SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Highstone Mansions	Site Address:	Highstone Mansions, 84 Camden Road, Camden, London, NW1 9DY
National Grid Reference:	E: 529173 N: 184106		
Site Ref Number:	CTIL ID. 208257_21 TEF. 78560 VF. 13779	Site Type:	Rooftop Macro

2. Pre Application Check List

Site Selection

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	**No**
London Borough of Camden does not produce an up to date mast register		
Were industry site databases checked for suitable sites by the operator:	**Yes**	No
The applicant has consulted with industry databases to identify the position of existing telecommunications installations relative to the application site. Consistent with dense urban population and business centres such as London, and the Camden Town Centre area more specifically, there is a relatively high frequency of existing telecommunications installations in the surrounds, this being consistent with the very high levels of network demand.		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	28th January 2020 (via letter sent recorded delivery)
Name of contact:	Joshua Ogunleye
The applicant attempted to enter into formal pre-application discussions with the Council, submitting a written request on 28th January 2020 together with payment of the relevant fee.The pre-application enquiry was ascribed reference number 2020/0539/PRE. A context for the proposal was provided together with a description of the development, draft scheme drawings and details of discounted options. The applicant has made several attempts to contact the Council to discuss the pre-application submission, offering site meetings or telephone calls on various occasions. Unfortunately, the Council has not responded to this pre-application request and the applicant must progress with the submission of a planning application to ensure the timely and efficient roll out of the communications network across this part of London.	

Community Consultation

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

The applicant has written to Local Ward Councillors (Cllrs Cotton, Pietragnoli and Callaghan) as well as the Local Planning Authority. A letter was sent to the Office for the MP of Holborn and St Pancras, Sir Keir Starmer. Letters were also sent to a selected number of residents in the immediate surrounds.
Summary of outcome/main issues raised: A number of local residents responded to the consultation. Responses can be summarised as follows: - Concern over the deployment of the telecommunications network in relation to impacts on health; and - Concern over the appearance of the equipment proposed. Wherever specific questions were raised, the applicant responded directly to these queries.

School/College

No local schools were identified as 'near' the proposal or to be candidates for pre-application consultation, when measured against the criteria listed in Appendix C of the Code of Best Practice (2016). Accordingly, no letters to schools were sent as part of the consultation exercise.

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** (as noted within the application covering letter)	No
Date served:	15/04/2020		

3. Proposed Development

Background Cornerstone (acting on behalf of Vodafone Ltd and Telefonica UK Ltd) are in the process of progressing a suitable site for Telefonica's equipment situated on a rooftop of a tall building within the vicinity of Camden Town Centre capable of providing their latest 4G and new 5G technologies. 5G rollout has begun and both Vodafone and Telefónica are in the process of upgrading their existing radio base stations across the Camden area and deploying new sites where required in order to facilitate their single grid network wherever possible. As part of Vodafone and Telefónica's continued network improvement program, there is a specific requirement for a new installation at this location to provide improved 2G, 3G, 4G and new 5G coverage and capacity, ensuring that this area of Camden has access to the latest technologies. The 3G and 4G provision allows internet access, video calling, data streaming, accessing social media networks and emailing to name just a few of the benefits. Therefore to maintain high quality indoor 3G

and 4G services into this area would promote activity in line with the general population demand as the ownership of smart devices increases. New 5G service provision will bring faster, more responsive and reliable connections than ever before.

The operator is limited in siting options as there is a requirement to provide new coverage and capacity for this area of Camden. The requirement that a new site assimilate within the existing communication network in an effective and efficient manner means that the operator has to be located in a location where existing coverage is poor and the uplifting effect of the new equipment will be maximised. The application site is the nearest suitable location that the operator is able to position their replacement apparatus. Details of the applicant's search for alternative sites is provided elsewhere in this document.

The Proposed Site

Centred at Grid Reference E: 529173, N: 184106, the application site is comprised of parts of the roof of 84 Camden Road (also referred to as Highstone Mansions) where a relatively small part of roof space is required to deliver the proposed equipment. 84 Camden Road is a mixed use apartment block comprised of 7 floors where retail units are situated at ground floor level with residential apartments above. The building is predominantly of brick construction, measuring 20.2m to the main roof level with a parapet running around the circumference of the roof. A plant room is situated toward the centre of the roof. There is no existing telecommunications equipment situated at rooftop level.

The building is not listed or locally listed but it is noted to fall within the Regent Canal Conservation Area, itself a designated heritage asset. It is noted that the bridge to the immediate south of the site which provides a road and pedestrian crossing of the Regent Canal is grade ll listed.

