BEACONCOMMS
TELECOMMUNICATIONS INFRASTRUCTURE
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# SUPPLEMENTARY INFORMATION

## 1. Site Details

| | | | |
|---|---|---|---|
| Site Name: | CNM013 | Site Address: | Maple House<br>Tottenham Court Road<br>Camden<br>London<br>W1T 7NF |
| National Grid Reference: | E929322<br>N 182222 | | |
| Site Ref: | CNM013/996369 | Site Type:[1] | Macro |

## 2. Pre Application Check List - Site Selection (for New Sites only)

| | | |
|---|---|---|
| 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:<br><br>No suitable alternatives were identified. Re-use of an existing telecommunications site is the preferred option. | | |

| | | |
|---|---|---|
| Were industry site databases checked for suitable sites by the operator: | **Yes** | No |
| If no explain why:<br><br>No suitable alternatives were identified. Re-use of an existing telecommunications site is the preferred option. | | |

**Annual Area Wide Information to local planning authority**

| | |
|---|---|
| Date of information submission to local planning authority | **Information not available** |
| Name of Contact: | |
| Summary of any issues raised: | |

**Pre-application consultation with local planning authority**

| | | |
|---|---|---|
| Date of written offer of pre-application consultation: | 26th May 2021 | |
| Was there pre-application contact: | **Yes** | No |
| Date of pre-application contact: | 26th May 2021 | |
| Name of contact: | The Chief Planning Officer | |

| |
|---|
| Summary of outcome/Main issues raised:<br><br>Pre-application consultation letter was sent to :-<br><br>The Chief Planning Officer<br><br>Response received from LPA on 27/05/2021 advising that a fee of £1050 is required to deal with pre-application consultation, over double the cost of dealing with a full planning application.<br><br>Accordingly, the applicant decided to move to submission once the opportunity for other consultees to respond had been given. |

**Ten Commitments Consultation**

| Rating of Site under Traffic Light Model: | **Amber** |
|---|---|
| The site was rated amber as it is an existing telecommunications site on an existing building, but is sited close to both Bloomsbury and Fitzroy Square Conservation Areas and adjacent to the University College London Hospital. Accordingly the following parties were consulted on 26th May 2021:-<br><br>Councillor Sabrina Francis<br>Councillor Adam Harrison<br>Councillor Rishi Madlani<br><br>No response received to date. | |

**School/College**

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|---|
| Location of site in relation to school/college *(include name of school/college):*<br><br>University College London lies some 180m to the East of the site and University College Hospital lies adjacent. |
| Outline of consultation carried out with school/college *(include evidence of consultation):*<br><br>Both the University and the Hospital were consulted on 26th May 2021. |
| Summary of outcome/Main issues raised:<br><br>No response has been received from either party to date. |

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

| | | |
|---|---|---|
| Will the structure be within 3km of an aerodrome or airfield? | | **No** |
| Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified? | | **No** |
| Details of response:<br><br>No response received to date. | | |

**Developer's Notice**

| | | |
|---|---|---|
| Copy of Developer's Notice enclosed? | | **NO** |
| Date served: | FULL PLANNING APPLICATION- Article 13 Notice served. | |

## 3.0 Proposed Development

**The proposed site:**

The application site is located on the eastern side of Tottenham Court Road, towards its junction with Euston Road. The rooftop of the subject property already accommodates telecommunications equipment, most of which cannot be seen from ground floor level. The building accommodates retail uses at ground floor with offices on the upper floors. The multi-story building is over 30m in height and lies adjacent to University College London Hospital. Approximately 60m to the North West of the building lies Warren Street Underground Station. The area is very busy in nature with retail and restaurant premises on both sides of the road at ground floor level and multiple elements of street furniture including street lamps, bus stops, street signage, traffic lights, dustbins, cabinets and other street paraphernalia. Directly opposite the host building lies Fitzroy Square Conservation Area, whilst the boundary of Bloomsbury Conservation Area lies to the South of the property and beyond the hospital to the East. There is no marked change in the street scene however as the main areas of interest lie to the West of the site and to the South and East.

There are a number of listed buildings nearby, namely 11 lampposts between Goodge Street and Warren Street and a number of properties along Grafton Way to the South West of the site. None of the listed lampposts are in close proximity of the rooftop to Maple House or indeed in the same visual context more generally and will therefore not be unduly harmed by the proposed development. Nos.37-45, 52-56 and 60-62 Grafton Way and attached railings are Grade II listed. Whilst No. 58 Grafton Way is Grade II* listed. All this properties are orientated to the South East and accordingly their primary facades are not seen in the same plane as the application site. Views from the rear of these properties are to the North West and South East. Nos. 63-68 Warren Street and attached railings some 135m to the West of the site are also Grade II listed but again due to their orientation facing due South and the height of the buildings close to the junction with Warren Street they do not have direct sight of the rooftop of Maple House. Accordingly the proposal will have no undue effect on the nearby listed buildings.

