

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Darwin Court	Site Address:	Darwin Court, 66- 89 Darwin Court, Gloucester Avenue, Camden, London, NW1 7BQ
National Grid Reference:	528514, 183748		
Site Ref Number:	CTIL_149925 20	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

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:	Yes
Date of pre-application contact:	Tuesday 4 th June 2019
Name of contact:	Ben Farrant
<p>Summary of outcome/Main issues raised: A pre-application letter and drawings was submitted to the planning authority on Tuesday 21st May 2019.</p> <p>In response, Mr Ben Farrant advised he had concerns with the amount of clutter to the roof of the building, particularly given its public visibility and setting within the conservation area and deemed this to have a detrimental impact on the property and conservation area. Mr Farrant acknowledged the public benefit of the proposed installation, however, he went onto suggest that this would be insufficient to outweigh the harm caused to the heritage asset.</p> <p>Mr Farrant outlined there have been previous refusals for additions to the roofs of these buildings (mostly roof extensions rather than telecoms equipment), which have later been dismissed at appeal and suggests there would be similar concerns with the design and impact of our proposal on the heritage assets in question.</p>	

¹ Macro or Micro

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
<p>Outline of consultation carried out:</p> <p>As with all Cornerstone, Telefonica and Vodafone proposals, the site and proposed works were assessed against the traffic light model contained within the Code of Best Practice on Mobile Network Development (2013).</p> <p>An amber rating was assigned in this instance and consultation was undertaken on Tuesday 21st May 2019 with the Camden Town with Primrose Hill Ward Councillors, Councillors Callaghan, Cotton and Pietragnoli and with the Member of Parliament for the area.</p> <p>Consultation letters were also sent to residents at Darwin Court, on Gloucester Avenue, Regents Park Road, Prince Albert Road and Oval Road.</p>			
<p>Summary of outcome/main issues raised (include copies of relevant correspondence):</p> <p>Five responses were received by email. The main objections raised were:</p> <ol style="list-style-type: none">1. Visually intrusive2. Health concerns3. Detrimental to the Conservation Area4. The proposal would be in close proximity to a school <p>All UK mobile base stations are designed to comply with guidelines set by the International Commission on Non-Ionisation Radiation ('ICNIRP'), an independent commission set up to provide scientific advice and guidance on the health and environmental effects of non-ionising radiation which is used in mobile telecommunications. The guidelines set by the commission are in place to protect all members of the public, of all ages and in all states of health and wherever they might be in relation to a base station for 24 hours a day. They are backed by the World Health Organisation, the EU and the UK Government.</p> <p>Further to this, the consensus of the international scientific community is that there has been no convincing evidence to date that RF field exposure below the internationally agreed guideline levels applied in the UK causes negative health effects in adults or children.</p> <p>Every effort has been made to keep the proposal as small as possible, but this is bound by technical restraints.</p>			

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 188m from the site. Super Camps At North Bridge House Prep School, 1 Gloucester Avenue, London, NW1 7AB is located approximately 193m from the site.
Outline of consultation carried out with school/college (include evidence of consultation): Consultation was undertaken via email on Tuesday 21 st May 2019 to the above two schools.
Summary of outcome/main issues raised (include copies of main correspondence): To date, 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- Full Planning Application.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	N/A- full Planning Application	

3. Proposed Development

The proposed site:
<p>The application site is to be located at Darwin Court, a six-storey brick building located on Gloucester Avenue close to the junction of Regent's Park Road. The building is located within the Primrose Hill Conservation Area.</p> <p>The area is predominately residential in character. Development consists of a mix of flats and houses. The level and scale of development in this area of London combined with the road layouts means that views of the building are not available over long distances.</p> <p>The proposed development would provide improved 2G, 3G, 4G coverage and new 5G coverage to the surrounding area for Telefónica (trading as O2) and Vodafone.</p>

Enclose map showing the cell centre and adjoining cells if appropriate:
Please see the enclosed coverage plots.

Type of Structure (e.g. tower, mast, etc):	
Description:	
<p>The proposed works consist of the installation of 12No. new antennas, 4No. 300mm dishes, 5No. cabinets and ancillary works thereto, all at roof level.</p> <p>1 x cabinet with dimensions: 820mm(w) x 700mm(d) x 1800mm(h) 2 x cabinets with dimensions: 750mm(w) x 600mm(d) x 2100mm(h) 2 x cabinets with dimensions: 800mm(w) x 660mm(d) x 1770mm(h)</p>	
Overall Height:	
Height of existing building (where applicable):	18 Metres
Equipment Housing:	
Length:	As above
Width:	As above
Height:	As above
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	New support poles - steel
Equipment housing – type of material and external colour:	Steel- Grey (unless otherwise requested by the Local Authority)

Reasons for choice of design, making reference to pre-application responses:
<p>In designing the proposed scheme, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily</p>

influenced the design and limited the scope to alter the appearance of the site to a significant degree.

