

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Central Cross	Site Address:	Tottenham Court Road London W1T 1BJ
National Grid Reference:	529686, 181506		
Site Ref Number:	77564	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing sites)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why: No register available.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: N/A		

Site specific pre-application consultation with local planning authority

Was there pre-application contact:	Yes	No
Date of pre-application contact:	N/A	
Name of contact:	N/A	
Summary of outcome/Main issues raised: Pre-application correspondence was sent to Camden Council by email on 2 December 2019. No response has been received.		

¹ Macro or Micro

Community Consultation

Rating of Site under Traffic Light Mode If Required:	Red	Amber	Green
Outline Consultation carried out: Pre-application consultation letters were sent by email on 2 December 2019 to the Bloomsbury Ward Councillors – Councillors Francis, Harrison and Madlani.			
Summary of outcome/Main issues raised: No comments have been received.			

School/College

Location of site in relation to school/college (<i>include name of school/college</i>): The site is close to the following establishments: <ul style="list-style-type: none"> Ecole Jeannine Manuel - 43-45 Bedford Square, London, WC1B 3DN YMCA Club - 112 Great Russell Street, London, WC1B 3NQ
Outline of consultation carried out with school/college (<i>include evidence of consultation</i>): Correspondence was sent to the establishments on 2 December 2019.
Summary of outcome/Main issues raised: No responses have been received.

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	16 December 2019	

3. Proposed Development

The proposed site: EE and H3G previously had equipment located on Castlewood House on New Oxford Street (within the Westminster City Council area). The operators were served with a Notice to Quit the site as the building is to be redeveloped, and the site has now been decommissioned. Therefore, a new site is required in the area to provide replacement coverage for both EE and H3G. A previous proposal, on 14-28 Oxford Street (again within Westminster), to replace coverage was refused due to its perceived impact on heritage assets (part of the building is Grade II listed and is within a conservation area) – application refs. 19/05743/FULL and 19/05744/LBC.
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The application site is a substantial building. Central Cross has its main frontage onto Tottenham Court Road to the east, and is bounded to the north by Stephen Street. The building has retail uses at ground level, and is commercial in use above. There are a number of conservation areas around the site (Hanway to the south in Westminster, Charlotte Street to the north and Bloomsbury to the east). The application site, however, is not located within a conservation area. There are listed buildings in the surrounding area, however none close adjacent to or opposite the site.

The proposal involves the installation of 12 no. antenna apertures on the roof of the building, four to the north, four to the west and the remaining 4 to the south. 2 no. transmission dishes are proposed adjacent to the antennas to the north of the building with 2 no. to the south. Equipment cabinets are proposed on the western side of the roof. The development would provide replacement and improved connectivity and network enhancement to the surrounding area for both EE and H3G. In addition, it will be possible to provide 5G coverage to the surrounding area without further external changes to the installation.

Type of Structure (e.g. tower, mast, etc):		<i>Rooftop</i>
Description: The installation of 12 no. antenna apertures, 4 no. transmission dishes and 8 no. equipment cabinets on the roof of the building and development ancillary thereto.		
Overall Height:	64.47 metres to top of antennas	
Height of existing building (where applicable):	57.69 metres (upper roof level)	
Proposed Equipment Housings:		
Length:	3 x 0.77m/ 1.2m/ 1.2m/ 0.75m/ 2 x 0.64m	
Width:	3 x 0.77m/ 0.41m/ 0.48m/ 0.6m/ 2 x 0.6m	
Height:	3 x 2.5m/ 1.7m/ 0.9m/ 2.1m/ 2 x 2.18m	
Materials (as applicable):		
Tower/mast etc. – type of material and external colour:	N/A	
Equipment housings – type of material and external colour:	Steel with a grey finish.	

Reasons for choice of design:
<p>In designing the proposed replacement installation, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.</p> <p>There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the links into the network either by fibre cabling or by dish antennas, power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.</p> <p>The application proposes to utilise three locations on the roof to site equipment. This allows the height of the equipment to be kept to a minimum. An alternative would be to install a stub tower more centrally on</p>

the building, however this would result in a more substantial and taller structure and is not considered as suitable as the chosen design. The section of the building to host equipment is set well back from the Tottenham Court Road frontage, allowing replacement to be provided with only a minimal impact. The building is substantial and the height and bulk of the building will ensure only a minimal impact.

The development would provide replacement and enhanced 2G, 3G and 4G coverage for EE and 3G and 4G for H3G. The site has also been designed to provide 5G coverage and future technologies for both EE and H3G without any further changes to the external appearance of the development. This will ensure that the surrounding area will be at the forefront of the next advance in technology being deployed.

