SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Troyes House	Site Address:	Troyes House, Lawn Road, London, NW3 2XT
National Grid Reference:	527575, 185042		
Site Ref Number:	148391	Site Type:[1]	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 Troyes House will enhance the 2G, 3G and 4G coverage for Telefónica (trading as O2) and Vodafone customers in the surrounding area. Troyes House 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.

1.2 Planning history

Application 2016/4803/P for the '*Installation of 6no. antennas behind a glass reinforced plastic (GRP) screen with ancillary works*' on the rooftop plant room was refused on 31 October 2016 due to inappropriate siting, excessive scale and bulk and unsympathetic functional design resulting in a highly visual prominent and incongruous development.

A scheme involving the '*Installation of 6no. antennas behind 3no. GRP screens and ancillary works*' on the main rooftop of the building has been proposed as an alternative to the 2016 application. This application is for the alternative scheme.

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:	10/03/2016
Name of contact:	Chief Planning Officer

[1] Macro or Micro

Summary of outcome/Main issues raised:
N/A. As the scheme is a variation of the original proposal, no additional consultation was undertaken.

Community Consultation

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

Outline of consultation carried out:
Consultation was undertaken on 10 March 2016 with the Gospel Oak Ward Councillors, Councillors Blackwell, McCormack, Revah, and with the Member of Parliament for the area, Keir Starmer.

A voluntary site notice was displayed outside Troyes House on 8 August 2016.

As the scheme is a variation of the original proposal, no additional consultation was undertaken.

Summary of outcome/main issues raised:
10/03/16 - Email received from Councillor Blackwell advising the proposal is fine with him
15/03/16 - Email received from Councillor McCormack advising she is interested to see the results of the consultation with residents.

Issues raised in the 2016 application (responses in brackets) included health (the proposal is ICNIRP compliant), impact on conservation area (the antennas are screened behind GRP enclosures which will be colour matched to the brick façade of the building), need (plots demonstrate need), procedural issues, impact on amenity (there will be no impact on light, shadowing, noise, etc), Council's interest in the land (see para 1.1), development which is less harmful has been refused in this conservation area (each application will be assessed on its merits), impact on local wildlife (there will be no impact on local wildlife), disproportionate (the proposed three GRP boxes match the existing plant in terms of façade and height, and will have a smaller footprint), better sites (see section 5) and inappropriate materials (GRP is not inappropriate in the context of a functional building constructed in the 1950's after the war).

School/College

Location of site in relation to school/college*:*

The following educational establishments were identified for consultation in relation to this proposal:-

- St Dominic Primary School, Southampton Road, London, NW5 4JS is located approximately 285m away from the application site.
- Abacus Belsize Primary School, Hampstead Town Hall, London, NW3 4QP is located approximately 260m away from the application site.
- Three Acres Pre-School, 29-31 Parkhill Road, London, NW3 2YH is located approximately 200m away from the application site.
- Polkadots Nursery, Blackfriars Parish Hall, Southampton Road, London, NW5 4JS is located approximately 290m away from the application site.

As the scheme is a variation of the original proposal, no additional consultation was undertaken.

Outline of consultation carried out with school/college*:*

Consultation letters were issued to the Head Teacher and Chair of the Governing Body for all schools listed above and to the Managing Director for the Pre-school. Consultation was issued on 10 March 2016.

Summary of outcome/main issues raised:
No responses have been received.

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:	07/04/2017 (Article 13 notice served)	

3. Proposed Development

The proposed site:
The application site is a Troyes House is a four-storey L-shaped brick building located at the junction of Lawn Road and Upper Park Road. There is an existing plantroom on the rear of the building roof which rises above the main roof level. The area around the site is residential in character with properties or residential roads on all sides. The building is located within the Parkhill 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: Installation of 6no. antennas behind 3no. GRP screens and ancillary works.		
Overall Height:		14.9m to top of GRP enclosures
Height of existing building *(where applicable):*		14.8m (roof level of plant room)
Equipment Housing:		N/A
Length:		N/A
Width:		N/A
Height:		N/A
Materials*:*		
Tower/mast etc – type of material and external colour:	GRP enclosure with a brickwork finish to match the variegated colour and appearance of the existing brickwork façade of the building and plant room.	
Equipment housing – type of material and external colour:	Steel coloured green. Can be painted any colour or combination of colours.	

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 and Vodafone 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 north eastern, central and south eastern corners of the main roof respectively (ie the long side of the L-shape of the building). 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 will be located within the building and are not part of the application for planning permission.

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 and Vodafone Ltd operate their networks 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 and Vodafone UK's networks, 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.	**Yes**	No

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 and Vodafone 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.

The proposed site would provide 2G, 3G and 4G coverage for Telefónica and Vodafone. 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.

To meet this demand and improve the quality of service, additional base stations or upgrades to the equipment at an existing base station may be needed. As there are no existing sites in the area which can be upgraded, a new installation is proposed in this instance.

