SUPPLEMENTARY INFORMATION

The operator currently provides coverage to the area from an existing site on the rooftop at Kingsway House, 105 Kingsway, Gray's Inn, Holborn, London, WC2B 6QY (NGR E: 530545, N: 181395). The building is in commercial use and is the subject of rooftop redevelopment proposals. Therefore, in order to maintain existing services and provide upgraded coverage to this part of Kingsway, there is a need to provide a replacement installation elsewhere. As the replacement installation will need to cover the same target coverage area and replicate the existing coverage footprint, it is required to be located as close as possible to the existing site.

Image 1: Existing base station

The Code of Practice, at para. 71, acknowledges the need to replace sites in close proximity to where the existing site was located. The London Plan (2021) also states that appropriate measures should be taken to avoid reducing mobile connectivity, and where this is not possible, any potential reduction would require mitigation (Policy SI 6).

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The proposed installation will be used by Vodafone, and will allow customers of the operator to benefit from the maintenance of existing legacy services as well as improved 4G coverage/capacity and new 5G services.

1. Site Details

Site Name:	58 Kingsway	Site Address:	58 Kingsway Gray's Inn Holborn London WC2B 6DX
National Grid Reference:	E: 530599 N: 181387		
Site Ref Number:	CS_306378_00	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?		No
If no explain why: None available.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	

[1] Macro or Micro

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Summary issues raised: Cornerstone's commercial relationship with Vodafone 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 Vodafone's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. Cornerstone aim to engage and work with the planning department at the earliest opportunity from when they are instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss their wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans then please advise. Cornerstone recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.

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
Summary of outcome/Main issues raised: A copy of the proposed plans together with a covering letter were sent to the Chief Planning Officer on 14/07/2023. No response to pre-application at the time of making the application.	

Community Consultation

Rating of Site under Traffic Light Model:	~~Red~~	Amber	~~Green~~
Outline of consultation carried out: Prior to the submission of this application the applicant undertook consultation discussions with the local planning authority and stakeholders. This provides an opportunity for the LPA and stakeholders to discuss the development proposals and identify specific issues early. Consultation letters and a copy of the proposal drawings were sent to Holborn and Covent Garden Councillors and Keir Starmer MP, by email, on 14/07/2023.			

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Summary of outcome/main issues raised (include copies of relevant correspondence): No response to pre-application at the time of making the application.

School/College

Location of site in relation to school/college (include name of school/college): • St Joseph's Catholic Primary School
Outline of consultation carried out with school/college (include evidence of consultation): Consultation letters and a copy of the proposal drawings were sent to the Head Teacher and Chair of Governors, by email, on 14/07/2023.
Summary of outcome/main issues raised (include copies of main correspondence): No response to pre-application at the time of making the application.

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the proposed development be on a civil safeguarding area or a defence safeguarding area?	**Yes**	No
Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area or defence safeguarding area been notified?	**Yes**	No
Details of response: London City Airport have confirmed that the proposal has no conflict with their aerodrome. Copy of notice and response enclosed.		

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	
Date served:	05/12/2024 Copy of notices, proof of service and delivery attached.	

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3. Proposed Development

The proposed site:

Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. They oversee works on behalf of telecommunications providers and wherever possible aim to:

- promote shared infrastructure
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development

Background

The site is to replace coverage which cannot continue to be provided at the current location at the rooftop at Kingsway House, 105 Kingsway, Gray's Inn, Holborn, London, WC2B 6QY (NGR E: 530545, N: 181395). The building is a residential block within Kingsway Conservation Area which is the subject of rooftop redevelopment. As such, Cornerstone needs to find a replacement site to ensure existing connectivity is not lost to the surrounding businesses, commercial areas & transport routes in this area of Kingsway. Therefore, in order to maintain existing services and provide upgraded coverage to this part of Kingsway, there is a need to provide a replacement installation elsewhere.

As the replacement installation will need to cover the same target coverage area and replicate the existing coverage footprint, it is required to be located as close as possible to the existing site.

The site

This application relates to a new telecommunications installation on the rooftop at 58 Kingsway.

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Image 2: The application site

The application is for the proposed installation of a replacement telecommunications base station comprising 3 no antenna on 4.8m / 3.8m support poles together with 1 no equipment cabinet and ancillary development thereto on the rooftop of 58 Kingsway. Top height of masts 31.00m / 30.00m AGL. 58 Kingsway is an unlisted building within the setting of listed buildings and within Kingsway Conservation Area. The building is in commercial use, operating as an 'All Bar One'.

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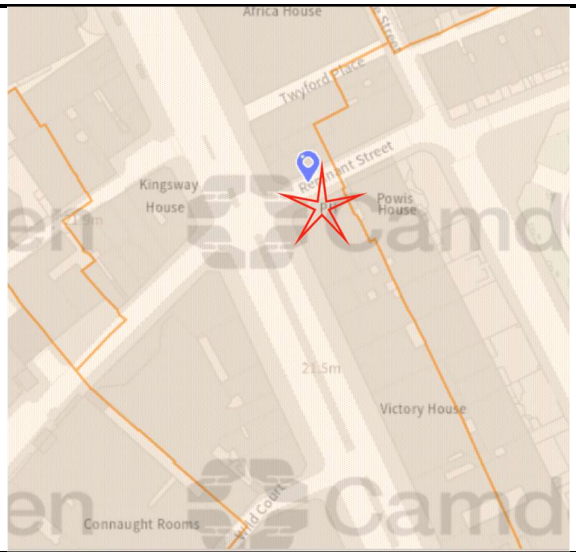

Image 3: Conservation Areas Mapping Extract from Camden Council

Image 4: Listed Buildings Mapping Extract from Camden Council

The application building is a 5-storey building located on the south-eastern corner of the junction of Kingsway and Remnant Street. Mature street trees (of up to 24m in height) line both sides of Kingsway. The Kingsway Conservation Area Statement states *'They provide an important foil to the monumentality and regularity of the building facades and together with the buildings create a boulevard effect and a pleasing homogeneous character'*[2].

The building is located within the Kingsway Conservation Area (Image 3). It is not a Listed Building (Image 4). Within the Kingsway Conservation Area Statement, it is described as a building that makes a positive contribution to the conservation area.

The location of the proposed works comprises a small area of the roof of 58 Kingsway. At present this area is unoccupied and is adjacent to acoustic screening erected in the 1980s, with existing plant work located behind this screen.

[2] https://www.camden.gov.uk/documents/20142/7871262/Kingsway.pdf/55056448-9698-44e2-8b72-042660ce73f8

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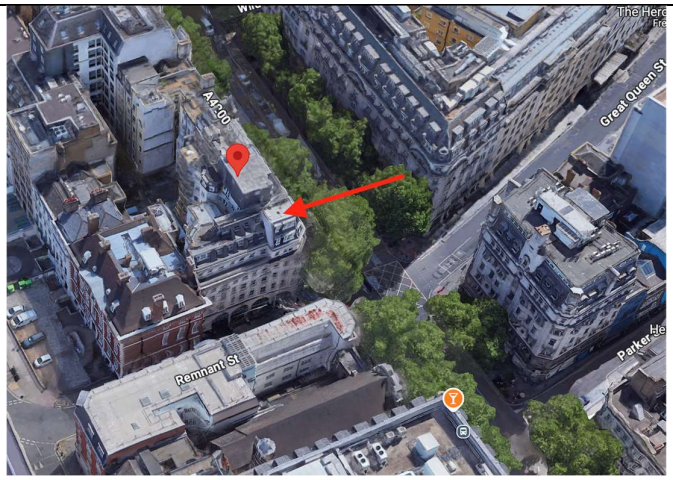

Image 5: The application site

The location on Kingsway at the heart of the business district, attracts high traffic due to its location in close proximity to Holborn London Underground station, the A40 which is a major arterial route, the British Museum and Lincoln Inn Fields. In order for customers working, living and visiting this area to be able to access existing services and benefit from improved 5G network coverage, the proposed replacement installation is required. It has also been designed to be future proof, thus enabling other technologies to be deployed depending upon the demand required.

As 5G is to deliver new technology, so too the infrastructure required is different than that necessary to provide the previous generations of connectivity.

An installation on 58 Kingsway will ensure that existing legacy services are maintained and the latest high quality 4G/5G services are provided in and around Kingsway for the operator Vodafone.

Photomontages are submitted in support of this application. Please refer to submittal documents.

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

The operator is seeking to maintain existing legacy services and provide enhanced 4G coverage and capacity to the surrounding area as well as new 5G services for Vodafone to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

The 4G provision allows internet access, video calling, data downstreaming, accessing social media networks and emailing to name just a few of the benefits. Therefore, to maintain high quality indoor 2G and 4G services into this area would promote activity in line with the general population demand as the ownership of smart devices increases. New 5G service provision will bring faster, more responsive and reliable connections than ever before. Vodafone is a

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Mobile Network Operator's (MNO). The application proposal will service not only Vodafone and) but also the Mobile Virtual Network Operators (MVNOs)[3] which use the MNO's networks by lease. Its shared function reduces the need for multiple installations.

Vodafone represents more than 24% of market share across the UK. It is therefore a fair assumption that more than 25% (including MVNOs such as Asda Mobile, Lebara, Talkmobile, Voxi which also use the Vodafone network) of the population in this immediate area obtain their mobile coverage and capacity (voice and data) from the Vodafone networks and will be relying on them for mobile coverage at any one time.

Fact sheets on Radio Planning and Propagation and Digital Public Benefits have been attached to this application for reference.

Type of Structure *(e.g. tower, mast, etc): Pole mounted antennas on rooftop*	
Description: The proposed installation of a replacement telecommunications base station comprising 3 no antenna on 4.8m / 3.8m support poles together with 1 no equipment cabinet and ancillary development thereto on the rooftop of 58 Kingsway. Top height of masts 31.00m / 30.00m AGL.	
Overall Height:	31.0 / 30.0 Metres
Height of existing building *(where applicable):*	30.0 Metres
Equipment Housing: 1 no PSC Cabinet	
Length:	0.823 Metres
Width:	0.600 Metres
Height:	1.720 Metres
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Steel – Galvanised
Equipment housing – type of material and external colour:	Steel – RAL 7038 (but can be colour matched to existing built form)
Reasons for choice of design, making reference to pre-application responses:	
Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (Paragraph 131) National Planning Policy Framework (Revised). It states: *'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'.*	

[3] https://www.which.co.uk/reviews/mobile-phone-providers/article/best-mobile-networks-overview-amhDx1F0z41t#who-are-the-biggest-uk-mobile-networks

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In keeping with the National Planning Policy Framework (NPPF) guidelines of using: "high quality communications infrastructure", the proposed design has been selected to minimise visual impact upon the surrounding environment.

The design of any communications infrastructure is dictated primarily by operational requirements and secondly by the development's setting.

From an operational perspective, the operators must ensure the following when devising a final design solution for any site:

- antennas are specifically orientated to transmit effectively and efficiently without signal being impeded;
- dish links (if required) achieve a direct line of site connection with other base station sites within the network; and
- GPS modules achieve a direct satellite link.

To achieve this the operator undertakes a panoramic assessment to determine what is the minimum height for transmission equipment to be located in a context of local topography and clutter, such as manmade or natural features, and in all cases the operator is committed to limiting the size and amount of apparatus to an operational minimum.

The proposal is for the proposed installation of a telecommunications base station comprising 3 no antenna on 4.8m / 3.8m support poles together with 1 no equipment cabinet and ancillary development thereto on the rooftop of 58 Kingsway.

