SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Henderson Court,	Site Address:	102 Fitzjohns Avenue, London, NW3 6NR
National Grid Reference:	526540/185505		
Site Ref Number:	148399	Site Type:[1]	Macro

1.1 Background

The operators have been searching for a site to locate a base station in this part of Camden for many years. Currently, coverage is sub-standard. A site at Henderson Court will help provide high quality 2G, 3G and 4G coverage to Telefónica (trading as O2) and Vodafone customers in the surrounding area. Henderson Court is one of a series of Camden Council owned properties which has recently been made available to the operators and other infrastructure providers as part of a drive for alternative sources of revenue given reductions in central government housing funding.

2. Pre Application Check List

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

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

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: A consultation letter giving the Council's Planning Department an opportunity to provide feedback to the proposed development was issued. The Council requested a fee of £960. While we have no objections to a fee for this service, in accordance with the Government advice this needs to be based on cost recovery. The requested fee exceeds application fee by two and half times. As such it was considered appropriate to proceed directly to a formal application.	

[1] Macro or Micro

Community Consultation

Rating of Site under Traffic Light Model:	Red	**Amber**	Green

Outline of consultation carried out:

As with all CTIL and Telefónica proposals, the site and proposed works were assessed against the traffic light model contained within the Code of Best Practice on Mobile Network Development (2016).

An amber rating was assigned in this instance. Hampstead Town Ward Councillors Cooper , Currie and Stark and ajacent Frognal and Fitzjohns Ward Councillors Baillie, Mennear and Spinella as the site is close to the ward boundary were sent consultation letters and drawings on 21 December 2016, along with Tulip Siddiq, MP for Hampstead and Kilburn.

In addition to this, two site notices were posted on lampposts,one on Prince Arthur Road to the north of Henderson Court and one on Fitzjohn's Avenue to the west of Henderson Court, on 21 December 2016, to capture the interest of anyone else who may have an interest but was not contacted directly.

An invitation to an open meeting was issued to the residents of Henderson Court by Camden Council, and the meeting held on 7 February 2017. The meeting was chaired by Camden Council's Business Analyst for Connectivity & ERP, who informed the residents who attended of the overall Camden Council strategy to accommodate operators on their properties in order to bring in much need revenue, set out the proposed installation and all installations would comply with ICNIRP guidelines, which have been adopted by WHO and Public Heath England. Representatives from Waldon Telecom attended on behalf of the operators, and provided amongst other things an explanation of the proposed development via the drawings and photomontages. A question and answer session followed, with the most common points relating to interference and health. Further information was provided, residents were given the opportunity to take a hard copy of the drawings, photomontages and information sheets away with them, and residents appeared to be satisfied that their concerns had been addressed.

Summary of outcome/main issues raised:

Apart from the meeting summary set out above, Cllr Cooper replied via email on 13/01/17 to clarify that he is generally not opposed to phone masts due to an understanding of physics, and to ask if the proposed handrailing was necessary. A response was sent via email dated 19/01/17, setting out that the hand railing is indeed necessary as there is no edge protection around the rooftop and the handrail represents the required fall prevention system employed to ensure the safety and wellbeing of the engineers working on the rooftop. The response further clarified that the operator and their suppliers have an obligation to create a safe environment for people on the rooftop and prevention systems are always first employed where possible. In this scenario, we can utilise fall prevention (the hand railing) and we are also restricting access around the rooftop to the antenna and kit locations by utilising the hand railing to channel the access accordingly and keep the workers away from the unprotected edge of the building. No further response was received.

