SUPPLEMENTARY INFORMATION

1. Site Details

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

2. Pre-Application Check List

Site Selection (for New Sites only)
(Would not generally apply to upgrades/alterations to existing sites)

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

Site specific pre-application consultation with local planning authority

Was there pre-application contact:	**Yes**	No
Date of pre-application contact:	8 April 2021	
Name of contact:	Matthew Dempsey	
Summary of outcome/Main issues raised: Following the refusal of the previous application (application reference 2020/2469/P), drawings were revised and these were sent to Matthew Dempsey for informal comment. The following comments were made regarding the merits of the proposal: *"Having taken a quick look, this approach would appear to be an improvement on the refused scheme.* *I would suggest providing a view from Bedford Square, as per the previous application, in order to show the impact on the main cause for concern, i.e.) the Listed Buildings around Bedford Square. But also; to provide elevations from around the building to show the proposed installations from each side (close up views may be helpful to enable us to understand where everything is proposed)."* In response – revised photomontages will be submitted, including a view from Bedford Square, to illustrate the impact of the development. In addition, an enlarged elevation drawing has been included with the application documents.		

[1] Macro or Micro

Community Consultation

Rating of Site under Traffic Light Model If Required:	Red	**Amber**	Green
Outline Consultation carried out: Pre-application consultation has not been undertaken for this revised submission. For the original application, pre-application consultation letters were sent by email on 2 December 2019 to the Bloomsbury Ward Councillors – Councillors Francis, Harrison and Madlani.			
Summary of outcome/Main issues raised: No comments were received.			

School/College

Location of site in relation to school/college *(include name of school/college):* The site is close to the following establishments: • Ecole Jeannine Manuel - 43-45 Bedford Square, London, WC1B 3DN • YMCA Club - 112 Great Russell Street, London, WC1B 3NQ
Outline of consultation carried out with school/college *(include evidence of consultation):* Pre-application consultation has not been undertaken for this revised submission. For the original application, correspondence was sent to the establishments on 2 December 2019.
Summary of outcome/Main issues raised: No responses were received.

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

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

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	No
Date served:	16 September 2021	

3. Proposed Development

The proposed site:

EE and H3G previously had equipment located on Castlewood House on New Oxford Street (within the Westminster City Council area). The operators were served with a Notice to Quit the site as the building is being redeveloped, and the site has now been removed. Therefore, a new site is required in the area to provide replacement coverage for both EE and H3G.

A previous proposal, on 14-28 Oxford Street (again within Westminster), to replace coverage was refused due to its perceived impact on heritage assets (part of the building is Grade II listed and is within a conservation area) – application refs. 19/05743/FULL and 19/05744/LBC.

The application site is a substantial building. Central Cross has its main frontage onto Tottenham Court Road to the east, and is bounded to the north by Stephen Street. The building has retail uses at ground level, and is commercial in use above. There are a number of conservation areas around the site (Hanway to the south in Westminster, Charlotte Street to the north and Bloomsbury to the east). The application site, however, is not located within a conservation area. There are listed buildings in the surrounding area, however none close adjacent to or opposite the site.

The proposal involves the installation of 12 no. antenna apertures on the roof of the building, four to the north, four to the west and the remaining 4 to the south. Equipment cabinets are proposed on the western side of the roof. The development would provide replacement and improved connectivity and network enhancement to the surrounding area for both EE and H3G, including new 5G coverage to the surrounding area. The photograph below shows the building from Stephen Street:

This is the third submission for an installation on the roof of the building:

The first submission was a Prior Approval application (application reference 2019/6259/P). This proposed antennas on steel frames on the top of the plant room. This was refused due to harm to the character and appearance of the host building and the surrounding conservation areas.

The second application was a planning application which included a polycarbonate screen around the equipment (application reference 2020/2469/P). Whilst the screens meant the equipment was not visible, the screens needed to be large and these were not considered acceptable, in particular in respect of its impact on listed buildings in Bedford Square to the north.

This revised scheme relocates the antennas against the plant room to reduce their visibility.