The operator is seeking to maintain existing services and provide enhanced 4G coverage and capacity to the surrounding area as well as new 5G services for Vodafone to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

The replacement site is required to fundamentally allow the operator Vodafone to continue to provide access to existing legacy services as well as the latest 4G coverage and capacity and new 5G services.

The equipment has been designed so that it resembles as closely as possible other items of rooftop infrastructure which are commonly found within an urban streetscene. Please refer to the attached photomontages which form part of this submittal pack.

58 Kingsway is a multi storey building with additional varied roof levels. The building mass of 58 Kingsway and significant existing plant screen will ensure that the antennas will not be incongruous from ground level. This is amply demonstrated by the photomontages which part of this submittal pack.

The proposed antennas are to be located atop of the main roof level and will be set back from the immediate roof edges. The location of the proposed works comprises a small area of the roof of 58 Kingsway. At present this area is unoccupied and is adjacent to acoustic

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screening erected in the 1980s, with existing plant work located behind this screen. The equipment will be viewed in the context of the existing roof-based paraphernalia and as part of the existing built fabric which will reduce the visual impact of the antenna.

The height and position of the antenna on the building are so that they can be justified from a technical perspective as the antennas need to clear the immediate roof so as not to create signal clipping and reflection. The height of a proposed antenna has to be offset against its positions on the roof, whereby the closer to the centre of the roof of the building the more height that is needed to clear the immediate roof space in front of the antenna. The pole mounted design enables the operators to provide the multiple technologies and meet their full coverage requirements to the target area within the permitted ICNIRP guidelines.

Furthermore, if the antennas were to be any lower, they would be blocked from obtaining a clear line of sight and therefore would not be able to operate effectively reducing the ability of the antennas to provide replacement services and enhanced 4G services as well as providing new 5G coverage to the immediate area.

The height is a direct requirement due to the fact that the taller a site the further it can send signal, and this negates the need for additional sites to pick up the shortfall.

The equipment cabinet will be set back from the roof edge on steel grillage. The equipment cabinet has therefore been sited to minimise the appearance of the equipment on the building as far as possible. The cabinet is proposed to be coloured RAL 7038 but can be painted to colour match the existing built form.

58 Kingsway is broadly the same height adjacent buildings. Whilst it is considered that 58 Kingsway makes a positive contribution to the Kingsway Conservation Area, the location of the application proposals makes no contribution to the aesthetic interest of the building, and is purely functional and utilitarian in character being located adjacent to a significant plant screen. It is therefore considered that views from and into the Kingsway Conservation Area would not be detrimentally affected by the introduction of this additional rooftop equipment given their position at height within the context of existing plant screen and viewed within the context of the existing rooftops where there is existing plant equipment in situ. This is amply demonstrated by the photomontages which form part of this submittal pack.

The technical requirements of mobile communication operators such as the applicant are acknowledged in the National Planning Policy Framework which states that local planning authorities should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.

Placing masts near similar structures and utilising simple and unfussy designs is acknowledged in the 'Code of Practice on Wireless Network Development in England' to be less likely to dominate and be in discord with the landscape and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area. This design is considered to be an appropriate solution and shows the applicants efforts to help mitigate the proposals

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impact on the visual amenity. One of the fundamental aspects of the NPPF is a reduction in the proliferation of sites.

As noted above NPPF advises *"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. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate".*

A number of alternative designs have been considered as set out below:

Reduce antenna numbers	Due to the technical requirement of the operators, the number of antennas cannot be reduced. 3 no antennas are needed here to provide replacement 2G, and new 4G and 5G coverage for Vodafone, thus a further reduction in antenna numbers is not possible.
Face mounted antenna on elevations	Face mounting antennas on the elevations of 58 Kingsway was considered but rejected due to ICNIRP compliance. The height and position of the antennas in the current proposal is the minimum height needed to ensure both coverage and ICNIRP compliance.
Pole mounted antenna at the edge of the building	If the antenna were located at the edges of the building the proposals would be more prominent in the streetscene.
Stub Mast	A stub mast would appear bulkier than the proposed pole mounts and has therefore been discounted on visual grounds.

The following Scenarios extracted from the Code of Practice set out basic siting principles.

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Scenario 1.

X

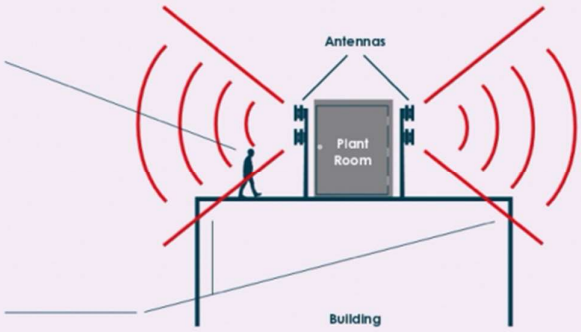
Antennas are of low elevation and set back from the rooftop edge.

The International Commission on Non-Ionizing Radiation Protection (ICNIRP) has developed exposure limits adopted by the UK Government. All mobile network operator installations are designed to comply with the ICNIRP exposure limits as adopted in European Union directives and UK legislation.

This scenario might be considered the most visually sympathetic solution as antennas are both set back from the rooftop edge and are of lower elevation. However, the below example is not an ICNIRP compliant design, and therefore would not be proposed.

The person shown is within the exclusion zone – this is not ICNIRP compliant, as the antennas are too low.

With the antennas positioned here "clipping" occurs. This is when the radio frequency signal propagation from an antenna 'clips' the building edge and would result in exclusion zones over sections of the rooftop. This will impact radio performance and service provision to the point that the solution is not viable.



Each Scenario is indicative and a simplified version to demonstrate the technical constraints and solutions. Although 2D was used for simplicity, antennas must be carefully sited at locations on a building to provide 360 degree coverage, and must always be ICNIRP compliant.

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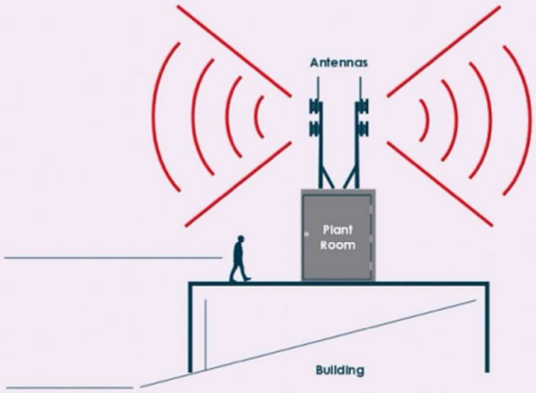
Scenario 2.

Antennas are set back from the rooftop edge and must be elevated.

This scenario is sometimes considered a more visually sympathetic solution, as the antennas are sited away from the rooftop edge. This solution means the antennas must be placed higher, which typically requires more robust support structures, and the essential additional height and bulk can be less desirable in some situations.

The person is accessing the rooftop and is not in the exclusion zone. As the antennas are of sufficient height, there is no RF 'clipping' and the rooftop remains accessible, which may be necessary for access to plant, maintenance or fire escape. The rooftop is safe to access and this ensures that the design remains ICNIRP compliant.

No rooftop edge clipping occurs – ICNIRP compliance is achieved, and there will be no impact upon radio performance or service provision – the design solution remains viable.



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Technical Information

Health and Safety - including ICNIRP compliance
An ICNIRP certificate is provided as part of this application.

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, Vodafone operates their networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of Vodafone'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	**Yes**	~~No~~

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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.		

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

A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

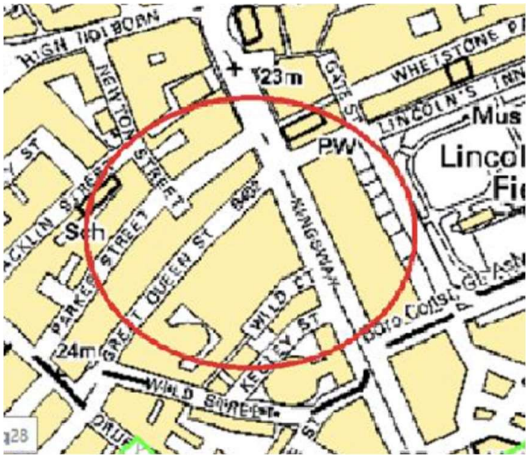

Image 6: Search Area

There is a specific requirement for a replacement radio base station at this location to allow Vodafone to provide replacement 2G, enhanced 4G and new 5G coverage and capacity in and around this area of Kingsway, adjacent to Holborn London Underground station, the

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A40 which is a major arterial route, the British Museum and Lincoln Inn Fields within the Central Activities Zone. This ensures high quality indoor service provision is maintained and enhanced. See Image 6 above.

Mobile connectivity and service is required where customers live, work and play. 5G coverage and superfast mobile broadband data capacity demand will continue to increase exponentially with the introduction of IoT (Internet of Things), machine to machine connectivity, automated transport/industry and other 'smart' applications.

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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)

In accordance with the licence obligations and advice in the National Planning Policy Framework and the 'Code of Practice for Wireless Network Development in England' the applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

- Upgrading their own existing base stations;
- Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location;
- **Installations on existing high buildings or structures;**
- Using small scale equipment; and finally Erecting a new ground based mast site – (1st) Camouflaging or disguising equipment. (2nd) A conventional installation e.g. a lattice mast and compound.

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution. New sites are only developed where there are no viable or accessible alternatives or it is the local planning authority's preferred approach. The feasibility of the acquisition, build and maintenance of the site also needs to be taken into account.

In accordance with the above sequential approach, the proposal is to install a replacement radio base station in this location to provide replacement 2G and enhanced 4G as well as new 5G service provision.

Site	**Site Name, Address, NGR, Site Type**	**Reason for not Choosing**
ETS (D1)	Kingsway House, WC2B 6QY (NGR: E530545 N181395)	This is the NTQ site where the operator is currently located. However, it is no longer available. The site will soon have to be decommissioned.
RT (D2)	Africa House, WC2B 6BG (NGR: E530577 N181456)	As the building is a Listed Building development of this heritage asset should be avoided and other locations are considered to be more appropriate to deliver the required level of coverage to the target area.
RT (D3)	Church of St Anselm, WC2A 3JA (NGR: E530586 N181427)	The rooftop is too low in order to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.
RT (D4)	Queen Mary University of London, School of Law, WC2A	The rooftop is too low in order to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.

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	3JB (NGR: E530608 N181420)	
RT (D5)	40-46 Kingsway, WC2B 6EL (NGR: E530611 N181355)	An installation at this location is considered to be too prominent and other alternatives exist which are more appropriate in order to deliver the required coverage to the target area. This site has therefore been discounted for this reason.
RT (D6)	77-89 Kingsway, WC2B 6SR, (NGR: E530569 N181318)	It is not possible to utilise this existing structure in order to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.
RT (D7)	67-75 Kingsway, WC2B 6ST (NGR: E530579 N181318)	The rooftop is too low in order to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.
RT (D8)	45-59 Kingsway, WC2B 6TE (NGR: E530584 181215)	As the building is a Listed Building development of this heritage asset should be avoided and other locations are considered to be more appropriate to deliver the required level of coverage to the target area.
RT (D9)	45-65 Kingsway, WC2B 6TD (NGR: E530598 N181279)	As the building is a Listed Building development of this heritage asset should be avoided and other locations are considered to be more appropriate to deliver the required level of coverage to the target area.
RT (D10)	New Brook Buildings, Great Queen Street, WC2B 5DH (NGR: E530483 181346)	A mast at this location would not provide the required level of coverage to the target area due the substantial buildings that would inhibit the signal and would not deliver the required coverage to the target area. This site has therefore been discounted for this reason.
RT (D11)	New Brook Buildings, Great Queen Street, WC2B 5DH (NGR: E530515 181367)	A mast at this location would not provide the required level of coverage to the target area due the substantial buildings that would inhibit the signal and would not deliver the required coverage to the target area. This site has therefore been discounted for this reason.
RT (D12)	Hexagon Apartments at 33 Newton Street, WC2B 5EL (NGR: E530485 N181393)	A mast at this location would not provide the required level of coverage to the target area due the substantial buildings that would inhibit the signal and would not deliver the required coverage to the target area. This site has therefore been discounted for this reason.
RT (D13)	53 Parker Street, WC2B 5PT (NGR: E530520 N181423)	The rooftop is too low in order to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.
RT (D14)	111 – 117 Kingsway, WC2B 6PP (NGR: E530532 N181433)	The rooftop is too low in order to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.
RT (D15)	City Barbers, Newton Street, Seven Dials, Holborn, WC2B 5ES	Due to the construction of the building, there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area.

