SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Farjeon House	Site Address:	Farjeon House, Hill Grove Road, Killburn, London, NW6 4TL
National Grid Reference:	E 497774, E 180083		
Site Ref Number:	77547	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: N/A		
Were industry site databases checked for suitable sites by the operator:	**Yes**	No
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	26/03/2020
Name of contact:	N/A

Summary of outcome/Main issues raised:

A consultation letter, associated plans and proposed consultation plan were sent to London Borough of Camden Council via email on 26/02/2020. A consultation response had not been received at the time of writing. Lines of communication will remain open throughout the application process.

Community Consultation

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

Outline of consultation carried out:

The proposal was rated Amber in accordance with the traffic light consultation model in the Code of Best Practice on Mobile Network Development (published 2016). The pre-application consultation plan adhered to best practice guidance.

Pre-application consultation was undertaken with the residents of Farjeon House (flats 1-54) and with the Council Members for Swiss Cottage Ward. A consultation letter and supporting information was posed or emailed to the consultees on 26/03/2020.

[1] Macro or Micro

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

A consultation response was received from the residents of three flats in Farjeon House where concerns were raised about the amount of apparatus proposed and potential for health risk. The agent replied to provide the consultees with additional information, including about how the apparatus would be designed and operated in accordance the health and safety guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP).

A consultation response had not been received from any of the other consultees at the time of writing. Lines of communication will remain open throughout the application process.

School/College

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

The following educational facilities were identified in the local area by using Ofsted data:

- The UCL Academy Adelaide Road, Camden, NW3 3AQ
- Ready Steady Go - St John's Wood, All Souls Hall, 21 Alexandra Road, LONDON, NW8 0DP
- Swiss Cottage Leisure Centre Adelaide Road, Swiss Cottage, London, NW3 3NF
- The Winchester Project Old Winchester Arms, 21 Winchester Road, London, NW3 3NR
- Swiss Cottage Nursery, Swiss Cottage Community Centre, 19 Wincester Road, London, NW3 3NR

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

A consultation letter and supporting information was sent to the facilities on 26/03/2020.

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

A consultation response had not been received from any of the facilities at the time of writing. Lines of communication will remain open throughout the application process.

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:		10/03/2020

3. Proposed Development

The proposed site:

3.1 The application site is located on the rooftop of a residential apartment building named Farjeon House. The building is constructed in brick and is multi-storey with a flat rooftop, possibly dating from the 1960/70's. The rooftop is an existing mobile base-station site, hosting Vodafone's communications apparatus. The building is not locally or nationally listed for its historic significance and it does not fall in any environmental or heritage designation, such as a conservation area.

3.2 The building is located at the junction of Hilgrove Road and Finchley Road in the Swiss Cottage ward of the brough of Camden. Surrounding land uses are mainly made-up of other residential apartment buildings, alongside a parade of local shops and services situated to the east of the site on Finchley Road. Swiss Cottage underground station and a cinema is situated to the north-east of the site.