School/College

Location of site in relation to school/college *(include name of school/college):*
There are a number of educational/non domestic childcare establishments close to the proposed site:

- Fitzjohn's Primary School, 86A Fitzjohn's Avenue, London, NW3 6NP, c.11m from application site
- St Anthony's Preparatory School, 90 Fitzjohn's Avenue, London, NW3 6NP, c.37m from application site
- North Bridge House Senior School, 65 Rosslyn Hill, London, NW3 5UD, c.35m from application site
- The Academy School, 2 Pilgrims Place, London, NW3 1NG, c.220m from application site.
- University College School, Frognal, London, NW3 6XH, c.20m from application site.
- Devonshire House Preparatory School, 2 Arkwright Road, London, NW3 6AE, c.225m from application site
- Hampstead Parochial Church of England Primary School, Holly Bush Vale, London, NW3 6TX, c.260m from application site
- Hampstead Community Centre Playscheme, Fitzjohns School, 86a Fitzjohns Avenue, London, NW3 6NP, c.11m from application site
- Camp Beaumont - UCS, University College School, Frognal, London, NW3 6XH, c.98m from application site
- Hampstead Community Centre, 78 Hampstead High Street, London, NW3 1RE, c.229m from application site

Outline of consultation carried out with school/college *(include evidence of consultation):*
Consultation letters were emailed to the Headteacher and Chair of Governors of the above schools and to the Manager of the other establishments 21 December 2016.

Summary of outcome/main issues raised:

Email correspondence has been undertaken with a gentleman representing St Anthony's School, Fitzjohn's Primary School, 92 Fitzjohns Avenue and the Alpha Group; other individuals were copied in. Drawings, photomontages and fact sheets regarding health and mobile phone base stations such as that proposed were sent. The representative objected to the proposal on health, visual and disruption grounds. A resident of 92 Fitzjohn's Avenue requested photomontages or line drawings from their property, but individually tailored information from private properties is not provided by the operator.

Visual impact of the radio base station on the outlook from nearby properties cannot be a reason to refuse a planning application. This is because it is well understood by town planners there is no entitlement to a view across a third party's land. Planning is carried out in the public interest and it is only when private and public interests coincide will a view across a third party's land, which is essentially a private property interest, become a material planning consideration. As with views over any adjoining land, that the proposed radio base station may be seen from nearby properties does not equate with harm and cannot normally be regarded as a material planning consideration. It is only when the visual impact of adjoining development, in this case the proposed radio base station, from a principal living room of a nearby property becomes overbearing can it be considered as a material planning consideration.

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

Will the structure be within 3km of an aerodrome or airfield?	Yes	**No**
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	**No**
Details of response: N/A – full Planning Application.		

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	No
Date served:	Article 13 notice served 17/02/17	

3. Proposed Development

The proposed site:
The application site is a square shaped brick building bounded by the busy B511 Fitzjohns Avenue to the west, Prince Arthur Road to the north, and an access road to the north east. It is within the Fitzjohns Netherhall Conservation Area, the conservation area statement for which states it is in character sub area one and '*housing for the elderly, three storey red brick with protruding bays at first and second floor level'*. It has a tall chimney near the eastern corner of the roof and a plant room near the western corner. It has a large, square shaped central courtyard which provides outdoor access for the occupants of the 73 or so single bed units. The area is predominantly residential in character. Development comprises a mix of flats and detached housing. Mature trees are planted along the south eastern and north eastern perimeters of the property, and line part of the opposite side of Fitzjohn's Avenue. St Anthony's School and numbe 92 Fitzjohn's Avenue adjoin to the south east.

Enclose map showing the cell centre and adjoining cells:
Please refer to enclosed coverage plots.

Type of Structure *(e.g. tower, mast, etc):*		*Pole mounted antennas*	
Description: Installation of 6no. face mounted antennas, 4no. equipment cabinets and ancillary works including a meter cabinet.			
Overall Height:		14.8m to top of highest antennas	
Height of existing building *(where applicable):*		9m to top of main roof 14.8m to top of chimney 13m to top of plantroom	
Equipment Housing	PSU	PFP (2no)	CFC
Length:	0.7m	0.75m	0.8m
Width: :	0.8m	0.6m	0.66m
Height: :	1.8m	1.975m	1.77m
Volume: :	1.0m^3	0.89m^3	0.94m^3
Materials *(as applicable):*			
Tower/mast etc – type of material and external colour:	Antennas and support pole painted to match brickwork		

Equipment housing – type of material and external colour:	Steel equipment cabinets. Painted grey.

