SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Holborn Tower	Site Address:	137-144 HIGH HOLBORN, BLOOMSBURY, LONDON, WC1A 2BA.
National Grid Reference:	E: 530337 N: 181508		
Site Ref Number:	CTIL20625923_ TEF044383_ VF01542	Site Type:[1]	MACRO

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	**No**
If no explain why: It was felt that the industry database was a more up-to-date source of information.		
Were industry site databases checked for suitable sites by the operator:	**Yes**	No
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: A pre-application consultation letter, consultation plan and drawings were sent to the Local Planning Authority by email on 01/05/2025. A response was received on the 2nd May requesting a fee for the service. Given the time constraints associated with the roll-out of this project, it was deemed more valuable to discuss the proposal with the Case Officer during its determination.	

[1] Macro or Micro

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Annual area wide information to planning authority

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

Community Consultation

Rating of Site under Traffic Light Model:	Red	**Amber**	Green
Outline of consultation carried out: Pre-application consultation letters and drawings were sent to the LPA, Ward Councillors, MP, and Head Teachers of local schools on the 1st of May 2025.			
Summary of outcome/main issues raised (include copies of relevant correspondence): This provides an opportunity for local stakeholders to discuss development proposals and identify site-specific issues. No responses were received.			

School/College

Location of site in relation to school/college (include name of school/college): Guildhouse School, St Joseph's Catholic Primary School and Turtles Nursery are all located within 200m of the proposed application site.
Outline of consultation carried out with school/college (include evidence of consultation): Pre-application consultation letters and drawings were sent on the 1st of May 2025.
Summary of outcome/main issues raised (include copies of main correspondence):

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No responses were received.

Civil Aviation Authority/Secretary of State for Defence or the operator of the civil safeguarding area or defence safeguarding area notification (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: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	No
Date served:	15.05.2025	

Proposed Development

The proposed site:
Government is committed to supporting investment in high-quality, reliable digital connectivity so that communities can benefit from faster economic growth and greater social inclusion. It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. WHP Telecoms have been commissioned to act on behalf of Cornerstone for the proposal in front of you. The specific proposal to provide the most up-to-date technology comprises the erection of 3no. antennae, 9no. RRUs, 1no. cabinet and ancillary development thereto. The technical details of this proposal are illustrated within the enclosed application design drawings: - (E301814_CTIL20625923_TEF044383_VF01542_DD_REV_A Planning Drawings). As part of VMO2's continued network improvement program, there is a specific requirement to introduce new 5G coverage at this location, ensuring that this part of London will have access to the most up-to-date technology in line with the Operator's licence requirements. The proposal also hopes to improve upon capacity issues currently affecting the local 4G service provision. Paragraph 66 of the Code of Practice for Wireless Network Development in England clearly outlines the need for a densification in the network; *'With the introduction of 5G, more equipment will be required to provide coverage and capacity. 5G, as well as 4G, are data-driven technologies, and high volumes of*

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data will be transmitted between base stations and wireless devices. 5G will require a denser network of base stations than previous generations. The siting of 5G installations will be more constrained and guided by these special technical and operational considerations.'

In essence, the existing network is struggling to serve this target cell area, and therefore a new base is required to ensure that coverage and capacity requirements are enhanced in line with the operator's license. The Applicant has taken advantage of a valuable site-sharing opportunity in accordance with their joint venture with Vodafone under the Cornerstone partnership. This particular siting is considered consistent with planning policy, which encourages the upgrade and sharing of existing base stations before proposing new installations. The visual impact associated with this marginal intensification of equipment is considered to be somewhat unnoticeable to bystander's, particularly given that the building has long accommodated telecommunications infrastructure. The slight differences can be seen in Figure 1 and in the photomontage document enclosed with this application.

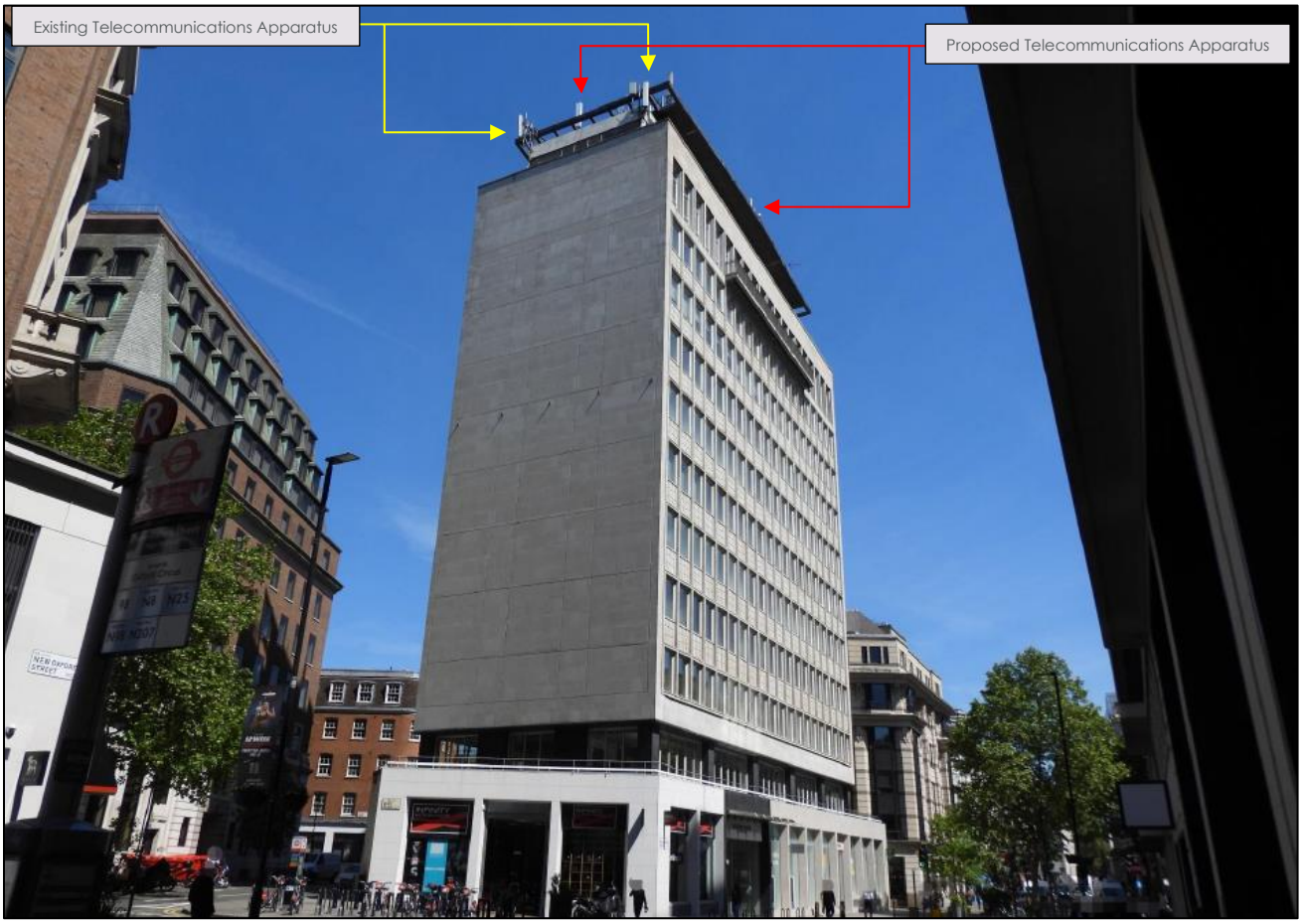

Figure 1: Streetview photomontage of the existing and proposed equipment on Holborn Tower

