day in May 2023 by adults was on smartphones.

Source: Average daily time spent online by device - Ipsos, Ipsos iris Online Audience Measurement Service, May 2024, age: 18+, UK internet users. Note: custom data supplied by Ipsos. Time spent online includes personal use and in some instances those who also use their device for work. UK home internet access - Ofcom Technology Tracker 2024. QE1: do you or does anyone in your household have access to the internet at home (via any device, e.g. PC, mobile phone etc.), and if so, do you personally use the internet at home? Base: all respondents aged 16+, UK.

UK adults spent an average of 4 hours 20 minutes a day online in May 2024. Young adults spent the most time online, with 18-24-years-old spending a daily average of 6 hours 1 minute online, and those aged 65+ spending the least time online (3 hours 10 minutes).

In May 2024, 75% (3 hours 15 minutes) of the time spent online per day by UK adults, across smartphones, tablets and computers, was on a smartphone. The average time spent online on computers and tablets was identical at 32 minutes daily, with older people (65+) tending to spend more of their time online on tablets, and young people spending relatively more of their time on computers. The 25-34-year-olds spent the greatest proportion of their time online on smartphones, at 83% while those aged 65+ spent the least time via smartphone, at 56%.

Figure 3: Daily time spent online by adults, by device and UK nation (hours:minutes): May 2024



Source: Ipsos, Ipsos iris Online Audience Measurement Service, May 2024, age: 18+, UK internet users. Note: Custom data supplied by Ipsos.

In keeping with previous years, Alphabet, which owns Google and YouTube, remained the organisation whose sites and apps are most visited by UK adults, reaching almost all UK online adults (99%) in May 2024, maintaining the levels seen in 2023 (99%). Meta, the owner of Facebook, Instagram and WhatsApp, followed close behind, with its sites and apps visited by 96% of UK online adults (May 2023: 97%). The sites and apps of Amazon, Microsoft and BBC were the third, fourth and fifth most visited, visited by 90%, 87% and 83% of UK online adults respectively. The top five most-visited organisations were the same for all UK nations.

UK online adult smartphone users used on average 38 apps on their smartphones in May 2024, up from 36 in May 2023. All adult age groups saw an increase in the average number of apps used on smartphones between May 2023 and May 2024 except 18-24-year-olds, who used one fewer app than the previous year, and 18-24-year-olds used the fewest apps of any age group except those aged 55+ - perhaps surprisingly, since the 18-24 age group spent the most time using smartphones.

Ofcom research found that 41% of UK internet users aged 16+ said they had used a generative AI tool in the past year, with 18% of those aged 16+ saying they had used a generative AI tool in the past month. Internet users aged 16-24 were the most likely to say they had used a generative AI tool in the past year (78%) compared to all other age groups.

Ofcom's survey found that 33% of UK online aged 16+ said that they had used ChatGPT in the past year, with a long tail of other generative AI tools reaching 15% or less. Ipsos iris data found that 9% (4.2m) UK online adults aged 18+ visited ChatGPT in May 2024, increasing to 11% (5.0m) in August 2024. ChatGPT's adult reach was highest among UK online 18-24-year-olds (27%, 1.4m) in May 2024. However, while reach to those aged 25+ remained relatively stable in the following two months, reach to 18-24-year-olds declined by 16% (-226k). This may

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be partly because this time period marked the end of the academic year, with this age group potentially having less need to find information or content relating to their education. The notable increase in reach, particularly to 25-34 year olds, in August 2024 compared to previous months, may partially be attributed to the publicity generated by OpenAI's announcement on 25 July of its SearchGPT Prototype – a search designed to combine OpenAI's models with information from the web.

Meta-owned WhatsApp (web or app) continued as the highest-reaching messaging service, reaching 87% of UK online adults in May 2024. Sixty-four per cent of UK online adults accessed WhatsApp per day in May 2024, an increase of 6pp compared to May 2023 (58%). Ofcom's survey similarly found that 86% of UK internet users aged 16+ had used WhatsApp in June 2024, followed by Facebook, Messenger with 59% and Instagram direct messages with 30%.

Sixty-nine per cent (32.5m) of UK online adults visited one of the top then health and wellbeing websites or apps in May 2024, up from 66% for the same sites the previous year. The nhs.uk website was the highest-reaching NHS-owned site or app, reaching 47% (22.5m) of UK online adults, followed by the NHS app, visited by 21% (10.0m) of UK online adults in May 2024. Fifty-eight per cent (23.0m) of adults in England visited NHS-owned sites or apps in May 2024, 53% (1.1m) in Wales, 39% (1.5m) and 35% (437k) in Northern Ireland.

On average, 16.4 million (35%) UK online adults visited Amazon per day in May 2024.

Ofcom's OET found that, when asked to consider the impact of being online, the majority (67%) of adult internet users agreed that for them personally, the benefits of being online outweighed the risk, with just 7% disagreeing. Although, the majority recognised the benefits, the proportion doing so had decreased since the previous two waves of the tracker, from 71% in June 2023 and 68% in January 2024.

Connected Nations 2024 (December 2024)

The current Connected Nations report provides update data on the coverage and usage of fixed broadband and mobile networks within the UK. This includes updates on take-up of services on full-fibre and gigabit-capable networks, reporting on the further development of 4G networks and progress on the rollout of 5G networks.

The report recognises that mobile connectivity has become an integral part of modern living; it enables effective communication, provides access to information and services, enhances productivity, and supports various aspects of daily life.

5G availability continues to grow steadily. 5G continues to reach a growing number of consumers, with around 50% of mobile handsets now 5G capable and notable increases in coverage observed across the UK. The availability of 5G, where consumers are likely to a 5G network, continues to grow, although it varies by MNO and geography. In 2024, there has been an increase in 5G coverage across the UK, with 95% (High Confidence) and 90% (Very High confidence) 5G coverage in areas outside of premisses where it is available from at least one MNO. This is an improvement from 93% and 85% respectively in 2023.

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	5G outside premises (MNO range)	4G outside premises (MNO range)	4G geographic (MNO range)	4G total not spots	Voice and text total not spots
UK	61-79%	99-99+%	88-89%	5%	3%
Scotland	54-76%	99-99+%	77-80%	11%	7%
Northern Ireland	36-90%	98-99%	89-95%	2%	<1%
Wales	16-80%	98-99%	83-89%	5%	3%
England	65-81%	99-99+%	94-96%	1%	1%

Source: Ofcom analysis of MNO predictions (September 2024)

The footprint where all MNOs provide 5G coverage remains considerably lower. However, it has increased, now covering outside 38% of premises at the High Confidence level and 19% at the Very High Confidence level, up from 25% and 16% respectively last year.