Reasons for choice of design:

There are 3no. main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signal(s), the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

In order for the base station to effectively provide coverage to the desired areas and fit in with the established network pattern, specific antenna orientations and heights, determined by the radio planners, must be achieved. Features of the surrounding area such as existing buildings and trees, referred to as “clutter” must also be cleared in order that they do not block the signals from the antennas. There are also limitations on how far from the antennas the equipment housing can be placed, as the quality of the signal deteriorates as the length of the feeder cables linking them increases.

In this case, four antennas have been located on a chimney along the south eastern elevation near the eastern corner of the building, with remaining two on a plant room along the north west facing elevation, near the western corner of the building. The antennas will all be pole mounted to the face of each chimney or wall, and colour matched to it. They will therefore be camouflaged, and combined with the height above ground level and the relatively narrow surrounding streets, their noticeability will be significantly reduced. The equipment cabinets are located on the roof near the northern corner, where they will not produce an impact on the street scene. The meter cabinet is proposed at ground level along the south western elevation. The size and amount of equipment has been kept to the minimum with which the site can operate effectively.

The use of a building is in direct compliance with local and national planning policy.

It is considered that this design is appropriate at this location, enabling the proposed installation to be assimilated into its environment without significant adverse impact on neighbouring properties or the wider visual amenity and maintaining the character and appearance of the conservation area.

4. Technical Information

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

As part of Telefónica'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

The mobile telecommunications device is an important tool for everyday life and the 3rd and 4th generation (3G and 4G) networks will enhance this function for all in the UK.

As stated in Paragraph 42 of the NPPF '*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*.' The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal, to enableTelefónica and Vodafone to provide 2G, 3G and 4G coverage to the surrounding area, will assist in achieving these objectives.

The 2G network will enable voice, text and limited data transference in the area, assisting businesses, commuters and home workers in their day to day business and reducing the incidence of dropped calls, one of the most frustrating elements of mobile phone usage.

The 3G technology brings new services, supporting and improving voice, text messaging and all other existing facilities. 3G provides greater bandwidth and means that operators can develop their range of services to include advanced applications. The 3G network carries voice and text and has high data capabilities that will also enable the transmission and receipt of visual media including real time video calls and internet access. High speed data transfer means customers can make video calls, download material or access data with the same or better levels of protection and speed than are available on a desktop computer.

4G (sometimes called LTE (Long Term Evolution)) is the next major enhancement to mobile radio communications networks. 4G technology will allow customers to use ultra-fast speeds when browsing the internet, streaming videos, or sending emails wherever they are. It also means faster downloads on the go. A study published by Ericsson in June 2012 entitled "Traffic and Market Report" forecasts that global mobile data traffic will increase by a factor of 15 between 2011 and 2017 http://www.ericsson.com/res/docs/2012/traffic_and_market_report_june_2012.pdf. To meet this demand and improve the quality of service, upgrades to existing base stations is required, along with new sites. 4G provides better download and streaming speeds.

The network is designed so that service will be seamless throughout 3G and 2G and 4G areas. Importantly, whether the customer is using voice or the more advanced data services, the connection will not be lost and access to data can continue.

The importance of mobile technology in the UK, and its contribution to the sustainability agenda is emphasised in a series of annual communication market reports published by OFCOM, 'The Communications Market' (http://stakeholders.ofcom.org.uk/market-data-research/market-data/communications-market-reports/cmr16/). The 2016 report states:

'*The communications market plays a crucial role in the lives of citizens and consumers, and the fast-paced nature of the market means that this role is ever-changing.*

We all need high-quality communications. In the modern world, a huge amount of our time is spent using communications services: for work, to stay in touch with family and friends, and in order to go about our daily lives. Our ability to access and use reliable mobile and broadband connections has become fundamental to the way we work and live, and to the ability of businesses of all sizes to thrive. For many people, internet connectivity is now as essential as gas or electricity, and access to traditional television, radio, fixed phone lines and postal services continue to remain important.