Another critical technical requirement/operational constraint for the reader to acknowledge is the fact that 5G technology utilises higher radio frequencies so that significantly more data can be transmitted but, as a direct consequence, it cannot propagate as far or through

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material as well and the cell areas will be smaller, creating a need for a densification within the network. This gives rise to the need for this application. Due to the shorter range, it is therefore a necessity that base stations are sited as close to the demand as possible and the Applicant would like the reader to acknowledge that demand for network coverage is always most prevalent within dense urban areas. Confirmation of this is available within Paragraph 37 of the Code of practice for wireless network development in England which articulates:

> *'New ground-based masts will sometimes be required to accommodate the ever-increasing coverage and capacity needs of the country. 4G and 5G are likely to require further network densification in order to meet growing customer demand for data. Where higher frequencies are used, with lower signal propagation characteristics, apparatus will need to be located in closer proximity to user devices.'*

It is recognised that the very nature of installing new 5G communications infrastructure within a densely populated area requires a well-measured balance between the need to extend practical coverage with the risk of increasing visual intrusion. The search process involved an initial 'desk-top' survey to ascertain and identify major constraints and impediments, followed by a physical search of the area. This proposal has therefore been strategically placed by radio planners in conjunction with a team of multi-skilled professionals, in an area that is expected to have the least overall impact in terms of dominance and 'harmful' short-fixed views but unfortunately, a level of visibility is always inevitable.

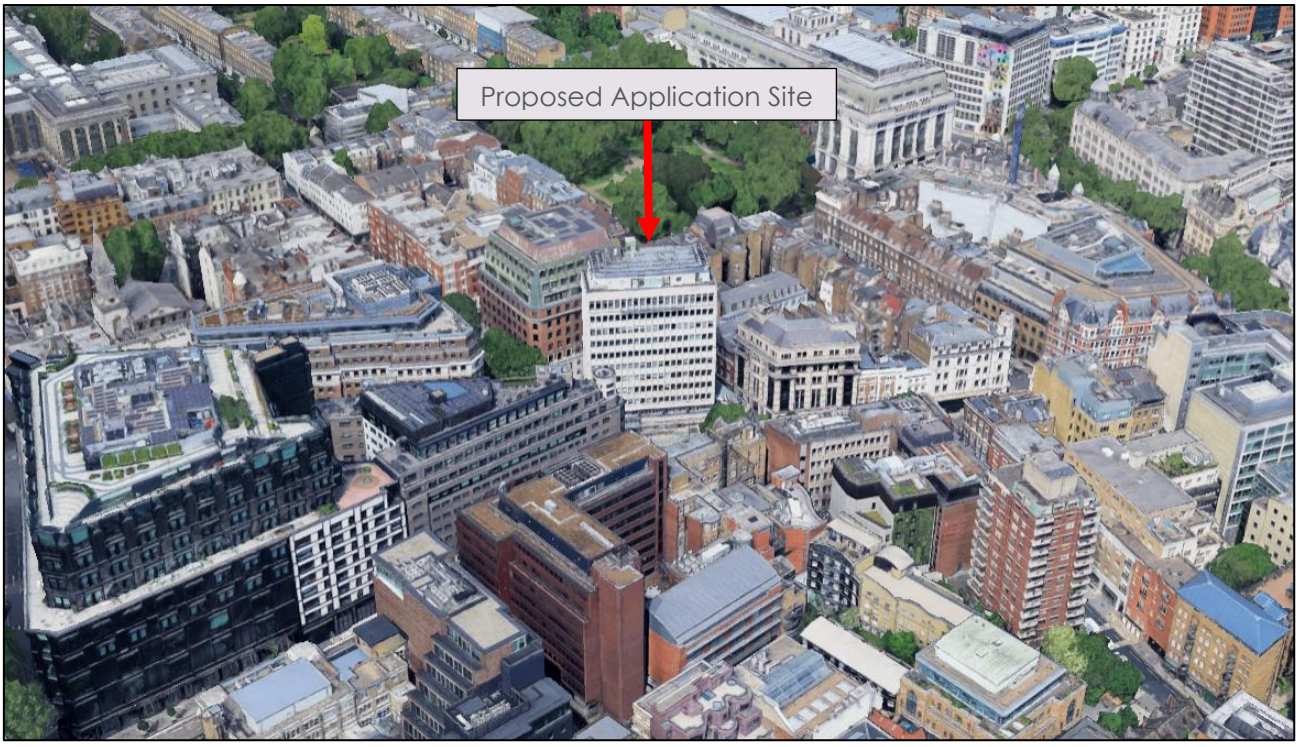

Figure 2: Aerial View of the Proposed Application Site in the context of the surrounding area

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It is paramount for the Applicant to discuss the tower's location within the Southern fringe of Bloomsbury Conservation Area where the built environment is rich in heritage and urban design. This is a key material consideration in the determination of this application. It spans across approximately 160 hectares, stretching from Euston Road in the north to High Holborn in the south, and from Tottenham Court Road in the west to King's Cross Road in the east. The Conservation Area is outlined below in Figure 3.