Many of the surrounding multi-storey buildings host rooftop telecommunications and other equipment and as such the subject property is not alone in this respect, making best use of

available space in order to avoid more equipment at ground level which will have more impact on the character and appearance of the area by introducing more street clutter.

**Planning History**

**2019/4815/P-** Relocation of 6 no. existing antennas and ancillary development thereto on the rooftop of Maple House.

**Prior Approval Given 05/11/2019**

**2018/1292/NEW-** NL - Upgrade works to the telecommunications installation.

**Withdrawn**

**2015/3889/P**- Installation of 6x air conditioning units on the roof (4th floor level) of Maple House as replacement of the existing 3x air conditioning units.

**Granted 05/02/2016**

**2011/4189/P-** Installation of telecommunication equipment cabinet, three antennas and a guard rail at roof level of offices (Class B1).

**Prior Approval Given 21/09/2011**

**2011/3630/P**- Replacement of x 3 2G O2 antennas and x 3 3G antennas with x 3 O2/Vodafone dual band antennas and x 3 3G O2/Vodafone triband antennas, including installation of x 4 radio equipment cabinets and ancillary equipment at roof level.

**Granted 16/09/2011**

**2006/3459/P-** Installation of 6 antennae, 4 microwave transmission dishes and 6 equipment cabinets on the roof of the building in office (Class B1) use.

**Granted 22/09/2006.**

**Current Telecommunications Use/ The Future**

Mobile operator networks have been under increased pressure, particularly recently, to provide up-to-date telecommunications functionality, as mobile phones and mobile broadband use have become increasingly essential to our daily lives.5G is the next generation of technology to enable increased connectivity with increased data speeds. The growth of digital connectivity over the last decade and the expectations of users have advanced at an unprecedented level. The NPPF recognises that "*Advanced high quality and reliable telecommunications infrastructure is essential to economic growth*…" as will be considered in more detail below.

The telecommunications strategy for the UK has changed significantly over recent years. The current proposal will provide positive benefits to the community which will far outweigh any perceived negative impacts. This is discussed in more detail below. MBNL have produced an advisory note entitled 5G and Future Technology- Delivering the UK's Telecoms Future and this is enclosed as part of the application.

EE is the network provider for the Emergency Services Network providing services which have become even more critical during the ongoing pandemic. The Emergency Services Network uses high speed mobile technology to allow for communication between the emergency services taking priority over all other network traffic, even at peak times in busy urban locations. The application site lies immediately adjacent to one of London's main hospitals and the proposed equipment is to enable enhanced connectivity for all.

| Enclose map showing the cell centre and adjoining cells: |
|---|
| **Information available on request.** |

| Type of Structure *(e.g. tower, mast, etc):* | |
|---|---|
| The installation of a 10m rooftop stub tower supporting 12 no. antennas installed on new support poles fixed to the new tower headframe, 3 no. 0.6m dishes and retention of 1 no. 0.3m dish, 4 no. cabinets and retention of 2 no. cabinets on a steel platform, the removal of redundant equipment and steelwork and development ancillary thereto. | |
| Overall Height: 41.89m | |
| Height of existing building *(where applicable):* | **N/A** |
| Equipment Housing: See drawings. | |
| Length: | |
| Width: | |
| Height: | |
| Materials *(as applicable):* | |
| Tower/mast etc – type of material and external colour: | **See drawings.** |
| Equipment housing – type of material and external colour: | **See drawings.** |

**Reasons for choice of design:**

The proposed development seeks to upgrade the existing telecommunications base station by removing existing MBNL equipment cabinets, antennas and associated equipment and steelwork and replacing it with up to date equipment which will enable the introduction of 5G technology to the area. The replacement equipment has been specifically designed for its rooftop location on a multi-storey building in Central London. The building has hosted telecommunications equipment for a considerable length of time and the current proposals seek to upgrade the site to allow for the introduction of 5G technologies to the area.

The proposed solution is a 10m lattice stub tower supporting 12 no. new antennas apertures and 3 no. 0.6m dishes, the retention of 1 no. 0.3m dish and 2 no. cabinets with associated equipment and development. New cabinets are proposed to be installed on a steelwork platform. Whilst the proposed stub tower is taller than the equipment currently on site it is well set back from the edge of the building such that it will not be unduly visible from ground level at close quarters. Whilst it will be visible from areas further to the North, it is contended that it

nevertheless, reflects an urban skyline, punctuated by high rise features. Indeed the BT Tower is visible in the same plane from the road junction to the north of the site and the London skyline is often punctuated by large cranes, which although temporary are still prevalent in the area.