By utilising a rooftop site, for two Operators and for multiple technologies, the proposed development achieves replacement and enhanced coverage to the area with only a minimal visual impact. It is considered, overall, that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below).	Yes	No
<p>International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.</p>		
<p>When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account.</p>		
<p>In order to minimise interference within its own network and with other radio networks, EE Ltd & H3G UK Ltd operates its networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p>		
<p>As part of EE and H3G's networks, the radio base station that is the subject of this application will be configured to operate in this way.</p>		
<p>All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.</p>		
<p>The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.</p>		

4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

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

The development is required to provide replacement coverage and improved connectivity and network enhancement to EE and H3G in the area. As noted above, apart from providing 2G, 3G and 4G coverage, 5G coverage will be deployed from the site without the need for further changes, ensuring the surrounding area benefits from the latest technology.

High quality communications infrastructure is essential for sustainable economic growth. High-speed broadband technology and other communications networks can play a vital role in enhancing the provision of local community facilities and services. Furthermore, mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

One of numerous benefits of this, on a wider scale, is that this allows for an increase in home working, by providing the opportunity to create a "virtual office", reducing in the need to travel for work as a consequence, which is helpful in supporting the sustainable development agenda.

The UK Government, recognising the benefits to commerce, industry and the public in general, places great emphasis on the benefits of mobile telecommunications to modern life. This position was reinforced by a statement made by then Prime Minister David Cameron in March 2016 when he specifically addressed the vital importance of mobile connectivity for residents and local economies and highlighted that the urgent delivery of the required network improvements is a Government priority;

"Ten years ago, we were all rather guilty of leading campaigns against masts and all the rest of it. Our constituents now want internet and mobile phone coverage. We need to make sure that we change the law in all the ways necessary, that the wayleaves are granted, that the masts are built, that we increase coverage and that everyone is connected to the information superhighway. This is substantiated in the most recent budget announcement of 16th March 2016, which commits to provisions for "greater freedoms and flexibilities for the deployment of mobile infrastructure".

It is noted that the equipment is proposed to be located on the roof of a Local Authority owned building. A recent 2018 report – "Councils & Connectivity – How local government can help to build a mobile Britain" encourages local government to help create an environment that is conducive to the building of mobile infrastructure. The report notes *"using public buildings, structures and open land to install mobile infrastructure has supported widespread improvements to connectivity."*

Predictive coverage plots are included with the application to confirm the need for replacement coverage to the area. Plots are included for both EE and H3G, with 3G and 4G coverage plots for both Operators. On all of the plots the ideal level of coverage is shown as red. For each Operator and each technology plots are included to show the coverage that was provided from Castlewood House (the recently decommissioned site), coverage without Castlewood House, and proposed coverage from Central Cross. The plots confirm that without the site on Castlewood House (annotated as 98116 – NTQ on the plots) coverage drops below levels required to provide an acceptable level of service to customers. Including this application site coverage levels are restored to an acceptable level, with an overall level of improvement. Capacity would also be improved. It is noted that the 4G plots for EE show no change, however there would be a capacity improvement.

Further details of the new 5G technology is included within this application in the form of the 5G and Future Technology document.

5. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

Site	Site Name and address	NGR:	Reason for not choosing
RT	14-28 Oxford Street, London, W1D 1AU	529766, 181391	Panning and listed building consent applications were refused due to impact on heritage assets (part of the building is Grade II listed and is within a conservation area) – application refs. 19/05743/FULL and 19/05744/LBC. The option has therefore been discounted.
RT	Prospect House, 80-110 New Oxford Street, London WC1A 1HB	529962, 181431	The site would not provide as suitable replacement coverage as the preferred option, therefore this option has been discounted.
RT	Wingate House, 93-107 Shaftesbury Avenue, London W1D 5BT	529814, 180980	The site would not provide as suitable replacement coverage as the preferred option, therefore this option has been discounted.
RT	St Giles Hotel, Bedford Avenue, London WC1B 3GH	529819, 181502	The rooftop of the building is not suitable for accommodating the necessary equipment and there are lots of different floor levels causing potential clipping and ICNIRP issues.
RT	TUC building, Congress House, 23-28 Great Russell St, London WC1B 3LS	529939, 181485	The roof is surrounded by taller buildings. A substantial structure would be needed on the building and this would harm heritage assets around the site.
RT	Dominion Theatre, Tottenham Court Road, London W1T 7AQ	529851, 181435	The roof is surrounded by taller buildings. A substantial structure would be needed on the building and this would harm heritage assets.
RT	Gresse Street Flats, London W1T 1QW	529665, 181485	This building has been discounted as it is too low. It would not provide the required level of replacement coverage from the site.
RT	Charlotte Building, Gresse Street, London W1T 1QL	529659, 181438	This building has been discounted as it is too low. It would not provide the required level of replacement coverage from the site. In addition, access to the roof is difficult.

