SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	St Richards House	Site Address:	St Richards House, 110 Eversholt Street, London, NW1 1BS
National Grid Reference:	E: 529526, N: 182947)		
Site Ref Number:	96883	Site Type:[1]	Macro

2. Pre Application Check List

Site Selection (for New Sites only)
(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	**No**
If no explain why: Other sources checked.		
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
Date of pre-application contact:	10/02/2022
Name of contact:	The Chief Planning Officer
Summary of outcome/Main issues raised: Pre application consultation was sent to the London Borough of Camden on 10th February 2022. A response was received from the LPA requesting a fee of £1050 for formal pre application advice. It has been decided to proceed with an application as it is considered that the best design has been put forward in order to achieve the technical requirements of the site, and due to the technical constraints that affect the design there is limited scope to alter the appearance of the site to a significant degree.	

Community Consultation

[1] Macro or Micro

Rating of Site under Traffic Light Model:	Red	Amber	**Green**
Outline of consultation carried out: The proposal was rated Green in accordance with the traffic light consultation model in the Code of Best Practice on Mobile Network Development (published 2016). The pre-application consultation plan adhered to this best practice guidance. Pre-application consultation was undertaken with the councillors of the St Pancras and Somers Town Ward and the Regent's Park Ward. Consultation letter and proposed plans were sent by email on 10th February 2022. Consultation letters were also sent to the residents of St Richards House, Eversholt Road, NW1 1BS.			
Summary of outcome/main issues raised (include copies of relevant correspondence): To date, no response has been received.			

School/College

Location of site in relation to school/college (include name of school/college): A search for schools and non-domestic childcare institutions was conducted via Ofsted and Department for Education databases. The nearest schools are St Mary and St Pancras School which is located approximately 94m away, and Maria Fidelis Catholic School which is located approximately 150m away.
Outline of consultation carried out with school/college (include evidence of consultation): Consultation letters were sent by tracked email to the headteacher and chair of governors of St Mary and St Pancras School and Maria Fidelis Catholic School by email on 10th February 2022.
Summary of outcome/main issues raised (include copies of main correspondence): To date, no response has been received.

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?	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:	07/03/2022		

3. Proposed Development

The proposed site:

3.1 EE and H3G (known as the operator Three) have a rooftop base station located at Euston House, 24 Eversholt street, Camden, NW1 1AD (ref: 95373) which provides network coverage to the surrounding area. This site is being lost from the network for reasons beyond the operators' control therefore, a replacement site is required to prevent any loss of services when the apparatus is removed. This proposal is required to provide continued mobile coverage to the local area.

3.2 The existing telecommunications site currently provides network coverage to the surrounding area and the potential loss of this site from the network, will result in a loss of communications and data services locally and a wider disruption to the mobile network, if a replacement site, which replicates the lost coverage, cannot be identified and integrated into the network at the earliest opportunity. This operational base-station must be decommissioned in the near future, generating need for a replacement site to avoid a coverage gap in the mobile network.

3.3 The application site is located on the rooftop of St Richards House, 110 Eversholt Street, London, NW1 1BS. This is a seven storey residential building, with commercial development at ground floor level. The building is located to the east of Euston Train Station, in central London. The wider surrounding area is of urban/inner city environment in nature, consisting of mainly densely spaced commercial and residential buildings, with train station infrastructure. The application site is removed from any listed buildings or sensitive land designations.

Figure 1: Aerial view of the application site and local context, application site shown be red arrow (Source Google maps)

3.4 In order to ensure that no coverage gaps are created as a consequence of the decommissioning of the existing installation, the proposed development, is required and will work to ensure the existing coverage is continued and improved upon. Additionally, as the next stage of technological advancement (5G) is currently being rolled-out across the UK. The proposed development will be 5G-ready and will allow the provision of new cutting-edge coverage for two major mobile Operators to the local area.

3.5 Prior approval is sought for the installation of telecommunications equipment on the rooftop of St Richards House consisting of the installation of 2No. 5.39m tripod support poles supporting 2No. antenna apertures each (4No. in total) at plant room level (29.14m AGL), the installation 1No. 6.6m wall mounted support pole supporting 2No. antenna apertures fixed to plantroom wall (28.1m AGL), the installation of 2No. 1.5m support poles supporting 1No. 600mm dish each (2No. dishes in total) at plant room level (25.5m AGL), the installation of 4No. cabinets at main roof level and ancillary development thereto. Prior approval is not sought for the equipment cabinets as they represent Class A permitted development under Part 16 of schedule 2 of the GPDO.

Enclose map showing the cell centre and adjoining cells if appropriate:
Network information is provided separately within this application.

Type of Structure *(e.g. tower, mast, etc):*		
Description: The installation of 2No. 5.39m tripod support poles supporting 2No. antenna apertures each (4No. in total) at plant room level (29.14m AGL), the installation 1No. 6.6m wall mounted support pole supporting 2No. antenna apertures fixed to plantroom wall (28.1m AGL), the installation of 2No. 1.5m support poles supporting 1No. 600mm dish each (2No. dishes in total) at plant room level (25.5m AGL), the installation of 4No. cabinets at main roof level and ancillary development thereto. <u>Proposed Equipment Housing Cabinets (Permitted Development)</u> 1 x Link AC Mk5B Cabinet (1.2 x 0.6 x 1.6m) 1 x EE BBU Cabinet (1.5 x 0.6 x 2.1m) 1 x H3G BBU Cabinet (0.65 x 0.70 x 1.10m) 1 x FURO Cabinet (0.75 x 0.6 x 2.1m)		
Overall Height:		29.14 Metres (top of antennas)
Height of existing building *(where applicable):*		21.15 Metres (main roof level), 23.43 Metres (plant room level)
Equipment Housing: *See above*		
Length:		
Width:		
Height:		
Materials *(as applicable):*		
Tower/mast etc – type of material and external colour:	Antennas & dishes – white plastic/steel	
Equipment housing – type of material and external colour:	Light Grey	

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

3.6 The equipment's design is based on the principle of meeting operational requirements of the mobile operators EE and H3G (Three), whilst minimising the impact on the context and visual amenity of the surrounding area, as far as technical constraints allow.

3.7 The objective of this site is to ensure coverage to the area is replaced and enhanced, and disruption to the wider network is not caused, due to the decommissioning of a nearby telecommunications site at Euston House, 24 Eversholt street, Camden, NW1 1AD (ref: 95373).

3.8 When a site is decommissioned, the obvious impact felt is the loss of coverage that that site provided however, it can also cause greater disruption to the wider network. This is because each site connects to another, that one to another and so on, so if one is decommissioned the impact can reach far further than the immediate consumers. The objective, and need, for a replacement site in this area is henceforth established and justified but will be explained further in Section 4 of this document. Section 5 further below justifies why the proposal site is the best suited for the placement of a telecommunications site.

3.9 By way of background information, in designing a radio base station it is necessary to incorporate certain vital elements and to work around a number of technical constraints. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signal(s), 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).

3.10 Other elements necessary for the base station to function are the power source (a meter in a cabinet or a generator on sites where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas, link dishes and the various support structures, grillages and fixings, often referred to in general terms as "development ancillary to" the base station.