The scale of the proposed replacement apparatus is the minimum capable of providing the technological improvements sought and satisfying ICNRP requirements. It should be noted that this installation will not have a significant visual impact as the top of the proposed antennas will be at a height of 41.89m above ground level and is set well back from of the main façade fronting onto Tottenham Court Road. This proposed replacement equipment will provide advanced high quality communications infrastructure essential for economic growth as sought by the NPPF. Furthermore the removal of the existing equipment to allow the installation of the proposed equipment provides a spatially sustainable solution to improving telecommunications technologies.

Whilst it is acknowledged that there is an increase in the scale of telecommunications development on the site, it should be noted that the new technologies will provide advanced high quality communications infrastructure essential for economic growth as sought by the NPPF, in a Central London location on a main road, close to transport hubs and adjacent to a hospital. Furthermore, existing equipment will be removed where not required to allow the proposed equipment to be located on or as close to the same location as possible**.**

## 4.0 Technical Information

| | | |
|---|---|---|
| International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)*<br><br>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.<br><br>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.<br><br>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 |

| | |
|---|---|
| Frequency | To be provided on request |
| Modulation characteristics[2] | To be provided on request |
| Power output (expressed in EIRP in dBW per carrier)<br><br>In order to minimise interference within its own network and with other radio networks, EE operates its network in such a way that radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.<br><br>As part of EE's network, the radio base station that is the subject of this application will be configured to operate in this way. | To be provided on request |
| Height of antenna (m above ground level) | 38.1m |

## 5.0 Technical Justification

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

**Information available upon request.**

**Background:**
As part of EE (UK) Ltd.'s and H3G (UK) Ltd.'s continued network improvement program they wish to upgrade the existing site to facilitate additional coverage and capacity requirements, incorporating new technologies. Section 10 of the NPPF sets out the Government's general overview regarding supporting high quality communications infrastructure, recognising that advanced, high quality communications infrastructure is essential for sustainable economic growth. In order to keep the number of base stations to a minimum, the use of existing sites is considered to provide the optimum solution and accordingly the proposed site upgrade should be viewed positively. As such, no alternative locations were sought in this instance.

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

Many other everyday items also use radio signals to send and receive information, such as television and radio broadcasting equipment and two-way radio

[2] The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase Modulation.
The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation.

communications. Base stations are connected to each other and telephone exchange buildings by cables or wireless technology such as microwave dishes, to create the 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. Each base station covers 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.

It is imperative that support is given to the introduction of new infrastructure to allow new technology which will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds. This will enable places to remain competitive and will support the Government’s ambition for the UK to become a world leader in telecommunications technologies and development. The site is located in an active location in the heart of Central London, adjacent to major transport routes, an underground station and a large hospital. Whilst it is acknowledged that there is a significant increase in the scale of telecommunications development on the site, it should be noted that the new technologies will provide advanced high quality communications infrastructure essential for economic growth as sought by the NPPF. Any perceived negative impacts will be far outweighed by the overall benefits of the scheme and the location of the apparatus on a building which already supports extensive telecommunications equipment will minimise its potential impact on the immediate environment.

All EE installations are designed to be fully compliant with the public exposure guidelines established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines have the support of UK Government, the European Union and they also have the formal backing of the World Health Organisation. A certificate of ICNIRP compliance will be included within the planning submission.

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**[3] | **Site Name and address** | **National Grid Reference** | **Reason for not choosing**[4] |
|---|---|---|---|

| If no alternative site options have been investigated, please explain why<br><br>**The site is an existing telecommunications site which is to be upgraded. Accordingly, alternative sites were not sought in this instance.** |
|---|

[3] *ETS - Existing Telecomm site, ES - Existing Structure, RT - Roof Top, GF - Greenfield*
[4] SP - Site Provider, RD - Redevelopment Not Possible, T - Technical Difficulties, P – Planning O – Other

**Additional relevant information**

**Planning Policy Assessment**

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with policies of the adopted Statutory Development Plan, unless material considerations indicate otherwise.

**National Planning Policy Framework (2019)**

The National Planning Policy Framework (NPPF) was published in February 2019 and supersedes previous versions of the document and national planning guidance contained in the various Planning Policy Guidance notes and Planning Policy Statements. The NPPF sets out the Government's economic, environmental and social planning policies and how these are to be applied in relation to all planning applications.

At the heart of the NPPF is a presumption in favour of sustainable development. Under Section 6 paragraph 80 the NPPF advises…." *Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development." In terms of supporting a prosperous rural economy paragraph 84…" The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."* The proposal seeks the upgrade of an existing telecommunications site, rather than utilising land which has not previously been developed. This approach provides a sustainable solution to the need to upgrade telecommunications services in the area which will benefit not only the local community, but also visitors to the area and potentially reducing the need to travel, an important consideration in this active urban location.

