SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Crest View	Site Address:	Crest View 47 Dartmouth Park Hill London NW5 1JB
National Grid Reference:	528942, 186215		
Site Ref Number:	55599	Site Type:[1]	Macro

2. Pre-Application Check List

Site Selection (for New Sites only)
(Would not generally apply to upgrades/alterations to existing sites)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	**No**
If no explain why: No register available.		
Were industry site databases checked for suitable sites by the operator:	**Yes**	No
If no explain why: Yes		

Site specific pre-application consultation with local planning authority

Was there pre-application contact:	**Yes**	No
Date of pre-application contact:	14 November 2024	
Name of contact:	Planning	
Summary of outcome/Main issues raised: Pre-application correspondence was sent to Camden Council by email on 7 November 2024. A response was received on 14 November 2024 confirming a fee of £1217.50 was required for pre-application advice. Due to the level of fees compared to the formal application fee, and as this is a revised submission, it was decided to proceed to a formal application.		

[1] Macro or Micro

Community Consultation

Rating of Site under Traffic Light Mode If Required:	**Red**	Amber	Green

Outline Consultation carried out:
Pre-application consultation letters were sent by email on 7 November 2024 to the following Stakeholders:

- Highgate Ward Councillors – Councillors Russell, Aref-Adib and Wright;
- Member of Parliament for Hampstead and Highgate – Tulip Siddiq MP.

Letters were also sent to the residents by first class post on 7 November 2024 to the following properties:

- Nos. 1 – 19, Crestview, 47 Dartmouth Park Hill
- Nos. 49, 53, 57-63 Dartmouth Park Hill
- Flats 1-3, Studio Flat, Second Floor Flat – 51 Dartmouth Park Hill
- 1-14 Mary Webster House, 55 Dartmouth Park Hill
- 1-10 Maiden Place, Dartmouth Park Hill
- 1-6 Lincoln House, Dartmouth Park Hill
- 1-6 Suffolk House, Dartmouth Park Hill
- 47, 52 Laurier Road
- 2-10 Dartmouth Park Avenue
- 68-70, 79, 81, 85 Dartmouth Park Road
- Flats 1-3, 83 Dartmouth Park Road

A total of 83 properties were notified.

Summary of outcome/Main issues raised:

Comments were received from two Ward Councillors. Cllr Wright responded on 14 November 2024 with the following comments: "*Please be aware that I strongly object to this proposal as I have done on the previous occasions that such an application was submitted. I will respond in detail when the full planning application is submitted."* Councillor Russell replied on 18 November 2024 with the following comment: "*Thanks for sharing this proposal with me. I too strongly object to it."*

A total of 23 responses were received in response to letters sent to residents of the building and neighbouring properties. Apart from one, none of the objectors raise specific concerns, saying that they will set out their objections at application stage. Responses have been sent to all who responded.

School/College

Location of site in relation to school/college (include name of school/college):
The site is close to the following establishments:

- Acland Burghley School - Burghley Road
- La Sainte Union Catholic Secondary School – Highgate Road
- Wildwood Nature School – York Rise

Outline of consultation carried out with school/college *(include evidence of consultation):*
Pre-application correspondence was sent to the schools by email on 7 November 2024.

Summary of outcome/Main issues raised:
To date no responses has been received.

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

Will the structure be within 3km of an aerodrome or airfield?	**Yes**	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	**Yes**	No
Details of response: The site is located within the safeguarding zones of both London City Airport and Heathrow Airport. Safeguarding Area Notices were sent to the airports on 7 November 2024. A response was received from Heathrow Airport on 8 November 2024, confirming they have no objections. London City Airport responded on 11 November 2024 confirming the proposal does not conflict with London City Airport's safeguarding criteria. A copy of the correspondence is included with the application documents.		

Developer's Notice

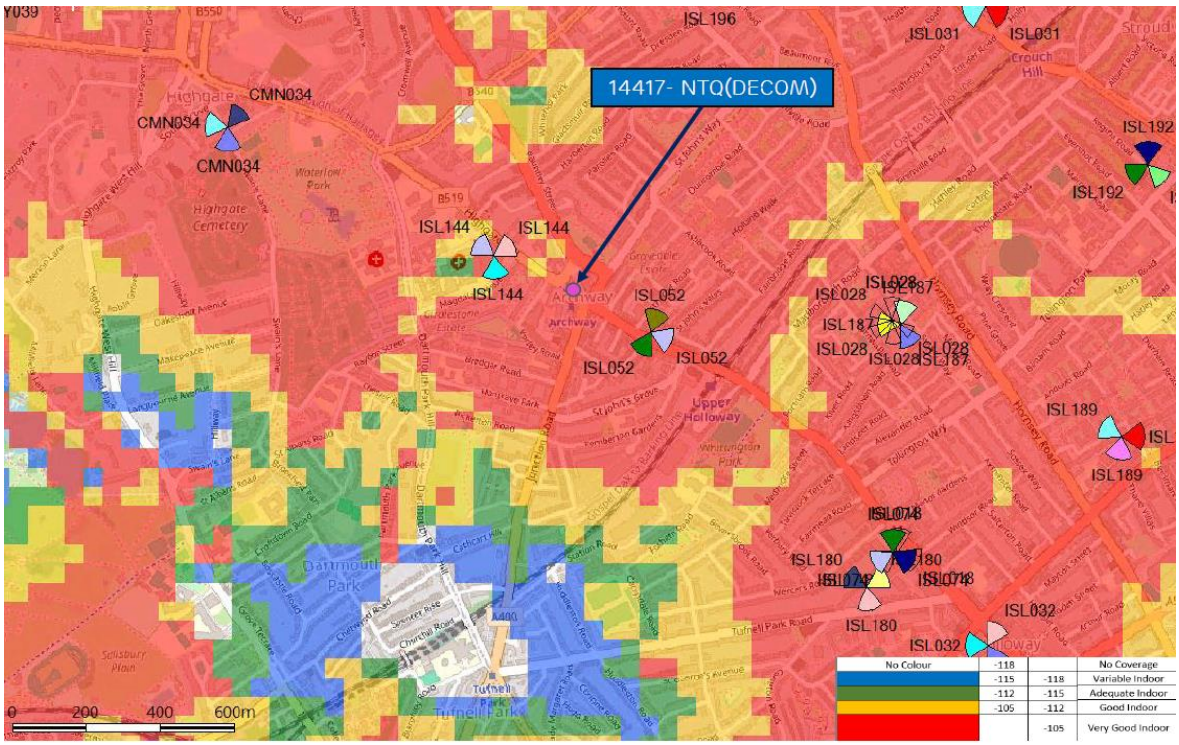
Copy of Developer's Notice enclosed?	**Yes**	No
Date served:	30 December 2024	

3. Proposed Development

The proposed site:
EE and H3G previously had equipment located on Hill House on Highgate Hill, Archway. The operators had to remove their equipment from the building due to its redevelopment. Since the equipment was removed, a new site has been sought to provide replacement coverage for both EE and H3G. When the Hill House site was lost, there was an overlap in coverage in the area close to Hill House from existing sites and there was a reduced level of coverage to the south-west. Therefore, it was decided to pursue a replacement site where it would replace some lost coverage but also improve coverage and capacity to the south-west, hence the Crest View proposal rather than a site closer to Hill House. The application site is a six-storey building in residential use, located at the junction of Dartmouth Park Hill and Laurier Road. The building is located on the eastern boundary of the Dartmouth Park Conservation Area – Dartmouth Park Hill marks the eastern boundary of the designated area. The proposal involves the installation of 3 no. antenna apertures, 1 no. transmission dish and ancillary equipment cabinets on the roof of the building. The development would provide replacement and improved connectivity and network enhancement (including new 5G coverage) to the surrounding area for both EE and H3G. It is noted the building has previously housed telecommunications apparatus on the building. This is a revised submission. Previous applications (references 2021/0598/P and 2022/4190/P) to install equipment onto the building were refused in 2021 and 2023. This submission further reduces the proposed amount of equipment, both in terms of the number of antennas and equipment cabinets, to reduce the visual impact of the development. The precise changes to the scheme will be set out in the 'Reasons for choice of design' section below. Photomontages have also been included to illustrate how the equipment would be viewed if installed. The photograph below shows the building taken from Dartmouth Park Hill:

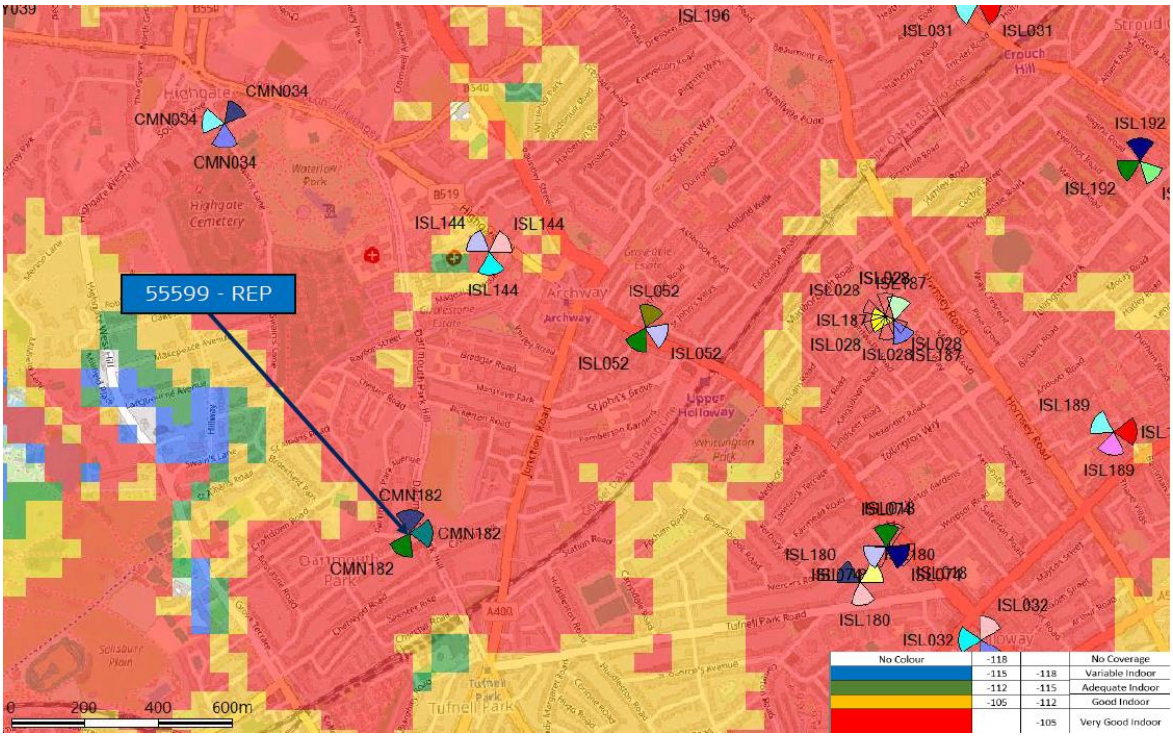
Enclose map showing the cell centre and adjoining cells if appropriate:

Predictive coverage plots are included with the application to confirm the need for the site. Plots are included within the application to illustrate 4G indoor and outdoor coverage for both EE and H3G. Extracts of the plots are included in this document – H3G 4G indoor plots are included. For 4G coverage red and yellow levels of coverage are required to provide a good level of service. The first extract below confirms the coverage that is currently provided in the area. The previous site (Hill House) is annotated as '14417 – NTQ(DECOM)':



Current H3G 4G Indoor Coverage levels

The plot shows a current good level of coverage around the Hill house site. This is because there are other installations in the area (to the north-west and south-east). The plot also confirms an existing deficiency in coverage to the south-west of the site, in the area of the current application. The next plot includes coverage from the application site. It can be seen that significantly enhanced coverage would be provided in the area to the south-west:



Coverage including the application site at Crest View

The overall position is that greatly enhanced coverage would be provided from the application site. Capacity would also be improved, which is not illustrated by the plots, and new 5G coverage would also be provided.

Type of Structure *(e.g. tower, mast, etc):*	*Rooftop*
Description: Revised submission - the installation of 3 no. antenna apertures, 1 no.300mm transmission dish and 5 no. equipment cabinets on the roof of the building and development ancillary thereto.	
Overall Height:	25.49 metres to top of antennas
Height of existing building *(where applicable):*	22.05 metres (plant room level)
Equipment Housings:	
Link AC Cabinet:	1.2m (width) x 0.6m (depth) x 1.6m (height)
EE BBU Cabinet:	1.5m x 0.75m x 2.19m
H3G BBU Cabinet:	0.65m x 0.7m x 1.1m
2 x Equipment Cabinets:	0.77m x 0.77m x 2.1m
Materials *(as applicable):*	
Tower/mast etc. – type of material and external colour:	N/A
Equipment housings – type of material and external colour:	Steel with a light grey finish (RAL7035).

Reasons for choice of design:

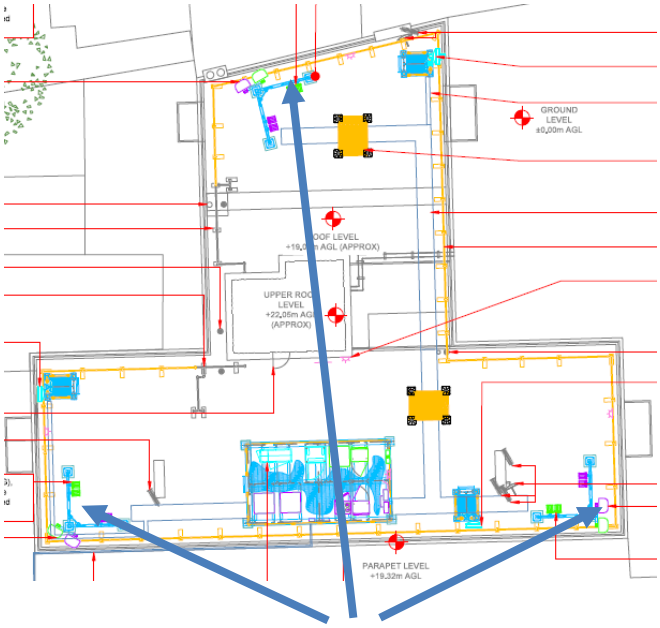
In designing the proposed installation, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter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

There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the links into the network either by fibre cabling or by dish antennas, power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

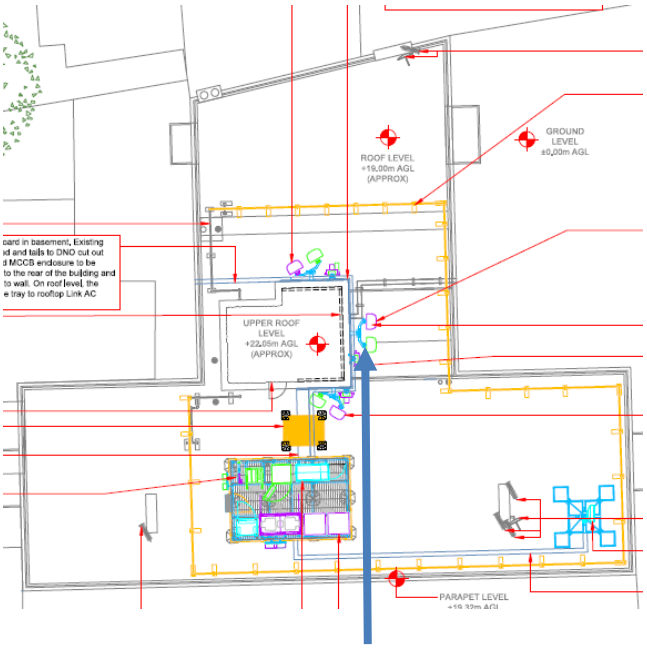
As previously noted, this is a revised proposal following the refusal of two previous applications. Improved technology, allowing EE and H3G to share antennas to provide 5G coverage has allowed a revised design to further reduce the impact on the building compared to the previous proposals. The first design proposed antennas on the northern, western and eastern edges of the building. The second application relocated the antennas to the central plant room and moved the equipment cabinets away from the southern edge of the building. In addition to this, the ground level meter cabinet was removed from the scheme.

