SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Chester Court	Site Address:	Chester Court, Lissenden Gardens, London, NW5 1LY
National Grid Reference:	E528376 N185755		
Site Ref Number:	CTIL_234861	Site Type:	Macro

1.1 Background

The operator has 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 Chester Court will enhance the 2G, 3G and 4G coverage for Telefónica (trading as O2) customers in the surrounding area. Chester 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:	**Yes**/No
Date of pre-application contact:	20/12/2016
Name of contact:	Chief Planning Officer
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 on 21 December 2016. The Council requested a fee of £960. Whilst 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.	

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. Details of the proposal including drawings were sent to the following parties by email on 20 December 2016;

- Highgate Ward Councillors
  - Councillor Sian Berrry
  - Councillor Sally.Gimson and
  - Councillor Oliver Lewis
- Keir Starmer MP for Holborn and St Pancras Constituency

A voluntary site notice with details of the proposal was on a lamppost outside Chester Court in Lissendon Gardens. In addition, the residents of Chester Court have been notified of the proposal by Camden Council.

Summary of outcome/main issues raised (include copies of relevant correspondence):

Several responses were received citing issues relating to:

- Health risks;
- Impact on building;
- Proximity to schools and residential properties;
- Damage to roof;
- Property values;
- Security.

The proposal's sympathetic and camouflaged design would ensure that the impact on the building and surrounding area is minimised. It should be highlighted that base stations need to be located in areas where people use mobile devices as they cover a limited geographical area, ie where people live, work and play which inevitably means that in built up areas some sites such as the proposal site will be in residential areas or close to schools. The proposal is designed to be in full compliance with the requirements of the radio frequency (RF) guidelines of the International Commission on Non-Ionizing Radiation (ICNIRP) for public exposure. An ICNIRP compliance declaration has been provided with the application. In relation to security, the applicant will obtain the necessary permissions from the Landlord prior to any visits and will make use of on-site and existing internal routes during construction. It is likely that once built, the site will be visited infrequently for maintenance purposes only. With regards to impact on the roof, the proposed antennas will be pole mounted on steel grillage within GRP shrouds and the cabinets will be placed on a free standing base. No damage would be caused to the roof. In any case, prior investigations would have been undertaken at the time of the design visit to ensure the roof is structurally able to support the apparatus without causing any issues. In relation to property values, this is not a material planning consideration as the planning system operates in the long term public interest. It does not exist to protect the interests of one person or business against the activities of another. The basic question is whether the proposal would unacceptably affect the amenity and existing use of land and buildings which ought to be protected in the public interest, not whether owners or occupiers of neighbouring or other existing properties would experience financial or other loss from a particular development. We are happy to provide copies of correspondence upon request.

School/College

Location of site in relation to school/college *(include name of school/college):* The following education or childcare establishments have been identified in close proximity of the application site; • Gospel Oak Primary School, Mansfield Road, London, NW3 2JB, located approximately 140m from the application site; • Parliament Hill School, Highgate Road, London, NW5 1RL, located approximately 160m from the application site; • William Ellis School, Highgate Road, London, NW5 1RN, located approximately 270m from the application site.
Outline of consultation carried out with school/college *(include evidence of consultation):* Details of the proposal were emailed to the Head teachers and Chair of Governors of the above schools on 20 December 2016.
Summary of outcome/main issues raised (include copies of main correspondence): A response was received from the Headteacher of William Ellis School objecting to the scheme.

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		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	**No**
Date served:	07/03/2017 (Article 13 notice served)	

3. Proposed Development

The proposed site:
The application site is a five storey red brick residential block, with another floor in the mansard roof, fronting Lissenden Gardens. The building has casement windows and balconies. The roof is flat with two plant rooms located central to it. Surrounding the subject site are predominately residential properties with some commercial uses and schools. To the north, south and east of the application site are residential properties with pockets of commercial units. To the west is Hampstead Heath and associated uses. Beyond Hampstead Heath is Gospel Oak station. The application site is part of the Dartmouth Park Conservation Area.