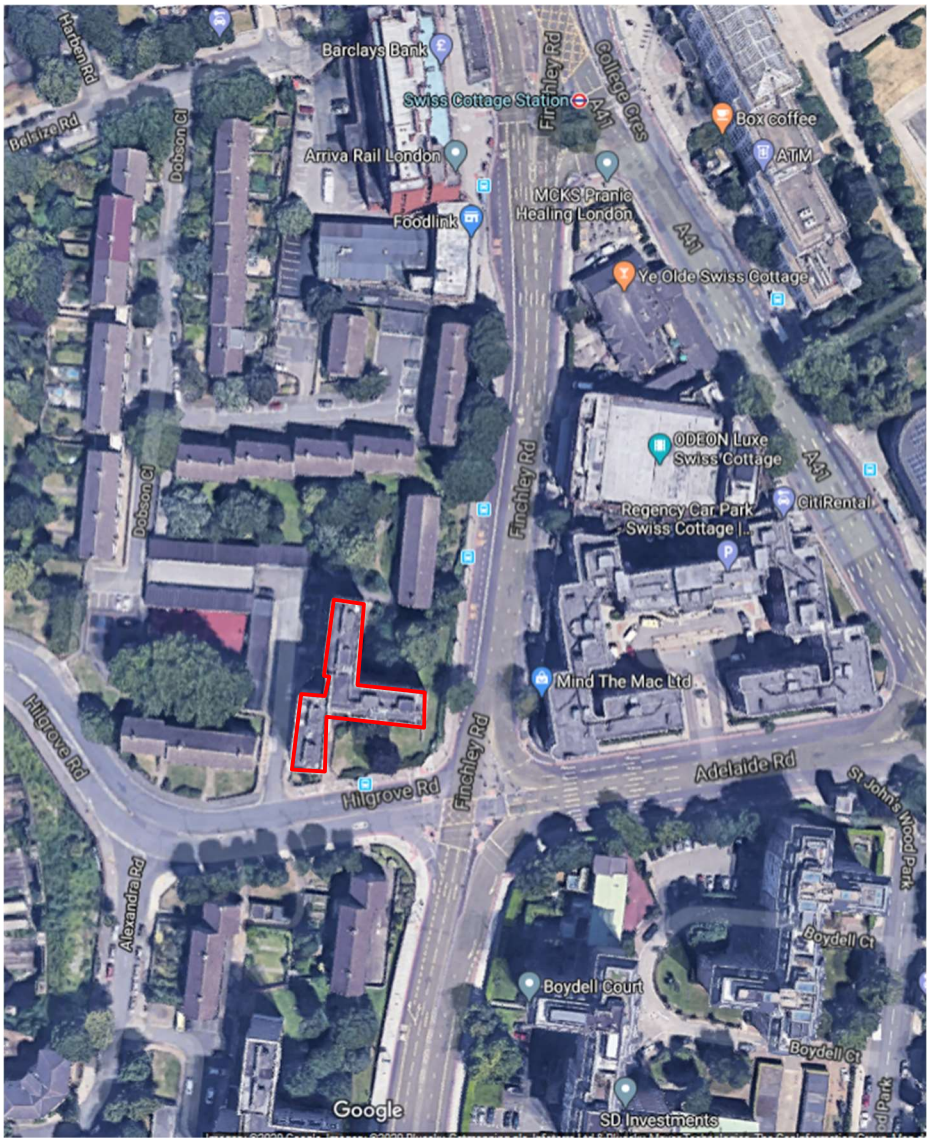


Figure 1. Aerial view of application site. Map source: Google.

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

Network information is provided separately within this application.

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

Description:

Installation of 12No. antenna apertures, 4No. 600mm diameter dishes, 7No. equipment cabinets and supporting steelwork onto rooftop, 1No. cabinet at ground-level, plus ancillary development.

Ancillary development includes steelwork, cable feeders, amplifiers and electrical breakout boxes (BOBS). Please refer to submitted plans for full details.

Equipment housing cabinets

3No. Outdoor cabinets (770x770x2500mm)
1No. AMP5930 cabinet (600x480x1600mm)
1No. Link AC MK 5 cabinet (1200x500x1500mm)
1No. Furo cabinet (770x770x2100mm)
1No. 3900A (770X770X2500mm)
1No. Meter cabinet at ground-level (1100x400x1200mm)

Overall Height:	32.07 Meters
Height of existing building *(where applicable):*	
Equipment Housing:	*see above*
Length:	
Width:	
Height:	
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	White/grey antennas & dishes, galvanised steel supports
Equipment housing – type of material and external colour:	Steel coloured Light Grey (RAL 7035)

Reasons for choice of design, making reference to pre-application responses:

Antennas, dishes & supports

3.3 The equipment layout and design are based on the principle of meeting operational requirements of the mobile operators Everything Everywhere (EE) and Three, whilst minimising impact on the appearance of the host building and its surroundings, as far as technical constraints allow.

3.4 The base-station has been designed to accommodate replacement apparatus, allowing provision of 2G, 3G and 4G mobile connections to the surrounding area to continue. It has also been designed to accommodate new 5G technology, introducing ultra-fast mobile connectivity capable of operating the 'Internet of Things'. This upgraded and replacement infrastructure will provide higher mobile down-load speeds and more reliable, quicker phone connections. There would be increased capacity to provide services to a higher number of people at the same time.

3.5 These improved services can only be provided by using a higher number of antennas that are larger in scale than those at the existing site. This element of the design is informed by the number of communication services being provided (4G, 5G etc.); the fact that the base-station will be multi-operator meaning that both EE and Three require an equal number of antennas; and because of the higher technical capability of the antennas.

3.6 The antennas must be allowed to unrestrictedly emit a radio signal, meaning they need to be sited at a high position at edge of the rooftop to enable the radio signal to clear surrounding structures, such as buildings and trees, with the aim of avoiding interference. The radio frequencies that 5G operates at is particularly sensitive to interference from solid objects, which necessitates securing the antennas to elevated steel support frames at the height proposed. This operational constraint of 5G also means that the antennas cannot be shrouded; the equipment must be exposed for it to operate effectively.

3.7 The layout of the antennas is informed by physical constraints of the rooftop and local area, and the outcome of software modelling which positions the antennas in such a way that they collectively provide 360-degree coverage to the surrounding area. Similarly, the dishes must connect to other base-stations in the wider network by microwave link. As such, they require 'line of sight' which an unobstructed path to neighbouring base-stations.

3.8 The aforementioned factors have informed the design of the proposed equipment which is of the minimum amount and scale possible, while still meeting structural and radio planning requirements.

Equipment cabinets

3.9 The antennas must connect to the proposed equipment housing cabinets by electrical cable feeders. The equipment cabinets, an essential component of the base-station, must be located as close to the antennas as possible in order to minimise electrical power losses during operation.

3.10 The location and small scale of the cabinets in the context of the host building, ensures that they would not be highly visible from ground-level, nor greatly affect its appearance.