The proposal site is situated on Camden Road (A503), itself a busy arterial road through the Borough. The land use in the surrounding area is mixed with numerous examples of other residential apartment blocks, offices, retail units and transport infrastructure hubs including Camden Road Overground station, within the immediate surrounds. There are also numerous examples of existing street furniture in the surrounds which contribute to the context of the proposal site. These include lampposts, road signage, bus stops and isolate mature and semi-mature trees. These factors contribute to a 'busy' urban street scene that is consistent with the location of the site, close to Camden Town Centre and adjoining a major piece of highways infrastructure.

The building is taller than the buildings either side and opposite. For reasons explained elsewhere in this statement, taller buildings are generally better suited to telecommunications installations than small buildings as the high positioning of antennas allows for a greater area of coverage which in turn results in more efficient network and ultimately means fewer telecoms sites are required.

Type of Structure: Pole mounted antenna situated at three separate parts of the roof together with new steel platform to support cabinets.

Description:

The proposal includes equipment required for the expansion of the Telefonica UK Ltd (O2) and Vodafone communication networks. In total, 12no. antenna are proposed which together with the 300mm dishes, equipment cabinet and other ancillary equipment will provide the coverage from the site.

The antennas themselves are separated to be deployed in three district parts of the roof. This separation is necessary since each antenna is specifically orientated to cover a particular azimuth. Each antenna location will feature 4no. antenna (2 for each operator) which will be instllated on a steel frame fixed to the parapet. The antennas will measure 23.5m to the top, 3.2m above the height of the main roof level. The proposed site plan drawing shows that antenna locations are situated at the southern, north east and north west parts of the roof thereby allowing for a 360 degree range of coverage from the site.

Each antenna location will also feature a 300mm dish mounted to the same steelwork that the antennas will be fixed to. Dishes are required to allow the installation to communicate with the wider telecommunications network.

3no. equipment cabinets are proposed, these being situated in the centre of the roof and installed on a cantilever steel frame fixed to the plant room wall.

Other ancillary equipment proposed includes remote radio units for the purpose of amplifying radio signal to the antennas, cable trays and associated cabling as well as handrails to provide for a safe working environment at roof top level.

Overall Height: 23.5m to the top of proposed antennas	
Height of existing building:	20.2m to the roof level, 22.6m to the top of the plant room

Equipment Housing:

1no. ICD 42U Mk4 Flexi Rack (2300mm x 1066mm x 762mm);

1no. Eltek 4th Gen PSU (2000mm x 770mm x 700mm); and

1no. VF CSC (800mm x 660mm x 1770mm).

Materials *(as applicable):*	
Antenna – type of material and external colour:	Galvanised steel support pole with white heavy-duty antenna
Equipment housing – type of material and external colour:	Steel, typically dark green

Design Justification:

It is acknowledged by the applicant that new telecommunications facilities can be installed in a variety of places, using a variety of construction techniques and several design solutions were considered and discounted prior to the finalisation of scheme design. In simple terms, the applicant must balance the requirements of radio planners for an effective base station site with the specific site constraints from a town planning perspective. In this instance the site is surrounded by designated heritage assets, being within the Regent Canal Conservation Area and adjoining a listed building.

In this instance, a design was required that could provide height above the rooftop level of the application site that would minimise the impact of views of the equipment from along Camden Road and the surrounds and allow for an antenna layout that would prevent radio signal 'clipping' the edge of the subject building or surrounding structures. The following design solutions were considered and discounted:

Stub mast in the centre of the roof of the application site

A stub mast is a steel lattice construction that provides a head frame upon which antennas can be fixed. An example photograph of a stub mast atop a roof is provided below:

Stub masts are generally heavy structures due to the amount of steel required for their construction. Notwithstanding the doubtful capability of the application site to safely accommodate such a structure, it would appear as a prominent addition to the streetscene and the entire structure and associated antennas would very likely be visible from ground level due to the increase in height atop roof level. For these reasons a more discreet form of development was required that the applicant was confident could safely be accommodated at the building.

Antennas fixed to the side of the building

Radio planners have advised that panel antennas fixed to the side of the building would not provide the required height of antennas to provide effective radio coverage to the surrounding area and that other tall buildings within the immediate surrounds would block the effective propagation of radio signal. This option was discounted on this basis.

Antennas fixed atop the plant room

The applicant considered fixed pole mounted antennas to the top of the plant room situated in the south part of the roof. The plant room is slightly higher than the general rooftop level, being at 22.6m, compared with 20.2m. The applicant undertook an initial visual assessment of this option and determined that antennas would be too prominent within the streetscene because it would be possible to view the entire installation as a whole rather than only part of the installation as proposed. In other words, the antennas would be ‘clustered’ together, the visual impact of the equipment would be accentuated whereas the current development proposals allow for the equipment to be spread out at roof level thereby creating more of a sense of space and reducing the visual impact.