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

Type of Structure *(e.g. tower, mast, etc):* Pole mounted antennas behind GRP screens	
Description: The proposal involves the installation of 6no. antennas within 3no. glass-fibre reinforced plastic (GRP) enclosures, 3no. equipment cabinets and ancillary works thereto on the roof of Chester Court, Lissenden Gardens, London, NW5 1LY	
Overall Height:	21.3m
Height of existing building *(where applicable):*	18 metres AGL
Equipment Housing: Flexi Rack x2	
Length:	0.750 Metres
Width:	0.600 Metres
Height:	1.980 Metres
Equipment Housing: PSU	
Length:	0.700 Metres
Width:	0.820 Metres
Height:	1.800 Metres
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Antenna enclosures made of glass-reinforced plastic colour coded to match building
Equipment housing – type of material and external colour:	Steel coloured grey

Reasons for choice of design, making reference to pre-application responses:
The proposed design has been influenced by the need to provide 2G, 3G and 4G coverage for Telefónica in this area of Central London. 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. The extent of development has been kept to its minimum. The proposed antennas will be contained within GRP enclosures to minimise visual impact. The antennas are required to emit the necessary radio signals. They will be installed in pairs within three GRP shrouds on the eastern, western and south western corners of the main roof respectively. The antennas will be supported by 2 metre poles

fixed to steelwork on the roof. The GRP enclosures will be colour coded to match the external appearance of the building. The overall height of the antennas is the minimum required to meet the technical requirement of the site. It should be highlighted that the antennas need to be installed at a height that clears the roof and surrounding clutter to allow for the effective propagation of radio signals. The proposed antenna height would ensure that the required radio coverage is provided to the target area without clipping the roof.

The proposed equipment cabinets measure less than 2.5m^3 in volume and will be set back from the building edge. The cabinets will enable the required signals to be generated. They will be painted grey and their siting away from the roof edge would ensure they are not visible in street views.

The omission of any one of the proposed components would either render the base station inoperable (in the case of the equipment cabinet) or would significantly reduce the coverage provided from the site (reduced antenna height) to the extent the operator may need to develop a further base station in the area to meet the coverage objectives. This would be inconsistent with government guidance, as set out in National Planning Policy Guidance (NPPF), which seeks to keep the numbers of base station sites to the minimum.

The size of all components has been kept to the minimum required for efficient operation of the site and the overall scale of the proposals is considered wholly appropriate in the context of its immediate surrounds.

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 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 Telefónica 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.	**Yes**	No

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.		

4. Technical Justification

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

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

The proposed site is required to provide 2G, 3G and 4G coverage for Telefónica in this area of London.

2G technology is predominately used for making calls and sending text messages, whilst 3G enables access to internet services more effectively through a mobile device. 4G is the fourth generation of mobile phone technology and follows on from 2G and 3G. 4G services are intended to improve mobile broadband services into the future enabling ultra-fast speeds when browsing the internet and greater capacities of data to be shared via mobile technologies.

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.'

In this respect, the network infrastructure development progressed by the operator in this application is largely determined by consumer demand. The enhanced network coverage would deliver social, economic and environmental benefits to the residents, businesses and services in the area.

Coverage plots, demonstrating the need for the site, 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.

Details regarding the general operation of the Telefónica 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.

5. Site Selection Process

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

Site	Site Name and address	National Grid Reference	Reason for not choosing

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

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 Chester 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.

