SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Haddo House	Site Address:	Haddo House, Highgate Road, Highgate, London, NW5 1PX
National Grid Reference:	528530, 185838		
Site Ref Number:	CTIL_23486120	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: 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:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: Pre-application correspondence was sent to the Local Planning Authority by email on 22nd November 2019. To date, no response has been received. It was decided to proceed without formal advice straight to a planning application.	

Community Consultation

[1] Macro or Micro

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

Outline of consultation carried out:

As with all Cornerstone proposals, the site and proposed works were assessed against the Traffic Light Model contained within the Code of Best Practice on Mobile Network Development. An amber rating was assigned in this instance and pre-application consultation letters were sent by email on 22nd November 2019 to the Highgate Ward Representatives; Councillors Berry, Lewis and Wright. A pre-application consultation letter was also sent to the Holborn and St Pancras Constituency.

On 22nd November 2019 pre-application consultation letters were also sent to 110 residential properties on Highgate Road, Gordon House Road and Glenhurst Avenue. A full list of consultees was provided to the Local Authority on 22nd November 2019. This can be provided again on request.

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

A response from Councillor Lewis was received on 25th November 2019 with queries regarding the visibility of the proposed equipment from the front of Highgate Road. Councillor Lewis also had questions he wanted addressed regarding health and safety implications of living underneath a radio base station, noise impacts, listed building concerns and the visual impact of the proposal.

6 resident responses were received. The main objections raised were:

1. Sound
2. Conservation Area
3. Alternative locations would be more appropriate
4. Visual impact
5. Health impact

On 26th November 2019 a response was received from the Chair of the Resident Association, the agent was made aware that a petition had been made to the landlord, objecting to the use of the rooftop on the grounds of the below points. The agents direct consultation with residents of the block generated a similar response, however, further information is now provided on the issues known to have been raised as points of particular concern.

A response and additional information was provided to all objectors during the consultation period.

Sound

No sound will be emitted from the base station and due to the location of the equipment on the rooftop there will be no noise impact to residents nearby. The cabinets are the only pieces of equipment with the potential to cause vibrations, and these will be securely installed to the building, and any vibrations will be dampened in the process.

Conservation Area

It has been noted that the proposal will be located within a Conservation Area, however, it is not possible to meet the Government's aims of providing a comprehensive communications network (which is recognized as an essential service), across the UK and also categorically avoid designated areas. It has been recognised by many Local Authorities and repeatedly by the higher Planning Authority, the Planning Inspectorate, that telecommunications development can be acceptable within these areas and that due weight must be afforded to the public benefits of connectivity when assessing the potential impact of development proposals.

Alternative locations would be more appropriate"

This matter relates directly to the appropriateness of the selected site and so is pertinent to the assessment of a prior approval application. The site selection process and consideration of alternative options is addressed in detail within section 5 of this

statement, where it will be demonstrated that a comprehensive search of the area was undertaken, during which a number or alternative locations were considered. None proved to be both technically superior and have greater planning merit than the selected option.

When seeking a suitable location for a new site, there are a whole host of parameters to bear in mind, including: The relationship between the location of the proposed site and existing sites within the network; technical requirements; planning considerations (statutory protections, as well as consideration to what can be feasibly achieved with a design that will be visually appropriate); building considerations (whether a site offers the required flexibility to achieve the necessary antenna orientations and heights, which can be very specific requirements and not simply a case of protruding above a certain level, as well as structural feasibility and availability of power or fibre connections, amongst other things); the presence of natural or manmade features at, or near to, the location that might block or clip signals or prevent full propagation within the target coverage area; the relationship of the site to the target area in terms of height (for example, siting on a very tall building where coverage is required in a dip can be prohibitive, and can also lead to interference with neighbouring cells); as well as land variances within the target area and other area specific attributes.

