SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Jacqueline House	Site Address:	Jacqueline House 52 Fitzroy Road London, NW1 8UB
National Grid Reference:	E527980 N183900		
Site Ref Number:	CTIL_208328 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 mast register was found however, the LPA's planning records were reviewed.		
Were industry site databases checked for suitable sites by the operator:	**Yes**	No
If no explain why:		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	**Yes**
Date of pre-application contact:	30/05/2023
Name of contact:	N/A
Summary of outcome/Main issues raised: Pre-application correspondence including a set of plans detailing the proposal was emailed to the LPA on 30 May 2023. In an email dated 31 May 2023, the LPA advised that a fee was required for pre-application advice. Considering the planning merits of the site, it was considered appropriate to progress the application and seek the LPA's formal determination.	

[1] Macro or Micro

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Annual area wide information to planning authority

Has annual area wide information been provided?	Yes / **No**
If no explain why:	
Summary issues raised: Cornerstone's commercial relationship with VMO2 (trading as O2) has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means they no longer have visibility of VMO2 full update plans. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. Cornerstone aims to engage and work with the planning department at the earliest opportunity from when they are instructed to deliver new infrastructure within a Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss wider rollout plans. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans, then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	**Amber**	Green
Outline of consultation carried out: The site and proposed works were assessed against the traffic light model prior to consultations being undertaken. An amber rating was assigned. Pre-application correspondence was issued by email on 30 May 2023 to Primrose Hill Ward Councillors, Cllr Ajok Athian, Cllr Anna Burrage and Cllr Matt Cooper, to the Holborn and St Pancras MP, Sir Keir Starmer and to Primrose Hill Community Association. The residents of Jacqueline House and the occupiers of nearby properties in Regent's Park Road and Fitzroy Road were notified of the proposal by post on 30 May 2023. A total of 282 properties were notified.			
Summary of outcome/main issues raised (include copies of relevant correspondence): 2 responses were received requesting additional information.			

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"Please can you outline the planning stages that you need to go through to get your approval to get this tower approved. *o Is this proposed 'base station installation' to provide WiFi for C & C residents?* *o Or Is this proposed base station installation to provide WiFi for a population of a much wider geographical area?* *o Who or what body will pay for this installation?* *o From whom was permission sought?* *o Please send an image/detailed measurement description of Cell number CTIL_208328 21* *o What would be the time frame for installation's start to completion?* *o If the project goes ahead WHEN is work to commence?* *o Will 'someone' be paid for the use of the land?* *o Please email too a CLEARER MAP …as the one in the letter it too small/faint"* The relevant matters are addressed in this report. The need for the proposed installation is explained in part 4 of the report. The proposal is detailed on the plans attached to the application.

School/College

Location of site in relation to school/college (include name of school/college): Ready Steady Go Fitzroy Road Pre-School at Primrose Hill Community Centre, 29 Hopkinson's Place, London, NW1 8TN is located approximately 65 metres from the subject site. The nursery is separated from the subject building by existing development.
Outline of consultation carried out with school/college (include evidence of consultation): The Head Teacher at the above pre-school was notified of the proposal by email on 30 May 2023.
Summary of outcome/main issues raised (include copies of main correspondence): No response was received.

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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

The proposed site:
The subject building is a seven storey block of flats located on the western side of Fitzroy Road. The building is part of the Oldfield Estate. The building has two plant rooms on the western and eastern sections of the roof respectively. The roof has existing TV aerials and satellite dishes. The proposed apparatus would be installed on the eastern/southern section of the roof. The building is in Primrose Hill Conservation Area. The surrounding area is predominately residential. To the west of the subject building beyond the adjacent flatted development and Regent's Park Road is Primrose Hill open space.

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Subject building as viewed from Fitzroy Road. Source: Google Maps

Aerial view of the subject building and surrounding environment Source: UK Grid Reference Finder Map

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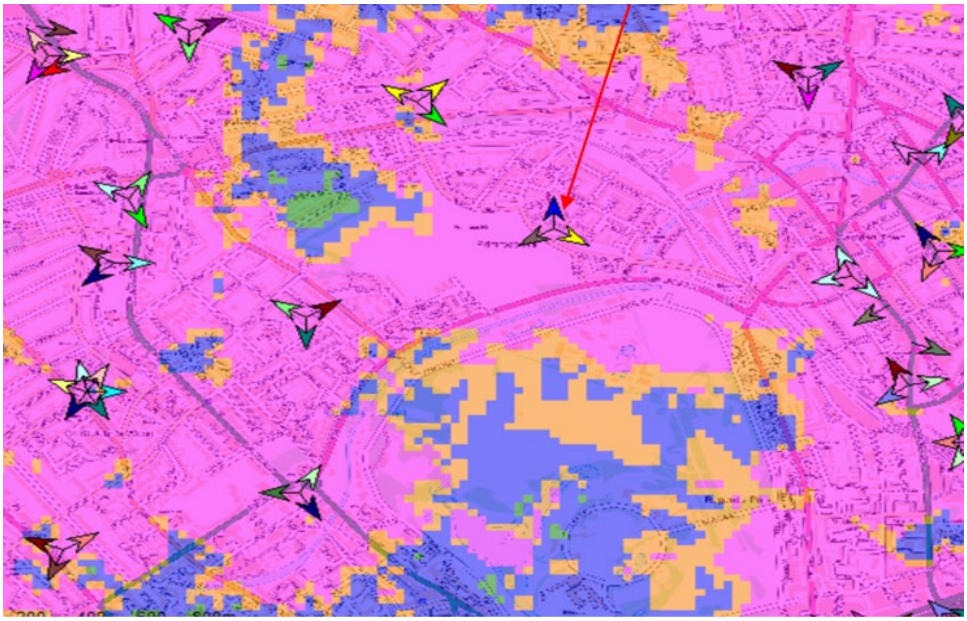
Enclose map showing the cell centre and adjoining cells if appropriate:


Map showing the proposed site (shown a red arrow) and neighbouring cells

Type of Structure *(e.g. tower, mast, etc):*	
Description: The proposal comprises of the installation of 6no. antennas, 2no. 300mm dishes, 3no. equipment cabinets and ancillary development thereto at roof level.	
Overall Height: Top of proposed antennas	26 metres
Height of existing building *(where applicable):* Height of pant room	19.80 metres 23.20 metres
Equipment Housing: x 2	
Length:	0.750metres
Width:	0.600 metres
Height:	1.800 metres
Equipment Housing: x 1	
Length:	0.705 metres
Width:	0.831 metres
Height:	2.068 metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel with grey finish
Equipment housing – type of material and external colour:	Steel with grey finish

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

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

The design of the proposed development has been formulated having regard to the technical requirements of the site and the need to minimise visual impact. Every effort has been made to minimise the visual effect of the installation as far as is practicable for an installation of this nature and as technical requirements permit. The amount and scale of the proposed equipment has been kept to the least necessary for operational efficiency.

It is proposed to install 6 antennas, 2 dishes and 3 equipment cabinets with associated apparatus on the eastern section of the roof. The antennas would be installed in pairs supported by steel poles fixed to the plant room walls in the northern corner and on the eastern and western side walls respectively. By installing the antennas in pairs, less support poles would be required which would minimise visual clutter. The two dishes would be installed on the two antenna support poles located on the northern and western end of the plant room respectively. The cabinets would be positioned on the main roof adjacent the plantroom at the north end.

By way of background information, this is the second telecommunications proposal by the applicant at this location. The previous scheme was granted planning consent via decision notice dated 14 April 2016 (application Ref: 2016/0445/P). The subject application features an alternative design to the approved scheme in application 2016/0445/P. Due to advancements in technology (since the previous application in 2016), the design has been modified to incorporate the latest 5G technology and to comply with the current ICNIRP guidelines.

The proposed antennas need to be located above surrounding clutter such as existing buildings and trees to deliver the requisite coverage levels to the desired areas effectively without interference. The surrounding area has a considerable amount of tree cover. The proposed antennas must be allowed to unrestrictedly emit a radio signal meaning they need to be sited at an elevated position on the rooftop to enable the radio signal to clear surrounding features. It should be noted that 5G antennas are more susceptible to the shadowing effect of surrounding clutter and therefore the height and siting of the proposed antennas (which incorporate 5G technology) is critical to delivering the required 5G coverage. The proposed antenna height is the lowest necessary to achieve the requisite levels of coverage in the target area.

All UK mobile phone base stations are designed to comply with the stringent International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure guidelines recommended by the UK government and the European Union. The proposed installation needs to achieve a specific height to comply with these

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guidelines. It is not possible to position the antennas at a lower height as this would create the problem of 'clipping' where the antennas would propagate onto the rooftop. This would breach ICNIRP guidelines and negatively impact the operation of the site. The proposed antenna height would negate the "clipping" and ensure the rooftop is ICNIRP compliant for people accessing it for maintenance and other purposes.

The above technical aspects have determined the height of the antenna support structures which as previously mentioned, is the minimum required to address the technical need and to ensure ICNIRP compliance.

The transmission dishes would measure 300mm respectively. The size of the dishes is the minimum necessary to meet the technical requirement. The dishes would be installed at a height that would enable the installation to connect with other base stations in the wider network without obstruction.

As previously noted, the proposed cabinets would be located adjacent the plant room. They would be set back from the roof edge to minimise visual impact.

Consideration was given to placing a GRP enclosure around the antennas however this would add a bulky extension to the plantroom. It was determined to leave the antennas unshrouded as it is considered this would impact the building less and would be less prominent as the antennas are of a suitably slender and unobtrusive appearance.

Factoring in technical constraints, it is considered that the proposed design strikes a good balance between minimising visual impact and meeting the technical need. In assessing the impact of the proposed design, considerable weight should be afforded to the technical constraints outlined above as these have greatly influenced the design and siting of the apparatus and severely limited the scope to alter the appearance of the installation.

Health and Safety - including ICNIRP compliance
The proposal complies fully with ICNIRP guidelines and declaration of compliance is provided with the application.

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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 proposed base station would provide new 5G coverage, it would enhance 3G and 4G service provision in this area and provide additional capacity on the network in this dense residential area of Primrose Hill. The new site will significantly improve mobile connectivity for users in this area and it will provide much needed capacity as surrounding sites struggle to provide the required coverage and capacity in the area.

Coverage plots, illustrating the predicted coverage levels from the application site and its relationship to the neighbouring cells are attached to the application. The plots provide a visual representation of signal strength, by means of shading, as indicated on the plot key provided. The signal levels are shown at "Indoor" and "Outdoor" levels. The purple shading (Indoor Dense Urban) represents the strongest signal level required to deliver a reliable network in a dense urban area such as this one. The yellow shading (Outdoor) represents the weakest signal, only sufficient for use of a mobile phone outdoors. Although both "Indoor" and "Outdoor" coverage are important to the network, indoor coverage plays a critical role in commerce given the dependency on mobile connectivity by businesses.

Below are snips taken from the coverage plots to demonstrate the need for the proposed site.