In section 10 of the new NPPF states *"Advanced, high quality and reliable communications infrastructure is essential to economic growth and social wellbeing".* It advises that *"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."* Paragraph 113 states" *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. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate."* The proposal allows for the re-use of an existing telecommunications site which will be upgraded to allow for the introduction of 5G technologies.

Paragraph 114 continues*" Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic*

*communications development and existing development. They should ensure that:*

*a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*

*b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services."*

The scheme will not cause any undue impact on the services outlined above and fully complies with ICNIRP standards. An ICNIRP certificate is enclosed with the application. The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for EE Ltd and H3G (UK) Ltd to enhance telecommunications services in the area to the benefit of the local community and visitors to the area. It will make effective use of the land as set out under Section 11 of the NPPF.

**Local Planning Policy**

The statutory development plan for the area is the London Plan (March 2021) and the Camden Local Plan 2017.

**The London Plan, March 2021**

Policy GG1 of the London Plan seeks to build strong and inclusive communities. By ensuring that the latest telecommunications technologies are available to all the economic security of the area will be secured and good and inclusive growth will be achieved.

**Policy *GG2 Making the best use of land***

*To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must:*

*A* *enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites*

*B* *prioritise sites which are well-connected by existing or planned public transport*

*C* *proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling*

*D* *applying a design–led approach to determine the optimum development capacity of sites*

*E* *understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character*

*F* *protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local*

*spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible*

G *plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth*

H *maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.*

The application site is the rooftop of a multi-storey mixed use building which already accommodates telecommunications equipment. The proposal seeks to replace the existing apparatus with up to date equipment which will allow for the introduction of 5G technologies to the area. Re-use of an existing site and an intensification of use represents the most sustainable option to providing 5G technologies in this instance. The host building is of no distinct architectural merit and does not lie within a conservation area. Whilst there are conservation areas in the site environs, the impact thereon is limited by the location of the site at roof level, the orientation of the building relative to its surroundings and the urban nature of the location.

The proposed stub tower is located away from the edge of the building and will only be visible from certain viewpoints. Whilst it will mainly be visible when approached from the North, it will be seen in the context of a plethora of vertical street furniture and the BT Tower, as well as many temporary cranes which regularly exist on the London skyline. The height of the stub tower is dictated by the need to satisfy ICNIRP requirements and will enable it to support the required antenna apertures and dishes capable of introducing 5G to the area. In all these circumstances the proposal will make the best use of land.

***GG5 Growing a good economy***

*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:*

A *promote the strength and potential of the wider city region*

B *seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London*

C *plan for sufficient employment and industrial space in the right locations to support economic development and regeneration*

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*

F *promote and support London's rich heritage and cultural assets, and its role as a 24-hour city*

G *make the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity*

H *recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success.*

The proposal to introduce 5G technologies will inevitably ensure the economic success of the area by allowing it to remain competitive, as encouraged by the NPPF highlighted above. The equipment will ensure that local residents, businesses and visitors to and through the area will have efficient, up to date, high speed technologies at their disposal supporting both economic and social activity.

***Policy D3 Optimising site capacity through the design-led approach***
***The design-led approach***

*A* *All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D……..*

*…D* *Development proposals should: Form and layout*

1) *enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions*
2) *encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area*
3) *be street-based with clearly defined public and private environments*
4) *facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users*

***Experience***

5) *achieve safe, secure and inclusive environments*
6) *provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest*
7) *deliver appropriate outlook, privacy and amenity*
8) *provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity*
9) *help prevent or mitigate the impacts of noise and poor air quality*
10) *achieve indoor and outdoor environments that are comfortable and inviting for people to use*

***Quality and character***

*11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character*

*12) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well*

*13) aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy*

*14) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.*

*E Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.*

The application site is the rooftop of a multi-storey mixed use building which already accommodates telecommunications equipment. Being a rooftop development, not all aspects of the above policy are directly relevant in this instance. However, in devising the scheme, due care and attention was given to ensure that the proposal would have the minimum impact on the character and appearance of the local area and the building itself possible.

The proposal seeks to replace the existing apparatus with up to date equipment which will allow for the introduction of 5G technologies to the area. Re-use of an existing site and an intensification of use represents the most sustainable option to providing 5G technologies in this instance. The host building is of no distinct architectural merit, is modern in form and does not lie within a conservation area. While there are conservation areas and listed buildings in the site environs, the impact thereon is limited by the location of the site at roof level, the orientation of the building relative to its surroundings and the urban nature of the location.