It is with all these aspects in mind, that the applicant determined the selected location as the most suitable to meet the network's coverage need. The building provides an ideal location to fulfil the technical requirement and a suitable rooftop to support a base station, and offers existing rooftop features which are able to minimise visual impact on the skyline and to the surrounding area.

Visual Impact

Visual impact is a key element in assessment of any prior approval application and attention is respectfully directed to section 5 of this statement where a detailed assessment is provided.

Objections were raised by residents regarding the visual appearance of the apparatus. It is acknowledged that views of the equipment could be available, however, every effort has been made to minimise the visual impact of the site. The host building has been selected as it is an existing structure and will allow the equipment to have some visual screening by the surrounding mature trees and the development in the area. Views of the site will be relatively small area owing to road layouts, intervening developments, and the topography of the area.

The decision was made to deploy equipment on the rooftop as it allows the character of the area to remain the same as the equipment will not be directly visible from ground level. The cabinets have been strategically located in a neat arrangement at roof level and will be set back from the edge of the rooftop. 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.

Health Impact

Paragraph 116 of the National Planning Policy Framework ("NPPF") is very clear that Local Authorities should not set health guards different to the International Commission Guidelines for public exposure. This is reference to the Independent Commission for Non-Ionising Radiation Protection ("ICNIRP"). Thus, if a development proposal complies with ICNIRP guidelines, health issues should not be considered in the assessment of an application for that development.

A declaration of compliance is included within this application.

A factsheet on health and mobile base stations also accompanies the application as supplemental background information for those seeing further guidance on the subject.

'Implications of living underneath a radio base station'

All telecommunications installations are designed to comply with the precautionary International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure guidelines as adopted in a European Union recommendation. The UK Government and Public Health England support this view. A declaration of ICNIRP compliance is submitted with any planning application for new, or upgrades to existing, sites. The ICNIRP declaration takes into account the cumulative effect of the emissions from the proposed installation and all radio base stations present at, or near, the proposed location.

Antennas are directional and therefore do not point down towards the roof of the building they are being installed on. Our designers deliberately decide a height and angle for the antennas that ensures the signal will clear the edges of the rooftop and face outwards to propagate throughout the surrounding area and deliver the required network improvements. If the antennas pointed downwards to the flats underneath the equipment then the site would not operate correctly or provide the network improvements.

Listed Building Concerns

According to Historic England the application building is not designated as listed.

School/College

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

A search for schools and non-domestic childcare institutions was conducted via Ofsted and Department for Education databases. The nearest school was Parliament Hill School located approx. 205m away and the Spanish Nursery is located approx. 207m away.

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

Pre-application consultation letters were sent to Parliament Hill School and the Spanish Nursery on 22nd November 2019.
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: No airfields are within 3km of the site.		

Developer's Notice

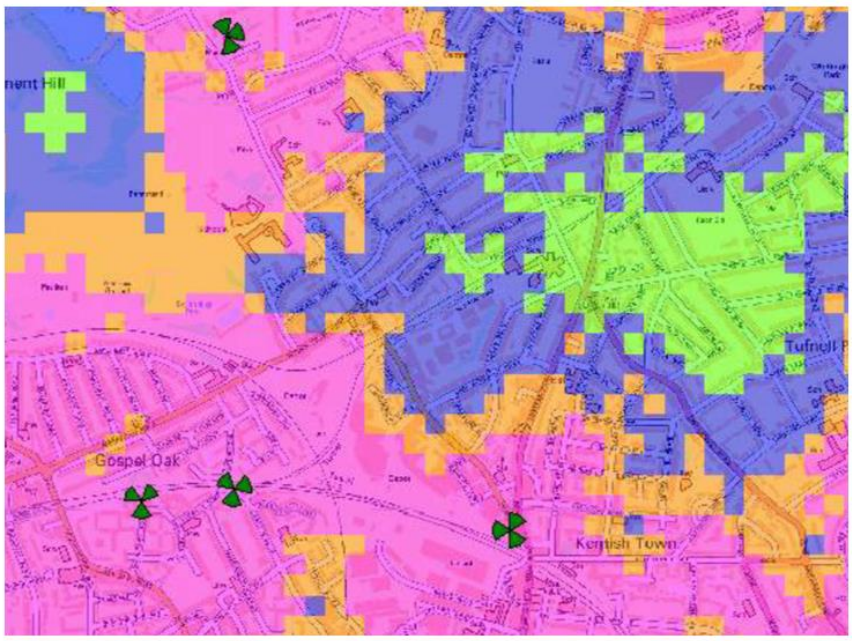
Copy of Developer's Notice enclosed?		**Yes**	No
Date served:	23rd March 2020		