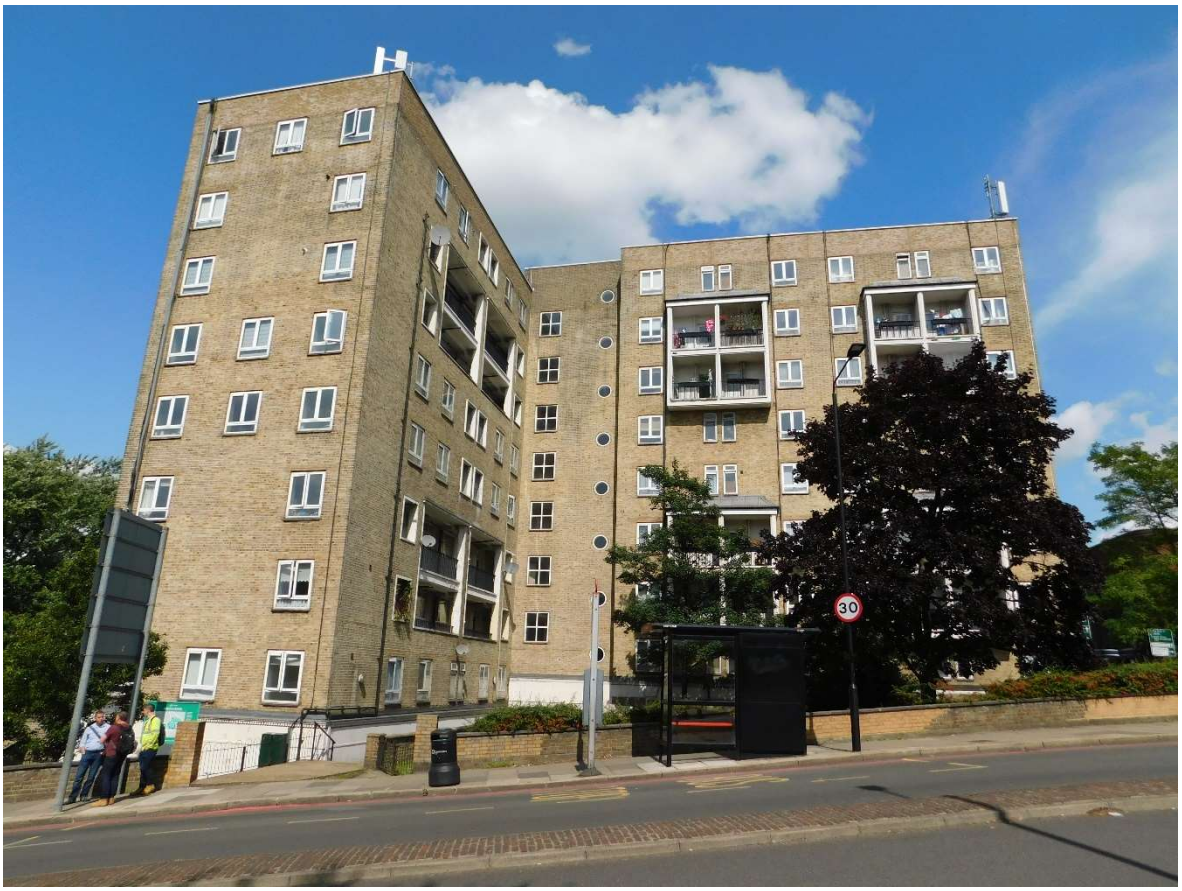


Figure 2. Photograph of host building taken from Hillgrove Road. Existing radio antennas visible.

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, EE and Three operate their network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of EE and Three's networks, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure that 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

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

4.1 The principle aim of the proposal is to replace communications coverage from an operational base-station which will be decommissioned. The proposal is required in order to allow the continued provision of 2G, 3G and 4G mobile connections to the surrounding area. The base-station would also provide new 5G services, introducing ultra-fast mobile connectivity capable of operating the 'Internet of Things'. This upgraded and replacement infrastructure will provide higher mobile down-load speeds and more reliable, quicker phone connections. There would be increased capacity to provide services to a higher number of people at the same time, and improvement in the coverage area.

4.2 Everything Everywhere (EE) and Three – two of the major licenced mobile operators in the UK – presently provides communication services to the surrounding area from apparatus on the Centre Heights building, 137 Finchley Road, NW3 6HY. The existing building is earmarked for redevelopment plans, necessitating permanent removal of the communications apparatus. This has caused a need to find an alternative site to accommodate the base-station.

Figure 3. Application site in relation to base-station to be replaced at No. 137 Finchley Road. Map source: Google.

4.3 Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other by cables or wireless technology 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. There are several variables that determine the size and shape of each cell.

4.4 Base stations are low powered radio transmitters which have a limited range, meaning that they need to be located close to the area requiring coverage. When an operational base-station is lost from the network it leaves a very specific "gap" in coverage within the established network pattern which needs to be filled. The consequence of not doing so is that users of the network would find that the services they previously had access to are either limited or removed. The provision of poor communication services has well recognised economic and social impacts on communities and businesses. Please see enclosed coverage plots and following extract for predicted coverage loss.

Figure 4. Indoor coverage with existing base-station operational. Current situation.