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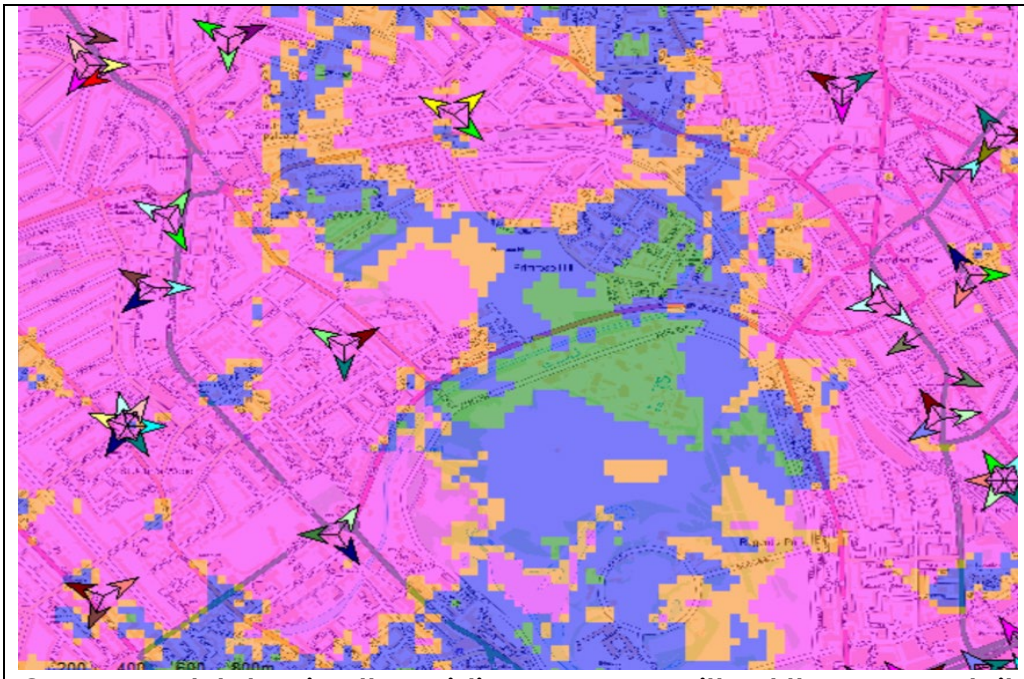
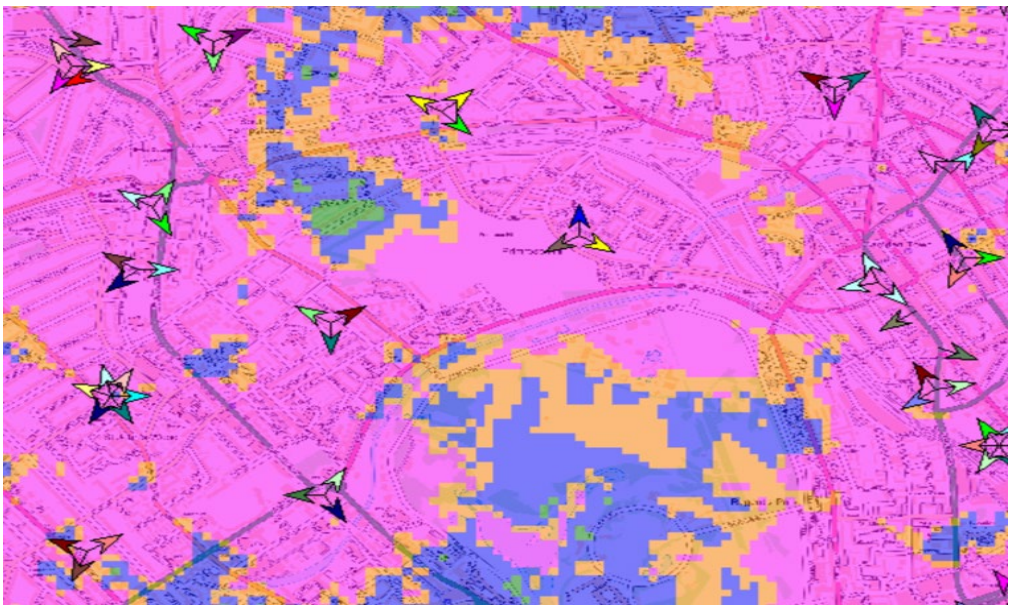


Coverage plot showing the existing coverage without the proposed site at Jacqueline House

As shown on the coverage plot above, the coverage levels in the area surrounding Fitzroy Road, Primrose Hill park and the A5205 are inadequate for a dense urban area such as this one. It is apparent the proposed site would significantly improve the signal strength in this area including in parts of Primrose Hill park and the London Zoo as demonstrated by the coverage plot below improving reliability and mobile connectivity to the benefit of the local community and visitors to the area.



Coverage plot showing the predicted coverage from the proposed site at Jacqueline House

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It is important to note that plots of this nature only show the geographical reach of coverage. Capacity, the volume of call and data traffic that can be handled by any one base station at a given time, does not display on the plots as a visual representation is not possible. This is, however, a critical network consideration that needs to be addressed to achieve a reliable, mobile digital infrastructure network. For example, in some areas the coverage improvements may appear modest, however, during times of high usage in these areas, the quality of services would still be affected if the capacity on the network is limited. Similarly, an area may be coloured "purple/orange" indicating a strong signal strength, but if there is a heavy network demand in these areas, the network might not have the available capacity to provide a stable and fast connection for users.

As previously explained, in addition to improving mobile connectivity and providing modern 5G digital services for residents and visitors to the area, the proposal would improve the capacity capabilities of the Operator's network further enhancing its reliability and efficiency.