3.11 The applicant gives due regard in designing all new sites to limit the visual impact through good design. In this instance the proposed installation is subject to technical and build constraints. That notwithstanding, it is submitted that the appropriate siting and design put forth mitigate any potential impact on the site and its surroundings to an acceptable level. The base-station has been designed to accommodate replacement apparatus, allowing provision of 2G, 3G and 4G mobile connections to the surrounding area to continue. It has also been designed to accommodate new 5G technology, introducing ultra-fast mobile connectivity capable of operating the 'Internet of Things'. This upgraded and replacement infrastructure will provide higher mobile down-load speeds and more reliable, quicker phone connections. There would be increased capacity to provide services to a higher number of people at the same time.

3.12 To achieve the required replacement coverage and network improvement for both EE and H3G, 6No antenna apertures and 2No 600mm dishes are required. The number and scale of proposed antennas and dishes is informed by the number of communication services being provided (4G, 5G etc.); the fact that the base-station will be multi-operator meaning that both EE and Three require apparatus; and because of the high technical capability of 5G services.

3.13 The antenna height is determined by a specialist network radio engineer using specialist software which factors in the area that coverage is required, the relationship between the selected site location and existing cell sites in the linked network and variances in land levels and elements such as nearby trees or buildings, which can block or weaken signals.

3.14 The antennas must be allowed to unrestrictedly emit a radio signal meaning they need to be sited at a high position on the rooftop to help the radio signal clear surrounding structures, such as buildings and trees, with the aim of avoiding signal interference. The radio frequencies that 5G operates at is particularly sensitive to interference from solid objects which necessitates elevating the antennas at the height proposed. Furthermore, the height of the antennas would be at the lowest possible to provide the required level of replacement coverage and would also ensure compliance with ICNIRP guidelines.

3.15 The aforementioned factors have informed the type and height of the antennas, and as such the necessary supporting structure. The 6No. antenna apertures are proposed to be supported by 2No tripod support structures, with the height to the top of these antenna apertures measuring 29.14m, and 1No wall mounted support structure, with the height to the top of these antenna apertures measuring 28.1m. The antenna apertures are located in pairs on the north eastern corner, the south eastern corner and the western side of the plant room.

3.16 In the same regard as the antennas, the position of the dishes is informed by physical constraints of the site and surrounding area, and the outcome of software modelling. The dishes must connect to other base stations in the wider network by microwave link. As such they require ‘line of sight’ which is an unobstructed path to neighbouring base stations. In this instance 2No. 600mm dishes are required. These are proposed to be located on the eastern side of the plant room, at 25.5m above ground level, each on a 1.5m support pole. The size and number of dishes has been kept to the minimum required for operational efficiency and the associated impact of this addition on the surroundings would be minimal.

3.17 Radio signals are generated within radio equipment housing cabinets and in this case, 4No. equipment cabinets would be required to replace and improve the network. The proposed antenna apertures must connect to the proposed equipment housing cabinets by electrical cable feeders. The equipment cabinets form an essential component of the base-station and must be located as close to the antenna apertures as possible in order to minimise electrical power losses during operation. It is proposed to install the cabinets at the main rooftop level on a cabinet support frame, situated to the south west of the plant room where all other equipment is located.

3.18 There is very limited scope to alter the design in order to meet the technical requirements, nonetheless it is considered the proposal now put forward is appropriate to the site and its surroundings and avoids any unacceptable level of impact.

3.19 Due consideration has been given to the process and this proposal put forward is the best available option – it both achieves the technical requirements and does not bring unacceptable harm to the character of the area. The guidance given by the Government on the balance Local Authorities must take between these two factors – technical achievements of telecommunications developments and visual harm – will be clarified in section 5 of this document under ‘Policy’.

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 and H3G operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of EE and H3G's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.	**Yes**	No

4. Technical Justification

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

Replacement Coverage

4.1 The principle aim of the proposal is to provide partial replacement communications coverage from an operational base-station which must be decommissioned due to reasons beyond the Operators' control. Everything Everywhere (EE) and Three – two of the major licenced mobile operators in the UK – presently provides communications services from a base-station at Euston House, 24 Eversholt street, Camden, NW1 1AD (ref: 95373).

4.2 The proposal is required in order to allow the continued provision of 2G, 3G and 4G mobile connections to the surrounding area. The consequence of not doing so is that users of the network would find that the services they previously had access to are either limited or removed. The provision of poor communication services has well recognised socio-economic impacts on communities and businesses.

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

4.4 When an existing site is lost from the network it leaves a very specific "gap" in coverage within the established network pattern which needs to be filled. The consequence of not doing so is that users of the network find that the services they previously had access to are either limited or removed.

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

4.6 The UK Government recognises the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

4.7 The Planning Inspectorate too has in recent years continually recognised the importance of this issue and cited it in appeal decisions that have overturned the decisions of local authorities across the UK where there has been a failure to apply due weight to the value of connectivity to social and economic prosperity in the assessment of applications made for telecommunications development, even in protected or sensitive areas. As an example, in October 2018 the decision of Winchester City Council to refuse prior approval for the installation of a 17.5m high monopole and associated equipment housing, required to replace an established site being lost from Vodafone's network, was overturned by the Planning Inspectorate (CTIL and Vodafone Vs Winchester City Council, appeal reference APP/L1765/W/18/31975). Within the decision notice, the Inspector stated that:

"I attach significant weight to the public benefit arising from the continuation of local service provision…. Having regard to all relevant considerations... my findings are that the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area".

4.8 A similar circumstance exists in this case, with the application proposal required to prevent the loss of services on two networks, a matter certainly in the public interest.

Enhanced Services

4.9 The new base-station would also provide new 5G services, introducing ultra-fast mobile connectivity capable of operating the 'Internet of Things'. This upgraded and replacement infrastructure will provide higher mobile down-load speeds and more reliable, quicker phone connections.

4.10 Importantly, the base-station would provide increased network capacity, allowing quality service provision to a higher number of people at the same time. Improving cellular connectivity is led largely by demand. The very high level of mobile phone use in the UK requires the installation of additional/upgraded base stations to provide the necessary connections.

Coverage Plots

4.11 The following images are extracts from radio planning software which model the resulting loss in mobile coverage should the operational base-station not be replaced following its decommissioning. The images show outdoor 4G coverage with the existing site (Euston House), without the existing site and with the proposed application replacement site for Three. These are based on the existing site at Euston House, and the future coverage based on this proposal. Full coverage plots for both operators are provided with the application submission.

