SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Greater London House	Site Address:	Greater London House, Hampstead Road, Hampstead, London NW1 7QX
National Grid Reference:	529155, 183274		
Site Ref Number:	CTIL_137428	Site Type:[1]	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: This is proposal is for an upgrade of an existing site.		
Were industry site databases checked for suitable sites by the operator:	~~Yes~~	**No**
If no explain why: This is proposal is for an upgrade of an existing site.		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	21st May 2018
Name of contact:	N/A
Summary of outcome/Main issues raised: Preapplication consultation was submitted to the local planning authority on 21st May 2018. In response the planning team advised that the fee for this service was £989.02. Due to the minor nature of the upgrade proposal it was decided that the applicant would proceed to planning application submission without preapplication consultation.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	**Amber**	Green
Outline of consultation carried out: Preapplication consultation letters were sent on 21st May 2018 to the Regent's Park Ward Councillors Ali, Johnson and Shah and MP Keir Starmer.			
Summary of outcome/main issues raised (include copies of relevant correspondence): To date no response has been received.			

[1] Macro or Micro

School/College

Location of site in relation to school/college (include name of school/college): There are no schools located within 300m of the site
Outline of consultation carried out with school/college (include evidence of consultation): N/A
Summary of outcome/main issues raised (include copies of main correspondence): N/A

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:	25th June 2018	

3. Proposed Development

The proposed site:
The application site is an existing electronic communications site on the rooftop of Greater London House, a large multi storey commercial building. The building is located within the Camden Town Conservation Area.

Type of Structure *(e.g. tower, mast, etc):*	
Description: The removal of 7no. existing antennas to be replaced with 9no. new ones utilising existing support poles, the installation of 1no. 600mm dish, the removal of 7no. existing cabinets to be replaced with 5no. new ones and ancillary works thereto.	
Overall Height:	
Height of existing building:	31.70 Metres
Equipment Housing:	
Length:	0.60 Metres
Width:	0.75 Metres
Height:	1.98 Metres
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Steel pole mounts

Equipment housing – type of material and external colour:	Steel cabinets
Reasons for choice of design, making reference to pre-application responses:	

Every effort has been made to minimise the visual impact of the proposed development. The equipment has been designed specifically for this location and incorporates a number of elements to minimise impact, including:

1) Utilising an existing telecommunications site to provide 4G coverage for Telefónica

2) Keeping the scale of development to a minimum. Replacing the existing 7no. antenna with 9no. new ones, and replacement cabinets, are required to provide significantly enhanced coverage to the surrounding area;

3) The design of the development involves a minimal increase in its scale to ensure there would be no adverse impact on the surrounding area. It is acknowledged the scale of the development would be increased, however this is considered minimal and not sufficient to cause harm to the surrounding area, including the Conservation Area.

It is considered the proposed equipment is appropriately located. It has been possible to devise a scheme which has a minimal visual impact, by utilising a single site to provide significantly enhanced coverage to the surrounding area.

The design would result in a less intrusive facility than other designs, therefore preserving the character and appearance of the area. It is further considered the proposal strikes an appropriate balance between operational and environmental considerations.

Technical Information

	Yes	~~No~~
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, Telefonica operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of Telefonica's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in		

accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		

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 upgrade is to provide improved 4G coverage to the surrounding area. The works are of a minor scale and will leave the appearance of the existing installation largely unaffected. The proposed new equipment will operate at faster speeds, enabling improved 4G services to be provided for Telefónica.

As stated in Paragraph 42 of the NPPF '*Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.*' The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal will assist in achieving these objectives.

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 is required to provide improved 4G network service for Telefónica.

As stated in Paragraph 42 of the NPPF '*Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.*' The NPPF takes account of the growth of the industry and technology, of the new social and

economic demands for communications, and of the Government's environmental policies. This proposal, to enable the operators to provide enhanced 4G coverage, will assist in achieving these objectives.

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

OfCom's Communications Market Report for the UK (August 2015) made the following key points in relation to mobile phones and 4G usage:

- '***Smartphones have overtaken laptops as the most popular device for getting online, Ofcom research has revealed, with record ownership and use transforming the way we communicate.***
- *Two thirds of people now own a smartphone, using it for nearly two hours every day to browse the internet, access social media, bank and shop online.*
- *A third (33%) of internet users see their smartphone as the most important device for going online, compared to 30% who are still sticking with their laptop.*
- *The rise in smartphone surfing marks a clear shift since 2014, when just 22% turned to their phone first, and 40% preferred their laptop.*
- *Smartphones have become the hub of our daily lives and are now in the pockets of two thirds (66%) of UK adults, up from 39% in 2012.*
- *The vast majority (90%) of 16-24 year olds own one; but 55-64 year olds are also joining the smartphone revolution, with ownership in this age group more than doubling since 2012, from 19% to 50%.*
- *The surge is being driven by the increasing take-up of 4G mobile broadband, providing faster online access. During 2014, 4G subscriptions have leapt from 2.7 million to 23.6 million by the end of 2014.*
- *We now spend almost twice as long online with our smartphones than on laptops and personal computers.*
- *On average, adult mobile users spent nearly two hours online each day using a smartphone in March 2015 (1 hour and 54 minutes), compared to just over an hour on laptops and PCs (1 hour and nine minutes).'*

There is no doubt that this is a very busy area of London. To meet this demand and improve the quality of service, additional base stations may be needed. In this case the upgrade of an existing base station will meet the technical requirements.

