SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Greater London House	Site Address:	Greater London House, Hampstead Road, Camden, London, NW1 7QY
National Grid Reference:	529127, 183291		
Site Ref Number:	98528	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: Planning database consulted in lieu of mast register.		
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 advice was sought on the 6 April 2020. No comments have been received. It was however decided to proceed with an application as it is considered that the best design has been put forward in order to achieve the technical requirements of the site, and due to the technical constraints that affect the design there is a limited scope to alter the appearance of the site to a significant degree.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	**Green**
Outline of consultation carried out: Pre-application consultation letters were sent by email on the 6 April 2020 to Regent's Park Ward Councillors (Councillors Ali, Johnson and Shah).			
Summary of outcome/main issues raised (include copies of relevant correspondence): There have been no responses to date.			

[1] Macro or Micro

School/College

Location of site in relation to school/college (include name of school/college): A search of publicly available Department for Education and Ofsted records identified that there are no schools or other education centres in close proximity to the existing telecommunications base station.
Outline of consultation carried out with school/college (include evidence of consultation): There are no schools or education centres in close proximity of the existing telecommunications base station, therefore, no consultation was required.
Summary of outcome/main issues raised (include copies of main correspondence): N/A

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response: N/A - Consultation is not required as this is a full planning application.		

Developer's Notice

Copy of Developer's Notice enclosed?		Yes	No
Date served:	N/A – This application seeks planning consent and not prior approval. The relevant notice has been issued as per the information on certificate B.		

3. Proposed Development

The proposed site:

The application site is an established telecommunications base station located on the roof of a building used for commercial purposes as offices. The host building is within Camden Town which is within the centre of London north of the River Thames. The surrounding area is mixed use in nature and is typical of an inner-city urban environment. Euston Station is located to the south with the Mornington Crescent tube station immediately to the east. The host building is surrounded by a number of listed buildings and sits within the Camden Town Conservation Area, with Regents Park Conservation Area located to the west.

The host building itself is a large commercial building which consists of a variety of roof heights, which are mainly flat in nature and accommodate a large amount of plant machinery consisting of air conditioning units, flues etc. The lower roof height is 23.95 metres with the upper roof height measuring 30.2 metres and the height of the plant room measuring 34 metres. The existing equipment comprises of 4no. antennas located on the upper roof on the northern end of the building, along with 2no. 300mm dishes. There are 2no. antennas located on the north western side of the upper roof with the equipment cabinets located within an internal room. The rooftop also accommodates other licensed operators' telecommunications equipment.

An aerial view of Greater London House

Greater London House

Photograph of the northern end of Greater London House

The proposed upgrade would involve the removal and replacement of the existing antennas with 6no. antenna apertures. Two of the antenna apertures would be located on a freestanding frame on the north eastern side of the lower roof, two antennas apertures would be located on a freestanding frame on the plant room roof which is on the north western side with two of the antennas apertures on existing support poles on the northern end of the upper roof level. The installation of 2no. 600mm dishes on the northern end of the upper roof with the existing 2no. 300mm dishes remain in situ, along with installation of associated ancillary development.

This development would provide improved connectivity and network enhancement to the surrounding area for both EE and H3G, including new 5G coverage

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

Network information can be provided on request.

Type of Structure *(e.g. tower, mast, etc):*	
Description: Proposed Removal: 6no. antennas Proposed Installation: 6no. antenna apertures (4no. mounted on new freestanding frames and 2no. on existing support poles) 2no. 600mm dishes	
Overall Height:	37.3 metres
Height of existing building *(where applicable):*	23.95 metres lower roof level / 30.2 metres upper roof level / 34 metres plantroom roof
Equipment Housing:	N/A
Length:	N/A
Width:	N/A
Height:	N/A
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Galvanised Steel
Equipment housing – type of material and external colour:	N/A

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

Background

In designing the proposed upgrade, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as is practicable. It, however, must be acknowledged that technical constraints have influenced the design and limited the scope to alter the appearance of the site to a significant degree.

When designing a radio base station, it is necessary to incorporate certain vital elements and to work around several technical constraints. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signal(s), the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves,

which emit the radio signals (along with any necessary amplifier or receiver units) and communicate with mobile phones and wireless devises.

Other elements necessary for the base station to function are the power source (a meter cabinet or a generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas, link dishes and, depending on the nature of the site various supports, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

Site design

As noted above, the applicant gives due regard in designing all site upgrades to limit the visual impact through good design. In this instance the upgrade is subject to technical and build constraints. That notwithstanding, it is submitted that the appropriate siting and design put forth mitigate any potential impact on the site and its surroundings to an acceptable level.

