SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Matilda Apartments	Site Address:	Matilda Apartments 4 Earnshaw Street London WC2H 8AJ
National Grid Reference:	529963, 181325		
Site Ref Number:	99309	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 22 September 2020. 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 22 September 2020 to the Holborn and Covent Garden Ward Councillors – Councillors Fulbrook, Olad and Vincent.

Letters were also sent to the residents of Matilda Apartments on 22 September 2020 – Flats 1 – 53.

Summary of outcome/Main issues raised:
A total of 9 residents from Matilda Apartments have objected to the proposed development. Their concerns and objections are summarised as follows:

- Don't want 5G aerials on the roof of the building.
- A commercial building should be used rather than a residential building.
- The building is of significant architectural value, being designed by Renzo Piano.
- The architect and freeholder have objected to previous proposals on the building.
- The development would be a health hazard.
- The installation and on-going running of the equipment would be a nuisance for residents.
- Office buildings in the Central Saint Giles Development are considered more suitable.
- Putting antennae on the roof will take away from the design of the building and look terrible.
- Queries were raised regarding the purpose of the consultation.
- The building is on the cusp of a conservation area and the equipment would be an eyesore.
- Previous objections have been objected to by residents.

Responses have been sent noting the objections, and setting out that the site was chosen due of its proximity to the Castlewood House site.

School/College

Location of site in relation to school/college *(include name of school/college):*
There are no schools close to the proposed site. The closest is Ecole Jeannine Manuel on Bedford Square, which is approximately 300 metres to the north of the site. However, the site is closer to the YMCA Club on Great Russell Street.

Outline of consultation carried out with school/college *(include evidence of consultation):*
Correspondence was sent to the YMCA Club on 22 September 2020. No correspondence was sent to Ecole Jeannine Manuel due to the distance from the site.

Summary of outcome/Main issues raised:
No response has 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:	10 December 2020	

3. Proposed Development

The proposed site:

EE and H3G previously had equipment located on Castlewood House on New Oxford Street (immediately to the north of the application site). The operators were served with a Notice to Quit the site due to redevelopment, and the site has now been decommissioned. Therefore, replacement coverage for both EE and H3G is needed. Due to previous coverage deficiencies, and the ever-increasing current and future demand for mobile communications, it is proposed to meet this current and future coverage requirement with two new sites, the site the subject of this application and Central Cross on Tottenham Court Road (there is a current planning application for the Central Cross Proposal – application reference 2020/2469/P).

The application site is a modern 15-storey building, part of the Central St Giles development. It is located in the north-western corner of the Central St Giles development, at the junction of Earnshaw Street and Bucknall Street. The building has retail uses at ground level, and is residential in use above. There are a number of conservation areas around the site, including Bloomsbury to the north and Denmark Street to the west. The application site, however, is not located within a conservation area. There are also listed buildings close to the site, the closest being to the west across Earnshaw Street. The site is shown on the photograph below:

The proposal involves the installation of 6 no. antenna apertures on the roof of the building, two towards the north-east corner, two to the south and the remaining two on the western side of the building. Equipment cabinets are proposed centrally on the roof and 2 no. transmission dishes are proposed adjacent to the cabinets. The development would provide replacement and improved connectivity and network enhancement to the surrounding area for both EE and H3G. In addition, 5G coverage will be provided.

Type of Structure *(e.g. tower, mast, etc):*	*Rooftop*
Description: The installation of 6 no. antenna apertures, 2 no. transmission dishes and 8 no. equipment cabinets on the roof of the building and development ancillary thereto.	
Overall Height:	55.8 metres to top of antennas
Height of existing building *(where applicable):*	48.8 metres (to top of steelwork frame)
Proposed Equipment Housings:	
Link AC Cabinet:	1.2m (width) x 0.6m (depth) x 1.8m (height)
3900A Cabinet:	0.6m x 0.48m x 1.6m
Furo Cabinet:	0.75m x 0.6m x 2.1m
H3G APM5930 Cabinet:	0.64m x 0.6m x 2.16m
EE APM5930 Cabinet:	0.64 x 0.48m x 1.2m
3 x Equipment Cabinets:	0.77m x 0.77m x 2.1m
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:

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.

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.

The application site is a substantial and tall building, ensuring the impact from ground level would not be significant. Antennas need to be located close to the edge of the building for technical reasons, so that the signal doesn’t clip the edges of the building. This allows the height of the antennas to be kept to a minimum. Photomontages, discussed later in this document, illustrate the impact of the equipment and confirm this minimal impact.