The National Planning Policy Framework (NPPF) 2021 is clear in paragraph 118 that LPAs should not question the need for an electronic communications system. There is a clear and demonstrable need for the proposed development which would improve the existing mobile reception in this area as demonstrated by the coverage plots and therefore it should be allowed to proceed considering the wider benefits it will deliver to residents and visitors in this area, coupled with the acceptability of the site and the lack of feasible alternative siting options.

The benefits of reliable mobile connectivity and 5G provision are widely recognised. The government recognises the importance of advanced communications infrastructure, such as the proposed development, as a key driver of economic growth. It considers digital connectivity as an essential service that should be readily accessible to everyone. In the latest report by the Department for Science, Innovation and Technology "UK Wireless Infrastructure Strategy" April 2023, in the foreword the Secretary of State states that "*Connectivity has brought benefits for British households and British business, boosting growth, productivity, and opportunity for all. And change shows no sign of stopping. In fact, we find ourselves on the brink of a new revolution which promises to transform the world once more.*" She further states that "*5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone 5G will drive growth in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. 5G can improve our public services, too, in everything from education to social care. In transport, for example, we can use 5G to power forward*

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progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis." "This is an incredible opportunity; widespread adoption of 5G could see £159bn in productivity benefits by 2035. And it is exactly the kind of opportunity which the Department for Science, Innovation and Technology was created to seize. It is my personal mission as the Department's first Secretary of State to put Britain right at the forefront of scientific and technological progress. By bringing together world-class research and a dynamic business ecosystem, we can harness enterprise and innovation to grow the economy, driving forward the delivery of one of the Prime Minister's five priorities."

The report sets a bold ambition for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030. "*Given the substantial potential that 5G offers for businesses and public service delivery, we are setting out a bold vision for the next generation of our national networks to galvanise investment across our economy. We want to move beyond the basic 5G that is being deployed now over 4G networks to build higher quality, standalone 5G networks that do not rely on older infrastructure. We also want to extend 5G coverage well beyond cities and towns to all populated areas of the UK, including rural villages and communities.*"

In the same report, in the forward by the minister of State, she states that "*delivering world-class digital infrastructure to all Britons is a fundamental mission of this government - and our efforts to build it the modern equivalent in scale and ambition to the Victorians' construction of the railways. Our plan is for every corner of our country to get lightning fast connectivity, not only to give people real choices about where to live and work today but so they will not be left out of future technological revolutions because of poor infrastructure.*" "*Although it is impossible accurately to predict when large scale demand for 5G and other forms of advanced wireless connectivity will emerge and how widespread that will be, mobile data provided over public mobile networks has grown 40% per year on average over the last decade and we expect to see continued growth in data traffic over the next decade. Ofcom's Mobile Market Review suggests data growth could range from a 25% increase per year to 2030 to 55% increase per year to 2030.*"

The growth of mobile usage and increase in demand for mobile data is further highlighted in Ofcom's report "Mobile networks and spectrum - Meeting future demand for mobile data (9 February 2022)." According to this report "*In recent years we have seen an average 40% year-on-year growth in demand for mobile services provided over public mobile networks. This growth has been driven by the development of new applications and enabled by evolving technologies and consequent changes in consumer behaviour" (paragraph 2.6). The demand for mobile data is expected to "continue to grow as we rely on it ever more to carry out daily activities like shopping, gaming, banking and watching movies. Demand is likely to be stimulated further as new and more sophisticated applications are developed,*

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and by the development of machine-to-machine and machine-to-device applications" (paragraph 2.7).

In paragraph 1.1 of *"Ofcom's future approach to mobile markets and spectrum" report, it is stated that "We expect demand for mobile data to continue to grow as greater use is made of data-hungry services and as new technologies enable new uses." "Network quality is likely to be of growing importance to customers"* (paragraph 1.2). Reliable and advanced infrastructure like the proposed development is required to support the increasing demand on the networks and to support the latest 5G technology required to deliver advanced mobile capabilities**.**

The Ofcom report ''Online Nation 2020'' also highlights the increasing demand for communications services particularly data services and the key role mobile phones play in accessing the internet. According to this report *''71% of all measured time spent online was on smartphones. 35% of internet users only accessed the internet on mobile devices (smartphone or tablet).''*

The importance of mobile technology, more generally, in the UK, and its contribution to the sustainability agenda is further emphasised in a series of annual communication market reports published by OFCOM, the latest version is the ''Communications Market Report 2022'' According to this report, telecoms revenues made a £31.1 billion contribution to the UK economy in 2021 of which 12.3 billion was generated from retail mobile telecoms services. The report also highlights the increase in the use of mobile technology.

The economic impact of 5G technology is discussed in the report by PwC "The global economic impact of 5G". According to this report, the potential of 5G technology is huge. *"Innovative uses of the technology show promise in a wide variety of settings: hospitals equipped with 5G devices that enable remote patient monitoring, and smart ambulances that communicate with doctors in real time; digital wallets that connect phones, wearables, cars and other devices to create seamless financial transactions; and 5G-enabled factories in which connections can be maintained among more sensors than ever before. Such scenarios illustrate the economic impact of 5G mobile technology." According to this report, "healthcare will be far and away the biggest contributor to the economic gains from 5G and their model predicts that it could add more than half a trillion dollars to global GDP. But other industries also show significant potential, as 5G enables vast wave of innovative solutions and use cases."*

The report goes on to state that *"For policy-makers and governments, the key is to regard 5G as fundamental societal infrastructure: a platform that, by providing ubiquitous, superfast broadband, will influence the competitiveness of nations' economies and their ability to develop their own sunrise industries and technologies.*

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Policy-makers should look to encourage and provide incentives for 5G investments as quickly as possible."