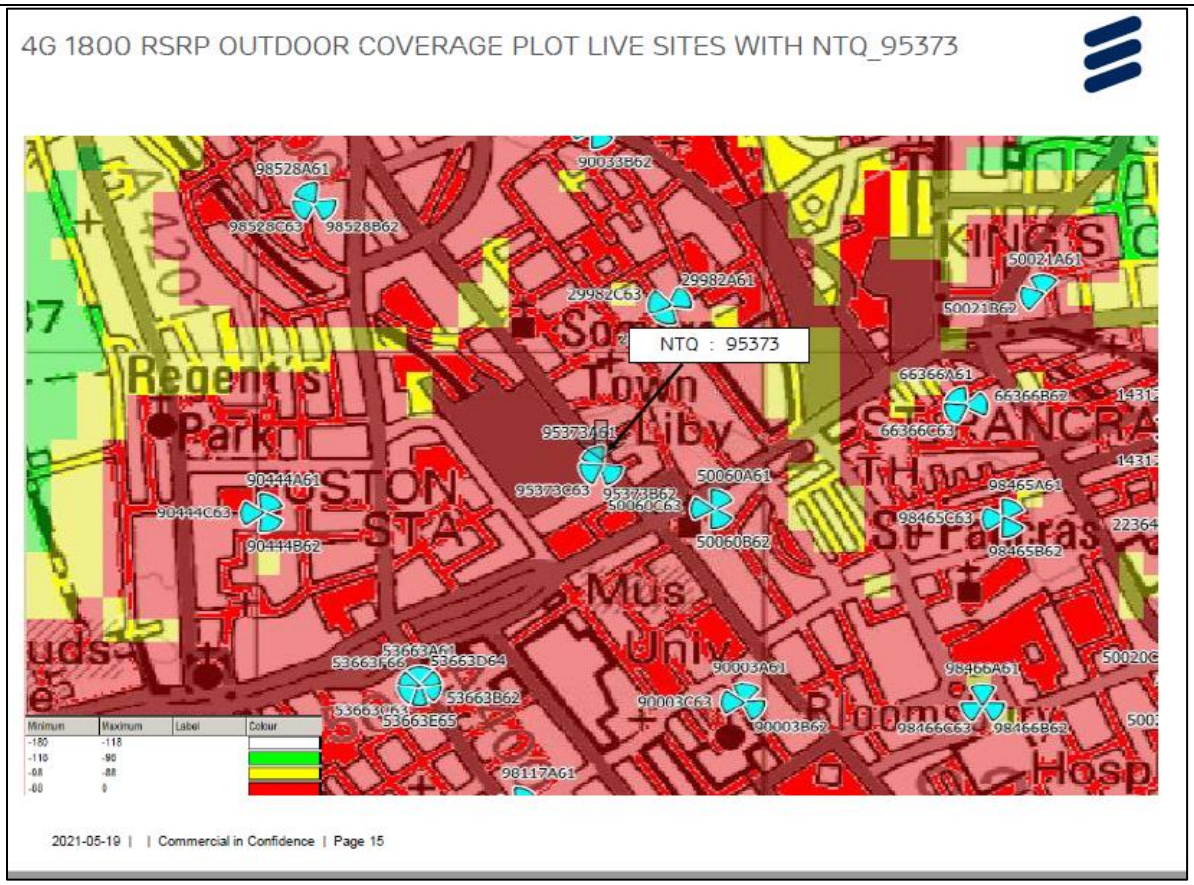

Figure 2: 4G outdoor coverage for Three with site at Euston House

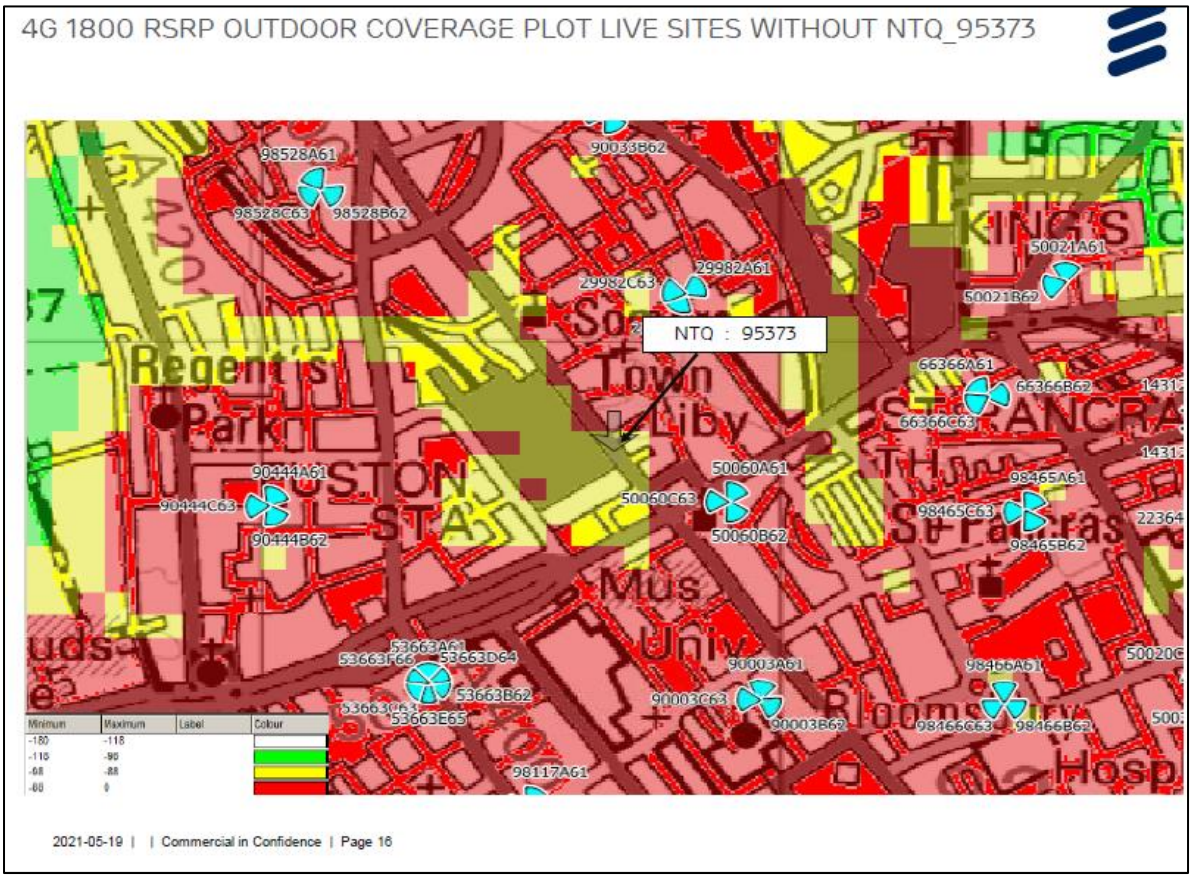

Figure 3: 4G outdoor coverage for Three without site at Euston House

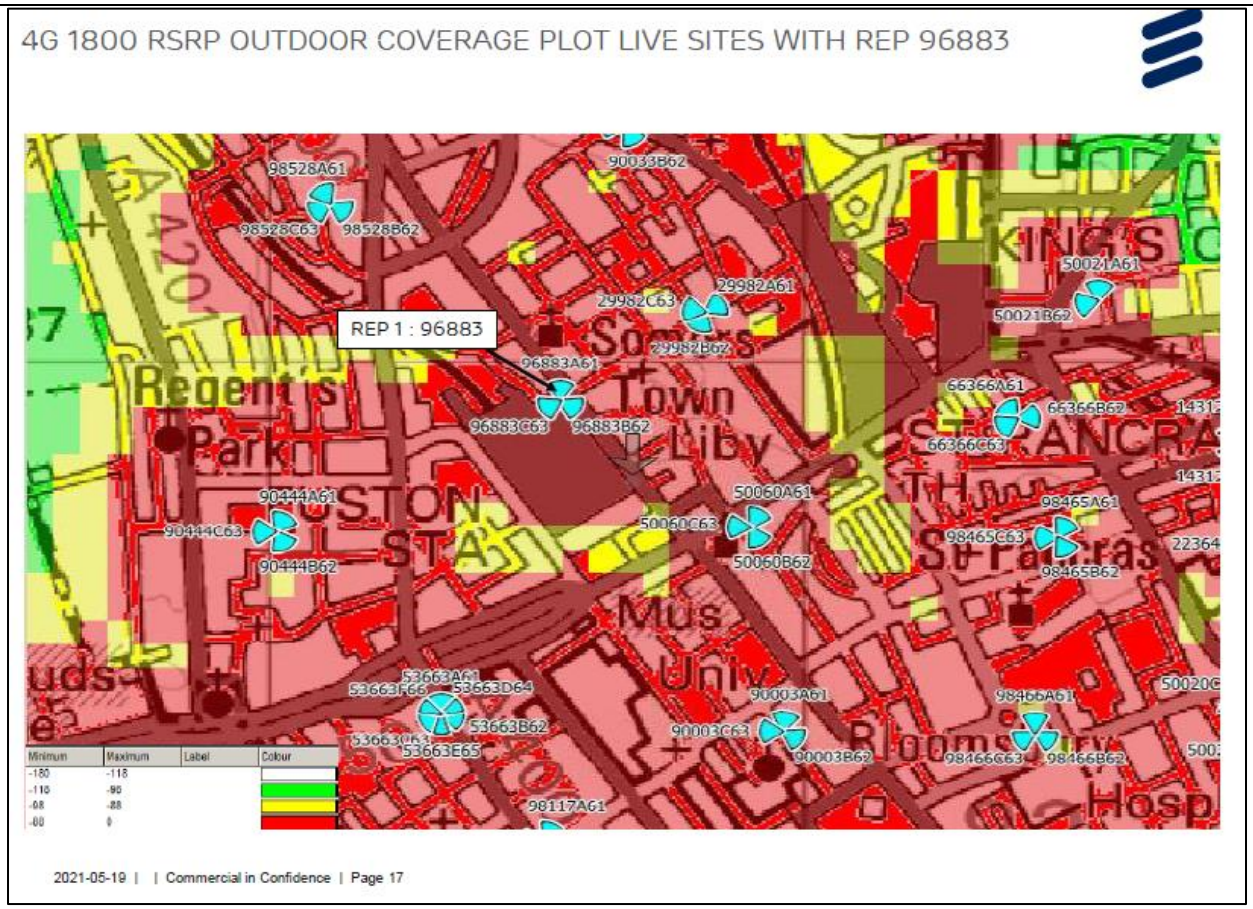

Figure 4: 4G outdoor coverage with application site

4.12 A review of the above figures shows that should the proposed base-station not become operational then there would be coverage gaps across a large geographical area where service would not be available or would be significantly poorer for Three (compare Figures 2 and 3). The proposal at the application site would successfully replace a large part of the predicted loss in coverage area (compare Figure 4).

4.13 As evident, Three and EE will lose 4G indoor coverage when the existing site is decommissioned. The proposal site partially fills that lost coverage for 4G coverage as well as increasing the geographical area and capacity for which coverage can be provided where services currently do not reach.

4.14 It should be noted that these plots only show the geographical coverage footprint, and do not show the improvements to the capacity of the network, although this is also a critical consideration which will also be significantly improved as a result of the new installation.

Public Benefits

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

4.16 Ofcom's 2018 Communications Market Research Report[2] shows that smartphones are owned by four of every five UK consumers. While take-up of fixed broadband has plateaued at 80%, accessing the internet on a mobile phone continues to grow, from 66%

[2] https://www.ofcom.org.uk/__data/assets/pdf_file/0022/117256/CMR-2018-narrative-report.pdf

in 2017 to 72% in 2018. Demand for data continues to grow rapidly for UK consumers, with 1.9GB consumed by an average mobile subscription per month in 2017, (up from 1.3 GB the previous year). The report found that more than seven in ten now use their mobile to access the internet.

4.17 More than any previous generation of mobile networks, 5G has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time. 5G will have the ability to handle demand, offering faster download and upload speeds and enabling more devices to simultaneously access the mobile internet[3]. This proposal would provide higher mobile down-load speeds and more reliable, quicker mobile phone connections.

4.18 The UK Government recognise the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. Paragraph 114 of the NPPF (2021) 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)) ...*"

4.19 The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal, to enable EE and Three to provide replacement and improved network services and capacity to the surrounding area, will assist in achieving these objectives within this area.

4.20 The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the upgrading of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

