STATEMENT IN SUPPORT
OF
AN APPLICATION FOR A PRIOR APPROVAL DETERMINATION FOR
FOR DEVELOPMENT AT HAMPSTEAD TELEPHONE EXCHANGE, FINCHLEY ROAD, CAMDEN, LONDON NW3 6EX

AUGUST 2015

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REF: NW103

EXECUTIVE SUMMARY

The Proposed Development

This application is for the installation of electronic communications apparatus at Hampstead Telephone Exchange that forms part of Arqiva's new smart water metering radio network for Thames Water.

The Benefits of the Smart Water Metering radio network

Smart water meters are at the centre of Thames Water's overall 25 year plan, which was approved by the Secretary of State for Environment in June 2012. This aligns with the wider Government programme to roll out across Great Britain between 2014 and 2020, a dedicated smart metering network for electricity and gas meters to homes and small businesses.

Major benefits of the network will be:

- More efficient operation: with faster leak detection and repair; better fault finding; greater network visibility; enhanced supply/demand planning; and better capital investment/maintenance targeting
- Better customer service: providing customers with clear, detailed information on their water usage and consumption patterns, enabling them to adjust their behaviour to save water, energy and money
- Environmental protection: lower consumption and reduced leakage enable reduced abstraction; this in turn cuts carbon emissions from water treatment and distribution processes
- Improved water resilience: reduced danger of demand outstripping supply
- Platform for more frequent and better quality engagement with Thames Water customers on water efficiency offers, bespoke advice and tools for reducing consumption and bills – both water and energy – benefiting water and fuel poverty agendas.

To meet the requirements of the new smart water radio network, Arqiva will need to install electronic communications apparatus at several sites across London. The radio network will be based around long wave radio, which is essentially the same as the network being deployed by Arqiva in parts of Northern England and Scotland as part of the wider smart metering radio network for gas and electricity companies.

Technical and Operational Constraints

The smart water metering radio network for Thames Water, like all electronic communications networks, will need to be supported by an infrastructure of operational sites with the required antennas and other apparatus needed to provide radio coverage to the local area.

As the network must be able to communicate with meters that are typically found in a boundary box buried in the ground at a property or in the footpath, then the sites must be located so that they can provide an acceptable level of coverage to the properties that they serve.

Site Selection

It is proposed to install the smart metering equipment on the roof of Hampstead Telephone Exchange, a long-established telecommunications site already host to equipment operated by the Mobile Network Operators Telefónica UK Ltd (the brand O2) and EE (Orange and T-Mobile) as part of their networks and services in the Hampstead and West Hampstead areas of London. The proposed siting of the development therefore accords with best practice in terms of the shared use of existing telecommunications sites.

Compliance with Planning Policy and other Material Planning Considerations

Policy at national level is set out in the NPPF. Section 5 of the NPPF views high quality communications infrastructure and systems, such as the coverage provided by the smart meter water network, as essential for achieving sustainable development objectives. Smart metering will also help deliver the aspirations set out in Section 10 of the National Planning Policy Framework.

The Development Plan comprises the Camden Core Strategy 2010-2015, adopted in 2010, the Camden Development Policies 201-2025, and those saved policies of the Camden Unitary Development Plan that remain in force. None of remaining saved UDP policies or any of the policies in the core strategy and development policies document relate specifically to electronic communications development, although the shared use of this existing telecommunications sites is entirely in accordance with section 5 of the NPPF.

The proposal and its role in Thames Water's smart metering network will also help to deliver the Council's aspirations to support sustainable development, provide Camden's population with support and infrastructure services, and tackle climate change, as set out in policies CS5 'Managing impact of growth', CS10 'Support community facilities and services' and CS13 'Tackling climate change' of the Core Strategy.

With regards to design, layout and scale, this has been guided by the special technical and operational requirements that are associated with electronic communications development. Good practice guidance requires careful consideration of the siting and design to minimise appearance and to ameliorate potential visual impact, objectives achieved by the proposed development in accordance with policy CS14 'Providing high quality places and conserving our heritage' of the Core Strategy. This position applies equally to policies DP24 'securing high quality design' and DP25 'Conserving Camden's heritage' of the Camden Development Plan Policies document.

ICNIRP Compliance

The proposed antennas comply with all relevant health and safety requirements, in accordance with ICNIRP guidelines. A certificate of compliance has been provided with this application.

