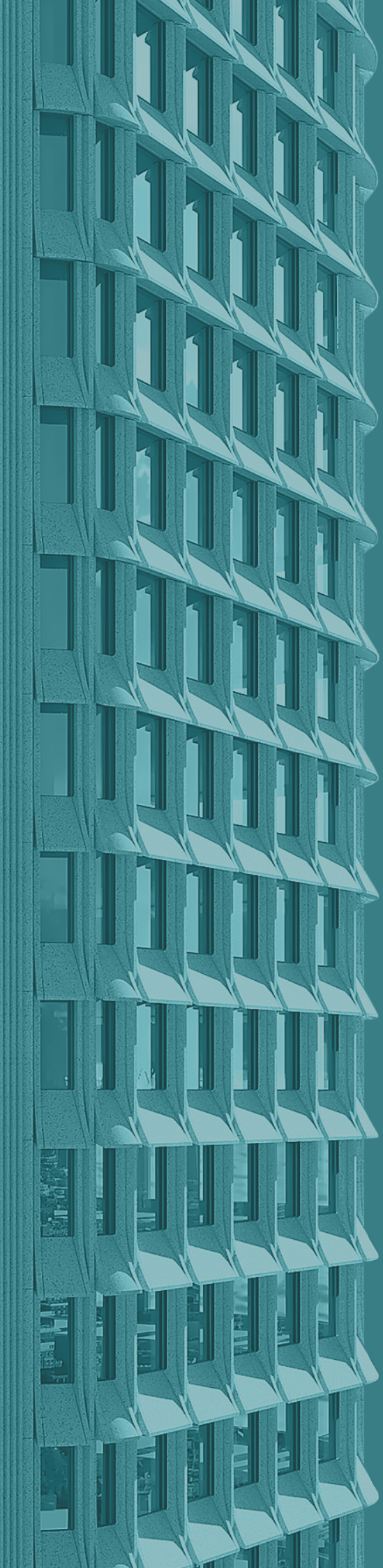

EUSTON TOWER

Telecommunications Report Addendum

December 2024

British Land

GTech Surveys Limited

Euston Tower

Telecommunications Report Addendum

Issue	Date	Details of Changes	
0.0	18/10/2024	Working draft	
0.1	20/11/2024	First draft issue	
1.0	28/11/2024	First issue - minor editing following review	
1.0	11/12/2024	Final issue - minor editing	
Author: G Phillips			Reviewer: O Lloyd

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GTech Surveys Limited

GTech Surveys Limited is a Midlands based broadcast and telecommunications consultancy conducting projects throughout the entire UK. We undertake mobile phone network, television and radio reception surveys (pre- and post-construction signal surveys), conduct broadcast interference and reception investigations, and support telecommunications planning work for wind energy developers, construction companies, architects, broadcasters and Local Planning Authorities.

In addition to radio interference modelling services and television reception surveys, we produce EIA and ES Telecommunications Chapters (also known as an 'Electronic Interference Chapter'); satisfying the requirements of Part 5, Regulation 18 (Parts 5a and 5b) of The Town and Country Planning EIA Regulations 2017. We peer review ES and EIA work, liaising with telecommunications providers (Arqiva, BT etc.) and advise developers with respect to associated Section 106 (Town and Country Planning Act 1990) and Section 75 (Town and Country Planning (Scotland) Act 1997) agreements.

GTech Surveys Limited is a consultant member of the Trade Association for Content Delivery - (Confederation of Aerial Industries Ltd - CAI) and the RDI - the digital sector's professional body and trade organisation. We are listed on Constructionline and verified as a Safety Schemes in Procurement (SSIP) member by Safety Management Advisory Services (SMAS), making us compliant with the industry standard PAS 91:2013 + A1:2017.

