

## The full set of remedies sought in Section 5 of the submission expressed in the positive

1. Alter the NPPF to affirm the competent authority status of Local Authorities.
2. Resource LPAs/LAs to perform as regulators of RFR exposure.
3. Acknowledge the primacy of the public exposure procedural standard within the EECC.
4. Alter all policies and practices to reflect that material planning considerations arise from EECC public health/environmental provisions.
5. Determination of whether the EECC public health provisions is 'where' Matt Warman considered LPAs/LAs operated as EECC competent authorities.
6. Introduce Telecom specific Environmental Impact Assessments.
7. Acknowledge that LPAs/LAs EECC competent authority status is made direct by EECC Recital 22.
8. Acknowledge that the EECC is the only legal framework for '*in situ*' decision making re RFR public and environmental exposure.
9. Acknowledge that LPAs/LAs multi-factorial decision-making demand cognisant, attuned, and responsive decision-making to balance policy, procedural requirements and compliance with legal obligations.
10. Clarify that public/citizen direct rights arise when LPA/LA make decisions on mast/antennas siting and small cell deployment.
11. Set objectives and criteria (EECC Recitals 21 and 121) for the protection of public health/environmental effects.
12. Clarify significance of answers regarding the LPA/LA competent authority from Matt Warman to Wera Hobhouse (DDCMS) and lack of response by the DLUHC to Solihull MBC.
13. Confirm the "weighting" of evidence as part of the EECC procedural standard, presented by DLA PIPER in August 2019.
14. Confirm that the "efficient management of the spectrum" requires LPA/LA EECC competent authority status to be applied effectively.
15. Confirm the *Wells v Secretary of State for Transport, Local Government and the Regions* (2004) is a comparable '*of a kind*' case to the case made in this Schedule 8, paragraph 35(9) submission.
16. Confirm that the case is significant regarding the incomplete transposition of the EECC
17. Protect citizen rights via a complete transposition of EECC in line with transposition guidance.
18. Resource LPAs/LAs to fulfil the EECC 'public health imperative' and distinguish between 'inevitable nuisance' and 'avoidable nuisance'.
19. Provide clarity on the government's on-going responsibilities when it delegates public health/environmental regulatory functions to LPAs/LAs.
20. Require LPAs/LAs to perform Telecommunication specific EIAs to fulfil EECC Recital 106 re mast siting.
21. Require LPAs/LAs to perform Telecommunication specific EIAs to fulfil EECC Recital 105 re: small cell deployment.