

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Highgate Mansions	Site Address:	Highstone Mansions, 84 Camden Road, Camden, London, NW1 9DY
National Grid Reference:	529173, 184106		
Site Ref Number:	208257 21	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: No register exists.		
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:	No
Date of pre-application contact:	N/A
Name of contact:	N/A

¹ Macro or Micro

In the first instance, all correspondence should be directed to the agent.

Cornerstone Industry Site Specific Supplementary Information (England) V.5 – 21.03.2022

Summary of outcome/Main issues raised:

Pre-application correspondence was forwarded to the London Borough of Camden by email on 26 May 2023.

To date no response has been received.

Annual area wide information to planning authority

Has annual area wide information been provided?	Yes – February 2022
If no explain why:	N/A
Summary issues raised:	N/A

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
<p>Outline of consultation carried out:</p> <p>Consultation was sent by email on 26 May 2023 to the following Stakeholders:</p> <ul style="list-style-type: none"> Camden Town Ward Councillors – Cllrs. Callaghan and Cotton. Member of Parliament for Holborn and St Pancras – Kier Starmer <p>Letters were also sent to the following residential properties by post:</p> <ul style="list-style-type: none"> Flats 1-63 Highstone Mansions, 84 Camden Road, London NW1 9DY Flats 1-46, 37 Camden Road, London, NW1 9LR Flats 1-6, 39 Camden Road, London, NW1 9LR 43-45, Camden Road, London, NW1 9LR 41A, 41B, 41C, 41D Camden Road, London, NW1 9LR 82 Camden Road, London, NW1 9DU <p>A total of 122 properties were consulted.</p>			

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Cornerstone Telecommunications, Infrastructure Limited,
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Registered in England & Wales No. 08087551.
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Summary of outcome/main issues raised (include copies of relevant correspondence):

There have been two responses, from the owners of the building and from a resident of 37 Camden Road, the residential building opposite the site.

The owners of the building have objected to the proposed development. The response from the resident of 37 Camden Road, received on 1 June 2023, raised queries regarding the size and scale of the proposed development, details of the construction of the installation and also health and safety issues. A reply was sent replying to these queries, and a further response was received on 8 June confirming: *"Thank you very much for the detailed response, really very helpful. We don't object per-se, but wanted further clarification of the plans - and the further documents are very helpful to see."*

No further responses have been received.

School/College

Location of site in relation to school/college (include name of school/college):

There are no schools close to the site. The closest is St Michael's CofE Primary School on Camden Street, which is approximately 230 metres from the application site.

Outline of consultation carried out with school/college (include evidence of consultation):

Due to the distance involved, and as it is not in a direct line of sight of the application site, no consultation was undertaken.

Summary of outcome/main issues raised (include copies of main correspondence):

N/A

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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

<p>The proposed site:</p> <p>The host building is a seven-storey building which is located on the eastern side of Camden Road, immediately north of the Regents Canal. The ground floor of the building is in commercial use, with residential properties above. The surrounding area has a mixture of uses, with further residential property and commercial premises, along with leisure uses and offices. The building is not listed, however is located within the Regents Canal Conservation Area.</p> <p>The proposal involves the installation of 6 no. additional pole-mounted antennas on the roof of the building, along with 2 no. transmission dishes and 2 no. equipment cabinets. The equipment would provide 3G and 4G coverage and capacity for the VMO2 network (trading as O2), along with new 5G coverage. A photograph of the host building is included below:</p>
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It is noted that there has been a previous planning application to install telecommunications apparatus on this building (application reference 2020/1732/P). This application was treated as withdrawn by the LPA due to the lack of activity on the file. This previous application sought consent for 12 no. antennas, 2 no. transmission dishes and 3 no. equipment cabinets. Therefore this new application has reduced the number of proposed antennas from 12 to 6, and the number of cabinets from 3 to 2, thus significantly reducing the impact of the proposed development.