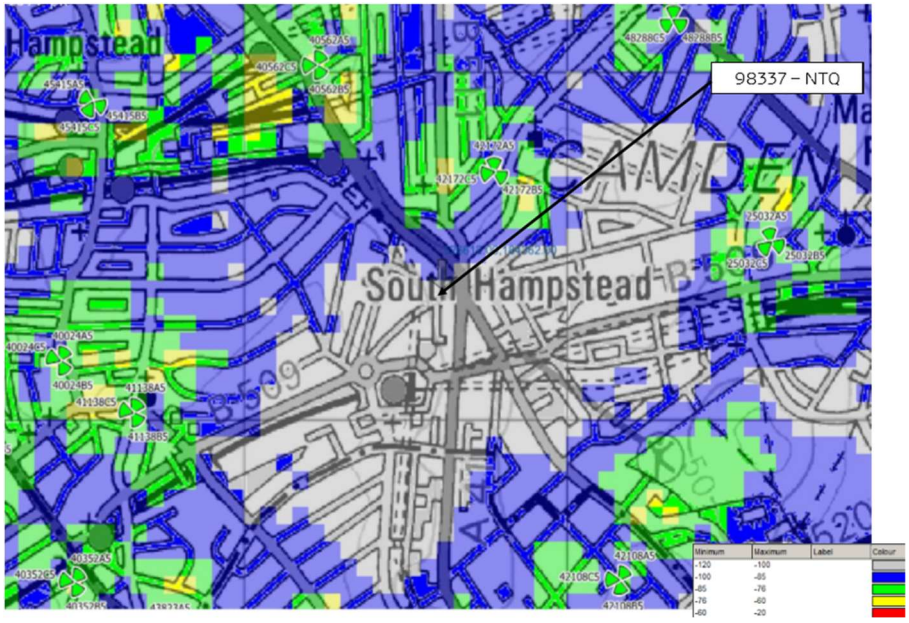


Figure 5. Indoor coverage if existing base-station is not replaced.

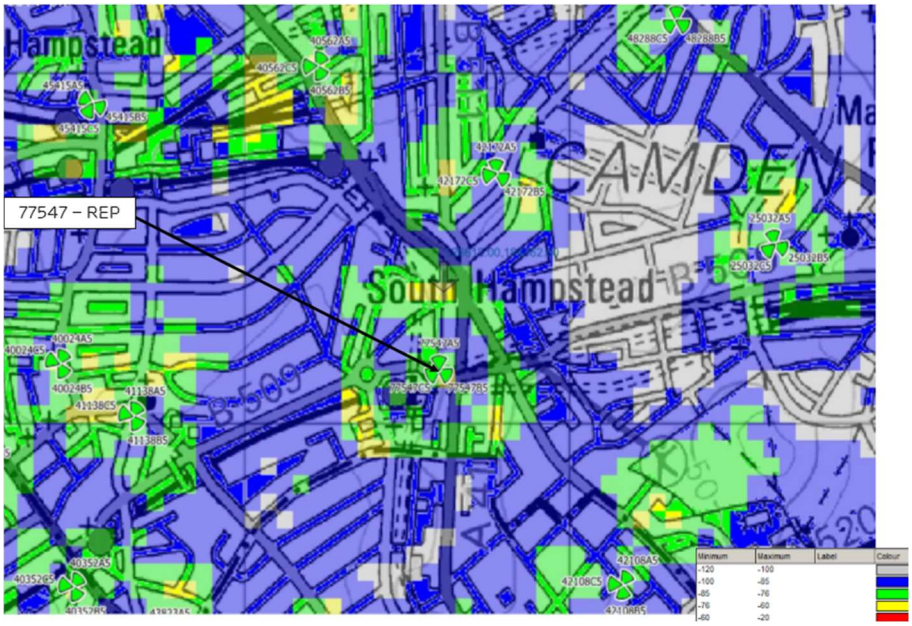


Figure 6. Indoor coverage with replacement base-station at application site.

4.5 Figures 4-6 are extracts from radio modelling software demonstrate the geographical area which would be affected should the operational base-station (ref. 98337) not be replaced. The images show indoor 3G coverage from Three's equipment. Full coverage charts for both operators are enclosed with the application.

4.6 A review of the figures shows that should the proposed base-station (ref. 77547) not become operational then there would be coverage gaps across a large geographical area where service would not be available or would be significantly poorer (compare Figures 4 & 5). The proposal at the application site would successfully replace the predicted loss in coverage area (compare Figures 4 & 6).

5. Site Selection Process

5.1 In accordance with planning policy, a sequential approach to site selection was adopted. The opportunity to site apparatus onto an existing building, and at an existing communication site, was given preference over installation of a ground-based mast.

5.2 The application site was selected following a thorough search and detailed investigations. The decision factored multiple considerations, including:

- distance from the base-station it will replace;
- design of the building, including height and roof-design;
- ability to acquire roof-space;
- physical access to build/maintain the base-station;
- potential for neighbouring buildings & trees to obstruct radio signal;
- minimising environmental impact, including protecting heritage assets.

5.3 Site location is critical in network planning and becomes even more so when there is need to replace an existing base station already operating within the established cellular pattern. When an existing site is lost, it leaves a very specific and unique gap in the network, much like removing a piece from a completed jigsaw would. This gap needs to be re-filled if users living and working within in area are to be able to continue to use their mobile phones and other wireless devices. This places even greater limitations on the potential siting opportunities, as many locations will not enable this specific gap to be adequately filled. The application site is a short distance to the site is will replace (see Figure 3, p7), enabling the existing coverage pattern to be nearly replicated. The site host building is not listed, nor is it in a conservation area designation which cover a large part of Camden.

5.4 The design of a potential host building is also key. The building serves as an elevated platform from which radio coverage is provided to the surrounding area, as such the building must be sufficiently high to enable the radio waves to clear surrounding structures and reach the targeted areas. More specifically, the height of the replacement antennas, and consequently the height of the host building, must be similar that of the antennas that are to be replaced in order to replicate the coverage pattern as closely as possible. Likewise, the roof-top of the building must meet design parameters with respect to having the available space to accommodate the equipment and the structural strength. The application site was found to be suitable replacement building with consideration to these criteria.

Figure 7. 3D image of application site and local context. Image Source: Google Maps.