4.21 This support for the improvement to the mobile communications network including 5G services was also set out in "Collaborating for Digital Connectivity" of March 2019[4]. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers stated: *'…We would also like the UK to be a world leader in 5G, with the majority of the population covered by a 5G signal by 2027'*.

4.22 The latest amendment to Part 16 of Schedule 2 to the General Permitted Development Order (England) came into force in 2016, increasing the permitted development rights for installation of communications apparatus, demonstrating the importance that the Government attributes to delivering critical mobile digital infrastructure. In April 2021, the Government launched a consultation entitled 'Changes to permitted development rights for electronic communications infrastructure: technical consultation'[5]

[3] Mobile UK: https://www.mobileuk.org/5g-benefits
[4] Collaborating for Digital Connectivity 2019: http://democracy.epsom-ewell.gov.uk/documents/s17211/Telecommunications%20Equipment%20Wells%20Road%20Appendix%203.pdf
[5] Permitted Development rights - Open Consultation April 2021: https://www.gov.uk/government/consultations/changes-to-permitted-development-rights-for-electronic-communications-infrastructure-technical-consultation/changes-to-permitted-development-rights-for-electronic-communications-infrastructure-technical-consultation

which looks at how to implement the proposals that were consulted on in August 2019, demonstrating sustained commitment for Government to enable the smooth rollout of the latest digital technology. The Minister for Digital Infrastructure, Matt Warman MP, outlines in this consultation:

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

It is welcome that all four Mobile Network Operators have started to deploy 5G networks, meaning 5G is now available in over 200 towns and cities across the United Kingdom. We must, however, continue to ensure people have access to fast, reliable digital connectivity and mobile coverage. The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliant on mobile connectivity.'

4.23 These proposals to build on the expanded permitted development rights for communications infrastructure, further demonstrate this significance of critical mobile digital infrastructure to the public interest and highlights the importance of delivering 5G services in particular, and furthermore the importance of digital connectivity to the economic and social objectives of government.

4.24 This consultation is relevant to the application, as not only does it highlight the crucial need for the proposal but also, the Government's continued support and commitment to improving digital connectivity in England. Enhancing the mobile networks is of vital national importance in the short term, and it is significant that telecoms has been designated as "critical work" during this time, but it is anticipated that the current shift towards homeworking and online services will persist, to a lesser degree, in the future. It is vital that this critical infrastructure is in place throughout the UK to meet this demand.