3. Proposed Development

The proposed site:
The application site is located on Haddo House, an nine-storey residential block, located on Highgate Road to the west of its junction with Gordon House Road. The building is set within an area which has high-level and dense patterns of residential development. The application site on the rooftop of an existing structure, provides an excellent town planning solution and ensures that network coverage will be continuous. The use of existing buildings for telecommunications sites is supported by National Planning Policy as it prevents the site being located in a more densely populated area where there are fewer opportunities to screen it, so to minimise any visual impact further. The specific aim of this proposal is to provide new and improved 2G, 3G, 4G and 5G network coverage for Telefonica in the area. In order to achieve this, a site must be identified in reasonably close proximity to the community it is designed to serve. The proposed site is located within Dartmouth Park Conservation Area. As the proposed installation will be located on the rooftop, the equipment will not have a detrimental impact on the surrounding area.

Enclose map showing the cell centre and adjoining cells if appropriate:
Coverage plots provided by the Network Planner, demonstrating the need for the new site for Telefonica's network are enclosed. The plots show existing deficiency in the area for network coverage, and the significant improvement predicted once the application site is integrated into the networks, represented by the pink and orange shading. It is clear that the proposed installation will fill a substantial coverage gap within Highgate, particularly to the properties along Highgate Road, Gordon House Road, Dartmouth Park Road, Grove Terrace, Chetwynd Road and Glenhurst Avenue. These plots do not show the improvements to the capacity of the network, which will also be significantly improved. For example, an area may be coloured "pink" indicating a strong signal strength, but if there is a heavy network demand in these areas, the network might not have the available capacity to provide a stable and fast connection to the users.

CTiL – Existing Telefonica Coverage

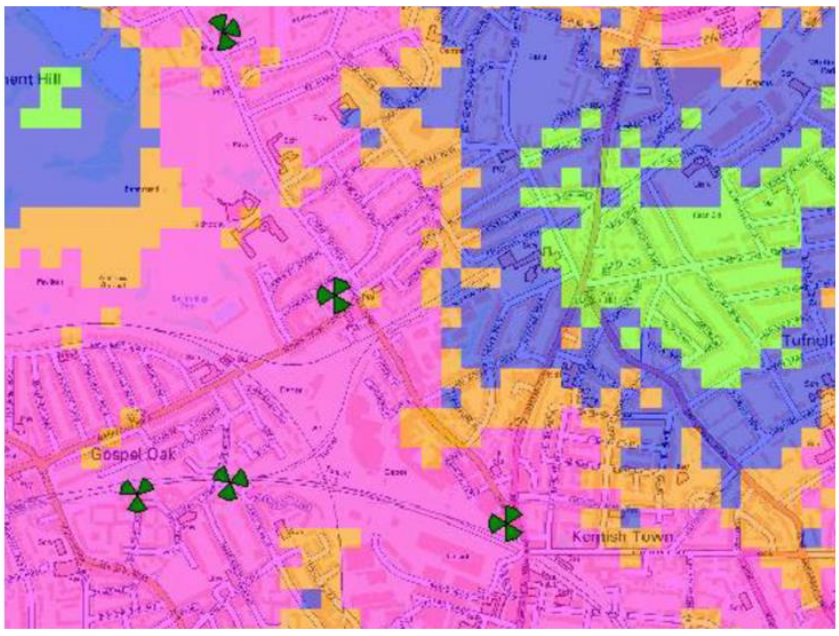


3G Coverage by Signal Level
- Indoor Dense Urban
- Indoor Urban
- Indoor Suburban
- In Car
- Outdoor

This coverage plan must be read in conjunction with the key and site specific supplementary information. Each colour block represents 50 metres square.