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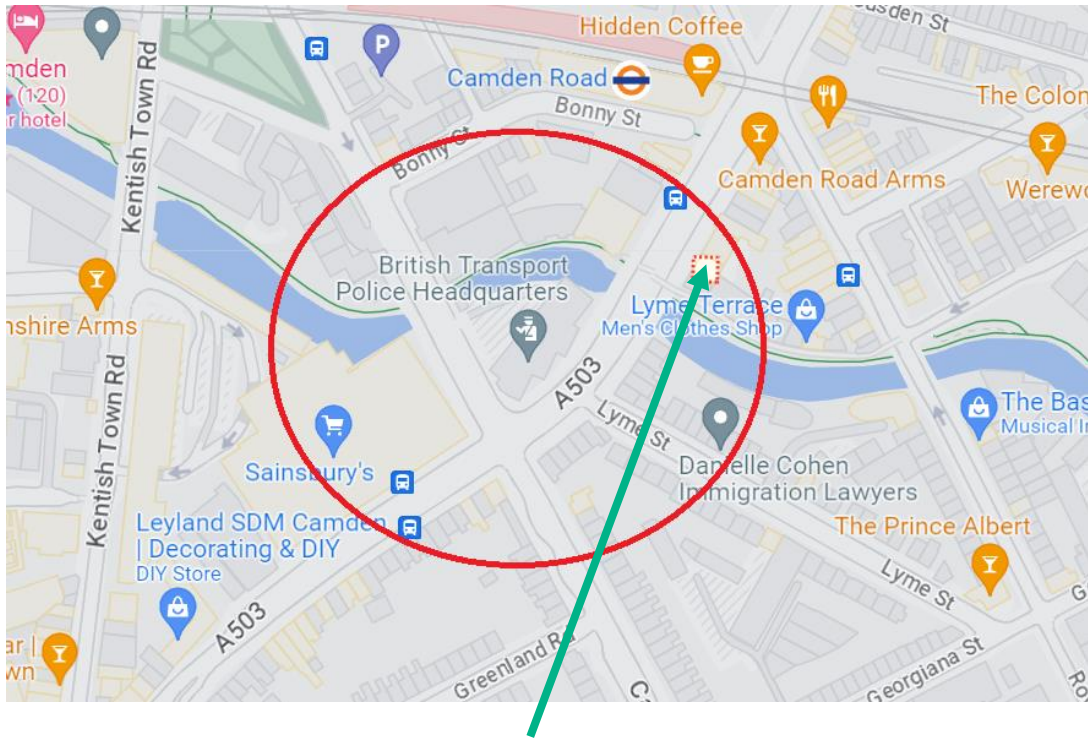
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Enclose map showing the cell centre and adjoining cells if appropriate:

The proposed site is required to provide the necessary level of coverage and capacity to this area of Camden. The search area for the proposed new installation is shown below (along with the proposed site location):




The application site is located within the search area, and it would fit successfully within the existing mature network of sites in the area. Without the proposed site VMO2 will be unable to provide a quality service that is required for its customers, resulting in customers receiving a poor level of service, including experiencing very low data rates and dropped calls.

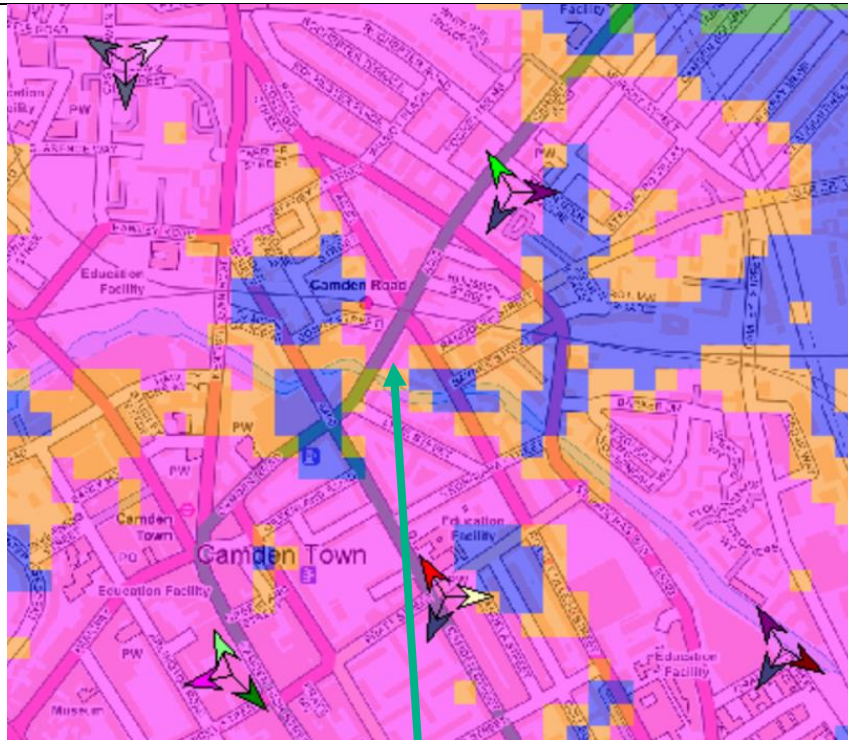
The coverage plots below shows the existing and proposed 4G coverage in the area, with the plots also showing surrounding sites and the site location highlighted:

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Existing VMO2 4G coverage




Proposed VMO2 4G coverage

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Ideal coverage levels for this busy area of London, to provide an adequate level of coverage and capacity to meet demand are shown as pink on the plots. The first plot confirms that levels fall below the required level, however the proposed plot confirms that the site would improve coverage to good levels. In addition, the site is also needed to provide new coverage and capacity for the latest 5G technology.

These are also attached as a separate item within the application documents. The Radio Planner has summarised the requirement for the site as follows:

“VMO2 require site 78560 to provide coverage and capacity to this busy residential area of Camden, the new site will bring improved coverage to customers in the area as well as much needed capacity as surrounding sites struggle to provide the required data rates in the area.”

Type of Structure (e.g. tower, mast, etc):	Rooftop	
Description:	The installation of 6 no. antennas, 2 no. 300mm transmission dishes and 2 no. equipment cabinets on the roof of the building and ancillary works thereto.	
Overall Height:	23.5 metres (to top of antennas)	
Height of existing building (where applicable):	20.2 metres (main roof level)	
Additional Equipment Housings:		
Length:	0.75m/ 0.70m	
Width:	0.6m/ 0.75m	
Height:	1.975m/ 1.8m	
Materials (as applicable):		
Tower/mast etc – type of material and external colour:	N/A	
Equipment housing – type of material and external colour:	Steel with a grey finish.	

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

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

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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 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.

In all aspects of the design now put forward the level of equipment and the smallest practical components have been utilised to ensure that the visual impact of the development is kept to the absolute minimum. The height of the proposal was determined by the network radio planners as being the minimum at which adequate enhanced coverage to the target area could be achieved. Specifically, the antennas need to be high enough to ensure the signal from the antennas will propagate effectively above the buildings in the local area.

There are severe limitations to locating equipment on the roof of a building. There are only two main options when deciding where to locate the required antennas. The antennas could potentially be located centrally on the building, utilising a stub tower, or they could be located towards the edge of the building. In the case of this application three sets of two antennas are proposed at the edge of the building.

The Rooftop Deployment Constraints and Solutions document, included as part of the application, provides more detail on this issue. With the stub tower option (scenario 2) it confirms that a much higher structure would be needed, thus having a greater overall impact on the host building and the surrounding area. Whilst the antennas would still be visible with the application scheme, the overall height of the antennas can be kept to an absolute minimum.

In terms of the antennas that are proposed, three of these are to provide 5G coverage and the remaining three are to provide 3G and 4G coverage. It is noted that the antennas to provide 5G coverage are much shorter than traditional antennas, this assisting in keeping the impact of the development to a minimum. Also mitigating the impact is the location of the equipment cabinets set back from the edge of the roof and set against a plantroom. The cabinets would not be visible from ground level.


As previously noted, there has been a previous planning application to install telecommunications equipment on the roof of the building. The previous application proposed to install 12 no. antennas, 2 no. dishes and 3 no. cabinets on

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the roof of the building. Therefore, this current proposal significantly reduces the level of equipment, and this would, in turn, reduce its impact on the host building and the surrounding area. Impact on heritage assets would be reduced, and it is considered this minimal impact would not cause an unacceptable level of harm to the surrounding area.

Overall, it is considered that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact on visual amenity or on heritage assets. The minimal impact would be outweighed by the significant public benefits of the proposal.

The development would provide enhanced 3G and 4G coverage and capacity for the VMO2 network, along with improved 5G provision for the area. It is noted that the equipment would be visible, however visibility does not necessarily equate to harm. Setting the significant benefits of the proposal against the limited harm, the benefits outweigh the minimal harm.


Technical Information

	Yes	No
<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)</p> <p>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.</p> <p>When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, VMO2 operates its network in such a way the radio</p>		

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frequency power outputs are kept to the lowest levels commensurate with effective service provision.

As part of VMO2'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.

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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 proposal would provide the VMO2 network with enhanced 3G and 4G coverage and capacity to the surrounding area, and also new 5G coverage.

The first generation of services provided voice calls, the second generation (2G) allowed basic data such as texting and the third generation (3G) offered internet access and the development of apps. Since then, the smart phone has developed further, and the fourth generation has brought video and much faster data speeds allowing the integration of the smart phone into wider use.