Type of Structure *(e.g. tower, mast, etc):*	*Rooftop*
Description: The installation of 12 no. antenna apertures, 4 no. transmission dishes and 7 no. equipment cabinets on the roof of the building and development ancillary thereto.	
Overall Height:	58.18 metres to top of antennas
Height of existing building *(where applicable):*	58.19 metres (top of parapet)
Proposed Equipment Housings:	
Link AC Cabinet:	1.2m (width) x 0.6m (depth) x 1.6m (height)
D-AIRO Cabinet:	1.5m x 0.6m x 2.1m
Furo Cabinet:	0.75m x 0.6m x 2.1m
H3G BBU Cabinet:	0.77m x 0.77m x 2.1m
Equipment cabinets:	3 x 0.77m x 0.77m x 2.2m
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.

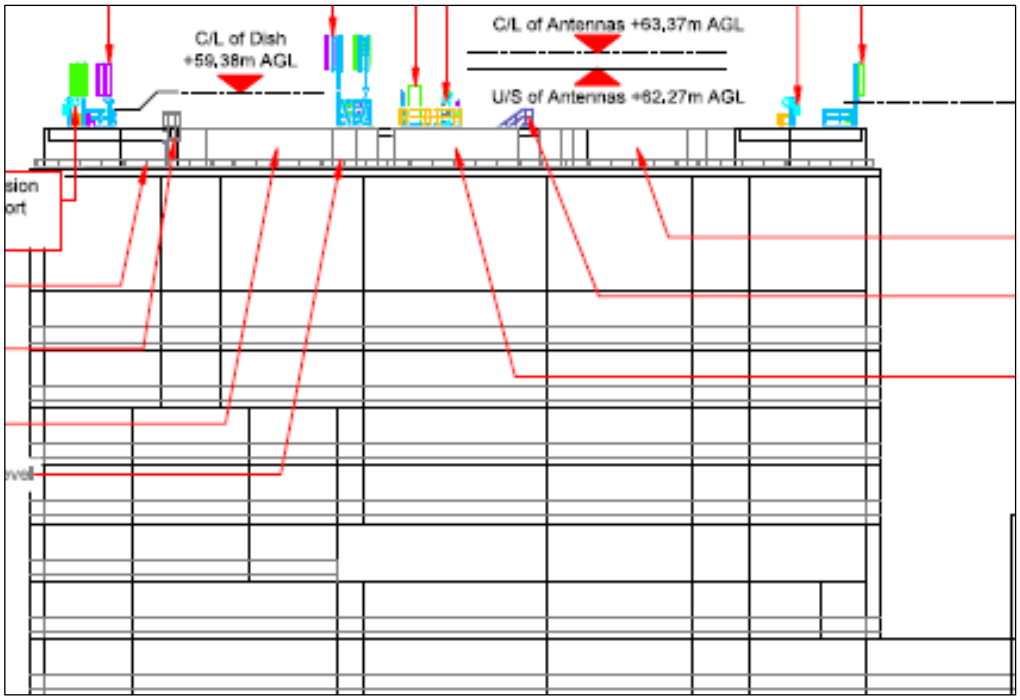
Reasons for choice of design:

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.

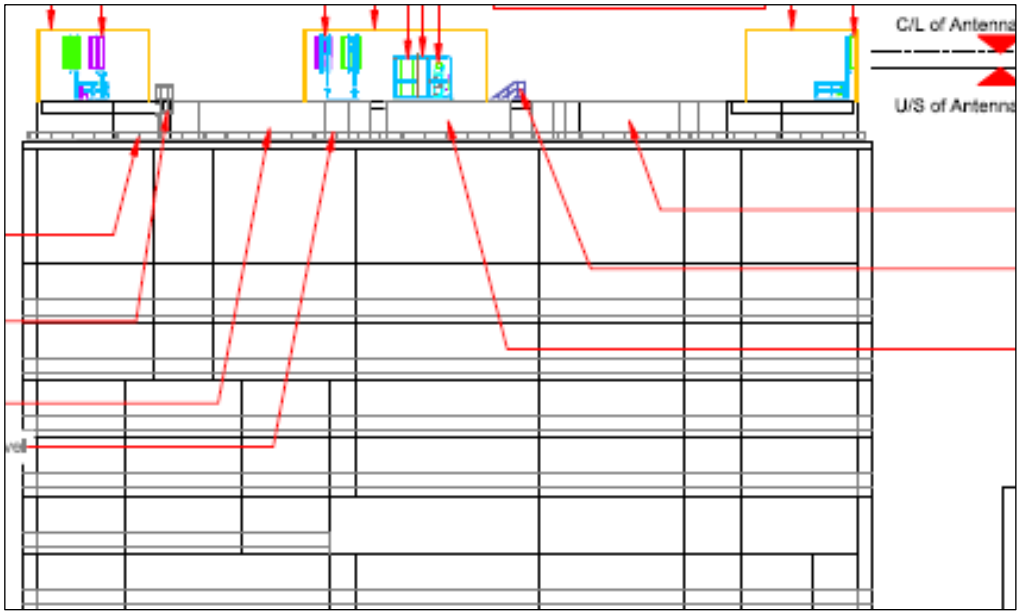
There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along 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.