No guidance was received by the applicant from the Local Planning Authority in respect of site design prior to the formulisation of site design despite the submission of a valid pre-application enquiry. The applicant has based design upon visits to the site and surveys of the surrounding area as well as the principles of good planning practice and the general requirement that telecommunications equipment is sited as discreetly as practically possible.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration 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, Telephonica operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of Telefonica's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.	**Yes** ICNIRP declaration included under cover of this planning application	No

4. Technical Justification

A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

Mobile connectivity and service is required where customers live, work and play. 5G coverage and superfast mobile broadband data capacity demand will continue to increase exponentially with the introduction of IoT (Internet of Things), machine to machine connectivity, automated transport/industry and other 'smart' applications. To this end the existing shared infrastructure within the built environment has had to be reviewed and adapted as appropriate. This application is driven by the requirement of Cornerstone to improve network coverage and capacity in the immediate geographic area surrounding the proposal site that will result in a more reliable mobile digital connectivity infrastructure.

The proposed installation is a new site in an area that has increasingly poor levels of coverage across the Telefonica and Vodafone network as demand for network coverage has increased in the dense surrounding area . The level of coverage to this part of Camden has steadily been declining as the number of handsets

in the surrounds has been increasing without the deployment of new base stations to compensate, where additional handsets place additional demand on the mobile network.

Without the proposed installation the coverage within this part of Camden will remain poor. In practical terms, this means that users would find it difficult to secure a consistent and reliable connection for data meaning mobile phone usage is slow and the handsets cannot be utilised for the purpose which they were designed. The existing poor coverage is compounded when users try and access the network whilst indoors given mobile signal finds it difficult to penetrate stone walls.

84 Camden Road was selected as a good location for a new telecommunications site as it has several characteristics that are lacking from other buildings in the immediate surrounds. These being:

- The building is significantly taller than most buildings along Camden Road. This is important for two main reasons where firstly it allows antennas to be positioned above the height of surrounding substantial trees and other street clutter that would obstruct radio wave propagation and secondly that the height of the building allows the antennas to provide effective coverage over a larger area.

- The building offers the change to site antennas to allow for radio propagation in 360 degree direction around the site thereby maximising the public benefit that will be accrued from the proposals.

- The building is available to host the telecommunications equipment at roof level.

- The building is not listed meaning that the impact on designated heritage assets within Regent Canal Conservation Area is diminished.

The below coverage plots show the existing and proposed scenarios relating to radio coverage in the surrounding area nd have been produced by Vodafone radio planning engineers.