CTiL

CTiL - UMTS Telefonica (3G) Coverage with 79366



3G Coverage by Signal Level
- Indoor Dense Urban
- Indoor Urban
- Indoor Suburban
- In Car
- Outdoor

This coverage plan must be read in conjunction with the key and site specific supplementary information. Each colour block represents 50 metres square.

CTiL

Type of Structure *(e.g. tower, mast, etc):*	
Description: The proposed development consists of the installation of 3No. antennas, 3No. cabinets, 1No. meter cabinet at ground level and ancillary works thereto. 2no. cabinets with dimensions 750mm(w) x 600mm(d) x 1975mm(h) 1no. cabinet with dimensions 700mm(w) x 750mm(d) x 1800mm(h) 1no. meter cabinet with dimensions 655mm(w) x 264mm(d) x 1215mm(h)	
Overall Height: 25.8 Metres to the top of antennas	
Height of existing building *(where applicable):*	25.19 Metres
Equipment Housing:	
Length:	As above
Width:	As above
Height:	As above
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Support poles- Galvanised 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:
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 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 cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air 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), feeder cables that link the equipment housing to the antennas and the various 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.

To achieve the required coverage and network improve for Telefonica 3no. antennas are required. With reference to drawing numbered 301, the antennas will be installed on three areas of the building, 1no. antenna will be located on the east side lift motor room, 1no. antenna located on the east side of the building at the rooftop edge and 1no. antenna located on the west side of the building at the rooftop edge. The height to the top of the antennas measures 25.8m which is 0.61 metres higher than the existing height of the building. It should be noted that the antennas need to be installed at this height and location so that they are able to clear surrounding clutter and avoid clipping. If the antennas on the east and west corner were to be relocated to the centre of the application building, they would need to be installed at a higher level to avoid clipping from the rooftop edges, either located on taller support poles or on the top of the lift turrets. The applicant deems that this relocation would increase the visual impact to the area as the site would be in view from a wider area.
A GRP solution has also been considered at this site. However, given the distinct design of the circular rooftop lift turrets and technical requirement for the positioning and heights of the antennas, it has been discounted. This is due to the fact that a design with GRP would add a larger amount of visual clutter to the rooftop than an unshrouded design, and a shrouded design would not be possible that would be in keeping with the existing rooftop features and also be able to fulfil the technical requirement.

Radio signals are generated within radio equipment housing cabinets and 3no. equipment cabinets are required at this site and 1no. meter cabinet. With reference to drawing numbered 301, the 3no. cabinets will be positioned in a neat arrangement at roof level and set back from the edge of the rooftop on the east side of the building against the side of the buildings upper roof level. Views of the cabinets located here would be limited or not possible from beyond the rooftop. 1no. meter cabinet will be located at ground level on the east side of the application site. The meter cabinet has been positioned against to the eastern edge of the property to ensure that the visual impact is kept to a minimum.

It is considered that this design is appropriate at this location, enabling the proposed installation to be assimilated into its environment without significant adverse impact on neighbouring properties or the wider visual amenity and maintaining the character and appearance of the surrounding conservation area.

As detailed, all apparatus required will play a vital role in the provision of 2G, 3G, 4G and new 5G services for the Telefonica mobile network. 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, is avoided. It is considered that this proposal offers the optimum solution in terms of environmental impact. 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

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	**Yes**	No

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 development will enable the provision of 2G, 3G, 4G and new cutting-edge 5G services for the Telefonica mobile network in this part of London. 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 Telefonica to provide improved network services to the surrounding area, will assist in achieving these objectives within Camden.