The current proposal reduces the impact of the development. The last application proposed six antennas around the plant toom of the building. This new proposal utilises the same antenna locations around the plant room. The previous application proposed two antennas in each location, and this has reduced the number to one per location, resulting in the overall number of antennas reducing from 6 to 3. This allows for a less cluttered appearance, compared to the previous proposal. In addition to this, the number of equipment cabinets has been reduced from 7 with the previous application to 5 with this new proposal, further reducing the amount of equipment on the building.

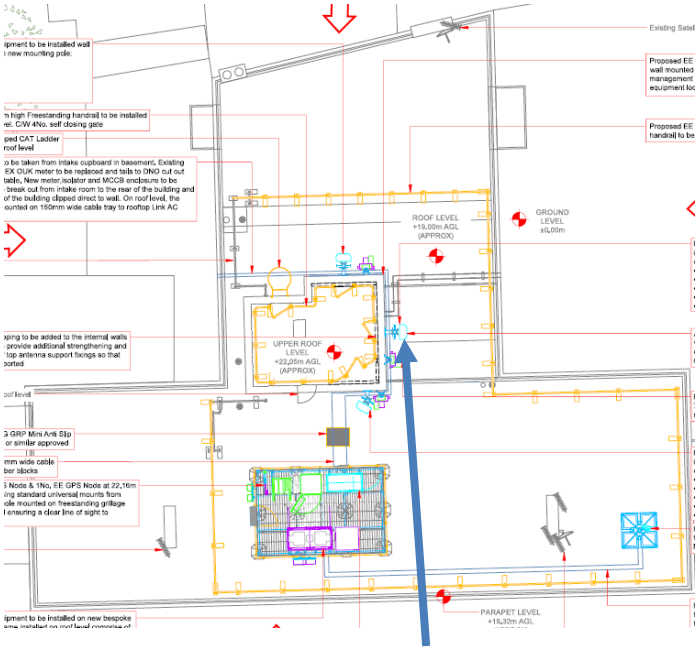
The changes are illustrated on the drawing extracts below. The site plan drawings below include the proposed site plan from the first two applications and the current proposed site plan from this application (extract of drawing 215G):



First application antennas around building



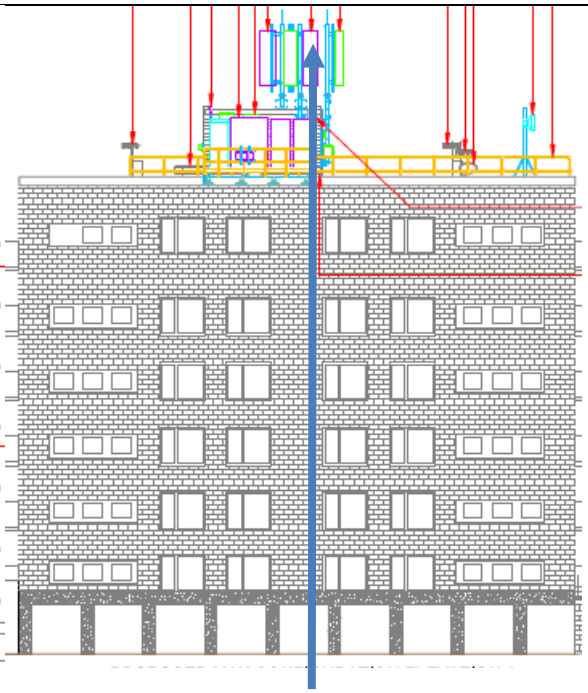
Second application - central antenna location



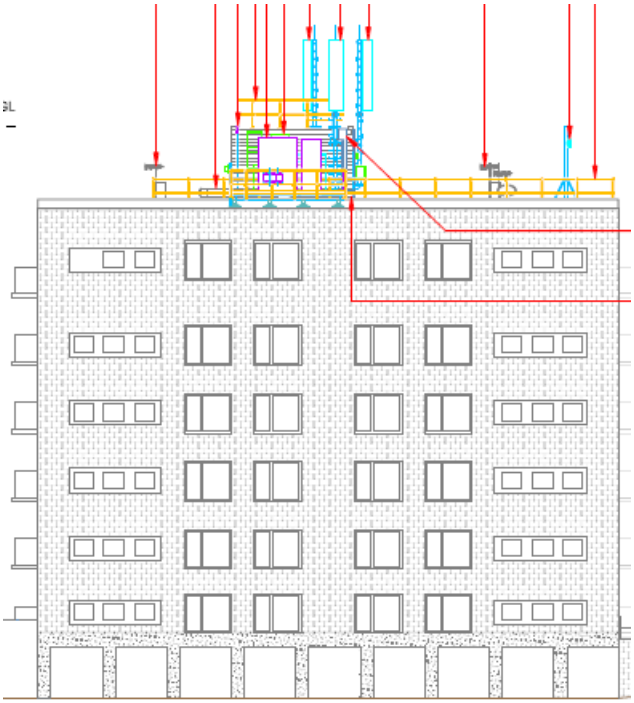
Current application proposal – reduction in number of antennas and cabinets

Elevation drawings below are again from the previously refused schemes and the current application proposal (extract of drawing 265A Issue G):

First application antennas around building



Second application - central antenna location



Current application proposal – reduction in number of antennas and cabinets

It was initially thought the plant room did not have the structural capability to support the antennas, hence the location of the antennas around the building for the first application. The second application relocated the antennas onto poles supported by the plant room. This current application further reduces the impact of the proposed development by reducing the number of antennas from 6 to 3.

The development would provide replacement and enhanced 2G and 4G coverage for EE and 4G for H3G. The site would also provide 5G coverage for both EE and H3G. The site would provide enhanced coverage and capacity for existing technologies, and new 5G coverage to the area.

By utilising a rooftop site, for two Operators and for multiple technologies, the proposed development achieves replacement and enhanced coverage to the area with only a minimal visual impact. It is considered, overall, that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact.

Technical Information

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, EE Ltd & H3G UK Ltd operates its networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of EE and H3G's networks, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.	**Yes**	No

4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

Reason(s) why site required e.g. coverage, upgrade, capacity

The development is required to provide replacement coverage, along with improved connectivity and network enhancement for EE and H3G in the area. As noted above, the site would provide 4G and 5G coverage for both EE and H3G.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other and by cables or wireless technology to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. There are several variables that determine the size and shape of each cell.

Base stations are low powered radio transmitters. They each have a limited range, meaning that they need to be located close to the area requiring coverage. If one moves too far away from that area, then it is likely that some areas will remain without the services they previously enjoyed.

When an existing site is lost from the network it leaves a very specific "gap" in coverage within the established network pattern which needs to be filled. The consequence of not doing so is that users of the network find that the services they previously had access to are either limited or removed.

The Application Site is specifically located to fill the coverage gap so as to link with surrounding cells to ensure a continued blanket level of good quality coverage is available, this will allow a smooth handover between cell sites ensuring that users do not experience a loss of connectivity. Many drivers and passengers using the road network and railway network rely on mobile devices for navigation purposes, to make and receive voice calls as well as for audio and entertainment purposes. By ensuring access to a continuous, high-quality service, users can enjoy the benefits of connectivity whilst on the move.

Improvements in technology have enabled cell sites to carry more traffic and increase data speeds, leading to a better user experience. If the number of users exceeds the capacity that a site can accommodate, users experience slow connectivity with potential for 'dropped calls'. The continuing rise in data usage, the demand for faster speeds and newer technology (including 5G) coupled with increased mobile phone demand, means that the existing Network is unable to meet the increased need. This results in users experiencing poor quality service. The Application Site also will provide the very latest services to this area and increase the Network's capacity, which will meet the ever-increasing user demand.

High quality communications infrastructure is essential for sustainable economic growth and that high-speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services and this replacement site will also bring new 5G technology to the surrounding businesses.

The UK Government recognises the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

The Digital Infrastructure Minister, Matt Warman, in his keynote Speech at the Connected Britain Conference 2020 referred to the internet as the *"fourth utility"* and went on to state that *"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". He went onto acknowledge the importance of connectivity during the Covid pandemic, *"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"* and also recognised that "*changes such as increased working from home will stay with us for the foreseeable future".*

More recently the Government has referred to the importance of the digital infrastructure as being integral within its paper on "Levelling Up the United Kingdom" (2 February 2022) in which it was recognised that "*improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working.*

More broadly, high quality digital infrastructure can deepen local labour markets through remote working, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas".