4.25 Mobile connectivity is becoming ubiquitous, and the expectation is that it should be available throughout the country. Ofcom's Connected Nations 2020 UK report[6] explains the important role of Mobile Networks Operators (MNO's) such as EE and Three:

*"**We expect MNOs to leverage other benefits of 5G as they continue to rollout their networks and to provide connectivity solutions for both consumers and businesses.** This includes private networks for businesses, which will facilitate greater control and privacy in addition to connectivity. (emphasis added)*

5G will continue to target a range of other applications (e.g. manufacturing, logistics, agriculture, automotive, energy, media & entertainment and healthcare sectors) to deliver benefits to consumers, businesses and organisations. 5G (3GPP Release 16 & 17) has features such as near instantaneous network response (a latency of only a few milliseconds) and high reliability which are key enablers for these applications…"

4.26 The benefit of having a strong and resilient network has been highlighted over the past year, following the sudden shift in the network requirements due to the COVID-19

[6] https://www.ofcom.org.uk/__data/assets/pdf_file/0024/209373/connected-nations-2020.pdf

pandemic. The Government Minister of Digital Infrastructure, Matt Warman, stated during a Keynote speech, at a Connected Britain Event in September 2020[7]:

"The world is in the middle of a digital revolution. ***COVID has accelerated this process, digitising almost every part of our everyday lives and making the infrastructure that connects us more important than ever. That's why it is at the top of the government's agenda…***

We are taking forward legislative reforms to make it easier for you to deploy broadband in blocks of flats and to deploy or upgrade mobile phone masts." (emphasis added)

4.27 More recently, as part of the Levelling Up White Paper[8] released by the government in February 2022, one of the 12 'missions' of the paper, highlighting the importance of providing high quality communications infrastructure, states *"By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for most of the population.*", allowing for strong business performance, growth and jobs in news sectors and raised living standards:

"***The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society****, from ensuring business continuity to reducing isolation.* ***Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working…***

More broadly, ***high quality digital infrastructure can deepen local labour markets through remote working****, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas.*

The sector also provides opportunities for raising living standards *– median earnings for the sector are 50% higher than the UK average."*

4.28 The recognised public benefits of 5G are not just localised. PricewaterhouseCoopers (PwC) recently published an analytical forecast and review of the global economic impact of 5G[9]. This report outlines:

'For policy-makers and governments, the key is to regard 5G as fundamental societal infrastructure: *a platform that, by providing ubiquitous, superfast broadband, will influence the competitiveness of nations' economies and their ability to develop their own sunrise industries and technologies.* ***Policy-makers should look to encourage and provide incentives for 5G investments as quickly as possible****.'*

4.29 On a wider scale, the proposal would contribute towards the country's connectivity and digital economy future. Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion, and, on a local scale, it is important to ensure the improvement of telecommunications networks in this area.

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[7] Connected Britain 2020: https://www.gov.uk/government/speeches/matt-warmans-keynote-speech-at-connected-britain-2020

[8] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1052708/Levelling_up_the_UK_white_paper.pdf

[9] PwC - The global economic impact of 5G: https://www.pwc.com/gx/en/tmt/5g/global-economic-impact-5g.pdf

4.30 In addition, EE (UK) Ltd will be supporting the communications requirements of Emergency Services where further rollout and improvements in the 4G signal is currently being progressed.

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)

5.1 Site location is critical in network planning and becomes even more so when there is need to replace an existing base station already operating within the established cellular pattern. When an existing site is lost, it leaves a very specific and unique gap in the network, much like removing a piece from a completed jigsaw would. This gap needs to be refilled if users living and working within in area are to be able to continue to use their mobile phones and other wireless devices. This places even greater limitations on the potential siting opportunities, as many locations will not enable this specific gap to be adequately filled.

5.2 When considering a replacement site for telecommunications equipment, there are many factors to be considered, not least the aesthetics of the site and planning considerations, but also the need to meet the network's requirements. The applicant has expended considerable time and efforts in identifying a suitable site which balances the coverage requirements with a host of other aspects.

5.3 There are specific constraints associated with site placement in mobile network planning. It has already been touched upon that radio base stations can each only cover a limited geographical area known as a cell and that cells are designed to overlap to form an unbroken network.

5.4 Prior to selecting the proposed site, a comprehensive investigation was undertaken by the applicant's network planners, acquisition and planning agents to find a site specifically capable of replacing that at the existing base-station at Euston House. Potential sites are considered in terms of their technical suitability to provide the required level of service, the effect on visual amenity and their ability to be acquired, built and maintained. The aim of site identification is to find the most technically efficient site, which has the minimum impact on visual amenity. Various options might theoretically be suitable in terms of one of these considerations, but not the other. A balance between the two must be achieved.

5.5 In accordance with planning policy, a sequential approach to site selection was adopted. The potential to use an existing structure was given preference over installation of a ground-based mast.

5.6 The application site was selected following a thorough search and detailed investigations. The decision factored multiple considerations, including:

- distance from the base-station it will replace;
- ground conditions and elevation level;
- ability to acquire the land;
- vehicle access to build/maintain the base-station;
- potential for neighbouring trees & buildings to obstruct radio signal;
- minimising environmental impact, including protecting designated areas

5.7 On the matter of alternative sites, an appeal decision by the Planning Inspectorate clarifies that it is an unreasonable expectation to consider every potential siting option when searching for a site to install communications apparatus. The reference to the superseded PP8 still stands in the replacement NPPF:

*'**Nor do I consider that it is realistic or reasonable to take the view that the absence of consideration of every possible option alternative would mean this element of the policy was not complied with.** PPG 8 does not indicate the need to embark on an examination of every possible alternative in an iterative process. As accepted at the Inquiry by the Council's planning witness, **the adequate analysis of feasible alternatives is a more realistic approach,** a view with which I concur' (para. 12) (appeal ref. APP/Y3425/A/02/1084110)*

5.8 The siting of the proposed development has been as carefully selected. The search area is very specific, and a location was identified which would ensure continued network provision, but which also would not encroach on the other cell sites within the Operators network.

5.9 The area from within which a site will be capable of providing the desired coverage, the "Directed Search Area" (DSA), is determined by network radio planners. There are no comparable structures within the search area that can accommodate the required equipment, necessitating the need to utilise a building, in line with the NPPF. For a rooftop installation, the roof must be flat, with clear lines of site and be structurally able to accommodate the heavy equipment.

5.10 The National Planning Policy Framework stipulates 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.' (para. 113) (emphasis added)

5.11 The host building is in a prominent and ideal location within an urban area, which enables uninterrupted coverage to be provided to the high number of mobile users in the surrounding area, including commuters and residents.

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
Rooftop	Morgan Sindall Infrastructure, 1 Eversholt St, London NW1 2DN	529666, 182668	This option has been discounted as the application site is the preferred town planning option, given this sites proximity to numerous listed buildings and is located within Bloomsbury Conservation Area, the application site is preferable in planning terms, being outside of any conservation area and further separated from listed buildings.