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	(NGR: E530463, N181413)	
RT (D16)	King's College London, Strand Campus, Strand, St Clement Danes, Holborn, WC2R 2LS (NGR: E 530669, N181237)	An installation at this location is located too far out of the search area to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.
RT (D17)	Waterman House, 41, Kingsway, Gray's Inn, Holborn, London, WC2B 6XG (NGR: E530637, N181178)	An installation at this location is located too far out of the search area to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.
RT (D18)	Holy Trinity Church, 125, Kingsway, Gray's Inn, Holborn, London, WC2B 6SE (NGR: E530500, N181497)	An installation at this location is located too far out of the search area to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.
RT (D19)	Asadal, 227, High Holborn, Gray's Inn, Holborn, WC1V 7EG (NGR: E530542, N181513)	An installation at this location is located too far out of the search area to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.
RT (20)	Caffè Nero, 77D, Kingsway, Gray's Inn, Holborn, WC2B 6SR (NGR: E530559, N181364)	There is no space on the roof on which to locate the operator's apparatus and provide the necessary coverage to the target coverage area.
RT (21)	Great Queen Street, Seven Dials, Holborn, London E530508, N181312)	Due to the construction of the building, there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area.

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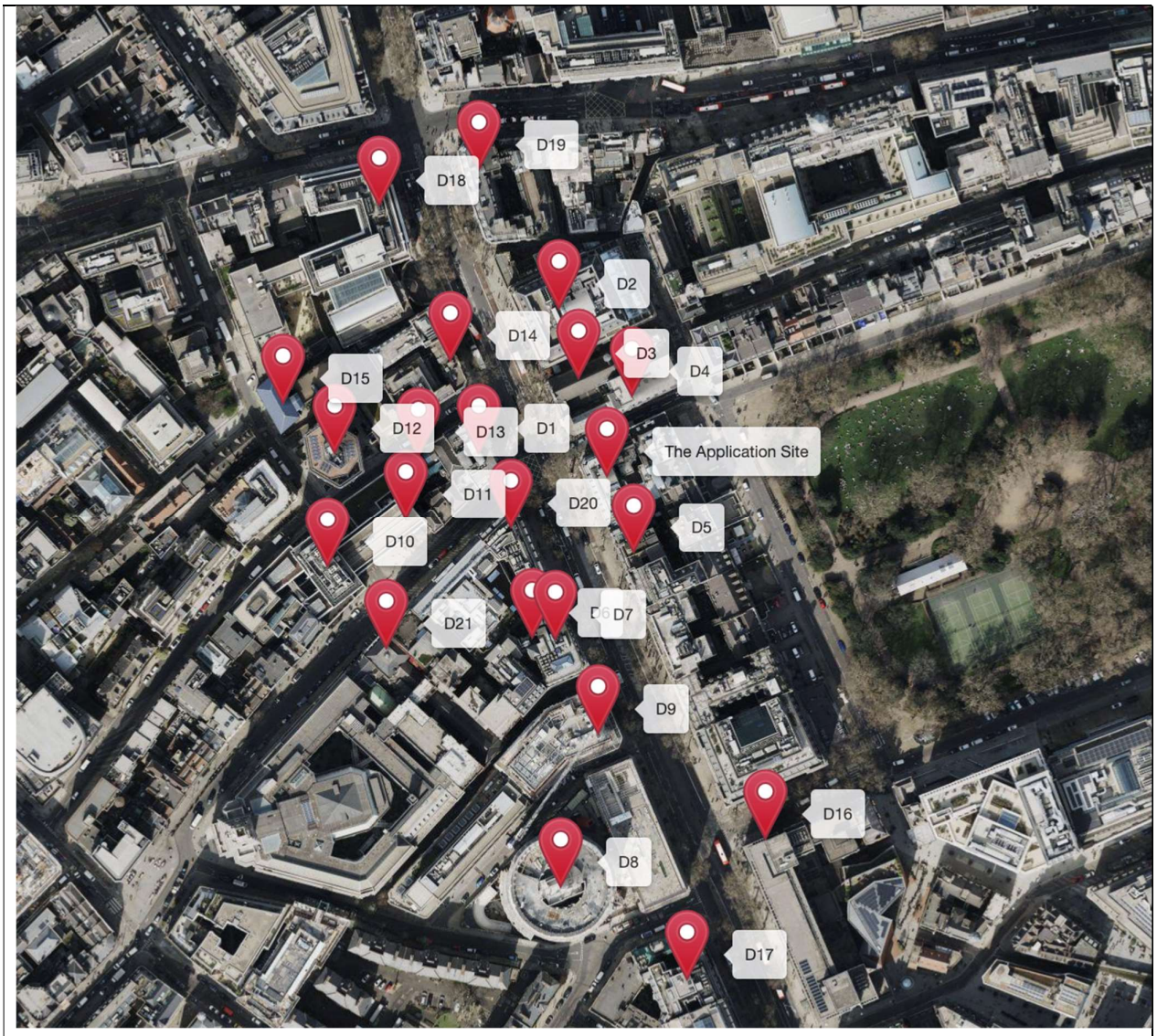

Image 7: Discounted options (Source – Grid Reference Finder)

https://gridreferencefinder.com/#gr=TQ3054581395|D1|1,TQ3059981387|The_s_Application_s_Site_s_|1,TQ3057781456|D2|1,TQ3058681427|D3|1,TQ3060881420|D4|1,TQ3061181355|D5|1,TQ3056981318|D6_s_|1,TQ3057981318|D7_s_|1,TQ3058481215|D8|1,TQ3059881279|D9_s_|1,TQ3048381346|D10_s_|1,TQ3051581367|D11|1,TQ3048581393|D12|1,TQ3052081393|D13|1,TQ3053281433|D14_s_|1,TQ3046381413|D15|1,TQ3066981237|D16_s_|1,TQ3063781178|D17_s_|1,TQ3050081497|D18_s_|1,TQ3054281513|D19_s_|1,TQ3055981364|D20_s_|1,TQ3050881312|D21|1

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

N/A

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Land use planning designations:

The site is located within the Kingsway Conservation Area and within the setting of listed buildings as illustrated in images 3 and 4 above.

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

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

It is not necessary to quote extensively from this document, but the following points are highlighted.

National Planning Policy Framework (December 2023)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The NPPF was updated in July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. It was most recently updated again in December 2023, in relation to a number of themes including; flexibility for planning authorities in local housing need, clarification of Green Belt boundary alterations and acceptable brownfield development within the Green Belt. It strengthens the importance of building 'beautifully' and respecting the character of an area. It removes the need for annual five-year land supply updates, and protects neighbourhood plans from speculative development for five years. Also, the update encourages community-led and self-build developments and further protects agricultural land in its availability for food production. The update does not change any parts relating specifically in relation to telecommunications.

The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 118 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

The NPPF continues to support the expansion of electronic communications networks at paragraph 118. It notes that policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and

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upgraded over time. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF supports the expansion of telecommunications:

> *"Planning policies and decisions should support the expansion of electronic communications networks…"* (para. 118).

Paragraph 119 of the NPPF sets out the requirement to minimise the number of installations consistent with the efficient operation of the network and also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 122 of the NPPF retains guidance from a previous NPPF version which relates to local planning authorities determining 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.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or 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 the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 38 it 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…***permission in principle***, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible"* (emphasis added).

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 85 states:

> *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges*

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> *of the future. This is particularly important where Britain can be a global leader in driving innovation[42]"…*

Footnote 44 of the NPPF states:

> *"The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future."*

The NPPF provides guidance on proposals affecting heritage assets. Paragraph 194 states that *"in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'*

Paragraph 198 goes on to state that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset).

The NPPF goes on to provide guidance on considering the potential impacts of development on heritage assets. Paragraph 200 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 207 retains advice provided in the 2012 version of NPPF relating to the degree of harm. It states that *'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.'*

Public benefits are defined within the NPPF and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Code of Practice for Wireless Network Development in England

The Code of Practice provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. It is also a useful tool for other interested stakeholders

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such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The aim of the Code of Practice is to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

The Code of Practice covers all forms of wireless infrastructure development, including mobile masts and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

The CoP sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraph 8 of the revised Code acknowledges that connectivity is vital to enable people to stay connected and that fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code continues to acknowledge that as the demand for mobile data in the United Kingdom is increasing rapidly, and that it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

The Government recognises the role of Planning in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity.

Paragraph 13 of the Code continues to echo the NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth. More specifically that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G) in order to support economic growth across the country.

The CoP sets outs 'How wireless networks function.

Para.16. states *"Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much data can be carried over the network. Depending on the radio frequencies used, base*

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stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth".

Para. 17 sets out that *"Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications".*

The CoP establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support by.

Para. 18 states *"Operators should develop their networks and install wireless infrastructure according to the following principles and commitments:*

- ***Site sharing and use of existing infrastructure**: make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites 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.*
- ***Consultation with local planning authorities, local communities and other stakeholders**: participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high-quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see Pre-application consultation with local communities below).*
- ***Standardised and high-quality approach to planning applications, and the notification procedure**: provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements. Ensure planning submissions are of high-quality and provide the necessary evidence to support the application (as per the NPPF).*
- ***Prompt responses to enquiries**: respond to complaints and enquiries within a timely manner (see Review and Enquiries section below).*
- ***Siting and Design**: wireless infrastructure should be deployed in accordance with the guidance set out within this Code of Practice. Where appropriate, equipment should comply with the principles set out in the NPPF and consider any local planning policies, including any local and national design codes. When located in protected landscapes and other designated land, the sensitive nature of these areas must be considered.*

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- ***Removal of redundant equipment and site restoration:*** *ensure that when infrastructure is upgraded, any equipment that is made redundant by the upgrade, such as brackets, is removed to benefit the local environment. Where a whole site is no longer in use, the site should be restored to its original state.*
- ***Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure levels guidance****: as required by spectrum licences, comply with international guidelines for limiting exposure to electromagnetic fields (EMF) - including, as set out in the NPPF, providing a statement that self-certifies that ICNIRP guidelines will be met with all applications (see Annex C).*

Paragraph 19 states that Local Planning Authorities should demonstrate their support by:

- ***"Incentivising connectivity****: support the expansion of telecommunications networks and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.*
- ***Facilitating sites****: engage with operators when new sites have been proposed and discuss site requirements.*
- ***Engagement with operators****: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.*
- ***Information and communication****: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)".*

The added emphasis on support from Local Planning Authorities in the deployment in digital infrastructure is even more evident in the revised CoP. The CoP recognises the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that *'In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement'.*

Siting and Design Principles

The government's objective is to deliver high quality, reliable wireless infrastructure whilst ensuring the impact of new network development is kept to a minimum. The siting and design of wireless network infrastructure is central to achieving this. The CoP acknowledges that *'good siting and design principles should apply to all wireless network development and take into account any site specific considerations and context. Both can create better places in which to live and work and help make development acceptable to communities'.*

The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity

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requirements. The guidance includes at Para. 22 '*the choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible*'.

