SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Vaughan Way	Site Address:	Land at the junction of Vaughan Way and Knighten Street, Tower Hamlets, London, E1W 2PT
National Grid Reference:	534530, 180157		
Site Ref Number:	TOW2012	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: N/A – upgrade of existing site		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: N/A – upgrade of existing site		

Site specific pre-application consultation with local planning authority

Was there pre-application contact:	Yes	**No**
Date of pre-application contact:	N/A	
Name of contact:	N/A	
Summary of outcome/Main issues raised: A pre-application advice letter was sent to Tower Hamlets Council by email on 16 November 2020. No response has been received.		

Community Consultation

Rating of Site under Traffic Light Model:	Red	**Amber**	Green
Outline of Consultation carried out: Pre-application consultation letters were sent by email on 16 November 2020 to the St. Katharine's & Wapping Ward Councillors – Councillors Jones and Ullah.			
Summary of outcome/Main issues raised: No responses have been received.			

[1] Macro or Micro

School/College

Location of site in relation to school/college *(include name of school/college):* The site is close to the following establishments: • Hermitage Primary School – Vaughan Way – approximately 195 metres from the site. • John Orwell Sports Centre Holiday Club – Tench Street – approximately 70 metres from the site.
Outline of consultation carried out with school/college *(include evidence of consultation):* Pre-application consultation was sent to the establishments on 16 November 2021.
Summary of outcome/Main issues raised: No responses have 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 – Full planning application.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	N/A – full planning application.	

3. Proposed Development

The proposed site:
The application site is located to the rear of the footpath at the junction of Vaughan Way and Knighten Street. The area around the site is predominantly residential in character, however to the rear of the site (the east) is the car parking area of the John Orwell Sports Centre. The closest residential properties are located across Knighten Street from the site. There are trees, both close to the site and in the wider surrounding area, which provide a substantial degree of screening to the existing development. There is also an existing telecommunications base station to the north on Vaughan Way. The site sits on the boundary of the Wapping Pierhead Conservation Area and there is a Grade II listed building to the south of the site at 12-14 Pier Head. The photographs below show the existing equipment. The first photograph is looking along Vaughan Way towards the site. The monopole to be removed is the slimmer pole to the rear. The second photograph shows the site looking along Knighten Street. Both viewpoints confirm the substantial benefit of the tree screening in the area.

This application proposes to remove the existing monopole and replace it with a new 16 metre high monopole supporting 6 no. antennas, to provide 3G, 4G and 5G coverage to the surrounding area, along with coverage for its Three Broadband service, with replacement cabinets at ground level. The existing recycling bin is proposed to be moved as part of the development.

It is noted that pre-application correspondence was issued with drawings showing a 20 metre high monopole. The height has been reduced to a minimum due to its location close to residential properties and also heritage assets.

Type of Structure *(e.g. tower, mast, etc):*	*Monopole*
Description: The removal of the existing 15 metre high monopole and its replacement with a new 16 metre high monopole supporting 6 no. antennas and 2 no. dishes, the removal of an equipment cabinet and the installation of 3 no. new cabinets at ground level and ancillary development thereto.	
Overall Height:	16 metres
Height of existing building *(where applicable):*	N/A
Equipment Housings:	
Commscope Bowler Cabinet:	1.9m (width) x 0.6m (depth) x 1.752m (height)
H3G APM 3900 Cabinet:	0.6m x 0.48m x 1.4m
Meter Cabinet (Existing cab to remain):	0.38m x 0.18m x 0.87m
Wrap around cabinet:	2.0m x 0.7m x 1.54m
Materials *(as applicable):*	
Tower/mast etc. – type of material and external colour:	Steel with a black finish.
Equipment housings – type of material and external colour:	Steel with a black finish.