Streetworks	Euston Square Gardens, 11 Euston Square, London NW1 2DY	529701, 182595	This option has been discounted as the application site is the preferred town planning option, as when using the sequential site selection process, an existing building rather than the installation of a new ground-based mast is preferred. Further to this, given this sites proximity to numerous listed buildings and is located within Bloomsbury Conservation Area, the application site is preferable in planning terms, being outside of any conservation area and further separated from listed buildings.
Rooftop	Travelodge London Central Euston, 1-11 Grafton Pl, London NW1 1DJ	529726, 182666	This option has been discounted as the rooftop is currently in use as a rooftop garden and as such it is unsuitable for telecommunications development. Further to this given the buildings proximity to Bloomsbury conservation area the application site is preferable in planning terms, being further removed from any conservation area.
Rooftop	16 Upper Woburn Pl, London WC1H 0AF	529771, 182550	This option has been discounted as the rooftop is unsuitable for telecommunications development. Further to this, this option is located within Bloomsbury Conservation Area, and as such the application site is preferable in planning terms, being outside of any conservation area.
Rooftop	Director's Club, Euston, Doric Way, London NW1 1DA	529653, 182770	This option was discounted as the building is too low to allow technical requirements to be met.
Rooftop	72 Euston St, London NW1 2HA	529422, 182545	This option was discounted as the building is too low to allow technical requirements to be met.
Rooftop	Regent House, Eversholt St, London NW1 1BY	529586, 182862	This option was discounted as the rooftop is pitched and therefore not suitable for this type of development.
Rooftop	Evergreen House North, Grafton Pl, London NW1 2DX	529793, 182667	This option was discounted as the building is too high to allow technical requirements to be met.

If no alternative site options have been investigated, please explain why: N/A
Additional relevant information (include planning policy and material considerations): **Environmental Information:**

5.12 The application site does not fall within any environmental designations and is not ecologically sensitive. There is no evidence of any protected species or their habitats in this location. Furthermore, a check of the Environment Agency website has confirmed the site is not within a Flood Zone area.

Land use planning designations:

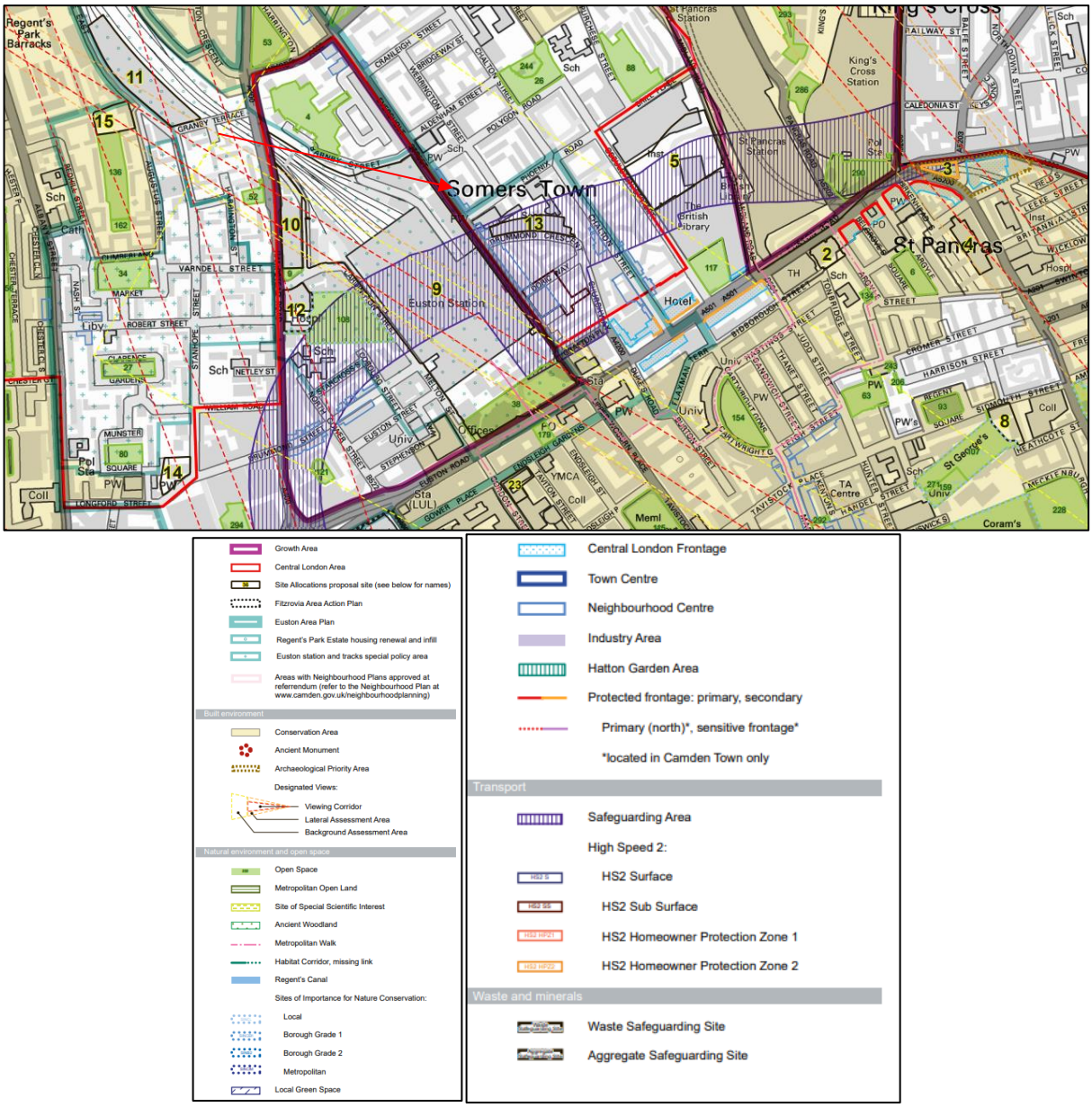

Figure 5: Extract from Local Plan Policies Map and key, application site shown by red arrow

5.13 As per Figure 5 above, the application site is not located within any designated areas such as conservation areas. A Grade II listed building is located approximately 100m to the north of the application site. Given the distance, the height of the host building and intervening development, it is not considered that the presence of telecommunications equipment here will have any impact on the setting of this listed building.

Siting and Appearance:

5.14 The proposal is permitted development subject to applying for a determination as to whether the prior approval of the authority will be required, as to the siting and appearance of the development. This section should be read in conjunction with the preceding sections of this statement where a description of the application site, technical details and justification for the design and details of the public benefits of the proposal are provided.

5.15 The applicant gives due regard in designing all new sites to limit the visual impact through good design. In this instance the proposed installation is subject to technical and build constraints. That notwithstanding, it is submitted that the appropriate siting and design put forth will mitigate any potential impact on the site and its surroundings to acceptable level. It is considered that the proposal offers the least visually intrusive site and design available to the applicant which also ensures suitable replacement and enhanced mobile coverage can be provided to the wider area.

5.16 It should be recognised that the proposal seeks to replace an existing electronic communications installation that is being decommissioned and lost from the network. As such, there will be no net gain of telecommunication installations within the area.

5.17 Further to this, it is considered that the proposal utilises the most suitable design available to meet coverage demands. It is important to keep the impact of telecommunications development in the area to a minimum. The Code of Best Practice on Mobile Network Development in England emphasises that “existing masts, buildings or other structures should be used unless the need for a new site has been justified”, encouraging the use of existing sites and building based installations to improve connectivity where possible, such as in this case. In this case, there are no existing mast that are available or suitable for this proposed installation, however the technical requirement can be met through utilising a building based installation. It is therefore considered that the siting of the proposal is wholly appropriate as it prevents the need to deploy a new telecommunications site elsewhere in the area. The alternative of proposing an additional ground based installation in the area to provide the enhanced coverage would have a greater overall impact

5.18 Given the height of the host building, views of the proposed installation from the immediate surrounding area will be minimal. The proposed antenna apertures and dishes are located on the plant room, which is situated in the centre of the rooftop. The antenna apertures are proposed to be sited on the western side, north eastern corner and south eastern corner of the plant room. Siting the equipment on the plant room as is proposed with this installation removes the requirement for larger, more visually intrusive support structures such as a stub tower, and siting on the plant room means the equipment is away from the edges of the building, and as such less likely to be visible from ground level.