Para. 23 confirms that there should be a ***'presumption in favour of facilitating sustainable network development'*** and, as such, operators and local planning authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and find viable solutions to deployment issues (emphasis added).

Paragraphs 24 - 27 sets out general siting and site selection principles which Operators should consider. The CoP acknowledges at Para. 24 that '*Operators use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G, 4G and now 5G. Once an operator has identified a requirement for a new cell site, a suitable site needs to be found. Elements that make a site favourable include: having existing or ready access to a power supply, access to fibre optic cables, vehicular access, and, other buildings and development which may provide a level of existing screening. Operators will typically look to upgrade existing infrastructure prior to considering a new deployment, in particular for initial 5G deployment*'.

Para 25 notes that '*When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to identify potential options which meet their requirements. Operators should follow these general siting and site selection principles:*

- *Installation on existing buildings and structures;*
- *Erecting new ground based masts;*
- *Camouflaging or disguising equipment where appropriate;*
- *Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage); and*
- *Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator)*'.

Para. 26 highlights that the installation of all wireless infrastructure requires a balanced approach between the technical needs and constraints of the proposed site and the potential impact of the development. The three key technical and operational considerations for installation sites are:

- **Coverage**: wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.
- **Capacity:** where existing network infrastructure can no longer meet the demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.

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- **Backhaul**: the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.

Para 27 requires that Local Planning Authorities consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. Para. 27 further considers that in general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations

In respect of 'Design', the CoBP at Para 28 acknowledges that the siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact including

- Protecting visual amenity
- Mitigating visual impacts

Para. 29 acknowledges that these factors along with location and the coverage and capacity requirements can influence the type of infrastructure structure that is deployed and requires that '*planning authorities should be aware of these constraints when considering proposals. In particular:*

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*
- *In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage. The location of masts can sometimes be dictated by access to transmission links back to the operator's main network and proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain'.*

The CoP establishes radio equipment housing (cabinets) principles. The CoP at Para. 30 states that "*cabinets protect radio transmitters and receivers, provide the power source for mobile equipment, and are connected to antennas via cables. Equipment cabinets are likely to be needed at most sites. The cabinets must be of sufficient size to facilitate hosting various operating equipment whilst also allowing air circulation to reduce the potential for overheating*". The CoP establishes the planning and visual considerations for siting radio housing. These include:

- Colouring
- Siting on highways and footways:
- Highway safety:

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- Listed buildings/ scheduled monuments and Conservation Areas:
- Access
- Trees

Local Policy

The Local Plan for the area comprises:

- The London Plan (Adopted 2021)
- Camden Local Plan (Adopted 2017)

The London Plan 2021

The London Plan 2021 is the new Spatial Development Strategy for Greater London and was adopted in March 2021 and is now part of the statutory development plan. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. Chapter 1 of the London Plan deals with 'Planning London's Future - Good Growth'. Para.1.0.1 relates to 'Good Growth' that is "*socially and economically inclusive and environmentally sustainable and underpins the whole of the London Plan and each policy. It is the way in which sustainable development in London is to be achieved*".

Para 1.1.4 under 'Building Strong & Inclusive Communities' includes: '*… social, physical and environmental infrastructure that meets London's diverse needs is essential if London is to maintain and develop strong and inclusive communities.*' The corresponding policy in GG1 Building strong & inclusive communities states:

> *'Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:'*
>
> *'… C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation D seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city'*
>
> *'I support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.'*

Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities.

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Para. 1.3.1 states *'The mental and physical health of Londoners is, to a large extent, determined by the environment in which they live. Transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by the planning system, and local authorities are accordingly responsible for planning and public health'.* During the Covid-19 pandemic there has been a much greater reliance on mobile digital connectivity to stay connected with family and friends and has become has enabled working from home and home-schooling. Without the infrastructure which enables reliable connectivity, we could not stay connected.

Policy GG5 relates to 'Growing a good economy. The supporting text states:

> *'…..London is the engine of the UK economy, accounting for more than a fifth of the country's economic output. Its labour market, housing market and transport links are interconnected with the Wider South East city region, which shapes the development of the whole of the UK. Together, London and the Wider South East contribute a full half of the country's output. London has unique strengths in specialist fields like finance, business services, technology, creative industries and law, as well as attracting tourists from around the world, providing a gateway to the rest of the UK. The wealth this generates is essential to keeping the whole country functioning, but the benefits of economic success are not shared evenly within London itself.'*
>
> *'… Projected growth towards 6.9 million jobs by 2041 provides an opportunity to strengthen London's economy for the future, and doing so will depend on increasing diversification. The Central Activities Zone and Northern Isle of Dogs will remain vital to London's economic success, but growth in town centres across London will be equally important, alongside supporting local regeneration, investment in Opportunity Areas and enabling access to a wide range of jobs. Reasonably-priced, good quality employment space will be needed across London to make this happen'.*

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. Convenient transport connections and street, rail and waterway networks that allow the efficient movement of goods and people are also vital, alongside the schools, healthcare facilities and other amenities that employees need to be healthy and productive.'

GG5 'Growing a good economy' states:

To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

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'… D ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth
E ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning'
'… H recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success."

The proposed base station installation is critical infrastructure which will provide world class digital connectivity which will support the digital economy. Reliable mobile digital connectivity supports London's growth, and contributes to the low carbon economy by enabling flexible working amongst other things. In terms of supporting London's role in innovation toward growing a good economy.

Policy SD4 relates to the 'Central Activities Zone (CAZ)' and states:

'A The unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions and local uses, should be promoted and enhanced.
B The nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.
C The distinct environment and heritage of the CAZ should be sustained and enhanced.
D Taking account of the dense nature of the CAZ, practical measures should be taken to improve air quality, using an air quality positive approach where possible (Policy SI 1 Improving air quality) and to address issues related to climate change and the urban heat island effect'.
E The unique concentration and diversity of cultural, arts, entertainment, nighttime economy and tourism functions should be promoted and enhanced.
F The vitality, viability, adaptation and diversification of the international shopping and leisure destinations of the West End (including Oxford Street, Regent Street, Bond Street and the wider West End Retail and Leisure Special Policy Area) and Knightsbridge together with other CAZ retail clusters including locally-oriented retail and related uses should be supported.
G The CAZ as a centre of excellence and specialist clusters including functions of state, health, law, education, creative and cultural activities, and other more local Special Policy Areas should be supported and promoted.
H The attractiveness and inclusiveness of the CAZ to residents, visitors and businesses should be enhanced, including through public realm improvements and the reduction of traffic dominance, as part of the Healthy Streets Approach (see Policy T2 Healthy Streets).
I Infrastructure to sustain and enhance the CAZ and its agglomeration of strategic functions including its public transport and digital connectivity and its potential to accommodate new development should be secured.
J The safety, security and resilience of the CAZ should be promoted working with businesses and communities.
K The quality and character of predominantly residential neighbourhoods, where more local uses predominate, should be conserved and enhanced.

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L Development of social infrastructure that meets the distinct needs of the CAZ should be supported. M Sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation and other related service functions within or close to the CAZ and Northern Isle of Dogs to support the needs of businesses and activities within these areas. N In Development Plans, boroughs should: 1) define the detailed boundaries of the CAZ, the Northern Isle of Dogs, town centres (including the International centres), CAZ retail clusters, Special Policy Areas and specialist clusters of strategic functions having regard to the CAZ Diagram shown in Figure 2.16 2) develop locally sensitive policies to meet this Plan's objectives for the CAZ'.

Para. 2.4.1 of the London Plan states: *'The CAZ is the vibrant heart and globally-iconic core of London. It is one of the world's most attractive and competitive business locations. It accommodates one third of London's jobs and generates almost 10 per cent of the UK's output. It contains the seat of national Government and is internationally renowned for its culture, night-time economy, tourism, shopping and heritage. It is also home to more than 230,000 residents. 2.4.2 The density, scale and mix of business functions and activities in the CAZ are unique and are underpinned by the connectivity provided by public transport, walking and cycling networks. This agglomeration results in exceptional levels of productivity, which is not replicated elsewhere in the UK, and provides national benefits. It requires different or tailored approaches to the application of national policy to address its distinct circumstances'.*

Digital connectivity and the benefits it brings to London's global competitiveness now and in the future receives more prominence and importance in the London Plan 2021. Paras 9.6.1 – 9.6.9 encourage the delivery of high-quality / world-class digital infrastructure.

Policy SI 6 relates to 'Digital Connectivity Infrastructure'. Para 9.6.1 states 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***. *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 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'(*emphasis added*)*.

Paragraph 9.6.6 states 'Access for network operators to rooftops of new developments should be supported where an improvement to the mobile connectivity of the area can be identified. Where possible, other opportunities to secure mobile connectivity improvements should also be sought through new developments, including for example the creative use of the public realm'.

Paragraph 9.6.8 states '*The Mayor will work with network operators, developers, councils and Government to develop guidance and share good practice to increase awareness and capability amongst boroughs and developers of the effective provision of digital connectivity and to support the delivery of policy requirements. The Mayor will also help to identify spatial gaps in connectivity and overcome barriers to delivery to address this form of digital*

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exclusion, in particular through his Connected London work. Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their Development Plans'.

The policies relating to Design (Chapter 3) and heritage conservation (policy HC1) seek to promote proposals that are of *'good design'* and are sympathetic to the heritage assets and their surroundings. The proposed base station is well positioned and of a scale, appearance and shape that responds to the local context and historic assets while also acknowledging the area's social and economic needs.

Cornerstone's infrastructure and Vodafone's network are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

Camden Local Plan (2017)

The Local Plan was adopted by the Council in 2017 and sets out policies and guidance for the development of the borough until 2031. The Council's vision for the borough is set out in the Camden Plan which also acts as the vision for the Local Plan. It states:

> *"We want to make Camden a better borough – a place where everyone has a chance to succeed and where nobody gets left behind. A place that works for everyone".*

Policy D1 relates to design and sets out the criteria against which proposals will be assessed.

The first two criteria of the policy are considered relevant to the applicants' proposal and state:

> *The Council will seek to secure high quality design in development. The Council will require that development:*
> *a. respects local context and character;*
> *b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage*

Policy D2 deals with Heritage in Camden and has a specific section on Conservation Areas. An assessment of the appeal proposals against this policy is included in the Heritage Impact Assessment. The criteria that are considered relevant to the applicants' proposals are:

> *"Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.*

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The Council will:
e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and

Para. 2.1 states "*Camden, along with London as a whole, is experiencing significant change, with substantial population growth and increases in demand for housing and employment*". Para. 2.2 confirms that the "*Council's objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, while ensuring that growth delivers opportunities and benefits for our residents and businesses. This plan aims to deliver sustainable growth while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit*".

Policy G1 deals with 'Delivery and location of growth'. Policy G1 sets out the conditions to create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.

The Local Plan does not have a policy that is directly relevant to the installation of telecommunications in the Borough. Paragraph 5.10 'Digital Infrastructure' which is included in the supporting text for Policy E1 – 'Economic Development' states that the "*Council recognises the importance of digital infrastructure including telecommunications*". Indeed recognising the importance of Digital Connectivity, the Mayor for London through the Greater London Borough Authorities has amended planning application forms in order to monitor 'Mobile Connectivity' and the implementation of London Plan Policy SI 6, in order to help avoid recurring situations like the one the appeal site is to help rectify.

