

## SUPPLEMENTARY INFORMATION

### 1. Site Details

Site Name:	Parkside Court	Site Address:	Parkside Court, Gloucester Avenue, London NW1 7AT
National Grid Reference:	528580, 183654		
Site Ref Number:	CTIL-150184	Site Type: <sup>1</sup>	Macro

### 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:		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		

#### Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	17 <sup>th</sup> May 2017
Name of contact:	N/A
Summary of outcome/Main issues raised:	
A pre-application consultation letter was submitted to the planning authority on 17 <sup>th</sup> May 2017. In response, they advised that a fee of £974 was required to provide a formal advise.	
It was decided to proceed without formal advise straight to a planning application.	

#### Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:			
Consultation was undertaken on 17 <sup>th</sup> May 2017 with the Camden Town with Primrose Hill Ward Councillors, Councillors Callaghan, Cotton, Pietragnoli, and with the Member of Parliament for the area.			
A voluntary site notice was displayed outside Parkside Court 17 <sup>th</sup> May 2017.			

<sup>1</sup> Macro or Micro

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

Seven emails of objection were received. The main objections raised were:

1. Health concerns
2. Close to schools
3. Property devaluation

### School/College

Location of site in relation to school/college (include name of school/college):

North Bridge House Prep School, 1 Gloucester Avenue, London, NW1 7AB is located approximately 29m from the site.

The Cavendish School, 31 Inverness Street, London, NW1 7HB is located approximately 184m from the site.

Regents Park Nursery, 14-15 Gloucester Gate, London, NW1 4HG is located approximately 189m from the site.

St. Marks Sq. Nursery School, St Marks Church, Regents Park, London, NW1 7TN is located approximately 303m from the site.

Outline of consultation carried out with school/college (include evidence of consultation):

Consultation letters were sent to the above schools and nurseries on 17<sup>th</sup> May 2017.

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

To date, no response has been received.

### Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	20 <sup>th</sup> June 2017	

\*Proposed Development

The proposed site:

The application site is to be located at Parkside Court, a five-storey brick building located on Gloucester Avenue close to the junction Oval Road.

There is an existing water tank room on the middle 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 Primrose Hill Conservation Area.

Enclose map showing the cell centre and adjoining cells if appropriate:

Please see enclosed coverage plots

Type of Structure (e.g. tower, mast, etc):

Description:

The installation of 6no. antennas and 6no. cabinets located behind GRP screens painted with a brick effect, 1no. ground based meter cabinet and ancillary works thereto.

Overall Height:

Height of existing building (where applicable):	15.76 Metres
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Equipment Housing:

Length:	0.60 Metres
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Width:	0.75 Metres
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Height:	1.98 Metres
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Materials (as applicable):

Tower/mast etc – type of material and external colour:	GRP screens with a brickwork finish to match the variegated colour and appearance of the existing brickwork façade of the building.
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Equipment housing – type of material and external colour:	Steel coloured grey.
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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 cabinets which contain the equipment used to generate the radio signals, 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, 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 and cabinets will be located behind GRP screens in order to minimise visual impact. The antennas will be installed behind two GRP screens on the north west and south eastern corners of the roof. The cabinets will be located in the middle of the roof. 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.

## Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)	Yes	No
<p>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.</p> <p>When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, Telefonica operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of Telefonica's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>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.</p> <p>The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with</p>		

other electrical equipment, air traffic services or instrumentation operated in the national interest.		
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### 3. 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

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, web, TV and downloads. Without base stations, mobiles will not work. They are made up of three main elements. The cabinets which contain the equipment used to generate the radio signal. The supporting structure such as a mast, which holds the antennas in the air and the antennas themselves. Only the antennas emit radio signals.

Many other everyday items also use radio signals to send and receive information, such as television and radio broadcasting equipment and two-way radio communications. Base stations are connected to each other and telephone exchanges by cables or wireless technology such as microwave dishes, to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills, which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service. Each base station covers a certain area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular more base stations are needed to ensure continuous coverage.

The site would provide 2G, 3G and 4G coverage for both 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.

### 4. 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
1	Holyrood Court, 3-5 Gloucester Avenue, London NW1 7AE	528604,183633	The rooftop of this building is not suitable to install telecommunications equipment on.
2	St. Mark's Church, St Mark's Square, London NW1 7TN	528246,183721	This site is host to an existing O2 and Vodafone installation. The design of the church steeple means that only a certain type of antenna can be used providing 3G coverage only to the area.
3	Regent's Park, London NW1 4SX	528482,183553	The Royal Parks have confirmed that they do not host telecommunications equipment within their parks
4	Street Furniture Installation, Prince Albert Road, London NW1 7SN	528494,183627	A street furniture installation along Prince Albert Road is unlikely to be supported by the Local Planning Authority. Furthermore, the pavement is narrow and would not provide enough space for the equipment and for passers-by to move

			past the equipment safely.
5	Foxtons, 120 Parkway, Camden, London NW1 7AN	528658,183640	This building is too low to provide the required coverage to the area.
6	Latitude House, Oval Road, London NW1 7EU	528662,183676	This building is shadowed by taller buildings in the area so will not provide the required coverage to the area.
7	Darwin Court, Gloucester Avenue, London NW1 7BG	528546,183723	This building is surrounded by large mature trees. The radio signals cannot penetrate through tree cover therefore an installation at this location would not be able to provide the required coverage to the area.