5.19 Some views of the installation are likely to be achievable along Eversholt Road to the northwest and southeast, however as shown in Figure 6 below, given the height of the building, the dense and tall nature of development in the area, and the presence of trees lining the streets, these views are limited. Further to this, given the nature of the surrounding area, it is not considered that the presence of telecommunications infrastructure here will appear incongruous or out of place.

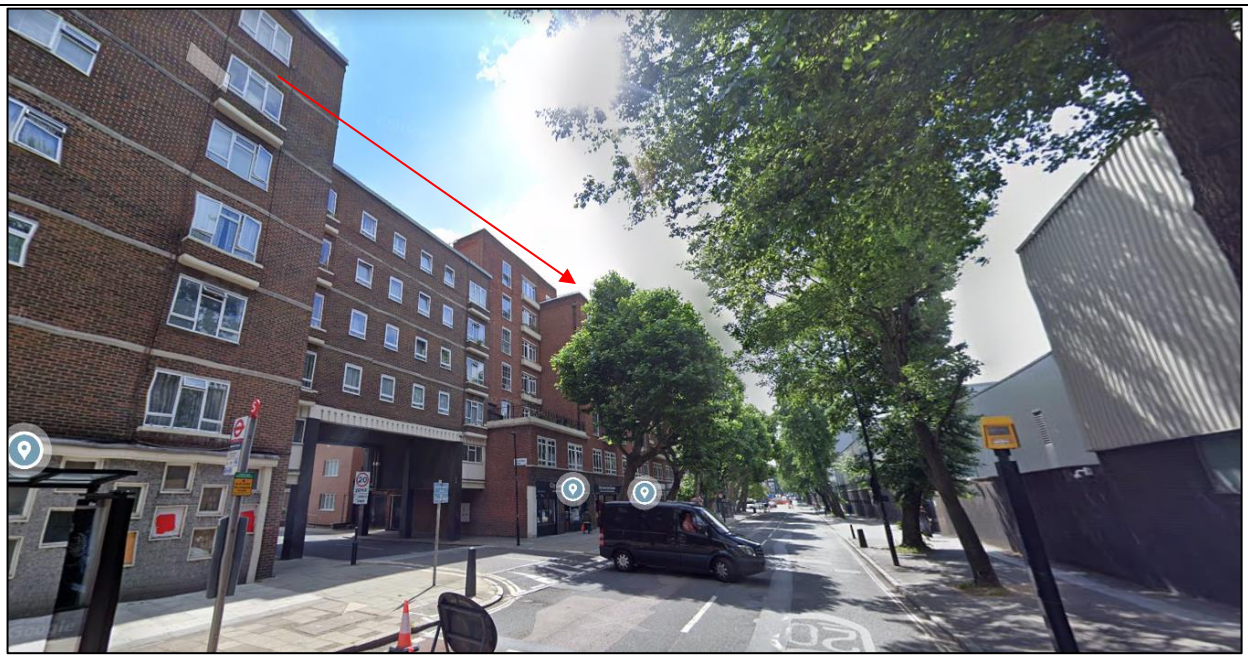

Figure 6: View of the application site from Eversholt Road, application site shown by red arrow (Source: Google Maps)

5.20 Whilst it is acknowledged that the installation will be visible from the surrounding area, it should also be acknowledged that visibility is not the same as harm and a partial view will not impede use or enjoyment of the surrounding spaces.

5.21 The proposal has been designed specifically to achieve a balance between meeting the technical requirement of the operators and avoiding harm to the site or the surrounding area. It is considered that this location offers the optimum location in terms of siting and design. Any perceived harm it may impose on the surrounding area is considered to be outweighed by the provision of continued and enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

5.22 The proposed development amounts to a measured change to the appearance of the surrounding area which should be weighed against the far reaching environmental, economic and social benefits of the continued provision of 2G, 3G and 4G services, and new provision of 5G services brough by the new base-station, serving the population of the surrounding area.

Planning Policy Context:

Development Plan

5.23 Section 70 of the Town and Country Planning Act 1990 (as amended) requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations. 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.

5.24 The development plan for The London Borough of Camden consists of The Camden Local Plan (2017) and The London Plan: Spatial Development Strategy for Greater London (adopted 2021).

The London Plan 2021

5.25 A new London Plan was adopted in March 2021. In a similar fashion to the previous London Plan (2016), the new London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In 'Policy SI 6: Digital Connectivity Infrastructure' the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to ensure its global competitiveness, now and in the future.

5.26 It is considered that the Operators' networks are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. The written justification for Policy SI 6 states the following:

"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.***

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 (emphasis added).

Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their Development Plans".

5.27 Policy SI 6, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing EE and Three to provide continued and significantly enhanced coverage to the surrounding area. The proposed development meets the aims of the London Plan (2021) and the long-term strategies which the Mayor aims to achieve through this guidance.

London Infrastructure Delivery Plan 2050 (published 2014):

5.28 As part of the work on the 2015 London Plan Alterations, the Mayor commissioned work to develop a long-term infrastructure investment plan for London, and in 2014 the 'London Infrastructure Delivery Plan 2050' was published. The stated aim of the Infrastructure Delivery Plan is to provide for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan, Digital Connectivity, indicates how the Mayor's Office will support a mix of technologies including mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term, as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. Deployment of the proposed base station will

contribute to London's agenda for reliable high-speed communications as it has been designed to incorporate emerging and future technologies. Among other matters the Delivery Plan stated:

"*Broadband is now considered the fourth utility. The Government has stated that it wants 99% of the population to have superfast connections by 2018. Internet access speeds and coverage affect the productivity of businesses and are now a factor considered by homebuyers. Access is not only essential to many businesses, but also, as more local authorities are encouraged to move the services they provide online, access is essential for residents to be able to take part in a modern society. The Mayor wants every resident and business in London to be able to have affordable high-speed internet connectivity, should they choose to access it".*

5.29 This proposal seeks, individually, to provide high speed internet connectivity throughout London.

Camden Local Plan (Adopted July 2017)

5.30 There are no policies relating directly to telecommunications development within the Camden Local Plan (2017). General policies of relevance include D1 (Design) and Policy A1 (Managing Impact of Development).

5.31 Policy D1 – Design sets out the requirements for proposed development to be of good quality design. Much of this policy is not relevant to this proposal, but it is outlined below for ease of reference:

'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.'

5.32 It should be noted that siting of telecommunications equipment on the rooftop of residential blocks is common, due to height and limited visibility if sited correctly. Siting on a rooftop such as the application site allows technical objectives to be met without the requirement for large ground based installation. Further to this, as previously outlined, siting the equipment on the plant room level of the rooftop removes the requirement for much larger, more visually intrusive rooftop support structures such as a stub tower, in order for technical requirements to be met safely.