The next generation of mobile telephony is 5G which brings greatly increasing data speeds. The advantages this presents range from near-instant downloads of HD films to connected cars, smart medical devices and smart cities. To bring this new technology a mix of upgrades to existing sites and the building of new sites is required. 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 installations 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, as in this case.


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.

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A recent letter from Matt Warman MP, the minister for Digital Infrastructure, to English Local Authority Chief Executives, has re-affirmed the importance of digital connectivity. The letter dated 24 May 2021 notes: *'Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data 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...The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliant on mobile connectivity.'*

The following examples below illustrate practical applications of 5G Connectivity:

Education:

The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

Health:

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

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-

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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 O2 as well as the UK's 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*".

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,*

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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 VMO2 base stations are designed to be fully compliant with ICNIRP guidelines, and a certificate of compliance is included with the application. In addition, a document entitled 'Mobile UK Health Fact Sheet' is included with the application documents. This provides a simple explanation of 5G and the equipment behind it, including the antennae and the masts, in particular in relation to health issues. Further information is attached in the form of the attached 'Public Benefit of mobile connectivity' brochure.


Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.

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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 Type	Site name and address	National Grid Reference	Reason for not choosing site
1 - RT	British Transport Police HQ, 25 Camden Road, London, NW1 9LN	529105, 184067	Although suitable in terms of the coverage it would provide, this building is not available as the access requirements to the roof area both during the construction and operational phase would present unacceptable security risks.
2 - RT	37 Camden Road, London, NW1 9LR	529145, 184135	The roof of this building is entirely covered with solar panels. There is no space available to accommodate the required telecommunications equipment and the site has been discounted on this basis.
3 - RT	47 Kentish Town Road, London, NW1 8QG	528931, 184195	This site is too far to the west of the target area to provide the required level of coverage and has been discounted on this basis.
4 - RT	140-146 Camden Street, Camden Town, NW1 9PF	529085, 184134	The northern section of the development has an unsuitable roof to support the required equipment. In addition, coverage to Camden Road would be blocked by buildings to east. The site cannot therefore provide the necessary levels of coverage to the target area and has been discounted on this basis.
5 -RT	Lawford Wharf, Lyme St, London, NW1 0SF	529208, 184057	This building has been assessed and the roof is unsuitable for the installation of equipment, having a green roof, and for the most part

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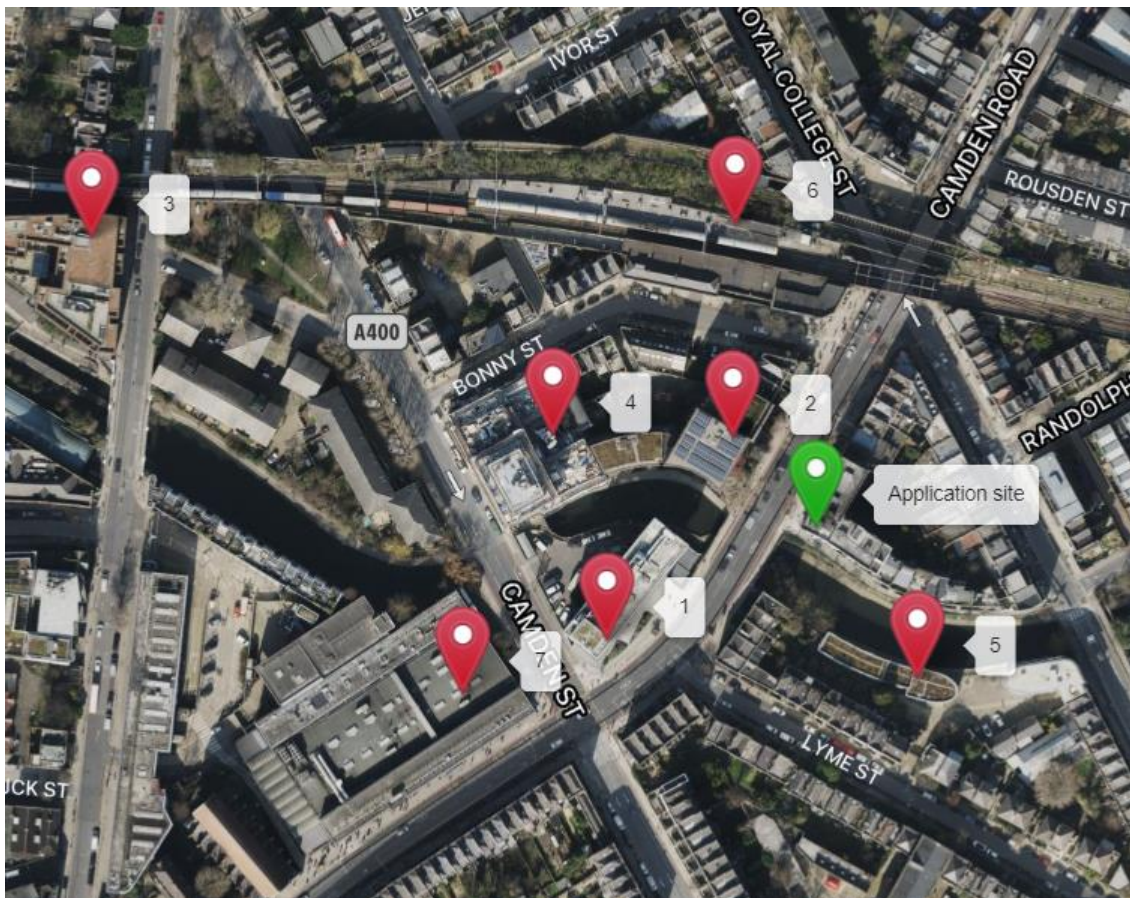
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			too low to provide the height required.
6 -RT	Camden Road Station, London, NW1 9LS	529144, 184205	The building is listed, and the applicant has assessed that unacceptable harm to the fabric of the building would result from the proposals and that therefore they are unacceptable.
7 - RT	Sainsburys, Camden Road, London, NW1 9LJ	529058, 184048	The building is not structurally suitable to accommodate the required equipment.