Existing Coverage

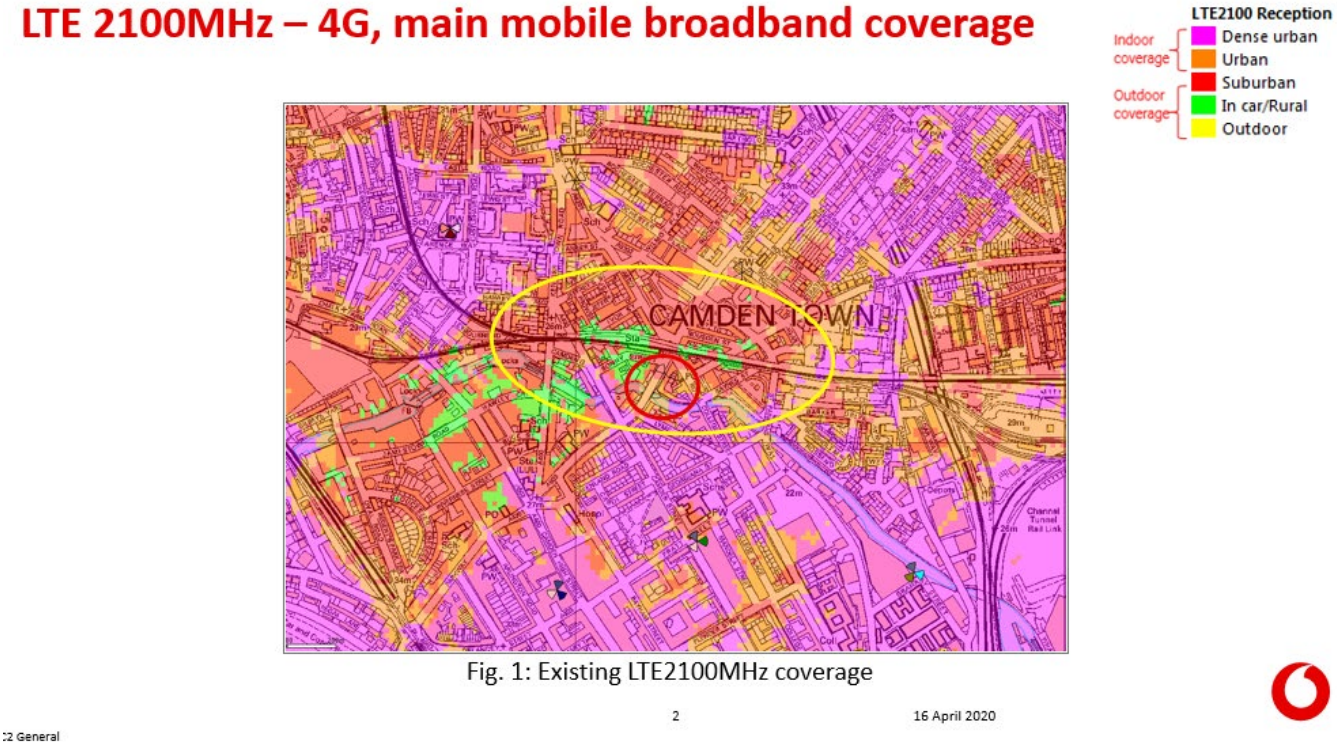

Fig. 1: Existing LTE2100MHz coverage

Proposed Coverage

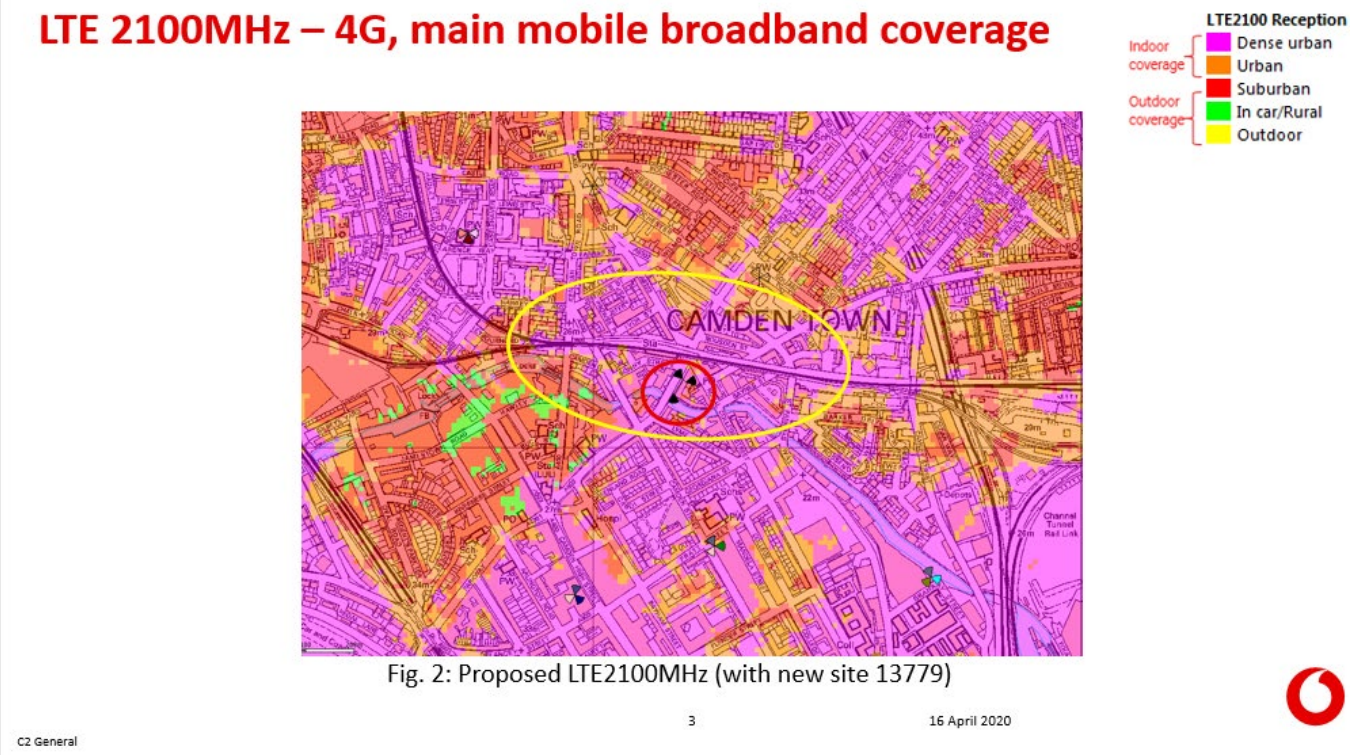

Fig. 2: Proposed LTE2100MHz (with new site 13779)

The plots show various levels of coverage ranging from 'outdoor' (the poorest level above nil coverage) and 'dense urban' (the highest level). Users benefiting from dense urban coverage could expect the highest data transfer rates whilst inside a building with no drop off in service. Outdoor levels of coverage mean that the network could only be accessed sporadically whilst outside and handsets could not effectively perform the functions for which they are designed.