Immediately adjacent to the site lies University College Hospital, made up of a number of modern buildings including a high rise element to the North East of the site. The street pattern in the surrounding streets is close knit such that views towards the property are limited. Views from the nearby Conservation areas are also limited by the scale of the buildings surrounding the host property. Whilst the rooftop stub tower will be visible form a few locations to the North, these lie outside the nearby conservation areas and the BT Tower is also seem within the skyline. At street level, being an urban location there are multiple vertical elements in the street scene in the form of lighting columns, signage, traffic lights etc. When seem with this backdrop and the London skyline which always has temporary construction cranes on view, the proposed tower will not represent an incongruous form and it will not feel out of place.

The proposed equipment is located away from the front edge of the building and will only be visible from certain viewpoints. By installing the equipment on a modern multi-storey building of no distinct aesthetic merit, it avoids the need for additional base stations in the locality which are likely to have a far greater impact on the character and appearance of the area that the proposed rooftop equipment. In all these circumstances the proposal will make the best use of land and will not cause any undue harm to the character and appearance of the area or its environs.

***Policy D4 Delivering good design***
***Design analysis and development certainty***

*A* *Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design-led approach.*

*B* *Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.*

The application is accompanied by photomontages which demonstrate that the proposed development will be assimilated in the street scene without causing any undue harm to the character and appearance of the area or the locality, bearing in mind the building's location on a major transport route within Central London.

***Policy HC1 Heritage conservation and growth***

*…..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…….*

The application site is not a listed building nor does it lie within a conservation area. However, the site lies adjacent to two conservation areas as highlighted above. There are also a limited number of listed buildings nearby on Grafton Way and some listed lampposts between Goodge Street and Warren Street. The buildings directly opposite the site are significantly lower in scale than the subject property and in view of the fact that the proposed mast is well set back from the frontage of Maple House it is unlikely that the proposed stub tower will be visible, except perhaps from the uppermost storeys if at all. Views from surrounding properties would be at an oblique angle only looking upwards also. Buildings to the South and East of the subject property form part of University College London Hospital. Parts

of the main hospital and the newer multi-storey element lie outside the Bloomsbury Conservation Area. The university buildings lie further to the East and South East but are shielded from view by the intervening properties. The multi-storey nature of the buildings within the area and narrower width of the roads surrounding Tottenham Court Road, other than Euston Road, help to screen the proposal from view from these more sensitive locations.

Whilst the proposed rooftop stub tower will be visible from within the Fitzroy Square Conservation Area towards the end of Warren Street it will be seen in the context of an very active street scene, with abundant signage and street furniture which distract the eye such that it will not cause any undue to harm to the setting overall. The listed properties along Grafton Way are all orientated south eastwards such that they are not seen in the same plane as the proposed rooftop equipment on maple house. As such the historic character and special architectural appearance of these properties will be maintained. The listed lampposts between Warren Street and Goodge Street are located at street level and will not be seen in the same context as the proposed rooftop development and as such their general setting will be maintained

Bearing in mind the fact that the host building is of no aesthetic merit and is surrounded by more sensitive areas it seems logical to allow additional telecommunications apparatus to be located on the rooftop which has historically been used for telecommunications apparatus. This would avoid the need for additional base station to be established in the area which may have far more impact on the nearby historic assets than the proposal. The proposed apparatus is sympathetic to the host building and the locality more generally and will ensure that no undue harm will be caused to the historic or architectural interest of nearby listed buildings and conservation areas or indeed their setting.

The proposed equipment is to be set back from the main frontage of the building and due to its rooftop location and orientation will not be seen in the same plane as the nearby listed buildings. Views of the proposed equipment from the surrounding area are likely to be limited due to the scale of the host building, its orientation and the surrounding street pattern. Any views of the equipment that there may be, will be limited as highlighted above. In all these circumstances it is contended that the aims and objectives of Policy HC1 will be adhered to.

***Policy SI 6 Digital connectivity infrastructure***

*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.*

B *Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.*

The proposed development entirely accords with the aims and objectives of the above policy by updating the technologies available to local residents, businesses and visitors to and through the area. The site is an existing rooftop already accommodating telecommunications apparatus and the proposed equipment will allow for the introduction of 5G technologies, whilst at the same time respecting the built form of the host building and its setting close to listed buildings and adjacent to two conservation areas. The equipment is well set back from the building edge to limit its view from ground level. Furthermore, it is of simple form and the minimum height capable of providing the required services whilst at the same time satisfying ICNIRP requirements. The improvement in the services available and connectivity more generally will enable to area to remain competitive.

The proposed equipment is the minimum capable of providing the technological improvements sought. It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than is possible using the existing technology. This will support the Government's ambition for the UK to become a world leader in 5G. The 5G network is to be the fastest service that operators can provide. The new technology will enable easy and rapid access to information. The services provided by the rooftop equipment will benefit the local community, businesses and visitors alike.