There are three main elements to a radio base station; the cabin or 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 links into the network either by fibre cabling or by dish antennas, 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.

The type of technology being deployed determines the type of equipment and antennas required, which in turn impacts upon the type of support structure and or design methods than can be employed on an aesthetic level. 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.

The purpose of this proposal is to enable new and improved 2G, 3G, 4G and 5G services for the Telefonica and Vodafone networks. In order to achieve this, the installation of a new base station is required at the application site, Darwin Court.

To achieve the required coverage and network improvement 12no. antennas are required. 4No. antennas will be installed on the north section of the roof, 4No. antennas will be installed on the south east section of the roof and 4No. antennas will be installed in the west section of the roof. The antenna height is determined by a specialist network radio engineer using specialist software which factors in the area that coverage is required, the relationship between the selected site location and existing cell sites in the linked network and variances in land levels and elements such as nearby trees or buildings, which can block or weaken signals.

The dishes are located on the rooftop where they can have a clear connection to the core network – ensuring that seamless connection between the cells can be made above the surrounding skyline clutter and any other obstructions. The size and height of the dishes is determined by the location of these surrounding neighbour cells. In this instance, 4no. 300mm dishes are required. The size and number of dishes has been kept to the minimum required for operational efficiency and the associated impact of this addition on the surroundings would be minimal.

RRUs and ERSs are small radio units that are used for the transmission of radio signal. These will be sited as close to the antennas as possible for operational efficiency.

Radio signals are generated within radio equipment housing cabinets and 5no. equipment cabinets are required at this site. These cabinets will be positioned in a neat arrangement at the back of the rooftop with the backdrop of the plantroom wall. Given the height of the rooftop, it is therefore very unlikely that these cabinets will be viewed

from ground level and will cause little or no significant harm to the visual amenity of the rooftop.

As detailed, all apparatus required would play a vital role in the provision of new and improved 2G, 3G, 4G and 5G services. The scale and amount of apparatus has been limited to the minimum with which this can be achieved, with the result that the level of visual change at the site would be negligible and any harm to the host building, its setting or the wider area avoided. It is also considered that the public benefit of this proposal greatly outweighs any impact on the building, or the wider setting, and the development has been designed to ensure that this is the case.

Technical Information

	Yes	No
<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)</p> <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 and Vodafone 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 and Vodafone'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</p>		

<p>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 other electrical equipment, air traffic services or instrumentation operated in the national interest.</p>		
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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

As stated, the proposed development will enable the provision of improved 2G, 3G, 4G and new 5G services for two major mobile networks (Telefonica (O2) and Vodafone. 4G (LTE, the acronym used for 'Long Term Evolution') supports mixed data, voice, video and messaging traffic and offers speeds of up to five times faster than 3G, enabling network users with 4G devices to benefit from ultra-fast internet browsing, video streaming, gaming, e-mail and downloads. 5G is the next generation of mobile internet connectivity, offering faster speeds and more reliable connections on smartphones and other devices than ever before. Compared to even the most recent and efficient generation of mobile network, 4G, 5G is set to be far faster and more reliable, with greater capacity and lower response times.

High-quality communications infrastructure is essential for sustainable economic growth and that high-speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.

The UK Government, recognising the benefits to commerce, industry and the public in general, places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. Paragraph 122 of the NPPF (2018) states that "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) ..." 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 Telefónica and Vodafone to provide improved network services to the surrounding area, will assist in achieving these objectives within Camden.

In addition, the very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network. This proposal is imperative to maintaining the necessary network services and contributing to the maintenance of mobile communications within the area.