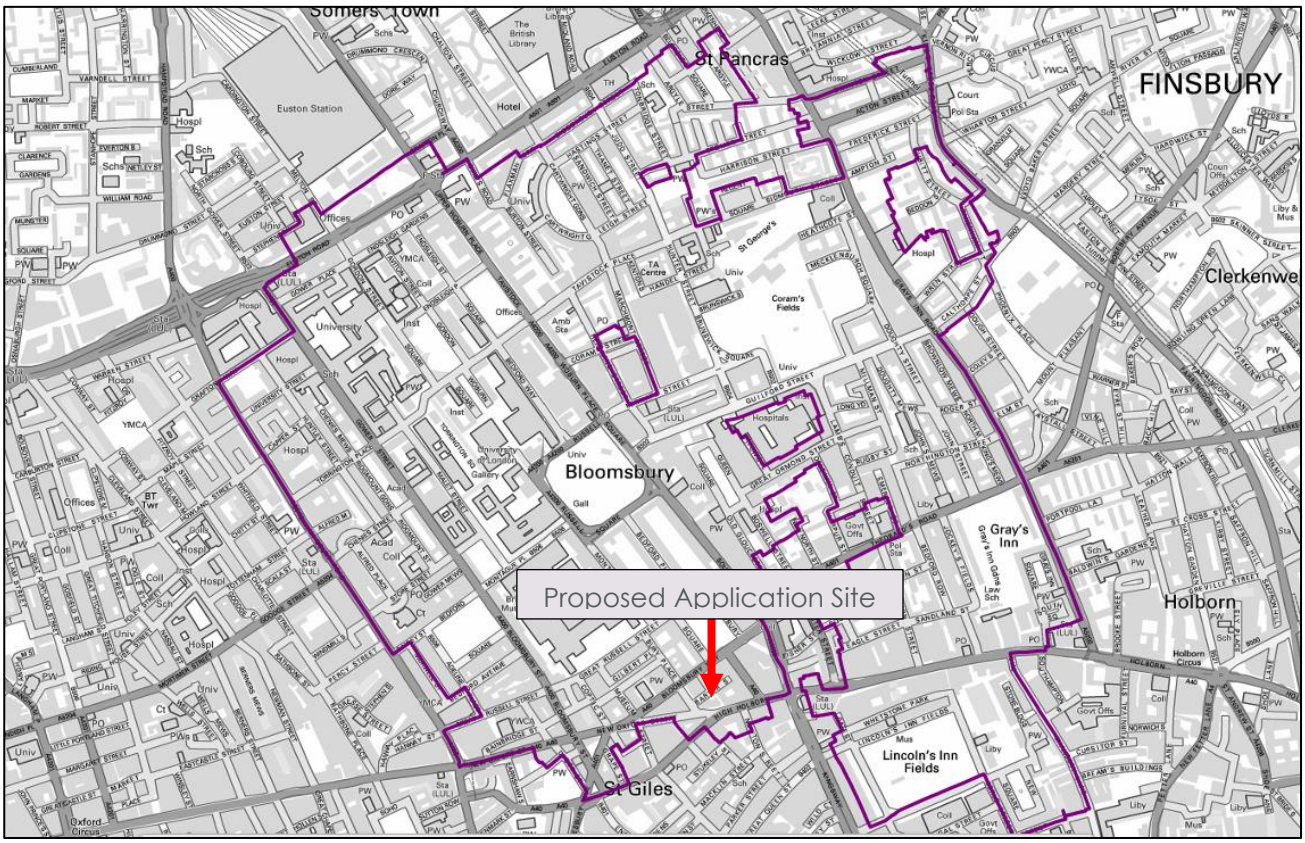

Figure 3: Map showing Bloomsbury Conservation Area outlined in purple

The *Bloomsbury Conservation Area Appraisal and Management Strategy*, adopted by Camden Council in April 2011, provides a comprehensive framework for preserving and enhancing the historic and architectural character of Bloomsbury. This document is instrumental in assessing planning applications within the conservation area and guiding development to ensure it aligns with the area's unique heritage. The proposal acknowledges and responds to the defining characteristics of the Bloomsbury Conservation Area, including the distinctive relationship between its formal landscaped squares and the surrounding built form, all set within a coherent grid-like street pattern. The area's consistent street layout, strong spatial hierarchy, and predominant architectural forms contribute to a cohesive and legible urban structure. It is also notable for its exceptionally high concentration of listed buildings and monuments, including nationally significant landmarks such as the British Museum.

The appraisal continues to divide Bloomsbury into 14 sub-areas, each with distinct architectural and spatial characteristics. Sub Area 8 relates to the proposed application site

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and so it is paramount for the Applicant to discuss this in greater detail. Sub Area 8 encompasses the prominent thoroughfares of New Oxford Street, High Holborn, and Southampton Row, acting as a vital commercial and institutional corridor, characterized by its robust urban form and significant architectural landmarks. The area features a mix of mid- to late-19th-century commercial buildings, with some earlier structures, reflecting the Victorian and Edwardian architectural styles. Predominant materials include brick, stone, and terracotta, with decorative elements such as cornices, pilasters, and arched windows contributing to the area's architectural richness.

The specific appraisal highlights many key buildings within the Conservation Area, including University of London's Senate House and the former Central Saint Martins College of Art and Design, but notably, the subject proposal sits at what the Applicant considers to be suitable distances, where several built and natural landscape features intervene to ensure that no adverse harm is inflicted upon these sensitive receptors.

Similar to the surrounding area, it is defined by its grid street pattern, with wide streets and regular building plots, contributing to a sense of openness and clarity. The streets are lined with mature street trees, and the presence of historic paving materials adds to the area's character. Buildings typically range from 4 to 6 stories, with consistent parapet lines and roof profiles, maintaining a cohesive skyline. The document does mention the topic of telecommunications equipment, as per the below;

> *'The increase in the number of mobile phone users is leading to an increased demand by operators for telecommunications equipment. Masts are frequently mounted on tall buildings and could potentially be prominent within the Conservation Area.'*
>
> *'Prominent external telecommunications apparatus, including cable runs, can harm the appearance of an historic building. Efforts should be made to find discrete solutions appropriate to the character of the area. Guidance on the installation of telecommunication equipment including mobile phone masts, satellite dishes and aerials can be found in the Camden Supplementary Design Guide or by contacting the Planning Services above.'*

The *Camden Supplementary Design Guide* has since been updated and integrated into the broader *Camden Planning Guidance (CPG)*, but its principles continue to influence development proposals. This will be discussed in more detail within the local policy and guidance section. Several photomontages from short ranging viewpoints are included below along with an in-depth analysis of the specific siting and design measures.

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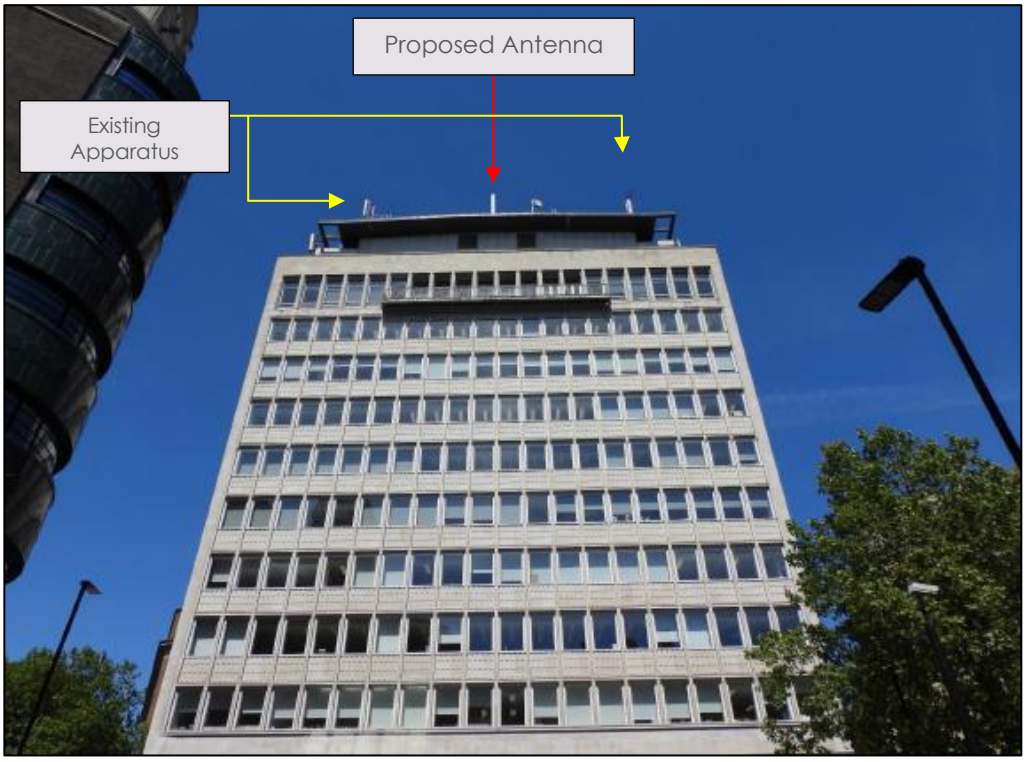