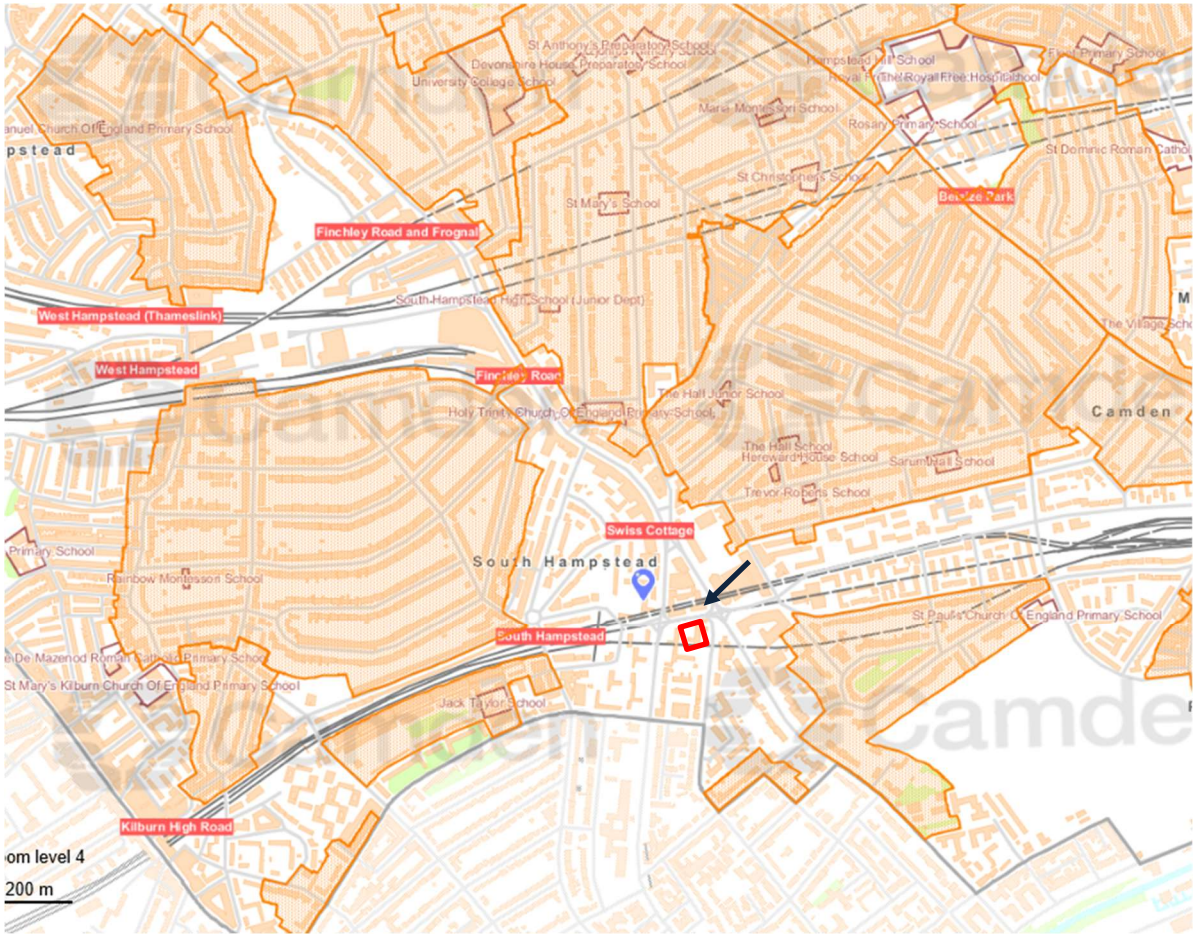


Figure 8. Application site (edged red) in relation to conservation area designations (edged orange).
Image Source: London Borough of Camden.

Alternative sites considered and not chosen:

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
Rooftop	(1) Overground House, Finchley Road, NW3 6HY	526611, 184259	This building is located next to the building which presently hosts the base-station which is to be replaced; therefore, it is ideally located to replace coverage. The building was not selected, however, because of its design. Specifically, part of the rooftop is sloped and features metal sheeting which would not be compatible with affixing of the proposed communications apparatus.
Rooftop	(2) Langhorne Court, Dorman Way, NW8 6NJ	526601, 184008	This building is located beside the application site building and has a very similar design and appearance, meaning it may have been technically suitable subject to detailed assessment. From a town planning perspective, installing apparatus onto this building instead of the application site, would not present any obvious benefits; however, the application site is preferable because it is located closer to the site which is to be replaced.
Rooftop	(3) 16 Northways Parade, NW3 5EN	526630, 184429	These alternative buildings were primarily not selected to host the equipment because of radio planning considerations. These buildings were found to be either unsuitable, or less preferable than the application site, with consideration to the site selection criteria discussed (see p 5). This included considerations such as the distance of the building from the site which is to be replaced; and the design compatibility of the building, including being able to provide a comparable antenna height, essential for effective radio coverage. Furthermore, the application site is owned by the same landlord that owns the site to be replaced and has indicated that they are willing to host the equipment. It is hoped that this will enable a replacement base-station to be established in a timely manor and prior to the live base-station being forced to be decommissioned; thereby avoiding loss or poorer mobile service provision for the surrounding community.
Rooftop	(4) New College Court, Finchley Road, NW3 5EX	526502, 184527	
Rooftop	(5) Elgar House, 11-17 Fairfax Rd, London NW6 4EX	526379 184372	
Rooftop	(6) Byron Court, Fairfax Rd, London NW6 4HB,	526380 184210	
Rooftop	(7) 50 Fairfax Road London NW6 4HB	526380 184210	
Rooftop	(8) Sheridan Court 47 Belsize Road London NW6 4RY	526387 184144	