Moreover, it explicitly recognises under Para. 2.5 of the Local Plan the key priorities for harnessing the benefits of growth the need for '*securing the infrastructure and services to meet the needs of our growing number of residents, workers and visitors*' with infrastructure needs including digital infrastructure requirements then identified in Appendix 1 which in turn references the Camden Digital Strategy 2014, again demonstrating the participation of the planning process in supporting digital connectivity via '*Improved internet access through the acceleration of high speed connectivity, including public wireless systems.*'

Digital Camden (2014)

The strategy was published in 2014 and sets out a series of actions to support the uptake of high quality, next generation connectivity. It prioritised '*creating the conditions for and harnessing the benefits of economic growth*' including '*stimulate an expansion of high-speed internet access across the Borough...*'.

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Having a digital strategy in 2014 shows that wider Camden Council was a leading proponent of the UK Government's Digital Strategy initiative and understood even then the economic benefit of good quality communications services.

This was detailed in the document UK Digital Strategy A new approach to digital change for our borough (2016), in which Camden set out '*We believe it's about enabling the transformation of government, business and society for the better*.' Under the Unlocking Growth recommendations for the UK Digital Strategy Recommendation 6: '*The UK Digital Strategy needs to continue focusing on accelerating superfast connectivity which is particularly poor within inner London as well as incubating the rollout of next generation mobile and telecommunications connectivity to enable ubiquitous access to the internet and greater competition. Central and local public service estate should be used to boost connectivity, following Camden's 'digital rooftops' initiative.*' With regard to Smart Cities, it says '*Alongside this a whole new wave of service innovation is being driven through the digitisation of our lives with cars, health monitors and mobile phones providing vast amounts of information that offer fundamentally different and disruptive ways of delivering services.*'

Camden Planning Guidance Design

The planning guidance document is intended to support the policies of the Local Plan and is a material consideration in determining planning applications.

The Draft guidance states that it does not specifically apply to telecommunications as they are considered in other guidance. However, there is a section in the guidance which is relevant to Heritage and looks at integrating new development with heritage assets. The guidance states that:

> "*Development proposed to a heritage asset or in close proximity to a heritage asset is informed through understanding of its sensitive context, the historic environment and the significance of the heritage asset and its setting.*
>
> *The Council expects that development not only conserves and avoids harm but also takes opportunities to enhance or better reveal the significance of heritage assets and their settings. Development must respect local character and context and seek to enhance the character of an area where possible*".

The guidance has not been written with specialist telecoms infrastructure in mind and the design of the proposed equipment cannot be altered due to the technical requirements. The antennas have been positioned on the building to enable their effective operation, and have been set back from the roof edge at the lowest possible height to minimise their appearance. An expectation that all development affecting heritage assets 'avoids harm' is a high threshold and not reflective of the requirement to provide connectivity to all areas, including heritage areas, via suitably designed and functional infrastructure which is simply not addressed by these policies. When considering the appropriateness of telecommunications development proposals, it is imperative that Decision Makers give precedence to telecommunications specific policy where it exists. If it does not exist at a local level, or if the

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policy is out of date, then the NPPF must prevail. One must also appreciate that it is extremely unreasonable to expect niche infrastructural development to strictly adhere to more general policy criteria.

Camden Planning Guidance Amenity

The planning guidance document is intended to support the policies of the Local Plan and is a material consideration in determining planning applications but makes no reference to telecommunications.

The section on outlook is the only section that can relate to the proposed development and states:

"Outlook is the visual amenity enjoyed by occupants when looking out of their windows or from their garden. How pleasant an outlook is depends on what is being viewed. For example, an outlook onto amenity space is more pleasant than an outlook across a servicing yard. Particular care should therefore be taken if the proposed development adjoins properties with a single aspect. Any unpleasant features should be screened if possible, for example with permanent landscaping.

Developments should ensure that the proximity, size or cumulative effect of any structures avoids having an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers. The location of bin or cycle stores, for example, should be carefully considered if they are in close proximity to windows or spaces used by occupiers.

It should be noted that the specific view from a property is not protected as this is not a material planning consideration".

UK Wireless Infrastructure Strategy, April 2023

In April 2023, the UK Government published the 'UK Wireless Infrastructure Strategy'[1], a plan for delivering world-class digital infrastructure which the government identifies as an essential enabler for its 5 priorities of building a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across the country. In her foreword, the Rt Hon Michelle Donelan MP, Secretary of State for Department for Science, Innovation and Technology, provides context for the strategy:

*"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 progress in everything from real time travel information to augmented reality*

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navigation and self-driving buses and taxis…. This is an incredible opportunity; widespread adoption of ***5G could see £159 billion in productivity*** *benefits by 2035".*

The Future Telecoms Infrastructure Review, 2018 sets out the ambition of the Government for the UK to become a world leader in 5G technology and ensuring world class connectivity for all. This ambition was reaffirmed in the 'UK Wireless Infrastructure Strategy', published in April 2023 which states in the Executive Summary:

> *"The next decade will see seismic changes both in terms of what wireless connectivity can deliver and how we can use it. The economic and social benefits from these changes promise to be vast, from supercharging growth to accelerating our transition to net zero. But these benefits can only be achieved with concerted action from government, industry, and others".*

The Foreword of the 'UK Wireless Infrastructure Strategy' by Julia Lopez MP 'Minister of State for Department for Science, Innovation and Technology' states inter-alia:

"The more our lives are conducted online, the more access to the internet becomes critical for social and economic opportunity.

This is why 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.

It is this sense of purpose that underpins Project Gigabit, our flagship £5 billion programme to reach hard-to-reach communities across the UK with gigabit-capable broadband. It is complemented by a staggering competition now underway between commercial suppliers to supply Britons with great connectivity.

Extraordinary progress is being made on coverage. When I began my role in September 2021, gigabit coverage was just over 50%. Now, it stands at almost 75%. With £1bn of Project Gigabit's funding now available to suppliers, our contracts are not just delivering better internet but skilled jobs everywhere from Blandford to Berwick. By the end of next year, we hope to have every part of our country under contract.

Which is why the time is right to turn our sights to mobile connectivity, where the same sense of mission is needed to deliver the kind of wireless infrastructure that will transform how we live our lives and run our economy. This is not simply a matter of improving download speeds as people browse the internet on their phones or dial into work calls. It is far more transformative than that'.

The UK Wireless Strategy states that '4G technology revolutionised the way people use their mobile phones. What today is considered normal, a decade ago was ground-breaking. We

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have seen the growth of streaming services, like Netflix and Spotify, and gained constant access to high-quality, user-produced content for free on platforms like YouTube, transformed the way we shop online, travel around cities through access to apps like Uber and Bolt and use public services, such as booking NHS appointments through apps'.

The UK Government in the UK Wireless Infrastructure Strategy' recognises that 'growth in the digital sector is nearly 6 times faster than across the economy is a whole.

Connected Nations Report 2022

The Connected Nations Report 2022 was published in December 2022. It states:

"5G rollout is expanding. EE, Virgin Media O2, Three and Vodafone have continued to extend their 5G networks across the UK, and we are reporting individual mobile network operator (MNO) coverage for the first time, based on the High to Very High Confidence range which we established in 2021. These ranges cover an increasing probability that the coverage predicted by MNOs will translate into coverage on the ground. As noted above, the level of coverage provided outside of premises by at least one mobile network operator across this range is now at 67-77% (up from 42-57% last year). The coverage provided outside of premises from individual MNOs ranges from 39-58% at High Confidence, with a range of 31-45% at our Very High Confidence level. Though most 5G sites are focused around busy urban areas - providing additional capacity to existing mobile data services - we're now seeing coverage extending into smaller towns and other high footfall locations. The distribution of this investment remains broadly similar to last year, with 86% of sites in England, 8% in Scotland, 4% in Wales and 2% in Northern Ireland".

Connected Nations update: Spring 2023

The Connected Nations update: Spring 2023 report was published in May 2023. This is the first interim update to Ofcom's Connected Nations 2022 report. It is based on mobile coverage and fixed broadband availability across the UK as of January 2023. The report acknowledges that there has not been a significant increase in coverage since the December 2022 report, but the industry continues to develop its coverage footprint.

"4G: Coverage of 4G mobile networks across the UK has not seen significant changes over the last reporting periods. Around 92% of the UK landmass is predicted to have good outdoor 4G coverage from at least one operator, and this area includes nearly all of the premises in the UK. This is expected to rise to 95% by end of 2025 as a result of the SRN.

4G not-spots: The UK has both geographic and road not-spots (that is, areas where good 4G services are not available from any mobile operator). Geographic not-spots have remained the same since our December 2022 report at 8%. Road coverage remains largely the same with just 4% of all roads estimated to be an in-vehicle not-spot. This varies significantly across individual nations, particularly in Scotland and also in Wales. Wales has benefited by a percentage point drop in geographic notspots since our December report, which we attribute to the SRN scheme.

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Calls and text coverage: As with 4G, predicted coverage for calls and text services remains largely unchanged over the previous reporting periods. The range of predicted coverage by MNOs varies from 85-93% of the UK landmass, depending upon operator. In addition, 99% of all UK premises are predicted to have coverage for outdoor voice calls from all MNOs.

Calls/text not-spots: Areas where people are unable to make a call or send a text from any operator (not-spots) is similarly unchanged, with around 4% of the UK geography estimated as a not-spot, and around 2% of the UK's roads estimated to be a not-spot for calls and texts made or received in vehicle. As with 4G, there are marked variations for individual nations; for example, geographic notspots across Scotland remain higher than for the rest of the UK, at around 10%.

5G: We continue to report on 5G coverage (outdoors premises) from 'All MNOs' and from 'At least one MNO', with coverage confidence levels ranging from high to very high. Coverage from 'At least one MNO' now ranges from 73% (very high confidence) to 82% (high confidence) of premises outdoors, up from 67% and 78% respectively when we reported in our December 2022 report".

Connected Nations update: Summer 2023

The Connected Nations update: Summer 2023 report was published in September 2023, and is the second interim update to the December 2022 annual Connected Nations report. It is based on mobile coverage and fixed broadband availability across the UK as of April and May 2023.

The report found that mobile coverage remains stable for 4G, with around 93% of the UK landmass predicted to have good outdoor 4G coverage from at least one operator. 5G coverage continues to edge forward steadily, with 85% of premises being able to get a 5G signal outdoors from at least one mobile network operator. However, the statistics for outdoor coverage on 5G networks from all operators are still very low – in England, only 14-24% of premises benefitted from outdoor 5G coverage from all operators as of April 2023.

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5G coverage

Premises (outdoor) covered by at least one operator	May 2022	September 2022	January 2023	April 2023
UK	54-69%	67-78%	73-82%	76-85%
England	56-72%	70-81%	76-85%	79-88%
Northern Ireland	26-34%	37-44%	48-55%	54-60%
Scotland	48-61%	57-68%	62-73%	66-76%
Wales	35-48%	46-58%	49-61%	53-65%

Premises (outdoor) covered by all operators	May 2022	September 2022	January 2023	April 2023
UK	5-13%	11-20%	12-22%	12-22%
England	5-14%	12-22%	13-23%	14-24%
Northern Ireland	2-7%	4-8%	5-12%	5-12%
Scotland	3-10%	6-15%	7-17%	8-19%
Wales	2-6%	4-7%	5-8%	4-8%

Image 8: 5G coverage statistics (Source: Connected Nations update: Summer 2023 report)

The report also states:

"The UK Government targets for mobile include a target of 95% UK geographic coverage for 4G, and in April 2023 it published the Wireless Infrastructure Strategy where it announced a new ambition for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030."

