SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	The Assembly House	Site Address:	The Assembly House 292 – 294 Kentish Town Road London NW5 2TG
NGR:	E: 529022 N: 185205		
Site Ref Number:	CTIL_150303_TEF_072750_VF_88298	Site Type:[1]	Macro

2. Pre Application Check List

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

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	**Yes**	
If no explain why: N/A		
Was the industry site database checked for suitable sites by the operator:	**Yes**	
If no explain why: N/A		

Annual Area Wide information to local planning authority

Date of information submission to local planning authority	October 2015
Name of Contact	Chief Planning Officer
Summary of any issues raised:	Strategic level pre-rollout meetings are held with the LPA to discuss the necessities of the project, benefits and best practice going forward.

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	09.12.2016	
Was there pre-application contact:		No
Date of pre-application contact:	N/A	
Name of contact:	N/A	

[1] Macro or Micro

Summary of outcome/Main issues raised:
LPA advised under reference 2016/6940/NEW that a fee of £960.00 was payable to use the pre-application service. While we appreciate that Camden Council have a formal and chargeable process for pre-application enquiries, our clients clearly have to weigh up the time and cost involved, compared to what is essentially a De-Minimis scheme for a telecommunications base station. In such case, it is considered commercially impractical to pursue a formal pre-application enquiry, particularly given the time and cost that will be incurred with the formal application process.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	~~Red~~	Amber	~~Green~~
Outline Consultation carried out: Consultation with local Ward Councillors for Kentish Town Ward Members (Cllrs Headlam-Wells, Gould and Apak) and Keir Starmer MP. Pre-application consultation letters and drawings of the proposals were sent to these parties on the 09.12.2016.			
Summary of outcome/Main issues raised: No response at time of making the application.			

School/College

Location of site in relation to school/college *(include name of school/college):* • St Patrick's Primary School • Eleanor Palmer Primary School • Bright Horizons Highgate Nursery and Pre-School
Outline of consultation carried out with school/college *(include evidence of consultation):* Pre-application consultation letters and drawings of the proposals were sent to these parties on the 09.12.2016.
Summary of outcome/main issues raised (include copies of main correspondence): No response received at time of making the application.

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

Will the structure be within 3km of an aerodrome or airfield?		No

Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		N/A
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	N/A (for prior approval applications only)	

3. Proposed Development

The proposed site:

Background

As part of Telefonica's 4G license obligation to provide 98% coverage by 2017, Telefónica is in the process of progressing a number of suitable sites for radio base stations, which will provide 4G coverage to current 'not spot' areas. This is fully in line with the Government's aim to ensure that everyone is connected to the superhighway.

In addition, Telefónica UK Ltd has entered into an agreement with Vodafone Ltd pursuant to which the two companies plan to jointly operate and manage a single network grid across the UK. These arrangements will be overseen by Cornerstone Telecommunications Infrastructure Ltd (CTIL) which is a joint venture company owned by Telefónica UK Ltd and Vodafone Ltd ("the operators"). The agreement allows both organisations to pool their basic network infrastructure, while running two, independent, nationwide networks allowing consumer choice.

The site:

This application relates to a replacement telecommunications installation at the site shown on the photograph below:

The Assembly House is a Grade II listed building located within the Kentish Town Conservation area.

Enclose map showing the cell centre and adjoining cells:
Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, web, TV and downloads. Without base stations, mobiles will not work. The attached coverage maps are a useful tool for establishing network coverage in an area. They are developed using assumptions regarding the handset use, expected level of call reliability and signal loss within a vehicle or a building. The main instigator for a new installation in this location follows the 'Notice to Quit' at Linton House. This permanent installation is required to pick up the loss of network capacity associated with the NTQ. The NTQ site is due to be removed from the network and the numerous local business and residents who depend on the service have noticed their service sharply diminish resulting in dropped calls, the inability to make calls and non-existent or slow internet access. Clearly this has resulted in significant detrimental, social and economic impacts for the community should a replacement not be found and this is contrary to NPPF. Fact sheets on Coverage and Capacity, Coverage Maps and Radio Planning and Propagation have been attached to this application for reference.

Type of Structure: Rooftop		
Description: The proposal relates to the proposed installation of 6 no antenna housed within GRP dormers and equipment cabinets contained internally within pitched roof together with ancillary development thereto.		
Overall Height: Antennas		17.30 Metres AGL (u/s) and 18.80 Metres (u/s)
Height of existing building:		20.20m AGL
Equipment Housing: 2 x Alifabs Flexi Rack and 1 x Ericsson Cube (all with same dimensions)		
Length:		600mm
Width:		600mm
Height:		1975mm
Materials:		
Tower/mast etc – type of material and external colour:	Housed within GRP shroud	
Equipment housing – external colour:	Internal housed within pitched roof (grey)	

Reasons for choice of design, making reference to pre-application responses:
The government through licence obligations regulated by Ofcom, are making the operators provide 4G service to the area and it is important that any design solution meets technical requirements in the most environmentally sensitive way. One of the main thrusts of 'Supporting High Quality Infrastructure' in the NPPF is a reduction in the proliferation of

telecommunications sites. The guidance states operators **"should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate."** The applicant has followed a sequential approach to site selection and has identified the Assembly House as an existing structure on which to site telecommunications apparatus.