The importance of the role connectivity plays in all aspects of life is also recognised within the new Code of Practice for Wireless Network Development in England issued by the Government Department of Digital, Culture, Media and Sport (March 2022):

"*Digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK.*

"As the demand for mobile data in the United Kingdom is increasingly rapidly, it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel".

The Planning Inspectorate too has in recent years continually recognised the importance of this issue and cited it in appeal decisions that have overturned the decisions of local authorities across the UK where there has been a failure to apply due weight to the value of connectivity to social and economic prosperity in the assessment of applications made for telecommunications development, even in protected or sensitive areas. As an example, in October 2018 the decision of Winchester City Council to refuse prior approval for the installation of a 17.5m high monopole and associated equipment housing, required to replace an established site being lost from Vodafone's network, was overturned by the Planning Inspectorate (CTIL and Vodafone Vs Winchester City Council, appeal reference APP/L1765/W/18/31975). Within the decision notice, the Inspector stated that:

"*I attach significant weight to the public benefit arising from the continuation of local service provision…..Having regard to all relevant considerations.. my findings are that the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area*".

A similar circumstance exists in this case, with the Application Site required to provide replacement coverage on two networks, a matter certainly in the public interest.

In March 2020, the decision of Birmingham City Council to refuse planning permission for the replacement of a 12.5-metre-high monopole with a 20-metre-high monopole was overturned by the Planning Inspectorate (EE Ltd and H3G UK Ltd Vs Birmingham City Council, appeal reference APP/P4605/W/19/3241791). Within the decision notice, the Inspector stated that:

"The proposed upgrade would contribute to delivering a modern, advanced, high quality and reliable communications infrastructure… It follows that the upgraded mast would support economic growth and the local community by enabling fast and reliable communication to take place, for example by helping people gain employment, access services, support their health and well-being, whilst also assisting new technologies.

In this case, the proposed development would result in harm to the visual amenity of the area, with particular regard to the proposal's scale and siting… However, I conclude that this harm would, on balance, be outweighed by the economic and social benefits that would stem from the proposed upgrade which would not be realised whilst reducing the height of the mast".

It is considered that when the balancing method advocated in the NPPF is applied to the proposal, where the need and significant public benefit of ensuring replacement network coverage is provided, is balanced against the appearance and level of associated visual impact of the proposed site, that the Application Proposal is positively in favour and is considered wholly appropriate.

As recognised by the London Assembly's Regeneration Committee within its "*Digital Connectivity in London*" report, published June 2017, digital connectivity is now widely regarded as the "'*fourth utility', an everyday necessity alongside water, gas and electricity*" and also noted that "*mobile broadband is, and will continue to be, an essential complement of fixed broadband*". It is no longer a luxury, but a service essential to modern life.

The loss of services on two major networks at a time when reliance on connectivity services is a fundamental part of every day is simply unacceptable.

The installation of this proposal will provide replacement 4G technology, along with new 5G coverage to the area.

2G was the second generation of cell phone transmission, it introduced data services for mobile, starting with SMS text messages.

3G was an extension to this and enabled the use of data. The main technological difference that distinguishes it from 2G technology is the use of packet switching rather than circuit switching for data transmission. Increased data rate to a minimum of 2 Mbit/s for stationary or walking users, and 384 Kbit/s in a moving vehicle.

Similarly, 4G was another extension and enabled an increased speed in connection. It Supports a minimum data rate of 1 Gbit/s for stationary and 100 Mbit/s for mobile operation. In simple terms the benefit to users is that 4G that supports mixed data, voice, video and messaging traffic at significantly faster speeds than 3G. This results in ultra-fast internet browsing, video streaming, gaming, e-mail and downloads. In simple terms 3G allows for data transmission as well as text services as mobile phones, computers and other portable electronic devices access the internet wirelessly.

EE will become the Emergency Services Network (ESN) Provider and their 4G network will be utilised for this purpose. It is essential to replace services for not only current users but for the emergency services also. A briefing note on the ESN is included with the application documents.

5G is the latest technology which is still being rolled out nationwide, for this reason, there is not yet a blanket of 5G coverage and this Site works towards achieving reliable 5G services for users at home and on the go. As 5G becomes more widespread, a comprehensive covering of 5G reception can be expected.

It is worth noting that the plots show only the geographical reach of coverage. Capacity, the volume of call and data traffic that can be handled by any one base station at a given time, does not display on the plots. However, this is a critical network consideration and especially important in high traffic areas with large populations where call volume is higher and cell areas often smaller due to the density of development. Indoor coverage provision is imperative across the UK, arguably more so within commercial and residential areas where connectivity plays a particularly vital role in commerce. Without the installation subject to this Application, the vital indoor levels, which allow customers to access services from within buildings, would simply not be achieved. It is particularly vital in this case given the densely residential nature of the local area.

In 2019, Barclays released a report titled "5G: A transformative technology" which included projections of economic growth based on the uptake of 5G by businesses. The report included three scenarios, a pessimistic view, a central view and an optimistic view which considered the outcome of the development of a national 5G network at a slower rate, orderly pace, or faster uptake, respectively. The annual business revenue by 2025 was projected to increase by £8.3bn in the slowest scenario and by £15.7bn in the fastest scenario. This would add 101,300 extra jobs by 2030 in the slower paced uptake, and 171,900 additional jobs in the faster uptake. This is just one example of the huge economic advantage that a reliable, widespread 5G network could achieve. The Application Site forms an integral part of the Network and works towards achieving economic growth for the UK economy.

It is our view that this proposal is exactly the type which the government is endorsing. The Application Site would work with the surrounding infrastructure to ensure a good stable connection even as users transfer from one cell area to the next. The Application Site will enable EE and Three to provide replacement coverage to this part of Andover as well as new 5G technology, benefitting both voice and data services. The Application Site will also increase capacity as well as improving the resilience of the Network in this area. The Applicant has designed the site so as to have minimal aesthetic impact on the surrounding area and yet meet the coverage need.

In 2022, the UK Government published the Code of Practice for Wireless Network Development in England. This sets out the legal and policy framework as well as the principles that Mobile Network Operators should follow. Within this document, the Government recognises that *"Digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK."*

The Government also notes the importance of widespread connectivity, enabling users to access services at home and on the go: *"As the demand for mobile data in the United Kingdom is increasing rapidly, **it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel**."*

At a local level, this installation allows for an increase in home working, by providing the opportunity to create a "virtual office", reducing the need to travel for work as a consequence, which is helpful in supporting the sustainable development agenda in line with Thanet's policies.

It is therefore very important for 'mobile only' households that live and work and any businesses that operate in this part of the LPA's area, together with visitors and others who are staying in or travelling through the area, that the necessary indoor RF coverage is provided to enable them to have satisfactory mobile telephone and internet access.

On a wider scale, the proposal would contribute towards the country's connectivity and digital economy future. Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion.

The very high level of mobile phone use and ownership within the UK population is a clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

The Application Site will also provide new 5G services area around the site. The benefits of reliable mobile connectivity and 5G provision are widely recognised. The government recognises the importance of advanced communications infrastructure, such as the proposed development, as a key driver of economic growth. It considers digital connectivity as an essential service that should be readily accessible to everyone. In the latest report by the Department for Science, Innovation and Technology 'UK Wireless Infrastructure Strategy' April 2023, in the foreword the Secretary of State states that "*Connectivity has brought benefits for British households and British business, boosting growth, productivity, and opportunity for all. And change shows no sign of stopping. In fact, we find*

ourselves on the brink of a new revolution which promises to transform the world once more." She further states that *"5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone 5G will drive growth in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. 5G can improve our public services, too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis.*" "*This is an incredible opportunity; widespread adoption of 5G could see £159bn in productivity benefits by 2035. And it is exactly the kind of opportunity which the Department for Science, Innovation and Technology was created to seize. It is my personal mission as the Department's first Secretary of State to put Britain right at the forefront of scientific and technological progress. By bringing together world-class research and a dynamic business ecosystem, we can harness enterprise and innovation to grow the economy, driving forward the delivery of one of the Prime Minister's five priorities."*

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

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

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

The growth of mobile usage and increase in demand for mobile data is further highlighted in Ofcom's report 'Mobile networks and spectrum - Meeting future demand for mobile data (9 February 2022)'. According to this report *"In recent years we have seen an average 40% year-on-year growth in demand for mobile services provided over public mobile networks. This growth has been driven by the development of new applications and enabled by evolving technologies and consequent changes in consumer behaviour" (paragraph 2.6). The demand for mobile data is expected to "continue to grow as we rely on it ever more to carry out daily activities like shopping, gaming, banking and watching movies. Demand is likely to be stimulated further as new and more sophisticated applications are developed, and by the development of machine-to-machine and machine-to-device applications"* (paragraph 2.7).