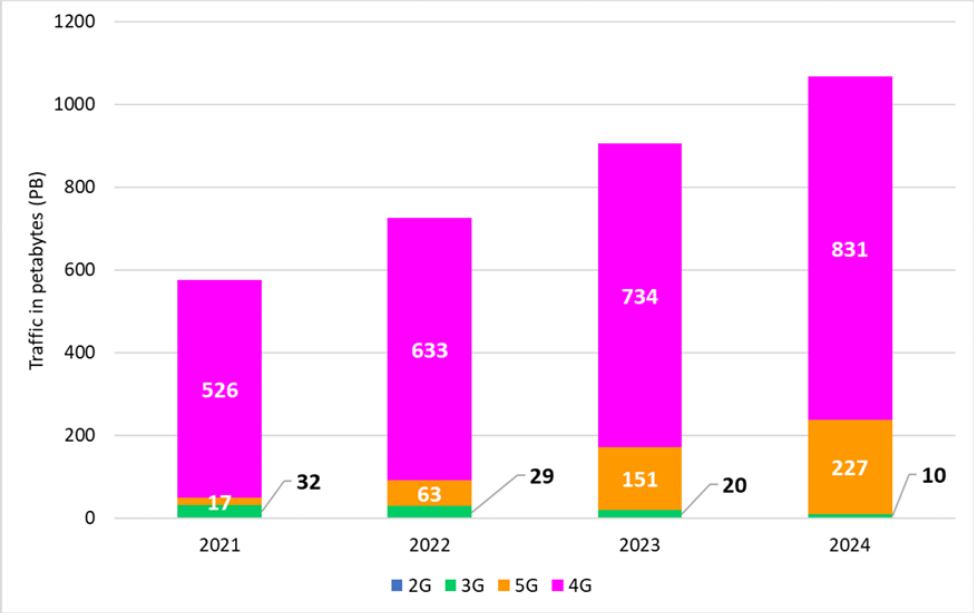
The report also notes that while 5G coverage is expanding, the most people still use voice and data services over 4G. Overall, 4G geographic coverage across individual MNOs in the UK has increased significantly since 2023, rising from a range of 80-87% to 88-89% this year. 4G geographic coverage where it is available from at least one MNO has now reached 95% compared to 93% in 2023. As the majority of the UK landmass is rural, rural coverage levels are similar to overall UK levels, while urban areas report moderately higher geographic coverage.

The report notes that 4G coverage is predicted to be available inside vehicles on motorways and A roads across individual MNOs in a range of 89-92%. This falls to a range of 80-83% for B roads. Outside vehicles, 4G coverage on motorways and A roads ranges between 98-99% across individual MNOs, compared to 94-98% in 2023, and between 95-96% for B roads, compared to 90-95% in 2023.

The Connected Nations 2024 report states that 3G and 2G switch-off is underway. All MNOs made a commitment to the Government to switch off their 2G and 3G networks by 2033 at the latest. This will result in improved network efficiency and enable more spectrum to be used for 4G and 5G services.

5G traffic has shown the highest growth from 151 PB in 2024 to 227 PB in 2024, an increase of around 50%. This data traffic was generated from a device pool which now includes at least 50% 5G capable handsets (up from around 43% in 2023) and represents around 21% of the total monthly mobile traffic, up from around 17% in 2023. 14% of this traffic is 5G standalone, which is around 3% of overall monthly mobile traffic in the UK. While 5G traffic has increased

rapidly, 4G continues to carry most of the mobile data traffic, accounting for around 78% of total monthly data traffic (a decrease from 81% reported in 2023).



Source: Ofcom analysis of operator data (May 2021, May 2022, May 2023, July 2024)

Planning Assessment

The following paragraphs set out how the application complies with the NPPF, The Code of Practice and the Camden Local Plan, the Camden Planning Guidance – Digital Infrastructure, and the London Plan. The requirement for new capacity and coverage is urgently required to provide additional capacity into this economically vital area. A new site at this location is needed to provide partial coverage replacement for a former base station site located atop of Castlewood House at the junction of New Oxford Street and Earnshaw Street. It was a well-established shared mobile telecommunications serving the New Oxford Street, St Giles High Street and Tottenham Court Road Underground station area. The reason behind the replacement is that the Landlord, due to redevelopment of Castlewood House, served a 'Notice to Quit' (NTQ), legally requiring the applicant to remove their equipment. The Landlord's proposal to redevelop the site for an 11-storey mixed used development was approved under LPA ref: 2017/0618/P. Without the replacement site the coverage in this cell area will be lost by the operator leading to a gap in their network.

A previous planning permission (2021/3402/P) was refused on the 1st of March 2022. The reason given was that the 'proposed equipment, by reason of its design, siting, height, size, and prominence, would be detrimental to the appearance of the host building and character and appearance of the Bloomsbury Conservation Area. There have therefore been major changes between this proposal and the previously rejected one, which is demonstrated in the figures below.

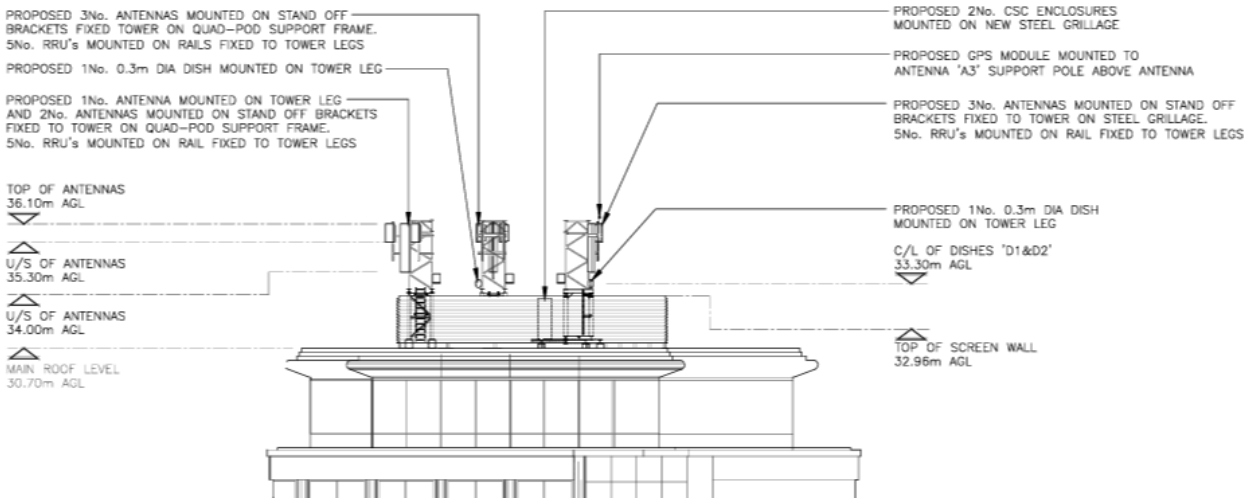


Figure 14 – The bulkier previous design.

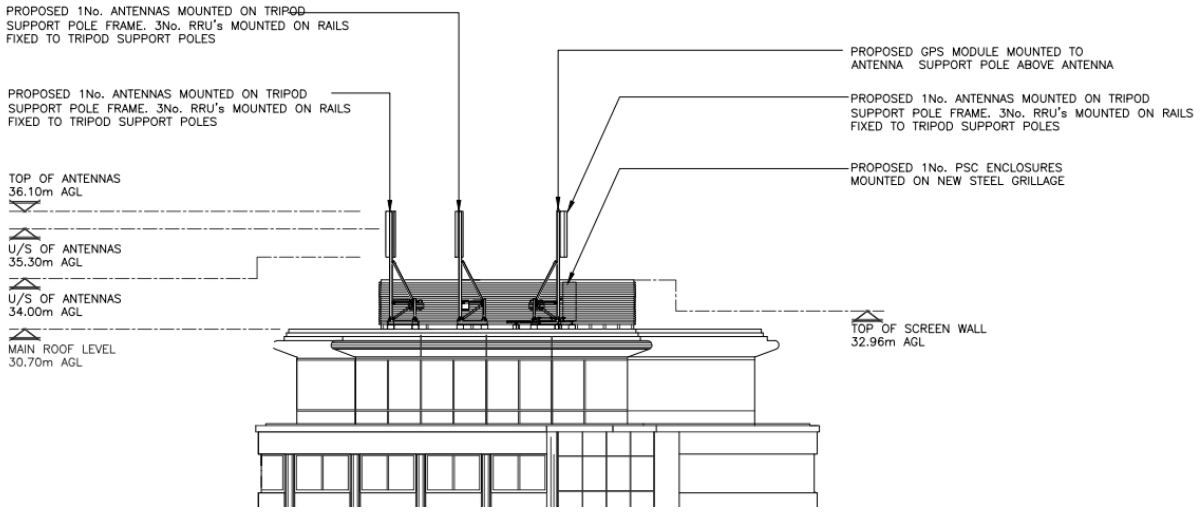


Figure 15 – The slimline updated design.