Figure 4: Photomontage of the proposed application site on High Holborn, facing North

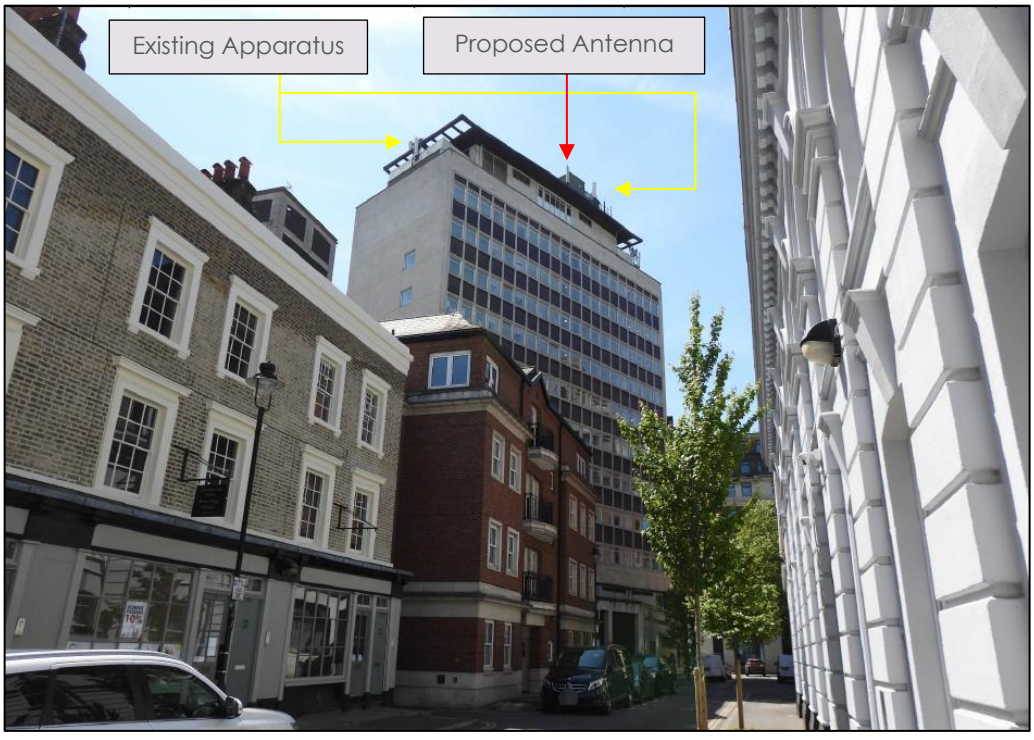

Figure 5: Photomontage of the proposed application site on Barter Street facing Southwest

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Figures 1, 4 & 5 portray typical urban characteristics, where areas are densely populated with high rise buildings. These land uses, in London City Centre, are typically occupied by commercial land uses which ultimately reduces the volume of residential views, helping to protect residential amenity. The building sits amongst several high-rise buildings, peering just above them - for efficient signal propagation – restricting the level of visibility. The presence of these tall buildings in an encompassing nature helps to obscure visibility of the rooftop past the first layer of the built environment, ensuring that the visual impact is kept within a short, localised range.

From Viewpoint 3 – along High Holborn, facing West – visual change is minimised by the strategic placement of apparatus. Viewpoint 5 also shows how the built and natural environment can intervene to create visual distractions, allowing the proposal to be absorbed amongst the environment.

Overall, visibility of the rooftop is considered to be low, intermittent and eclipsed by the surrounding environment. To the Applicant, this rooftop is viewed as an ideal siting opportunity from a technical and town planning perspective as the antennas will be well enough elevated to clear any landscape features that would typically block signal waves. In addition to this, it allows the equipment to be sited well above eye level and out of normal perspective. It is considered that one would have to search for its presence rather than it being overly dominant within the street scene. The proposal follows the sequential approach to site selection outlined within national planning policy. Overall, the scheme is thought to be visually reduced as it proposes to site share on an established rooftop, compared to a significant streetworks option, where the pole would have to be tall enough to clear the built and natural environment. It would have a greater visual presence and impact upon the street scene, affecting key conservational characteristics.

Many of the surrounding rooftops host similar telecommunications and general apparatus which, on the most part, is largely invisible from the ground. The Applicant has tried to minimise visual impact by hiding cables and pole supports as far as possible. It is appreciated that the equipment's location on the edge of the building can increase visibility, but it is paramount for the reader to acknowledge the technical reasoning behind this placement. More information is provided within the 'Cornerstone Radio Planning and Propagation V6' document, but in essence, this placement is absolutely necessary to abide by the stringent ICNIRP regulations and secondly, to avoid signal clipping by the building. An alternative which would allow the equipment to be set back from the edge would entail a large stub mast on the rooftop, but the increased height and width associated with this option was considered to be much more dominant and out of character for the building and wider conservation area.

The Applicant recognises the visual concern of installing apparatus in a position that may break the skyline, but the Applicant has made sure that the overall height has been minimised as far as practically possible, whilst remaining technically feasible. The antennas will be fixed to new tripod support poles which will be mostly screened behind the length of the antenna. It represents a sensitive design solution that Camden Council previously accepted for the existing equipment. The antenna colouring should reduce visual impact further by assimilating

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with the existing antennas and the commonly grey English sky, but if the LPA consider another colour more appropriate, then please know that the Applicant is open to discussing alternative options further. In addition to this, the proposal is for equipment that is commonly found in such urban locations and so it shouldn't look untoward in this context, especially when the visual change is balanced with the immense public benefit of deploying connectivity improvements within the city centre of London.

The urban street scene is vast in nature which helps to reduce the proposal's dominance. The A40 branches off into several forks at this location, allowing the street scene to span up to 40m in width, with countless visual distractions in between. It is not a continuous or monotone street scene as it hosts an abundance of changes in scales, shapes, decoration, colours, textures, tones, and grains, and so, it is believed to have a natural ability to comfortably absorb and host this level of visual change. Figure 6 shows the open nature of the street scene with the built environment screening most of the Holborn Tower. When one takes an aerial view of the surrounding area, there is a high volume of rooftop apparatus, mostly screened behind facades. The Applicant would like to stress that this type of infrastructure cannot be screened for technical reasons, but the presence of protruding elements at varying heights should help this small scale of development fit in. The apparatus has also been placed at a lower height that the two plant rooms and so the level of sky lining, is thought to be minimal.

Figure 6: Streetview of the proposed application site on New Oxford Street facing East

These reasons provide the Applicant with the reassurance that overshadowing or loss of daylight should not be a significant concern, especially considering the low density of

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residential properties in this location. The Applicant has been proactive with its design to ensure visual impact is minimised as far as practically possible. Typically, base stations utilise three sectors 'spraying' signal outwards like an aerosol in a 120-degree bearing, but this design has strategically grouped the antennas whilst respecting the vertical and horizontal separation distances that are required for new 5G technology to avoid interference. This is a legal obligation in line with the Operators license agreements that are granted by Ofcom.