Professional broadcast trained project engineers deliver, and supply Markel (UK) insured technical products to support planning applications, discharge planning conditions (including S106 Agreements) and for due diligence. For more information about GTech Surveys Limited please visit our website - www.gtechsurveys.com

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1 - Introduction

This Telecommunications Report Addendum summarises the revisions made to the pending strategic application for Full Planning Permission (reference 2023/5240/P), submitted in December 2023 for the Proposed Development at Euston Tower (286 Euston Road, London).

The Applicant has undertaken extensive consultation during both the pre-application and determination stages of the Proposed Development and has sought to respond positively to the responses received. The scheme has been revised in response to feedback from Officers, local stakeholders and residents, the Regents Park Conservation Area Advisory Committee and statutory consultees, including Historic England and The Greater London Authority (GLA).

This Addendum has been prepared detailing the revisions to the pending scheme (the "Proposed Development"). For the avoidance of doubt, the Euston Tower Telecommunications Report which accompanied the December 2023 Submission is considered as read and this Addendum deals only with the 2024 Revisions and any updates to assessments as a result of these revisions. This Addendum also clarifies and provides further details responding to consultation responses received since the original submission in December 2023. Save where varied or supplemented in this Addendum, the content of the Euston Tower Telecommunications Report remains valid and up to date.

The Description of Development for the Proposed Development, in light of the 2024 Revisions, has been updated to the following:

> *Redevelopment of Euston Tower comprising retention of parts of the existing building (including central core, basement and foundations) and erection of a new building incorporating these retained elements, to provide a 32-storey mixed-use building providing offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and Enterprise space (Class E/ F) at ground and first floors, and associated external terraces; public realm enhancements, including new landscaping and provision of new publicly accessible steps and ramp; short and long stay cycle storage; servicing; refuse storage; plant and other ancillary and associated work.*

It should be noted that the no design changes have been made which could significantly alter the overall outcomes of the December 2023 assessment, primarily that there has been no change to the overall tower height and that the podium height has only increased by two levels (from four to six (L00-L05)). This relatively minor increase in podium height has no influence on any of the various technologies that were considered for the December 2023 submission. Consequently, it is considered that the findings of the December 2023 submission remain valid for the 2024 Revisions.

This study was undertaken during November 2024 to reassess the impacts that were identified in the December 2023 submission.

This report follows the following structure:

Chapter 1 - introduces the work, the December 2024 Amendments to the Proposed Development and the format of the assessment

Chapter 2 - discusses any changes in planning policy relative to the assessment

Chapter 3 - provides a summation of the possible impacts and effects that were identified in the December 2023 application

Chapter 4 - describes any new or different identified impacts on the technologies considered in the assessment as a result of the December 2024 Amendments to the Proposed Development

Chapter 5 - describes any suitable mitigation measures for any affected receptor

Chapter 6 - presents the conclusion

2 - Planning Policy Context

Since the December 2023 submission, The National Planning Policy Framework (NPPF), December 2023 (Department for Levelling Up, Housing and Communities) has been updated. However, no revisions are applicable for consideration in this Addendum.

No changes have been made to any other adopted regional or local policy considered for the December 2023 submission.

Emerging Planning Policy

With respect to emerging policies, London Borough of Camden (LBC) consulted on the draft new Local Plan from 17 January to 13 March 2024. The draft new Camden Local Plan sets out the council's vision for future development in Camden for the next 15 years and includes the planning policies and site allocations to help achieve this. It identifies how many new homes and jobs are needed to support Camden's population, and where and how they should be provided. The Local Plan also has an important role in shaping how Camden's places look and feel, promoting inclusion, reducing inequality, enhancing the environment, tackling climate change and securing sustainable neighbourhoods.

Local Plan policies on the economy aim to maximise opportunities for Camden residents, businesses and the voluntary sector to contribute to and share in the Borough's economic growth. In Policy IE1 (Growing a successful and inclusive economy), it is stated that;

> *A. To secure a strong, diverse, sustainable and inclusive economy in Camden, and maximise opportunities for the borough's residents, businesses and voluntary sector to contribute to and share in the success of Camden's economy, the Council will:*
>
> *xi. expect developers to provide high-speed, reliable digital connectivity to support occupiers*

To aid developers, further details can be found in Supplementary planning documents, in particular, Camden Planning Guidance, Digital Infrastructure March 2018[1].