This proposal therefore represents a significant slimming of the support structures, from a stub tower to a pole design. The applicant therefore urges the LPA to work with them to provide this new infrastructure to ensure London's ongoing competitiveness whilst also not harming the conservation area. The less than substantial harm can be seen from a streetview/eyeline point of view in the following visuals. The site is visual, however only singular antennas can be seen, when combined with the often grey sky and the person having to arc their neck up to the site to even see the antenna, this reduces the harm to the conservation area to be as minimal as possible.

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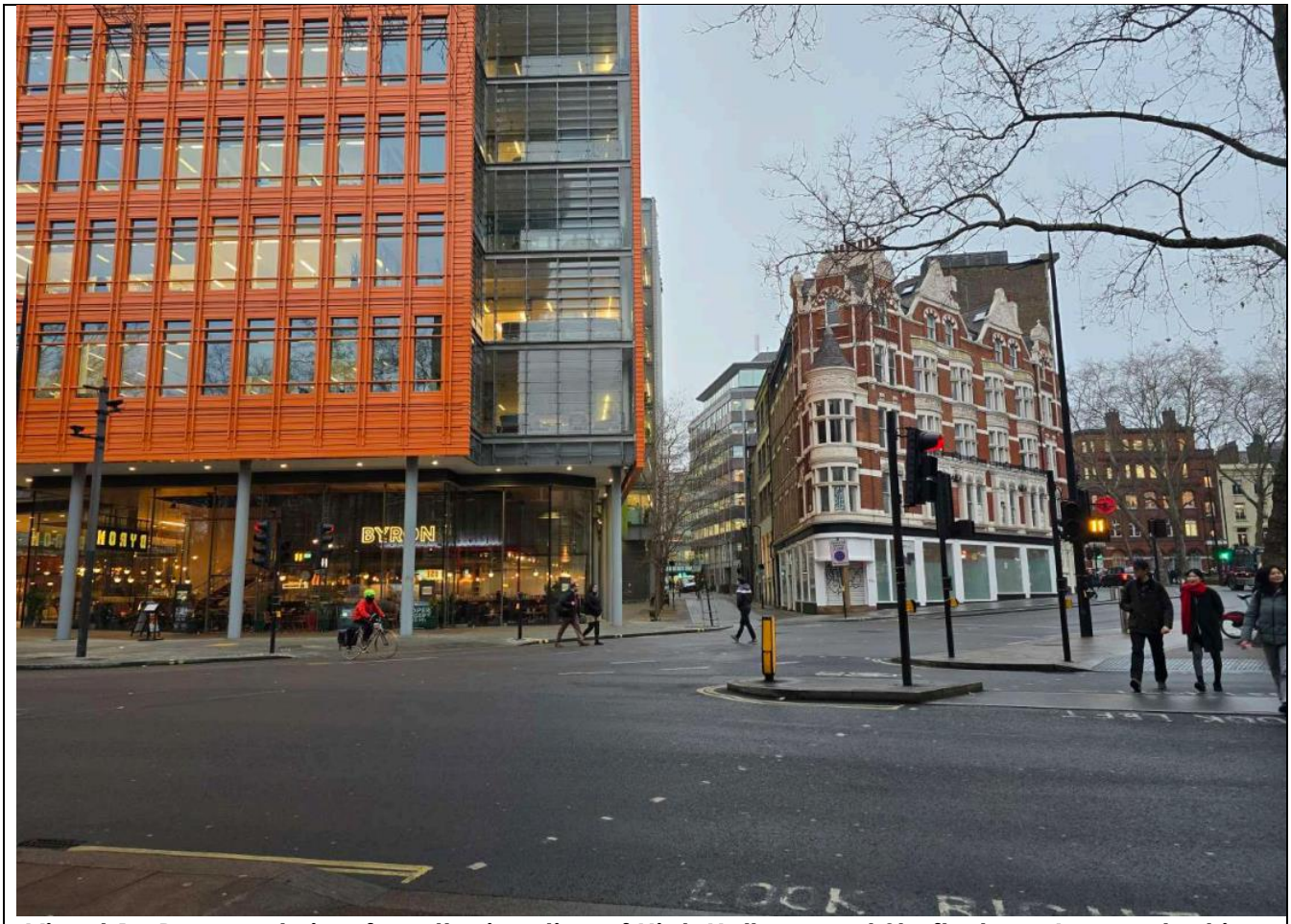

Visual 1 - Proposed view from the junction of High Holborn and Shaftesbury Avenue looking North.

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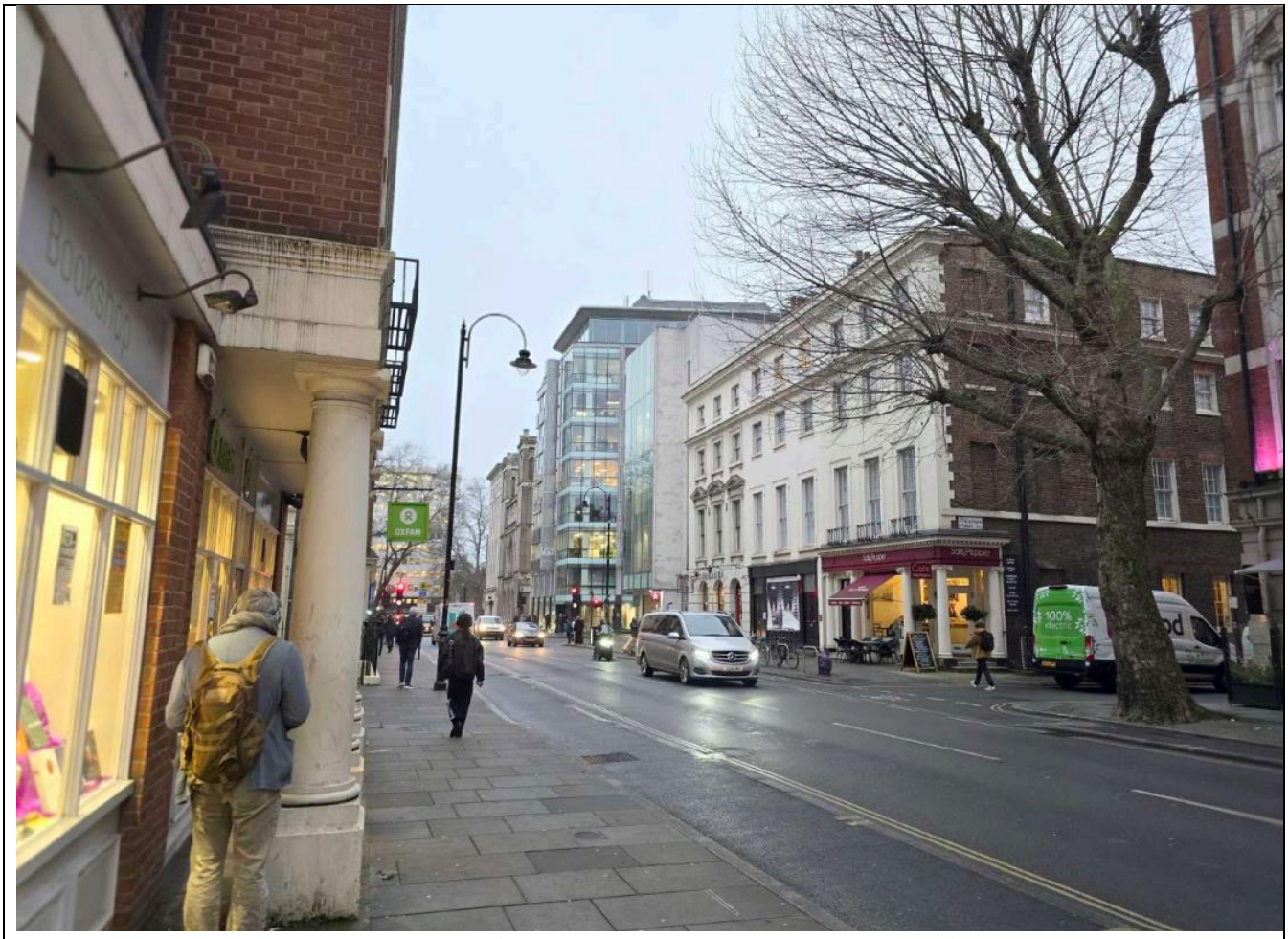