As noted above this is the third application proposing telecommunications equipment on the roof of the building. The first considered the building was tall and substantial enough to site a standard design with antennas located on supporting structures on the highest part of the building. After this initial proposal was refused, a revised scheme utilising shrouding was proposed to screen the equipment. As the antennas are relatively large (this is because they provide coverage to two operators and for a range of

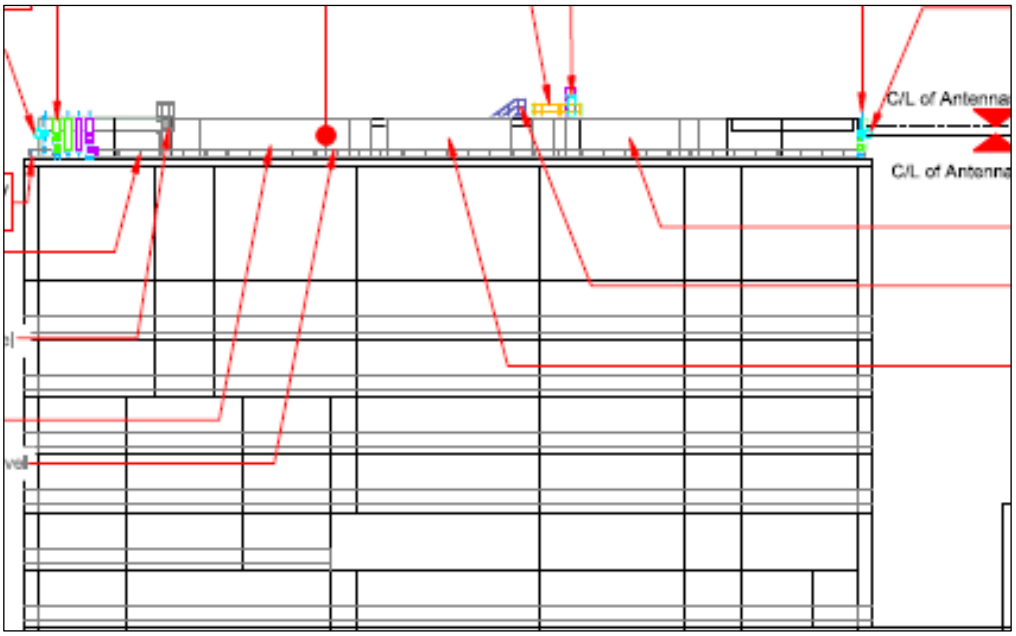
technologies), this resulted in shrouds being relatively substantial. It was considered that this was a suitable design solution, due to the height and bulk of the building, however the LPA did not agree. This new scheme reduces the height of the antennas so that they don't protrude above the upper roof level. This significantly reduces the impact of the proposed equipment. For comparison, extracts of the elevation drawings are set out below:



First application (2019/6259/P) – standard design with antennas on the upper roof level.



Second application (2020/2469/P) – antennas in the same locations, however with a shroud around the equipment.



Current proposal – antennas relocated to support poles to remove the antennas from the higher roof level, therefore substantially reducing the overall impact of the development.

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. The latest amendments would significantly reduce the visibility and overall impact of the development.

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.	**Yes**	No

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.		

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, enhanced connectivity and network coverage to EE and H3G in the area, including providing new 5G coverage.