As noted above the Assembly House is a Grade II listed building located within Kentish Town Conservation Area.

The choice of design of this proposal has been influenced by the new base station's siting and appearance, the need to provide replacement 2G and 3G and provide 4G network coverage and capacity to the Kentish Town area of Camden for Telefonica. The shared proposal will negate the need for more potentially operator independent sites to meet 4G obligations and replace the NTQ site which will is due to be decommissioned and removed from the network.

The area suffers from inadequate coverage, either as a result of no coverage at all leaving a gap in their networks or poor coverage from surrounding cells as evidenced on the attached coverage plots. A new replacement shared rooftop installation which would significantly improve network coverage and capacity to this area of Camden was the preferred option, as a greenfield and/or streetworks options would not provide the coverage required or considered appropriate for such a location and setting. Such an approach keeps the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network, which is in accordance with NPPF.

The proposed antennas and their position within the existing rooftop dormers offer a technically preferred solution, in which where possible the antennas will be titled and orientated so as to provide cell specific coverage to the demands of the target area. Taking into account the historic interest of Assembly House and the character and appearance of the Kentish Town Conservation Area, the extent of development has been kept to a minimum. Indeed, the scheme is considered De Minimis.

It is considered that the proposed antennas position within the existing dormers and camouflaged form behind GRP will reduce their visibility on the exterior of the building. Coupled with their position at height, it is considered that their visual impact will be very limited and their presence is likely to go unnoticed on the streetscape and skyline when seen in perspective from ground level.

This proposal also includes equipment cabinets housed internally within the existing pitched roof and as such these will not be visible from the public realm or in high level views within the area.

Therefore, following a technical review of the cell area, and an assessment of the possible alternative sites it was concluded that there is no other more suitable option, than the application site.

Given that the government, through the operator's licence obligations regulated by Ofcom, are making the operators provide 4G service to this area it's important we find the most environmentally sensitive way of doing this and mast sharing is the best way to do this, which also complies with NPPF.

It is considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site.

4. Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on or near the site are taken into account.	Yes	

In order to minimise interference within its own network and with other radio networks, Telefonica UK Ltd operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of Telefonica UK Ltd's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.	

5. Technical Justification

Reason(s) why site required e.g. coverage, upgrade, capacity:
As detailed above, the main instigator for a new installation in this location follows the 'Notice to Quit' and planned removal of the former site at Linton House. In addition. in this part of Camden there are no existing Vodafone or Telefonica installations, and the 2G, 3G (UMTS) and 4G (LTE800) radio coverage falls below the levels required to provide adequate high speed indoor services in the area. A shared de Minimis installation is proposed which will be located within the rooftop of Assembly House at a height of 17.30 metres and 18.80 metres. The height is required to ensure that the antennas can work effectively by clearing the level of the average rooftops and general clutter in the area. Coverage plots are attached to this planning application. They clearly demonstrate the need for this replacement proposal. The National Planning Policy Framework states at paragraph 46 that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt, the proposed installation is needed for Telefonica, via CTIL to replace and improve their 2G/3G/4G services and also to enable the operation and management of a single network grid across the UK using new technology. Fact sheets on Coverage and Capacity, Coverage Maps and Radio Planning and Propagation have been attached to this application for reference. In addition, further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the local authority in understanding any technical constraints on the location of the proposed development.

6. 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)

Alternative site options considered and rejected are as follows:

Site	Site Name and address	National Grid Reference	Reason for not choosing
RT	Highgate Studios 53 – 59 Highgate Road Kentish Town NW5 1TL	E:528717 N:185465	The site provider has not confirmed an interest in hosting telecommunications equipment on this site and as such the site has been discounted as it is not currently available.
ETS	Linton House 39 – 51 Highgate Road Kentish Town London	E:528813 N:185463	Existing NTQ site to be removed from the network. Accordingly, the site has been discounted as it is no longer available.

	NW5 1RT		
RT	Christ Apostolic Church Highgate Road London NW5 1JY	E:528293 N:185318	The site provider has not confirmed an interest in hosting telecommunications equipment on this site and as such the site has been discounted as it is not currently available.
RT	Forum Theatre 9 – 17 Highgate Road Kentish Town London NW5 1JY	E:528906 N:185349	The site provider has not confirmed an interest in hosting telecommunications equipment on this site and as such the site has been discounted as it is not currently available.
ETS	Kentish Town Fire Station Highgate Road London NW5 1NS	E:528938 N:185428	The site provider is in the process of trying to get the existing telecoms equipment removed from the site and is not willing to host a ground based mast.
ETS	10 Fortress Road Kentish Town London NW5 2ES	E:528992 N:185315	Building is not suitable for the installation of rooftop equipment. Accordingly, this site was discounted as not being suitable.
RT	Martyn Gerreard Estate Agents Fortress Road London NW5 2TH	E:529003 N:185271	The site provider has not confirmed an interest in hosting telecommunications equipment on this site and as such the site has been discounted as it is not currently available.
RT	Kentish Town Library 262 – 266 Kentish Town Road Kentish Town NW5 2AA	E:529029 N:185096	The site would not provide the required coverage due to low roof height. Accordingly, the site has been discounted as being not suitable.