Rooftop	(9) 57 Belsize Rd, London NW6 4BE,	526318 184076	
Rooftop	(10) Zara café, 95A Fairfax Rd, London NW6 4DY,	526316 184143	
Rooftop	(11) 154 Loudoun Rd, London NW8 0DJ	526390 184019	
Rooftop	(12) Dinerman Court, 38-42 Boundary Rd, London NW8 0HQ	526321 183890	
Rooftop	(13) Southbury 144 Loudoun Road London NW8 0RY	526444 183932	
Rooftop	(14) Quintin Kynaston, Marlborough Hill, London NW8 0NL	526552 183679	
Rooftop	(15) Blair Court, Boundary Rd, London NW8 6NT,	526681 183909	
Rooftop	(16) Buttermere Court, Boundary Rd, London NW8 6NS	526678 183831	
Rooftop	(17) Boydell Court St. Johns Wood Park London NW8 6NG	526725 184078	
Rooftop	(18) Taplow, Adelaide Road, London, NW3 3NU	526922 184230	
Rooftop	(19) The Royal Central School of Speech and Drama, 62-64 Eton Ave, London NW3 3HY	526706 184405	

Rooftop	(20) Harrold House, Finchley Road, NW3 6JX	526480 184488	
Rooftop	(21) Glover House, NW6 4RJ	526435 184428	
Rooftop	(22) 12 Northways Parade NW3 5EN	526625 184453	
Rooftop	(23) Cresta House, Finchley Road, NW3 6HY	526620 184240	
If no alternative site options have been investigated, please explain why: N/A.			

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

Siting and Appearance

6.1 The proposed equipment is permitted development subjecting to applying to local planning authority for a determination as to whether the prior approval of the authority will be required as to the siting and appearance of the development.

6.2 In determining an appeal for a telecom's prior approval application, an Inspector clarified that:

> *'The permission granted under the GPDO is **equivalent to an outline planning permission** and the Council's considerations of the matter are limited to the effects of the development arising from its **siting or external appearance**, not the principle of the development. Although the site is within the Green Belt, it seems to me, therefore, that there is no scope to consider whether the scheme represents inappropriate development in the Green Belt, or whether very special circumstances need to be demonstrated to justify the granting of approval.'* (Ref. APP/C3430/A/12/2172974)

6.3 The preceding sections of the report provide information on siting and appearance. See 'Site Selection Process' (p 10) and 'Reasons for choice of design' (p 4) in particular. The following content elaborates.

Environmental Considerations

6.4 The application site does not fall within any environmental or heritage designation, such as a Conservation Area. The host building is not listed. Importantly, the proposal would ensure continued and improved communication services to the residents, visitors and businesses in the surrounding area, without impacting the heritage of the many listed buildings and conservation areas in the local area. See Figure 8.

6.5 The proposed apparatus would be viewed in the context of a large-scale multi-storey building located in an urban setting. The equipment should not appear alien, nor dominate the building and its surroundings owing to the amount and layout of the apparatus. It is assessed that the resulting magnitude of visual change would be moderate. Likewise, the proposal would not impact the amenity of residents.

6.6 The proposal amounts to a minor change to the appearance of the host building which should be weighed against the far reaching environmental, economic and social benefits of the replacement base-station, which would ensure continued and improved mobile services to thousands of people in the surrounding area, including local residents, business and commuters.

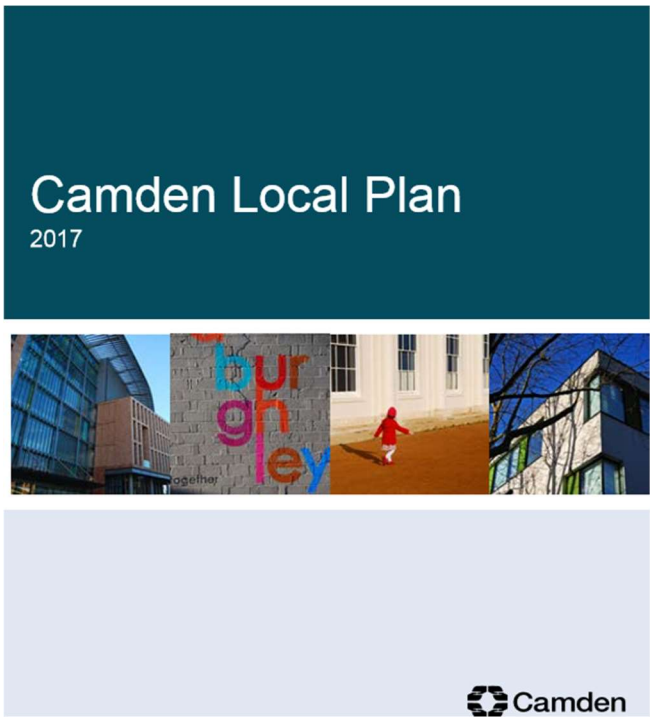
Figure 9. Photograph of application site from A41 Finchley Road. Image source: Google Maps.