The Planning Inspectorate too has in recent years continually recognised the importance of this issue and cited it in appeal decisions that have overturned the decisions of local authorities across the UK where there has been a failure to apply due weight to the value of connectivity to social and economic prosperity in the assessment of applications made for telecommunications development, even in or close to protected or sensitive areas. As an example, in October 2018 the decision of Winchester City Council to refuse Prior Approval for the installation of a 17.5m high monopole and associated equipment housing, required to replace an established site being lost from Vodafone's network, was overturned by the Planning Inspectorate (CTIL and Vodafone Vs Winchester City Council, appeal reference APP/L1765/W/18/31975). Within the decision notice, the Inspector stated that:

"I attach significant weight to the public benefit arising from the continuation of local service provision…..Having regard to all relevant considerations... 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".

Research by TouchPoints in 2017 found that 64% of adults in Great Britain agreed that the internet was an essential part of their life, up from 54% in 2012. Among under-35s, more than 80% agreed, but the steepest increase was among over-65s, with 36% considering the internet to be essential, up from 22% five years previously. This shows that all ages of society are now utilising and valuing being connecting, aiding in the transformation of telecommunication services being viewed as an essential utility, rather than a service.

In this instance, the benefits of enhanced connectivity services can be achieved at this location through the very small height increase to the building and is therefore considered to be a wholly appropriate planning solution.

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)

When considering a new site for telecommunications equipment, there are many factors to be considered, not least the aesthetics of the site and planning considerations, but also the need to meet the network's requirements. The applicant has expended considerable time and efforts in identifying a suitable site which balances the coverage requirements with a host of other aspects, including the siting and appearance of the installation.

Potential sites are considered in terms of their technical suitability to provide the required level of service, the effect on visual amenity and their ability to be acquired, built and maintained. The aim of site identification is to find the most technically efficient site, which has the minimum impact on visual amenity. Various options might theoretically be suitable in terms of one of these considerations, but not the other. A balance between the two must be achieved.

The area from within which a site will be capable of providing the desired coverage, the "search area", is determined by the Network Specialist. In this case the area was made up of a coverage hole in this part of Kentish Town.

A number of potential locations were investigated. Their locations are indicated on the map below and the reasons they were not selected for progression contained within the table overleaf.

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
1)Rooftop	Chester Court, Lissenden Gardens, NW5 1LY	528374, 185754	This site has been nominated previously, but the proposed design's planning application was refused (2017/1353/P).
2)Rooftop	Salcombe Lodge, Lissenden Gardens, NW5 1LR	528380, 185732	This building is adjacent building to, and very similar to the rooftop of option 1. It is anticipated that a proposal on the rooftop will be deemed in the same manner as (1).
3)Rooftop	Heathview, Gordon House Road, NW5 1LR	528447, 185696	Compared with the nominated option, the building here represents a less preferred option to provide radio coverage to the

			surrounding area due to the reduced height of the building.
4) Rooftop	Parliament Hill Mansions, Lissenden Gardens, NW5 1NA	528364, 185789	These buildings are adjacent to the previously nominated option at Chester Court (1) and is deemed an inferior planning option in terms of visual impact a site would bring.
5) Street Furniture	Land opposite Woodsome Road, Highgate Road, NW5 1PL	528425, 186056	Due to the prevalence of mature trees along Highgate Road, a street furniture option along here would need to have a significant height to prevent tree foliage obstruction of the radio signal. A tall structure along the stretch of road would have a notable visual impact on the area.
6) Rooftop	Lissenden Mansions, Lissenden Gardens, NW5 1QN	528464, 185901	Compared with the nominated option, this option within this rooftop would have a greater visual impact, whilst being at a lower height, reducing the effectiveness of the radio equipment to provide coverage to the target coverage area.
7) Greenfield	Amey Depot, Gordon House Road, NW5 1LT	528311, 185677	A proposed site here is located too far south to provide optimal coverage to the target coverage area, and is in close proximity to an existing O2 base station. A greenfield site here would require substantial height to be able to provide coverage to the target area, and utilisation of existing structure is preferred compared with the creation of new structures.