The accompanying document, titled *‘5G and Future Technology’*, provides more detailed information on 5G rooftop installations and the need for antennas to sit above the existing rooftops to ensure there is no ‘clipping’. The existing telecommunications site at Greater London House has become an accepted part of the built environment over time. It is anticipated that the proposed upgrade would not represent an incongruous change within the existing landscape and conservation area as the proposed design would be very similar to the one currently adopted.

To achieve the required network improvement, the number of antennas that transmit signals are required to be replaced with 6no. new antenna apertures. An existing building is proposed to be utilised, and the building already accommodates a significant amount of communications equipment. The bulk and scale of the existing building and equipment ensures the impact of the development would be kept to an acceptable level. The existing antennas no longer fulfil the technical requirements needed to support all the technologies for both EE and H3G. New freestanding frames will be required to support 4no. of the antenna apertures required to enhance the network services in the area, for both EE and H3G, with 2no. utilising existing support poles. This will ensure that Camden Town and the surrounding area will be at the forefront of the next advance in technology being deployed. Furthermore, the height of the antenna apertures is the lowest which would provide the required level of coverage and also to ensure it complies with ICNIRP guidelines

Dishes provide a link between base stations within the network. The size and height of the dishes is determined by the location of these surrounding neighbour cells. In this instance, only 2no. additional 600mm dishes would be required, along with the retention of the 2no. existing 300mm dishes. The size and number of dishes has been kept to the minimum required for operational efficiency and the associated impact of this addition on the surroundings would be minimal.

Radio signals are generated within radio equipment housing cabinets. New equipment housing is required at the application site to generate the signals required. In this case, the proposed equipment cabinets would be located within the internal equipment room.

There is very limited scope to alter the design in order to meet the technical requirements of the site, nonetheless it is considered the proposal now put forward is appropriate to the site and its surrounds and avoids any unacceptable level of impact.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)	**Yes**	No

International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.

When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.

In order to minimise interference within its own network and with other radio networks, EE Ltd and H3G UK Ltd operates their network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.

As part of EE and H3G's network, the radio base station that is the subject of this application will be configured to operate in this way.

All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.

The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

4. Technical Justification

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

The development is required to provide improved connectivity and network enhancement to EE and H3G in the area. As noted above, apart from providing 4G coverage, 5G coverage will be deployed from the site without the need for further changes to the site, ensuring that Camden Town and the surrounding area benefits from the latest technology.

As stated in Paragraph 112 of the NPPF (2019) "*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 EE and H3G to provide improved network services to the surrounding area, will assist in achieving these objectives.

In its 2011 Communications Market report, Ofcom summarised one of the 'key market developments as follows: "*The explosion in mobile data volumes. The increasing use of mobile broadband services via dongles and smartphones resulted in a 67% increase in data transferred over the UK's mobile networks in 2010*…"

The increase in smart phone usage clearly demonstrated in the Ofcom Communications Market Report of August 2015, which makes the following key points in relation to mobile phones and 4G usage:

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

To meet this demand and improve the quality of service, additional base stations may be needed. In this case the replacement of the existing base station is required to continue meeting the technical requirements.

Furthermore, mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

One of numerous benefits of this, on a wider scale, is that this allows for an increase in home working, by providing the opportunity to create a “virtual office”, reducing the need to travel for work as a consequence, which is helpful in supporting the sustainable development agenda.

It is therefore very important for ‘mobile only’ households that live and work and any businesses that operate in this part of the LPA’s area, together with visitors and others who are staying in or travelling through the area, that the necessary indoor RF coverage is provided to enable them to have satisfactory mobile telephone and internet access, and thereby help achieve the Government’s objectives for inclusive development and the rollout of modern high-speed communications networks.

It is for these reasons that the National Planning Policy Framework places such emphasis on encouraging the continued rollout of high-speed digital infrastructure networks, of which the proposed upgraded development will form a key part. This position was reinforced by a statement made by the former Prime Minister David Cameron in March 2016 when he specifically addressed the vital importance of mobile connectivity for residents and local economies and highlighted that the urgent delivery of the required network improvements is a Government priority;

“*Ten years ago, we were all rather guilty of leading campaigns against masts and all the rest of it. Our constituents now want internet and mobile phone coverage. We need to make sure that we change the law in all the ways necessary, that the wayleaves are granted, that the masts are built, that we increase coverage and that everyone is connected to the information superhighway. This is substantiated in the most recent budget announcement of 16th March 2016, which commits to provisions for “greater freedoms and flexibilities for the deployment of mobile infrastructure*”.

5. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

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

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

Paragraph 113 of the National Planning Policy Framework, in which the Government's supportive stance towards developing high quality communications infrastructure is laid out, 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".

The proposal is for works at an established telecommunications site and not for the development of a new site, thus the consideration of alternative sites is not appropriate. The applicant has examined its portfolio of sites in this region and determined that there are no alternatives in the area which can be upgraded to meet the specific technical requirement. The application site represents the only feasible option in this instance which allows the requirement to be met without the deployment of an additional base station in the locality.

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

Environmental Information:

The application site is not located in an area considered to be environmentally sensitive, or within an identified protected habitat or protected species area. The proposal will subsequently not have any potential negative impacts on any sensitive habitats or species.

As far as practicable the proposed development has been designed to keep to a minimum the impact on amenity and on heritage assets in the area. The use of an existing communications site and the design of the development ensures there would be only a limited impact which would not be sufficient to harm visual or residential amenity, or heritage assets.

Siting and Appearance

The Code of Best Practice on Mobile Network Development in England emphasises that "*Existing masts, buildings or other structures should be used unless the need for a new site has been justified*", encouraging the use of existing base stations to improve connectivity where possible, such as in this case. In this case, the technical requirement can be met through the upgrade of an existing site, as opposed to the deployment of a new site in the area in addition to this existing site. Therefore, the proposal is in line with this guidance by upgrading this already well-established telecommunications base station, where the siting of which has already been deemed appropriate, as opposed to installing a new site in the area that will increase the number of base stations in the area. It is therefore considered that the siting of the proposal is wholly appropriate.

As noted within section 3 of this statement, the existing site is set within the Camden Town Conservation Area and is surrounded by a number of listed buildings. The host building itself is noted as "positive" and "focal" within the conservation area appraisal and is located within Commercial Sub Area 1, which is characterised as being a busy commercial and retail area. The focus of Camden Town is the Britannia Junction located at the northern end of the commercial area and is a busy

interchange which is distinctly urban in nature. The host building is not visible at all from Britannia Junction.

Mornington Terrace is located on the western side of the conservation area and is noted within the appraisal as being of particular historical importance. The road consists of a number of listed buildings, as does Mornington Crescent, which is located directly to the west of the host building. The existing antennas on the western side of the host building are currently viewed from both of these locations and the proposed replacement antennas would be of a similar design and in similar locations as the existing antennas and existing support poles have been utilised where possible. This means that the upgraded equipment would not represent an incongruous change within the existing landscape thus preserving the character of these historically important heritage assets on the western side of the conservation area.

There would be a set of additional antenna apertures located on the lower roof of the north eastern side of the building. When viewed from the eastern side of the conservation area, particularly the Grade II Listed Camden Palace Theatre and Grade II Listed Morning Crescent Tube Station, the upper section of the roof and the telecoms equipment existing on the upper section would provide a backdrop softening the impact of the additional antennas, furthermore they would not protrude above the existing roof line therefore preserving the skyline and character of these heritage assets as well as the conservation area.

It is considered that the proposal utilises the most suitable design available to meet the technical requirement within the very specific technical constraints. As discussed in section 3, replacement antenna apertures that emit signals are required at this site as the current antennas do not support all the required technologies, 4G and 5G for both H3G and EE. This accounts for the increase in scale of equipment required. Not all of the current supports are capable of supporting these additional antennas, however, existing support poles have been utilised where possible.

The proposed equipment cabinets would be located out of view within the internal equipment room.

In terms of heritage assets, the NPPF notes the following in paragraph 192 and 193:

"*In determining planning applications, local planning authorities should take account of:*

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness*."

"*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be.)"*

The applicants recognise the importance of retaining the key features and special historical characteristics of the adjacent conservation area. Due care has been made in avoiding the loss of or harm to these features and it is submitted that the proposal respects the context of the site and avoids any material or unacceptable harm. Given that the proposal will maintain the character and appearance of Camden Town Conservation Area and will not compromise the contribution this conservation area makes to London at large, nor the local distinctiveness, it is considered to comply with the requirements of the NPPF.

It should also be noted that paragraph 196 of NPPF states that "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use*".

As above, it is considered that the proposed will not bring about substantial harm to the character of the conservation area but will bring benefit to the public through improved connectivity and communications services.

While the applicants do not suggest that the proposed will have no impact, it is considered that when applying the balancing method advocated in the NPPF, the proposal finds itself in favour. It is important to keep the impact of telecommunications development in the area to a minimum and it is considered that the proposal achieves this. The benefits of the proposal however also need to be considered. In this case the public benefit from improved connectivity and wireless communication services. The applicant does not suggest that the proposal will have no impact on the area, but that this impact, that has been mitigated through the best design available within the technical constraints of the site, will be greatly outweighed by the public benefits the proposal will provide.