4G take-up has increased to 48% of UK adults (from 30% in 2015) while 4G mobile services are now available to 97.8% of UK premises. And 37% of fixed broadband connections are providing actual speeds of 30Mbit/s or more, up from 30% in 2014. In total, 86% of UK adults now have internet access at home. The greater choice of where and how to access the internet is driving greater use of online services. The smartphone, in particular, is becoming an ever more important device for many consumers, and take-up of this device has increased again this year. Seventy-one per cent of all adults now own a smartphone, up from 66% in 2015.

The growth of 4G has been rapid. 4G mobile services are now available to 97.8% of UK premises (outdoor coverage from at least one operator) in June 2016. 4G accounted for almost half of all mobile subscriptions (46%, 39.5 million connections) in Q4 2015, compared to 28%, 23.6 million, in 2014.'

The benefits to commerce, industry and the public in general are well recognised. The proposed installation will form an essential part of Telefónica's and Vodafone's networks. The site has been selected to fit as closely as possible to the grid pattern comprising existing and planned sites, as well as taking into consideration surrounding buildings and other obstructions. This reduces the interference generated by the site, the number of sites required to achieve coverage to the area and the height needed to achieve coverage, as well as ensuring effective coverage to the target area.

Coverage plots, demonstrating the need for the site for both operators, are attached. The plots show existing deficiency in the area for 3G coverage, and the significant improvement predicted once the application site is integrated into the networks, represented by the magenta shading. It is clear that the proposed installation will fill a substantial coverage gap in this area of Camden. 3G plots are used because the higher frequency generally has a smaller footprint than that of the lower frequency 2G and 4G; if a site can be demonstrated to be satisfactory for 3G, it will also be acceptable for 2G and 4G.

The proposed installation will serve both the existing users of the services and the predicted increase as usage becomes more widespread. It will serve the need for improved coverage and data transfer speeds resulting from the rapid growth of the number of people that now own and use mobile phones including smart phones.

3G and 4G mobile communications will enable substantial benefits to users in terms of providing a "virtual office" with facilities including e-mails, video conferencing, data transfer etc. There are significant potential benefits in terms of reduced car commuting, contributing to the sustainability agenda.

It has already been discussed that the Government places great emphasis on the benefits of mobile telecommunications to modern life. With this in mind, the proposal will provide a high standard of coverage to commercial and private users working, shopping and living in the locality and to the road, rail and pedestrian networks of the area.

It is to provide these types of services that the networks are being developed. As detailed above, there is a clear need for the proposed development.

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 planning 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)