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

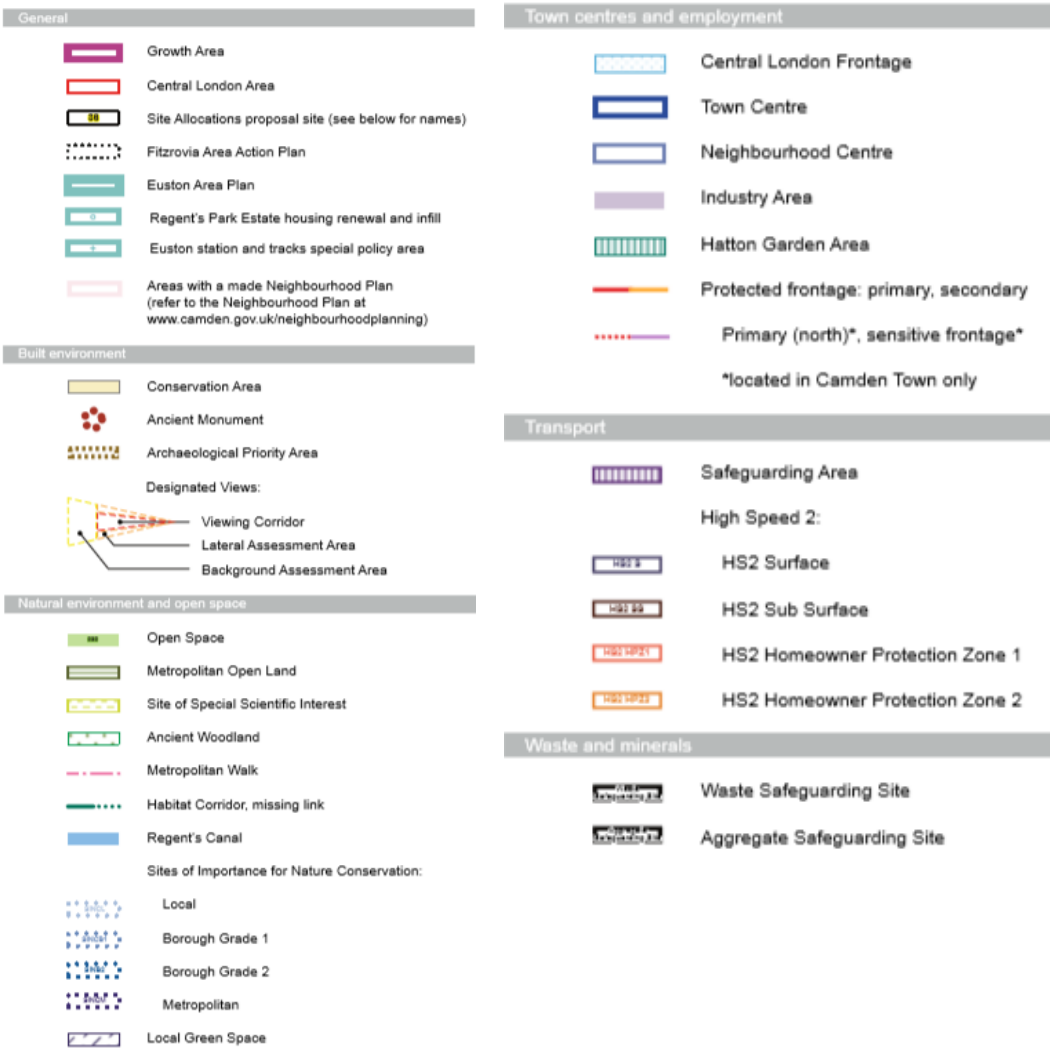
N/A

The applicant has undertaken a comprehensive search process during which all reasonable potential alternatives siting option have been discounted.