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

It is noted that in determining an appeal brought by Orange PCS (now part of EE Ltd) against Stafford Borough Council, the Planning Inspectorate addressed the issue of considering alternative sites. In allowing the appeal the Inspector stated in addressing local plan policies 'Nor do I consider it is either realistic or reasonable to take the view that the absence of consideration of every possible option and alternative would mean that this policy was complied with ... PPG8 does not indicate the need to embark on an examination of every possible alternative in an iterative process ... the adequate analysis of feasible alternatives is a more realistic approach.' (APP/Y3425/A/02/1084110).

Land Designations (if Heritage Statement is required then include here or make reference to attached Heritage Statement):

The application site is a Grade II listed building located within the Kentish Town Conservation Area. In this regard the impact of the development, whether that be positive, negative or neutral on the site's land use designation will be considered in more detail below.

Please refer to the attached Heritage and Design and Access Statement's.

Additional relevant information (planning policy and material considerations):

From the outset, it should be appreciated that irrespective of the proposed installation's use as a telecommunications base station, any change in form in the streetscene will always be, to some degree, a noticeable alteration to those residents and regular passers-by found closest. However, it should be recognised that visibility or a development's siting and appearance, does not automatically result in an overwhelming adverse harm.

In light of the above it is considered that the planning assessment of this case should concentrate on whether the proposed installation in terms of its form and siting are significant as to outweigh other material planning matters. Also the latest proposal subject to this application should be reviewed against the up-to-date planning policy regarding telecommunications development.

As discussed previously with regards the choice of design it is considered that the proposed development will not undermine the visual amenity of the area.

PLANNING POLICY

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF is pro – development with a '**presumption in favour of sustainable development**' being seen as a golden thread, running through both plan making and decision taking'.

The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

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

National Planning Policy Guidance

The governments National Planning Policy Framework (NPPF) was published on 27 March 2012 and consolidates the majority of planning policy documents into a single circular (including PPG8, and PPS1). The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. The main thrust of the guidance is a presumption in favour of sustainable development. In general terms in respect of telecommunications the guidance aims to promote sustainable transport (including the need to travel), build a strong and competitive economy, and seeks to secure high quality design. Paragraph 42 of the framework document sets out the objectives of the Communications Infrastructure. It states that '*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'.*

Specifically, the National Planning Policy Framework advises that advanced, high quality communications infrastructure is essential for 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. The numbers of radio and telecommunications masts should be kept to a minimum and, where new sites are required,

equipment should be sympathetically designed and camouflaged where appropriate (paragraph 43).

The framework also advises on conserving the historic environment. It sets how local planning authorities should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. Paragraph 126 states:

"Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- *the desirability of new development making a positive contribution to local character and distinctiveness; and*
- *opportunities to draw on the contribution made by the historic environment to the character of a place".*

Paragraph 128 advises 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Paragraph 129 advises 'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal'.

Paragraph 131 states "in determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

- the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 132 advises that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional'.

Paragraph 133 advises 'where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, 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:

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

Paragraph 134 advises 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use'.

Paragraph 137 advises that '*local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance if the asset should be treated favourably.*

Paragraph 138 states 'not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole'.

In more general terms the NPPF confirms that proposals that accord with the provisions of the development plan should be approved without delay (paragraph 14). In addition, a set of core planning principles are set out at paragraph 17. These principles set out (in part where relevant to this proposal) that the planning system should:

- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;
- seek to secure high quality design and a good standard of amenity;
- support the transition to a low carbon future in a changing climate.

Significant weight is given to the need to support economic growth through the planning system (paragraph 19). The reduction in the need to travel is set out in section 4. The National Planning Policy Framework advises specifically that local planning authorities should not seek to prevent competition between operators, and must determine applications on planning grounds (paragraph 46).

It is considered the proposed development complies with the broad aims of the Framework. It assists in the aim to keep the number of installations to a minimum, with Telefonica and Vodafone achieving replacement and upgraded coverage for 2G, 3G and 4G networks from a single shared installation. The equipment has been sympathetically designed and it would enhance the provision of local community facilities and services. In terms of conserving the historic environment it is considered the specific design ensures there would be no harm caused to the host listed building or the character and appearance of the conservation area.

Code of Best Practice on Mobile Network Development in England (24 November 2016)

The Code of Best Practice has been fully revised in November 2016 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information super highway 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 (2013).