**The Camden Local Plan 2017**

***"Policy G1 Delivery and location of growth***

*The Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.*

***Delivery of growth***

*The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by:*

*a. supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;*

*b. resisting development that makes inefficient use of Camden's limited land;*

*c. expecting the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible; and*

*d. supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.*

*Growth in Camden will be expected to help contribute towards achieving the strategic objectives of the Local Plan and help deliver the Council's priorities set out in supporting text below……*

***……Delivering growth***

***Making the most of our limited land***

*2.7 We will promote the most efficient use of Camden's land and buildings while also seeking to improve the quality of our environment, protect the amenity of occupiers and neighbours and meet its other planning objectives. It is important that development delivers not only homes, but also employment space together with the services and facilities that are needed to maintain and create healthy and sustainable communities where nobody gets left behind and everyone has a chance to succeed….."*

The application site is the rooftop of a multi-storey mixed use building on a major transport thoroughfare, which currently accommodates telecommunications apparatus. The proposal seeks to upgrade the existing apparatus to allow for the introduction of 5G technologies to the area. The most up to date and highest quality equipment is proposed which will enable the rooftop to be used in the most efficient manner. The proposed mast will be set back from the edge of the building and will support new antennas, dishes, associated equipment cabinets and ancillary equipment. Whilst the proposed mast may be visible from certain viewpoints further away from the building, it will not look out of place in this active urban location. The mast may be visible from within the Fitzroy Square Conservation Area at the end of Warren Street, but in view of the plethora of street clutter at this juncture and the scale of the surrounding buildings it is considered that the proposed stub tower will not cause any undue harm to the street scene. Due to the scale of the buildings within the Bloomsbury Conservation Area and the siting of the proposed stub tower on the northern section of Maple House away from the building edge, the equipment will not be visible from ground level. The setting of the nearby conservation areas and amenities of nearby occupiers will therefore not be unduly harmed.

Policy E1 Economic Development under section h), draws reference to the need to ensure the provision of high speed digital infrastructure in all employment developments.

***"Digital infrastructure***

*5.10 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*."

Mobile operator networks have been under increased pressure, particularly recently, to provide up-to-date telecommunications functionality, as mobile phones and mobile broadband use have become increasingly essential to our daily lives.5G is the next generation of technology to enable increased connectivity with increased data speeds. The growth of digital connectivity over the last decade and the expectations of users have advanced at an unprecedented level. The proposal seeks to upgrade the existing telecommunications equipment on the rooftop of an office building with retail uses at ground floor level, to provide advanced high quality communications infrastructure essential for economic growth. The proposal therefore accords with the aims and objectives of Policy E1.

***"Policy A1 Managing the impact of development***

*The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.*

*We will:*

*a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;*

*b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;*

*c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and*

*d. require mitigation measures where necessary. The factors we will consider include:*

*e. visual privacy, outlook;*

*f. sunlight, daylight and overshadowing;*

*g. artificial lighting levels;*

*h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;*

*i. impacts of the construction phase, including the use of Construction Management Plans;*

*j. noise and vibration levels;*

*k. odour, fumes and dust;*

*l. microclimate;*

*m. contaminated land; and*

*n. impact upon water and wastewater infrastructure."*

The application site lies on the rooftop of a multi-story building in Central London on Tottenham Court Road close to its junction with Euston Road. Maple House lies adjacent to University College London Hospital and close to Warren Street underground station. It lies adjacent to but outside two conservation areas and close to a number of listed buildings. However, due to the orientation of the host property, the rooftop location of the site and the nature of the surrounding uses it is contended that the proposal will have limited impact on the surrounding development and the amenities of nearby occupiers will remain unharmed. Whilst the proposed stub tower might be visible from views further away to the north of the site it will nevertheless be seen in the context of the abundant street furniture and surrounding multi-storey buildings with the BT tower dominating the skyline. In all these circumstances the aims and objectives of policy A1 will be adhered to and the amenities of nearby occupiers will not be unduly harmed.

***"Policy D1 Design***

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

*a. respects local context and character;*

*b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*

*c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*

*d. is of sustainable and durable construction and adaptable to different activities and land uses;*

*e. comprises details and materials that are of high quality and complement the local character;*

*f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*

*g. is inclusive and accessible for all;*

*h. promotes health;*

*i. is secure and designed to minimise crime and antisocial behaviour;*

*j. responds to natural features and preserves gardens and other open space;*

*k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting*

*of trees and other soft landscaping,*

*l. incorporates outdoor amenity space;*

*m. preserves strategic and local views;*

*n. for housing, provides a high standard of accommodation; and*

*o. 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.*

***Tall buildings***

*All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to:*

*p. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;*

*q. the historic context of the building's surroundings;*

*r. the relationship between the building and hills and views;*

*s. the degree to which the building overshadows public spaces, especially open spaces and watercourses; and*