Visual 2 - Proposed view along Bloomsbury Street looking South

The proposed equipment fully complies with the objectives of the NPPF. Government guidance states that in order to peculiarities which characterize telecommunications infrastructure. Therefore, the proposals fully accord with the Camden Local Plan, the Camden Planning Guidance – Digital Infrastructure, and the London Plan as it will improve coverage and capacity and new 5G provision services to this area of New Oxford Street, limit visual intrusion the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need of a new site has been justified.

This radio base station will enable Cornerstone on behalf of Vodafone to provide new services in the New Oxford Street area, in line with the NPPF. The operator's license obligations require them to meet customers "reasonable demand". Reasonable demand would be to provide indoor coverage as customers expect to be able to use their handsets indoors. The operator also have a competitive market driven "requirement" to provide a high-quality service.

The main matter for consideration is whether the proposed siting, size and design of the telecommunications equipment would be out of keeping with the character and appearance of the surrounding area, resulting in harm to the Conservation Area. Would this

harm outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal and other valid material considerations as outlined within NPPF.

As established in Policy SI 6 of the London Pan and the Camden Local Plan, the Camden Planning Guidance – Digital Infrastructure, connectivity to communications networks is now a vital component in social and economic life.

Siting and Appearance

The height and position of the antennas on the building are so that they can be justified from a technical perspective as the antennas need to clear the immediate roof so as not to create signal clipping and reflection. The height of the proposed antennas located on the rooftop of Albion House has to be offset against its position on the roof, whereby the closer to the centre of the roof of the building the more height that is needed to clear the immediate roof space in front of the antenna. The antennas enable the operator to provide the multiple technologies and meet their full coverage and capacity requirements to the target area within the permitted ICNIRP guidelines. As such, these slimmer proposals have been designed and sited to minimise the visual impact on the character and appearance of the host building and conservation area.

The Camden Planning Guidance – Digital Infrastructure advises that new development should explore opportunities for co-location and for sharing facilities and that they should be located on the existing buildings. The proposal accords with the Camden Planning Guidance – Digital Infrastructure, and the Camden Local Plan in that the proposed antennas are located on the rooftop of existing building which will limit the impact on heritage assets and the street scene. The proposal is therefore in accordance with the Camden Local Plan, the Camden Planning Guidance – Digital Infrastructure, and the London Plan.

Telecommunications antennas are essential infrastructure to enable the mobile network to function. Similarly, plant rooms and air conditioning units are essential infrastructure but will not necessarily create places that are locally distinctive, people friendly, provide natural surveillance, nor improve the built character and quality of an area and the way it functions. Indeed, few if any essential rooftop infrastructure in the vicinity of the site enhances the character, quality or function of the area.

The installation of a telecommunications base station comprising the installation of 3 no. antennas mounted on 3 no. 5.4m tripod support poles, 1 no. PSC enclosure and ancillary development thereto including Remote Radio Units (RRUs) is designed to be as similar as possible to other roof top infrastructure found in the immediate area including the plant rooms located on the rooftop, will be no more at odds with the street scene and character of the area than other existing equipment located on rooftops such as plant rooms and air conditioning units.

It is accepted that the height of the proposed installation is taller than the host building. This in itself is not a valid reason to conclude that it is not appropriate at a specific location.

Telecommunications apparatus by its very nature must be taller than surrounding built and natural form to ensure its efficient operation. To suggest that it is inappropriate because it is potentially visible, (if you crane your neck in an unnatural stance), is no more relevant than suggesting that plant rooms are inappropriate because they are taller and bulkier than existing rooftops. It would be very unusual for anyone to be craning their necks upwards to the top of this building.

Although the roof level of the main roof is 30.70m and the top height of the antennas is 36.10m the antennas will not appear prominent in public vantage points. There is a screen wall around the base of the tripod frames which will screen the majority of the equipment. As explained above, the antennas can't be screened as their signal will be blocked from reaching the target coverage area.

Paragraph 3.8 of the delegated report for the previous refusal (LPA ref: 2020/1649/P) states there public benefits would not outweigh the harm to the conservation area:

> *"Due to the visual prominence of the installations proposed above the existing screen, and inappropriateness due to the design, siting, and height of the unsympathetic telecommunications equipment, the proposal would neither preserve nor enhance the Bloomsbury Conservation Area, or the adjacent Seven Dials (Covent Garden) Conservation Area. Furthermore, the proposed installation is considered to have a negative impact on the setting of nearby listed buildings".*

The submitted photomontages demonstrate the antennas will be barely visible from the two Conservation Areas and listed buildings. Viewpoint 1 was taken from inside Bloomsbury Conservation Area, it does show the two sectors of the antennas will be visible, however ***only the antennas themselves will be visible (emphasis added).*** The supporting frames will be screened by the existing supporting wall. The often grey sky will also help the antennas blend in with the skyline.

A similar case will be experienced with viewpoint 2 along New Oxford Street looking south west towards the site. Again, ***only the antennas themselves will be visible (emphasis added).***

Viewpoint 4 was taken from the Shaftesbury Theatre, a Grade II listed building, the image also shows the two other Grade II listed buildings including the Bloomsbury Church. The viewpoint shows the antennas will not be visible at all when looking at the Grade listed buildings, therefore will not impact the setting on the buildings. This is in line with NPPF, and Camden Local Plan D2.

Reasonable consideration of the proposal in the context of adjacent rooftops can only conclude that the presence of other rooftop equipment in the immediate area only seeks to provide a setting wherein a base station may appear more congruous from which to provide an important service to a wider area.

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Viewpoint 5 and 6 were taken from the adjacent Seven Dials (Covent Garden) Conservation Area. Viewpoint 5 shows there will be one sector visible from this angle, ***but again only the antenna will be visible (emphasis added).*** The delegated report stated previously stated:

> *"The roofline here is clean and uncluttered and the equipment would be in sharp relief clearly visible above the roofline".*

The re-design of the equipment shows the roofline will remain uncluttered with only 1 small antenna being visible. The surrounding differentiating pitched style roofs with no other flat roofs which would provide a clear and visible above the differing roofline heights.