The benefits to commerce, industry and the public in general are well recognised. It has already been discussed that the Government places great emphasis on the benefits of mobile telecommunications to modern life. With this in mind, the proposal will ensure a high standard of coverage to customers in the surrounding area.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.

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)

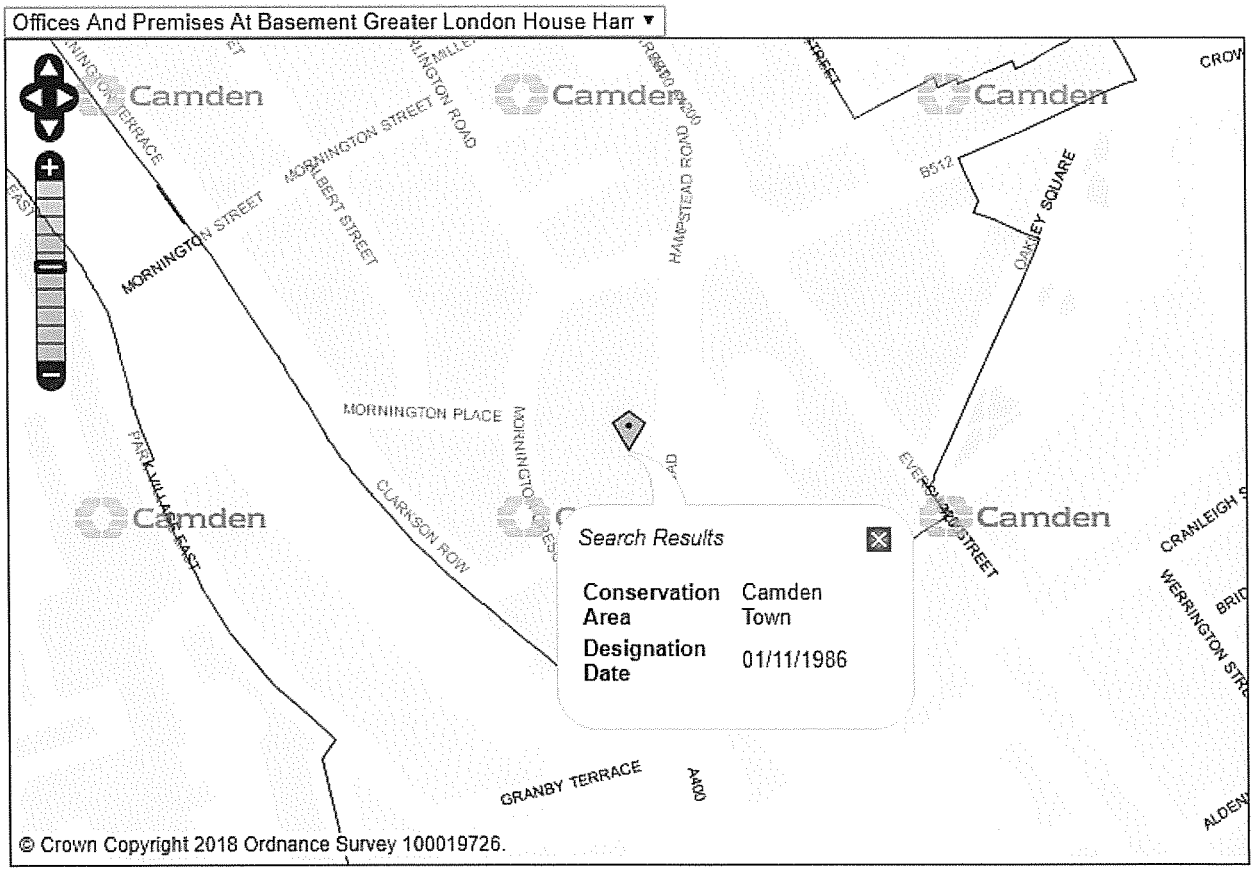
Site Type	Site name and address	National Grid Reference	Reason for not choosing site

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

Paragraph 43 of the National Planning Policy Framework (NPPF) sets out that local authorities '*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*". As the proposal is to upgrade an existing mast, an alternative option investigation was not required.

Land use planning designations:

The below map is an extract of the LPA's LDF policies map 2016. The green flag indicates the application site. The extract confirms the site is within Camden Town Conservation Area. No other designations affect the site.



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 (include 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 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 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 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 would have some, albeit minimal, impact.

This impact has to be balanced against the technological need for improved mobile connectivity. The proposal would allow Telefonica to use the apparatus to provide improved 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 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 antennas 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. 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.

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 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 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 forms 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 improving 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 design 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 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 positioned so 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.

In summary, the proposal is sympathetically designed and is 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.

Confirmation that submitted drawings have been checked for accuracy

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Signed:	*E.Jacques*	Date:	5th July 2018
Position:	Acquisiton Surveyor	Company:	Waldon Telecom
		(on behalf of CTIL and above operator)	