5.33 It is considered that the proposed scheme, by negating the requirement for larger and potentially more visually impactful ground based or rooftop based equipment, and by providing the least visually intrusive option to meet the technical requirements for EE and Three, respects the local character and context in terms of its design, and as such is compliant with Policy D1. Whilst it is acknowledged that there will be some level of visual change, it is considered that the option and design put forward amounts to a measured change to the appearance of the surrounding area which should be weighed against the far reaching public benefits of continued and enhanced coverage.

5.34 Policy A1 - Managing Impact of Development outlines requirements of development to ensure that standards of amenity are protected. Given the height of the building and the surrounding blocks, it is not considered that the proposal will have any impact on loss of outlook or daylight, or any overshadowing. As outlined in previous sections, this installation has been reduced in size and scale as far as technically possible, reducing any visual impact on the surrounding area, whilst providing public benefit in the form or continued and improved electronic communications services for two major mobile operators. Whilst it is acknowledged that there will be some visual change, this visibility does not equate to harm, and will not have an impact on the use or enjoyment of surrounding spaces.

National Policy

National Planning Policy Framework (NPPF) 2021

5.35 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'*.

5.36 The NPPF identifies objectives to achieve the aim of sustainable development:

'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.' (paragraph 8)

5.37 The proposal would meet the aims of sustainable development with respect to providing critical mobile digital infrastructure to underpin local economic growth; facilitating social inclusiveness through the provision of effective electronic communication services; and in an environmental role through supporting home-working, for example, which is linked to a reduction in transport emissions and therefore climate change mitigation.

5.38 Paragraph 114 emphasises the significance of delivering the latest communications infrastructure:

'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.'

5.39 The proposal is such 'essential' infrastructure, delivering high quality mobile technology, and as such it is national policy that planning decisions should support such proposal.

5.40 The NPPF encourages the use of existing buildings for new electronic equipment, as is the case for this application. The proposal therefore adheres to paragraph 115 of the NPPF which 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.'*

Other Relevant National Guidance

UK Digital Strategy

5.41 The UK Digital Strategy was published by the Department for Digital, Culture, Media & Sport in March 2017.

'Broadband and mobile must be treated as the fourth utility, with everyone benefiting from improved connectivity. This will play a crucial role in ensuring that everyone, wherever they live and however they connect, can make full use of digital services and benefit from participation I the digital economy. Improved connectivity also increases

innovation and productivity across the economy, bringing significant economic rewards'

Future Telecoms Infrastructure Review

5.42 The Department for Digital, Culture, Media & Sport published its findings of the Government's Future Telecoms Infrastructure Review in 2018. The review highlights the important and far reaching role of 5G infrastructure:

'Alongside finishing the roll out of 4G networks to meet existing mobile demand, we want the UK to be a world leader in 5G to take early advantage of this new technology. We have set a target that the majority of the population will have 5G coverage by 2027.'

'The technical capabilities and performance characteristics of 5G are clear. ***5G is expected to deliver faster and better mobile broadband services to consumers and businesses,*** *and to enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare.'(p 10)*

Ofcom Reports

5.43 Ofcom's annual Communications Market Reports identified trends which demonstrate reliance on reliable mobile connections:

'We all need high quality communications. In the modern world, a huge amount of our time is spent using communications services: for work, to stay in touch with family and friends, in order to go about our daily lives. ***Our ability to access and use reliable mobile and broadband connections has become fundamental to the way we work and live, and to the ability of businesses of all sizes to thrive.*** *For many people internet connectivity is not as essential as gas or electricity, and access to traditional television, radio, fixed phone lines and postal services continue to remain important' (2016 report*)

5.44 Planned economic growth cannot be sustained without the provision of essential utility infrastructure, including access to reliable, resilient and high-speed electronic communications. The proposal would increase the capacity of the base-station to enable it to more effectively serve a higher number of people.

5.45 The Operator would provide improved and new communications capability by establishing an additional telecommunications site, which is encouraged within the NPPF.

5.46 On the basis of the above assessment, the proposal is found to the proposal is found to be wholly appropriate and wholly compliant with local and national planning policy.

Other Material Considerations

5.47 Appeal decisions by the Planning Inspectorate can be of material consideration in the determination of planning applications. The following example appeal decision by the Planning Inspectorate, APP/L5240/W/21/3272152 - MBNL (EE UK LTD and H3G UK LTD) v the London Borough of Croydon, was for a similar scheme as the one

proposed in this application, consisting of a rooftop installation on a multistorey block of flats to replace a nearby base station which was being decommissioned.

5.48 The Inspector noted that *'whilst designed and sited so as to be functional within the applicable technical parameters, rather than aesthetically pleasing**, they are at least typical features within an urban context** such as that of the appeal site. **As the buildings are already large, they exert a visual influence over the area which the appeal proposal would cumulatively add to in only a modest way.'***

5.49 The Inspector highlights that as the host building, similar to the application host building, is large in size, the building itself exerts visual dominance meaning that the proposed equipment adds to in only a modest way. Due to the similarity of the schemes, it is considered that the same can be concluded from this scheme.

5.50 The Inspector also comments on the choice of the appeal site, *'Having regard to the proximity to the existing structure which it is intended to replace, **I consider the appeal site acceptable and the proposal a likely preferable alternative to a proximate ground-based location for a mast of 30 metres or more.'**.*

5.51 Similarly in the case of this application, the site which has been selected has been demonstrated to be the most suitable location for the installation, in terms of proximity to the decommissioned site and negating the requirement for a tall, ground based mast.

5.52 The Inspector also recognised that the appeal scheme is in the public interest, *'For the reasons given above but also **in recognition of the public interest reasons to maintain suitable network coverage,** and having taken all other matters into account, I conclude that **the appeal should be allowed and prior approval granted'***

5.53 Similarly, the vast public benefits of the application scheme have been laid out within previous sections of this document.

Summary

5.54 The application seeks the authority's approval for the siting and appearance of proposed communications equipment to be installed at St Richards House. The principle aim of the proposal is to replace communications coverage from an operational base-station which is to be decommissioned. In addition to replacing coverage, the proposal will also result in improved communication services including by increasing the capacity of the network and by introducing 5G services.

5.55 Everything Everywhere (EE) and Three – two of the major licenced mobile operators in the UK – presently provides communications services from a base-station at Bromyard House. The base-station must be due to reasons beyond the Operators' control and consequently mobile services from the site will cease.

5.56 The equipment layout and design are based on the principle of meeting operational requirements of the mobile operators, whilst minimising landscape and visual impact as far as technical constraints allow. The proposal would result in visual changes at the site, but this would enable far reaching public benefits for the surrounding area. The Operators EE and Three would share the site, thereby minimising the number of structures required and associated sites.

5.57 The proposal would not only ensure that a high number of residents, businesses, commuters and visitors to the area do not experience a loss, or poorer connectivity for their mobile devices, it would also provide upgraded services. Modern communication services have evident social, economic and environmental implications. This includes the mobile's role in providing social and digital inclusion to communities; economic competitiveness by serving businesses in the area; and supporting sustainability objectives such as enabling homeworking, reducing transport congestion and greenhouse gas emissions.

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