Below are examples of practical applications of 5G connectivity in everyday life which further emphases the importance of this technology.

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.

Considering the importance of 5G technology and the remarkably high demand for mobile services, it is crucial for mobile operators to provide and maintain a reliable, mobile digital infrastructure network that provides the necessary coverage and capacity to allow reliable mobile connectivity and meet the ever increasing demand for services by users. The proposed essential infrastructure will contribute to meeting this demand and it will improve access to the very latest technologies for residents and visitors in this area.

The above government reports and connectivity reports emphasise the importance of advanced digital infrastructure such as the proposed development and support the expansion of 5G technology which can handle ever larger data requirements and significantly improve network efficiency. The proposal which supports 5G technology is precisely the type of high-speed digital infrastructure the government is

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seeking to promote to achieve its ambition of delivering world-class digital infrastructure to the whole of the UK, essential for sustainable economic growth.

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)

Several factors are considered when assessing potential locations for a base station. Because radio base stations are relatively low powered devices, they only cover a limited geographical area and therefore need to be sited in areas where they are needed, where people live and work. The area of coverage by any base station (referred to as a cell) is influenced by several factors for example topography, features in the surrounding area, such as buildings, trees etc. which can block radio signals. In heavily built-up areas like this one, for example, a small base station might cover only a few hundred meters resulting in more base stations being required in these areas than in more remote areas where base stations tend to have a larger footprint due to fewer obstructions.

Site placement is therefore critical in network planning due to the unique and specific gap in coverage that must be infilled to ensure the site fits into the established cellular pattern. This places even greater limitations on the potential siting opportunities as many locations will not enable this specific gap to be adequately filled. The coverage hole has been identified in the area surrounding Fitzroy Road as demonstrated by the coverage plots. The proposed site needs to be sited in the identified area of coverage deficiency to address the technical requirement.

A comprehensive review of the area was undertaken to identify possible siting options for the base station. Potential alternatives to the proposed site were considered in terms of their technical suitability to provide the required coverage levels to the target area, their placement within the existing cellular pattern, the effect on visual amenity and their ability to be built and maintained. The aim of site identification is to find the most technically efficient site, which has the minimum impact on visual amenity and the environment.

A sequential approach was adopted in the site selection process. No feasible existing telecommunication sites are available in the target area that can be used to support the required telecommunications apparatus. As no feasible mast sites could be found, it is proposed to use an existing building in line with government policy guidance.

The target area is predominantly made up of properties with pitched roofs and the open green space of Primrose Hill. Most of the buildings do not offer the elevation required to effectively fill the coverage hole. The proposed site balances the coverage requirements with a host of other technical aspects as noted above, including planning considerations. It has been selected as the optimum option that would meet the technical need with limited impact on the area.

Below is the list of alternative siting options considered in the area and reasons why they have not been chosen.

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
RT	Princess of Wales, 22 Chalcot Road, London, NW1 8LL	528123, 184009	This building has a pitched roof which is not suitable for the installation of telecommunications equipment.
RT	Hill View, Primrose Hill Road, London, NW3 3AX	527752, 183999	This building was deemed suitable by the operators, but the proposal was dismissed at appeal: REF: APP/X5210/W/21/3274361. As there were no alternative designs, this option was discounted.
RT	Marion House, 54 Fitzroy Road, London, NW1 8UD	527971, 183873	This building is lower than the subject building and therefore it would be less effective at providing the required coverage levels to the target area.
RT	Circus Glory Trapeze School, Primrose Hill Community, 29 Hopinksons Place, London, NW1 8TN	528056, 183940	This building has a pitched roof which is not suitable for the installation of telecommunications equipment.
RT	Breathe Fitness, 13 St George's Mews, London, NW1 8XE	527819, 184060	This building is lower than the subject building. An installation at this location would not provide the required coverage levels to the target area.
SWs	Outside Primrose Hill Park and Garden, Regent's Park Road, London, NW1 4NG	528030, 183780	A 20m – 25m ground mast would be required at this location to clear the mature trees in this area to deliver the requisite coverage levels to the intended area. It is considered that a structure of this height at this roadside

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			location would have a greater impact on visual amenity than the proposed development on an existing building. This option has been discounted in preference of the proposed site with greater planning merit.
RT	Carole House, 80 Regent's Park Road, London, NW1 8UE	527964, 183901	This building is lower than the subject building. An installation at this location would not provide the required coverage levels to the target area.
SWs	Street Furniture on Ainger Road, London, NW3 3AX	Various NGRs	A 15m -17.5m street furniture pole would be required at this location to achieve optimum coverage in this area. This road offers insufficient pavement space for a street furniture installation and safe passage of pedestrians using pushchairs and wheelchairs. Furthermore, it is considered that a ground base mast at this roadside location would have a greater impact on visual amenity than the proposed development on an existing building.
SWs	Street Furniture on Fitzroy Road, London, NW1 8UD	Various NGRs	A 15m -17.5m street furniture pole would be required at this location to achieve optimum coverage in this area. This road offers insufficient pavement space for a street furniture installation and safe passage of pedestrians using pushchairs and wheelchairs. Furthermore, it is considered that a ground base mast at this roadside location would have a greater impact on visual amenity than the proposed development on an existing building.
SWs	Street Furniture on Primrose Hill Road, London, NW3 3AX	Various NGRs	A 15m -17.5m street furniture pole would be required at this location to achieve optimum coverage in this area. This road offers insufficient pavement space for a street furniture installation and safe passage of