Online Nation 2022 Report

Online Nation is an annual research report, published for the first time in 2019. Using research produced by Ofcom and others, it looks at what people in the UK are doing online, how they are served by online content providers and platforms, and their attitudes to and experiences of using the internet.

The latest Online Nation 2022 report (published June 2022) found that for most people in the UK, being online is a major part of daily life. Being online allows people to connect with others, sometimes in ways they may not be able to do offline. Data shows how we benefit from a range of online services, from messaging and calling platforms to gaming platforms, online news outlets and online shopping.

The Meta-Owned social media apps (Facebook, Instagram, Whatsapp and Facebook Messenger) made up the top four smartphone apps most visited daily by UK adults in September 2021. The top-reaching smartphone app was Whatsapp (88% of UK online smart-phone using adults) closely followed by the Facebook app (87%). 9

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4% of UK adult internet users aged 16+ said they used an online communications service for making voice/video calls or sending messages in 2021, and 80% of children aged 3-15 did the same.

The 2022 report found that the UK adult internet users spent almost 4 hours online a day in September 2021, with 3 of those hours being spent on smartphones. One in five people only use a smartphone to go online compared to one in ten last year. News and government public services are among the most-visited websites and apps in the UK.

The majority (67%) of UK internet users aged 13+ feel that the benefits of being online outweigh the risks. 43% agree that being online has an overall positive impact on their mental health.

The report found that 60% of children aged 8-15 say that using social media and messaging platforms makes them feel closer to their friends. More than three-quarters of children aged 12-15 said that being online can help with their school/homework, whilst half said it can be used to learn a new skill.

The Online Nation 2022 report acknowledged that the global pandemic since March 2020 has resulted in significant changes in online behaviour. Online shopping habits developed during the lockdown periods have remained. The largest online platforms' revenues and profits increased significantly during the lockdown periods and this growth continued in 2021. The growth is being driven by UK consumers' increased spend on e-commerce and entertainment subscription services, while advertising revenues are also increasing with the continuing brand migration to online.

Figure 1.2 of the Online Nation 2022 report indicates that the percentage of UK online adults accessing the internet, by device, in 2021 was the highest by smartphone at 88%. In September 2021 73% of the time spent online by UK adults per day was on a smartphone.

Figure 1.2: Percentage of UK online adults accessing the internet, by device: 2021

Percentage of adult internet users	Smartphone	Tablet	Laptop	Smartphone only
2021	88%	43%	53%	21%

Source: Ofcom Adults' Media Literacy Tracker 2021: Core survey and CATI omnibus survey. IN1. Which of these devices do you use to go online? (MULTI CODE) Base: All adults 16+ that go online (at home or elsewhere) (excluding those who did not give a response at the postal survey) (3577)

Reproduced from Online Nation 2022 Report

Other relevant information

The table below, taken from Ofcom Adults' Media Literacy Tracker, indicates the most-missed device among adults were it be taken away from them, using data collected 2014-2019. As can be seen, nearly half of all adults say that their mobile device is the device they would miss the most were it taken away from them.

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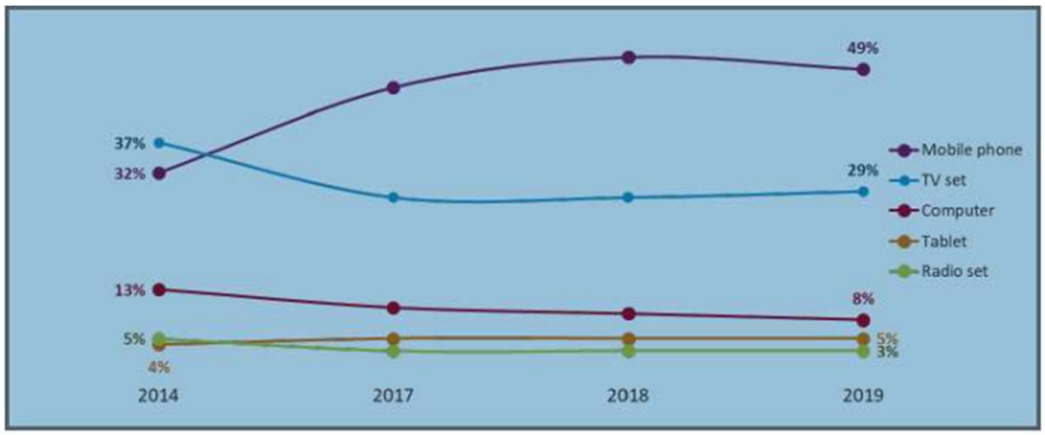

Source: Ofcom Adults' Media Literacy Tracker 2014-2019

More people than ever now rely on their mobile phones for day to day, and even hour to hour, access to services. For example, some people use their mobile phones to monitor their health, such as diabetics. Mobile phones can be a lifesaver in that sense, just as much as being able to call 999 in an emergency.

Planning Issues

The following paragraphs set out how the application complies with the NPPF, The Code of Practice and the Camden Local Plan. The requirement to maintain existing services as well as providing new capacity and coverage is urgently required to provide additional capacity into this economically vital area.

The applicant therefore urges the LPA to work with them to provide this 'replacement' essential infrastructure to ensure London's ongoing competitiveness.

The proposed equipment fully complies with the objectives of the NPPF. Government guidance states that in order to limit visual intrusion the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need of a new site has been justified.

This replacement radio base station will enable Vodafone to maintain legacy services and provide new services in the Kingsway area, in line with the NPPF. The operators' license obligations requires them to meet customers "reasonable demand". Reasonable demand would be to provide indoor coverage as customers expect to be able to use their handsets indoors. The operators also have a competitive market driven "requirement" to provide a high-quality service.

The main matter for consideration is whether the proposed siting, size and design of the telecommunications equipment would be out of keeping with the character and appearance of the mixed-use area, resulting in harm to Kingsway Conservation Area, and

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whether this perceived harm would outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal and other valid material considerations as outlined within NPPF.

Principle of Development

The provisions of the GPDO require the local planning authority to assess the proposed development solely on its **siting and appearance**.

The principle of development has been established by the Government when the new permitted development rights came into force in November 2016 and again in April 2022, which enables sites such as this one to be built, with prior approval for siting and appearance being the only matters that the local planning authority can take into consideration.

Planning Practice Guidance explains how a prior approval application differs from a planning application at paragraph 28. It states that:

> '*The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established* (emphasis added). *Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion on what processes they put in place. It is important that a local planning authority does not impose unnecessarily onerous requirements on developers and does not seek to replicate the planning application system*' (emphasis added).

The Planning Portal also provides Application Type Guidance. This guidance states that:

> '*Certain forms of telecommunication development, for example, mobile telephone masts, are known as 'permitted development' and subject to prior approval from the local planning authority. The prior approval procedure means that the principle of development is not an issue. The LPA can only consider the siting and appearance of the proposal*'.

Siting and Appearance:

Policies D4 and D1 of the Local Plan advise that design should be of the highest quality and must be contextual, connected, included and sustainable, maximising positive effects on the environment and improving quality of life whilst minimising or avoiding negative impacts. The proposal accords with these policies as the amount and size of the equipment has been minimised so far as practicable to minimise visual impact, whilst ensuring that the technical requirements are met. Telecommunications development is sustainable in that it improves social, economic and environmental conditions – social by its very nature, connecting people via their handheld devices; it is widely acknowledged that a reliable telecommunications network is essential for economic growth to take place; and improving digital connectivity reduces the need to travel, which in turn reduces carbon emissions.

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The height and position of the antennas on the building are so that they can be justified from a technical perspective as the antennas need to clear the immediate roof so as not to create signal clipping and reflection. The height of the proposed antennas has to be offset against their positions on the roof, whereby the closer to the centre of the roof of the building the more height that is needed to clear the immediate roof space in front of the antenna. Furthermore, the additional height is required in order to avoid ICNIRP issues, which would sterilise a large part of the rooftop at lower levels. The antennas enable the operator to provide the multiple technologies and meet their full coverage requirements to the target area within the permitted ICNIRP guidelines.

The antennas will be viewed in the context of the plant screen. In addition, the screen also prevents views from the west, from the rear of 66 Lincoln's Inn, as well as from the open space of Lincoln's Inn Fields. Unlike the decorative main façade of 58 Kingsway, featuring Portland stone facing, rustication, sculpture to pediments as well as additional carved stone foliate and sway decorations, the location of the proposals makes no contribution to the aesthetic interest of the building, and is purely functional and utilitarian in character.

As such, they have been designed and sited to minimise the visual impact on the character and appearance of the host building and conservation area and the setting of listed buildings, in accordance with Policies D4, D1 and D2 of the London Plan and Local Plan. This point is amply demonstrated by photomontages of the proposals which are enclosed as part of this application.

This is a well-considered design, which conforms specifically to NPPF in the determination of this planning application. Indeed, national guidance fully supports high quality communication infrastructure.

Telecommunications antennas are essential infrastructure to enable the mobile network to function. Similarly, plant rooms and air conditioning units are essential infrastructure but will not necessarily create places that are locally distinctive, people friendly, provide natural surveillance, nor improve the built character and quality of an area and the way it functions. Indeed, few if any essential rooftop infrastructure in the vicinity of the site enhance the character of the conservation area. It should therefore follow that although it is difficult to argue that utilitarian development does not necessarily enhance the conservation area, it is an essential requirement within it, and so long as care is taken to minimise potential visual impacts, the nature of the development should be found to be acceptable.

The installation of 3 no antenna together with 1 no equipment cabinet and ancillary development thereto on the rooftop of 58 Kingsway designed to be as similar as possible to other roof top infrastructure found in the immediate area including the adjacent plant screen will be no more at odds with the streetscene and character of the area than other existing equipment located on rooftops. This point is amply demonstrated by photomontages of the proposals which are enclosed as part of this application.

Telecommunications apparatus by its very nature must be taller than surrounding built and natural form to ensure its efficient operation. To suggest that it is inappropriate because it is

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potentially visible, (if you crane your neck in an unnatural stance), is no more relevant than suggesting that plant rooms are inappropriate because they are taller and bulkier than existing rooftops. It would be very unusual for anyone to be craning their necks upwards to the top of this building, especially considering the very busy activity at street level.

Reasonable consideration of the proposal in the context of adjacent rooftop paraphernalia and rooftops can only conclude that the presence of other rooftop equipment in the immediate area only seeks to provide a setting wherein a base station may appear more congruous from which to provide an important service to a wider area. This point is amply demonstrated by photomontages of the proposals which are enclosed as part of this application. The photomontages demonstrate that in views of the equipment from the surrounding area the proposals will not be unacceptably visible, and in other views from nearby public vantage points the equipment would not be visible at all. The maximum height of the antennas, at 31.0 metres 30.0 metres, is required for technical reasons.

Any potential adverse impacts of granting prior approval on the character and appearance of the host building, conservation area, setting of listed buildings and surrounding area would not outweigh the benefits, when assessed against the policies in the NPPF. The proposal fully complies with national guidance set out in NPPF. Maintaining and enhancing Vodafone 2G/4G communications network as well as providing new 5G services is essential for sustainable economic growth, as acknowledged by the NPPF. Mobile communications network development also plays a vital role in supporting London's successful service-based industries which increasingly depend upon infrastructure facilitating rapid transfer of information and which contributes to wider planning objectives such as reducing congestion. It also fully meets the aspirations of Camden's Digital Strategy.