In paragraph 1.1 of *"Ofcom's future approach to mobile markets and spectrum" report, it is stated that "We expect demand for mobile data to continue to grow as greater use is made of data-hungry services and as new technologies enable new uses." "Network quality is likely to be of growing*

importance to customers" (paragraph 1.2). Reliable and advanced infrastructure like the proposed development is required to support the increasing demand on the networks and to support the latest 5G technology required to deliver advanced mobile capabilities**.**

There is a clear need for the continuation of these services as the way people lead their lives is changing, as our dependence on these mobile networks increases. The emergence from lockdowns has seen a continuation of homeworking for a considerable proportion of the Country's workforce with the likelihood that this will continue, which has entailed the conducting of business meetings and attending conferences online which are integral in the economic recovery. Online grocery shopping and video calls to family members and friends have also continued and so the need for this replacement site is driven by our increased dependence on Operator networks that has grown year-on-year.

5. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

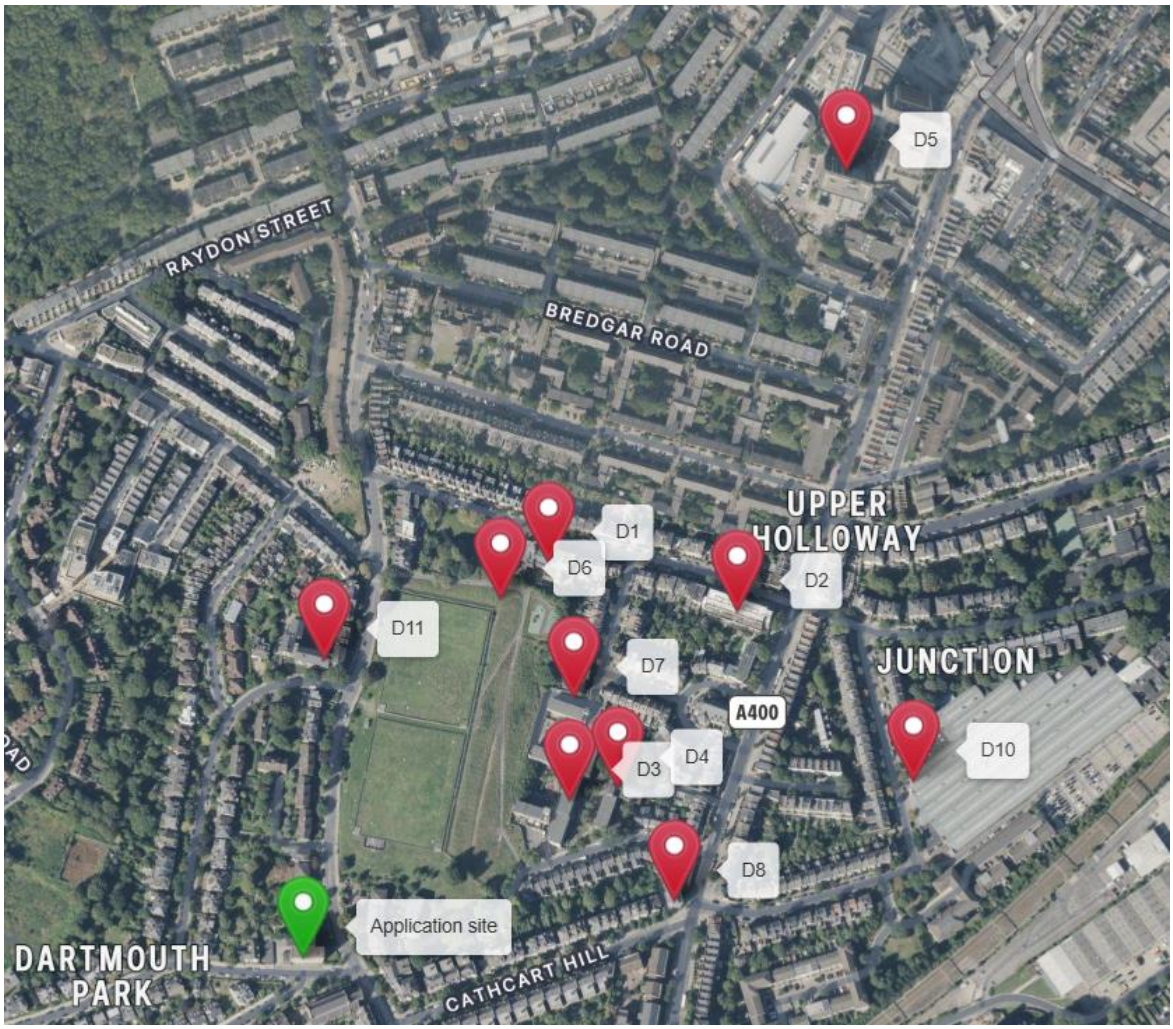
	Site	Site Name and address	NGR:	Reason for not choosing
D1	RT	Bickerton House, 25-27 Bickerton Road, London, N19 5JT	529109, 186499	There are rooftop terraces on this building, and it would not possible to devise a scheme which would be ICNIRP compliant. This option has therefore been discounted.
D2	RT	Silver Court, 1 Bickerton Road, London, N19 5JT	529243, 186468	The land falls away steeply in this area, resulting in the building having a lower ground height than the application site. Therefore, the site would not provide the required level of coverage to the target area. The site is not preferred by radio and has therefore been discounted.
D3	RT	Merryweather Court, Poynings Road, London, N19 5LF	529128, 186332	There are access problems with this site. In addition, it is understood there are also redevelopment plans for this estate. Use of this building would not provide the long-term site that is needed. Further to this the building is lower than Crest View and is on lower ground. An installation in this location would not meet the coverage requirement as successfully as the application site.
D4	RT	Brennand Court, Poynings Road, London, N19 5LE	529162, 186341	The rooftop of the building is not suitable for accommodating the necessary equipment. It does not have the structural capability to accommodate the required equipment. In addition to this the building is lower than Crest View and is on lower ground. An installation in this location would not meet the coverage requirement as successfully as the application site.
D5	RT	Hill House, Highgate Hill, Archway, London, N19 5JH	529312, 186781	This is the site which originally accommodated equipment for EE and H3G, and the building has now been redeveloped. When the Hill House site was lost, there was an overlap in coverage in the area close to Hill House from existing sites

				and there was a reduced level of coverage to the south-west. Therefore, it was decided to pursue a replacement site where it would replace some lost coverage but also improve coverage and capacity to the south-west, hence the Crest View proposal rather than a site closer to Hill House.
D6	GF	Dartmouth Park Hill Reservoir, Dartmouth Park Hill, London NW5 1JT	529075, 186473	A substantial greenfield site would be required which would have a greater visual impact than a rooftop site. In addition, there is a lack of space for an installation on the site.
D7	RT	Aveling House, Tremlett Grove, London, N19 5JY	529129, 186405	The rooftop of the building is not suitable for accommodating the necessary equipment. It does not have the structural capability to accommodate the required equipment. In addition to this the building is lower than Crest View and is on lower ground. An installation in this location would not meet the coverage requirement as successfully as the application site.
D8	RT	ECB Services, Junction Road, London, N19 5LB	529204, 186263	This building has been discounted as it is too low. In addition to this the building is on lower ground than Crest View. An installation in this location would not meet the coverage requirement as successfully as the application site.
D9	RT	Bacton Tower, Haverstock Road, Kentish Town, NW5 4PX	528055, 185334	This building is included as it was suggested by a resident as part of pre-application consultation for a previous application. Bacton Tower is an existing telecommunications installation for EE and H3G, located to the south-west, approximately 1.3 km from the application site. It provides coverage for an adjacent cell and would not meet this coverage requirement.
D10	GF	Holloway Bus Garage Pemberton Gardens, London, N19 5RR	529371, 186351	This site was considered as it would allow coverage to be provided from a non-residential site. The site is too close to an existing installation to the east and is on much lower ground than the application site. The coverage requirement could not be met from this location.
D11	RT	The Towers, Junction of Dartmouth Park Hill & Dartmouth Park Avenue, London, NW5 1JE	528951, 186426	There are few rooftops in the area which could accommodate the required equipment. This is a flat-roofed residential building north of the application site. It has a similar ground height but is a lower building than Crestview. In addition, there are trees immediately adjacent to the building which would stop the signal from the antennas propagating effectively. The site was therefore discounted.