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 Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

Section 2 of the Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that the continued expansion and development of mobile networks is a key element of the National Infrastructure Delivery Plan 2016 – 2021. This recognises that digital communications are now a crucial component of everyday life, with improvements in connectivity being key to a vibrant economy (para 2.1).

Paragraph 2.2 goes on to state that consumers, businesses and public bodies increasingly rely 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.

Section 2 of this Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth. Section 3 of this 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. Paragraph 3.1 explains that 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. Paragraph 3.2 clearly indicates that in assessing the visual impact, greater emphasis than previously should now be placed on the radio planning requirements to achieve mobile coverage (as shown in the recent changes to permitted development rights, at the end of November 2016, and the reduced test in the most recent NPPF.

Paragraph 3.3 goes on to highlight that the [operator systems tend to be demand-led or to fulfil coverage obligations. With the ever increasing demand for data hungry applications available to a range of connected devices, such as smart phones and tablets, the requirement to upgrade and improve networks through changes to existing sites and the development of new sites is constant. As most parts of the country move on to a superfast highway, so the need to bring coverage to 'not spots' (i.e. areas where there is no mobile coverage from any operator) and improve coverage in 'partial not spots' (i.e. where there is some coverage but not from all operators) intensifies.

Paragraph 3.4 of The Code provides advice to local Planning authorities who are concerned about proposals, stating that they should not 'look for problems' but should work proactively with the Mobile Network Operators to find solutions, in line with paragraph 187 of the NPPF. Section 4 of the Code sets out the evolution of mobile networks from 2G voice calls and text to 4G superfast mobile broadband which are now approximately the same speeds as fixed broadband connection.

Paragraph 4.1 of the Code acknowledges that customer expectations have evolved with technology. The expectation is that they will always be connected and able to access services in exactly the same way as fixed broadband for personal, educational and business purposes.

Paragraph 4.2 acknowledges that data, i.e. using the internet, puts increased demand on capacity and therefore the need for additional base stations to keep abreast of customer demand. Also 3G base stations, originally using higher frequencies didn't travel as far and therefore each base station covered a smaller area. However, changes in working practices for the operators, in line with national guidance, streamlining networks, sharing base stations has reduced the overall amount of infrastructure required.

The Code goes on to acknowledge that operators maximise the use of their existing network infrastructure for the provision of 4G services and are similarly upgrading their 3G 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 needs to be enhanced in line with Government commitments and customer demand.

Similarly, some new sites will be required to replace existing sites that are lost, for example, through redevelopment of an existing building. Some masts may need to be redeveloped or replaced to enable an upgrade in services to take place.

Section 5 relates to mobile connectivity in the 21st Century, explaining that mobile phones and other devices are now everywhere. Mobile connectivity is not just making calls and texts but also mobile broadband. The majority of mobile phones in the UK are Internet-enabled smartphones and large numbers of people also now own tablet devices. People are increasingly choosing to access the internet using a mobile device even when they have fixed broadband connection available.

The Code acknowledges that by the second decade of the 21st Century, the greatest increase in traffic across mobile networks was in data i.e. internet use (para 5.3). Paragraph 5.4 states that in terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5% in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade.

Section 5 of the Code goes on to highlight that connectivity promotes social inclusion. In recent years, more people rely on a mobile phone than they rely on a landline. Furthermore, people on lower incomes are even more likely to live in a mobile only household, or to access the Internet using a mobile connection (para 5.5).

The Code illustrates that mobile connectivity helps in the delivery of public services e.g. to access Central and Local Government via online services, acknowledging that lives are more likely to be saved when a 999 call is made from a mobile than from a landline, Telehealth is becoming increasingly important and text message reminders also improve compliance with medication and keeping NHS appointments.

Good mobile connectivity also promotes sustainability e.g. it reduces the need to travel and thus carbon emissions (para 5.7). The Code continues to support mobile telecommunications network as it is seen as a crucial piece of national infrastructure in economic, community and social terms (para 5.8).

Paragraph 5.9 states 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 driven by increasing consumer demand for data, improved connectivity and more capacity, together with Government aspirations for improving connectivity and coverage.

Section 7 of the Code sets out the need for all agencies to work together to deliver connectivity that is essential to the country's economy and society including Central Government which provides the overall strategy for connectivity, mobile operators to deliver the mobile network development through the planning system and helping to identify land and structures suitable for mobile infrastructure. Local Planning authorities can also ensure that the planning function works in tandem with other relevant departments and agencies such as their own economic development departments and appropriate digital connectivity teams in order to facilitate digital connectivity.

The Code provides guidance on siting and appearance principles at Appendix A. It sets out a number of design principles in respect of telecommunications development. However, the code acknowledges that the options for design used by an operator will be affected by site conditions including requirement to link the site to the network, landscape features and coverage and capacity requirements. The main options for the operator include:

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

The Code in Appendix A acknowledges that it has been a long standing Government policy objective to support the sharing of masts and sites. Operators also aim to site share wherever viable. If operators are able to share sites, and install more equipment on each site, this reduces the overall visual impact of network infrastructure, because even though shared sites will tend to be slightly bigger, it means that fewer sites are needed to improve coverage and capacity, infrastructure becomes more feasible, and is more cost-effective to deploy. In fact, sharing of sites is now the norm, and network operators now share much of their network infrastructure via joint venture commercial arrangements.