The plots show the poor levels of existing coverage across much the area to the north of the application site, particularly around Camden Town Overground station. 'In Car' coverage means there is some access to the network but that it would be extremely difficult to effectively use the network whilst indoors. The poor areas of coverage encompass a multitude of land uses within the Town Centre including residential, education, office, industrial and medical facilities meaning that the impact of the poor network is experienced by a diverse number of people.

The proposed plots show a demonstrable benefit of the proposed development where large parts of the surrounding area will benefit from the highest levels of service coverage. This is a significant benefit of the scheme that should weigh heavily in favour of granting planning permission.

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

As explained above, It is acknowledged by the applicant that new telecommunications facilities can be installed in a variety of places, using a variety of construction techniques. The parameters of the project mean that the 'cell search' area, the area where a telecoms installation could technically serve the surrounds is limited.

Cell Search Area

The optimal cell search area has been provided by Telefonica radio planners and is the area within which a new site could effectively provide a significant uplift in coverage to the area surrounding Camden Town Overground Station. It can be seen from the coverage plots provided where the gap in coverage is located. Ideally, radio planners would like a site situated within the exact centre of the area deficient in coverage as this would provide maximum efficiency across the network. However, in practice this is rarely possible and an alternative solution must be found that best serves the area whilst being acceptable in town planning terms.

Alternative Sites

In order to show how each of these alternative possibilities have been considered and discounted, the following categories are used:

- Possibility of mast sharing and upgrade of existing masts;
- Use of existing buildings or other structures; and
- Other new installations (including installations with planning permission).

Site Search Methodology

Following the identification of a cell area, Telefonica planners and NET acquisition surveyors undertook a desktop analysis to identify the best way of meeting the coverage requirement.

The desktop search identifies other operators' existing telecommunications installations. This interrogation of databases ensures any mast-sharing opportunities are identified and maximised where possible. Where available, Local Planning Authority mast registers are also reviewed. The London Borough of Camden does not hold an up to date register.

The radio planner defines a cell search area as described above, which is then issued to an acquisition agent who undertakes a detailed ground search with the radio planner to identify suitable options. This could be existing buildings or masts, as well as, new greenfield structures. In this case, the target area encompasses the immediate area to the east of Camden Town Overground Station.

A site survey is conducted to provide a full structural analysis of the site including confirming power routes and how the site will be linked into the network. A site visit is then undertaken by a qualified town planning agent to assess whether the site will be acceptable in planning terms. Terms with the landlord are then finalised, detailed plans prepared, and the application progressed to submission.

The above methodology outlines the long-term procurement process involved in progressing new telecommunications sites. A number of important key factors must align before any site is progressed making the prospects of finding sites difficult and often long-term.

The following table provides an explanation of the lengths the applicant has explored with regard to site selection and alternative sites. The scope of the applicant's assessment has considered the surrounding designations as well as existing masts and other buildings in the surrounds. The below table provides detail of the consideration of alternative sites.

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
Rooftop	British Transport Police HQ. 25 Camden Road, London, NW1 9LN	E: 529105 N: 184067	This building is not available as the access require to the roof area both during the construction and operational phase would present unacceptable security risks.
Rooftop	37 Camden Road, London, NW1 9LR	E: 529145 N: 184135	The roof of this building is entirely covered with solar panels. There is no space available to accommodate the required telecommunications equipment and the site has been discounted on this basis.
Rooftop	Rixos Apartments, 47 Kentish Town Road, Camden, London, NW1 9PF	E: 529085 N: 184134	This site is too far to the west of the target area to provide the required level of coverage and has been discounted on this basis.
Rooftop	140-146 Camden Street, Camden Town, NW1 9PF	E: 529085 N: 184134	North part unsuitable roof and southern part too low and coverage to Camden Road blocked by buildings to east. The site cannot therefore provide the necessary radio coverage and has been discounted on this basis.
Rooftop	Lawford Whart, Lyme St, London, NW1 0SF	E: 529426 N: 184060	The applicant's asset surveyors have assessed the roof as being physically unsuitable for the installation of equipment and for the most part too low to provide the height required.
Rooftop	Camden Road Station, London, NW1 9LS	E: 529144 N: 184205	The building is listed and the applicant has assessed that unacceptable harm to the fabric of the building would result from the proposals and that therefore they are unacceptable.

Material Considerations

Camden Local Plan (2017)

A key consideration for the Local Plan is how the planning system can harness the benefits of growth throughout Camden. Paragraph 2.6 sets down key priorities for delivering growth and harnessing its benefits including securing the infrastructure and services to meet the needs of the borough's growing number of residents, workers and visitors. This includes digital infrastructure requirements.

Further support for digital connectivity is set down at paragraph 2.52 which states Camden will support Central London as a focus for Camden's future growth in utilities and digital infrastructure.

At paragraph 5.10 the Council set down their acknowledgement of the importance of digital infrastructure in enterprise development and an expectation that electronic communications networks, including telecommunications and high-speed broadband will be provided for business.