If no alternative site options have been investigated, please explain why:

N/A

Additional relevant information:

Siting and Appearance

It is considered that the proposed location is the least visually intrusive site and design available to the applicant which also ensures suitable replacement and enhanced coverage can be provided to the area. It is considered the development would not appear excessive. The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding harm to the setting, both in terms of visual amenity and ensuring heritage assets would not be harmed.

It is considered its appearance would not appear excessive due to the height and bulk of the building. Any impact would be outweighed by the significant benefits of the proposal, with two Operators achieving continued and enhanced coverage to the area. The site would provide coverage for both EE and H3G, therefore helping to keep the overall number of installations to a minimum. The building is set back from Tottenham Court Road, it is outside of a conservation area and not immediately adjacent to listed buildings. In a very difficult area to search a suitable option has been located. Views of the equipment would be limited.

It is also noted that equipment on Castlewood House has been decommissioned and will be removed. This removal of equipment, which was visible along New Oxford Street, should be taken into account. The overall number of installations in the area would remain unchanged.

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the less than substantial harm it may impose on the surrounding area being balanced by the provision of replacement and enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2019) (NPPF)

The new National Planning Policy Framework, which came into force in July 2018, replaces the guidance published in March 2012. The guidance has subsequently been updated in February 2019. The NPPF sets out the Government's planning policies for England and how these should be applied.

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

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

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

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural

resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

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

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

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

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

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

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

The proposed development will enable the provision of continued and enhanced mobile communications services to the surrounding area, bringing about substantial public benefit both socially as well as the allowing for certain businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the ‘virtual office’, thus reducing the need to travel and contributing to the sustainability agenda.

Government advice in recent years has been to promote and encourage communications services. Within his presentation to Parliament in July 2015 of the Government report “Fixing the Foundations: Creating a more prosperous nation” the Chancellor of the Exchequer reiterated the importance of a high-speed digital communication infrastructure. *“7.1 Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.*

By reducing regulatory red tape and barriers to investment, the government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK’s businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published in March, of near-universal 4G and ultrafast broadband coverage.”

The NPPF (2019) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA’s strategic policies must make sufficient provision for:

*“b) infrastructure for transport, **telecommunications** (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)”*

Leading on from this, paragraph 112 states that *“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections”.*

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 113 states that *“The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum*

consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged”.

By utilising a rooftop site to provide continued and enhanced coverage for two Operators and for multiple technologies, the proposal is in line with the above policy.

It should be noted that paragraph 116 states that “*Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure*”.

In terms of heritage assets, section 16 of the guidance deals with ‘Conserving and enhancing the historic environment’. Paragraph 184 sets out that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 196 states: “*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*” It is considered there would be a less than substantial harm, being located outside of a conservation area and located on a tall substantial building, and that any very limited harm would be outweighed by the significant benefits of the proposal.

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

Development Plan Policy

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

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

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

The London Plan

The London Plan sets out the Mayor’s planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In Paragraphs 1.38-1.41 ‘Ensuring the infrastructure to support growth’, the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to secure its long-term growth.

It is considered that the applicants’ networks are an integral element in securing the Mayor’s vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in Policy 4.11 ‘Encouraging a Connected Economy’ of the Plan, which states that:

“A. The Mayor and the GLA Group will, and all other strategic agencies should:

a. facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data

centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive broadband access meeting the needs of enterprises and individuals.

b. support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits.”

At paragraph 4.55 of the supporting written justification to policy 4.11, the Mayor “wishes to ensure sufficient ICT connectivity to enable communication and data transfer within London, and between London, the rest of the UK and globally” and “...support ubiquitous networks – those supporting use of a range of devices to access ICT services beyond desk-based personal computers..” Furthermore, at paragraph 4.57, the Mayor states the intention to “...support competitive choice and access to communications technology, not just in strategic business locations but more broadly for firms and residents elsewhere in inner and outer London, and to address e-exclusion amongst disadvantaged groups.”

Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing EE and H3G to provide continued and enhanced high-quality coverage to the surrounding area.

Local Plan

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

It is considered the proposal complies with both policies. The scheme has been specifically designed for this location. The host building is substantial and the proposal would have a minimal impact on the application site and the surrounding area. Although visible from certain viewpoints any impact would be minimal, as the building is tall and the roof where the equipment is proposed to be located is set well-back from the main Tottenham court road frontage. The building is not located within any designated area, however is close to designated conservation areas, and there are a number of listed buildings in the surrounding area. The sympathetic design ensures there would be no harm to heritage assets.

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

The proposal therefore complies with the above policies and no conflict with any other aspect of the plan has been identified.

Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for a continued and improved quality of service.

The specific requirement of the operators in this instance is to provide replacement and enhanced coverage to the area, with a minimal impact and without harm to the local environment. The proposed development is compliant with the NPPF. Thus, siting and design are considered the most appropriate solution to providing the coverage requirements to the area.

The proposal is fully compliant with ICNIRP guidelines.

Confirmation that submitted drawings have been checked for accuracy

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