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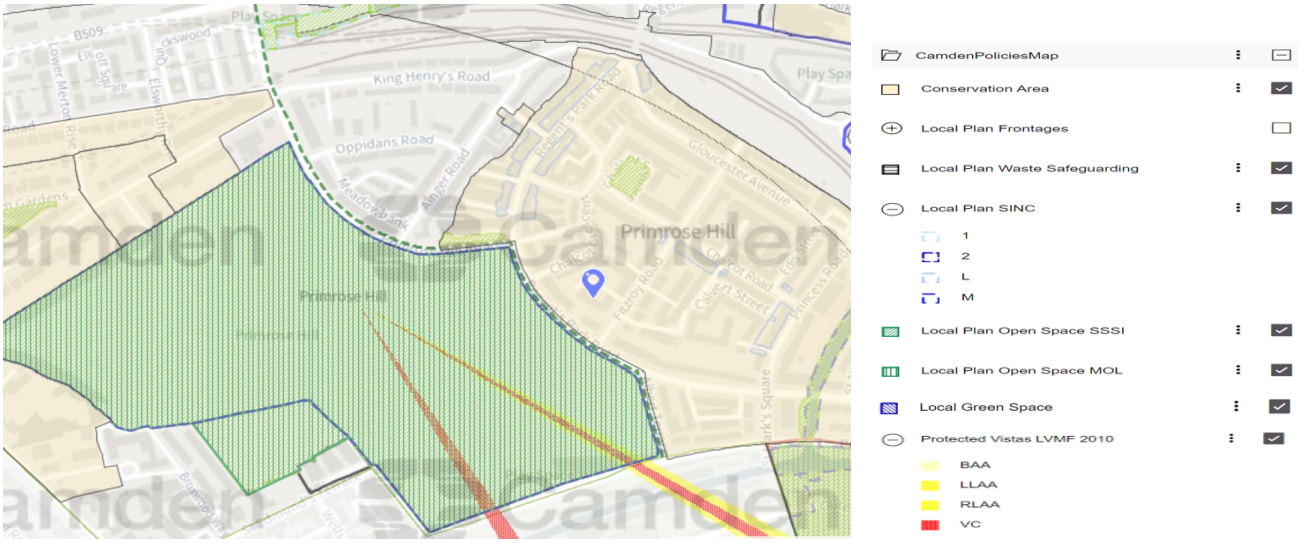
			pedestrians using pushchairs and wheelchairs. Furthermore, it is considered that a ground base mast at this roadside location would have a greater impact on visual amenity than the proposed development on an existing building.
SWs	Street Furniture on Chalcot Crescent, London, NW1 8YD	Various NGRs	A 15m -17.5m street furniture pole would be required at this location to achieve optimum coverage in this area. This road offers insufficient pavement space for a street furniture installation and safe passage of pedestrians using pushchairs and wheelchairs. Furthermore, it is considered that a ground base mast at this roadside location would have a greater impact on visual amenity than the proposed development on an existing building.

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

Land use planning designations:

The subject building is in Primrose Hill conservation area.



Application site (shown by a blue marker) in relation to existing land use designations Source: Camden Policies Map

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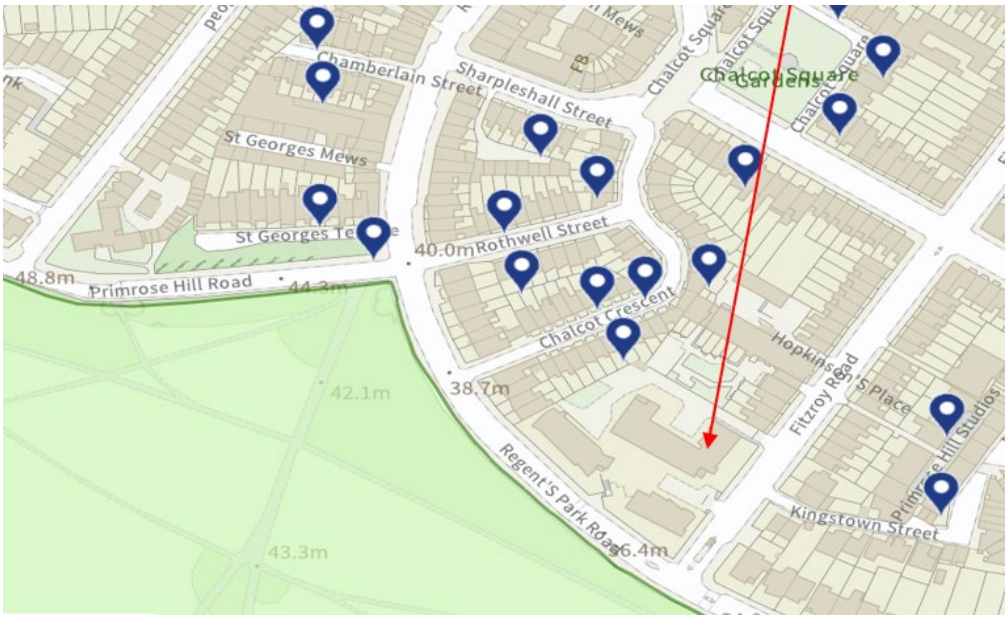
The building is not listed. The nearest listed buildings are a row of Grade II listed terraced houses (Nos. 2-22) fronting Chalcot Crescent.



Subject building (shown by a red arrow) in relation to nearby listed buildings
Map Source: Historic England Map Search

Heritage Assessment

According to the Primrose Hill Conservation Area statement, the conservation area is divided into four sub-areas. The proposed site is in sub area one (Regent's Park Road South). This sub area is located to the south of the Conservation Area, and it is neighboured to the west by Primrose Hill and to the south by Regent's Park and London Zoo. Jacqueline House is identified as a negative building in the conservation area statement. It does not form part of the significant views in the conservation area.