The proposal represents the best visual and environmental solution to resolve the operational requirements of the operator as part the NTQ project. The antennas and tripod frames are the slimmest and least amount they are able to utilise to replicate the coverage required in such a busy urban area of London. The impact has been greatly reduced and any potential adverse impacts of granting planning permission on the character and appearance of the host building, conservation area and surrounding area would not outweigh the benefits, when assessed against the policies in the NPPF.

The proposal fully complies with national guidance set out in NPPF. Enhancing Vodafone's 2G, 4G and 5G communications network is essential for sustainable economic growth, as acknowledged by the NPPF. Mobile communications network development also plays a vital role in supporting London's successful service-based industries which increasingly depend upon infrastructure facilitating rapid transfer of information and which contributes to wider planning objectives such as reducing congestion.

Lack of Coverage – Material Consideration

In accordance with the NPPF, the proposed installation is significant to enable continuous coverage of the telecommunication network, ensuring that this area of New Oxford Street and London continues to get the mobile coverage it needs for VMO2 customers. It will also maintain and improve coverage for the Mobile Virtual Network Operator's (MVNOs) which use the VMO2 network which includes Giffgaff, Sky Mobile and Tesco Mobile. So, the proposal will not only provide a service for the operator but those who buy network space off them, which is at least 3 with VMO2. This will provide a choice for those customers who consider the level of coverage in their area when selecting which operator, they agree future contracts with.

The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place. In the justification to Policy SI 6 of the London Plan the Camden Local Plan, the Camden Planning Guidance – Digital Infrastructure it acknowledges that maximising access and maintaining choice in both telecommunications should enable people to maintain and enhance economic, social and civic connections. Universal accessibility to telecommunications is vital to help overcome isolation or exclusion of urban life. Accelerating the extension of new

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communications modes should help to avoid new pockets of exclusion developing. The proposed radio base station enhancing existing service provision and providing new 5G technology will support this policy justification.

By providing the latest 4G technology and new 5G service provision the proposals will also help meet the aspiration of the London Plan, the Camden Local Plan, and the Camden Planning Guidance – Digital Infrastructure, with all businesses, residents and public services all having access to a world class digital infrastructure.

Improved 5G coverage in this part of London will also fully comply with the London Plan, the Camden Local Plan, and the Camden Planning Guidance – Digital Infrastructure by helping to meet the challenge to provide pervasive, affordable, resilient digital connectivity. The London Plan notes that if this challenge is to be met then early roll out of 5G especially in areas where mobile data use is congested is needed. The proposed installation will fully meet this policy aspiration. The proposals will also help London to be a smart and digitally ready city-region, where resilient fixed connectivity supported by 5G service provision is required. The proposed installation will fully comply with this aim.

Trials have already begun across the UK to demonstrate the potential of 5G and how it can improve and drive productivity and efficiency. In June 2019, West Midlands 5G partnered with BT and University Hospitals Birmingham to trial the UK's first 5G Connected Ambulance. Real-Time communications between the paramedics and the hospital doctors enabled the effective diagnosis of the patient at an early stage of care. The trial showed how a paramedic performed a remote-controlled ultra-sound scan on a patient in an ambulance over a public 5G network. These trials show how digital connectivity, and technology can reduce patient waiting times and save lives (Source: WM5G).

Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work.

Without this new radio base station, the operator's customers would experience increasing numbers of dropped calls and buffering unable to access the internet on their handheld devices. They would also not be able to access the 5G network, a demand which is increasing rapidly as customers update their handheld devices to ones that are 5G compatible, and one that London is embracing with its ambition to be a world leading digital city and 'smart' city where early roll out 5G is encouraged to provide pervasive, affordable, resilient digital connectivity. If the 5G network is not available, then the customers' would not be able to utilise these handheld devices for the purposes in which they were purchased. This would be contrary to both the aspirations of Central Government and the Mayor of London aspirations which aspire to everyone having access to the superfast highway network wherever they are and being a world leader in 5G.

The proposed installation will help improve the area's economic prosperity, strengthen the urban economy's by supporting local businesses to start, grow, adapt and diversify. It will support a better environment for today and tomorrow by reducing the need to travel and in

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turn minimise carbon emissions, a key ambition of the NPPF, London Plan, the Camden Local Plan, and the Camden Planning Guidance – Digital Infrastructure. The radio base station will support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders (every missed NHS appointment costs the NHS approximately £160 source: NHS), reminders to take medicines, make appointments etc. As well as assisting hospital outpatient appointments and emergency consultations carried out remotely via video link, connected ambulances, live streaming of CCTV footage etc.

The Councillor's Guide to Digital Connectivity notes that a survey conducted by the Confederation of British Industry found that 81% of firms said that they see more reliable mobile connectivity as essential. Studies have also shown that mobile broadband is associated with positive impacts nationally, such as higher GDP and increased employment.

The Government fully supports high quality communications infrastructure, even more so with the advent of 5G. The NPPF continues to strongly support telecommunications connectivity and states at paragraph 118 that local planning authorities should support the expansion of electronic communications networks. It acknowledges that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.

The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

To emphasis the Government's strong support for 5G and the important role that local authorities have in supporting its roll-out, Matt Warman former Minister for Digital Infrastructure wrote a letter to all Local Authority Chief Executives, CCing all Local Authority Chief Planning Officers highlighting their role in facilitating the roll-out of next-generation infrastructure and prevent misleading claims becoming a barrier to rollout. The letter highlighted the growing importance of digital connectivity:

> *'Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data is increasing rapidly, and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high-quality connectivity'.*

The letter goes on to state the Government ambition for 5G roll-out:

'The Government is committed to extending mobile network coverage across the UK and providing uninterrupted mobile signal on all major roads, and our ambition is for the majority of the population to have access to a 5G signal by 2027'…

The Government is also investing £200 million in a programme of 5G testbeds and trials to encourage investment in 5G so that communities and businesses can benefit from this new technology. The increased capacity, reliability and functionality offered by 5G is opening-up

the potential for new innovative services for individuals and increased productivity for industry'.

The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliable on mobile connectivity. Following our consultation on the principle of reforms to permitted development rights to support 5G deployment and extend mobile coverage we recently published a technical consultation on the details of our proposed changes.

The National Planning Policy Framework ("The Framework") for England states that planning policies and decisions should support the expansion of electronic communications networks, including next general mobile technology, such as 5G.

An installation in this location will ensure the replacement coverage and improved capacity service provision and will enable VMO2, as well as MVNOs who buy network space off these operator to maintain access to their handheld devices wherever they are for the purposes in which they were purchased. This is fully in line with the Government's aspirations that everyone has access to the superfast communications network, the NPPF, London Plan, the Camden Local Plan, and the Camden Planning Guidance – Digital Infrastructure.

An installation in this location will ensure the lack of new 5G high quality service provision is filled and will enable VMO2 and MVNOs who buy network space off this operator to maintain access to their handheld devices wherever they are for the purposes in which they were purchased. This is fully in line with the Government's aspirations that everyone has access to the superfast communications network, the NPPF, the London Plan, the Camden Local Plan, and the Camden Planning Guidance – Digital Infrastructure.