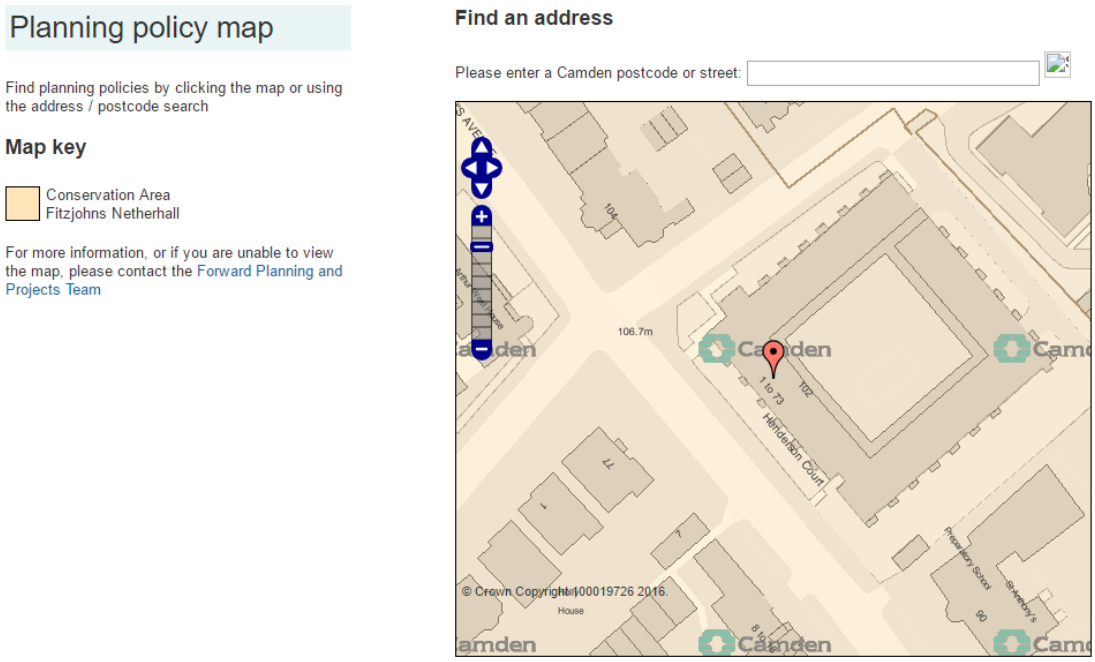
Site type	**Site Name, Address, NGR**	**Reason for not Choosing**
Roof top	Arthur West House, 79 Fitzjohns Avenue, NW3 6PA NGR 526429/185515	Despite numerous attempts, no response was received from the site provider. The operators cannot compel a response from the site provider and the need for a site remains. Without permission from the site provider, this option could not be progressed and it was discounted on this basis.
Roof top	Madresco House Akenside Road NW3 5BT NGR 526666/185109	As above.
Roof top	11 Lyndhurst Tce NW3 5QA NGR 526631/185330	As above.
Roof top	63 Fitzjohns Avenue NW3 6PE NGR 526537/185313	As above.
	102 Fitzjohns Ave NW3 6NR NGR 526498/185509	As above.

The operators have been searching for a site in this area of Camden for years. When Camden Council offered some of its property stock, it was immediately clear that Henderson Court was ideally located to fill a coverage gap. Given an appropriate design could be achieved which both met coverage objectives and maintained the character and appearance of the conservation area, no further searches were undertaken.

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

N/A

Land use planning designations:



The above map is an extract of the LPA's LDF policies map 2016. The red flag indicates the application site. The extract confirms the site is within the Fitzjohns Netherhall Conservation Area. No other designations affect the site.

Additional relevant information (planning policy and material considerations):

VISUAL IMPACT AND APPEARANCE

The conservation area statement confirms that one of the noted views in character sub area one, where the application site is located, is along Fitzjohn's Avenue, both directions. In order to demonstrate the minimal impact of the proposal on views, a series of photomontages has been produced and included with the application. Reference to these clearly shows that the antennas will blend well with their brick backdrop, and this camouflage technique assists in their minimal impact on views. They will not protrude above the roof line, thus preserving that important aspect of the conservation area. From some perspectives they won't be seen at all due to intervening buildings and trees. From other perspectives, the antennas will certainly be visible, but visbility does not necessarilty equate to harm; this is reinforced by the low impact design

PLANNING POLICY

Local planning policy

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

The current adopted development plan for Camden Council relevant to the proposal comprises:

- Camden Local Development Framework Camden Core Strategy 2010 – 2025 (2010)
- Camden Local Development Framework Camden Development Policies (2010)

- Fitzjohns Netherhall Conservation Area Statement (undated)
- Camden Planning Guidance Design (2015)
- Camden Local Plan (Submission Version 2016, subject to modifications)
- London Plan 2016

Camden policies

There are no specific policies relating to the type of development proposed in this application. However, Policy CS14 Promoting high quality places and conserving our heritage from the Core Strategy and Policy DP 24 of the Development Policies document (Securing High Quality Design) which requires a high standard of development, and policy DP 25 (Conserving Camden's Heritage) which requires development to preserve or enhance Conservation Areas and listed buildings are relevant.