Reasons for choice of design:

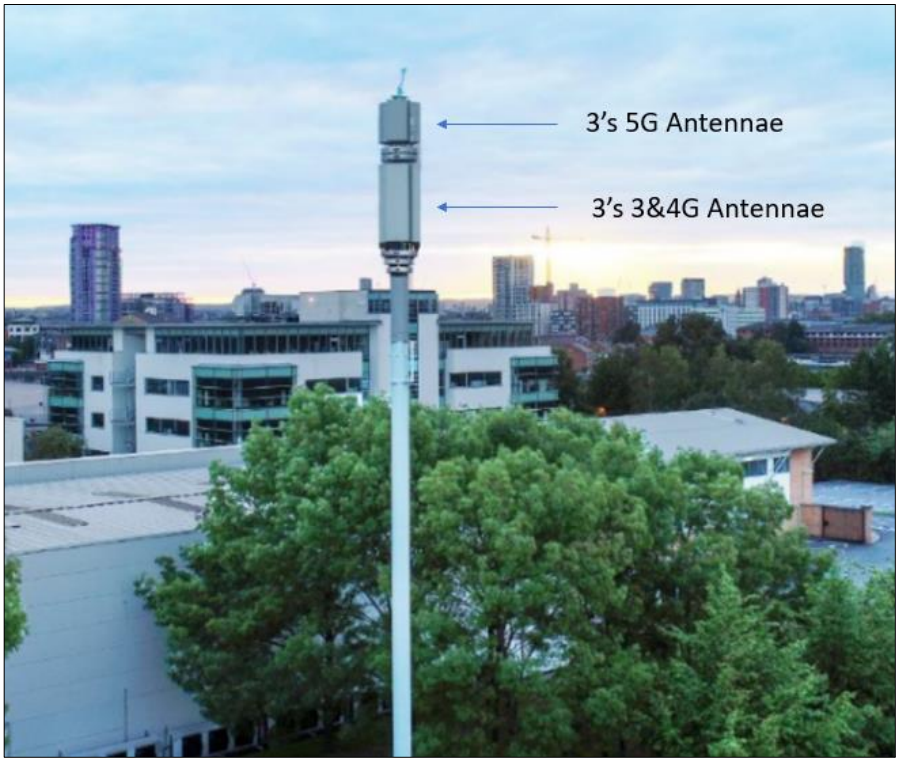
In designing the proposed upgraded installation, the applicant has sought to achieve a balance between the technical requirements of the Operator and minimising environmental impact as far as practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.

There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the links into the network either by fibre cabling or by dish antennas, power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

The application proposes to replace the existing monopole with a new, slightly, taller monopole, with a slim and unfussy appearance. The pole would support 6 no. antennas at the top of the pole (three antennas for 5G coverage at the top and the lower three providing 3G and 4G coverage), along with dishes to link the site into the network, and this would allow for an enhancement of the network services for H3G. The upgraded development would provide 3G, 4G and 5G coverage for H3G, as well as providing services for the Three Broadband service. This will ensure that the surrounding area will be at the forefront of the next advance in technology being deployed.

In terms of the height of the proposed structure, it is acknowledged it would be slightly taller than the existing monopole and the adjacent installations. This is necessary as the site is proposed to provide 5G services and 5G uses higher frequencies which do not propagate through material and potential obstructions as well as lower frequencies, thus there is a need to ensure that the antennas clear local clutter, in particular trees and buildings in the area. In addition, there are two sets of antennas proposed in a stacked formation, and the height of the pole is also needed to ensure the lower antennas propagate

effectively to the whole of the target area. The photograph of an existing site below illustrates the stacked formation of antennas:



New antennas are needed as the current antennas cannot provide the range of services and capacity that is required. A replacement monopole is required because the existing structure is not capable of supporting the required new antennas. A more substantial tower is needed as the 5G antennas are heavier than antennas providing 3G and 4G coverage. Although the replacement pole would be a taller and bulkier structure its additional impact would not be excessive, even taking into account its location on the boundary of a conservation area. The site is an existing communications base station and the site is adjacent to substantial trees, which would provide a significant level of screening to the upgraded development. The minimal additional impact of the development would be outweighed by the significant benefits of the proposal in terms of providing improved connectivity to the area.