20 November 2024, The Greater London Authority (GLA) published the Digital Connectivity Infrastructure (DCI) London Plan Guidance (LPG)[2] which is intended to provide practical guidance, from the initial pre-application and design stages and throughout the planning application process. The LPG seeks

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1 - https://www.camden.gov.uk/planning-policy-documents

2 - https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/digital-connectivity-infrastructure-guidance

to improve digital connectivity infrastructure delivery through the planning system across London for both new and existing development proposals and one that is better supported through plan-making functions in boroughs. The LPG also supports applicants, local planning authorities (LPAs), developers, telecommunications industry operators and their consultants, community groups, and others.

In line with London Plan Policy SI6 (Digital connectivity infrastructure), the developer will commit to the provision of full fibre connectivity infrastructure to ensure future tenants have robust future-proof and reliable digital connectivity infrastructure. The provision of high quality digital connectivity infrastructure in new development will contribute to London's global competitiveness.

3 - Predicted Impacts and Effects

The following predicted impacts (and suitable mitigation for completeness) were identified in the December 2023 application and are summated in Table 1.

Broadcast platform	Area(s) of predicted interference	Risk of interference & reasoning	Mitigation
Digital Satellite TV (Freesat and Sky)	Longford Street, Drummond Street, Stanhope Street, William Road, and other closes and roads off these streets	The use of tower cranes is likely to cause disruption to digital satellite television reception in areas to the northwest of tower crane bases	Moving dishes to new locations where interference does not occur. Alternatively, the use of DTT receiving equipment or television broadcasts via broadband or cable

Table 1 - Summary of Predicted Interference during the Construction Period

Predicted Effects - Conclusions

It was considered that whilst the Proposed Development itself would not cause any disruption to the reception of digital satellite television services, the use of tower cranes during the construction phase may cause disruption for digital satellite television viewers to the immediate northwest of the Site, including Longford Street, Drummond Street, Stanhope Street, William Road, and other closes and roads off these streets. In these locations, tower crane operations could cause sporadic interference effects to the reception of digital satellite television services.

4 - Revised Predicted Impacts and Effects

It should be noted that the no design changes have been made which could significantly alter the overall outcomes of the December 2023 assessment, primarily that there has been no change to the overall tower height and that the podium height has only increased by two levels (from four to six (L00-L05)).

Possible impacts to digital satellite TV reception were considered as a result of tower crane use. As tower cranes will still be used during the construction period, the same possible impacts are likely. Table 2 summates the possible impacts. Since the December 2023 application, technologies have also evolved, resulting in additional mitigation solutions which have been suggested.

Broadcast platform	Area(s) of predicted interference	Risk of interference & reasoning	Mitigation
Digital Satellite TV (Freesat and Sky)	Longford Street, Drummond Street, Stanhope Street, William Road, and other closes and roads off these streets	The use of tower cranes is likely to cause disruption to digital satellite television reception in areas to the northwest of tower crane bases	Moving dishes to new locations where interference does not occur. Alternatively, the use of DTT receiving equipment or television broadcasts via broadband or cable. Digital satellite television services are also available on smart TV via applications (apps) which do not require a satellite dish in order to operate.

Table 2 - Summary of Predicted Interference during the Construction Period

Predicted Effects - Conclusions

Whilst the Proposed Development itself will not cause any disruption to the reception of digital satellite television services, the use of tower cranes during the construction phase may cause disruption for digital satellite television viewers to the immediate northwest of the Site, including Longford Street, Drummond Street, Stanhope Street, William Road, and other closes and roads off these streets. In these locations, tower crane operations may cause sporadic interference effects to the reception of satellite television services.