The Applicant does not anticipate that a large volume of direct and front facing views will be activated due to the proposal's specific siting and design measures, and the transient nature of views that is thought to be less impactful than those fixed, residential views, especially considering the intermittent nature from the high-rising environment. Ultimately, views are expected to be short ranging, containing visibility within a 100m – 150m range.

The site selection process followed the sequential approach that is outlined within national planning policy, which makes Operators site share where it is technically possible, then search for feasible rooftop options before deploying a new ground-based installation. It is important to note the visual benefits of a rooftop deployment, especially within such a high-rise environment. If a ground-based installation was to be installed here, it would have to be a significant pole height in order to clear the built and natural environment, which would appear highly dominant and out of character.

The proposal also ensures that pedestrian movement is not impeded as the development will not cause an obstruction to any nearby footpath networks or require tree lopping, helping to reduce disturbance whilst safeguarding the protected environment as far as practically possible. There will remain a suitable passing distance for wheelchair and pram users, and the proposal is also sited away from tactile paving and crossing points.

It's worth noting, just because a development is generally visible does not necessarily equate to a significant detrimental impact. It is likewise important to note that the design itself is typical of such furniture found in urban rooftop locations and as such should not look inappropriate in the context of existing vents, AC units and raised skylights. The elevated plant rooms rise circa 4m above the main roof level which should help to provide a level of foreground and background screening from elevated views. It is often only found when actively seeking out its presence and it is considered that the overall character of the area will not be detrimentally affected by the development and over time should become an accepted element of the street scene.

It is important that the reader appreciates that it is almost impossible to introduce new infrastructural elements to any environment without some degree of impact. Indeed, with communications infrastructure, it is virtually impossible to physically enhance the setting in which it is located and more often than not, all that can be done is seek to limit impact to an absolute minimum through sensitive siting and design practices, as has been the case.

The equipment is considered unlikely to have any material impact on the local area, however it should bring significant connectivity improvements, which is a material consideration in the judgment of the site suitability. The cell search area was assessed at the survey stage from the

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perspective of planning and residential amenity, while a detailed site evaluation, in line with the Local Development Plan and relevant saved policies has helped shape this application.

The Government's National Planning Policy Framework sets out that an advanced, high-quality communications infrastructure is essential for sustainable economic growth. The development of high-speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.

As the shift in demand is expected for the foreseeable future and that as central government considers digital communications to be a critical national infrastructure, the intention is to support customers and local residents by ensuring as little disruption as possible.

Enclose map showing the cell centre and adjoining cells if appropriate:
A map can be provided upon request.

Type of Structure *(e.g. tower, mast, etc):*		
Description: The specific proposal to provide the most up-to-date technology comprises the erection of 3no. antennae, 9no. RRUs, 1no. cabinet and ancillary development thereto.		
Overall Height:		49.00m AGL
Height of existing building *(where applicable):*		48.50m AGL
Equipment Housing:		
Length:		See drawings enclosed
Width:		See drawings enclosed
Height:		See drawings enclosed
Materials (as applicable):		
Tower/mast etc – type of material and external colour:	Galvanised	
Equipment housing – type of material and external colour:	Standard Finish coloured Grey [RAL7035]	

Reasons for choice of design, making reference to pre-application responses:
As previously mentioned, the proposal is required due to acute 4G capacity issues and for the national roll-out of 5G coverage in an area that has not gained this level of connectivity from VMO2 yet. The applicant would reiterate that the siting of any base station proposal is intrinsically linked to operational need, the availability of sites and the land uses present within the target area. The design of a base station is in turn dictated by function and the context of the nominated site.

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The cell area was searched for existing sites in line with the sequential approach to site selection and so in this instance a detailed account of alternative sites is not required. This is due to the upgrade of an existing site to facilitate sharing with another operator. New roof and ground-based installations were avoided due to the Operators willingness to follow the chronological order in the sequential test. A significant pole height would be required to clear the built and natural environment in this location to cover the entire target area. A streetworks pole would have the potential to be overbearing and dominate within the street scene.

As form follows function, the very nature of 5G and the network services it provides, means the equipment and antennas are quite different to the previous, and existing, service requirements. A technical justification for the design follows;

5G technology uses higher radio frequencies whereby the attenuation of signal is naturally higher than before, but this also makes the signal more susceptible to the built and natural environment. The antenna height must be sited at a height that is operational and economically feasible. If the equipment was sited any lower, it would be blocked by the built environment and require a second feeder sites to cover the same footprint. This is contrary to planning policy as it would result in the proliferation of masts.

For the same reason, 5G antennas cannot be shrouded as it would have an overwhelming impact upon the quality of signal, leading to the proliferation of masts.

5G also uses adaptive beamforming technologies, unlike previous generations and this increases capacity and data speeds to the user but requires a taller antenna height.

With 5G antennas operating at higher radio frequencies, it also creates new ICNIRP requirements for the Applicant to comply with. The simple, low-profile design on the edge of the building was favoured over a stub mast option, in terms of satisfying the ICNIRP regulations and ensuring a sustainable coverage.

Following on from this, 5G technology also requires a level of vertical and horizontal separation distances between those 5G antennas and those that provide a signal for older generations. The same applies for equipment of a different Mobile Network Operator. Again, this is to avoid radio interference, but it is also one of the reasons why the proposal is laid out as it is and provides little opportunity for change .

The level of new equipment associated with the deployment of 5G is also rather significant. For example, three new antennas are required, and these are some 3 times as heavy as previous antennas creating new structural concerns for site-sharing on the same support poles. The Applicant has found a sustainable design solution which allows 5G and 4G technology to be pushed through the same antenna, reducing the volume of apparatus within the Conservation Area. In addition to this, Remote Radio Units now need to be placed as close to the antenna as possible for efficiency instead of typically being ground based. These have been sited in a location behind the antennas where they can be screened/backclothed. The cabinets have been grouped to the centre of the building, close to the rising plant room feature as a means of decreasing the overall visibility of equipment.

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The applicant would like to stress that the proposal is seen in the context of the Operator's license requirement and customer obligation to provide and maintain a continued network service. It is considered that the proposed height and therefore the associated visibility of the scheme does not outweigh the overall public benefit of the scheme.

The technical requirements of mobile communication operators are acknowledged in the National Planning Policy Framework which states that local planning authorities should support electronic communications networks and their provision, including telecommunications and high-speed broadband. The Applicant has successfully selected a feasible location in accordance with the sequential approach outlined within the NPPF.

The points argued thus far indicates that the proposal strikes a good balance between environmental impact and operational considerations. The proposed height and design of this installation represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements to provide high-quality and high-speed communication infrastructure essential for economic growth to improve a critical service as illustrated by the NPPF and the Local Plan.

Health and Safety - including ICNIRP compliance

ICNIRP 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.

The proposed installation conforms to current government planning guidelines regarding potential health effects arising from telecommunications development and the operator has included an ICNIRP certificate within the application pack.

Recent court cases have confirmed that the public perception of health risks can be a material consideration within the land-use planning system. The publication of the National Planning Policy continues to highlight the Governments view that the planning system is not the appropriate mechanism for determining health safeguards. It sends a clear message to local planning authorities stating that they must 'determine applications on planning grounds. This is reiterated in the Code of Practice.