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


N/A - The map below shows the location of the discounted options set out above:



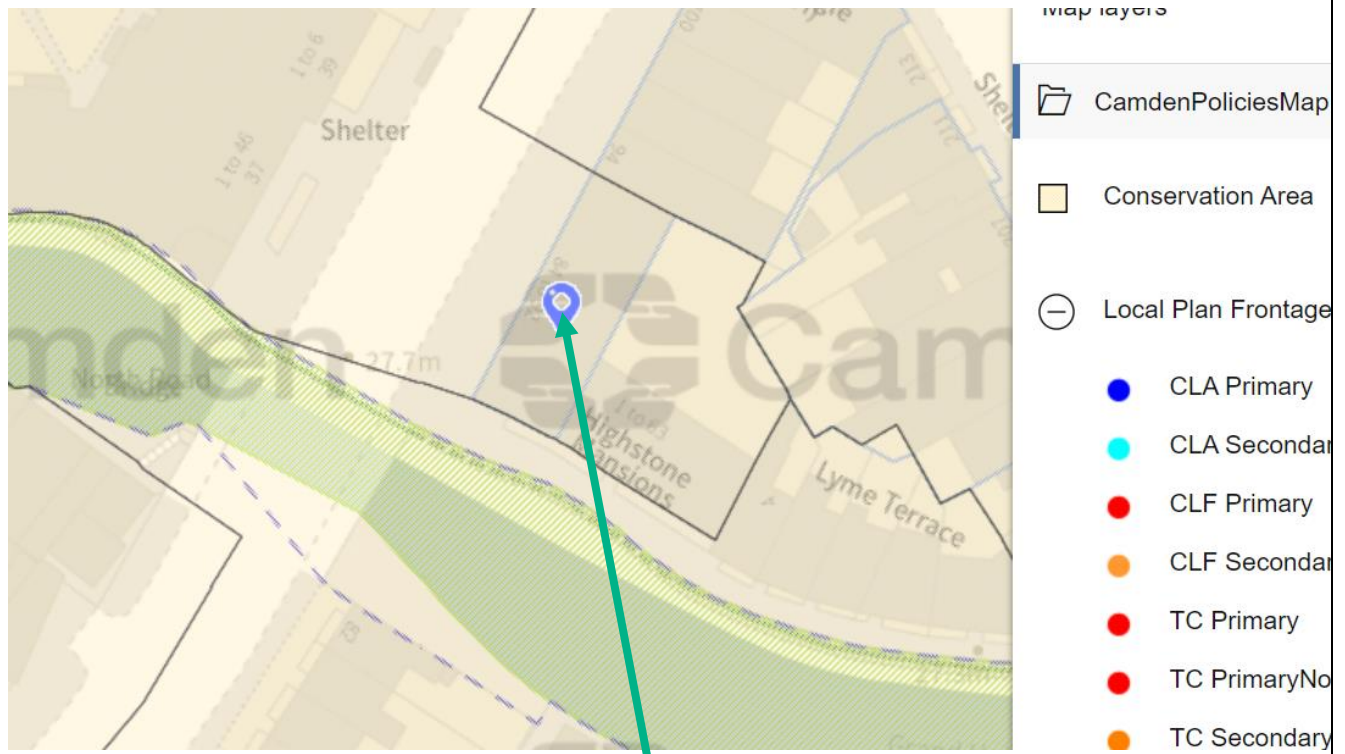
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Land use planning designations:



Site location

The map above is an extract of the Council's interactive policies map. The map confirms the host building is located within a conservation area (yellow shading shading).

Additional relevant information (include planning policy and material considerations):

Heritage Statement:

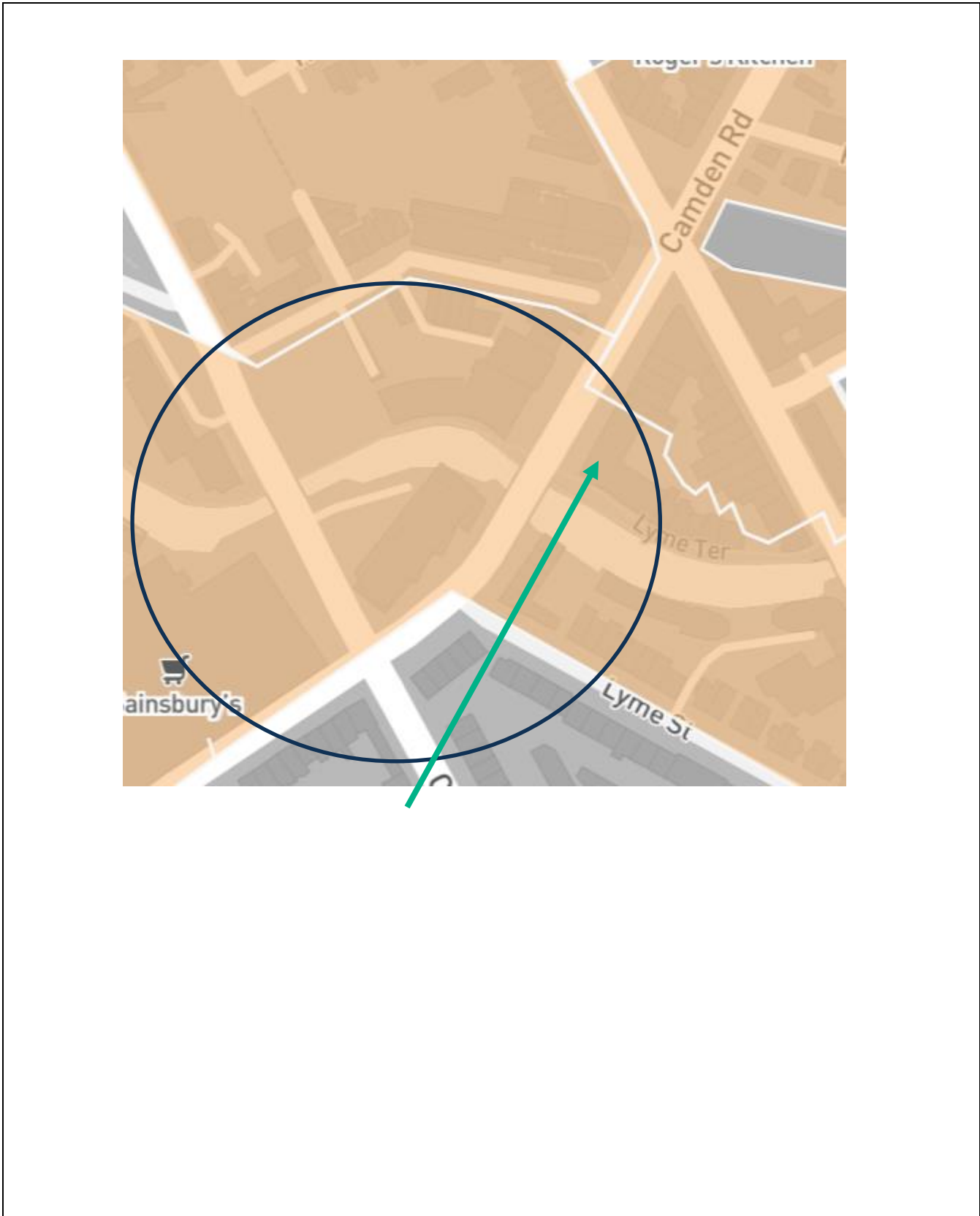
The main issue with the proposed development is considered to be its impact on heritage assets. The site is located within a conservation area, the Regents Canal Conservation Area, as confirmed by the extract below from the Council's interactive conservation areas map. The map is annotated with both the location of the application site and the search area:

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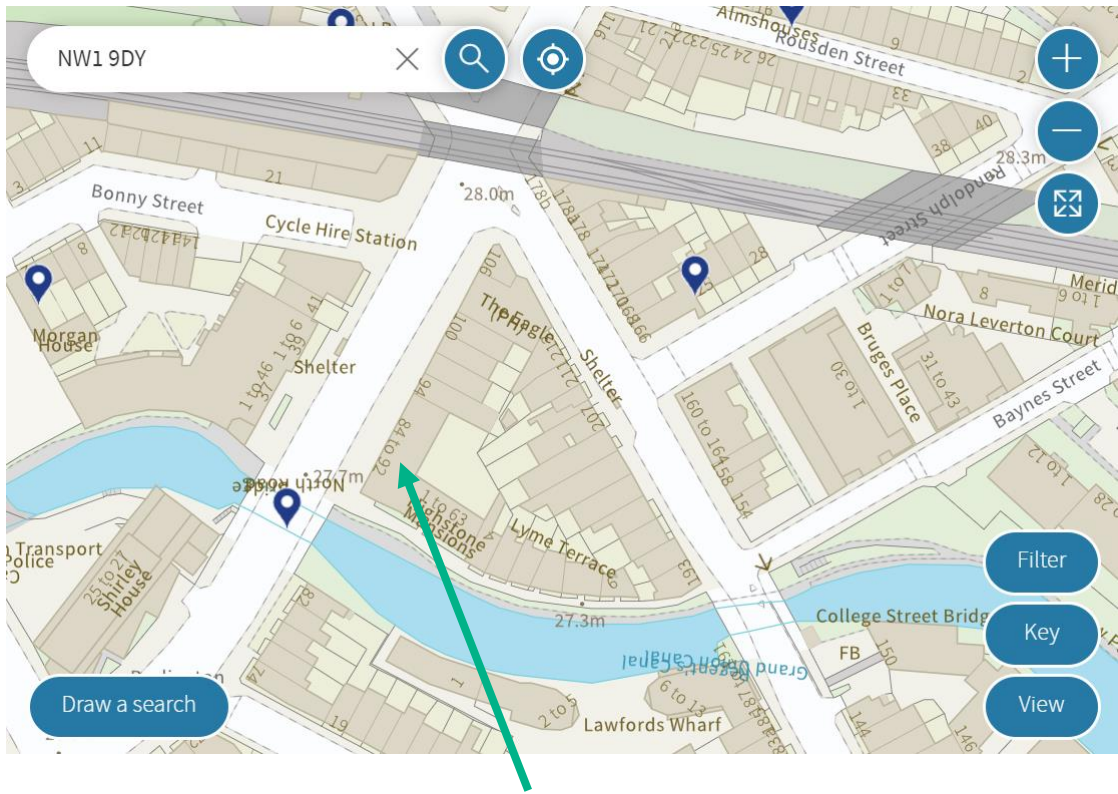
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In terms of listed buildings in the area, these are shown on the map below:



The above map is taken from the Historic England online search facility. The closest listed building is the bridge to the south of the south, across Regent's Canal, which is Grade II listed.

The location of the site within a conservation area, and close to listed buildings is noted. As set out above the sensitivity of the siting accounts for the reduction in the level of equipment from the previous application on the building, however a design is proposed which would minimise impact on the host building and surrounding area as far as practicable.


It is accepted that equipment on the roof of the building would be visible and have an impact on the host building and surrounding area. However, the impact on heritage assets would be less than substantial, and that this less than substantial harm would be outweighed by the significant benefits of the development, in terms of improved connectivity to this area of Camden.

Within the constraints of the host building and surrounding area, and with the height of the equipment kept to a minimum, it is considered that the development would result in a less than significant harm to heritage assets. The minimal level and height

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of equipment on the roof of the building, and the careful siting of equipment cabinets, assists in keeping the overall impact of the development to an absolute minimum, and ensures that any harm is outweighed by the significant benefits of the proposal.