In terms of the equipment cabinets, a greater number of cabinets are needed because of the increased range of services proposed to be provided by the site. It is not considered the cabinets would appear excessive.

Both the monopole and cabinets are proposed to be coloured black. The existing equipment is coloured black to match the street furniture in the area, and the replacement equipment is also proposed to be coloured black.

It is considered, overall, that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below). International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, H3G (UK) Ltd 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 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

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 improved connectivity and network enhancement to H3G in the area. 3G, 4G and 5G coverage will be deployed from the site providing enhanced connectivity to the area. Coverage for its Three Broadband service will also be provided from the site. The development forms part of the H3G national upgrade of its services.

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. To bring this new technology H3G will need to provide a mix of upgrades to existing sites and the building of new sites. New sites will be needed for many reasons, including that the higher radio frequencies used for 5G do not travel as far as those frequencies currently in use leaving gaps in the network.

Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas and ancillary equipment will be needed. It has been acknowledged by Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks. This is one of the many additional structures that will be needed to provide enhanced services.

The higher frequencies that 5G will use can provide more bandwidth and thus greater capacity but the signal will not travel as far as those of previous generations. The implications to the built environment will be that more infrastructure needs to be deployed.

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 H3G base stations are designed to be fully compliant with ICNIRP guidelines, and a certificate of compliance is included with the application.

Additional supporting information is included within the '3UK Information Document'. This provides background information on the '3' network, the evolution of mobile phones in the UK. It explains the ever-increasing demand for its network services, both currently and with future projections, explaining the need for this new development. It also provides information regarding the safety of the proposed equipment.

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
			N/A

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

Paragraph 113 of the revised National Planning Policy Framework, in which the Government's supportive stance towards developing high quality communications infrastructure is laid out, 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*."

The proposal is for works at an established communications site and not for the development of a new installation, thus the consideration of alternative sites is not appropriate. The applicant has examined its portfolio of sites in this region and determined that there are no alternatives in the area which can be upgraded to meet the specific technical requirement. The application site represents the only feasible option in this instance which allows the requirement to be met without the deployment of an additional base station in the locality.

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 enhanced coverage can be provided. The site is an existing and established communications installation, close to substantial trees which provide a significant level of screening to the existing development. The proposed upgraded development would also benefit from this siting.

It is acknowledged that the site would be visible, and that the area surrounding the site is a predominantly residential area. However, the specific siting of the installation ensures there would only be a minimal additional impact on the surrounding area. Whilst the equipment would be visible, visibility does not necessarily equate to harm, and it is considered the impact of the development would be not be excessive. The minimal footprint of the site and the substantial trees close to the site ensures impact is kept to an acceptable level. There is existing street furniture and the equipment is proposed to be painted black to match. Both visual and residential amenity would not be harmed.

The upgraded installation would provide 3G, 4G and 5G coverage for H3G, along with Three Broadband services. This accounts for the increase in scale of equipment required. An alternative would be to propose a separate installation for the new technology. Proposing a larger redevelopment of this existing site assists in keeping the overall number of installations to a minimum, and therefore also keeping the overall visual impact of development to a minimum.

As previously noted, the site lies on the fringe of the Wapping Pierhead Conservation Area and there is a Grade II listed building to the south of the site at 12-14 Pier Head. The site lies on the western edge of the conservation area designation. The main body of the designated area lies to the east of the site, and is protected by trees between the site and the conservation area. Any increase in scale would be minimal and not sufficient to harm heritage assets. The location was considered suitable when granted consent in 2014, and remains a suitable site. In respect of the listed building to the south, there are intervening

buildings and trees which ensure there would be a negligible additional impact. Any limited harm to heritage assets would be outweighed by the significant benefits of the proposal.