Should satellite dishes be located in this area (especially located on residential properties), repositioning satellite dishes to new locations where views of the south-eastern skies are no longer obscured should restore reception for any affected receptor. If satellite dishes cannot be relocated out of any signal

shadow zone, the use of DTT receiving equipment or TV over fibre / broadband services could also offer viewers alternative sources of broadcasts. The majority of TV broadcasts can now be viewed via apps on suitable smart TV. The use of app on a smart TV will also remove the need for a satellite dish altogether because the content is delivered by broadband / fibre to the television set.

If any satellite dish relocating is required, it is advised that a professional registered antenna installer conducts all required work, as further detailed in Chapter 6.

Overall, it is considered that the possible impacts as identified in the December 2023 submission are identical to the December 2024 Amendments to the Proposed Development.

5 - Mitigation Measures

For any affected digital satellite television viewers located to the northwest of the Site (in particular on Longford Street, Drummond Street, Stanhope Street, William Road, and other closes and roads off these streets), relocating satellite dishes to new locations where required clear views to the southeast horizon are no longer obscured by the tower cranes, could restore the reception of services. Affected digital satellite television viewers could also use DTT reception equipment to restore reception. In addition, affected digital satellite television viewers could also use TV over IP / fibre, applications (apps) on smart TVs (Freesat App, BBC iPlayer etc.), broadband or cable reception equipment to provide alternative sources of TV broadcasts.

These are common mitigation solutions suggested for similar situations where local satellite television reception conditions have been adversely affected by adjacent construction work. A registered installer should be able to advise on the most effective mitigation measures once the existing installed antenna system has been inspected and construction-generated interference has been identified.

It is recommended that all antenna work (satellite dish moving, relocating etc.) is undertaken by a registered installer (Confederation of Aerial Industries (CAI) accredited[3]) and any system components used must be CAI benchmarked. More information regarding the CAI can be found on the CAI's website[4].

The CAI's benchmarking scheme ensures that the cables and antennas have passed minimum requirements for the use of DTT and digital satellite television reception. The use on non-benchmarked products in an antenna system would degrade overall performance and effectiveness of the system, increasing the risk from interference. More information on CAI benchmarked products can be found on the CAI's website[5].

3 - https://www.getmeviewing.org.uk/

4 - http://www.cai.org.uk/index.php

5 - https://www.cai.org.uk/index.php/services/product-certification-scheme

Complaints Procedure and Investigation of Television Interference

To enable the interference reporting process, contact details / phone numbers will be displayed on the hoarding surrounding the Site, should any local resident wish to discuss television interference (or any other construction matter) with the developer.

If reports of television interference are received, a procedure is required to enable the developer to determine the validity of a claim and to understand the extent of the potential interference problem. It is recommended that the following information is recorded for any reports of interference. If clusters or patterns of interference form, such data would quickly enable an investigation to take place and will greatly decrease the time taken to resolve the matter.

Based on information received from the developer, an initial investigation would be carried out to validate the claim. For an expert to undertake this, the developer is required to log any complaints and the operational times and dates of any tower crane use. In addition, the complainant could complete the TV Interference Questionnaire, or a similar form (as presented in the Appendix I - *Television Signal Survey Questionnaire*).

The log should contain the following as a minimum;

- *full contact details of the complainant (name, address, contact number etc.)*
- *a physical description of the interference (sporadic, constant, digital interference effects (loss of sound, green blocking on received images etc.) and identifying which TV sets are affected*
- *if satellite television reception has been affected (this would include FreeSat and Sky)*
- *the dates and the times of day when interference is noticed*
- *the channels the interference affects (particularly important for DTT services)*
- *when the interference was first noticed (time and date)*

This information would then be assessed through the findings of this report to validate any claim or claims. Previous experience has shown that most reports of interference have been down to either; user error with equipment; damaged or incorrectly set up receiving equipment; or confusion regarding domestic technical appliances. Most reception problems can be resolved with simple technical advice. However, if a pattern of interference emerges that corresponds with any theoretical or predicted impacts, or if clusters of interference have formed within the study area, further field investigations may be required.