The first generation of services provided voice calls, the second generation (2G) allowed basic data such as texting and the third generation (3G) offered internet access and the development of apps. Since then, the smart phone has developed further and the fourth generation has brought video and much faster data speeds allowing the integration of the smart phone into wider use. The next generation of mobile telephony is 5G which brings greatly increasing data speeds. The advantages this presents range from near-instant downloads of HD films to connected cars, smart medical devices and smart cities.

5G is the next generation of mobile internet connectivity, offering faster speeds and more reliable connections on smartphones and other devices than ever before. Compared to even the most recent and efficient generation of mobile network, 4G, 5G is set to be far faster and more reliable, with even greater capacity and lower response times.

As is often the case with the introduction of new mobile technologies, we are aware that there has been a lot of coverage on the internet and in the media with regard to the possible health implications of 5G rollout in the UK. Exposure to non-ionising radiation is regulated and limited and all UK base stations are required to comply with health and safety guidelines set by the International Commission on Non-Ionisation Radiation ('ICNIRP'). This is an independent body of scientists that was set up to provide advice and guidance on the health and environmental effects of non-ionizing radiation which is used in mobile telecommunications. The guidelines set by the commission are in place to protect all members of the public, of all ages and in all states of health and wherever they might be in relation to a base station for 24 hours a day. They are backed by the World Health Organisation, the EU and the UK Government.

The ICNIRP reviewed and updated their guidelines in 2020. The new guidelines provide better and more detailed exposure guidance in particular for the higher frequency range, above 6 GHz, which is of importance to 5G and future technologies using these higher frequencies. The ICNIRP chairman, Dr Eric van Rongen, has advised that "the most important thing for people to remember is that 5G technologies will not be able to cause harm when these new guidelines are adhered to". We confirm that they are adhered to by H3G as well as the UKs other mobile operators.

The Director of Mobile UK has also commented on the updated ICNIRP guidelines and stated that "*The consistent conclusion of public health agencies and expert groups is that compliance with the international*

guidelines is protective for all persons (including children) against all established health risks." (our emphasis).

Public Health England (PHE) commented in 2019 that "*It is possible that there may be a small increase in overall exposure to radio waves when 5G is added to an existing network or in a new area. However, the overall exposure is expected to remain low relative to guidelines and, as such, there should be no consequences for public health*" https://www.gov.uk/government/publications/5g-technologies-radio-waves-and health/5gtechnologies-radio-waves-and-health

There has been a significant amount of other independent, peer reviewed, scientific research by recognised bodies that has been carried out into the technology used in mobile telecommunications over several decades. The consensus of the international scientific community is that there has been no convincing evidence to date that RF field exposure below the internationally agreed guideline levels applied in the UK (ICNIRP) causes negative health effects in adults or children. This includes recent reviews of 5G technology.

In January 2019 the Finnish Radiation and Nuclear Safety Authority (STUK) concluded that "*In the light of current information, exposure to radio frequency radiation from base stations will not rise to a significant level with the introduction of the 5G network. From the point of view of exposure to radio frequency radiation, the new base stations do not differ significantly from the base stations of existing mobile communication technologies (2G, 3G, 4G*)" https://www.stuk.fi/aiheet/matkapuhelimet-jatukiasemat/matkapuhelinverkko/5g-verkon-sateilyturvallisuus

Similarly, and also in January 2019, the Norwegian Radiation and Nuclear Safety Authority (DSA), commented that "*The overall research shows that the radiation from wireless technology is not hazardous to health, as long as the levels are below the recommended limit values. This is the prevailing view among researchers in many countries today, and it is supported by the EU Scientific Committee. We have used cell phones and radio* 5G and transmitters *for decades and much research has been done on how this affects our health. Risk factors of importance to public health have not been found. With the knowledge we have today, there is no need to worry that 5G is hazardous to health*." https://www.dsa.no/temaartikler/94565/5g-teknologi-og-straaling.

All EE and H3G base stations are designed to be fully compliant with ICNIRP guidelines, and a certificate of compliance is included with the application. In addition, a document entitled 'Mobile Health Fact Sheet' is included with the application documents. This provides a simple explanation of 5G and the equipment behind it, including the antennae and the masts, in particular in relation to health issues. In addition, further details of the new 5G technology are included within this application in the form of the '5G and Future Technology' document.