Notably, Ofcom have now undertaken 5G audits in the major cities and the results indicate that the exposure levels are a small fraction of the limits. This further reinforces the PHE guidance in respect of 5G which states: "It is possible that there may be a small increase in overall exposure to radio waves when 5G is added to an existing network or in a new area. However, the overall exposure is expected to remain low relative to guidelines and, as such, there should be no consequences for public health." (https://www.gov.uk/government/publications/5g-technologies-radio-waves-and-health).

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3. 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 National Planning Policy Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.

In essence, the existing network is struggling to keep up with the demand for signal within London's City Centre area and customers are currently experiencing delays and poor user experience. A densification within the network is also required as part of rolling out 5G network, due to the shorter range. The dynamic nature of technological advances in the telecommunications industry coupled with ever-increasing demand from subscribers dictates a continual reinvestment programme on the part of the operators. As a result, and in line with their license requirements, mobile operators are constantly developing their networks including filling holes where there is currently a lack of service provision.

Radio engineers plan cellular networks using highly sophisticated computer programs that incorporate propagation models. Armed with data on cell site location, cell site configuration, maps, terrain, data usage etc. they are used to predict, with a high degree of confidence, the behaviour of cellular transmissions. This then enables the operator to calculate what improvements are needed to provide the level of coverage and capacity required by their customers.

In the early days of mobile communications, peripheral locations, high-level topographies and large-scale towers were often identified in order that transmission from a new base station could cover an expansive geographical area. However, whilst this approach was viable for early network generations, the number of mobile handset users has dramatically increased with time, as have the advancements in mobile technology itself. As a result, the cellular network construction and operational criteria have changed too. Because modern networks use higher frequencies with faster data rates whilst serving significantly increased numbers of mobile device users, typical network cell areas are now smaller in their geographical expanse and tend to be directly proportionate to the number of users within it. This makes it incredibly difficult to site proposals where absolutely no impact is created, but nevertheless, the Applicant believes that this is a worthy option.

4. 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)

If no alternative site options have been investigated, please explain why: This is not generally required for existing upgrades/site sharing proposals as the sequential search process has been followed and it is possible to upgrade an existing site, therefore the most appropriate option in terms of town planning policy and guidance is being followed. This is supported in appeal decision APP/X5210/A/13/2204258 where in paragraph 15 the inspector states '*The upgrade of the existing installation is seen as the most effective way of increasing signal capacity in the area. The CBP identifies an alternative site search is not generally required for the upgrade or alteration to an existing telecommunications site. This is supported by advice in the Framework which encourages the use of existing sites. In this regard, it is not necessary for the appellant to have considered alternative sites.*' In this appeal decision 'CBP' has been used to refer to the Code of Best Practice for Mobile Network Development in England. This is outlined in the principles and commitments section of the Code of Best Practice, paragraph 18. If the planning officer has any hesitations regarding alternative options, please contact the agent for further clarification.
Land use planning designations: Bloomsbury Conservation Area
Additional relevant information (include planning policy and material considerations): From the outset, it should be appreciated that irrespective of the proposed installation's use as a telecommunications apparatus, any change in form in the street scene will always be, to some degree, a noticeable alteration to those regular passers-by found closest. We have tried to best mitigate any direct changes in residential areas by locating the proposal on a commercial building, where views of the elevated rooftop are mostly intermittent and short ranging due to the intervening built environment. The proposal is not thought to be obtrusive within the street scene as the proposal is mostly removed from eye-level views and only noticeable when seeking its presence. Regular passersby should already be accustomed to the existing equipment and so the slight intensification of equipment should be unnoticeable for many. The proposal hopes to respect the statutory designation by maintaining a similar antenna height to what is already existing. It should also be recognised that visibility or a development's siting and appearance, does not automatically result in an overwhelming adverse harm. 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 policy is out of date, then the NPPF must prevail. The following information outlines the various planning guidance and policy that has been considered relevant to the subject application. It is not necessary to quote extensively from this document, but the following points are highlighted.

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National Planning Policy Framework

The governments National Planning Policy Framework (NPPF) sets out government's planning policies for England and how these are expected to be applied. Section 2 of the NPPF confirms that sustainable development is at the heart of the Framework.

Paragraph 8 states: '*Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways*

- *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;*
- *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*
- *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.'*

The installation will enable the operator to provide the required improvement to 4G and 5G services in the area, forming part of a network of high technology. These services allow home working and working on the move and can reduce the need to travel, thus contributing to the sustainability agenda.

The Government's latest thinking strongly supports communications infrastructure. Section 10 relates to 'Supporting high quality telecommunication'. Paragraph 119 of the framework document sets out the objectives of the communications Infrastructure. It states that '*advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being'. This is echoed by the Councils own Digital Communications objectives. Planning decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.*'

Paragraph 120 states '*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'.

Section 12 of the Framework relates to 'Achieving well-designed and beautiful places'.

Paragraph 131 states '*The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. 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. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process'*.

Public benefits are defined within the NPPG 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.

In order for the UK to benefit from the huge potential of 5G Local Planning Authorities will have to weigh the Public Benefits of such connectivity with the requirements to instruct and manage the built environment. Central Government understands that this may present concerns with the various design solutions proposed but it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. This is further emphasised within the Commission's sixth Annual Monitoring Report, which is now known as the Infrastructure Progress Review, in March 2023. It concluded that the government has ambitious goals for infrastructure, but in many areas, it is not delivering fast enough. It did acknowledge that digital 'Infrastructure is a key part of the solution'.

Code of Best Practice on Mobile Network Development in England (2022)

The Code of Best Practice has been fully revised in 2022 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2016).

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development.

The proposal will introduce new 5G services to the area. Notably, 5G also integrates the previous generations of mobile telephony through either utilising the existing radio spectrum

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and/or combining the advantages of previous generations and using multiple platforms to manage coverage and capacity. It is estimated that 5G will directly contribute to an additional £7 Billion a year to the UK economy in just six years from roll-out. Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas and ancillary equipment will be needed. But to do so the network needs to be surveyed, designed and planning approval obtained. It has been acknowledged by Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks.

The Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that there remains a reliance on radio masts to provide the main umbrella of coverage. Typically, radio signals operate like light and must "see" over the target coverage area, they cannot be hidden and so there will always be a degree of visual impact.

It is commonly known within the industry that there is a need to continually upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely. This is confirmed within the Code of Best Practice on Mobile Network Development in England which acknowledges '*4G and 5G are likely to require further network densification in order to meet growing customer demand for data*' as well as improved coverage and capacity, together with ambitious Government aspirations.

The Code goes on to acknowledge that operators maximise the use of their existing network infrastructure for the provision of 5G services and are similarly upgrading their 4G network infrastructure to improve capacity and coverage. However, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity need to be enhanced in line with Government commitments and customer demand.

It implies that consumers, businesses and public bodies are increasingly relying on mobile communications and expect to receive a signal wherever they are. The Code indicates that recent changes in planning policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed.

The proposed development is well designed. Moreover, the installation will enable access to new services in the wider public good which supports ways of working which deliver wider planning, sustainability and quality of life benefits, is therefore in complete compliance with the Code of Best Practice.

The London Plan

The London Plan is a strategic planning document that sets out an integrated framework for the development of London. It is prepared by the Mayor of London and provides a long-term

vision and policies for land use, transport, housing, economy, environment, and social infrastructure within the city.