Coverage plots, demonstrating the need for the site, are attached. The plots show existing deficiency in the Belsize and Maitland Park area for 3G coverage. The cellular region subject to the application is positioned directly between existing sites to the northeast, northwest and to the south. Throughout the cell there are large areas of 'indoor suburban' and 'indoor urban' coverage. These areas are not the highest grade of coverage available for 3G and subject to fluctuation during busy periods as the coverage is provided at the periphery of neighbouring cells, which shrink in size as more users utilise the network via that base station.

The significant improvement predicted once the application site is integrated into the networks is represented by the magenta shading. High quality 3G coverage can be seen to be provided to Downside Crescent, Lawn Road, Upper Park Road, Antrim Road, Tasker Road, Haverstock Hill and the surrounding area. The areas benefitting from the significantly enhanced coverage include numerous residential properties, recreational spaces, residential roads and distributor roads. It will provide improved, more reliable coverage to the busy Belsize Underground Station.

Due to the relative infancy of the 4G network, existing coverage is of even less quality than the established 3G network and as such the service improvement by the proposed installation even more pronounced. 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 and Vodafone networks 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
RT	Downside Lodge, 29 Upper Park Road, NW3 2UY	527630/185151	The landlord has confirmed this building is not available for use. Without the site provider's permission, an option here cannot be progressed. The operators cannot compel a site provider to allow them to use the land. The option was discounted on this basis.
RT	Allingham Court, Haverstock Hill, NW3 2AH	527342/185135	The owner of this building will not allow CTIL equipment to be installed. Without the site provider's permission, an option here cannot be progressed. The operators cannot compel a site provider to allow them to use the land. In addition, as this site is not within a conservation area, the proposed equipment could be installed here without the need for an application for planning permission or prior approval. Clearly if this option were available to the operators, they would take it. As this site cannot be used, the need for a site remains and this option was discounted.
RT	Holmefield Court, Belsize Grove, NW3 4RU.	527374/184975	The landlord has confirmed this building is not available for use. Without the site provider's permission, an option here cannot be progressed. The operators cannot compel a site provider to allow them to use the land. The option was discounted on this basis.
RT	135 Haverstock Hill, NW3 4RU	527492/184926	As above.

RT	Belsize Park Tube Station, 190 Haverstock Hill, NW3 2AJ	527371, 185102	After initially considering hosting a telecoms installation (a planning application was submitted and subsequently withdrawn), the landlord has confirmed the building is not available for use. Without the site provider's permission, an option here cannot be progressed. The operators cannot compel a site provider to allow them to use the land.

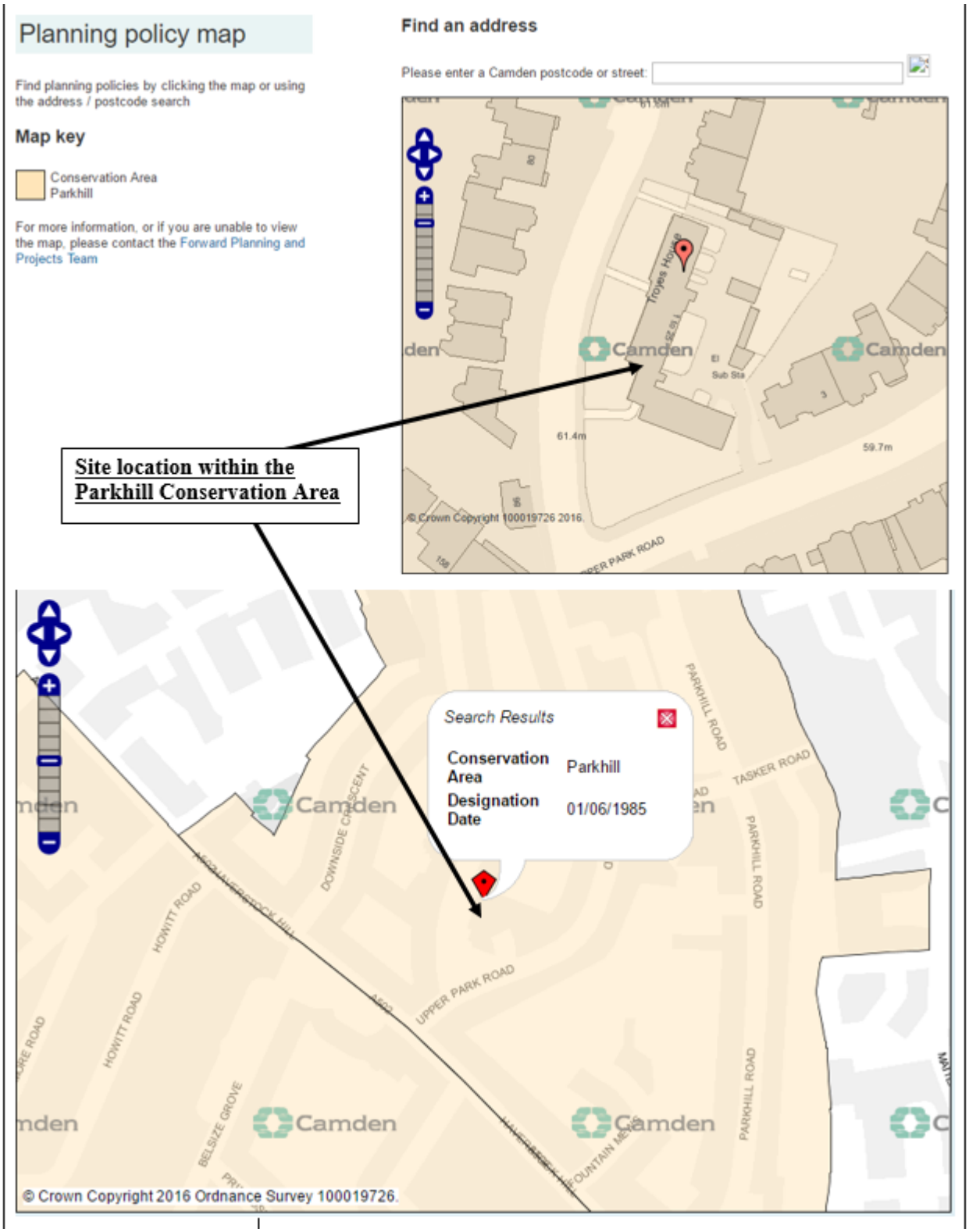
If no alternative site options have been investigated, please explain why:

The cellular region is relatively small in size and wholly encompasses residential areas forming part of Belsize Park.

Due to the nature of the cell and its conservation area character, there are limited potential options which could overcome the surrounding topography, clutter (buildings, trees and other structures), whilst causing minimal visual impact to be considered acceptable development within the conservation area setting. The buildings discounted above are in addition not as well located as the application site to fill the coverage gap; they would tend to more duplicate coverage than provide new coverage. However, when the operators need a site, they will consider all options.

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 Troyes House 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 site is located within the Parkhill Conservation Area (see plan above taken from Camden Local Plan maps (top) and Conservation Area Map search (bottom).

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. …; (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;*

- *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 screened antennas would be in keeping with the building and surrounding area and entirely 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.

The NPPF sets out thirteen sections to 'Achieve Sustainable Development'. The relevant parts are addressed below.

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 section 5 of Delivering Sustainable

Development in the 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. The antennas within 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 and Vodafone'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 it 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. As already mentioned, 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 application site is situated within Parkhill Conservation Area. The main relevant points from the Parkhill and Upper Park Conservation Area Appraisal and Management Statement are that Troyes House is a neutral contributor ie neither enhances nor detracts from the character and appearance; it was built post 1945 to replace war damage; that the curved residential view of Lawn Road is one of the key, picturesque views in the conservation area; that the buildings and streetscape of Lawn Road are not homogeneous on both sides of the street; that roofscape is an important characteristic of the area in general and it is important to preserve the appearance of profile of roofs where these form part of a homogeneous stylistic group, such as the intact roofscape of the 1860s houses at Nos 5-12 Lawn Road; and box shaped additions are frowned upon as unsympathetic.

That Troyes House is a neutral contributor is in direct conflict with the delegated report of the previous application, which claimed that the existing plant room is visually intrusive and thus the proposed extension in that application would be as well. If the existing plant room was offensive, it is clear that this would have been specifically pointed out in the conservation area assessment. The proposed GRP enclosures will ensure the neutrality of the building continues.

Whilst Lawn Road is indeed a key view, it is one of the few examples in the area where homogeneity does not reign on both sides of the road in terms of buildings and streetscape, and thus where a small change in roof form has the potential to not be out of place and to result in less than substantial impact upon the conservation area.

The design proposed acknowledges the location within a conservation area. It is important to note however that the appraisal specifically says that it is important to preserve the appearance and profile of roofs where these form part of a homogeneous stylistic group, with the intact roofscape of the 1860s houses at Nos 5-12 Lawn Road (at the opposite end of the road to Troyes House) supplied as one of the examples. It is therefore clear from the appraisal that Troyes House does not represent part of a homogeneous stylistic group where the roofscape should be preserved; the preservation of Troyes House roof is therefore not as important. The design chosen does of course still preserve the character and appearance of the area, and Troyes House, with its substantial footprint and its existing rooftop plant room which the proposed GRP enclosures reflect, can absorb the proposed change successfully without interfering in any negative way with the appearance of the rooftop in general nor with the key view of the curving residential appearance of Lawn Road.

That leaves, in terms of the points raised in the conservation area appraisal, the resistance to box-shaped additions. Presumably these are particularly offensive in homogeneous areas/groups of buildings, of which Troyes House is not one. It is clear from the montages that the 'box-shaped' GRP enclosure will appear in views simply as another rooftop structure, blending in seamlessly with other rooftop infrastructure such as chimneys in some views, and in views where there is little rooftop infrastructure, it appears exactly the way it is supposed to: a standard, functional and not at all unusual rooftop structure. It does not appear out of place nor draw the eye.

Thus the proposal does indeed preserve the character and appearance of the conservation area.

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 telephone kiosk outside the Haverstock Hotel at the junction of Upper Park Road and Haverstock Hill nor from the Grade II listed 148 Haverstock Hill to the rear of the hotel, or on their setting or views to and from the assets given intervening distances and natural vegetation.

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 and Vodafone 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 applicants' 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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