Land use planning designations

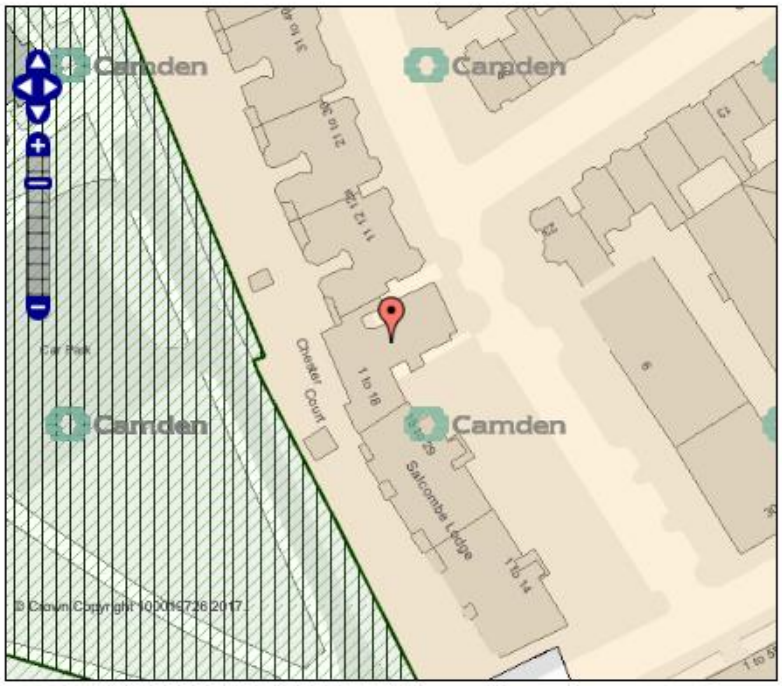
The below map is an extract of the LPA's LDF policies map 2016. The red flag indicates the application site. The extract confirms the site is within the Dartmouth Park Conservation Area. No other designations affect the site. The nearest listed building is a Grade II listed sewer vent pipe at the Gordon House Road entrance to Hampstead Heath. Hampstead Heath is situated to the west of the application site and is designated as Metropolitan Open Land (MOL).

Find planning policies by clicking the map or using the address / postcode search

Map key

Conservation Area
Dartmouth Park

For more information, or if you are unable to view the map, please contact the Forward Planning and Projects Team



The impact of the development on the above land use designations together with any other material planning considerations will be considered in more detail in the following sections.

Additional relevant information (planning policy and material considerations):

National Planning Policy
It should be highlighted that any comments made in this section assessing the proposal against either national or local planning policies should be read in conjunction with the information contained within the preceding sections of this statement.

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. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;*

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

- *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;*

In this instance, the proposal would aid economic development by providing enhanced services to users in the area. The sympathetic design of the proposal comprising of masked antennas would be in keeping with the building and surrounding area and in line with the above core principles.

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 installation will facilitate enhanced 3G and 4G coverage allowing for home working and a

potential reduction in the need to travel, thus contributing to the sustainability agenda. The proposal therefore complies with this aspect of NPPF.

5 - Supporting high quality communications infrastructure

Pertinent to telecommunications development section 5 of NPPF sets out the Governments general overview regarding 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*.'

The enhanced services that would be provided by the proposal would contribute to the above objective and towards the government's agenda to increase connectivity required to boost economic prospects of urban areas such as this one.

Paragraph 43 advises that '*In preparing Local Plans, 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.'*

In line with this paragraph, the proposal utilises an existing building to provide multiple technology coverage. It would allow for the technical objective to be achieved with the minimal level of visual or environmental impact. As noted previously, visual impact has been minimised by using a sympathetic and camouflaged design.

Paragraph 44 emphasises that LPAs '*should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development*.' It sets out that LPA's '*should ensure that:*

- *they have evidence to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*

The European Commission has issued a directive (2004/108/EC) governing all forms of electronic equipment regarding the interference that such equipment produces and, in turn, its immunity to interference from outside.

Any equipment compliant with that directive, such as that proposed in this application, is unlikely to suffer or cause interference. However, if there is a complaint of interference to domestic radio and television, in the first instance the BBC will assist, via the BBC Help Receiving TV and Radio web site at: http://www.bbc.co.uk/reception. If, following investigation, there is evidence of interference, the operator will ensure any issues associated with their equipment are addressed. For any other types of interference, Ofcom will investigate.