However, the Code also highlights the constraints of mast sharing. Acknowledging that mast sharing may not be an appropriate environmental or technical solution in all cases. Visual intrusion may occur. The Code indicates other constraints which may include:

- Coverage problems – The existing mast may be poorly located or not have sufficient height to give the required coverage;
- Radio interference – Antennas need a separate amount of vertical and horizontal separation. This could lead to the visual impact of the mast significantly increasing;
- Structural Loading – The existing mast may not be able to hold extra equipment. The existing mast may need to be strengthened, redeveloped or replaced with a bigger structure with a consequent effect on visual amenity.

The Code also provides advice on more sensitive locations including conservation areas and listed buildings. It states that operators may be able to avoid specific locations such as listed buildings, but not an entire protected area. In such cases, they should seek to minimise the impact through sensitive design and appropriate siting of the proposals.

Fixing the Foundations: Creating a more prosperous nation (July 2015)

This document known as the 'Productivity Plan' sets out a 15-point plan that the government will put into action to boost the UK's productivity growth, centred around two key pillars: encouraging long-term investment, and promoting a dynamic economy. It sets out the government's long-term strategy for tackling the issues that matter most for productivity growth.

Chapter 7 of the Productivity Plan refers to 'World-class digital infrastructure in every part of the UK'.

The Plan states a *'Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home. Investment in high speed broadband will support long-term economic growth, with GVA increasing by £6.3 billion, causing a net increase of*

20,000 jobs in the UK by 2024.1 Geographic coverage and take-up of superfast broadband in the UK is already the highest of the 5 largest EU economies.2 The government's superfast broadband programme is passing an additional 40,000 premises every week – superfast speeds of at least 24Mbps will be available to 95% of UK households by 2017'.

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

House of Commons: Written Statement (HCWS631) (March 2016)

A Written Statement made by: Minister of State for Housing and Planning (Brandon Lewis) on 17 March 2016 sets out how the Government will support digital connectivity to provide the opportunity for everyone to connect to the information superhighway and boost our economic prosperity.

"Fixing the foundations: Creating a more prosperous nation" (Cm 9098) set out our commitment to support market investment and streamline legislation to make it easier to roll out the mobile infrastructure that this country needs.

Views on how this could best be achieved were sought through the Call for Evidence: "Review of how the planning system in England can support the delivery of mobile connectivity" published on 10th July 2015. The review also sought evidence on the effectiveness of planning freedoms introduced in 2013.

The Government confirmed it is firmly committed to ensuring there is sufficient capacity to meet the growing demand for mobile connectivity. The majority of respondents to the July consultation recognised that digital connectivity is an essential service that communities and business want and need. There was support for the Government's ambition to maximise coverage and for commercial investment.

Importantly it has been recognised that there are opportunities to support mobile connectivity whilst ensuring local communities retain their role in influencing the visual impact of new infrastructure.

This Government intends to bring forward provisions in England to provide greater freedoms and flexibilities for the deployment of mobile infrastructure. The government unveiled a series of changes regarded as vital for our continued economic prosperity and social inclusion for all. They will help ensure that mobile operators have the confidence to invest in their network coverage and boost capacity for both voice and data.

A new Part 16 of the GPDO (England) came into force as of the 24th November 2016. The changes have arisen following 'Fixing the Foundation's and acknowledge that digital communications are an integral part of modern life and that not everyone has access to the fastest broadband speeds and mobile services

Local Planning Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

The Development Plan as defined by the Planning and Compulsory Purchase Act 2004 for Camden Council currently comprises the following documents:

- The London Plan: Spatial Development Plan for Greater London, February 2008 which comprises the Spatial Development Strategy for Greater London;
- Camden Core Strategy 2010
- Camden Development Management Policies 2010

The London Plan 2016

The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. Paragraphs 1.58-1.60 'Impact of new technology' of the Plan recognises the growing strategic importance of new communications technology services, such as 4G coverage, will help to deliver:

1.58 – Transactions using increasingly sophisticated communication technologies have grown enormously, affecting every aspect of everyday life. E-tailing, e-commerce and e-government are all likely to have an impact on London and its place at the core of local networks. This plan addresses issues of the digital divide between those who have and do not have access to the new technologies, distinguishing between the needs of commerce and residents. Economic and population growth in higher density, intensive development will make it more economic to ensure the provision of broadband and new technologies.

1.59 – In the emerging information society, London will need to become increasingly a learning city in which skills and the ability to use information will be essential. This will place heavy demands on education and training resources.

1.60 – Finally, information technology will add to the flexibility of home and work environments, but will not replace the need for regular face-to-face meetings. It may lead to work journeys being spread over a longer part of the day, and to more local journeys being made, for example to services and cafes.