Policy D1 is a design related policy that states the Council will seek to secure high quality design in development throughout the borough. The Council will require that development (amongst other things):

- Respects local context and character and
- Preserves and enhances the historic environment and heritage assets in accordance with Policy D2 (heritage).

Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation area. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm. The Council will require that development within conservation areas preserves or, where possible, enhances the character of appearance of the area.

National Planning Policy Framework (February 2019)

The governments National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 112 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of *reliable* communications infrastructure for both economic growth *and social well-being*.

The NPPF continues to support the expansion of electronic communications networks at paragraph 112. It notes that policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF makes reference to 5G:

'*Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (<u>such as 5G</u>)…'* (applicant underlining).

With the above in mind, the Government is already forward thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

Paragraph 113 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 116 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining 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.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or 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 the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of

granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 38 it 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…*permission in principle*, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'*.

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 80 states:

> *'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation[40]'…*

Footnote 40 of the NPPF states:

'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'.

Section 16 relates to conserving and enhancing the historic environment. Paragraph 193 states that when considering the impact of a proposed development on the significant of a designated heritage asset, great weight should be given the asset's conservation. Paragraph 196 continues that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. These paragraphs are relevant to this proposal since the application site is situated within the general vicinity of a designated heritage asset.

<u>London Plan (2016)</u>

Policy 4.11 of the current London Plan addresses Developing London's Economy and Encouraging a Connected Economy. Policy states that all strategic agencies should facilitate the provision and delivery of the information and communications technology infrastructure a modern and developing economy needs, particularly to ensure adequate and suitable network connectivity across London.

<u>London Plan (July 2019 draft)</u>

The draft version of the emerging London Plan clearly draws the link between economic growth and communications capacity stating that such infrastructure supports the day-to-day lives of Londoners. Access to world-class digital connectivity to improve the lives of Londoners and enable businesses to thrive is a stated Mayoral aim as set down in the plan's foreword. The draft plan has been through a round of examination in public and so should be afforded some weight in the decision making process.

<u>Proposed Reforms to Permitted Development Rights to Support the Deployment of 5G and Extend Mobile Coverage (August 2019)</u>

Although the application does not benefit from current permitted development rights, the applicant is mindful of the recent government support for the development of digital connectivity set down within recent consultation on changes to permitted development rights.

Important text states that the Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. The Government is committed to extending mobile geographic coverage further across the UK, with continuous mobile connectivity provided to all major roads.

As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver prosperity at the local level and enable all places to share in the proceeds of growth.

The Government is determined to ensure the UK receives the coverage and connectivity it needs. The Future Telecoms Infrastructure Review, published in July 2018, sets out the Government's long-term strategy for meeting its digital connectivity targets. It restated the Government's commitment to tackling barriers to deployment and concluded that there were steps the Government could take in order to create the right conditions for the investment required to deliver additional network coverage and capacity.

The Government wants to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from the investments in this new technology. All of the four main mobile network operators have announced intentions to begin deployment of 5G networks in 2019 and the current application is a manifestation of this commitment.

The case for 5G is compelling as it will bring faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, it has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time – creating the so-called "Internet of Things". This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business and farmers, all through the real-time management of data.

<u>Telecommunications Code of Best Practice on Mobile Network Development in England (24 November 2016)</u>

The Telecommunications Code of Best Practice has been fully revised in November 2016 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information super highway no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2013).

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development.

Section 2 of the Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that the continued expansion and development of mobile networks is a key element of the National Infrastructure Delivery Plan 2016 – 2021. This recognises that digital communications are now a crucial component of everyday life, with improvements in connectivity being key to a vibrant economy (para 2.1).

Paragraph 2.2 goes on to state that consumers, businesses and public bodies increasingly rely on mobile communications and expect to receive a signal wherever they are. The Code indicates that recent changes in planning policy [and regulation] are intended to align with Government

communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed. Section 2 of this Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth.

Section 3 of this Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that there remains a reliance on radio masts to provide the main umbrella of coverage. Paragraph 3.1 explains that radio signals operate like light and must "see" over the target coverage area, they cannot be hidden and so there will always be a degree of visual impact.

Paragraph 3.2 clearly indicates that in assessing the visual impact, greater emphasis than previously should now be placed on the radio planning requirements to achieve mobile coverage (as shown in the recent changes to permitted development rights, at the end of November 2016, and the reduced test in the most recent NPPF.

Paragraph 3.3 goes on to highlight that the operator systems tend to be demand-led or to fulfil coverage obligations. With the ever increasing demand for data hungry applications available to a range of connected devices, such as smart phones and tablets, the requirement to upgrade and improve networks through changes to existing sites and the development of new sites is constant. As most parts of the country move on to a superfast highway, so the need to bring coverage to 'not spots' and improve coverage in 'partial not spots' intensifies.