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

N/A

A map is included below to illustrate the location of the discounted options - refer to numbering in the table above it is noted that D9 is not shown as it is located too far to the south-west):

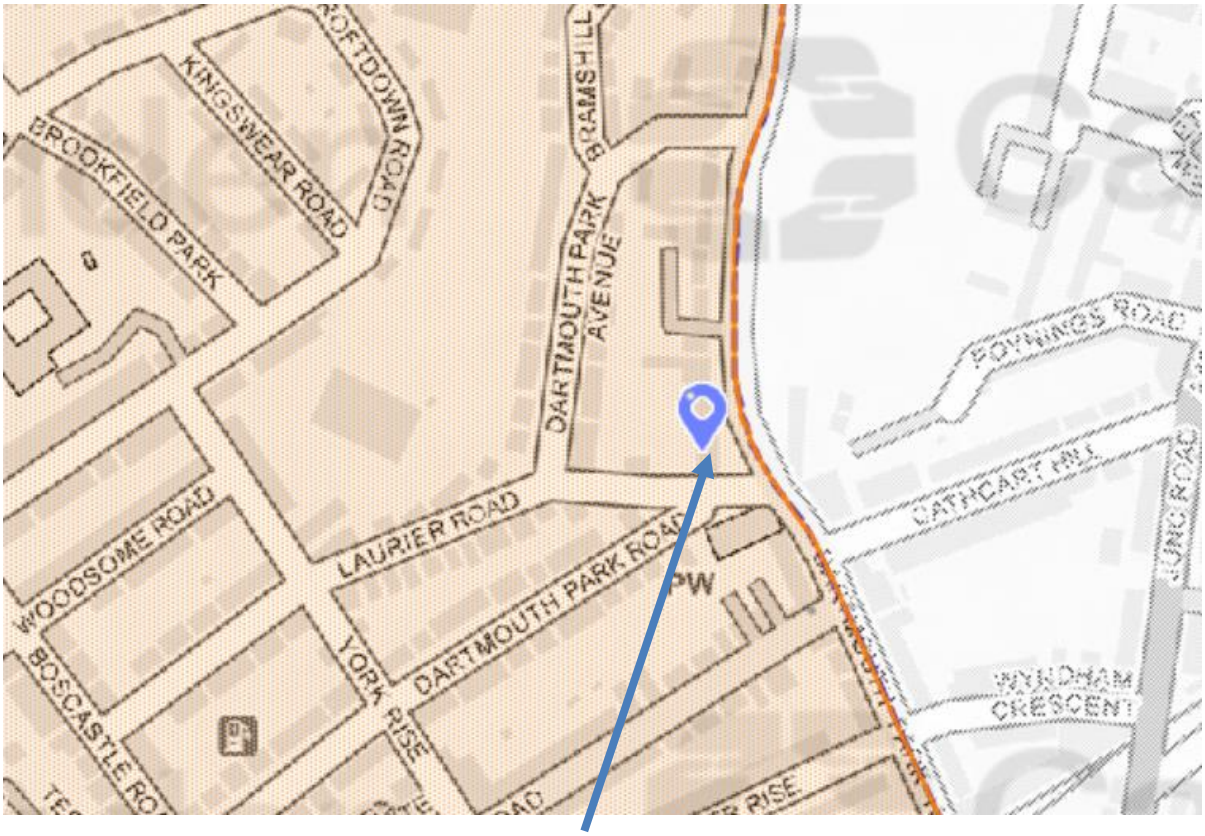


Source: Gridreferencefinder.com

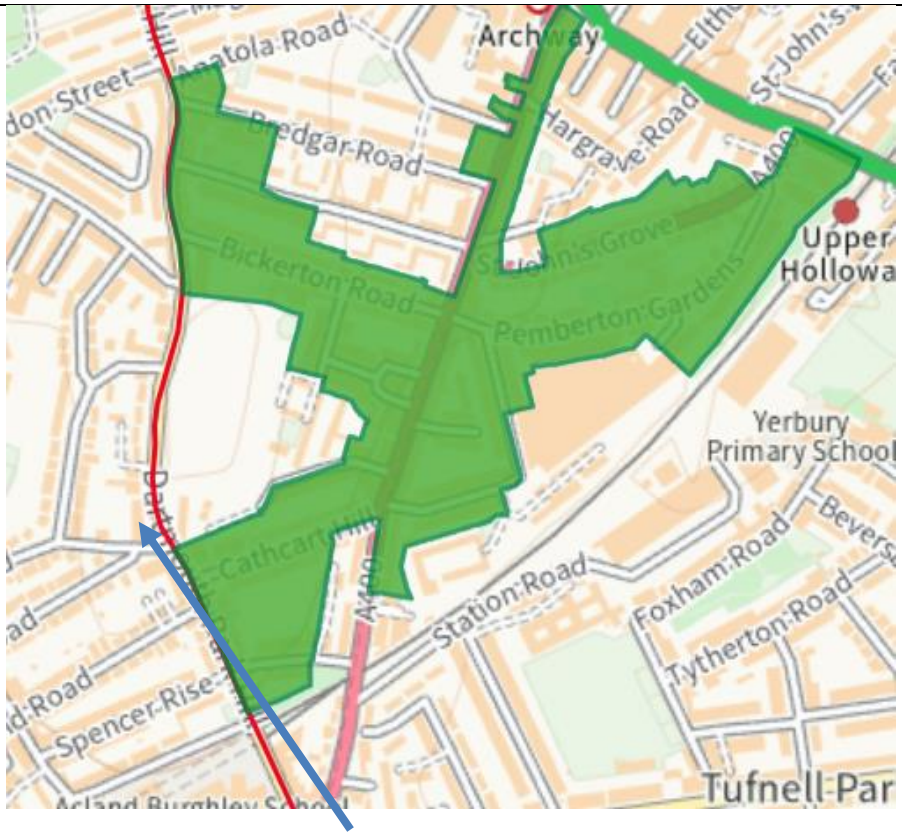
Additional relevant information:

Heritage Statement:

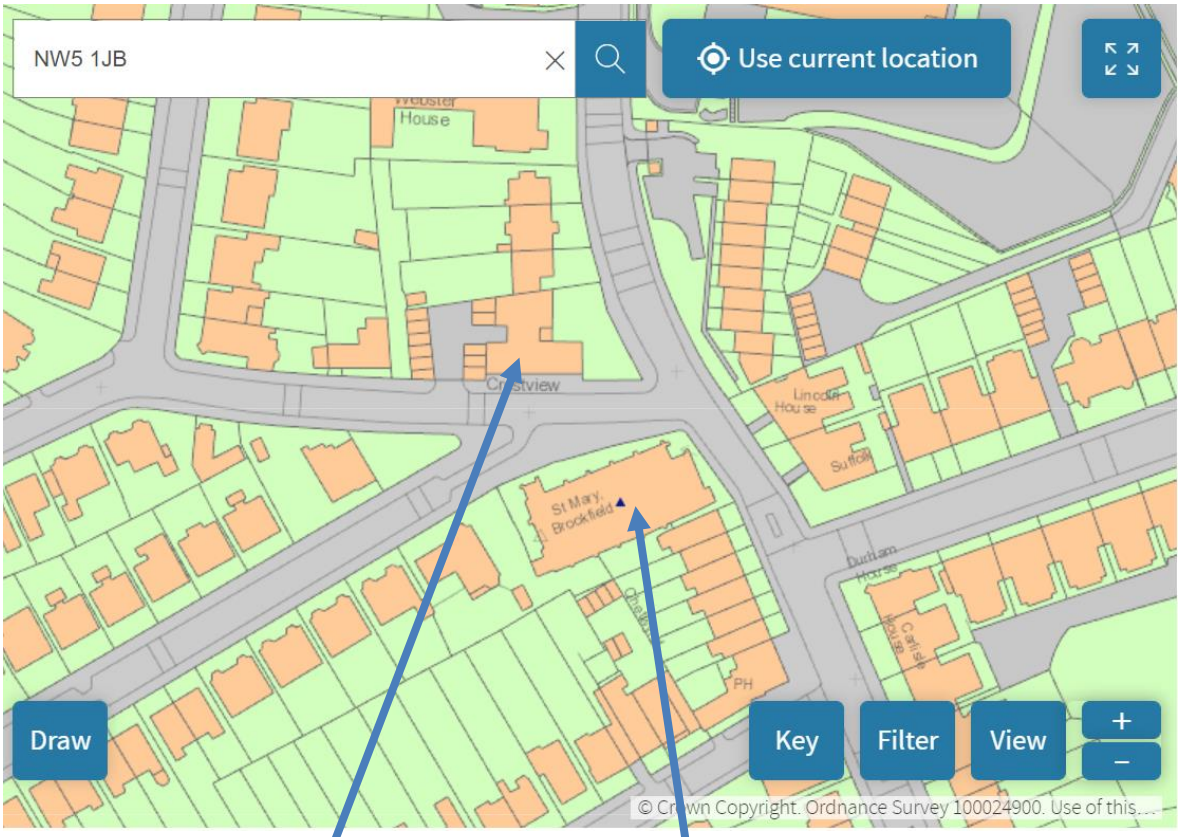
The main issue with the proposed development is its impact on heritage assets. The site is located within a conservation area, the Dartmouth Park Conservation Area (see map below – an extract of the Camden interactive maps):



The orange line on the map above denotes the edge of the conservation area, but it also denotes the Camden Council boundary. To the east is the Islington Council area, and there is also a conservation area (the St John's Grove Conservation Area) covering a significant area to the east of the site. This is shown on the extract of the Islington Council Interactive Conservation Area mapping facility below (with the application site shown by the arrow):



The site is also located close to a listed building. This is shown on the map below (extract of the Historic England search facility). The listed building is a Grade II* church located to the south of the application site, across Laurier Road:



Application site

Listed building

As can be seen, the site sits on the eastern boundary of the conservation area. Crest View is noted as a negative feature within the conservation area, hence the equipment is not proposed to be located on a building of any architectural merit.

Following on from the initial refusal a further search of the area was undertaken to assess whether there were any more suitable options. In particular, sites were investigated away from heritage assets, both the conservation areas identified above and listed buildings. Unfortunately, it has not been possible to find a more suitable option. This then led to assessing possible alternative design solutions at Crest View. One of these was the use of GRP (glass reinforced plastic) to screen the antennas.

In terms of GRP, this was investigated as a means of screening the antennas. To screen the antennas a large and substantial screen would be needed. A similar antenna height would still be needed (to provide the required level of coverage and meet ICNIRP requirements) and a screen of this height would have a greater impact than the chosen design solution, resulting in a substantial 'box' element onto the plant room of the building. In addition to this, designers considered that the building was not structurally capable of dealing with the additional loadings that would result from such a large structure.

Once the GRP option was discounted the only other means of reducing the impact of the equipment from the previously refused schemes was to look at an amended design. This element has already been discussed in the 'Reasons for choice of design' section above. It is considered the current proposed development, compared to the previous proposals, would have a reduced impact on visual amenity, and on heritage assets. With the number of antennas reduced from 6 to 3, the impact on the building would be reduced including, importantly, from the adjacent listed building. The equipment would still be visible, however the impact would be significantly reduced. It is considered that the impact on heritage assets would be less than substantial, and that this less than substantial harm would be outweighed by the significant benefits of the development, in terms of improved connectivity to the surrounding area.

The building is of little architectural merit, therefore its use is considered appropriate. The impact on both the host building and the surrounding area would be kept to an acceptable level. This will be illustrated in the following section, by the use of photomontages.

Within the constraints of the host building and surrounding area, and with the reduced level of equipment compared to the previous scheme, it is considered that the development would result in a less than significant harm to heritage assets. Whilst the equipment would be visible from certain viewpoints, these viewpoints would be limited and have been minimised as far as practicable. The specific design assists in keeping the overall impact of the development to an absolute minimum and ensures that any harm is outweighed by the significant benefits of the proposal.

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

> *"20. As set out in the National Planning Policy Framework (February 2019) (the Framework), any less than substantial harm to designated heritage assets should be weighed against the public benefits of the proposal.*
>
> *21. As set out in the Framework, advanced, high quality and reliable communications infrastructure is essential for economic growth and social wellbeing and planning decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. The scheme would support high quality communications and digital connectivity by providing 2G, 3G and 4G connectivity for two different nationwide networks that have a high market*

share in cumulative terms, as well as the future ability/opportunity to upgrade to 5G services.

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

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

It is noted the above decision refers to the 2019 version of the NPPF, however the wording of the 2021 version remains the same for the relevant section.

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

A further example is a more recent decision in Cambridge. Rooftop equipment was proposed, similarly on a building with little architectural merit within a conservation area and close to a number of listed buildings and structures (appeal reference: APP/Q0505/W/24/3345079). In allowing the appeal the Inspector noted at paragraphs 11, 17, 23 and 24:

"11. Situated in the Castle and Victoria Road Conservation Area, the appeal site is a relatively modern building predominantly of four storeys with a flat roof. Across the road from the appeal property is the River Cam and Jesus Green, the latter a broad open area with a number of associated listed buildings, which is situated in the Central/Historic Core Conservation Area. The appeal building's height and the prominence of its location in the context of the wide highway, the river, open space, and sparsely distributed low scale structures and features associated with Jesus Green mean that its roofscape is widely visible.

17. …the siting and appearance of the proposal would cause harm to the significance of the Listed Buildings and the Central/Historic Core Conservation Area, and would also fail to preserve the character or appearance of the Castle and Victoria Road Conservation Area.

23. …In this context the proposed development's provision of an improved data-based telecommunications network both for general users and the emergency services help to foster safe spaces, and to promote economic activity and growth alongside social wellbeing. These would be significant public benefits, which in this case tip the balance in favour of the proposal when set against the great weight given to the harm that it would cause to the significance of designated heritage assets. These benefits also clearly outweigh the conflicts with the development plan that I have identified. In arriving at this view, I have also taken into account the thoroughness of the appellants' site search exercise which sought to minimise harmful impacts, and the compelling reasons given for discounting the locations that could have had a more limited effect on the significance of heritage assets.

24. I therefore conclude on this main issue that the harm that the proposal would cause to the significance of heritage assets is outweighed by its public benefits. Accordingly, I

find that the proposal would be consistent with the Framework and Policy 61 of the Local Plan insofar as, and amongst other things, they require clear and convincing justification for any harm to designated heritage assets."

Both developments include a reduced 3 antenna scheme, and both are on more modern buildings within a conservation area and close to listed buildings. Both developments result in a level of harm to heritage assets, however the benefits of the developments are outweighed by the substantial public benefits of the respective developments.

Siting and Appearance

Following the previous decision the impact of the proposed development has been further reduced. Both the number of antennas and equipment cabinets has been reduced. It is considered this revised development would not appear excessive. The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and keeping harm to an absolute minimum.

The impact on the building and surrounding area would be minimal, in terms of impact on visual amenity and heritage assets, and the resultant level of harm is considered to be less than substantial. The less than substantial harm would be outweighed by the significant benefits of the proposal, with two Operators achieving replacement and enhanced coverage to the area. The site would provide coverage for both EE and H3G, therefore helping to keep the overall number of installations to a minimum. The alternative of EE and H3G proposing separate installations would have a greater overall impact.

To illustrate the impact of the proposed development photomontages have been produced. The photomontages are included as a separate document included with the application. Three locations have been chosen. These are based on locations that were highlighted in the delated report for the previous application. The first location is taken from Dartmouth Park Road, looking north-east towards the site, from a distance of approximately 165 metres. The proposed montage is copied below:

Photomontage location 1

From this location the equipment would be clearly visible on the roof of the building. A slightly different photograph location was chosen to ensure the roof was fully visible through the street trees on Dartmouth Park Road. Although visible, it is considered the limited amount of equipment and the bulk of the host building, ensures the impact is not excessive, in terms of the impact on the host building, visual amenity and heritage assets. It is noted that the trees along Dartmouth Park Road would provide a high degree of mitigation, the level of mitigation dependant on the specific viewpoint.