Finally, 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.'.*

The application is accompanied by an ICNIRP declaration which confirms that the proposal conforms

with the International Commission guidelines for public exposure.

It is considered that the proposal is fully in compliance with National Planning Policy guidance.

In terms of heritage assets, Paragraphs 126 to 141 contain the heritage specific policies in the NPPF which seeks to conserve and ensure enjoyment of 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'*.

The latter is echoed in paragraph 134 which states that *"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."* Similarly, paragraph 135 states 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 outweighed by other benefits. 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 visible from ground level. The antennas with the GRP enclosures would undoubtedly have some, albeit minimal, impact.

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 GRP scheme in this instance would preserve the character and appearance of the conservation area and would not cause harm to any other heritage assets. The limited impact on the building and surrounding area would be outweighed by the public benefits resulting from the enhanced services to the area.

The limited impact of the GRP enclosures upon the character and appearance of the conservation area has to be weighed against the fact that they would reflect the height of existing plant on the rooftop; plant which is considered acceptable.

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 operator 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.

<u>London Plan (2016)</u>

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 network is 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.

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 Telefonica network is an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposal is entirely consistent with and shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

The proposed development, which will form an integral part of Telefónica's 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 3G and 4G services to the residents, businesses and services in this area of Central London.

Local Planning Policy

Section 70 of the Town and Country Planning Act 1990 requires planning applications 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 Camden development plan is made up of (together with the Mayor's London Plan) a number of documents with the Camden Core Strategy 2010 – 2025 and Camden Development Policies 2010-2025 being the key documents supported by various types of detailed information in the Camden Planning Guidance and other documents about local and sub-regional matters.

The development plan has no policy specifically related to telecommunications development therefore the Applicant has reverted to guidance contained in the NPPF.

Other relevant policies include Policy CS14 "*Promoting high quality places and conserving our heritage*" from the Core Strategy and Policy DP24 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.

The camouflaged nature of the proposal ensures 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. The small scale in relation to the host building means the proposal will not appear out of place. The location on a building is an entirely suitable one for the electronic communications infrastructure proposed. Again, the camouflaged screening 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.

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.

It is considered that the proposal is fully in accordance with the above policy as will be considered in more detail in the next section under 'Siting and Appearance'.

Siting and Appearance

In making an assessment of the siting and appearance of the proposal and associated visual impact, regard should be had to information previously provided in Part 3 regarding the site, surrounding area and justification for the design plus the relevant planning policy. It is considered that the planning assessment of this case should concentrate on whether the visual impact of the proposed scheme is significant as to outweigh other material planning matters. It should also be ascertained as to whether there is a need for the base station and whether other alternative sites exist on which the apparatus could be installed. The proposal should also be reviewed against the up to date planning policy

regarding telecommunications development.

With regards the design, as noted previously, the size of all components has been kept to the minimum able to structurally support the technically preferred antennas and radio equipment. The antennas would be contained within GRP enclosures to minimise visual impact. Taking into account the surrounding clutter and operational needs, the antenna height has been kept to its technical minimum to allow for adequate coverage to the target area and not to be overbearing in the skyline. Furthermore, the proposal has multiple technology capabilities which would enable three technologies to be provided from a single installation. Therefore, progressing this scheme will eliminate the need for additional telecommunications sites in the area. In this regard and when balanced against the other material planning matters, it is considered that the overall appearance of the proposal is acceptable.

The level of visual impact can be assessed in the photomontages numbered 234861.1.1 to 234861.5.1 enclosed with the application which have been produced by an independent specialist designer to illustrate the impact of the proposal on the building and surrounding area.