Planning Policy Context

Development Plan

7.1 Camden's Development Plan includes the Camden Local Plan (adopted 2017), Policies Map (updated March 2019) and The London Plan (adopted 2016). The application site does not fall within any land allocation or designated area. The proposal is to replace and improve communications infrastructure which would provide public benefit to the surrounding area, including to the neighbouring designated Finchley Road / Swiss Cottage Town Centre, making the policies copied below particularly relevant.

Camden Local Plan



I QUANTITY AND LOCATION OF REATAIL DEVELOPMENT

*'Camden's centres are a **focus for activity and community life** and provide character and identity to local areas and the borough as a whole. They are places of employment, shopping, leisure, and services.'* (para. 9.1)

I POLICY G1 DELIVERY AND LOCATION OF GROWTH

*'The Council will create the conditions for growth to deliver the homes, jobs, **infrastructure** and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough'*

I POLICY DM1 DELIVERY AND MONITORING

*'The Council will deliver the vision, objectives and policies of the Local Plan by working with relevant providers to ensure that necessary **infrastructure is secured to support Camden's growth** and provide the facilities needed for the borough's communities'*

I ENSURING NECESSARY INFRASTRUCTURE IS PROVIDED TO SUPPORT GROWTH

*'It is vital that the transport facilities and services, **utilities** and social infrastructure needed to make development work and support local communities are provided, particularly in the parts of the borough that will experience most growth in future years.*

*In order to support growth in the borough, the Council will safeguard and improve essential social, physical and green infrastructure and work with service providers to ensure the timely delivery of the **new and enhanced infrastructure** needed to ensure that the quality of life of Camden's residents and workers is not harmed.'* (para. 11.9 & 11.10)

London Plan

MAYOR OF LONDON

THE LONDON PLAN

THE SPATIAL DEVELOPMENT STRATEGY FOR LONDON CONSOLIDATED WITH ALTERATIONS SINCE 2011

I ENSURING THE INFRASTRUCTURE TO SUPPORT GROWTH

'What has been said here about energy and water highlights the importance of ensuring London has physical infrastructure adequate for the needs of a growing city, meeting the highest and most modern standards to help us use the city's resources as efficiently and sustainably as possible. ***It will be important for the whole range of utility providers to work together and with the capital's government to make sure London has the infrastructure it needs****, in the places it is needed whether this is the network of substations and power lines distributing electricity, the network of water or gas mains or* ***the wires and fibre optic cables that facilitate the flow of information increasingly important****'* (London Plan, para. 1.38)'

I POLICY 4.11 ENCOURAGING A CONNECTED ECONOMY

'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'***

'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.'

*'****Successful service-based economies like London increasingly depend upon infrastructure facilitating rapid transfer of information****, speedy and easy access to advice and services and a flexible approach to where work takes place and when.'*

'This can also help deliver wider planning objectives, such as reducing congestion on traffic networks at peak hours by supporting forms of home working and facilitating greater economic development in outer London*. Increasingly, this will mean looking to the infrastructure needed to support 'ubiquitous networks' – those supporting use of a range of devices to access ICT services beyond desk based personal computers, and the Mayor will examine the planning issues these might raise.'*

*'****The Mayor wishes to ensure sufficient ICT connectivity to enable communication and data transfer within London, and between London, the rest of the UK and globally.*** *He will work with infrastructure providers, developers and other stakeholders to support competitive choice and access to communications technology,* ***not just in strategic business locations but more broadly for firms and residents elsewhere in inner and outer London****, and to address e-exclusion, especially among disadvantaged groups and small and medium sized enterprises. In particular, he will* ***support the development and extension of high speed connectivity****. Development proposals should ensure competitive connectivity…'* (London Plan, para 4.57)

National Policy

National Planning Policy Framework

Ministry of Housing, Communities & Local Government

National Planning Policy Framework

7.2 The government sets out its national policy objectives for electronic communications in Section 10 'Supporting high quality communications' of the National Planning Policy Framework (February 2019) (NPPF):

'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.'* (para. 112)

'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.'* (para. 113)

UK Digital Strategy

Department for Digital, Culture, Media & Sport

Policy paper
UK Digital Strategy 2017
Published 1 March 2017

7.3 The UK Digital Strategy, published by the Department for Digital, Culture, Media & Sport in March 2017, provides evidence of the public benefits of communication services:

*'****Broadband and mobile must be treated as the fourth utility, with everyone benefiting from improved connectivity****. This will play a crucial role in ensuring that everyone, wherever they live and however they connect, can make full use of digital services and benefit from participation in the digital economy.* ***Improved connectivity also increases innovation and productivity across the economy, bringing significant economic rewards'***

*'****5G is the next generation of mobile connectivity****, and is currently in development. It is expected to represent a significant upgrade: providing* ***ultrafast, low latency, and more reliable mobile connectivity, able to handle our ever-increasing data requirements****. This should present huge opportunities to boost productivity and grow the economy. In addition to giving consumers and business users high quality connectivity, it will also support the development of the* ***Internet of Things: the rapidly-increasing number of connected devices, from connected cars to digital health applications.****'*

Future Telecoms Infrastructure Review

7.4 The Department for Digital, Culture, Media & Sport published its findings of the Government's Future Telecoms Infrastructure Review in July 2018. The review highlights the important and far reaching role of 5G infrastructure:

'Alongside finishing the roll out of 4G networks to meet existing mobile demand, we want the UK to be a world leader in 5G to take early advantage of this new technology. We have set a target that the majority of the population will have 5G coverage by 2027.'