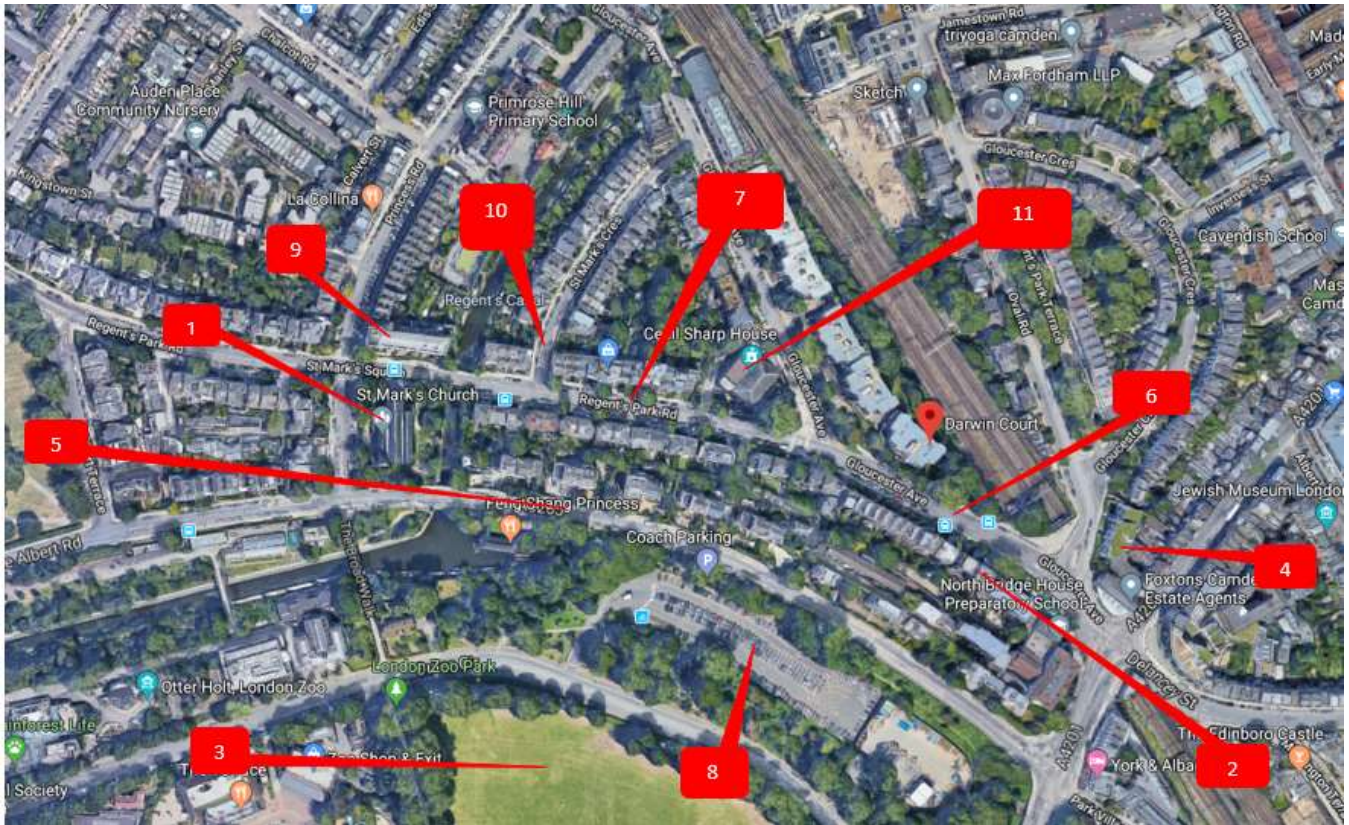
Site Selection Process

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
Rooftop (1)	St. Mark's Church, St Mark's Square, London NW1 7TN	528604,183633	This site is already host to an existing Telefonica and Vodafone telecommunications site.
Rooftop (2)	Parkside Court, Gloucester Avenue, London NW1 7AT	528580,183654	A Telefonica and Vodafone telecommunications proposal was refused planning permission at Parkside Court rooftop - Ref: 2017/3674/P
Greenfield (3)	Regent's Park, London NW1 4SX	528482,183553	A 17.5m – 20m mast would be require at this location so that the antennas are able to clear the large mature trees located in the vicinity and allow the signal to propagate from the site throughout the whole of the target coverage area. It is considered that a structure of this height at this location would not be support by the Local Planning Authority.
Rooftop (4)	Latitude House, Oval Road, London NW1 7EU	528662,183676	This building is too low to provide the required coverage to the target area.
Street Furniture (5)	Street Furniture Installation, Prince Albert Road, London NW1 7SN	(Various NGRs)	A 15m -17.5m street furniture pole would be required at these locations to achieve optimum coverage in this area. These