5. Site Selection Process

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

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

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

N/A

Additional relevant information:

Siting and Appearance

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

Although the previous scheme to install equipment on the building was refused, it was considered suitable in terms of its impact on both the host building and the surrounding area. The host building is a tall and substantial building and it was considered that the limited impact on the building would be outweighed by the substantial benefits of the development. The LPA, in determining the previous application took an alternative view – the decision notice stated:

> *"The proposed antenna apertures, equipment cabinets and GRP screens surround by reason of their number scale, massing, design, siting, and prominence, would result in visual clutter which would cause harm to the character and appearance of the host property, the setting of neighbouring Grade I and II* listed buildings fronting Bedford Square, and local views from within the adjacent Hanway Street and Bloomsbury Conservation Areas contrary to policy D1 (Design) and D2 (Heritage) of the Camden Local Plan and National Planning Policy Framework 2019."*

This further revised proposal addresses the concerns raised. Any site in the area to provide replacement coverage is going to have an impact on heritage assets. It is noted that a site outside of a conservation area was sought and found in an attempt to limit the impact on heritage assets, and then to come up with a scheme where the benefits of the proposal outweighed the harm. The map extract below (taken from the Council's conservation area maps) highlights the difficulty of site searching, in terms of impact on heritage assets. Although not in a conservation area, the site is close to designated assets.

The changes to the scheme aim to address the concerns by dropping the height of the antennas so that they would not protrude above the upper roof level. Photomontages are being prepared (and these will be forwarded under separate cover) to confirm the impact of the proposed development. This solution allows for replacement and enhanced coverage to be provided whilst preserving heritage assets.

The revisions to the scheme further weigh the benefits of the scheme against the limited harm to heritage assets. 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.

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 (2021) (NPPF)

The National Planning Policy Framework came into force in 2012. The guidance has most recently been revised in July 2021. 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 replacement 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 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 114 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 115 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 substantial rooftop site to provide replacement and enhanced coverage for two Operators, the proposal is in line with the above policy.

It should be noted that paragraph 118 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 189 sets out that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 202 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 within a car parking area and close to a number of trees, 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: The Spatial Development strategy for Greater London 2021;
- The Camden Local Plan (2017) and the Site Allocations Plan (2013).

<u>The London Plan</u>

This revised guidance emphasises the importance of digital infrastructure. Policy SI 6 deals specifically with Digital connectivity infrastructure. The general aim of the policy is for new development to meet demand for connectivity. This is expanded upon in the supporting text for the policy. Paragraph 9.6.1 states: "*The **provision of digital infrastructure** is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance. London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration."*

Of particular relevance to the development is paragraph 9.6.6 which states: *"Access for network operators to rooftops of new developments should be supported where an improvement to the mobile connectivity of the area can be identified."*

The revised guidance is clearly supportive of the proposal and the role that it will perform allowing EE and H3G to provide replacement and enhanced coverage to the surrounding area.

Local Plan

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

It is considered the proposal complies with both policies. The scheme has been specifically designed for this location. The host building is substantial and the proposal would have a minimal impact on the application site and the surrounding area. Although visible from certain viewpoints any impact would be minimal, as the building is tall and the roof where the equipment is proposed to be located is set well-back from the main Tottenham Court Road frontage. The building is not located within any designated area, however is close to a number of conservation areas, and there are a number of listed buildings in the surrounding area. The sympathetic design ensures there would be no harm to heritage assets. This revision to the scheme ensures impact is minimised to an acceptable level. Impact on heritage assets would be less than substantial, and this harm would be outweighed by the substantial 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 latest design changes bring down the height of the antennas, reducing the overall impact of the scheme.

The proposal is fully compliant with ICNIRP guidelines.

Confirmation that submitted drawings have been checked for accuracy

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Signed:	Chris Andrews	Date:	16/09/2021
Position:	Planner	Company (Agent): (on behalf of EE Ltd & H3G Ltd)	Waldon Telecom (Agent) Phoenix House Pyrford Road West Byfleet Surrey KT14 6RA