As far as the equipment cabinets are concerned, they have been located centrally on the roof of the building to minimise impact. They would not be visible from ground level due to the height of the building. There is an existing screen on the roof of the building, covering the existing substantial amounts of plant on the building. Initially, the preferred location for the equipment cabinets was beneath the existing screen.

Unfortunately, there is insufficient space and the only location for the equipment is above the screen. Despite this, as already mentioned, the central location would limit its impact to an acceptable level.

The development would provide replacement and enhanced 2G, 3G and 4G coverage for EE and 3G and 4G for H3G, as well as providing new 5G coverage. This will ensure that this busy part of Central London 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). 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. 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, 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 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. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.	**Yes**	No

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, 4G and coverage, the site would also provide 5G coverage to the area for both EE and H3G.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other and by cables or wireless technology 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. There are several variables that determine the size and shape of each cell.

Base stations are low powered radio transmitters and they each have a limited range, meaning that they generally need to be located close to the area requiring coverage. As one moves too far away from that area then it is likely that some areas will remain without the services they previously enjoyed.

High quality communications infrastructure is essential for sustainable economic growth and that high-speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.

The UK Government recognise the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. 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.

Ofcom's Communications Market Report 2018 provides a figure of 92 million active mobile subscribers in the UK at the end of 2017. It details that 78% of adults now use a smartphone and that 76% of mobile users are using their devices for web and data access. Figures within the report also confirm that users are spending an increasing amount of time per day using their devices. 68% of participants in the Touchpoints research reported that they "could not live without" their mobile phone (rising to 78% among 25-34s). Whilst not included within the research figures, anecdotal evidence suggests that this number is greater still amongst those aged under 18. All of which points towards the nations increasing dependency on mobile services and connectivity.

As recognised by the London Assembly's Regeneration Committee within its "Digital Connectivity in London" report, published June 2017, digital connectivity is now widely regarded as the "'fourth utility', an everyday necessity alongside water, gas and electricity" and also noted that "mobile broadband is, and will continue to be, an essential complement of fixed broadband". It is no longer a luxury, but a service essential to modern life.

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".

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. The area map shows the previous Castlewood House site which has now been removed (annotated NTQ - 98116). It also shows the sites proposed to provide replacement and enhanced connectivity to the area. The application site is the southernmost site (annotated REP - 99309). The other site shown is Central Cross on Tottenham Court Road (which is the subject of a separate application).

For both 3G and 4G coverage red levels of coverage are required to provide a good level of service. For each Operator and each technology plots are included to show the coverage that is currently provided (with the Castlewood House site removed), coverage with the proposed application site (99309), and proposed coverage from the application site and from Central Cross (77564). The plots confirm that without the Castlewood House site 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 a significant level of improvement to the area with the application site and Central Cross. Capacity would also be improved in this busy area of Central London, and new 5G coverage would also be provided.

Further details of the new 5G technology are included within this application in the form of the 5G and Future Technology document, and the 5G guide from Ofcom.

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	Endeavour House, 189 Shaftesbury Ave, London WC2H 8JR	530044, 181259	The site is further from Castlewood House and this option would not provide as suitable replacement coverage as the application site.
RT	127 Charing Cross Road, London WC2H 0EW	529829, 181230	The site would not provide as suitable replacement coverage as the preferred option as it is a lower building. It is also moving from the search area towards an existing installation to the south-west. This option has therefore been discounted.

RT	Wingate House, 93-107 Shaftesbury Avenue, London W1D 5BT	529814, 180980	This site is too close to existing installation to the south-west. Use of this building would duplicate coverage and not meet the coverage requirement.
RT	151 Shaftesbury Avenue, London, WC2H 8DG	529944, 181117	This site is too close to existing installation to the south-west. Use of this building would duplicate coverage and not meet the coverage requirement.
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	TK Maxx, 120 Charing Cross Road, London, WC2H 0JR	529880, 181192	There is insufficient space on the roof of the building to accommodate the required equipment.
RT	Travelodge, 1 Museum Street, London WC1A 1JR	530196, 181396	This building has been discounted as it is too far to the east of the search area. It is close to an adjacent site and would not provide the required level of coverage to the target area.
RT	Google, Central St Giles, London, WC2H 8AG	530043, 181350	This is the largest building of the complex. Placing antennas at the edges of the building would result in extremely long feeder cables from the antennas to the equipment cabinets, and this would result in the site not working as efficiently as the preferred option. This option has therefore been discounted for technical reasons.
RT	St Giles in the Fields Church, St Giles High Street, London, WC2H 8LG	529962, 181259	This is not considered a suitable option as it is a Grade I listed building – use of the building would harm heritage assets.
RT	Fairgate House, New Oxford Street, London, WC1A 1HB	529996, 181441	This building is lower than the application site, it is within a conservation area and the parapet of an adjacent building would block signal rendering coverage insufficient. This option has therefore been discounted.
RT	279 Tottenham Court Road, London, W1T 7RJ	529852, 181407	This building is Grade II listed and located within a conservation area, it has been discounted due to its unacceptable impact on heritage assets.
RT	25 Soho Square, London, W1D 3QR	529741, 181205	This site is too far outside of the search area to provide the required level of coverage to the target area.