In line with guidance contained within the NPPF, the London Plan, the Camden Local Plan, and the Camden Planning Guidance – Digital Infrastructure a new radio base station in this location will enable fast, reliable, secure internet accessibility wherever the user is located. It would fully meet the latest operator's coverage and capacity requirements for 4G and new 5G provision. This would be wholly in line with the Government's latest aspirations to strongly support advanced, high quality and reliable communications infrastructure, essential for economic growth and social well-being. Where the NPPF notes that decisions should support the expansion of electronic communications networks. An installation outside this search area, regardless of whether there are existing sites, would not allow the operator to provide their desired level of coverage and therefore would not adequately maintain and provide new coverage and capacity.

As part of the operator's 5G licence obligations, many customers will benefit significantly from a vastly improved service provision in this locality. They will be able to gain access to the very latest technologies and connectivity, including 5G, to high-speed data services. The importance of which is fully highlighted in the London Plan, the Camden Local Plan, and the Camden Planning Guidance – Digital Infrastructure.

The Code of Practice acknowledges that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which we rely. With increasing consumer demand and the Government's aspirations for high-quality communications infrastructure it is ever more important to improve connectivity and capacity.

The Code of Practice acknowledges that there will be times when there is a need for a new radio base station, where sites have been lost, where areas have limited or no coverage and where coverage and capacity need to be enhanced. This application is one such example where there is a need to enhance 4G and 5G provision services within this area. A new site at this location is needed to provide partial coverage replacement for a former base station site located atop of Castlewood House at the junction of New Oxford Street and Earnshaw Street. It was a well-established shared mobile telecommunications serving the New Oxford Street, St Giles High Street and Tottenham Court Road Underground station area. The reason behind the replacement is that the Landlord, due to redevelopment of Castlewood House, served a 'Notice to Quit' (NTQ), legally requiring the applicant to remove their equipment. The Landlord's proposal to redevelop the site for an 11-storey mixed used development was approved under LPA ref: 2017/0618/P. Without the replacement site the coverage in this cell area will be lost by the operator leading to a gap in their network. Without the replacement site the coverage in this cell area will be lost by one of the major operator leading to a gap in their network.

In the Code of Practice, it acknowledges '*the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. With the increasing consumer demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity. This is due to the ever-increasing demand for data hungry applications to be available to a range of connected devices, such as smartphones and tablet computers. However, The Code notes that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which they rely*'. Therefore, there is a significant need to locate the equipment in this area.

The operator not only has a license requirement to provide a certain level of 2G, 4G coverage to the population, the operator is obliged to meet the growing consumer demand for 5G coverage, especially as more people are purchasing 5G enabled devices, in line with their license obligations and the operator's competitive market driven "requirement" to provide a high-quality service. Customers expect to be able to access their portable handheld devices wherever they are, whether that be indoors or outside. There is currently limited 5G service provision that is provided by VMO2 in this cell area. The least impact on the surrounding environment in order to fill this gap is by installing a new radio base station at the application site.

It is therefore imperative that the operator continues to invest in ensuring that the latest technologies are available on its network, so that customers are able to continue to use their handheld devices wherever they are, for whatever reason, for the purposes in which they were purchased.

Economic and Social Benefits

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The Town and Country Planning Act requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. Paragraph 208 of the Framework states that where a development would 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. With reference to the levels of harm in the NPPF, the proposals would result in 'less than substantial' to the significance of any of the identified heritage assets through a change in their settings.

When telecommunications proposals are considered, it is necessary to carry out the balancing exercise weighing the need for development and the magnitude of public benefits of the proposed base station against the perceived concerns about the development's visual impact and availability of alternative locations and the possibility to design the scheme differently without impacting the operational needs of the operator.

Recently, a letter dated letter dated 29 November 2024 from Sir Chris Bryant MP to Council Leaders and Council Chief Executives across the UK in support of digital infrastructure deployment.

The letter confirms the importance of fast and reliable connectivity and the Government's commitment to supporting the delivery of next-generation connectivity across the UK by driving towards nationwide 5G coverage by 2030. The letter requests help from Councils across the UK to achieve these goals by prioritising digital infrastructure and focussing on a number of areas that remain a challenge to telecoms investment.

There is a specific ask in the MP's letter that Councils ***'support the deployment of communications infrastructure wherever possible'*** and this is an important point that should be added into the weight of the application.

The NPPF strongly supports sustainable development, as does the Camden Local Plan, the Camden Planning Guidance – Digital Infrastructure, and the London Plan. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, participate in social media, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. Residents and businesses will enjoy better accessibility, assisting home-base working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work development. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with NPPF, and the Camden Local Plan, the Camden Planning Guidance – Digital Infrastructure, and the London Plan to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

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In such instances, as described above, the NPPF support development that improves the economic, social and environmental conditions in the area. Enhancing the 2G, 4G and 5G coverage and capacity in this area will fully meet this national and local policy objective. Continuing to transform the digital connectivity of the area to drive economic growth and innovation, working to meet national targets of full roll-out of 5G technology and that all populated areas are connected to the 5G network by 2030, will ensure economic growth and social well-being.

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services. This is in full accordance with the aims of the Camden Local Plan, the Camden Planning Guidance – Digital Infrastructure, and the London Plan, all of which aspire to improve connectivity and access to enhanced 4G and 5G services across the region.

The Cornerstone Local Authority Engagement Brochure September 2020 further emphasises the benefits of high-quality mobile connectivity. "Access to a reliable mobile network has become a necessity for many of us. Some of the key benefits it provides:

- Connecting with family, friends, and colleagues at any time around the world.
- Giving the ability to manage our personal information 24/7.
- Keeping us always entertained and informed with the latest news.
- Creating more productive and cost efficiencies for businesses.

The economic benefit:

- Creating more productive and cost efficiencies for businesses.
- Businesses offering online services can extend their products to a broader audience.
- Local areas and businesses can benefit from tourists and visitors as hotels, attractions, and restaurants can be booked online from anywhere in the world.
- Business owners and services like doctors can provide a faster and more cost-effective service by offering both online appointments and ordering.
- Digital connectivity facilitates economic growth, something which the Government is keen to progress and promote.
- 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 facilitate learning on the job procedures, thanks to technologies such as Augmented Reality (AR) goggles, which, for example, can give the likes of engineer's real-time instructions on how to fix a machine on a production line.

The social benefit:

- Mobile communications can help people to stay in touch wherever and whenever, which can help improve social wellbeing.
- Convenient access to online commerce or businesses.
- Contacting emergency services is easier, especially in remote areas.
- Giving the ability to manage our personal finances and information 24/7.
- Using a mobile wherever you go can provide better personal security.
- Having access to social networking sites and applications can keep people entertained with their lifestyles and interests.
- Access to real-time transport information or timetables.
- Smart meter reads for utilities such as gas or electric.
- Contacting local authorities.
- Promotion of smarter and productive ways of working. For example, working from home can help minimise commuting which can provide better work and home life balance.

The sustainability and environmental benefits:

- Facilitating remote access to services, education, and commerce, reducing the need to travel and in turn minimising carbon emissions.
- Better monitoring and control of energy consumption through climate change technology, smart metering and smart energy grids.
- 5G infrastructure requires fewer heat generating electronic components.
- 5G enabling of the Internet of Things (IOT) sensor deployment can manage and alert us to pollution risks, health hazards and flood risk.
- Provision of smart technologies within the agricultural sector will facilitate more efficient and less wasteful practices helping to limit negative impacts.
- 5G networks allow monitoring of traffic flow resulting in less congestion and better air quality. They also make driverless cars possible; a means of transport that offers better fuel efficiency.
- Smart cities and buildings can rely upon 5G networks to enable buildings and infrastructure to use automated energy saving through better and more efficient lighting, heating, cooling and other operations.