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 site or the surrounding area. The equipment would be visible, however its impact would not be excessive. On balance this proposed location is considered to be the optimum location in terms of siting and design, with the limited harm it may impose on the surrounding area being outweighed by the provision of enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2019) (NPPF)

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

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

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

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

*c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy*."

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

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

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Further to this, paragraph 38 states that "*Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants*

to secure developments that will improve the economic, social and environmental conditions of the area."

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

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

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

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

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

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

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 113 states that "*The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged*".

By upgrading an existing site to provide enhanced services for multiple technologies from a single installation, the proposal is in line with the above policy.

In terms of heritage assets, section 16 of the guidance deals with 'Conserving and enhancing the historic environment'. Paragraph 184 sets out that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 196 states: "*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."* It is considered there would be a less than substantial harm, being located on the fringe of a conservation area. It is an upgrade of an existing installation and the slim and unfussy design of pole, the colouring of equipment and significant screening from trees ensures that the limited harm to heritage assets would be outweighed by the significant benefits of the proposal.

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

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 as amended 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 Tower Hamlets Council, relevant to the proposal, comprises:

- The London Plan: Spatial Development Plan for Greater London;
- Tower Hamlets Local Plan 2031.

The London Plan

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

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

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

a. facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive broadband access meeting the needs of enterprises and individuals.

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

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

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

Local Plan

Most relevant to the proposal is policy D.DH11 of the Tower Hamlets Local Plan. For ease of reference the policy is copied below:

> *"1. The installation of new telecommunication apparatus is required to minimise its impact on the street scene and not unacceptably harm the appearance of heritage assets through appropriate design and:*
>
> *a. demonstrate that where a new site is proposed that co-location/ mast-sharing on existing sites has been explored and is not possible*
> *b. not create any unacceptable risks to the health and well-being of residents and users of surrounding and nearby sites, and*
> *c. not unacceptably detract from the amenity of surrounding properties."*

The proposed development conforms to this policy. The site utilises an existing installation which currently provides broadband coverage to the surrounding area. As part of the upgrade this broadband coverage will continue, therefore it is important to be in a location which can provide continued service. Although not sharing with another operator, there would be an enhanced range of services provided from the site, with additional 4G and 5G coverage for the '3' network. The alternative of proposing an additional installation to provide the enhanced coverage would have a far greater impact. A certificate is included with the application documents confirming the base-station would operate in accordance with ICNIRP guidelines, ensuring the health of residents remains protected. There would only be a minimal additional impact on residential and visual amenity. The scale of the installation would increase, however the site is set against a backdrop of trees ensuring impact is kept to an acceptable level.

Siting has previously been approved, therefore is considered appropriate. The design of the installation incorporates a slim and unfussy design of pole, however the specific circumstances of the development, with a need for the antennas to clear surrounding clutter, and the additional weightings of 5G antennas, results in a taller and more substantial pole. However, the location close to substantial trees, and other communications infrastructure and street furniture ensures the additional impact would be minimal. The increase in impact would be outweighed by the significant benefits of the proposal in terms of the improved connectivity to the surrounding area.

Policy S.DH3 (Heritage and the historic environment) is also relevant, with the site located on the fringe of a conservation area, and also relatively close to a Grade II listed building. The general aim of the policy is to preserve and enhance heritage assets within the borough. Whilst the scale of the installation is proposed to increase, this would be minimal with only a one metre height increase. Equipment cabinets are set against a wall where there are existing recycling bins, and there is a backdrop of trees. The less than substantial impact would be outweighed by the substantial benefits of the proposal.

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 improved connectivity and network enhancement to the area, with a minimal impact. This site achieves this aim. The proposed development is compliant with the NPPF. This siting and design are considered the most appropriate solution to providing the coverage requirements to the area.

The proposal is fully compliant with ICNIRP guidelines.

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