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

N/A

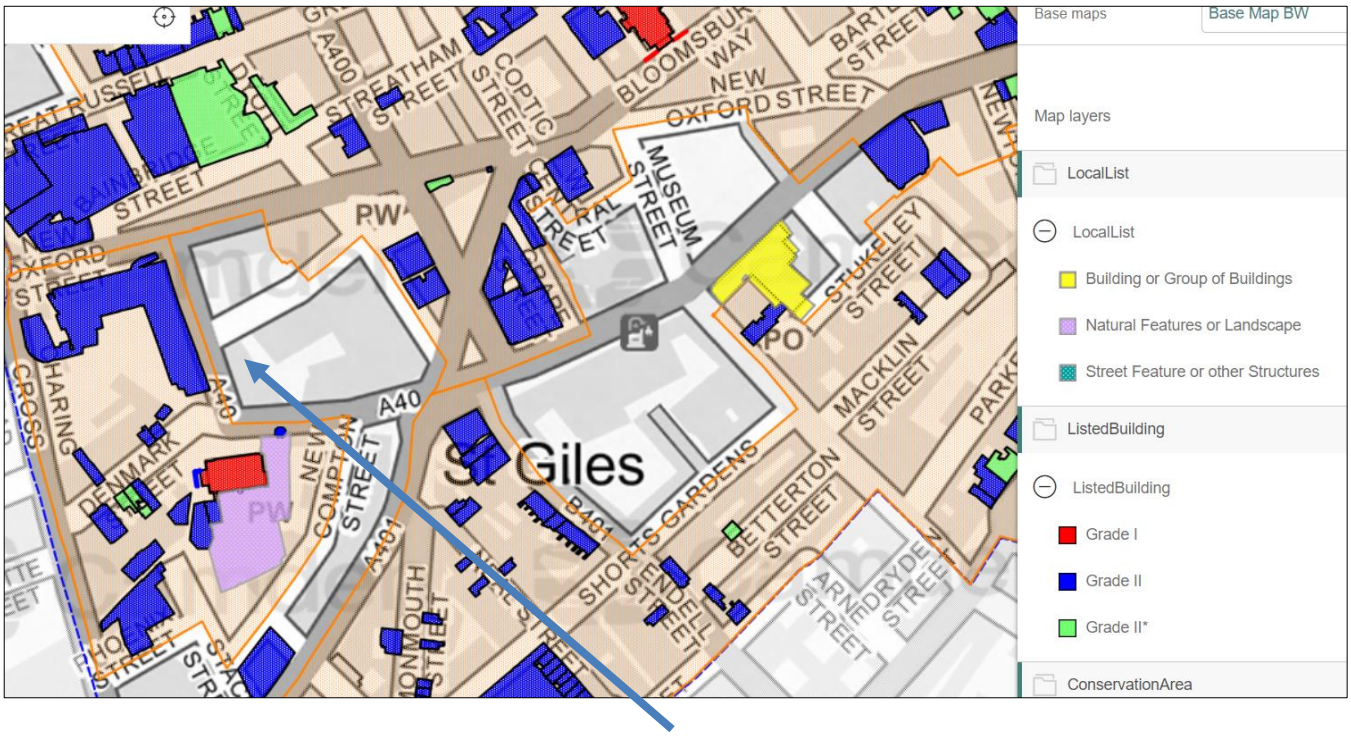
Additional relevant information:

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 and the location of the equipment cabinets set back centrally on the roof. 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.