Heritage Planning Policy

In determining planning applications, the National Planning Policy Framework (July 2021) (NPPF) advises that "local planning authorities should take account of:

a) *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*

b) *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;…."* (para. 197)

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"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." (para 202)

Camden's Local Plan Policy relevant to heritage assets is Policy D2. For ease of reference relevant parts of this policy are noted below:

Policy D2 Heritage

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

"Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss,……"

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

The Council will:

e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

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Heritage Impact Assessment

In evaluating the development proposal, a key consideration is the balance of preserving heritage assets while also enabling the economic growth and social needs of this area to be suitably served by quality electronic communication services.

The proposed development would be sited on the roof of a relatively tall and substantial building. The surrounding area is predominately residential in character. The roof has two plant rooms, TV aerials and satellite dishes and handrail. These structures provide an appropriate setting for the proposed development.

The need to preserve the character and appearance of designated heritage assets is recognised. Every effort has been made to minimise visual impact as explained in part 3 of this report. The proposed apparatus would be restricted to the eastern section of the roof and the amount of equipment is limited to minimise visual clutter. The antennas would project above the plantroom by a modest 2.8 metres. As previously explained, the height of the antennas is the lowest required to clear obstructions to provide the requisite coverage and to comply with ICNIRP requirements. The principal views of the antennas would be from Fitzroy Road where they would be viewed in conjunction with other rooftop structures. The slender appearance of the antennas, their limited height and inconspicuous colour would ensure they do not appear unduly prominent against the skyline.

In the below view, the antennas on the northern and eastern sides of the plantroom would not be apparent and the cabinets would not be evident. The antennas on the eastern side would be noticeable as slender unobtrusive features against the skyline. Given the height of the building, the apparatus may go unnoticed as the elevation of the building takes it away from the public realm.

View from Fitzroy Road looking north. Source: Google Maps

View from Fitzroy Road looking south. Source: Google Maps

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

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Views of the apparatus from Fitzroy Road would be confined to the immediate area. Mid-long range views would be restricted by existing development, intervening trees and the setback position of Jacqueline House from the highway as shown in the photo above.

View from Kingstown Street. Source: Google Maps

Views from Kingstown street would be short range. The antennas on the eastern side of the plantroom would be most noticeable in the above view, however, as previously mentioned due to their modest scale, limited height and subtle colour, the antennas would not dominant the skyline. Only the side of one cabinet would be visible in this view. It would be seen as a small feature adjacent the plant room. The cabinets would not project above the plant room.

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Mid-range view from Kingstown Street. Source: Google Maps

As noted previously, views from Kingstown Street would be confined to the area near Fitzroy Road. Mid-long range views would be restricted by the bend in the road and existing development as seen in the photo above.

View from Regent's Park Road. Source: Google Maps

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Views of the installation from Regent's Park Road would be obscured by existing trees as shown in the photo above.

The installation would not be visible from Chalcot Crescent or Chalcot Road.

Overall, the visual impact of the proposal would be limited and within acceptable parameters. It is clear the proposed development will not undermine the visual amenity of the area, considering the limited views, the modest nature of the proposed works when viewed upon a relatively tall and large building and when seen in perspective of the surrounding development and from wider viewpoints within the street scene. It is important to highlight that telecommunications infrastructure is increasingly becoming an accepted part of the urban townscape and should therefore be viewed in that perspective.

The nearest listed buildings in Chalcot Crescent are located approximately 23 metres away. These buildings are separated from Jacqueline House by a car park and tree planting. The proposed apparatus would be positioned on the eastern section of the roof which is the farthest point from these listed buildings with a separation of approximately 58 metres. It is not considered the proposed development would negatively impact the setting of these listed buildings given the separation from the proposed location.

It is important to highlight that the proposal site offers the opportunity to locate the equipment upon a building that is not listed or one of merit thereby further minimising the impact on heritage assets.

On balance, it is argued that the resultant impact on heritage assets would be less than substantial, and that this would be outweighed by the public benefits of the development which would significantly improve mobile connectivity for users in this area.

The Planning Inspectorate has in recent years continually recognised the importance of connectivity and continues to afford significant weight to public benefits of telecommunications infrastructure in appeal decisions. For example in the recent appeal made by Cornerstone, Telefonica and Vodafone against the decision of the London Borough of Islington (appeal reference APP/V5570/W/20/3246770) relating to the proposal to install 6no. antennas, two 0.3 metre dishes and associated equipment on the roof of a building in a conservation area, close to listed buildings. In allowing this appeal, the Inspector noted at paragraphs 20, 21, 26 and 27:

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"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."

In another appeal by MBNL (EE UK Ltd & H3G UK Ltd) made against the decision of London Borough of Hillingdon (Appeal reference: APP/R5510/W/21/3269903) relating to the installation of a 20 metre high monopole supporting 12no. antenna apertures and 2no. 300mm dishes together with 8no. cabinets located close to three listed buildings, the Inspector finds that the proposal would cause some limited harm to the setting of the nearby listed buildings but concludes that the economic and social benefits of the proposal, would outweigh this harm.

In the appeal made by MBNL Ltd against the decision of City of Westminster Council (Appeal reference: APP/X5990/W/21/3270675) relating to the proposal to install 6no. antennas, 3no. 600mm dishes and 8no.cabinets at roof level behind proposed screening, the Inspector assesses the proposal and concludes that it would "*fail to preserve or enhance the character and appearance of the Area*", however the "*harm to the Area would be less than substantial*". On applying the balancing exercise they state that "*taking into account the need for the installations and the*

demonstrated lack of suitable alternative sites, I conclude that the benefits of continued and potentially enhanced communications outweigh the limited harm to the character and appearance of the Area and provide clear and convincing justification for that harm in this case." In assessing the impact on nearby listed buildings, the Inspector finds that "*the proposal would not be harmful to the significance of nearby listed buildings nor to the appreciation of that significance. Accordingly, the proposal would preserve the setting of these listed buildings*" like in this case.