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

The application site is not ecologically sensitive and there is no evidence of any protected species or their habitats in this location.

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



The above map and key is taken from Camden's Proposal Map in Camden's Local Plan (adopted July 2017) and confirms that the site is located in Dartmouth Park Conservation area.

The Dartmouth Park Conservation Area Appraisal and Management Statement (adopted January 2009) reveals that the area has been classified as a designated area due to the special architectural and historic interest of this area. The area is made up of late 18th century terraces which contrast with contemporary housing estates; tiny cottages, large mansion blocks and Victorian villas, all existing together. The semi-rural quality of this area on the fringes of the Heath, is also an important aspect of the area. The proposed installation will not hinder this Conservation area as installing telecoms apparatus on a rooftop allows the character of the area to remain the same as the equipment will not be directly visible from ground level. The building is not designated as listed according to Historic England and the surrounding Heath will not be adversely affected by visual impact.

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

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.

The applicant gives due regard in designing all new sites to limit the visual impact through good design. In this instance the proposed installation is subject to technical and build constraints. That notwithstanding, it is submitted that the appropriate siting and design put forth will mitigate any potential impact on the site and its surroundings to acceptable level.

It is acknowledged that views of the equipment will be available, however, every effort has been made to minimise the visual impact of the site. The host building has been selected as it is an existing structure and will allow the equipment to have a large degree of visual screening by the surrounding mature trees along Highgate Road and Glenhurst Avenue and the development in the area. The equipment has been designed so that it does not protrude the skyline of the area. Any equipment will benefit from the visual screening provided by the lift motor rooms located on the rooftops highest point, therefore further minimising any visual impact.

The antenna apparatus has been kept as low in height as technically possible. The height and position of the antennas is necessary so that the radio signal is not clipped by the roof-edges. If the antennas were moved back then they would be clipped by the rooftop edges, unless taller support structures were used. Pole mounts are simple and in this case considered more visually appropriate than grouping the antennas in a much taller, more robust structure. It is important to note that 5G network coverage is more susceptible to clipping and therefore the antennas have been appropriately positioned to account for this so they are able to operate effectively. The proposed equipment cabinets will be arranged neatly against the side of the higher roof level set back from the roof-edge and so will not be readily visible from street level. These cabinets will not be viewed from ground level and pose minimal visual impact to the amenity and character of the surrounding area. Although there is a relatively substantial amount of equipment proposed, it is considered its appearance would not appear excessive due to the height of the building. Any impact would be outweighed by the significant benefits of the proposal, achieving continued and enhanced coverage to the area for Telefonica.

If the antennas were moved back then they would be clipped by the rooftop edges, unless taller support structures were used. Pole mounts are simple and in this case considered more visually appropriate than grouping the antennas in a much taller, more robust structure.

Please find the enclosed photomontages within this application, which illustrate views of the equipment from different angles. When the photographs for the photomontage were taken, scaffolding was present on the front face of Haddo House. Whilst we appreciate that the scaffolding is a temporary fixture and does not represent the regular appearance of the building, the rooftop remained unobscured by the scaffolding and therefore the photomontage is still capable of demonstrating

what the difference in visual appearance to the rooftop will be due to the base station installation.

From the photomontages you can clearly see that the proposal does not cause a detrimental effect to the visual amenity of the area or surrounding Conservation area. In image 1b of the proposed view of Haddo House from Glenhurst Avenue looking East, the equipment does not protrude the skyline and camouflages with the colour of the building. Whilst the proposed colour scheme is considered wholly appropriate for this site, the applicant would be willing to adhere to any colour scheme deemed more appropriate by the local authority.