The health benefits:

- Support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.
- Patients across the country are now becoming accustomed to using remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.
- 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.

The Education benefits:

- Facilitates access to educational establishment databases or booking systems for securing places for the likes of school dinners, field trips, extra-curricular activities, student/teacher reviews, etc.
- Provides access to school/college/university apps for setting and submitting homework/coursework, ensuring news and notifications are delivered efficiently, and for parent/student/teacher interactions.
- 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.

There is a demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all 3, make it difficult. Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.

Paragraph 39 of the revised NPPF 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…*permission in principle*, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'*.

Providing enhanced 2G, 4G and 5G coverage and capacity service provision in this area will fully meet paragraph 39 of the NPPF, to develop the best-in-class digital infrastructure to underpin the efficient functioning and growth of the regional economy and identify opportunities to improve and accelerate the roll out of fibre, 4G and 5G technologies to accelerate business opportunities and growth to gain regional competitive advantage.

The social and economic benefits are a significant material consideration which should be weighed against the visual impact associated with the installation of new radio base station in this location. HM Treasury outlined such benefits in its report '*Fixing the Foundations: Creating a More Prosperous Nation*' – July 2015. Paragraph 7.1 of the plan stated that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

Paragraph 7.2 goes on to highlight strong support for high quality communications infrastructure. It states:

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'By reducing 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 March, of near universal 4G and ultrafast broadband coverage.'

Indeed, MPs have noted in parliament that the UKs Superfast Broadband connectivity was 'relatively poor' and businesses were losing out from patchy coverage.

The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. That is why the Government is committed to extending mobile geographical coverage further across the UK, with continuous mobile connectivity provided to all major roads and to being a world leader in 5G.

This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage. As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver property at the local level and enable all places to share in the proceeds of growth.

The Government is determined to ensure the UK receives the coverage and connectivity it needs. To this end, the Government wants to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from the investments in the new technology. The proposed installation will fully support these national aspirations.

The case for 5G is compelling as it will bring faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, 5G has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time, creating the so-called "Internet of Things". This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business and farmers, all through the real-time management of data.

The Local Government Association (LGA) has produced a Councillor's Guide to Digital Connectivity and sets out some of the benefits of 5G technology:

- Faster mobile broadband and a more consistent experience in congested areas with a very high number of devices.
- Industrial applications, enabling businesses to improve their productivity, for example through predictive maintenance and real-time analytics.

- Internet of Things (IoT) services, many of which will help council's and businesses deliver services more efficiently including:
    - Transport and logistics: connected parcels and fleet tracking.
    - Health and social care.
    - Environmental monitoring: sensors monitoring air quality and water pollution in real-time.
    - Smart agriculture and smart animal farming, smart retailing.
    - Connected and autonomous cars: allowing cars to communicate with each other, other road users and even the road infrastructure.

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016 (https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx). It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

> *'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global marketplace. Securing digital connectivity is thus critical to the UK's long-term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases.'*

The Assessment goes on to note that '*Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy*'. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of maintaining and enhancing high quality 2G, 4G and 5G coverage and capacity in New Oxford Street area, where the social and economic benefits will outweigh the environmental considerations in line with Policy SI6 of the London Plan, the Camden Local Plan, and the Camden Planning Guidance – Digital Infrastructure.

The Government's continued strong support for connectivity is further evidenced by the DCMS who launched their UK wide Digital Connectivity Portal on 20 December 2018. The Digital connectivity portal provides guidance for local authorities and network providers on improving connectivity in local areas. The Government wants everyone in the UK to benefit from world-class connectivity no matter where they live, work or travel. The Future Telecommunications Infrastructure Review outlines a package of measures to create the right market and policy conditions to deliver world-class connectivity for citizens and businesses. As a result, the pressure to install a new site in this area to provide enhanced 2G, 4G and new 5G service for VMO2 is significant.

On the 23 September 2020, the former Digital Infrastructure Minister Matt Warman MP spoke about the ongoing work by the Government and telecoms industry to boost the UK's world class digital connectivity in his keynote speech at Connected Britain 2020[5]:

> *…'I'd like to take this opportunity to thank everyone in the industry for their tireless efforts at keeping us all connected through an unprecedented period of disruption.*
>
> *…COVID has altered the way we live, work and most importantly, stay connected with our family and friends. The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown – and is now more important than ever as we head into recovery. Many of these changes – such as increased working from home – will stay with us for the foreseeable future.*
>
> *People have referred to the internet as "the fourth utility" – and it's true. For countless people across the country, having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity.*
>
> *That's why I'm committed to working with you to ensure the entire nation has access to world-class, next generation gigabit connectivity that is secure and resilient enough to deal with all sorts of future challenges.*
>
> *This Government is ambitious for the UK's digital infrastructure.*
>
> *And because we know that more citizens are increasingly living their lives online, we will be one of the earliest adopters of 5G coverage, with the majority of the population able to access 5G by 2027.*
>
> *...We know how important local authorities are to the delivery of digital infrastructure, which is why I have written to them, together with the Local Government Minister, to outline how they can work more effectively with the industry…*
>
> *…. Turning to 5G, while the commercial rollout of 5G continues at pace, we're pushing ahead with plans to make sure all sorts of industries benefit from this game-changing technology.*
>
> *…. since the start of the 5G Testbeds and trials programme, we've now funded 24 5G testbeds across the UK. Between them, those testbeds have trialled almost 70 different 5G technologies, products and applications. And more importantly than ever, we are investing in a range of sectors to foster, build and grow 5G cross wider industry...*
>
> *…The world is in the middle of a digital revolution. COVID has accelerated this process, digitised almost every part of our everyday lives and made the infrastructure that*

[5] https://www.gov.uk/government/speeches/matt-warmans-keynote-speech-at-connected-britain-2020?utm_source=01ad07cc-6884-4d9b-a0ca-8c212f0a4289&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate

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connects us more important than ever. That's why it is at the top of the government's agenda…"

In a more recent letter published by the former Digital Infrastructure Minister Matt Warman MP on the 24 May 2021 he spoke further about the Government's Commitment to extending mobile coverage:

'Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data is increasing rapidly, and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity…

…The Government is committed to extending mobile network coverage across the UK and providing uninterrupted mobile signal on all major roads, and our ambition is for the majority of the population to have access to a 5G signal by 2027…

…The National Planning Policy Framework ("the Framework") for England states that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology, such as 5G…

…In relation to electronic communications development, it also states that local planning authorities must determine applications on planning grounds only and they should not seek to prevent competition between different operators or question the need for an electronic communications system. As set out in planning practice guidance, it is in the public interest for local planning authorities to have effective delegation arrangements in place to ensure that decisions on planning applications that raise no significant planning issues are made quickly and that resources are appropriately concentrated on the applications of greatest significance to the local area'.

This Keynote Speech by Matt Warman MP highlights the importance that Government places on 5G and advanced, reliable, high quality 5G technology. To prevent this technology from being brought into the area would be contrary to the Government's key aims.