*t. the contribution a building makes to pedestrian permeability and improved public accessibility. In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability.*

***Public art***

*The Council will only permit development for artworks, statues or memorials where they protect and enhance the local character and historic environment and contribute to a harmonious and balanced landscape design.*

***Excellence in design***

*The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under Policy G1 Delivery and location of growth will be provided through high quality contextual design."*

***Local context and character***

*7.2 The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect*

*developments to consider:*

*• character, setting, context and the form and scale of neighbouring buildings;*

*• the character and proportions of the existing building, where alterations and extensions are proposed;*

*• the prevailing pattern, density and scale of surrounding development;*

*• the impact on existing rhythms, symmetries and uniformities in the townscape;*

*• the composition of elevations;*

*• the suitability of the proposed design to its intended use;*

*• inclusive design and accessibility;*

*• its contribution to public realm and its impact on views and vistas; and*

*• the wider historic environment and buildings, spaces and features of local historic value…."*

***"Building services equipment***

*7.34 Building services equipment, such as air cooling, heating, ventilation and extraction systems, lift and mechanical equipment, as well as fire escapes, ancillary plant and ducting should be contained within the envelope of a building or be located in a visually inconspicuous position."*

The proposed equipment is to be installed on a rooftop that has accommodated telecommunications equipment for a considerable length of time. Telecommunications apparatus is location dependant in order to function and the proposed design is dictated by the function that it performs. A stub tower is proposed to support 6 no. new antenna apertures and 4 no. 0.6m dishes which will allow for the introduction of 5G technologies to the area. The stub tower is the minimum height possible in order to accommodate the required antennas and dishes whilst at the same time complying with ICNIRP standards. Any reduction in height would lead to non-compliance with ICNIRP.

The proposed stub tower has been well set back from the edge of the building to reduce visibility of the equipment from ground floor level and ensure that the equipment is placed in a location that is within the building envelope and is as visually inconspicuous as it can be. The design is simple in form and relatively compact in nature.

Whilst areas to the South, South East and West of the building lie within the Bloomsbury and Fitzroy Square Conservation Area, due to the elevated nature of the site, the position on the building and the scale of the surrounding buildings, it is contended that the proposal will not unduly harm the setting of these surrounding conservation areas. The stub tower will be visible from the end of Warren Street, adjacent to the underground station, but being in such a busy location with a plethora of street furniture and abundant signage it will have minimal impact if any

on the character and appearance of the street scene. The mast will also be visible from around the junction on the northern side of Euston Road. However, from this viewpoint the BT Tower dominates the skyline and at street level there is an abundance of street furniture in the form of traffic lights, lighting columns such that the character and appearance of the area will be maintained, rather than harmed. Approaching from the South, close to the junction with Maple Street there may also be limited views of the proposed stub tower. However, views from this angle are dominated by Euston Tower/Regent's Place and once again there is abundant street furniture at street level which diverts the eye. It is also important to note that the London skyline is often peppered with cranes and whilst they are only a temporary feature they have a similar impact on the appearance of the area as roof level equipment such as that proposed in this instance.

No strategic or important local views will be harmed. The scale of buildings surrounding the site limits views of the proposed equipment principally to those identified above. Any other views such as when travelling eastwards along Euston Road near the junction with Tottenham Court Road will be at an oblique angle only and not generally within the eye line of the direction of travel. Other aspects of Policy D1 are not directly relevant in this instance.

***"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**

*Designed 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:*

*a. the nature of the heritage asset prevents all reasonable uses of the site;*

*b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*

*c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*

*d. 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:*

*e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*

*f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*

*g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*

*h. 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.*

***Listed Buildings***

*Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:*

*i. resist the total or substantial demolition of a listed building;*

*j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and*

*k. resist development that would cause harm to significance of a listed building through an effect on its setting.*

***Archaeology***

*The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.*

***Other heritage assets and non-designated heritage assets***

*The Council will seek to protect other heritage assets including nondesignated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.*

*The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset."*

The application site lies adjacent to but outside two conservation areas as

highlighted above. There are also a limited number of listed buildings nearby on Grafton Way and some listed lampposts between Goodge Street and Warren Street. The buildings directly opposite the site are significantly lower in scale than the subject property and in view of the fact that the proposed mast is well set back from the frontage of Maple House it is unlikely that the proposed stub tower will be visible, except perhaps from the uppermost storeys if at all. Views from surrounding properties would be at an oblique angle only looking upwards also. Buildings to the South and East of the subject property form part of University College London Hospital. Parts of the main hospital and the newer multi-storey element lie outside the Bloomsbury Conservation Area. The university buildings lie further to the East and South East but are shielded from view by the intervening properties. The multi-storey nature of the buildings within the area and narrower width of the roads surrounding Tottenham Court Road, other than Euston Road, help to screen the proposal from view from these more sensitive locations.