With reference to image 2b, taken from the junction of Highgate Road and Glenhurst Avenue, again the proposed equipment does not dominate the skyline and due to the location of the antennas on the rooftop from this angle they cannot be seen easily. The surrounding mature trees in the area offer some visual screening to ensure views of the base station are extremely limited.

Referring to image 3b, the trees located in front of Haddo house when viewing the site from the junction of Dartmouth Park Road and Grove End provide further screening. The equipment is well camouflaged on the rooftop and does not appear an incongruous feature within the existing landscape thus preserving the character of the Conservation area.

From image 4b and 5b, views of the proposed equipment is extremely limited and cannot be seen from a distance. As such, it is considered the appearance of the proposed equipment would not appear excessive due to the height of the building. The equipment benefits from visual screening provided by the two existing lift motor rooms on the rooftop, further minimising any visual impact.

Finally, with reference to image 6b, when viewing Haddo House from Gordon House Road looking east the antenna equipment is visible. However, as previously mentioned this equipment does not protrude the skyline and the colour of the antenna is well disguised against the sky.

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the less than substantial harm is may impose on the surrounding area being balanced by the provision of replacement and enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

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 for Telefonica 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".

It is confirmed that there is no opportunity to utilise an existing telecommunications site to meet the technical requirement in this instance. The proposal does seek to utilise a building to meet that need, in direct compliance with paragraph 113. This singular proposal will also provide coverage for multiple technologies for Telefonica and therefore is in line with the above requirement.

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". Compliance with these guidelines (ICNIRP) is confirmed and a declaration of such is included with the application.

In summary, 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.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 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.

For the purposes of Section 70, the current adopted development plan for Camden Council, relevant to the proposal comprises:

- The London Plan: Spatial Development Plan for Greater London;
- The Camden Local Plan (2017) and the Site Allocations Plan (2013).

<u>The London Plan</u>

The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. 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 applicants' network is an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in Policy 4.11 'Encouraging a Connected Economy' of the Plan, which states that:

"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 broadband access meeting the needs of 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."

At paragraphs 4.56 and 4.57 of the supporting written justification to policy 4.11, 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*" and "…*support ubiquitous networks – those supporting use of a range of devices to access ICT services beyond desk-based personal computers..*" Furthermore, at paragraph 4.57, the Mayor states the intention 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 amongst disadvantaged groups*…"

Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing Telefonica to provide new and enhanced coverage to the surrounding area.

Local Plan

There are no policies relating directly to communications development within the development plan documents. General policies of relevance include D1 (Design) which requires a high standard of development, and policy D2 (Heritage), which 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.

It is considered the proposal complies with both policies. The scheme has been specifically designed for this location. The host building is substantial, and the proposal would have a minimal impact on the application site and the surrounding Conservation area. Although visible from certain viewpoints any impact would be minimal, due to the building height and the location of the equipment. Although the building is located within Dartmouth Park Conservation Area, the sympathetic design ensures there would be limited harm to the heritage asset.

Also, of relevance is Camden Planning Guidance – Digital Infrastructure (2018). This document sets out as a key message that "The Council will support the expansion of electronic communications networks, including telecommunications and high speed broadband" and goes on to set out that proposals for telecommunications equipment will be determined in accordance with the National Planning Policy Framework (see section above).

The proposal therefore complies with the above policies and no conflict with any other aspect of the plan has been identified.

Summary

National Planning Policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for a continued and improved quality of service.

This application involves the installation of a new telecommunication site to provide new and improve coverage to the surrounding area for Telefonica and Vodafone. The installation has been designed to minimise the visual impact to the surrounding area as much as possible. Installing telecoms apparatus on a rooftop allows the character of the area to remain the same as the equipment will not be directly visible from ground level. It is considered the proposal complies with both national and local policy. It is of significance that the development ensures a continued provision of local community facilities and services.

The proposal is fully compliant with ICNIRP guidelines.

On balance, the application warrants support and there are no material considerations that indicate otherwise.

Confirmation that submitted drawings have been checked for accuracy

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