Servicing and Maintenance

The site will require periodic access for maintenance and servicing visits, which will be restricted to authorised personnel only. Access to the application site will use either of the existing entrance to the telephone exchange from Finchley Road and thereafter use

the established internal and external access routes to mid and upper roof levels. The means of access to the site and roof level do not require any alteration as part of the development proposed.

Summary

In conclusion, the proposed development has been sited and designed in order to locate the development as sensitively as practicable. Specific consideration has been given to technical requirements and national and local planning policy. The proposal is supported by both local and national planning policy, and as such it is considered that the application should be looked upon favourably.

1. INTRODUCTION

1.1 This statement is submitted in support of an application for planning permission to install an electronic communications base station at Hampstead Telephone Exchange as part of Arqiva's planned smart water metering communications network for Thames Water.

1.2 Arqiva is a designated Electronic Communications Code Network Operator and has been appointed by Thames Water to develop the smart water meter infrastructure network in London.

1.3 The proposed base station is shown in detail in the drawings submitted. In summary, it involves the installation of the following electronic communications apparatus:

- A 2.7m long Omni antenna attached to an existing support pole at upper roof level at a base height of 32.7m above ground level
- The removal of a redundant equipment cabinet at mid-roof level
- The installation of a replacement equipment cabinet with attached GPS antenna at mid-roof level. The equipment cabinet has dimensions of 1800mm x 1515mm x 707mm
- Ancillary development such as cables and cable trays linking the antenna to the apparatus within the equipment cabinet.

1.4 In this statement, which includes a summary of the design and access considerations affecting the design and layout of the base station, we go on to highlight the purposes and benefits of the development proposed, to explain the particular need in this case and to demonstrate compliance with planning policy. We also provide information on health and safety and related issues by way of further reassurance.

2. THE PURPOSE AND BENEFITS OF THE SMART WATER METER NETWORK

2.1 Thames Water is installing smart water meters progressively across London to reduce overall water usage and improve leakage detection. In an average year London gets less rain than many may think – receiving less than Rome, Istanbul, and Dallas, and only half as much as Sydney. London is designated by the Environment Agency as a 'seriously water stressed area' and has one of the highest levels of per capita water consumption in the UK.

2.2 This puts huge strain on resources and causes environmental problems for local rivers and wildlife. During very dry periods demand for water in London already exceeds what is available and this shortfall will increase as the population grows and our climate changes.

2.3 This is why rolling out water meters is at the centre of Thames Water's overall 25 year plan, which was approved by the Secretary of State for Environment in June 2012. This initiative has the support of the Mayor of London in his 'Vision for London' statement and from major environmental groups in the Blueprint for Water Coalition. Smart water metering will also help deliver the aspirations set out in Section 10 of the National Planning Policy Framework and help meet the water use and supplies policy framework within The London Plan.

2.4 Thames Water intends to progressively meter all domestic and business premises across their supply area. Within this, Thames Water expects to be able to provide almost all businesses and around three quarters of households with individual meters by 2030.

2.5 Thames Water will be the first UK water company to install smart water meters which provide automated collection of data, via telemetry. This technology provides a clear picture of leakage and wastage at customers' properties, and a detailed understanding of water use on the network so Thames Water can more effectively target mains replacement work.

2.6 Smart water meters will also put all customers in control of their water bills, gradually replacing the existing fixed charges based on outdated rateable values. Smart meters will also enable customers to view their consumption online, and we know that Thames Water customers who already have standard water meters tend to have lower bills and use, on average, 12% less water.

2.7 Major benefits of the network will be:

- More efficient operation: with faster leak detection and repair; better fault finding; greater network visibility; enhanced supply/demand planning; and better capital investment/maintenance targeting.

- Better customer service: providing customers with clear, detailed information on their water usage and consumption patterns, enabling them to adjust their behaviour to save water, energy and money.

- Environmental protection: lower consumption and reduced leakage enable reduced abstraction; this in turn cuts carbon emissions from water treatment and distribution processes.

- Improved water resilience: reduced danger of demand outstripping supply.

- Platform for more frequent and better quality engagement with Thames Water customers on water efficiency offers, bespoke advice and tools for reducing consumption and bills – both water and energy – benefiting water and fuel poverty agendas.