The above appeals generally weigh in favour of the appeal proposal which would result in significant public benefits in providing vital communications infrastructure as discussed in this report. The importance of reliable digital infrastructure and its associated social and economic public benefits are widely acknowledged and, in this case, outweigh the limited impact on the area. The Planning Inspectorate recognises the importance of this infrastructure and attaches great weight to enabling its implementation.

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

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2021) (NPPF)

The National Planning Policy Framework (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*

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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*."

The proposed development will enable the provision of enhanced mobile communications services to the surrounding area, bringing about substantial social and economic public benefits as previously highlighted. It is by investing in essential digital infrastructure such as the proposed development that the above sustainable development goals would be realised.

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, 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 is 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*".

The proposed site would provide 5G coverage, it would improve existing 3G and 4G services and provide additional network capacity on the VMO2 (also known as O2) network. There are no viable existing telecommunications installations in the area that can be utilised for the installation. The apparatus proposed supports multi technologies eliminating the need for multiple sites and it would be deployed on an existing building in line with the above policy.

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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*".

The need for the development has been highlighted in part 4 of this report. The proposal has been designed to be fully compliant with the precautionary ICNIRP guidelines.

The proposed development is fully in accordance with the guidance as set out in the National Planning Policy Framework.

London Plan 2021

The London Plan is generally supportive of the essential infrastructure proposed in this application. It is the Mayor's ambition to continue building a 'smarter' city that works for all Londoners. And as specified in the Foreword of the London Plan 2021, the Mayor notes that "*it's about making London a city with clean air for our children to breathe, and a pioneering smart city with world-class digital connectivity supporting more digital devices to improve the lives of Londoners and enable businesses to thrive.*" "*Planning for a 'smarter' city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners*" (paragraph 1.0.10).

At paragraph 1.5.4, it is recognised that "*The right infrastructure is also required to help businesses succeed across London. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processes, opening up new markets and allowing more flexible working.*"

In paragraph 11.1.45, the Mayor recognises the need to invest in high quality digital infrastructure to meet increasing demand as "*business activities and people's lifestyles become more dependent on faster broadband.*" In paragraph 9.6.1, it is stated that 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.''*

All the above reinforce the importance of reliable mobile digital connectivity in making a real difference to London residents and businesses including those who would benefit from the suitably designed and located infrastructure proposed.

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Policy SI 6 'Digital connectivity infrastructure' is specifically aimed at supporting the development of digital infrastructure to ensure London's global competitiveness. It states:

A To ensure London's global competitiveness now and in the future, development proposals should:

1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users

2) meet expected demand for mobile connectivity generated by the development

3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation

4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

B Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.

The London Plan generally supports the provision of high quality digital infrastructure such as the proposed development. The economic and social benefits of the proposed essential infrastructure which would support 5G services and improve the overall quality of the operator's network have been previously highlighted. It is this type of development that the Mayor is seeking to promote to ensure London's global competitiveness and improve the lives of residents. The proposal complies with the above policy and guidance in the London Plan.

The overwhelming support for the proposed digital infrastructure in the NPPF 2021 and the London Plan 2021 reinforces its significance and therefore more attention should be afforded to proposals of this nature that would deliver the modern technology required to facilitate economic growth and for social well-being.

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Development Plan Policy

The Camden Local Plan 2017 sets out the Council's planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010).

The Local Plan has no policy specific to telecommunications development however, in paragraph 5.10 of the Local Plan under "Digital Infrastructure", the council recognises the importance of digital infrastructure and "expects electronic communication networks, including telecommunications and high-speed broadband, to be provided in business premises."

The proposal which would improve communications services in the area and facilitate faster mobile connections by providing 5G coverage is the kind of essential digital infrastructure the council is seeking to promote in line with the above policy.

The impact of the proposal on heritage assets has been assessed in the preceding section of this report where policy compliance has been demonstrated.

The proposed development complies with the relevant local plan policies and no conflict with any other aspect of the Local Plan has been identified.

Summary and Conclusion

The proposal has been designed and sited to keep the impact on the building and area to an absolute minimum, adopting a simple design with minimum apparatus as the technical constraints allow. The resultant visual impact would be limited given the modest scale of the development and its sitting and appearance. Consequently, the impact on heritage assets would not be significant. Taking into consideration the need for the installation and the demonstrated lack of suitable alternative sites, it is considered that the moderate impact on the building and wider area would be outweighed by the public benefits of the development resulting from enhanced mobile connectivity.

The need for the development has been highlighted. The proposed installation would provide 5G coverage and enhance existing 3G and 4G mobile services in this area. The social and economic benefits of advanced communications infrastructure are widely known, and these have been highlighted in this report.

The need to deploy the proposal at the proposed location has been explained. The proposed site was selected as the most viable option that would sufficiently address the technical need with minimum impact on the area. There are no feasible alternative sites in the area with greater technical and planning merit. The lack of viable alternative sites weighs significantly in favour of the proposal.

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The proposal is fully compliant with ICNIRP guidelines and declaration of compliance is provided with the application.

The development complies with the relevant local plan policies and national planning guidance as outlined in this report.

Confirmation that submitted drawings have been checked for accuracy

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Signed:	*f. kadama*	Date:	14 June 2023
Position:	Planner	(on behalf of Cornerstone)	Waldon Telecom Ltd

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