In this regard, the proposal to install telecommunications equipment at the Assembly House, meets with this planning strategy for Greater London and will facilitiate many of the requirements which this strategy has been designed to provide for the residents of Greater London.

Camden Core Strategy (2010)

There are no policies specific to telecommunications in the Council's Core Strategy Document. CS10 relates to Supporting community facilities and services.

Policy CS14 refers to the 'Promoting high quality places and conserving our heritage'. This policy requires development to conserve and enhance the historic significance of the borough's designated assets.

Policy CS14 states 'The Council will ensure that Camden's places and buildings are attractive, safe and easy to use by a) requiring development of the highest standard of design that respects local context and character; and (b)preserving and enhancing 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'.

The building is located within a conservation area on a Grade II listed building. The proposed installation designed to the highest standard would result in extremely limited changes to the appearance of the site, and accordingly the impact on the heritage asset is less than significant.

Paragraph 14.7 states 'High quality design also takes account of its surroundings and what is distinctive and valued about the local area. Camden is made up of a diversity of areas, each with their own distinctive character, created by many elements such as architectural style and layout, social and economic history, landscaping and mix of uses. The Council will therefore expect the design of buildings and places to respond to the local area and its defining characteristics and reinforce or, if appropriate, create local distinctiveness'.

Camden Development Management Policies 2010

Policy DP24 refers to 'Securing high quality design'. The policy requires all developments, including alterations and extensions to existing buildings, to be of the highest standard of design, taking into account (a) character, setting, context and the form and scale of neighbouring buildings and c) he quality of materials to be used.

Policy DP25 refers to 'Conserving Camden's heritage'. In order to maintain the character of Camden's conservation areas, the Council will (Point b)'only permit development within conservation areas that preserves and enhances the character and appearance of the area'. Moreover, to preserve or enhance the borough's listed buildings, the Council will (g) not permit development that it considers would cause harm to the setting of a listed building.

As the proposal is for very minor alterations to an existing building, it is considered that the proposal is in compliance with Policy DP24 and DP25.

Other Planning Guidance

The site lies within the Kentish Town Conservation Area. The Kentish Town conservation area appraisal and management strategy was adopted in February 2011.

The Kentish Town Conservation Area has at its core the village of Kentish Town located in the old parish of St Pancras, on the Kentish Town Road running north-south from Highgate to St Pancras. The village settlement can still be perceived in the remaining eighteenth and early nineteenth century core. Leighton Road running east-west links the two separate parts of the conservation area. To the west is the commercial edge on Kentish Town Road with remnants of the roadside taverns, the Assembly House Pub, shops and 304 Kentish Town Road, an eighteenth century building perpendicular to the Road.

The conservation area appraisal notes that local landmarks include the Assembly House at the corner with Kentish Town Road.

Planning Assessment

The London plan (2016), The Camden Core Strategy (2010) and Camden Development Management Policies (2010) are used for the determination of planning applications.

The National Planning Policy Framework (NPPF) does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12). The NPPF adds (paragraph 215) that due weight should be given to relevant policies in existing plans according to their degree of consistency with the framework; the closer the policies in the plan to the policies in the Framework, the greater the weight that they may be given as a material planning consideration.

This radio base station will replace the existing site at Linton House, in line with the NPPF. The Code of Best Practice also acknowledges that **new sites are necessary when existing sites are no longer available**. This existing site is no longer available to the operator as the site providers have been served with a 'Notice to Quit'. The site will be decommissioned and the apparatus switched off. The operators' license obligations require them to meet customers "reasonable demand". Reasonable demand would be to provide indoor coverage as customers expect to be able to use their handsets indoors. The operators also have a competitive market driven "requirement" to provide a high quality service. The area suffers from inadequate coverage, either as a result of no coverage at all leaving a gap in their networks or poor coverage from surrounding cells. As such, there is a need to improve the existing 2G and 3G network as the area suffers from poor coverage as a result of a weak signal strength, which in turn impacts on its capacity and the services that can be offered. A reduction in the strength of the radio signal increases the likelihood of lower quality or dropped calls and significantly reduced or no data rates for internet browsing, for example. In addition to improving the existing networks, 4G would also be provided. Therefore, a multiple technology network requires robust signal levels to provide the capacity and speeds needed to make calls, send texts and access the internet either on the move or static for all its users wherever they are in the country. However, none of this can happen without the necessary infrastructure network in place that delivers mobile communications service

In the latest Ofcom Infrastructure Report - Connected Nations 2015, it is said that "High quality, widespread communications, fixed and mobile, are an engine of our economy and the pulse of our society. They are not nice-to-haves, but essential enablers of our working and social lives. As businesses and consumers drive an ever-increasing demand for communications, the infrastructure that serves them must keep pace with their demands and needs." The report also outlines that in the UK there is an increasing trend towards mobile phone usage only, in which voice calls via traditional landline telephone is falling. Wireless broadband within households remains to play an important role in connectivity, however given the very nature of mobile devices, a robust telecommunication infrastructure needs to be in place throughout the UK to support people's everyday needs. Indeed, it is said in the 2015 Ofcom report that more consumers have switched from traditional mobile handsets to smartphones over the past year with over 66% of the adult population now using a smartphone when compared to 39% ownership in 2012. The increasing use of 3G and 4G compatible mobile smartphones and tablets has led to an increase in the amount of data used by consumers which grew by a factor of 64% over the past year. Indeed 2015 statistics suggest that 93% of UK households and business premises are covered by all the established operators that provide 2G networks.