2.8 Having regard to the Government's three key dimensions for sustainable development within the NPPF, smart water metering will in particular assist in the following ways:

- **An economic role –** smart water metering communications will help Thames Water to improve network efficiency and resilience and better capital investment/maintenance targeting; reducing the dangers of

demand outstripping supply which might stifle business growth; allow businesses to be water conscious, smarter and invest in more water efficient infrastructure to reduce longer term running costs; consequential spin offs will, among many, be the creation of new green jobs and technologies, modern and water efficient industries and help stimulate retail sales in more efficient appliances that better utilise water.

- **A social role -** modern smart metering communications will allow consumers to benefit from real time information on their water usage and consumption, to help them control everyday use and save money. With greater visibility and understanding of their water consumption, consumers will be able to make more informed choices, such as using eco wash modes on washing appliances, whether to take a bath or shower and whether to water a garden or wash a car.

- **An environmental role –** smart metering communications will help to reduce water consumption at homes and premises and allow smarter working practices such as better water management within larger businesses and incorporation of new efficient infrastructure into new developments. In this way modern smart water metering communications will help ensure the prudent use of water resources, alleviate waste, reduce water abstraction and help the UK Government meet its sustainable economy aspirations.

2.9 However, in order to make this important contribution to sustainable development objectives, the smart water metering radio network has to be developed first and like all electronic communications networks, will need to be supported by an infrastructure of operational sites. This is no different than railway services, for example, being reliant on the associated infrastructure of lines and stations. In the next section, the particular network requirement from which this application stems is explained.

2.10 To meet the requirements of the new smart water radio network, Arqiva will need to install electronic communications apparatus at several sites across London.

The radio network will be based around long wave radio, same as that being deployed by Arqiva in parts of Northern England and Scotland as part of the wider smart metering radio network for gas and electricity companies.

3. THE REQUIREMENT

3.1 Arqiva owns and operates the terrestrial radio and television broadcast networks. The company owns most of the tower portfolio originally developed by T-Mobile (now part of EE) and has rights to manage other masts, towers and rooftops, developed or otherwise suitable for use for electronic communications. In total, Arqiva has access to over 16,000 sites around the UK, which is considerably in excess of the numbers available to any other electronic communications operator in the UK. Arqiva is also licensed to use the 412-414MHz spectrum that will be used as part of the smart water metering radio network, the same as that being deployed within Northern England and Scotland as part of the Government's wider smart metering programme for the gas and electricity companies.

3.2. Basing the smart water metering radio network on this portfolio of existing sites will be a critical element in minimising the potential visual impact associated with the deployment of a new network. This is obviously consistent with longstanding statutory and government policy requirements to use existing sites or other high structures so as to minimise visual impact.

3.3 As the network must be able to communicate with meters that are typically found in a boundary box buried in the ground at a property or in the footpath, then the sites must be in located so that they can provide an acceptable level of coverage to the properties that they serve.

3.4 New installations will be required in some areas for a variety of reasons relating to coverage requirements, for example, the nearest existing sites are too far from certain properties; the signal from the nearest site may be adversely attenuated or affected by topography or natural or man-made features such as trees or high buildings; or the ground conditions and construction mean that the signals will be unable to penetrate them. Without some new installations a number of homes and businesses would not therefore be able to benefit from smart water meters.

3.5 In the current case coverage issues exist in the wider vicinity of the application site and hence a new installation is proposed to address this. In addition to network coverage to the local area, the proposed base station has to fit in with the overall plan for the network around Arqiva's existing sites or other sites. To help illustrate the context of this application, two radio simulation plots are provided in Annex A to this statement:

- The first plot shows planned network coverage without the base station at Hampstead Telephone Exchange. The location of planned sites is shown by a symbol and their reference number, e.g. the application site is THW_NW103 with adjoining sites identified in similar terms, and coverage from each location is illustrated by coloured shading. As can be seen, there will be a hole in network coverage in this part of London without the proposed base station

- The second plot shows cumulative planned network coverage with the proposed base station at Hampstead Telephone Exchange. As can be seen, the proposed base station provides coverage across Hampstead and West Hampstead and beyond

3.6 It should be noted that these radio simulation plots relate to a planned network that is in its infancy and hence they may tend to exaggerate or underplay true levels of coverage on the ground, largely because the modelling only takes into broad account general topography and man-made features. They are, however, a useful tool for explaining how the new installation will fit into the network in the wider area.