'The technical capabilities and performance characteristics of 5G are clear. ***5G is expected to deliver faster and better mobile broadband services to consumers and businesses, and to enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare****.'* (p 10)

Ofcom reports

Ofcom
making communications work for everyone

Communications Market Report 2019

7.5 Ofcom's annual Communications Market Reports identified trends which demonstrate reliance on reliable mobile connections:

'We all need high-quality communications. In the modern world, a huge amount of our time is spent using communications services: for work, to stay in touch with family and friends, and in order to go about our daily lives. ***Our ability to access and use reliable mobile and broadband connections has become fundamental to the way we work and live, and to the ability of businesses of all sizes to thrive****. For many people, internet connectivity is now as essential as gas or electricity, and access to traditional television, radio, fixed phone lines and postal services continue to remain important.'* (2016 report)

Policy Appraisal

7.6 There is strong support from local and national policy for maintaining and improving the provision of communication services. The Camden Local Plan identifies that Camden's town centres, such as the Finchley Road / Swiss Cottage town centre which the development proposal would ensure maintained and improved service provision to, are a *'focus for activity and community life'* with employment, leisure and other uses. This translates into an area with high demand for mobile data and other services which requires a high capacity upgraded network which the proposal forms part of.

7.7 Policies G1 and DM1 of the Local Plan recognise that growth must be supported by infrastructure to support the needs of those who live and work in the borough. Paragraph 11.9 explicitly identifies that utilities infrastructure *is 'vital'* to *'make development work and support local communities.'* The UK Digital Strategy describes mobile connectivity as the fourth utility.

7.8 Policy 4.11 of the London Plan, and the NPPF, recognise that the latest communications capability is essential to support the growth of service-based economies and promote social wellbeing. The role of communications in facilitating practices which promote sustainability, such as the operation of autonomous vehicles and home working, is also important.

7.9 This proposal would ensure coverage is maintained and increase the capacity of the network to enable reliable digital services to be provided a high number of people at the same time. Modern society and economies cannot successfully operate without the provision of reliable and high-speed communications. This proposal would not only ensure that the existing provision remains available but would also facilitate significant improvements, including by providing 5G services to the surrounding area.

Other Material Considerations

7.10 The following are examples of appeal decisions by the Planning Inspectorate where the Inspector awarded considerable weight to the public need for communications infrastructure, with respect to maintaining and improving network coverage/capacity. The proposal at the application site is required in order to meet the same objectives.

7.11 The first two cases relate to installation of ground-based masts within conservation areas, sited near to listed buildings. The application site is not listed and is not within such a designated area; and it is for building-based apparatus which is sequentially preferable over installation of ground-based apparatus. These factors provide even greater weight in favour of approval. The following case are all Prior Approval.

1) APP/Q3305/W/18/3206555 – Vodafone Vs. Mendip District Council

'In considering the need for the proposal, Government policy, as set out in the Framework states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being… I have found that ***there is a need for the proposal which therefore weighs strongly in its favour….*** *I conclude on this issue that despite the less than substantial harm that would be caused, the* ***public benefits of the proposal would outweigh that harm****.'*

2) APP/M5450/W/17/3180345 - CTIL and Telefónica (O2) Vs. the London Borough of Hillingdon

'The Framework sets out the importance of an advanced highquality communications infrastructure for sustainable growth and makes specific reference to the development of high speed broadband technology. This is reflected in the London Plan and the ***public benefit arising from the improvement of the telecommunications infrastructure is a material planning consideration that weighs in favour of the proposal.*** *Taking account of all matters I have concluded that the limited harm caused to the significance of the heritage asset (the CA) would be outweighed by the public benefit that would arise from improving the communications infrastructure'.*

3) APP/L1765/W/18/3197522 - CTIL and Vodafone Vs Winchester City Council

'I attach significant weight to the public benefit arising from the continuation of local service provision…..Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, my findings are that the proposal's ***public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm*** *arising to the character and appearance of the area.'*

Summary

7.1 The application seeks the authority's approval for the siting and appearance of proposed communications equipment to be installed at Farjeon House. The principle aim of the proposal is to replace communications coverage from an operational base-station which is to be decommissioned. In addition to replacing coverage, the proposal will also result in improved communication services including by increasing the capacity of the network and by the introducing 5G technology.

7.2 Everything Everywhere (EE) and Three – two of the major licenced mobile operators in the UK – presently provides communication services to the surrounding area from apparatus on the roof of the Centre Heights building, 137 Finchley Road, NW3 6HY. The existing site is earmarked for redevelopment plans, necessitating permanent removal of the communications apparatus.

7.3 The application site was found to be suitable replacement building. Specifically, the building is in close proximity and comparable height to the building it will replace, enabling the existing coverage pattern to be closely replicated; there is confidence that roof space can be acquired; and the site is accessible and outside of designations such as conservation areas. The equipment layout and design are based on the principle of meeting operational requirements of the mobile operators, whilst minimising landscape and visual impact as far as technical constraints allow. The proposal amounts to a change to the appearance of the host building to enable far reaching public benefits for the surrounding area.

7.4 The proposal would not only ensure that thousands of local residents and businesses do not experience a loss, or poorer connectivity for their mobile devices, it would also provide upgraded services. Modern communication services have evident social, economic and environmental implications. This includes the mobile's role in providing social and digital inclusion to communities; economic competitiveness by serving businesses in the area; and supporting sustainability objectives such as enabling homeworking, reducing transport congestion and greenhouse gas emissions.

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