Siting opportunities which do not impact upon heritage assets are minimal. Virtually every building in the area is either within or adjacent to a conservation area, and there are numerous listed buildings within the search area. The map below (an extract from the Council's mapping system) illustrates this point. Conservation areas are shaded with listed buildings also shown:



Application site

The application site is outside of a conservation area. There is still an impact on heritage assets as the building is close to a conservation area boundary, and also to a number of listed buildings. Therefore, any site chosen will be either within or close to a conservation area, and also would be close to listed buildings. **It is not be possible within the search area to find a site which doesn't have an impact on heritage assets.**

It is also noted that Castlewood House has now been demolished. This previous development, which was visible along New Oxford Street, should be taken into account as part of the assessment of this current application. This site was also adjacent to a conservation area, and close to listed buildings.

Photomontages have been produced to give a better indication of how the equipment would be viewed if built. The following locations were used to produce the montages:

- From St Giles Churchyard looking north towards the application site.
- Looking south from the junction of New Oxford Street and Earnshaw Street.
- Looking north-east from the junction of Denmark Street and Tottenham Court Road.

The montages confirm that from ground level the antennas would be visible as these need to be located on the edges of the building to comply with ICNIRP guidelines. The equipment cabinets have been sites more centrally and would therefore not be widely visible from ground level. Although some equipment would be visible, the impact is considered minimal. It is noted the montage from the junction of New Oxford Street and Earnshaw Street will have a reduced impact as the replacement Castlewood House building is completed, screening the building more fully from New Oxford Street.

Generally, the montages confirm that, although visible, the equipment would not cause harm to the surrounding area, or to heritage assets. As set out above the less than substantial impact would be outweighed by the substantial benefits of the proposal.

Within the constraints set out above, and with the specific location of the equipment, it is considered that the development would result in a less than significant harm to heritage assets. Whilst the equipment would be visible from certain viewpoints the impact would be limited.

The importance of improved connectivity and the significant public benefits of telecommunications proposals has been cited in recent appeal decisions. An example is appeal reference APP/V5570/W/20/3246770 for a rooftop development within the London Borough of Islington. In allowing the appeal the Inspector noted at paragraphs 20, 21, 26 and 27:

> *"20. As set out in the National Planning Policy Framework (February 2019) (the Framework), any less than substantial harm to designated heritage assets should be weighed against the public benefits of the proposal.*
>
> *21. As set out in the Framework, advanced, high quality and reliable communications infrastructure is essential for economic growth and social wellbeing and planning decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. The scheme would support high quality communications and digital connectivity by providing 2G, 3G and 4G connectivity for two different nationwide networks that have a high market share in cumulative terms, as well as the future ability/opportunity to upgrade to 5G services.*
>
> *26. I am mindful of the statutory duties that require special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas and of preserving or enhancing listed buildings, their settings or any special architectural or historic interest which they possess. I am also conscious that the Framework indicates that, when considering the impact of a proposal upon the significance of designated heritage assets, great weight should be given to the assets' conservation. This is irrespective of whether any identified harm to its significance is at a substantial or less than substantial level.*
>
> *27. Nevertheless, I am content that the minor level of less than substantial harm that I have identified to multiple designated heritage assets, even when considered in a cumulative sense, would be outweighed by the significant public benefits that would be achieved by the proposal."*

In terms of the balancing exercise for this proposed development, it is considered that there would be a less than substantial harm, and that the significant public benefit would outweigh the less than substantial harm.

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the 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).

<u>The London Plan</u>

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 very tall and substantial and the proposal would have a minimal impact on the application site and the surrounding area, as confirmed by the photomontages included with the application. The equipment would be visible from certain viewpoints, particularly the antennas, however any impact would be minimal, as the building is very tall and the equipment cabinets are proposed centrally on the building. 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. Although having an impact on heritage assets, any building in the search area would be either within or adjacent to a conservation area, and close to a listed building. The impact of the development on heritage assets is considered less than substantial and the impact would be outweighed by the significant benefits of the proposal.

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

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

Name (Agent):	Chris Andrews, Waldon Telecom	Telephone:	01932 411 011
Operator:	EE Ltd & H3G UK Ltd	Fax no:	01932 411 012
Address:	C/o Agent	Email Address:	chris.andrews@waldontelecom.com
Signed:	Chris Andrews	Date:	15/11/2020
Position:	Planner	Company (Agent): (on behalf of EE Ltd & H3G Ltd)	Waldon Telecom (Agent) Phoenix House Pyrford Road West Byfleet Surrey KT14 6RA