3.7 Our conclusion is that the development proposed site strikes the best balance between environmental and operational considerations, including the key requirement for the development to be close to the properties it is intended to serve. This is the reason for the application before you.

4. COMPLIANCE WITH PLANNING POLICY

4.1 The relevant planning policy framework that has been taken into account and in part already alluded to is found principally within:

- The Development Plan, which comprises the Camden Core Strategy 2010-2015, the Camden Development Policies 201-2025, and those saved policies of the Camden Unitary Development Plan remaining in force
- National Planning Policy Framework (NPPF)
- The Redington/Frognal Conservation Area Statement, adopted January 2003

4.2 These documents provide the overall policy background for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development.

The National Planning Policy Context

4.3 The general policy context can be summarised as follows:

- Government policy within the NPPF is to support high quality communications infrastructure and systems – this is especially relevant to smart metering, which is a Government initiative
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to a minimum
- The best way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites
- The starting point for planning new networks or the expansion of existing networks is, therefore, to use existing electronic communications sites

- Where new installations are required, as in this case, operators should look to develop innovatively designed structures, such as those designed to blend in with the street scene

4.4 The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, new important infrastructure such as the smart water metering communications network for Thames Water.

4.5 The importance of the proposed development as part of the smart water metering network is clearly a key material planning consideration as it is precisely the type of new digital infrastructure that the NPPF is seeking to support. Hence, it is important to reflect on some key points within the NPPF which are relevant to the very important development at this site and the general planning principles that should apply when determining the merits of the application:

a. Paragraph 14 advises that authorities should:

   - positively seek opportunities to meet the development needs of their area [as part of plan making];

   - meet objectively assessed needs unless the adverse effects would *"significantly and demonstrably outweigh the benefits"* ;

b. Paragraph 17 advises that planning should *"proactively drive and support sustainable development to deliver the homes, businesses and industrial units,* ***infrastructure*** *and thriving local places that the country needs"* [my emphasis]*;*

c. Paragraph 187, on "decision-taking" states that authorities should *"look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible"*.

4.6 Paragraph 14 of the NPPF further states that the presumption in favour of sustainable development lies at the heart of the planning system and, in respect of decision-taking, this means that development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully will all relevant Development Plan and NPPF policies and, therefore, permission should be granted for the development.

Section 5 - Supporting Advanced Communications Infrastructure of the NPPF

4.7 The proposal is supported by, and accords with, the guidance in Section 5 of the NPPF, which provides further guidance on the Government's objective of providing high quality communications networks in England.

4.8 The NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this has to include an understanding of the associated special problems and technical needs of developing communications networks such as the smart water metering radio communications network.

Section 7 – Requiring Good Design of the NPPF

4.9 Government places great importance on the design of the built environment and paragraph 56 of the NPPF states that this is an integral objective of achieving sustainable development. The careful approach taken to the design and siting of the proposed development complies fully with this general policy objective.

4.10 More specifically, the proposal is supported by the guidance in paragraph 65 of the NPPF, which states that:

'Local Planning Authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).'

4.11 In respect of this guidance, all reasonable steps have been taken through careful siting and design to minimise the visual impact of the development, so far as the technical and operation constraints allow. The proposal is an acceptable design solution that will not have any impact on any designated heritage asset.

Section 10 – Meeting the challenge of climate change, flooding and coastal change

4.12 Government seeks local planning authorities to properly consider the issue of climate change and to support necessary infrastructure central to the economic, social and environmental dimensions of sustainable development. Paragraph 94 encourages local planning authorities to have *"proactive strategies to mitigate and adapt to climate change*" taking full account of matters such as water supply and demand considerations. This will clearly include the necessary smart water metering radio communications infrastructure for Thames Water to tackle water use and demand.

London Plan Policies

4.13 Policy 5.15 of The London Plan 2013 specifically tackles water consumption and supply and how this might be met in a sustainable manner by, inter alia, minimising the use of mains water and reducing leakage levels. A significant objective of the policy is to encourage the maintenance and upgrade of water supply infrastructure and the smart water metering network and smart meters will be an essential contributor to this objective.