The camouflaged nature of the proposal, utilising colour coded face mounted antennas and small equipment cabinets set back from the building edge, ensure its nature is acceptable. Scale is the size of a building or structure in relation to its surroundings, or the size of parts of a building/structure or its details, particularly in relation to the size of a person. In relation to this, it is considered the proposal represents a highly satisfactory addition to existing features without being overbearing on surrounding buildings, the road network or views from the public domain including the conservation area. Its small scale in relation to the host building means it will not be particularly noticeable from public areas nor impact upon the street scene. The location on a building is an entirely suitable one for the electronic communications infrastructure proposed. Again, the colour coded camouflaging of the antennas and the small equipment cabinets combine in a simple unfussy design to ensure the character and appearance of the conservation and local distinctiveness are maintained.

The Conservation Area Statement has little of relevance in terms of the proposed development. It notes that insensitive roof alterations can harm the character of the roofscape, but this is in relation to mid to the late Victorian period, which does not apply to Henderson Court, a more modern addition to the area. The Statement's guidelines for new development outline that it should enhance the conservation area and respect existing features. The proposal will preserve the conservation area, and clearly respects existing features with its camouflaged design.

One of the key messages from Chapter 4 dealing with alterations amongst other things, is that '*Alterations should always take into account the character and design of the property and its surroundings*.'. The sympathetic design has achieved this.

Camden's website advises limited weight is being given to the Local Plan, which is currently under examination. Paragraph 2.6 sets out key priorities for delivering growth, including *'securing the infrastructure and services to meet the needs of our growing number of residents, workers and visitors. We have identified our infrastructure needs in the schedule in Appendix 1. This includes transport, utilities, education, health, open space, emergency services needs and digital infrastructure requirements.*' Appendix 1 in turn sets out in relation to Digital Connectivity that the Council will aim for *'improved internet access through the acceleration of high speed connectivity, including public wireless systems',* which includes the development proposed in this application. Paragraph 2.52 also recognises the need for adequate infrastructure to support growth, including digital infrastructure.

London Plan (2016)

The theme of socio-economic benefits is emphasised in The London Plan – the Spatial Development Strategy for London Consolidated with Alterations since 2011 (March 2016).

The London Plan continues to set out the spatial development strategy for Greater London, in which it discusses the importance of ensuring that robust infrastructure is in place to support better connectivity and economic prosperity. Indeed, the Mayor wishes to encourage broad-based growth and continues to support the telecommunications industry towards playing its part in a thriving, resilient and diverse capital city. A range of overarching policies from the London Plan are relevant to telecommunications development, whereby the benefits of mobile connectivity should be seen as an important material consideration, in contributing to the places and spaces in which Londoners live, work and visit. In this respect it is clear that telecommunication development is an integral component towards the delivery of the Mayor's vision and objectives as set out in the London Plan.

In Paragraphs 1.38-1.41 'Ensuring the infrastructure to support growth', the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to secure its long-term growth.

It is considered that the Telefónica and Vodafone networks are an integral element in securing the Mayor's vision. Not noted by the Local Authority, Chapter 4, "London's Economy", contains a policy which is directly relevant to the installation and upgrade of electronic communication base stations. This is Policy 4.11, 'Encouraging a Connected Economy', which states:

'POLICY 4.11 ENCOURAGING A CONNECTED ECONOMY

Strategic

A The Mayor and the GLA Group will, and all other strategic agencies should:

a facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive connectivity meeting the needs of small and larger enterprises and individuals (emphasis added*)*

b support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits'.

It is clear that the unfussy well-designed faced mounted colour coded low impact development proposed in this application is entirely consistent with this strategic policy, contributing in a sustainable fashion to London's connectivity and digital economy future.

Conclusion to local planning policy section

The proposal complies with local policy to the extent that it is relevant. The proposal is sympathetically designed, ensures infrastructure sharing, would enhance the provision of local community facilities and services and would preserve heritage assets.