On the 1 October 2020, as part of the Speed up Britain Campaign, The Centre of Policy Studies Report published '*Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution*'[6]. The report identifies what the 5G opportunities are and what the Government needs to do so we can all benefit from this vital new technology. It states that delays to the rollout of 5G could cost the country tens of billions of pounds in lost economic output. The former Government advisers Alex Jackman and Nick King argue that Government's 'levelling up' agenda and the UK's recovery from the COVID-19 pandemic is at risk without a faster 5G rollout – to the tune of £41 billion.

The report highlights that if delays continue at their current rate, by 2027, over 11 million households and businesses could be missing out on vital digital connectivity. Improving digital

[6] https://www.cps.org.uk/research/upwardly-mobile

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infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities.

The report states that '*the UK must have a functioning network to now support the recovery from the pandemic, empowering businesses and communities with wider coverage, and preparing the ground for the services that 5G can provide*'.

Using analysis by the independent consultancy Policy Points, the report estimates that if 5G coverage reaches a quarter more of the population than the Government's current target of 51%, it will produce GDP gains of £41.7 billion by 2027. It highlights that the difference between the UK being a leader and a laggard in 5G adoption could be as much as £173 billion in incremental GDP over the coming decade, as estimated by the Future Communications Challenge Group.

The manufacturing, construction and agricultural sectors have been hit particularly hard by the pandemic, and these would benefit significantly from improved connectivity. However, onerous planning rules and loopholes in existing legislation are slowing down the infrastructure upgrades needed to make the most of this mobile revolution in these much-needed industries.

Digital networks and services have underpinned our resilience to the COVID-19 pandemic, and they will drive our recovery. By expanding them, we deliver not only immediate benefits but also the essential foundation stone for future prosperity.

The report highlights that while 5G promises to create economic benefits through increased capacity, reliability and speed – vastly improving business productivity and removing barriers imposed by poor digital connectivity – the system is plagued by red tape.

The report acknowledges that the gains are not just at national level. A more extensive digital infrastructure helps local areas to attract and retain businesses and talent, thereby playing a vital role in reducing regional inequalities. Providing a supportive environment for digital infrastructure is one of the few things the Government can do those costs little, boosts growth and helps level up the UK…. the key is speed. **The faster a network is built, the bigger the regional gains** (emphasis added). The telecommunications industry faces challenges on this front. The COVID-19 pandemic has increased demand on networks but delayed the availability of new spectrum to provide additional capacity.

The report notes that the reliability and reach of 4G is more important than ever. It is needed both to quench immediate demand, and also to facilitate future 5G rollout, as the underlying passive infrastructure will initially support both technologies. Every failure to provide better coverage not only presents an immediate opportunity loss for local business and consumers but also has a bigger downstream economic impact. It acknowledges that productivity gains to business, equality gains for regions and economic gains for the country are only as achievable as the networks they can access.

The report recommended that the Government should reform the strategic planning framework to compel local authorities to ensure that the needs of future mobile connectivity are adequately addressed in Local Plans and that new developments are assessed on how they might impact, or could support, local connectivity.

In the recent Levelling Up and Regeneration Bill[7], which set out "12 bold, national missions" which will be given legal status, Mission 4 is:

"By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for most of the population".

It highlights the important benefits that high quality, reliable connectivity can provide, particularly in rural areas. It states:

"The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working. However, there are significant spatial disparities in the quality of broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas."

The proposed installation in this location will allow the operator to provide high quality enhanced 2G, 4G and 5G coverage and capacity service provision supporting the Government's aim of 'focusing on ensuring that everyone is connected to the information superhighway'. This fully meets the aspirations of the NPPF, the Camden Local Plan, the Camden Planning Guidance – Digital Infrastructure, and the London Plan.

The proposed installation in this location will ensure that the expansion of the electronic communications network is facilitated, and that high quality communications infrastructure is provided to the immediate area. This is in full accordance with the operator's 5G license obligations and the Council's aims and aspirations to expand and improve telecommunications mobile coverage as required and to have the latest high quality 5G infrastructure, promoting and growing the digital sector and increasing digital inclusion.

Practical Applications of 5G Connectivity as Example of Material Socio-Economic Benefit:-

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.

[7] https://www.gov.uk/government/publications/levelling-up-the-united-kingdom

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.

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.

Summary

It has been shown that the provision of advanced high quality and reliable communications infrastructure is essential for sustainable economic growth and plays a vital role in enhancing the provision of local community facilities and services in accordance with the Camden Local Plan, the Camden Planning Guidance – Digital Infrastructure, and the London Plan.

A new site at this location is needed to provide partial coverage replacement for a former base station site located atop of Castlewood House at the junction of New Oxford Street and Earnshaw Street. It was a well-established shared mobile telecommunications serving the New Oxford Street, St Giles High Street and Tottenham Court Road Underground station area. The reason behind the replacement is that the Landlord, due to redevelopment of Castlewood House, served a 'Notice to Quit' (NTQ), legally requiring the applicant to remove their equipment. The Landlord's proposal to redevelop the site for an 11-storey mixed used development was approved under LPA ref: 2017/0618/P. Without the replacement site the coverage in this cell area will be lost by the operator leading to a gap in their network.

Site selection was progressed in accordance with the applicant's licence obligations, advice in the NPPF and the Code of Practice and represents the least environmentally intrusive, technically suitable, available option. It has been demonstrated that there are no more suitable sites that could provide this essential service to this cell area.

The proposed scheme will not represent a prominent and alien feature out of character with the locality by reason of its design, scale and siting, especially so after its redesign which has greatly reduced the size and subsequent visibility of the support structures and antennas.

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As radio base stations must provide coverage on the operator's network, their siting options are limited by technical constraints. Therefore, even if there are sites within the search area that could potentially have a smaller visual impact on public amenity, they might not be suitable from an operational perspective. This was recognised by the Inspector in a recent appeal (Ref: APP/C5690/W/23/3334595). In paragraph 13, the Inspector stated: "…*Whilst there may be sites which are better sited in respect of character and appearance as well as amenity considerations, there is little point in assessing those sites if they do not meet operational requirements to support high quality communications*…".

It has been demonstrated that the proposed 36.10m height is the lowest possible that allow VMO2 to enhance their 2G, 4G and 5G service to the surrounding area. At lower heights, the antennas would be blocked by the rooftop and surrounding urban clutter.

3G (and eventually 2G) is being switched off by the operators in order to repurpose these radio frequencies for faster more energy-efficient 4G and 5G services. 3G is primarily used for mobile data services. It is being switched off first because it has already largely been superseded by 4G. hence the importance of providing the latest 4G and new 5G service provision in areas where there is no such coverage. 3G has already been switched off by Vodafone and EE in early 2024, and VMO2 (known as O2) is planning to do the same. Whilst no firm timescales have been announced as to when this will happen, it is expected to occur by 2025. As a result, it is imperative that the operator builds resilience into the network.

There are no more sequentially preferable sites that would provide the required enhanced 2G, 4G and 5G coverage to be provided that would cause less visual harm than this proposal.

The major changes compared to the previously rejected scheme strike a much better balance between this essential infrastructure and on any additional impact on the surrounding conservation area and should be looked upon much more favourably than the previous scheme.

The less than substantial harm arising from the proposals is outweighed by the public benefits. The social and economic benefits of providing reliable and high-quality mobile broadband connections including 5G support growth in productivity, efficiency and labour force participation across the whole economy is a strong material consideration in the determination of this application. It is fully supported by the NPPF, the Camden Local Plan, the Camden Planning Guidance – Digital Infrastructure, and the London Plan. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area as set out above in the preceding paragraphs.

Confirmation that submitted drawings have been checked for accuracy

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