If the complaints are found to be valid, the developer will employ the services of a local, registered aerial installer (for example, a Confederation of Aerial Industries member) who will remedy the identified impairment. A registered antenna installer should be able to advise on the most effective mitigation measures once the existing installed antenna system has been inspected and development or construction-generated interference has been identified.

Interference reduction during the Construction Phase

It should be noted that because tower cranes are normally taller than the structures being built and tower cranes operate over a wide area, moving satellite dishes to different locations may not resolve all reception issues encountered during the construction phase. To reduce tower crane interference, it is advised that the crane jibs / arms are positioned (in free slew) in a northwesterly to southeasterly aligned orientation at the end of crane lifting operations, hence reducing the overall crane cross-sectional area presented to the incoming satellite signals. This action reduces interference because the signals come in at a bearing of 145 degrees with respect to true north (for Freesat and Sky digital satellite television services), and so encounter less of the crane's structure if parallel to the direction of the incoming satellite signals.

6 - Conclusions

This Telecommunications Report Addendum summarises the revisions made to the pending strategic application for Full Planning Permission (reference 2023/5240/P), submitted in December 2023 for the Proposed Development at Euston Tower (286 Euston Road, London).

No design changes have been made which could significantly alter the overall outcomes of the December 2023 assessment, primarily that there has been no change to the overall tower height and that the podium height has only increased by two levels (from four to six (L00-L05)). This relatively minor increase in podium height has no influence on any of the various technologies that were considered for the December 2023 application. Overall, it is considered that the possible impacts as identified in the December 2023 application are identical to the December 2024 Amendments to the Proposed Development. Overall, some impacts to the reception of digital satellite television (such as Freesat and Sky) are possible arising from the use of tower cranes which will be used during the construction phase of the Proposed Development.

Digital Satellite Television - Freesat and Sky

The use of tower cranes during the construction phase is likely to cause disruption to the reception of digital satellite television services in areas to the immediate northwest of the Site; on Longford Street, Drummond Street, Stanhope Street, William Road, and other closes and roads off these streets. If interference does occur, the repositioning of satellite dishes to locations without an obscured line-of-sight view to the serving satellites should restore reception. If this is not possible, the use of DTT receiving equipment would also offer any affected viewer an alternative source of digital television broadcasts. Any sporadic interference arising from tower crane use is expected to be limited in duration (only occurring during periods when the cranes are erected) and will cease completely when the cranes are taken down.

In addition, affected digital satellite television viewers could also use TV over IP / fibre, applications (apps) on smart TVs (Freesat App, BBC iPlayer etc.), broadband or cable reception equipment to provide alternative sources of TV broadcasts. These do not require the use of a satellite dish.

These are standard and easy to adopt mitigation solutions in situations where construction work has degraded local television reception conditions.

If the complaints are found to be valid, the developer will employ the services of a local, registered aerial installer (for example, a Confederation of Aerial Industries member) who will remedy the identified impairment. A registered antenna installer should be able to advise on the most effective mitigation measures once the existing installed antenna system has been inspected and development or construction-generated interference has been identified.

This Addendum has been prepared detailing the revisions to the pending scheme (the “Proposed Development”). For the avoidance of doubt, the Euston Tower Telecommunications Report which accompanied the December 2023 Submission is considered as read and this Addendum deals only with the 2024 Revisions and any updates to assessments as a result of these revisions. This Addendum also clarifies and provides further details responding to consultation responses received since the original submission in December 2023. Save where varied or supplemented in this Addendum, the content of the Euston Tower Telecommunications Report remains valid and up to date.

Appendices

Appendix I - Television Signal Survey Questionnaire

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Television Signal Survey Questionnaire

Contact details *please highlight (in bold or circle) your required method of contact*

Name:

Address (inc. postcode):

Telephone: Mobile:

Email:

About your TV Signal

What provides the signal to the television set(s) in your home?