Photomontage 234861.1.1 shows the existing and proposed views of the application site looking south from Lissenden Gardens from approximately 48 metres. Only one GRP enclosure fronting the building will be visible from this view point. The same GRP enclosure would be visible in Glenhurst Avenue as illustrated on photomontage 234861.2.1. Two GRP enclosures would be visible when looking north west from Gordon House Road and east from Parliament Hill Lido as demonstrated by Photomontage 3.1 and 5.1 respectively. Similarly, when looking north east from Hampstead Heath, two GRP enclosures will be visible although a large bulk of the GRP shroud fronting the building would be screened by the mansard roof. It is clear from the photomontages that the equipment cabinets will not be visible from the ground and therefore will have no impact on the surrounding area. It is acknowledged that the GRP enclosures will be noticeable from various public vantage points, however it is considered that the enclosures will be viewed as part of the built form in this area in conjunction with the existing plant rooms on the building and those of neighbouring properties. It should be appreciated that the impact on the building and area would be lesser than if unmasked pole mounted antennas were to be used. It should further be highlighted that visibility as in this case or a development's height and design does not automatically result in an overwhelming adverse harm. As mentioned previously, the proposed antenna height is required to clear the roof inorder to avoid clipping and to clear surrounding clutter to enable the antennas to function effectively. A height reduction would compromise the coverage from the site.

The application site is situated within a conservation area close to its boundary. The Conservation Area Appraisal and Management Statement has little of relevance in terms of the proposed development. It states that the most noticeable characteristic of the Lissenden Gardens area is "the larger scale of development with the predominant built form being higher and denser than other parts of the conservation area". In this regard, it is the Applicant's view that the siting of the proposal in this part of the conservation area where buildings are higher and denser than elsewhere would have the least contrast with the surrounding area. In addition, the siting of Chester Court close to the boundary of the conservation area, means that some views of the proposal will be out from the conservation area into areas which the Council considers to have less visual/historic amenity. We consider that this should be given some weight as the impacts on the wider conservation area will obviously be less than if the proposal were to be located central to the conservation area. Whilst it is not considered the development will 'enhance' the environment, its siting close to the edge of the conservation area and camouflaged design assists in minimising the impact of the installation to the extent it can be said to 'preserve' the environment.

With regard to the impact on the closest heritage asset apart from the conservation area, it is not considered that the proposal would have any impact on the Grade II listed sewer vent pipe at Hampstead Heath, its setting or views to and from the asset given its low height and screening from surrounding natural vegetation.

In relation to Hampstead Heath, it is noted that it is the largest open space in the borough designation

as Metropolitan Open Land where the council aims to preserve and enhance its historic, open space and nature conservation importance and its surrounding area as stipulated by Core Strategy policy CS15. It is acknowledged that the two GRP enclosures at the rear of the building will be visible in views from Hampstead Heath however, it is believed that these views would be limited to the immediate area as illustrated by photomontage 234861.5.1. Long distance views from the Heath onto the site would be limited by wooded areas within the grounds of Hampstead Heath.

In relation to the need for the development, it has been highlighted that the proposed installation is required to provide 2G, 3G and 4G network coverage for Telefónica to this area. The public benefits of the development in providing enhanced coverage to the area should be seen as a material planning consideration. As highlighted in preceding sections of this statement, the Government fully supports the growth and provision of a modern telecommunications infrastructure. It is considered that the wider public benefit of providing enhanced services to residents and businesses in the area is sufficient to outweigh the limited impact on the surrounding area. The application site has been identified as the optimum available option that would provide the required network coverage to the intended area whilst minimising the environmental impact on the surrounding area.

In summary, the proposal is sympathetically designed and camouflaged and would be sited on an existing building. It would provide enhanced services to users in the area improving mobile connectivity. The proposal site is considered the optimum available option in the area that would provide the required coverage with the least impact on the surrounding area. An ICNIRP compliance certificate is attached as part of this submission, as required by NPPF paragraph 45. When balanced against all material planning considerations, it is the Applicant's view that any impact on the surrounding area would not outweigh the other material merits of the proposal as well as the benefit of improved network coverage to the public. It is considered that the proposal strikes a good balance between environmental impact and operational considerations and is fully in accordance with National Planning Policy guidance and the Council's Development Plan.

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