National Planning Policy Guidance

National Planning Policy Framework (2012) (NPPF)

The NPPF, which came into force on 27 March 2012, has replaced PPG8 in terms of national policy specifically relating to electronic communications development.

Paragraph 14 states '*At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. …*

'For decision taking this means:

- *approving development proposals that accord with the development plan without delay; and*
- *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- *specific policies in this Framework indicate development should be restricted.*

Unless material considerations indicate otherwise.'

Included within the core planning principles to be taken into account in paragraph 17 are the following relevant points:

- *planning 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. …; (emphasis added)*

- *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*

- *support the transition to a low carbon future in a changing climate, …;*

- *conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;*

Paragraph 21 advises LPA's to '*plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries*;' and paragraph 29 recognises that '*Smarter use of technologies can reduce the need to travel*.' The proposed site in this application will facilitate new 4G technology (as well as enhanced 2G and 3G coverage), allowing for home working and can reduce the need to travel, thus contributing to the sustainability agenda, as previously mentioned.

Leading on from this, Section 5 of the NPPF addresses supporting high quality communications infrastructure. Paragraph 42 sets out 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*.'

Paragraph 42 emphasises that '*advanced, high quality communications infrastructure is essential for achieving sustainable economic growth'*. It sets out that high speed broadband and other communications networks, such as the proposal and its role in Telefónica's and Vodafone's wireless data networks in Camden, play a vital role in enhancing the provision of local community facilities and services. This central plank of government planning guidance for communications infrastructure is clearly supportive of the applicants' proposed development for high quality communications in the area surrounding the application site.

Paragraph 43 advises that *'local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They 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 proposed installation is located on a building in accordance with paragraph 43. Regardless, as has been demonstrated throughout this statement, the proposed equipment has indeed been

sympathetically designed and camouflaged, utilising face mounted and colour coded antennas such that their impact will be minimal.

In terms of alternatives, regardless of the advice in the NPPF, details of alternatives investigated are provided in Part 5.

Paragraph 45 specifically requires applications for telecommunications development should be supported by the necessary evidence to justify the proposed development. It says that this should include:

- *the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site; and*

Please refer to Community Consultation in Part 2 above for details of who was consulted and the responses received.

- *for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.*

The site is an existing building. The site has been designed to be fully compliant with the precautionary ICNIRP guidelines, as noted on the accompany drawings.

An ICNIRP certificate is included with the application.

Paragraph 46 clarifies that LPA's '*must determine applications on planning grounds*. *They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure.'*

In terms of heritage assets, the NPPF also advises on conserving the historic environment. It sets out how local planning authorities should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. At paragraph 132 it states that '*when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be'*. Paragraph 135 goes on to state that '*in weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'*.

The proposed development will result in less than substantial impact on the character and appearance of the conservation area. The NPPF then sets a requirement for a balancing exercise – if there is a harm identified, can it be outweighted by other benefits or in other words the need for the development, its technical requirements and the availability of an alternative site to be weighed against any visual impact, which is a requirement for the determination of telecoms applications. The degree of harm would have to be balanced against the need for the installation and the likelihood of being able to mast share or find a better location. With regards to the installation of equipment cabinets on the roof, they are not considered to cause any harm. They would be set back from the roof edge and not visibale from ground level. The antennas on the chimney would undoubtedly have some impact.

However, this impact has to be balanced against the technological need for improved mobile connectivity. The proposal would allow two operators to use and share the apparatus to provide improved 2G and 3G coverage and also to provide 4G coverage. Considerable weight should also be afforded to the proposed improvements to the type and extent of mobile phone coverage in the locality particularly as paragraph 42 of the NPPF 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*".

The limited impact of the antennas upon the character and appearance of the conservation area has to be weighed against the fact that they would be positioned in such a way that they will not protrude above the height of the chimney and plant room, and that they would all be essentially confined to those two contained areas. The proposed antennas would be located on an exsiting chimney and plant room where passers-by are already used to seeing substantial structures.