Camden Core Strategy and Camden Development Policies

4.14 The policies map of the Camden Core Strategy designates the application site as falling within the defined metropolitan area and shows that is located outside of the extensive Redington/Frognal Conservation Area that covers land on the opposite side of A41 Finchley Road. The application site is not affected by any other specific designations or land allocations that need to be taken into account in addition to planning policies relating to electronic communications and ensuring sustainable water use and supply.

4.15 In relation to other relevant policies, the proposal and its role in Thames Water's smart water metering network will help to deliver the Council's aspirations to support sustainable development, provide Camden's population with support and infrastructure services, and tackle climate change as set out in policies CS5 'Managing impact of growth', CS10 'Support community facilities and services' and CS13 'Tackling climate change' of the Core Strategy.

4.16 The closest heritage assets to the application site are the Redington/Frognal Conservation Area, which covers the predominantly residential streets on the opposite (eastern) side of the A41 Finchley Road, and the following buildings in the National Heritage List for England:

- The Camden Arts Centre and attached Gates and Piers, Arkwright Road, (Grade II, list entry 1244685), which is approximately 85m to the southeast of the telephone exchange

- No.28 and attached boundary walls and piers, Arkwright Road (Grade II, list entry 1244684), which is approximately 280m to the east of the application site

- The Presbyterian Church of St Andrew, Finchley Road (Grade II, list entry 1078346), which is approximately 300m to the northwest of the application site

4.17 The Redington/Frognal Conservation Area Statement make no specific reference to the telephone exchange, which is probably to be expected given its location on the western side of Finchley Road. It is nevertheless relevant to establish this position, as at least some of the existing electronic communications apparatus at roof level would have been in situ at the time the statement was written, indicating that this development was not considered to have any significant impact on the setting of the conservation area and views into and out of it.

4.18 It must also have been the case that the Council has previously determined that the existing electronic communication apparatus on the building would not have any significant impact on the setting of the three listed buildings referred to previously, or the setting of the conservation area, when considering proposals for the installation of this equipment. In our view, this position will remain unchanged by the development proposed and hence it will not have any material impact on these heritage assets.

4.19 We are however conscious that the installation of additional electronic communications apparatus on the telephone exchange has the potential to be visible from some public views and have sought to mitigate and minimise this by the following means:

- By replacing a redundant equipment cabinet at mid-roof level

- Using a pole-mounted 2.7m long ‘whip like’ Omni antenna rather than alternative designs such as antennas installed on a mast, or three directional pole-mounted panel antennas, to provide the required level of 360° network coverage

- Attaching the pole-mounted Omni antenna to an existing pole-mount at upper roof level where it will be seen in context with similar items of electronic communications apparatus and will not, therefore, appear as an incongruous or jarring addition to the building

4.20 With regards to design, layout and scale, this has been guided by the special technical and operational requirements that are associated with electronic communications development. The critical technical requirement here is that the 2.7m long Omni antenna needs to be installed on a pole-mount to achieve the required level of horizontal separation from the existing antennas and thereby prevent radio interference between the antenna systems that would otherwise occur. The position of the antenna reflects the minimum height required to achieve this key technical constraint.

4.21 Good practice guidance requires careful consideration of the siting and design to minimise appearance and to ameliorate potential visual impact, objectives achieved by the proposed development in accordance with policy CS14 'Providing high quality places and conserving our heritage' of the Camden Core Strategy. This position applies equally to policies DP24 'securing high quality design' and DP25 'Conserving Camden's heritage' of the Camden Development Plan Policies document.

4.22 In the light of the above, the proposed development is in accordance with all relevant national and local planning policies.

5. DESIGN AND ACCESS CONSIDERATIONS

5.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. However, to assist your determination this section provides a description of the process adopted in the design of the proposals and explains the access considerations. The significant contribution such development makes towards sustainable development objectives has already been outlined earlier.

Physical Context

5.2 The application site comprises part of the roof of Hampstead Telephone Exchange, an unlisted five-storey building located on the western side of the A41 Finchley Road between the intersection of Lymington Road and Langland Gardens. The site is not located within a conservation area, although the extensive Redington/Frognal Conservation Area covers land and property on the eastern side of Finchley Road. Land uses in the vicinity of the application site are predominantly residential, including the adjoining 7 storey flats at nos. 353-359 Finchley Road/Montgomery Court.