The London Plan guides the spatial development of the city, taking into account factors such as population growth, housing needs, transportation requirements, and environmental sustainability. It aims to shape the city's physical and social fabric, promoting economic growth, social inclusion, and quality of life for Londoners.

The plan covers various aspects of urban development, including:

Transport: It outlines policies to improve transportation networks, reduce congestion, and promote sustainable modes of transport, such as walking, cycling, and public transport. It also emphasizes the integration of transport with land use planning.

Economy: The plan supports economic growth by identifying areas for business development, encouraging innovation and entrepreneurship, and protecting employment land.

Environment: It promotes environmental sustainability by addressing climate change, promoting energy efficiency, protecting green spaces, and enhancing biodiversity.

Social infrastructure: The plan considers the provision of social infrastructure, such as schools, healthcare facilities, cultural amenities, and community spaces, to support the needs of London's residents.

The London Plan is periodically updated to reflect changing circumstances and priorities. It serves as a guide for local boroughs in their own planning decisions and provides a framework for developers, investors, and communities to understand the city's development goals and policies.

The proposed development will help promote the London Plan by enhancing connectivity, supporting sustainable development, enabling smart city infrastructure, and fostering economic growth, aligning with the plan's objectives of creating a connected, sustainable, and prosperous city.

The UK Wireless Infrastructure Strategy

The UK Wireless Infrastructure Strategy is a new policy framework to drive deployment and adoption of 5G and advanced wireless connectivity; and the government's 6G strategy for the UK.

It highlights the importance of connectivity to the UK and recognises that the UK needs world-class wireless connectivity:

> *"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*

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the world once more. 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."

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 power of 5G and future telecoms advances will unlock new solutions in everything from industry to healthcare. Falling behind in coverage will mean falling behind in international competitiveness when it comes to the technologies of tomorrow, and failing to provide British people with innovative, life-enhancing services on secure, resilient networks."

The proposed telecommunication equipment will help promote The UK Wireless Infrastructure Strategy by improving coverage and capacity, supporting digital inclusion, facilitating economic growth, and enabling future-proof infrastructure including 5G that will ensure the area doesn't fall behind in coverage and international competitiveness. The proposed development will provide significant public benefit with greater capacity and wireless connectivity for local businesses, residents and visitors to the area.

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise".

Camden Council does not have a specific telecoms policy, although para. 5.10 of the Local Plan is relevant. This, together with the NPPF is of relevance. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with the NPPF. Para. **5.10** reads:

Digital infrastructure

"The Council recognises the importance of digital infrastructure in enterprise development and expects electronic communication networks, including telecommunications and high-speed broadband, to be provided in business premises."

Policy **D2** reads:

Heritage

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

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

a. the nature of the heritage asset prevents all reasonable uses of the site;
b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
d. the harm or loss is outweighed by the benefit of bringing the site back into use.

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

The public benefit associated with improving digital connectivity within such a densely populated area is considered to outweigh the perceived harm to marginally increasing the volume of equipment on the building. The Operator has strategically utilised a new technical advancement which allows 4G and 5G technology to be pushed through the same antenna. This has significantly reduced the volume of equipment that is required, which is an essential design measure to minimise the visual impact associated with deploying infrastructure within a Conservation Area.

"Conservation areas

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.

The Council will:

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

The proposed development at this site is required to deliver the requisite level of electronic communication service on a single site that is to be adapted to accommodate multiple users (so enable future site sharing opportunities), yet seeks to minimise its visual impact or change to the character of this location (the site remaining as physically distant from residential lines of sight / set against the existing equipment and elevated plant rooms). The form and design of the proposed configuration would not appear out of context in this location (appearing in the comparable context of the existing roof top infrastructure / ladders etc.), so according with wider Development Plan policy and would ensure the integrity, character and setting of the area is fully maintained.

The public benefits of a greatly enhanced communications network for businesses, residents and visitors alike in this location would qualify as a substantial benefit with near benign change or impact on amenity. Any harm to the character and setting of the wider heritage asset would qualify as less than substantial, and the public benefits would be considerable, and materially outweigh harm.

The enhanced digital service would very much accord with the objectives of the Development Plan policy.

The proposed installation fully accords with the requirements of the NPPF providing reliable communications infrastructure to ensure continued economic growth and social well-being. The proposed location of the equipment on a rooftop minimalizes visual intrusion. Mirroring the height of the existing rooftop furniture also minimalizes visual intrusion and further promotes the NPPF. The benefits of the proposed development will significantly outweigh any perceived potential harm.

Camden Planning Guidance (CPG)

As previously outlined. the Camden Planning Guidance (CPG) document for telecommunications, adopted on 26 March 2018, provides detailed advice on the siting and design of telecommunications infrastructure in the borough. Key considerations include siting and designing telecommunications equipment to minimise its visual impact on the surrounding area, where possible, utilising existing buildings or structures to reduce the need for new masts or towers and avoiding sensitive areas i.e. areas with high residential density or within areas of conservational value. The Applicant would like to reiterate that this type of infrastructure is heavily dependant on specific factors, including the requirement to be within

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close proximity to the where the demand is highest. 5G technology has much shorter cell areas, as a direct consequence of utilising higher radio frequencies, which greatly limits the Applicants siting opportunities. To ensure the development is as sensitive as it can possibly be, within the technical constraints, the Applicant has proposed a site sharing proposal and limited the volume of equipment to what is absolutely necessary. The document continues to advise that the design and colour of equipment should be sympathetic to the local context and surroundings, which the Applicant believes will match what is already existing and once accepted by the Council. This should help to minimise the visual change associated with the introduction of slightly more equipment, necessary for a new Mobile Network Operator to provide service provision. The Applicant considers that the proposal has followed the guidance within this document, as well as the requirements of local and national policy.

The proposed works on this site would not be to the visual detriment of the surrounding area and would not result in demonstrable harm to the character of the area, but they are necessary to ensure improved delivery of service. Whilst any development will have an impact, this proposal will provide a demonstrable benefit to the area, which would respect and continue to maintain the appearance of the area whilst being a suitable distance from potentially sensitive users.

The Applicant is of the impression that this proposal complies wholly with the relevant policies. As part of this assessment, the Applicant has explained, in great detail the specific siting and design measures that are specifically aimed at reducing the visual impact for sensitive receptors. When taking a collective approach, it is thought that this location maximises, as far as practically possible upon the intentional siting and design measures, whilst ensuring that the specific operational needs are met.

It is thought to be extremely unreasonable to expect such niche infrastructural developments (whose form is dictated by strict operational requirements) to adhere to more general policy criteria. The structure itself cannot physically enhance the area, but it has been reduced as far as practically possible and the public benefit that it will provide is believed to outweigh any visual impact which, in itself, provides good placemaking opportunities. The Applicant believes that it is as respectful as practically possible, within the limits of the operational requirements.

Planning Assessment

The main issues arising from this planning application are whether the proposed scheme due to its scale and siting would be a visually obtrusive feature which would be detrimental to the character and appearance of the area. Additionally, whether any 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 in the NPPF, which fully supports the roll out of 5G and the next generation connectivity to accelerate business opportunities and growth to ensure the economy is resilient and competitive, along with the relevant planning policies in NPPF and the relevant Local Plan policies.