Therefore, whilst the proposal would have some impact upon the character and appearance of the area, there are no better available alternatives, and we do not consider that such an impact would be significant. In any event, any such impact would be outweighed by the telecommunication benefits arising out of the proposal, as demonstrated by the submitted coverage plots, which show the proposed base station is necessary to improve vital networks that provide public services. The service provided by the operators is in the public interest and is in very high demand. In the UK there are now more almost 84 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage, as already outlined. The public interest of the system is clear from the considerable benefits that will flow and it makes a significant and major contribution towards sustainable objectives and public connectivity.

In terms of other public benefits which contribute toward outweighing the less than substantial impact of the proposal, the revenue from the proposal will go to Camden Council on a wider scale to help fill the housing funding gap left by central government spending cuts, thus ensuring improved social impact in general and associated with improved connectivity.

Overall, it is clear from the balancing exercise required by the NPPF that the limited impact of the proposal will be truly outweighed by the significant and far reaching public benefits.

Given the proposal will maintain the character and appearance of the conservation area and will not compromise the contribution the conservation area makes to the area, nor the area's local distinctiveness, it is considered to comply with the requirements of this aspect of the NPPF.

In the applicants' opinion, the proposed development accords fully with the design guidance contained in section 7 'Requiring good design' of the NPPF. In this regard, the installation of a shared installation with face mounted and colour coded camouflaged antennas is of itself an innovative design solution that is an entirely suitable development given the context of the site.

The proposal therefore represents good design and less than substantial impact on the conservation area and it is supported by the guidance contained 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).'*

Thus the requirements of the fourth core planning principle under paragraph 17 '*always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings*;' are achieved.

The limited impact is considered to be outweighed by the provision of high quality well designed modern communications networks, that will deliver social, environmental and economic benefits in the wider public interest.

The proposal, a well designed, camouflaged and shared installation which will not harm the conservation area, is in complete accordance with Part 5 of the Delivering Sustainable Development section of the NPPF as well as those sections dealing with design and heritage. It will allow the operators to provide coverage, which will enable access to services in the wider public good which support ways of working which deliver wider planning, sustainability and quality of life benefits, and is in complete accordance with the NPPF.

Other Relevant National Policy

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'. This proposal forms a part of this greater drive to address the deficit in mobile phone coverage and capacity.

London Infrastructure Plan 2015

The London Infrastructure Plan 2015, further emphasises the need for improved connectivity in London. The aim of the Infrastructure Plan is to enable for fast, ubiquitous access to the internet from mobile and fixed devices. As cited in Chapter 16 of the Plan, the London Mayor's Office supports an economically viable mix of technologies including fibre broadband, mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. This document is supported by the report 'Raising London's High Speed Connectivity to World Class Level'. As detailed within these documents, Digital Connectivity is now considered the fourth utility. Internet access not only affects the productivity of businesses and proves essential to the future growth of many firms, it is also vital for many residents to take part in modern society (as more services move online).

The Mayor's Office aims to work with central government and London's local authorities to ensure that strategic communication networks are enabled rather than inhibited by the planning and other regulatory systems (whilst ensuring the utility works themselves are properly managed). The O2 networks are integral elements in securing the Mayor's vision for the delivery of modern communications networks across London.

The proposed development, which will form an integral part of the applicants' networks, is precisely the type of high-speed digital infrastructure that the government is seeking to support as part of the presumption in favour of sustainable development. Moreover, the proposal will deliver social, economic and environmental benefits by providing 2G,3G and 4G services to the residents, businesses and those travelling through this area of Camden. More specifically, the application proposal is entirely consistent with and shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

Summary

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

A simple design solution is proposed to meet coverage objectives, mitigate visual impact and prevent harm to the local environment. In particular the character and appearance of the conservation area would be protected, balancing environmental and planning considerations in the wider public interest.

The proposed development is compliant with the relevant policies from the NPPF and the local development framework, as outlined within this supporting statement.

The proposal is fully compliant with ICNIRP guidelines and declaration of compliance has been provided.

Given these factors, there is no material reason to refuse this application.

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