Whilst the proposed rooftop stub tower will be visible from within the Fitzroy Square Conservation Area towards the end of Warren Street it will be seen in the context of an very active street scene, with abundant signage and street furniture which distract the eye such that it will not cause any undue to harm to the setting overall. The listed properties along Grafton Way are all orientated south eastwards such that they are not seen in the same plane as the proposed rooftop equipment on maple house. As such the historic character and special architectural appearance of these properties will be maintained. The listed lampposts between Warren Street and Goodge Street are located at street level and will not be seen in the same context as the proposed rooftop development and as such their general setting will be maintained. As such there will be no harm to any of the above listed buildings through an effect on their setting. In all these circumstances it is contended that the aims and objectives of Policy D2 are adhered to.

***"Policy TC4 Town centre uses***

*The Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours.*

*We will consider:*

*a. the effect of development on shopping provision and the character of the centre in which it is located;*

*b. the cumulative impact of food, drink and entertainment uses, taking into account the number and distribution of existing uses and nonimplemented planning permissions and any record of harm caused by such uses;*

*c. the Council's expectations for the mix and balance of uses within frontages for each centre are set out in Appendix 4;*

*d. the individual planning objectives for each centre, as set out in the supplementary planning document Camden Planning Guidance on town centres and retail;*

*e. impacts on small and independent shops and impacts on markets;*

*f. the health impacts of development;*

*g. the impact of the development on nearby residential uses and amenity and any prejudice to future residential development;*

*h. parking, stopping and servicing and the effect of the development on ease of movement on the footpath;*

*i. noise and vibration generated either inside or outside of the site;*

*j. fumes likely to be generated and the potential for effective and unobtrusive ventilation; and*

*k. the potential for crime and antisocial behaviour, including littering.*

*To manage potential harm to amenity or the local area, we will, in appropriate cases, use planning conditions and obligations to address the following issues:*

*l. hours of operation;*

*m. noise/vibration, fumes and the siting of plant and machinery;*

*n. the storage and disposal of refuse and customer litter;*

*o. tables and chairs outside of premises;*

*p. community safety;*

*q. the expansion of the customer area into ancillary areas such as basements;*

*r. the ability to change the use of premises from one food and drink use or one entertainment use to another (within Use Classes A3, A4, A5 and D2); and Camden Local Plan | Town centres and shops 289*

*s. the use of local management agreements to ensure that the vicinity of premises are managed responsibly to minimise impact on the surrounding area.*

*Contributions to schemes to manage the off-site effects of a development, including for town centre management, will be sought in appropriate cases."*

The proposed development which seeks to upgrade an existing telecommunications site aims to support the uses carried out in the surrounding area. EE (UK) ltd is the nominated network provider for the Emergency Services Network, critical to enabling the emergency services being able to respond in a co-ordinated manner in this Central London location, adjacent to a major hospital. The site also lies on a major transport thoroughfare, close to major London railway stations and opposite Warren Street tube station. The site is therefore in a highly active location surrounded by mixed uses and the building itself accommodates retail uses at ground floor level with offices above. There is therefore a need to ensure that the area is served by the most up to date technologies available and the use of an existing telecommunications site represents the most sustainable approach available, as supported by the NPPF. The proposal will allow for the introduction of 5G technologies to the area which will help to secure the economic future of the

locality. In all these circumstances the proposal will not cause any undue harm to the character of the area and will enhance its function, vitality and viability without causing harm to the amenity of any neighbouring properties. As such it will support the aims and objectives of Policy TC4.

**CONCLUSION**

There is a requirement for EE and H3G to provide advanced telecommunications technologies to the area around Tottenham Court Road. Network planners have identified a need for an upgraded installation and the proposed development will address this identified need and continued customer demands.

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This application explains the technical need for the installation to provide improved customer service.

In terms of siting and design, it is considered that the proposal responds positively to the character and appearance of the local environment, as far as it is able to and will not have an unacceptable adverse impact on the application site or the surrounding area more generally. More sensitive sites in the surrounding locality have been specifically avoided. The design is of a high standard, and will not detract significantly from the existing visual and environmental character of the area. The benefits to those employed on site, within the neighbouring hospital and university and visitors to and through the area far outweigh any potential perceived negative impacts. In all these circumstances it is concluded that there no policy or other objections that would warrant the refusal of planning permission and accordingly permission should be granted for the proposed development.

**Contact Details**


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|---|---|---|---|
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| | | | |
|---|---|---|---|
| **Signed** | **Susan Griffiths** | **Date** | **9th June 2021** |
| **Position** | **Head of Planning** | **Company** | **For and on behalf MBNL, EE (UK) Ltd & H3G (UK) Ltd** |