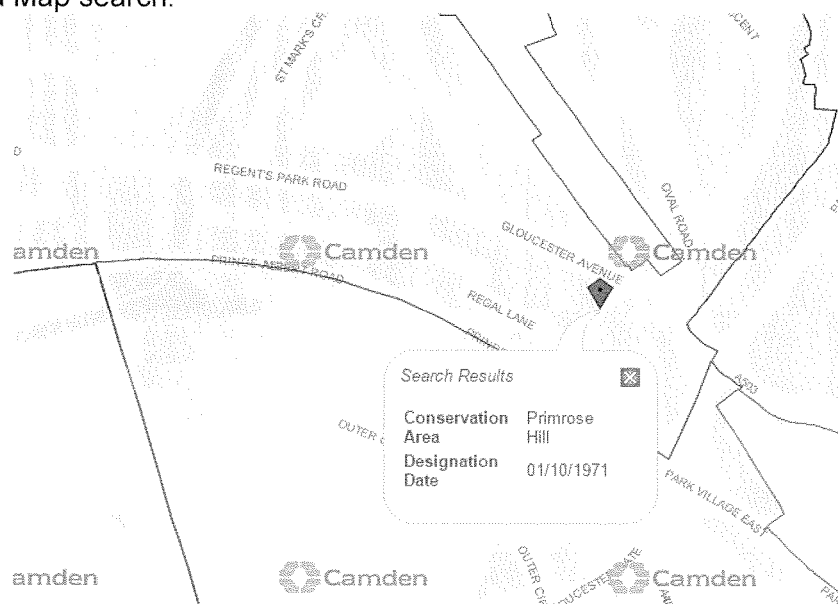
If no alternative site options have been investigated, please explain why:

Environmental Information (refer to Section 2 of Site Finder Report):

The site is well separated from environmentally sensitive locations and would not impact on ecologically sensitive land use, being located well away from any nature reserve, SSSI National park or other area where development might be considered disruptive. Environment agency records confirm that the site falls within an area with a low possibility of flooding and it is confirmed that the small scale of development proposed would not, in any case, increase the risk of flooding.

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

The site is located within the Primrose Hill Conservation Area - see plan taken from Camden Conservation Area Map search.



Primrose Hill Conservation Area is divided into four sub-areas of which Parkside Court is located within Area 1 - Regent's Park Road South. The principal roads include Prince Albert Road, which was part of Nash's original plan for Regent's Park, Albert Terrace, Gloucester Avenue and the south section of Regent's Park Road. These latter three roads form part of the planned suburban 19th century Southampton Estate and are of a consistently generous width with wide pavements and gently curving forms.

Italianate villas dominate the principal and secondary roads within this sub area. These large properties are between three and four storeys high, with basements. They are designed to appear as grand residential properties and have raised ground floors, numerous decorative features and are set back from the main road with front gardens bounded by medium height brick walls with gate piers.

The proposal effectively conceals the telecommunications apparatus using an innovative GRP screen that resembles existing elements observed within the Conservation Area. Although the proposal will be visible from ground level visibility does not equate to harm. The equipment will be viewed as part of the varying age, scale, materials and architectural form that defines the character of the area.

The proposal would not result in any substantial harm or loss to these heritage assets or their settings, as defined by the National Planning Policy Framework. Paragraph 143 of the Framework notes that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset any harm should be weighed against the benefits of the proposal, which, in this case, is the significant public benefit arising from improving the communications infrastructure in this area.

Additional relevant information (include planning policy and material considerations):

### **Visual Impact and Appearance**

In line with national planning policy guidance and the relevant policies of the Local Plan, the impact of the development is minimised through siting and design initiatives.

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for Telefónica and Vodafone. It is considered that the proposal is the least visually intrusive site and design available.

It is considered that the proposal utilises the most suitable design available to meet coverage demands. It is considered any other solution to providing the required coverage would have a greater visual impact. The site is within a Primrose Hill Conservation Area, however, the specific design of the installation, and the location of the building, ensures the impact of the development would be minimal. The host building is set on Gloucester Avenue, an area characterised by villa properties. The use of GRP screens would conceal the equipment so it is not directly visible reducing the impact on the area.

The benefits of the proposal also have to be considered. 2G, 3G and 4G coverage would be provided for both Telefónica and Vodafone from the site. It is considered the benefits of the proposal outweigh the minimal additional impact on the surrounding area.

On balance this proposed location is considered to be the optimum location for providing coverage in terms of siting and design. As such, equilibrium will be achieved between technical requirements and environmental impact.

### **Planning Policy**

#### **National Planning Policy Guidance**

The National Planning Policy Framework, 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 and cabinets behind the GRP screens and 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 screens upon the character and appearance of the conservation area has to be weighed against the fact that they would reflect the height of existing tank room on the rooftop 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 behind brick effect GRP screens 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.

### **London Plan (2016)**

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

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

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

It is considered that the Telefónica 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 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.

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.

Name: (Agent)	Eleanor Jacques	Telephone:	01932 411011
Operator:	Telefónica UK Limited		
Address:	c/o Waldon Telecom, Phoenix House, Pyrford Road, West Byfleet, Surrey KT14 6RA	Email Address:	Eleanor.jacques@waldontelecom.com
Signed:		Date:	20 <sup>th</sup> June 2017
Position:	Acquisition Surveyor	Company:	
		(on behalf of CTIL and above operator)	Waldon Telecom