5.3 The telephone exchange is a long-established telecommunications site, which is already host to a range of electronic communications apparatus at mid and upper roof levels, including pole-mounted antennas, dishes, and a recently redundant equipment cabinet. This redundant equipment cabinet will be removed as part of the proposed development.

5.4 A combination of perspective, the height of the telephone exchange building, and other built development nearby, means that the majority of the equipment installed on the roof of the telephone exchange is not dominant in views from public vantage points nearby. The installation of the proposed Omni antenna at upper roof level, which needs to be elevated above the existing antennas in order to avoid radio interference, may be visible in some views. However, visibility

does not equate to visual harm. Any impact will be mitigated by its height above ground level and the context provided by apparatus of similar design and profile against which it will be seen.

Amount, Design, Layout and Scale of the Development

5.5 The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide an acceptable level of coverage to the local area, having regard to the need to minimise visual impact, which have been explained in the previous sections of this statement.

5.6 In addition, the proposed siting of the base station meets the following critically important technical and operational requirements:

- It is close enough to the residential and other properties that will receive coverage from the site (see the submitted radio plots)
- The antenna has to be installed at a specific location and height to meet the coverage requirements
- The antenna has to be installed to ensure compliance with ICNIRP guidelines. These guidelines provide protection to the general public and for occupational purposes
- The antenna has to be positioned to avoid radio interference with any of the existing equipment already installed on the building. In this case, this means vertical separation between the proposed Omni antenna and the Mobile Network Operators antennas installed at upper roof level
- All apparatus has to be maintainable in accordance with general health and safety requirements including the CDM regulations.
- All apparatus has to be installed in a structurally feasible manner.
- All apparatus has to be clear of existing features on the roof such as access points, air conditioning units, roof lights, or other electronic communications apparatus.
- All apparatus has to be installed in accordance with the requirements of the building owner or occupier.

5.7 The antenna design and position has been chosen to ensure that the development assimilates with the immediate surroundings and the context in which it will be seen.

5.8 The size of the proposed equipment cabinet has been limited that required for current and foreseeable network requirements. The location of the equipment cabinet, and the electronic communications equipment housed within it, also reflects the technical and operational requirement to be in reasonable proximity to the antenna system they support. This avoids exceptionally large runs of feeder cables and associated supporting trays, and the subsequent degradation or loss of signals.

Access Considerations

5.9 Access to the application site will use the existing vehicular and pedestrian entrance to the telephone exchange and thereafter use the established internal and external access routes to mid and upper roof levels. These routes do not require any alteration as part of the development proposed.

5.10 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.

5.11 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Landscaping

5.12 The proposal relates to the installation of electronic communications apparatus on the roof of a building at heights of over 20m (the equipment cabinet) and 32+m (the antenna) above ground level respectively. A scheme of soft landscaping is, therefore, considered unnecessary in this case.

Appearance

5.13 The sensitive approach to siting and design should minimise the appearance of the development proposed. Insofar as the antennas and other apparatus may be visible they should look straight forward in appearance and reflect their function. To that extent they should in time become accepted features of the local environment as with the similar forms of electronic communications apparatus already installed on the roof of the telephone exchange.

6. ICNIRP COMPLIANCE

6.1 A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application. Accordingly, as explained within the NPPF, it is not necessary to consider further the health aspects and concerns about them, which include the perception of risk.

7. SUMMARY AND CONCLUSIONS

7.1 The proposed development forms part of Arqiva's planned smart water metering communications network for Thames Water.

7.2 Smart water meters are at the centre of Thames Water's overall 25 year plan, which was approved by the Secretary of State for Environment in June 2012. This aligns with the wider Government programme to roll out across Great Britain between 2014 and 2020, a dedicated smart metering network for electricity and gas meters to homes and small businesses.

7.3 The smart water metering network is very important. The information provided by smart meters will allow Thames Water to properly understand water consumption and have greater network visibility, in turn allowing better network and resilience planning to ensure that demand does not outstrip supply. For consumers, smart water meters will allow users to better manage and reduce water consumption and potentially save money. Smart water meters will play an important role in the government's policies to achieve a transition to a sustainable economy and society.

7.4 The proposal accords fully with planning policy objectives for the installation of electronic communications apparatus on buildings and other structures, and the proposed siting and design has been chosen to minimise visual impact. The design and appearance of the structure should, therefore, be acceptable.