			roads are of a residential nature and would not provide sufficient pavement space for a street furniture installation as well as the safe passage of pedestrians using pushchairs and wheelchairs. Furthermore, it is considered that an installation of this nature, directly overlooked on both sides by residential dwellings, would not be supported by the Local Planning Authority.
Street Furniture (6)	Street Furniture Installation, Gloucester Avenue, London, NW1 7BH	(Various NGRs)	A 15m -17.5m street furniture pole would be required at these locations to achieve optimum coverage in this area. These roads are of a residential nature and would not provide sufficient pavement space for a street furniture installation as well as the safe passage of pedestrians using pushchairs and wheelchairs. Furthermore, it is considered that an installation of this nature, directly overlooked on both sides by residential dwellings, would not be supported by the Local Planning Authority.
Street Furniture (7)	Street Furniture, Regent's Park Road, London, NW1 7TL	(Various NGRs)	A 15m -17.5m street furniture pole would be required at these locations to achieve optimum coverage in this area. These roads are of a residential nature and would not provide sufficient pavement space for a street furniture installation as well as the safe passage of pedestrians using pushchairs and wheelchairs. Furthermore, it is considered that an installation of this nature, directly overlooked on both sides by residential dwellings, would not be supported by the Local Planning Authority.
Greenfield (8)	Coach Parking, Outer Cir, London NW1 4SX	528429, 183633	A 17.5m – 20m mast would be require at this location so that the antennas are able to clear the large mature trees located in the vicinity and allow the signal to

			propagate from the site throughout the whole of the target coverage area. It is considered that a structure of this height at this location would not be supported by the Local Planning Authority.
Rooftop (9)	5-8 St Mark's Square, Camden Town, London, NW1 7TN	528244, 183725	This option is located too close to an existing operational Telefonica and Vodafone site that provides coverage at this location.
Street Furniture (10)	Street Furniture Installation, St Mark's Crescent, London, NW1 7TS	(Various NGRs)	A 15m -17.5m street furniture pole would be required at these locations to achieve optimum coverage in this area. These roads are of a residential nature and would not provide sufficient pavement space for a street furniture installation as well as the safe passage of pedestrians using pushchairs and wheelchairs. Furthermore, it is considered that an installation of this nature, directly overlooked on both sides by residential dwellings, would not be supported by the Local Planning Authority.
Rooftop (11)	Cecil Sharp House, 2 Regent's Park Road, Primrose Hill, London, NW1 7AY	528446, 183756	This building is too low to provide the required coverage to the target area.



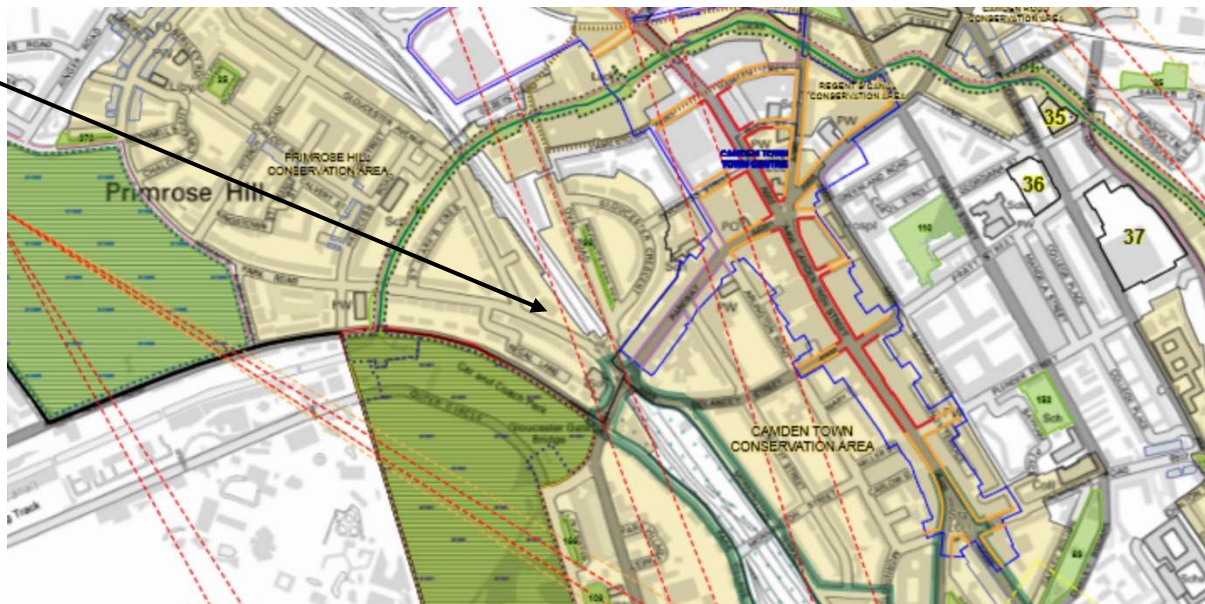
If no alternative site options have been investigated, please explain why:

N/A

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

There is no evidence of protected species at this location. 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.