- ☐ Digital Satellite (Sky/Freesat)
- ☐ Digital Terrestrial (Freeview)
- ☐ Cable/Broadband (BT/Virgin Media)

Which of these rooms do you have a television set in?

- ☐ Lounge
- ☐ Dining room
- ☐ Kitchen
- ☐ Bedroom 1
- ☐ Bedroom 2
- ☐ Bedroom 3
- ☐ Bedroom 4
- ☐ Bedroom 5
- ☐ Other
  *Please specify*_____
  _____

Which of these television sets have been affected by interference since (or during) the building's construction?

- ☐ Lounge
- ☐ Dining room
- ☐ Kitchen
- ☐ Bedroom 1
- ☐ Bedroom 2
- ☐ Bedroom 3
- ☐ Bedroom 4
- ☐ Bedroom 5
- ☐ Other

*Please specify*_____

_____

What interference have you been experiencing?

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

When does this happen?

- ☐ Daytime
- ☐ Night time

How often does this happen?

- ☐ Daily
- ☐ Weekly
- ☐ Monthly
- ☐ Yearly

What channels are affected?

_____
_____
_____
_____

When did you first notice the interference?

_____
_____
_____
_____

Please feel free to add any additional comments

Signature:..... Date:.....

DISCLAIMER

This Report was completed by GTech Surveys Limited on the basis of a defined programme of work and terms and conditions agreed with the Client. We confirm that in preparing this Report we have exercised all reasonable skill and care taking into account the project objectives, the agreed scope of works, prevailing site conditions and the degree of manpower and resources allocated to the project.

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This Report is issued in confidence to the Client and GTech Surveys Limited have no responsibility to any third parties to whom this Report may be circulated, in part or in full, and any such parties rely on the contents of the report solely at their own risk.

The UK's terrestrial television and radio networks are highly complex engineering systems and are constantly being modified, re-designed, upgraded and maintained. The reception conditions detailed in this report were those prevailing at the time of the survey in the study area. Engineering work at transmitter sites, weather conditions and the time of the year will influence the quality and coverage of terrestrial services and their susceptibility to interference. Whilst every effort was made to accurately measure and assess the available television and radio transmissions and services at the time of the survey, GTech Surveys Limited cannot assume that any part of the television or radio broadcast network or transmission from any transmitter was operating in required specification or correctly to any design criteria. The signal measurements undertaken during the survey work were used to define the possible impacts to television and radio reception for this project. Although best practice has been applied in understanding the potential impacts, due to the complex nature of the subject, GTech Surveys Limited is not accountable in anyway whatsoever if unpredicted impacts occur at any location anywhere in the study area.

Modelling parameters assume that all installed UHF antenna systems are mounted at least 10m AGL and installed to a modern standard, with all components meeting CAI quality standards. Antennas mounted at lower heights and poor-quality installations will be more prone to the effects of interference from external sources and as such, reception conditions to installations with the aforementioned characteristics have not been accounted for in any impact modelling. Consequently, properties with such installations may be prone to interference effects that have not been identified. Such installations are commonly found in camping and caravan parks, on bungalows and properties where it is not possible to attach an antenna to the exterior roof. Antennas mounted in lofts are also more prone to interference effects arising from the signal attenuation caused by roofing materials. Again, reception conditions to properties with the aforementioned antenna installation characteristics have not been accounted for in any impact modelling and as such, properties with these installations may be prone to interference effects that have not been identified.

Digital terrestrial television (Freeview) coverage may vary as a result of engineering works or any frequency changes authorised by Ofcom. We advise that consumers always check future reception predictions (http://www.digitaluk.co.uk/coveragechecker/) before buying TV equipment. GTech Surveys Limited, Ofcom and Digital UK are not responsible for household TV reception arrangements.

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Any questions or matters arising from this Report should be addressed in the first instance to the Project Manager.