Lack of Coverage – Material Consideration

In accordance with the NPPF, the proposed replacement installation is significant to enable continuous coverage of the telecommunication network, ensuring that this area of Kingsway continues to get the mobile coverage it needs for Vodafone customers as well as new 5G coverage. It will also maintain and improve coverage for the Mobile Virtual Network Operator's (MVNOs). So, the proposal will not only provide replacement but also improved and new service provision for two operators but also those who buy network space off them, which is at least 4 with Vodafone. This will provide a choice for those customers who consider the level of coverage in their area when selecting which operator they agree future contracts with.

The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place. In the justification to Policies SI 6 and E1 acknowledges that maximising access to telecommunications networks enhances the quality of life for people living and working in the area. Universal accessibility to telecommunications is vital to help overcome isolation or exclusion of urban life. Accelerating the extension of new communications modes should help to avoid new pockets of exclusion developing. The proposed radio base station

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enhancing existing service provision and providing new 5G technology will support this policy justification.

By providing the latest 4G technology and new 5G service provision the proposals will also help meet the aspiration of the London Plan, with all businesses, residents and public services all having access to a world class digital infrastructure.

New 5G coverage in this part of London will also fully comply with the London Plan by helping to meet the challenge to provide pervasive, affordable, resilient digital connectivity. The London Plan notes that if this challenge is to be met then early roll out of 5G especially in areas where mobile data use is congested is needed. The proposed upgrade will fully meet this policy aspiration. The proposals will also help London to be a smart and digitally ready city-region, where resilient fixed connectivity supported by 5G service provision is required. The proposed installation will fully comply with this aim. It will also fully comply with Policy SI 6 of the London Plan and Camden Digital Strategy as it will assist the Mayor of London and Camden with achieving their connectivity aims.

Trials have already begun across the UK to demonstrate the potential of 5G and how it can improve and drive productivity and efficiency. In June 2019, West Midlands 5G partnered with BT and University Hospitals Birmingham to trial the UK's first 5G Connected Ambulance. Real-Time communications between the paramedics and the hospital doctors enabled the effective diagnosis of the patient at an early stage of care. The trial showed how a paramedic performed a remote-controlled ultra-sound scan on a patient in an ambulance over a public 5G network. These trials show how digital connectivity and technology can reduce patient waiting times and save lives (Source: WM5G).

Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work.

Without this new replacement radio base station, the operator's customers would experience increasing numbers of dropped calls and buffering unable to access the internet on their handheld devices. They would also not be able to access the 5G network, a demand which is increasing rapidly as customers update their handheld devices to ones that are 5G compatible, and one that the Mayor of London and Camden are embracing with their ambition's to be a world leading digital city where early roll out 5G is encouraged to provide pervasive, affordable, resilient digital connectivity. If the 5G network is not available then the customers' would not be able to utilise these handheld devices for the purposes in which they were purchased. This would be contrary to the aspirations of Central Government, the Mayor of London and Camden Council which aspire to everyone having access to the superfast highway network wherever they are and being a world leader in 5G.

The proposed replacement installation will help improve the area's economic prosperity, strengthen the urban economy's by supporting local businesses to start, grow, adapt and diversify. It will support a better environment for today and tomorrow by reducing the need to travel and in turn minimise carbon emissions, a key ambition of the NPPF, London Plan and

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the Camden Local Plan. The radio base station will support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders (every missed NHS appointment costs the NHS approximately £160 source: NHS), reminders to take medicines, make appointments etc. As well as assisting hospital outpatient appointments and emergency consultations carried out remotely via video link, connected ambulances, live streaming of CCTV footage etc.

By replacing and enhancing the 2G and 4G service provision to the surrounding area and providing new 5G coverage into the operators' network, this would fully support the aspirations of the London Plan and Camden Local Plan.

The Councillor's Guide to Digital Connectivity notes that a survey conducted by the Confederation of British Industry found that 81% of firms said that they see more reliable mobile connectivity as essential. Studies have also shown that mobile broadband is associated with positive impacts nationally, such as higher GDP and increased employment.

Therefore, the Government fully supports high quality communications infrastructure, even more so with the advent of 5G. Indeed, The NPPF continues to strongly support telecommunications connectivity and states at paragraph 118 that local planning authorities should support the expansion of electronic communications networks. It acknowledges that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.

The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

To emphasis the Government's strong support for 5G and the important role that local authorities have in supporting its roll-out, Matt Warman former Minister for Digital Infrastructure wrote a letter to all Local Authority Chief Executives, CCing all Local Authority Chief Planning Officers highlighting their role in facilitating the roll-out of next-generation infrastructure and prevent misleading claims becoming a barrier to rollout. The letter highlighted the growing importance of digital connectivity:

> *'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 connectivity'.*

The letter goes on to state the Government ambition for 5G roll-out:

> *'The Government is committed to extending mobile network coverage across the UK and providing uninterrupted mobile signal on all major roads, and our ambition is for the majority of the population to have access to a 5G signal by 2027'…*

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The Government is also investing £200 million in a programme f 5G testbeds and trials to encourage investment in 5G so that communities and businesses can benefit from this new technology. The increased capacity, reliability and functionality offered by 5G is opening-up the potential for new innovative services for individuals and increased productivity for industry'.

The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliable on mobile connectivity. Following our consultation on the principle of reforms to permitted development rights to support 5g deployment and extend mobile coverage we recently published a technical consultation on the details of our proposed changes.

The National Planning Policy Framework ("The Framework") for England states that planning policies and decisions should support the expansion of electronic communications networks, including next general mobile technology, such as 5G.

An installation in this location will ensure the lack of new 5G high quality service provision is filled and will enable customers of Vodafone and their MVNOs who buy network space off these operators to maintain access to their handheld devices wherever they are for the purposes in which they were purchased. This is fully in line with the Government's aspirations that everyone has access to the superfast communications network, the NPPF, the London Plan and the Camden Local Plan.

Access to the internet in whatever medium now impacts every facet of our lives but only benefits those who can access and use it. The benefits of internet connectivity are key for both residents and businesses alike and a new radio base station in this location providing the latest 4G and 5G technologies will support the Mayor of London's aspirations to be a world-leading digital city and one which promotes the growth of the digital sector, increasing digital inclusion, so all people can access services, education and training.

In line with guidance contained within the NPPF and the London Plan, a new replacement radio base station in this location will enable fast, reliable, secure internet accessibility wherever the user is located. It would fully meet the latest operators' coverage and capacity requirements for 4G and new 5G provision. This would be wholly in line with the Government's latest aspirations to strongly support advanced, high quality and reliable communications infrastructure, essential for economic growth and social well-being. Where the NPPF notes that decisions should support the expansion of electronic communications networks. An installation outside this search area, regardless of whether there are existing sites, would not allow the operators to provide their desired level of coverage and therefore would not adequately maintain and provide new coverage and capacity.

As part of the operators 4G licence obligations, many customers will benefit significantly from a vastly improved service provision in this locality. They will be able to gain access to the very latest technologies and connectivity, including 5G, to high-speed data services, the importance of which is fully highlighted in the London Plan and Camden Local Plan.

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The Code of Practice acknowledges that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which we rely. With increasing consumer demand and the Government's aspirations for high quality communications infrastructure it is ever more important to improve connectivity and capacity.

The Code of Practice acknowledges that there will be times when there is a need for a new radio base station, where sites have been lost, where areas have limited or no coverage and where coverage and capacity need to be enhanced. This application is one such example where there is a need to maintain legacy services as well as provide new 4G provision and provide new 5G services within this area.

In the Code of Practice it acknowledges *'the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. With the increasing consumer demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity. This is due to the ever increasing demand for data hungry applications to be available to a range of connected devices, such as smartphones and tablet computers. However, The Code notes that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which they rely'*. Therefore, there is a significant need to locate the equipment in this area as demonstrated in Image 6 and 7 above.

The operator not only has a license requirement to provide a certain level of 4G coverage to the population, but they are also obliged to meet the growing consumer demand for 5G coverage, especially as more people are purchasing 5G enabled devices, in line with their license obligations and the operators competitive market driven "requirement" to provide a high quality service. Customers expect to be able to access their portable hand held devices wherever they are, whether that be indoors or outside. There is currently no 5G service provision that is provided by Vodafone in this cell area. The least impact on the surrounding environment in order to fill this gap is by installing a replacement radio base station at the application site.

It is therefore imperative that the operator continues to invest in ensuring that the latest technologies are available on its network, so that customers are able to continue to use their handheld devices wherever they are, for whatever reason, for the purposes in which they were purchased.

Economic and Social Benefits

The Town and Country Planning Act requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. Paragraph 196 of the Framework states that where a development would 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. With reference to the levels of harm in the NPPF, the proposals would result in 'less than substantial' to the significance of any of the identified heritage assets through a change in their settings.

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When telecommunications proposals are considered, it is necessary to carry out the balancing exercise weighing the need for development and the magnitude of public benefits of the proposed base station against the perceived concerns about the development's visual impact and availability of alternative locations and the possibility to design the scheme differently without impacting the operational needs of the operators.

The NPPF strongly supports sustainable development as does the London Plan and Camden Local Plan. Mobile communication plays a significant role in sustainable development, being able to access the internet via a mobile device allows people to access a wide range of central and local government services buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, participate in social media, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. Residents and businesses will enjoy better accessibility, assisting home-base working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work development. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with NPPF to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Enhancing the 4G coverage and capacity in this area and providing new 5G services will fully meet this national policy objective. Continuing to transform the digital connectivity of London to drive economic growth and innovation, working to meet national targets of full roll-out of 5G technology for most people by 2027 will comply with the ambitions of the of the London Plan.

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

The enclosed Cornerstone Local Authority Engagement Brochure September 2020, emphasises further the benefits of high quality mobile connectivity including: promoting economic growth by attracting investment from business, which creates jobs and regional prosperity in line with national and local economic strategies; helps local businesses to offer a broader range of services, boosting the local economy; helps local Councils to offer online services such as school admissions and local information for residents supports local companies by facilitating working from home, offers social benefits such as being able to connect with vulnerable family and friends (a life line during COVID 19 lockdown) or contact the emergency services 24/7, and helps local councils to offer online services such as paying council tax bills which provides a more efficient service to name but a few benefits.

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Good connectivity allows people to access a wide range of essential services and a further explanation on some of these key benefits is provided below:

Economic benefits

- Creating more productive and cost efficiencies for businesses
- Businesses offering online services can extend their products to a broader audience
- Local areas and businesses can benefit from tourists and visitors as hotels, attractions, and restaurants can be booked online from anywhere in the world
- Business owners and services like doctors can provide a faster and more cost-effective service by offering both online appointments and ordering
- Digital connectivity facilitates economic growth, something which the Government is keen to progress and promote
- 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 facilitate learning on the job procedures, thanks to technologies such as Augmented Reality (AR) goggles, which, for example, can give the likes of engineers real-time instructions on how to fix a machine on a production line.

Social benefit

- Mobile communications can help people to stay in touch wherever and whenever, which can help improve social wellbeing
- Convenient access to online commerce or businesses
- Contacting emergency services is easier, especially in remote areas
- Giving the ability to manage our personal finances and information 24/7
- Using a mobile wherever you go can provide better personal security
- Having access to social networking sites and applications can keep people entertained with their lifestyles and interests
- Access to real-time transport information or timetables
- Smart meter reads for utilities such as gas or electric
- Contacting local authorities
- Promotion of smarter and productive ways of working. For example, working from home can help minimise commuting which can provide better work and home life balance

Sustainability and Environmental benefits

- Facilitating remote access to services, education, and commerce, reducing the need to travel and in turn minimising carbon emissions.
- Better monitoring and control of energy consumption through climate change technology, smart metering and smart energy grids.
- 5G infrastructure requires fewer heat generating electronic components.
- 5G enabling of the Internet of Things (IOT) sensor deployment can manage and alert us to pollution risks, health hazards and flood risk.