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



above map is an extract of the Local Planning Authority's policies maps. It confirms the site is located within the Primrose Hill Conservation area. There are no other planning designations affecting the site.

Where new installations are required, as is the case with this proposed development, the scale of works has been minimised, where practicable, and due consideration has been given to the local area in terms of minimising any visual impact to the character or amenity to Primrose Hill Conservation Area, whilst also achieving the technical requirements of the site.

Paragraph 196 of the NPPF makes clear 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". The benefits of connectivity have already been noted in preceding sections. This proposal is in the public interest, as has been recognised by the Government and the higher planning authority. When the balancing exercise is applied the findings weigh very much in favour of this small-scale development proposal.

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

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2019) (NPPF)

The new National Planning Policy Framework, which came into force in July 2018, replaces the guidance published in March 2012. The guidance has subsequently been updated in February 2019. The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "*The purpose of the planning system is to contribute to the achievement of sustainable development*", and in paragraph 10 that "*at the heart of the Framework is a presumption in favour of sustainable development*". In order to

achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

*"a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

For **decision-taking** (paragraph 11) this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. 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."

Further to this, paragraph 38 states that *"Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area."*

The proposed development will enable the provision of reliable and improved mobile communications services to the surrounding area, bringing about substantial public benefit both socially as well as the allowing for certain businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the 'virtual office', thus reducing the need to travel and contributing to the sustainability agenda.

Government advice in recent years has been to promote and encourage communications services. Within his presentation to Parliament in July 2015 of the Government report "Fixing the Foundations: Creating a more prosperous nation" the Chancellor of the Exchequer reiterated the importance of a high-speed digital

communication infrastructure. *“7.1 Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.*

By reducing regulatory red tape and barriers to investment, the government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published in March, of near-universal 4G and ultrafast broadband coverage.”

The NPPF (2019) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

*“b) infrastructure for transport, **telecommunications** (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)”*

Leading on from this, paragraph 112 states that *“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections”.*

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 113 states that *“The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged”.*

This singular proposal will provide coverage for two operators which is in line with the above policy.

It should be noted that paragraph 116 states that *“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure”.*

The proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

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 becomes clear telecommunications 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 considered, the new telecommunications development in this application, is consistent with this strategic policy, contributing in a sustainable fashion to London's connectivity and digital economy future.

Development Plan Policy

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

There are no policies relating directly to telecommunications development within the Camden Local Plan (2017). General policies of relevance include D1 (Design) which requires a high standard of development, and policy D2 (Heritage). This policy aims to preserve and enhance Camden's heritage assets, including conservation areas and listed buildings. Development within conservation areas is required to preserve or enhance the character or appearance of the area.

The 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 satisfactory addition without being overbearing on surrounding buildings, the road network or views from the public domain including the Conservation Area.

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 their growing number of residents, workers and visitors. This includes transport, utilities, education, health, open space, emergency services needs and digital infrastructure requirements.' The Appendix 1, in relation to Digital Connectivity, sets out 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. The proposed development will allow this to be achieved in the area.

Further to this, as there is no specific telecommunications policy within the Camden Local Plan (2017), then greater weight should be given to the National Planning Policy Framework (2019) (NPPF), which, as outlined above, is largely supportive of telecommunications development.

Siting and Appearance

This section should be read in conjunction with the preceding sections of this statement where a description of the application site, technical details and justification for the design and details of the public benefits of the proposal are provided.


As highlighted previously, the proposal seeks to provide local communications and connectivity services through the installation of new telecommunications equipment. This new installation is required to provide enhanced coverage for Telefonica and Vodafone to this part of Camden.

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

The site is located within a Primrose Hill Conservation Area, however, the location of the building ensures the impact of the development would be minimal due to the surrounding trees which provide screening for the equipment.

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.

Confirmation that submitted drawings have been checked for accuracy

Name:	Eleanor Jacques	Telephone:	01932 411011
(Agent)	_____		_____
Operator:	Telefonica UK Limited and Vodafone Limited		_____
Address:	c/o Waldon Telecom, Phoenix House, Pyrford Road, West Byfleet, Surrey KT14 6RA	Email Address:	Eleanor.jacques@waldontelecom.com
	_____		_____
Signed:		Date:	22 nd June 2019
	_____		_____
Position:	Acquisition Surveyor	Company:	
	_____	(on behalf of Cornerstone and above operator)	Waldon Telecom