The second location is from Dartmouth Park Hill, looking west towards the proposed site, at a distance of approximately 140 metres:

Photomontage location 2

This location was chosen as it also shows the listed church to the rear of Crest View. In this view the antennas would be clearly visible, however the equipment would be screened by the plant room. The slender profile of the antennas and support poles would ensure the impact of the development would be kept to a minimum. As previously noted, there would be a level of harm to heritage assets, however this would be less than substantial, and this harm would be outweighed by the public benefits of the proposal.

The final location is a longer range view taken from the field close to the Parliament Hill Athletics Track, looking north-east towards the site at a distance of 1.04km. Concern was raised in the Delegated Report in the previous application as to the impact of the proposal from local parks and public vantage points, including Parliament Hill.

Photomontage location 3

The host building has been highlighted on the final photomontage. From this view, the impact of the equipment is mainly mitigated by the distance from the open space to the proposed site. It would be possible to pick out the equipment on the roof of the building, however this would not be intrusive from this location. In addition, the substantial trees on the open space would screen the host building from a number of viewpoints.

Whilst the proposed antennas and equipment cabinets would be visible from certain viewpoints, it is not considered there would be a significant impact on the area given the minimal level of equipment and the slender form of the antennas and support poles. The equipment cabinets are set back from the edge of the building so would not be widely visible.

It is further noted that the LPA previously deemed this building to be suitable to accommodate telecommunications equipment. An installation, comprising pole mounted antennas and equipment cabinets was housed on the building between approximately 1995 and 2007. This current proposal has been designed to replicate as closely as possible the previous equipment on the building, with both schemes based on three pole mounted antennas around the plant room. Although the current scheme is a larger development, this is because the range of services provided has expanded greatly requiring larger antennas and more equipment cabinets. Despite the increase in scale, the fact that the building was previously considered appropriate to accommodate telecommunications equipment is considered relevant, particularly with this new scheme proposing 3 no. support poles off the plant room of the building. The building remains a suitable building.

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the less than substantial harm it may impose on the surrounding area being balanced by the provision of replacement and enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2024) (NPPF)

The National Planning Policy Framework came into force in 2012. The guidance has most recently been revised in December 2024. The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "*The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner*". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

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

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

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

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

"*c) approving development proposals that accord with an up-to-date development plan without delay; or*
d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination."

Further to this, paragraph 39 states that "*Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area*."

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

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

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

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

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

Leading on from this, paragraph 119 states that "*Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections*".

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 120 states that "*The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged*".

By utilising a single rooftop development to provide replacement and enhanced coverage for two Operators and for multiple technologies, the proposal is in line with the above policy.

It should be noted that paragraph 122 states that "*Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure*".

In terms of heritage assets, section 16 of the guidance deals with 'Conserving and enhancing the historic environment'. Paragraph 202 sets out that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 215 states: "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."* As set out in the preceding section, it is considered there would be a less than substantial harm, and this harm would be outweighed by the significant benefits of the proposal.

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

Development Plan Policy

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

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

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

The London Plan

'The London Plan 2021' (March 2021) is the Spatial Development Strategy for Greater London, setting out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The Plan is part of the statutory development plan for London that will inform assessments and decisions made for development proposals across London moving forward.

Within the Foreword, the Mayor provides an overview of the aims set out within the plan (emphasis added in the following extracts):

"*it's about making London a city with clean air for our children to breathe, and a pioneering smart city with* ***world-class digital connectivity supporting more digital devices to improve the lives of Londoners and enable businesses to thrive****."*

Within Chapter 1., "Planning London's Future – Good Growth", the plan states at paragraph 1.0.10 that:

"A city that is planned well can improve as it grows. Planning for the right number of homes and higher levels of affordable housing will take advantage of London's growth to re-balance the housing market. Planning for mixed use developments in all parts of London will spread the success of London's economy and create stronger communities where everyone feels welcome. Planning new developments to reduce car dependency will improve Londoners' health and make the city a better place to live. ***Planning for a 'smarter' city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners****".*

This is followed at paragraph 1.5.4 with:

"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".*

Paragraph 6.8.3 of the London Plan recognises that the Tech and Digital sector "supports the growth and evolution of all sectors in the economy".

Policy SI 6 is particularly relevant to the proposed development, dealing with Digital connectivity infrastructure. The policy states:

"Digital connectivity infrastructure

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

1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users
2) meet expected demand for mobile connectivity generated by the development
3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation
4) support the effective use of rooftops ***and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.***

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

The supporting text of the policy states:

*"**The provision of digital infrastructure is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance**…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"* (paragraph 9.6.1).

Policy SI 6 clearly recognises the significant socio-economic benefits of digital infrastructure in London, which is a material consideration in itself. The policy acknowledges that London's digital capability is currently restricted and that there is need to identify locations where provision is inadequate. In this case the proposed development seeks to provide replacement and enhanced coverage to the area for the EE and H3G networks.

It is also significant that suitable mobile connectivity is now a policy criterion in assessing applications for new development proposals, as set out at paragraph 9.6.50. It is clearly recognised that inadequate connectivity, which includes coverage provision and network capacity capabilities, can hinder the approval prospects of developments planned, which has socio-economic implications for the local area and London more generally. The proposal is exactly the type of development supported and encouraged by the London Plan to meet the Mayor's objectives for London to enhance its global economic competitiveness.

. The London Plan is highly supportive of high-quality communications infrastructure such as the proposed development, and in turn the essential infrastructure proposed will assist in meeting the Mayor's objectives of ensuring that London can compete on a global scale in terms of social, economic and environmental aims. The revised guidance is clearly supportive of the proposal and the role that it will perform allowing the EE and H3G networks to provide enhanced coverage and capacity to the surrounding area.

Local Plan

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

Also relevant is the Dartmouth Park Neighbourhood Plan 2020. This document has policy DC2 – Heritage assets, which mirrors in its aim as D2 of the Camden Local Plan to preserve or enhance historic assets in the area.

The search for a site followed a sequential approach which resulted in the progression of the application site, which was previously considered appropriate to accommodate telecommunications

equipment (an installation was on the roof between approximately 1995 and 2007). Within the constraints of being located within a conservation area and close to a listed building, the equipment has been sited to ensure the impact on the surrounding area would be minimised as far as practicable. Compared to the last application, now only three antennas are proposed, with also a reduction in the number of equipment cabinets on the roof of the building.

Whilst there would be an impact on the surrounding area and heritage assets, it is considered there would be a less than substantial impact on heritage assets, and this less than substantial impact would be outweighed by the significant benefits of the proposal, as set out previously in this document.

Also, to note is Camden Planning Guidance – Digital Infrastructure (2018). This document sets out as a key message that "*The Council will support the expansion of electronic communications networks, including telecommunications and high speed broadband*" and goes on to set out that proposals for telecommunications equipment will be determined in accordance with the National Planning Policy Framework (see section above).

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy, it proposed the use of a rooftop site and minimises the number of installations by sharing and would provide coverage for a wide range of technologies. It is of significance that the development ensures a continued and enhanced provision of local community facilities and services.

Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for a continued and improved quality of service.

The specific requirement of the operators in this instance is to provide replacement connectivity and network enhancement to the area, with a minimal impact. This site achieves this aim. The proposed development is compliant with the NPPF. This siting and design is considered the most appropriate solution to providing the coverage requirements to the area.

The further reductions in the level of equipment on the building has led to a reduction in its impact on the host building, on visual amenity, and on heritage assets. It is considered that the level of impact would be outweighed by the significant benefits of the proposed development

The proposal is fully compliant with ICNIRP guidelines.

Confirmation that submitted drawings have been checked for accuracy

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Signed:	Chris Andrews	Date:	30/12/2024
Position:	Planner	Company (Agent): (on behalf of EE Ltd & H3G Ltd)	Waldon Telecom (Agent) West Lodge Station Approach West Byfleet Surrey KT14 6NG