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- Provision of smart technologies within the agricultural sector will facilitate more efficient and less wasteful practices helping to limit negative impacts.
- 5G networks allow monitoring of traffic flow resulting in less congestion and better air quality. They also make driverless cars possible; a means of transport that offers better fuel efficiency.
- Smart cities and buildings can rely upon 5G networks to enable buildings and infrastructure to use automated energy saving through better and more efficient lighting, heating, cooling and other operations.

Health benefits

- Support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.
- Patients across the country are now becoming accustomed to using remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.
- 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.

Education benefits

- Facilitates access to educational establishment databases or booking systems for securing places for the likes of school dinners, field trips, extra-curricular activities, student/teacher reviews, etc.
- Provides access to school/college/university apps for setting and submitting homework/coursework, ensuring news and notifications are delivered efficiently, and for parent/student/teacher interactions.

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.

There is a demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all 3, make it difficult. Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.

Paragraph 38 of the NPPF 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,*

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including…permission in principle, *and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'*.

Maintaining legacy services and providing improved 4G coverage and capacity and new 5G service provision in this area will fully meet paragraph 38 of the NPPF, the Local Plan and Mayor of London aspirations. These strategies and the Framework also support strengthening digital and data infrastructure (including 5G), and using data to help address challenges.

The social and economic benefits are a significant material consideration which should be weighed against the minor amendments of the existing radio base station in this location. HM Treasury outlined such benefits in its report '*Fixing the Foundations: Creating a More Prosperous Nation*' – July 2015. Paragraph 7.1 of the plan stated that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

Paragraph 7.2 goes on to highlight strong support for high quality communications infrastructure. It states

'by reducing 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 March, of near universal 4G and ultrafast broadband coverage.'

Indeed, MPs have noted in parliament that the UKs Superfast Broadband connectivity was 'relatively poor' and businesses were losing out from patchy coverage.

The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. That is why the Government is committed to extending mobile geographical coverage further across the UK, with continuous mobile connectivity provided to all major roads and to being a world leader in 5G. This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage. As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver property at the local level and enable all places to share in the proceeds of growth.

The Government is determined to ensure the UK receives the coverage and connectivity it needs. To this end, the Government wants to be a world leader in 5G, the next generation

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of wireless connectivity, and for communities to benefit from the investments in the new technology.

The case for 5G is compelling as it will bring faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, 5G has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time, creating the so-called "Internet of Things". This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business and farmers, all through the real-time management of data.

The Local Government Association (LGA) has produced a Councillor's Guide to Digital Connectivity and sets out some of the benefits of 5G technology:

- Faster mobile broadband and a more consistent experience in congested areas with a very high number of devices.
- Industrial applications, enabling businesses to improve their productivity, for example through predictive maintenance and real-time analytics.
- Internet of Things (IoT) services, many of which will help council's and businesses deliver services more efficiently including:
    - Transport and logistics: connected parcels and fleet tracking.
    - Health and social care.
    - Environmental monitoring: sensors monitoring air quality and water pollution in real-time.
    - Smart agriculture and smart animal farming, smart retailing.
    - Connected and autonomous cars: allowing cars to communicate with each other, other road users and even the road infrastructure.

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016 (https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx). It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

> *'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global market place. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases'*

The Assessment goes on to note that '*Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy*'. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights

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the importance of replacing, maintaining and enhancing high quality 2G and 4G coverage and capacity in this part of Camden as well as providing new 5G in this area, where the social and economic benefits will outweigh the environmental considerations in line with Policy SI6 of the London Plan.

The Government's continued strong support for connectivity is further evidenced by the DCMS who launched their UK wide Digital Connectivity Portal on 20 December 2018. The Digital connectivity portal provides guidance for local authorities and network providers on improving connectivity in local areas. The Government wants everyone in the UK to benefit from world-class connectivity no matter where they live, work or travel. The Future Telecommunications Infrastructure Review outlines a package of measures to create the right market and policy conditions to deliver world-class connectivity for citizens and businesses. As a result, the pressure to provide a replacement radio base station in this part of Kingsway to provide replacement 2G and new 4G and 5G is significant.

On the 23 September 2020, the former Digital Infrastructure Minister Matt Warman MP spoke about the ongoing work by the Government and telecoms industry to boost the UK's world class digital connectivity in his keynote speech at Connected Britain 2020[4]:

> *"…I'd like to take this opportunity to thank everyone in the industry for their tireless efforts at keeping us all connected through an unprecedented period of disruption.*
>
> *…COVID has altered the way we live, work and most importantly, stay connected with our family and friends. The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown – and is now more important than ever as we head into recovery. Many of these changes – such as increased working from home – will stay with us for the foreseeable future.*
>
> *People have referred to the internet as "the fourth utility" – and it's true. For countless people across the country, having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity.*
>
> *That's why I'm committed to working with you to ensure the entire nation has access to world-class, next generation gigabit connectivity that is secure and resilient enough to deal with all sorts of future challenges.*
>
> *This Government is ambitious for the UK's digital infrastructure.*
>
> *And because we know that more citizens are increasingly living their lives online, we will be one of the earliest adopters of 5G coverage, with the majority of the population able to access 5G by 2027.*

[4] https://www.gov.uk/government/speeches/matt-warmans-keynote-speech-at-connected-britain-2020?utm_source=01ad07cc-6884-4d9b-a0ca-8c212f0a4289&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate

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...We know how important local authorities are to the delivery of digital infrastructure, which is why I have written to them, together with the Local Government Minister, to outline how they can work more effectively with the industry…

….Turning to 5G, while the commercial rollout of 5G continues at pace, we're pushing ahead with plans to make sure all sorts of industries benefit from this game-changing technology.

….since the start of the 5G Testbeds and trials programme, we've now funded 24 5G testbeds across the UK. Between them, those testbeds have trialled almost 70 different 5G technologies, products and applications. And more importantly than ever, we are investing in a range of sectors to foster, build and grow 5G cross wider industry...

…The world is in the middle of a digital revolution. COVID has accelerated this process, digitising almost every part of our everyday lives and making the infrastructure that connects us more important than ever. That's why it is at the top of the government's agenda…"

This Keynote Speech by Matt Warman MP highlights the importance that Government places on 5G and advanced, reliable, high quality 5G technology. To prevent this technology from being brought into the area would be contrary to the Government's key aims.

On the 1 October 2020, as part of the Speed up Britain Campaign, The Centre of Policy Studies Report published '*Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution*'[5]. The report identifies what the 5G opportunities are and what the Government needs to do so we can all benefit from this vital new technology. It states that delays to the rollout of 5G could cost the country tens of billions of pounds in lost economic output. The former Government advisers Alex Jackman and Nick King argue that Government's 'levelling up' agenda and the UK's recovery from the COVID-19 pandemic is at risk without a faster 5G rollout – to the tune of £41 billion.

The report highlights that if delays continue at their current rate, by 2027, over 11 million households and businesses could be missing out on vital digital connectivity. Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities.

The report states that '*the UK must have a functioning network to now support the recovery from the pandemic, empowering businesses and communities with wider coverage, and preparing the ground for the services that 5G can provide*'.

Using analysis by the independent consultancy Policy Points, the report estimates that if 5G coverage reaches a quarter more of the population than the Government's current target of 51%, it will produce GDP gains of £41.7 billion by 2027. It highlights that the difference between the UK being a leader and a laggard in 5G adoption could be as much as £173

[5] https://www.cps.org.uk/research/upwardly-mobile

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billion in incremental GDP over the coming decade, as estimated by the Future Communications Challenge Group.

The manufacturing, construction and agricultural sectors have been hit particularly hard by the pandemic, and these would benefit significantly from improved connectivity. However, onerous planning rules and loopholes in existing legislation are slowing down the infrastructure upgrades needed to make the most of this mobile revolution in these much-needed industries.

Digital networks and services have underpinned our resilience to the COVID-19 pandemic and they will drive our recovery. By expanding them, we deliver not only immediate benefits but also the essential foundation stone for future prosperity.

The report highlights that while 5G promises to create economic benefits through increased capacity, reliability and speed – vastly improving business productivity and removing barriers imposed by poor digital connectivity – the system is plagued by red tape.

The report acknowledges that the gains are not just at national level. A more extensive digital infrastructure helps local areas to attract and retain businesses and talent, thereby playing a vital role in reducing regional inequalities. Providing a supportive environment for digital infrastructure is one of the few things the Government can do that costs little, boosts growth and helps level up the UK….the key is speed. **The faster a network is built, the bigger the regional gains** (emphasis added). The telecommunications industry faces challenges on this front. The COVID-19 pandemic has increased demand on networks but delayed the availability of new spectrum to provide additional capacity.

The report notes that the reliability and reach of 4G is more important than ever. It is needed both to quench immediate demand, and also to facilitate future 5G rollout, as the underlying passive infrastructure will initially support both technologies. Every failure to provide better coverage not only presents an immediate opportunity loss for local business and consumers but also has a bigger downstream economic impact. It acknowledges that productivity gains to business, equality gains for regions and economic gains for the country are only as achievable as the networks they can access.

The report recommended that the Government should reform the strategic planning framework to compel local authorities to ensure that the needs of future mobile connectivity are adequately addressed in Local Plans and that new developments are assessed on how they might impact, or could support, local connectivity.

The Government's ambition for the majority of the UK population to have access to 5G signal by 2027 was repeated in the letter to all the Councils' Chief Execs and Chief Planning Officers from the Minister for Digital Infrastructure Matt Warman. This letter also acknowledged that the demand for 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 to stay connected and for businesses to grow.

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The proposed installation in this location will allow the operator to provide new and replacement high quality 2G and 4G coverage and capacity and new 5G service provision supporting the Government's aim of '*focusing on ensuring that everyone is connected to the information superhighway*' and 'for the majority of the population to have access to a 5G signal by 2027'. This fully meets the aspirations of the NPPF, and the London Plan.

An installation in this location providing 5G will ensure that the expansion of the electronic communications network is facilitated and that high quality communications infrastructure is provided to the immediate area.

Practical Applications of 5G Connectivity as Example of Material Socio-Economic Benefit:-

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.

Summary

It has been shown that the provision of advanced high quality and reliable communications infrastructure is essential for sustainable economic growth and plays a vital role in enhancing the provision of local community facilities and services in accordance with the Local Plan Vision.

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Site selection was progressed in accordance with the applicant's licence obligations, advice in the NPPF and the Code of Practice and represents the least environmentally intrusive, technically suitable, available option. It has been demonstrated that there are no more suitable sites that could provide this essential service to this cell area.

The proposed scheme will not represent a prominent and alien feature out of character with the locality, by reason of its design, scale and siting. This point is amply demonstrated by photomontages of the proposals which are enclosed as part of this application.

It has been demonstrated that the proposed height is the lowest possible that will allow Vodafone to maintain services and obtain their required 5G services to the surrounding area. At lower heights, the antennas would be blocked by the plant screen.

There are no more sequentially preferable sites that would provide the replacement and new 4G and 5G coverage to be provided that would cause less visual harm than this proposal.

The less than substantial harm arising from the replacement proposals is outweighed by the public benefits. The social and economic benefits of providing reliable and high quality mobile broadband connections including 5G support growth in productivity, efficiency and labour force participation across the whole economy is a strong material consideration in the determination of this application. It is fully supported by the NPPF, the London Plan and the Camden Local Plan. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area as set out above in the preceding paragraphs.

We confirm that submitted drawings have been checked for accuracy.

Contact Details

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

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