Paragraph 3.4 of The Code provides advice to local Planning authorities who are concerned about proposals, stating that they should not 'look for problems' but should work proactively with the Mobile Network Operators to find solutions, in line with paragraph 187 of the NPPF.

Paragraph 4.1 of the Code acknowledges that customer expectations have evolved with technology. The expectation is that they will always be connected and able to access services in exactly the same way as fixed broadband for personal, educational and business purposes.

Paragraph 4.2 acknowledges that data, i.e. using the internet, puts increased demand on capacity and therefore the need for additional base stations to keep abreast of customer demand. However, changes in working practices for the operators, in line with national guidance, streamlining networks, sharing base stations has reduced the overall amount of infrastructure required.

The Code goes on to acknowledge that operators maximise the use of their existing network infrastructure for the provision of 4G services and are similarly upgrading their 3G network infrastructure to improve capacity and coverage. However, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity needs to be enhanced in line with Government commitments and customer demand.

Similarly, some new sites will be required to replace existing sites that are lost, for example, through redevelopment of an existing building. Some masts may need to be redeveloped or replaced to enable an upgrade in services to take place.

Section 5 relates to mobile connectivity in the 21st Century, explaining that mobile phones and other devices are now everywhere. Mobile connectivity is not just making calls and texts but also mobile broadband. The majority of mobile phones in the UK are Internet-enabled smartphones and large numbers of people also now own tablet devices. People are increasingly choosing to access the internet using a mobile device even when they have fixed broadband connection available.

The Code acknowledges that by the second decade of the 21st Century, the greatest increase in traffic across mobile networks was in data i.e. internet use (para 5.3). Paragraph 5.4 states that in terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5% in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade.

Section 5 of the Code goes on to highlight that connectivity promotes social inclusion. In recent years, more people rely on a mobile phone than they rely on a landline. Furthermore, people on lower incomes are even more likely to live in a mobile only household, or to access the Internet using a mobile connection (para 5.5).

The Code illustrates that mobile connectivity helps in the delivery of public services e.g. to access Central and Local Government via online services, acknowledging that lives are more likely to be saved when a 999 call is made from a mobile than from a landline, Telehealth is becoming increasingly important and text message reminders also improve compliance with medication and keeping NHS appointments.

Good mobile connectivity also promotes sustainability e.g. it reduces the need to travel and thus carbon emissions (para 5.7). The Code continues to support mobile telecommunications network as it is seen as a crucial piece of national infrastructure in economic, community and social terms (para 5.8).

Paragraph 5.9 states that there is a need to continually upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely. This is driven by increasing consumer demand for data, improved connectivity and more capacity, together with Government aspirations for improving connectivity and coverage.

The Code provides guidance on siting and appearance principles at Appendix A. It sets out a number of design principles in respect of telecommunications development. However, the code acknowledges that the options for design used by an operator will be affected by site conditions including requirement to link the site to the network, landscape features and coverage and capacity requirements. The main options for the operator include:

- Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator);
- Installation on existing buildings and structures;
- Erecting new ground based masts;
- Camouflaging or disguising equipment where appropriate; and
- Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage).

The Code in Appendix A acknowledges that it has been a long standing Government policy objective to support the sharing of masts and sites. Operators also aim to site share wherever viable.

Concerning the erection of new ground based masts; The Code at Appendix A page 27 provides examples of where the environmental and visual impact of the mast can be greatly reduced.

• Placing the mast near similar structures. For example, industrial and commercial premises, road signs and lamp posts;
• Placing a mast within or adjacent to an existing group of trees. This option is more successfully implemented in or near wooded areas. It should also be noted that the top of the mast placed in trees will need to be above the tree-line in order for the equipment to work for the allowance of future tree growth;
• Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts, and

• Appropriate colouring. Masts seen against the sky are best left in their galvanised state or painted pale grey. Against a wooded backdrop, a matt green or brown colour scheme would be more applicable.

The Code continues to support sympathetic design and camouflaging including concealing antennas in familiar features such as flagpoles, street lamp posts, telegraph pole style designs and signs.

6. Assessment of Visual Impact

The installation has been arranged to provide the requisite signal coverage requirements in the most discreet form possible. Every effort has been made by the design team to site the antennas to reduce the visual impact of the proposal whilst maintaining the effectiveness of the antennas themselves. Although the proposed antenna are not themselves set back from the edge of the roof, it would not be possible to position the antennas back from the edge of the roof as this would result in signal 'clipping' where the building itself begins to block the propagation of radio signal and result in an inefficient site. The cabinets, grillage and other associated equipment will be hidden from view within the wider surrounds because they are situated centrally within the roof, being set back several meters from the parapet edges. On this basis, the visual impact of the proposal relates solely to the antennas themselves and supporting steel structures which will never be viewed as a single combined installed because of the distribution of equipment across the wider roof space.