With regards 3G services 88% of the UK are said to be covered by all four operators, but for 4G this drops to 46%."

The attached, BBC article points out the significant social and economic benefits associated with 4G service, which the proposal would retain in the area. "When the significant consumer, social and economic of faster mobile connectivity are considered, it is clear 4G is more than just an iterative improvement of mobile phone speed. With more and more important – parts of our lives going online by the day, 4G will enable a fully connected world where nearly all our digital devices are mobile-enabled and as a result become more flexible and integrated into our daily lives".

In addressing the need for a replacement site as well as the coverage deficiency, a sequential approach to site selection, in accordance with Government guidance has been taken. The starting point for consideration should always be with an operator's own existing masts and/or sites in the first instance and secondly using existing telecommunications structures belonging to another code system operator, i.e. mast sharing. The next appropriate steps are to consider co-location or site sharing alongside existing telecommunications development then installing antennas on existing buildings or tall structures before erecting a new ground based mast. If a new mast or base station is required, evidence that the applicant has explored the possibility of erecting antennas on an existing mast, building or other structure is necessary in accordance with paragraph 45 of NPPF.

To find a new site an assessment of possible alternative sites were considered which explored existing masts, buildings/structures and new sites for mast within the search area. The starting point was with the operator's own existing masts and/or sites, which were discounted as there aren't any. Also, the operators own surrounding base station sites cannot be upgraded to improve the signal and compensate for the inadequate coverage in the immediate area as they have been subject to their own upgrades to maximise their performance within the single grid. Consequently, there are no existing telecommunications structures and sites belonging to another code system operator to share or site share, however, in this instance the Assembly House which is of an appropriate height and is available within the search area to use before consideration of a new ground based mast. Therefore, a rooftop installation was the preferred option, as a greenfield and/or streetworks options would not provide the coverage required or considered appropriate for such a location and setting.

Following a technical review of the cell area, it was concluded (as evidence is Section 6) that there is no better site in balancing the technical requirements of the operators, whilst minimising environmental impact. Therefore, the site remains the operators technically preferred location as it firstly fulfils their primary coverage objectives for 2G, 3G and 4G technology within the cell area.

The height and position of the antennas on the building are so that they can be justified from a technical perspective as the antennas need to clear the immediate roof so as not to create signal clipping and reflection. The height of a proposed antenna has to be offset against its positions on the roof, whereby the closer to the centre of the roof of the building the more height that is needed to clear the immediate roof space in front of the antenna. The installation of 6 no antenna within GRP dormers will enable both operators to provide the multiple technologies and meet their full coverage requirements to the target area, which ideally is the operators preferred option. Given the technical constraints of 3G and 4G technology and the need to provide coverage for the multiple technologies the height and position of the antennas need to be above the built and natural clutter so as to be able to project adequate coverage out over the target area to significantly improve the continued need for both coverage and

capacity for the multiple technologies. The height of the antennas are 17.35 metres and 18.80 metres to underside.

It must be appreciated that the way we use our mobile devices are changing. We are watching more videos, playing more games and are streaming, tweeting and browsing more than ever before. Furthermore, mobile communications enable businesses and individuals to be more productive and offer new and innovative services. Demand for access to mobile communications on the move has increased significantly over the last 10 years with many people now seeing this as an everyday necessity. A high quality communications infrastructure with good mobile connectivity and the availability of mobile broadband play a vital role in economic growth, social inclusion, accessibility to services and sustainability. In this regard the rollout of 4G networks is seen as a major investment which will facilitate social and economic benefits through greater connectivity. Consumers and businesses should be confident that their mobile technology will work wherever they are in the country. However, none of this can happen without the necessary infrastructure network in place that delivers mobile communications service.

The proposal is in accordance with paragraph 42 of NPPF which states "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". Furthermore, it is complies with paragraph 43 as it keeps the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Moreover, it is considered that an extensive and robust search has been undertaken. Indeed, such an approach to site selection conforms to paragraph 43 and 45 of NPPF.

The proposed development fully complies with the Camden Core Strategy and Development Management Polices and the NPPF. Government and local planning guidance states that in order to limit visual intrusion the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need of a new site has been justified [NPPF para 43].

The proposed radio base station site is located within a commercial area, and the antenna will be housed within the existing rooftop. It is considered that the siting and design of the proposed installation would not result in an unacceptable appearance. Indeed, it is considered the proposal is de Minimis. The proposed replacement installation will meet the aspirations of the NPPF which encourages the use of sympathetic design to minimise the impact of the development on the environment as well as the utilisation of existing masts. The proposals relate to the addition of 6 no. antennas within GRP dormers of the rooftop of the Assembly House.