The importance of improved connectivity and the significant public benefits of telecommunications proposals has been cited in recent appeal decisions. An example is appeal reference APP/V5570/W/20/3246770 for a rooftop development within the London Borough of Islington. In allowing the appeal the Inspector noted at paragraphs 20, 21, 26 and 27:

“20. As set out in the National Planning Policy Framework (February 2019) (the Framework), any less than substantial harm to designated heritage assets should be weighed against the public benefits of the proposal.

21. As set out in the Framework, advanced, high quality and reliable communications infrastructure is essential for economic growth and social wellbeing and planning decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. The scheme would support high quality communications and digital connectivity by providing 2G, 3G and 4G connectivity for two different nationwide networks that have a high market share in cumulative terms, as well as the future ability/opportunity to upgrade to 5G services.

26. I am mindful of the statutory duties that require special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas and of preserving or enhancing listed buildings, their settings or any special architectural or historic interest which they possess. I am also conscious that the Framework indicates that, when considering the impact of a proposal upon the significance of designated heritage assets, great weight should be given to the assets' conservation. This is irrespective of whether any identified harm to its significance is at a substantial or less than substantial level.

27. Nevertheless, I am content that the minor level of less than substantial harm that I have identified to multiple designated heritage assets, even when considered in a cumulative sense, would be outweighed by the significant public benefits that would be achieved by the proposal.”

When undertaking the balancing exercise for this proposed development it is considered there would be also be 'minor level' of less than substantial harm, and the significant public benefit would outweigh the less than substantial harm.

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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 and capacity can be provided to the area for VMO2. It is considered the overall development would not appear excessive. The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting technical requirement and avoiding harm to its the setting, both in terms of the impact on visual amenity and heritage assets.

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 (2021) (NPPF)

The National Planning Policy Framework came into force in 2012. The guidance has most recently been revised in July 2021. The NPPF sets out the Government's planning policies for England and how these should be applied.

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

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

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

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

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

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

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

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

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

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

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business processes, access to new markets and support flexible working and working from home.

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

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

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

Leading on from this, paragraph 114 states that *"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections"*.

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 115 states that *"The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged"*.

By utilising a rooftop to provide coverage to the area for VMO2, the proposal is in line with the above policy.

It should be noted that paragraph 118 states that *"Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure"*.

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In terms of heritage assets, section 16 of the guidance deals with 'Conserving and enhancing the historic environment'. Paragraph 189 sets out that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 202 states: "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." As set out in the preceding section, it is considered there would be a less than substantial harm, and this harm would be outweighed by the significant benefits of the proposal.

The proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plan for Camden Council relevant to the proposal comprises:

- The London Plan: Spatial Development Strategy for Greater London (adopted 2021).
- The Camden Local Plan (2017).

The London Plan


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

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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."

The revised guidance is clearly supportive of the proposal and the role that it will perform in allowing the VMO2 network to provide enhanced coverage and capacity to the surrounding area.

Local Plan

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

In terms of design, a solution is proposed which would limit the impact of the development on the surrounding area as far as practicable. Three sets of two antennas are proposed to be located towards the edge of the building, to ensure the overall height of the equipment is kept to a minimum. In addition, the level of equipment proposed has been reduced from the previous submission, with a reduction in both the number of antennas and equipment cabinets.

As far as heritage assets are concerned the preceding section of this document confirmed that there would be a less than substantial impact on heritage assets, and this impact would be outweighed by the significant benefits of the proposal.

No conflict has been identified with any other Development Plan policies.


Overall, it is considered the proposal complies with both national and local policy. In terms of national policy, the proposal is sympathetically designed, it would enhance the provision of local community facilities and services and would protect visual amenity and heritage assets. The impact of the development would be outweighed by the significant benefits of the proposal.

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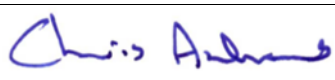
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Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for an improved quality of service. This development is proposed to provide high quality enhanced coverage to the area for the VMO2 network. A simple design solution is proposed to mitigate visual impact and prevent harm to the local environment.

The proposed development is compliant with the relevant policies from the NPPF and Development Plan, as outlined within this supporting statement. The proposal is fully compliant with ICNIRP guidelines and declaration of compliance has been provided.

Confirmation that submitted drawings have been checked for accuracy


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Signed:		Date:	12 June 2023
Position:	Planning Department	(on behalf of	
		Cornerstone)	

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