The visual impact of the proposed development will primarily be along Camden Road and for buildings opposite the application site which have windows orientated toward the application site.

<u>Camden Road</u>

Camden Road is a busy arterial route through the borough location and is designated as such in the Camden Local Plan. Accordingly, there are a variety of land uses at ground floor level and above together with numerous items of street furniture and street decoration such as telephone boxes, lamp posts, bus stops, benches and mature trees. These elements combine to characterise the area as a dense urban part of the borough as distinct from surrounding residential roads. This is a busy urban environment where the already high degree of street furniture situated within the town centre means the location is more capable of assimilating changes through the addition of equipment which may go relatively unnoticed in the wider context of a busy streetscene.

Long distance views along Camden Road are generally possible looking both north and south but are restricted by virtue of this street furniture, particularly in the summer months when the many substantial mature trees within the town centre will be in leaf and also should be viewed in the context of an existing 'cluttered' urban environment. Due to these factors the visibility and prominence of the rooftop level of the application site from Camden Road is diminished and clear views possible from only a limited number of locations within close vicinity of the site. The applicant accepts that the equipment will not be invisible but has designed the equipment to sit as low to the top of the roof as possible to minimise impact whilst being capable of delivering the uplift in coverage required. To this end, the antennas themselves are only 3m above the roof level which is quite modest by industry standards.

<u>Buildings in the surrounds</u>

There are a limited number of buildings which have windows orientated toward the application site. These include the upper floors of 35 Camden Road that is directly opposite the proposal site. This building is lower than the subject site and the upper floors appear not to be in residential use. Windows are therefore at a lower level and the proposed equipment is not at eyeline of any of these properties. The visibility of the equipment will therefore be restricted and have a limited, acceptable impact.

7. Heritage Impact

8.

The Impact on designated heritage assets has been considered in terms of the impact upon the setting of the wider Regent Canal Conservation Area.

The equipment installed will be at a relatively low level atop a substantial building and for the most part will have an impact on the Conservation Area that is limited to the area immediately surrounding the application site. Any views of the equipment will be limited within the wider surrounds and therefore the impact on the wider Conservation Area as a whole will also be limited.

Given the equipment is spread out across the roof level it is extremely unlikely that all of the equipment could be viewed simultaneously meaning only a small proportion of the equipment would be viewed at any given time thereby reducing the impact of the proposed equipment. Moreover, the equipment proposed is not a solid mass, there are gaps between the support poles, antennas and dishes meaning that views will be possible through the equipment which will help the equipment to assimilate with the sky that will form the backdrop.

The applicant's position is that any perceived harm caused by the proposed development must be considered to be 'less than substantial'. Accordingly, NPPF paragraph 196 is engaged that requires the harm caused to be balanced against the public benefits of the proposed development. The applicant's position is that the application proposes a discreet form of telecommunications development on the most obvious and technically preferable site for telecommunications development along this part of the Camden Town Centre. Any perceived harm is readily outweighed by the public benefits set down within this supporting information document and the presentation of public benefits provided in the supporting CTIL documentation.

9. Public Benefits

Central to the proposed development is the provision of the planned expansion of the communication network resulting in reliable mobile digital connectivity. There is a clear impetus at local, regional and national level for the continued expansion of the communications network to realise the numerous associated benefits. Reflecting on the wider benefits of the proposal these can be broken down into each of the aspects of sustainable development as set in the NPPF:

Economic Benefits – modern communications in all of their different and emerging forms, including mobile communications, help maintain high and stable levels of economic growth and employment. The contribution to the national economy is also significant where all businesses, from large to small, benefit from modern communications. This proposal will improve the ability of local businesses to operate and compete effectively through access to modern communications thereby helping to maintain and increase local employment opportunities.

Social Benefits - modern communications, including mobile communications, aid social progress, which recognises the needs of everyone. Connecting to the Internet via a mobile device allows people to access a wide range of central and local government services. Mobile devices enable flexible forms of working that provide opportunities to working parents or carers and help them achieve a better work life balance with both family and community benefits. By providing means of communication that improve convenience and enhance personal safety and security. This is especially important to vulnerable groups who may otherwise feel unable to participate in certain activities.

Environmental Benefits - modern communications, including mobile communications, provide effective protection of the environment by helping reduce the need to travel by enabling modern working practices such as greater home working. Such practices alleviate the pressure for new commercial development such as offices, through more efficient and flexible use of existing accommodation. For the same reasons, modern communications, including mobile communications, help ensure the prudent use of natural resources.

Confirmation that submitted drawings have been checked for accuracy

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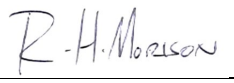
Signed:		Date:	16/04/2020
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