7.5 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and, therefore, no need to consider health effects and related concerns such as the perception of risk further.

7.6 This statement has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle

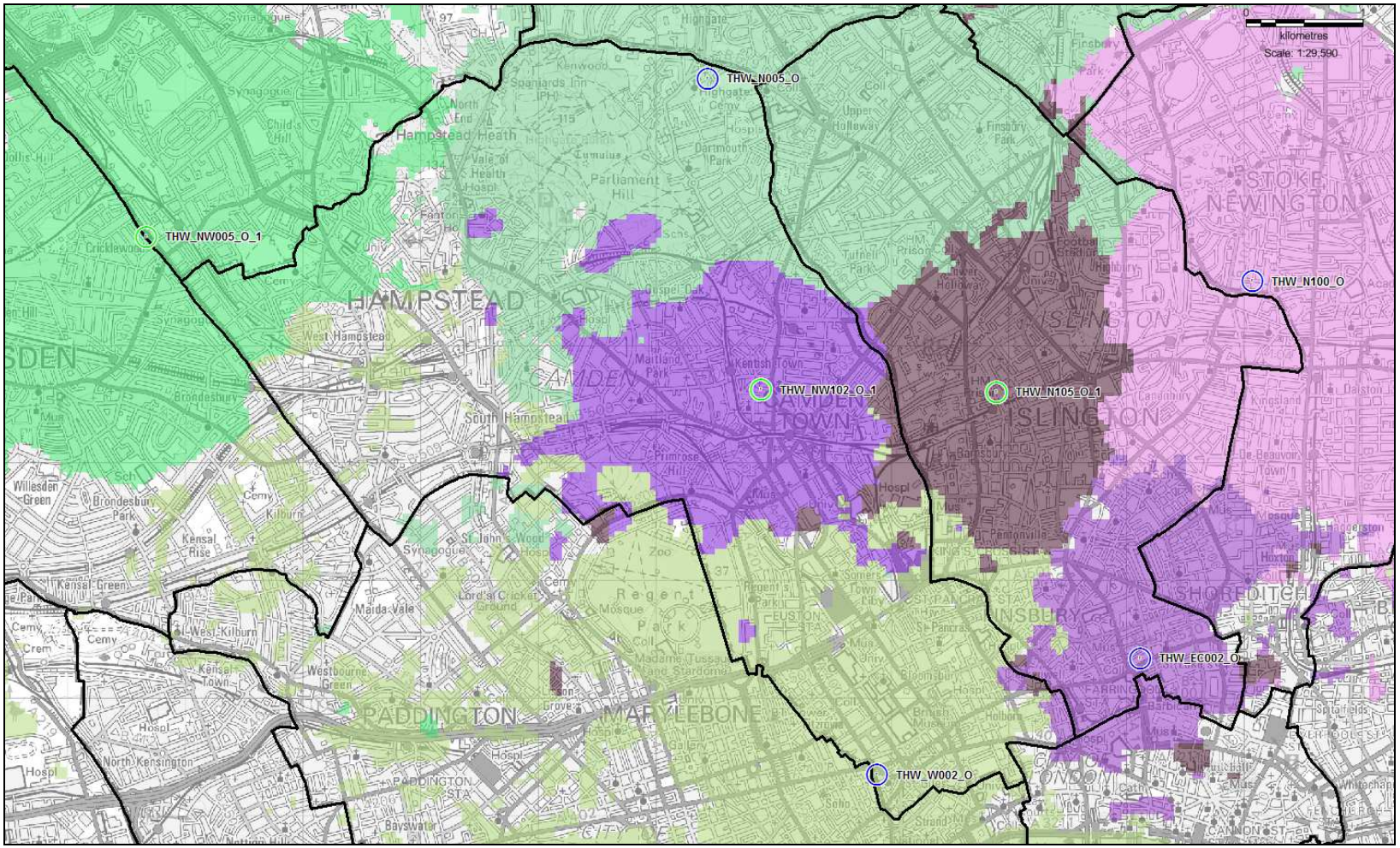
and in its detail complies with the policy objective of minimising potential environmental impact.

7.7 In conclusion, the application merits support and there are no material considerations that indicate otherwise.

Annex A

Radio Coverage Plots

Planned coverage without NW103 Hampstead Telephone Exchange



Planned coverage with NW103 Hampstead Telephone Exchange