The Code of Best Practice also acknowledges that the visual impact of the mast can be greatly reduced if it is placed near similar structures. The site is located within the rooftop of the Assembly House which is an existing structure. The addition of 9 no. antennas in this location will not be visible in the streetscene thus ensuring the character, appearance and the setting of the Grade II listed building are preserved. As a result, the proposed design fully accords with the Code of Best Practice, the NPPF and the Council's Core Strategy and Development Management Policies.

As already highlighted the antennas have been positioned in a way that it will not impinge on the skylines or vistas of Kentish Town Conservation Area or the host Grade II listed building. This respects the quality and character of the sensitive area and will not cause a significant impact upon the visual amenity of the site. Consequently, the character and appearance of the conservation area will be maintained and the proposed replacement equipment therefore fully complies with the Council's Core Strategy and Development Management policies.

The NPPF strongly supports sustainable development, as does The London Plan and the Council's 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, 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. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore comply with NPPF, The London Plan, Camden Core Strategy and the Council's Development Management Policies to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

The proposal will help to meet the operator's license obligations and continue to meet the reasonable customers' demands which include being able to access their mobile phone whenever and wherever they are. The additional installation will continue to enable the operator to provide a high quality service to its customers and access to the latest technologies. An installation located outside this search area would not allow the operator to provide their desired level of coverage and therefore would not adequately fill the 2G/3G/4G coverage/capacity gap.

Taking into account the relevant planning policies which are applicable it has been illustrated that the proposed upgrade fully accords with national planning policy guidance, the Camden Core Strategy, Development Management Policies and the Code of Best Practice. In light of the above, the applicant considers that the proposal strikes a good balance between environmental impact and operational considerations.

This is the optimum planning option given the scale of the built form and the listed building status within Kentish Town Conservation Area. It is considered that the proposed development is acceptable in this location, and it would not appear visually intrusive (demonstrating less than demonstrable harm) or detrimental to the character of the street scene and provide significant public benefits. The proposal provides a well balanced approach to telecommunications development and preserving the appearance and special historic and architectural interest of the listed building and the character and appearance of the conservation area.

Health & Safety

Court cases have confirmed that the public perception of health risks can be a material consideration within the land-use planning system. However, the weight to be attached to this issue has to be determined accordingly in each case by the decision maker. It has been generally held, and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed installation will comply with the ICNIRP guidelines.

It should be recognised that it has been long since established that it is Central Government's stance that the planning system is not the appropriate mechanism for determining health safeguards. It remains Central Government's responsibility to decide what measures are necessary to protect public health. Most notably it is Central Government's view that if a proposed development meets the ICNIRP guidelines for public exposure it should not be necessary for a Local Planning Authority, in processing an application for planning permission or prior approval, to consider further the health aspects and concerns about them.

In this respect the operators believe that it is not necessary to consider health effects further. Telefonica is committed to ensuring that all new installations are ICNIRP compliant therefore it is considered that there is no basis for this case to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. An ICNIRP compliance certificate is attached as part of this submission, as required by NPPF paragraph 45 and the Council's Development Plan, in which the ICNIRP declaration takes into account the cumulative effect of the emissions from the proposed installation and all radio base stations present, at or co-located near to the proposed installation. Radio frequency emissions from the proposed installation will be many times lower than the ICNIRP reference standard in all publicly accessible areas around the installation. In the light of the above information, it is clear that the weight to be given to such concerns should not be so great as to warrant a refusal of the case on health grounds

Summary

The proposed installation will enable the operators to provide replacement and upgraded 2G/3G services as well as new 4G services around the NW5 area. This will support the operators 4G license obligations to provide coverage to 98% of the country by 2017. Thus providing a high quality service to its customers and access to the latest technologies whenever and wherever they are.

Without this proposal, there will be a fundamental loss of service in the area following the forthcoming decommissioning of the existing site on Linton House. This will have significant ongoing detrimental social and economic impacts should a replacement not be found.

Installing a radio base station on an existing structure in this location, providing replacement 2G/3G and new 4G coverage will fully meet the national Governments aim of '*ensuring that everyone is connected to the information superhighway*' and the national policies set out in NPPF.

"Recognising the vital importance of mobile connectivity for residents and local economies, the urgent delivery of the required network improvements continues to be a Government priority. As recently as 9th March 2016 Prime Minister David Cameron stated:

'*Ten years ago, we were all rather guilty of leading campaigns against masts and all the rest of it. Our constituents now want internet and mobile phone coverage. We need to make sure that we change the law in all the ways necessary, that the wayleaves are granted, that the masts are built, that we increase coverage and that everyone is connected to the information superhighway.*'

This is substantiated in the most recent budget announcement of 16th March 2016, which commits to provisions for "greater freedoms and flexibilities for the deployment of mobile infrastructure". The proposed replacement telecommunications base station at the Assembly