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Irrespective of the installation's use as a telecommunications base station, the introduction of a new structure will always be, to some degree, a noticeable addition to regular passers-by and residents found closest when seeking out its presence. However, it should be recognised that visibility does not automatically equate to an overwhelming adverse harm occurring nor is there a right to a view. Therefore, just because the base station will be seen and is different to an existing structure that people have become accustomed to, then this should not automatically equate to the mast being unacceptable. A balanced assessment should be made when considering all material planning considerations, most notably there should be an appreciation of what is achievable within the scope of telecommunication infrastructure that has ultimately influenced the scheme's siting and appearance.

The Applicant contends that when assessing the impact of the subject proposal, there needs to be reasonable consideration about where and in what context views of the development will be afforded; just because a development is generally visible, it does not necessarily equate to a significant detrimental impact.

Planning is carried out in the public interest, and it is only when private and public interests coincide can a view to a third party's land become a material planning consideration. As with views over any adjoining land, that the proposal may be visible from nearby properties does not equate with harm and cannot normally be regarded as a material planning consideration. It is only when the visual impact of adjoining development, in this case the proposed radio base station, from a principal living room of a nearby property becomes overbearing can it be considered as a material consideration. It is at this point that public and private interests will coincide. In situations where views of the proposed development when seen from the principal living room windows of an adjoining property will appear oppressive, for example, when there is serious overshadowing, loss of daylight and sunlight, or proximity of long lengths of two-storey blank flank wall along the common boundary between two properties, it will become a material consideration.

This is certainly not the case at the application site. The view of a communications structure on the elevated rooftop cannot be said to be in any way overbearing or inappropriate and could therefore not be a material planning issue in the determination of this application for planning permission.

The proposed works are not to the visual detriment of the surrounding area, being suitably distant from sensitive receptors and respectful of the key attributes of the conservation area. From an operational perspective, antennas must 'see' the area they are providing service to, otherwise they cannot send a signal, and they cannot work. This is reflected in the height requirement of the equipment. Further to this, each element of this proposal has been limited to an operational minimum in terms of size and amount.

The apparatus should not appear significantly obtrusive from surrounding viewpoints and in relation to the overall context, i.e. the existing vertical street furniture; the size of the surrounding natural and built environment; its neighbours; the distances involved; and the presence of both intervening and wider panoramic features must be taken into account.

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One will note the variety in size, scale, age and architecture of the buildings present and the amount and variety of infrastructural features that exist.

The applicant has suggested the installation of light grey antennas to achieve the least contrast when viewed against the built environment and commonly grey sky, thereby minimising its visual impact and the context in which it will be seen. The applicant is however open to discuss colour options should the LPA wish to do so.

The proposal is not considered to result in demonstrable harm to the character of the immediate or wider area but are vitally necessary to ensure improved delivery of service. The proposal would respect and continue to maintain the character of the area, would be suitably distant from potentially sensitive users, and so would accord with the principles of the relevant Development Plan policies. It fully accords with the requirements of the NPPF.

Economic and Social Benefits

The NPPF strongly supports sustainable development, as does the local development 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 and the Local Development Plan to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

Providing the latest digital infrastructure to enable improvements in digital technology empowers and enables residents to have the highest quality of life, supports the creation of high-quality jobs and achieves the maximum productivity levels. It also helps the economy to be resilient and competitive. This is in full accordance with the ambitions of Camden Local Plan. It will help this part of London become an area where its businesses, public service providers and citizens are using digital technology by default and to the fullest to grow their businesses and improve productivity to access skills, training and employment opportunities to address global challenges that have a local impact such as ill health, social isolation, and pollution; to improve living standards and well-being, helping people to lead prosperous and rewarding lives; and to improve the quality and value for money of public services.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Enhancing the 2G, 3G and 4G coverage and capacity in this area and enabling future 5G services will fully meet this national policy objective.

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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). Numbers of this scale cannot be underestimated. 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 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.

It can revolutionise the retail industry by creating new experiences which is particularly relevant for the small businesses nearby; augmented reality will enable customers to try before they buy, it can create highly personalised shopping experiences by introducing LED screens, mood flooring, and magic mirrors for a fully interactive experience. A study by Grand View Research found that 5G powered Internet of Things hardware in retail environments is set to grow to more than $94bn by 2025. It can also create safer and more efficient shops as the low latency of 5G technology means there will be no waiting time and will enable widescale and efficient rollout of automatic scan and checkout and contactless payments. Amazon's contactless Amazon Fresh stores in London are already using this technology, allowing shoppers to use Just Walk Out Technology which automatically detects when products are taken from or returned to the shelves and keeps track of them in a virtual basket.

Health Benefits

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.

Bristol harbour installed thermal cameras specifically designed to alert the authorities when people fall into the water. The technology was implemented after ten people tragically died

in drowning accidents in the city in one year alone. The thermal cameras pick up when a person breaks a virtual barrier at the harbour edge - the council control centre is notified via 5G technology, and the local fire and rescue is subsequently called out if required. The lives of two people have already been saved by the technology. It can also create a better organised service where ambulance crew can instantly transmit life-saving details about a patient's condition to awaiting emergency departments. Information, from ultrasound images to blood pressure readings, and from heart rate to body temperature, can be sent to doctors ahead of an ambulance patient's arrival. This technology is not hypothetical – 02 and Vodafone began trialling 5G "smart ambulances" in the East of England and Milan.

Furthermore, the Future Communications Challenge Group has estimated that the economic impact of 5G on the UK could be around £112bn in 2020 per annum, rising to £164bn in 2030. In other words, about £2,500 per head of population. Numbers of this scale cannot be underestimated.

Conclusion

In conclusion, material planning weight should be given to constraints of the search area that has resulted in the pursuit of this scheme. Moreover, weight should be assigned to the need and the delivery of enhanced network coverage in fulfilling the operator's technical requirements in this part of London. In this respect the proposal is in accordance with the relevant planning policies and when taking a balanced assessment, any foreseen harm will be less than substantial and outweighed by the social and economic benefits the development will bring to the area.

Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 126) of the National Planning Policy Framework. 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."*

The applicant acknowledges that the local environment is unique, contributed to by the associated land uses, however, it should also be appreciated that each generation should therefore shape and sustain the built environment in ways that allow people to use, enjoy and benefit from it, without compromising the ability of future generations to do the same. Change in the built environment is inevitable, caused by natural responses to social, economic, and technological change. There should be a clear distinction between 'harm' and 'visibility'. Just because something is visible, does not necessarily infer that it is inappropriate to the street scene, or will lead to 'harm'.

Without this proposed site, network coverage for VMO2 in this area prevents the customers for the leading network operator from accessing their mobile devices contrary to the operators' license agreement and purposes in which the consumers purchased their mobile handsets, as well as being contrary to the guidance set out in NPPF. It will also be contrary to the aspirations of Camden Council, tasked with supporting the delivery of improved digital connectivity by the Department of Digital, Culture, Media and Sports (DCMS).

The scheme design is of a high standard and will not detract significantly from the existing visual and environmental character of the area. The benefits to residents and visitors by maintaining coverage to the area far outweigh any potential perceived negative impacts. In all these circumstances it is concluded that there is no policy or other objections that would warrant the refusal of planning permission and accordingly permission should be granted for the proposed development.

Confirmation that submitted drawings have been checked for accuracy

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