In this case, it is suggested that the application of the balancing method advocated in the NPPF, for the provision of communications and connectivity services, in the public interest, be utilised to balance the need for connectivity with the potential impact of the site. It is considered that when this balance test is applied to the proposal, where the need and significant public benefit is balanced against the appearance and level of associated visual impact of the proposed upgrade of an existing site, that the application proposal is positively in favour and is considered wholly appropriate.

This has been emphasised by the Planning Inspectorate on a number of appeal cases where, the planning inspectorate has ruled in favour of proposed developments of a similar nature, where this balance was applied. Some recent examples of where this balance was applied by the Planning Inspectorate include appeal cases referenced APP/Q3305/W/18/3206555 and APP/L1765/W/18/3197522. Extracts from these appeal decisions are included below for your convenience:

"*In considering the need for the proposal, Government policy, as set out in the Framework states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. In this respect, I have found that there is a need for the proposal which therefore weighs strongly in its favour. As I have found that the level of harm relating to this second main issue would be low, that identified need would outweigh the harm in this case*."

"*I conclude on this issue that despite the less than substantial harm that would be caused, the public benefits of the proposal would outweigh that harm."*

"*9. The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "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… The Council has commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision*."

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

While each application needs to be assessed on its own merits, the above appeals (along with a growing number of others) indicate a growing trend, based on national policy and guidance, to favour important utilities infrastructure developments and upgrades in the wider public interest when the potential harm is outweighed by the important and unavoidable public benefits they provide.

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

Planning Policy Context:

National Planning Policy Guidance
National Planning Policy Framework (2019) (NPPF)

The new National Planning Policy Framework, which came into force in February 2019, replaces the second National Planning Policy Framework published in July 2018. 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:

"*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 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-date7, 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 continued provision of reliable mobile communications services within the surrounding areas, 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.

Local Planning Policy

Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other

material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plans for the London Borough of Camden, relevant to the proposal, comprises:

- The London Plan: Spatial Development Plan for Greater London;
- Camden Local Plan (adopted July 2017);
- Camden Planning Guidance: Digital Infrastructure (March 2018).

The London Plan

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 EE and H3G to provide continued and significantly enhanced coverage to the surrounding area.

Camden Local Plan (adopted July 2017)

General policies of relevance include D1 (Design) which requires a high standard of development, and policy D2 (Heritage). This policy aims to preserve and enhance Camden's heritage assets, including conservation areas and listed buildings. Development within conservation areas is required to preserve or enhance the character or appearance of the area. As discussed within this document, the application site is situated within a designated area (the Camden Town Conservation Area), but it is it considered that there will be no significant impact on heritage assets and the proposed development is acceptable.

Given the very close proximity of the proposed equipment to the existing equipment (on the rooftop of Greater London House), and the impacts on heritage assets from the existing base station being considered acceptable, it is argued that a very similar design to that currently in situ should also be considered acceptable.

Camden Planning Guidance: Digital Infrastructure (March 2018)

The planning guidance sets out what is required for applications relating to telecommunications development and asserts that the Council will support the expansion of electronic communications networks including telecommunications. One of their aims to keep the number of sites to a minimum encouraging the use of existing sites. This proposal complies with this aim as it would entail the utilization of an existing telecommunications base station located on an existing building. The outline of pre-application consultation with various interested parties, ward members, stakeholders has been included within Section 2 of this document and has been carried out in line with the Code of Best Practice on Mobile Network Development in England. No responses objecting to the proposal were received. An ICNIRP certificate has been submitted to accompany this application confirming that the proposal is fully compliant with ICNIRP guidelines.

Conclusion

In summary, the application is in respect of electronic communications apparatus necessary to maintain and improve existing public infrastructure networks.

The specific requirement of the operators in this instance is to provide improved connectivity and network enhancement to the area, with a minimal impact. This site achieves this aim. The proposed development is compliant with the NPPF. The siting and design of the proposal is considered the most appropriate solution to providing the coverage requirements to the area and the application therefore merits support and there are no material considerations that indicate otherwise.

The proposal is fully compliant with ICNIRP guidelines.

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Signed:	Katy Jessop	Date:	20 April 2020
Position:	Town Planner	Company (Agent): (on behalf of EE Ltd & H3G Ltd)	Waldon Telecom (Agent) South Acre The Walnut Yard Gelscoe Lane Diseworth Derby DE74 2AN