Town Planning Statement

Proposed Upgrade of an Existing Electronic Communications Base Station at Maida Vale Telephone Exchange, Maida Vale, London W9 1QD

Site Reference 168856

Arqiva Limited and EE Limited

June 2020

1. INTRODUCTION

1.1 This statement is submitted in support of an application for a prior approval determination to upgrade an existing electronic communications base station at Maida Vale Telephone Exchange. This base station, which is managed by Arqiva, will provide improved mobile media connectivity to the local community by EE Limited through their network sharing joint venture called Mobile Broadband Network Limited (MBNL). Arqiva also manages most of the existing electronic communications apparatus installed on the roof of the building.

1.2 This statement includes:

- A description of the site and surrounding area
- A description of the proposed development
- An explanation of how the proposed siting and design of the development accords with National, Regional, and Local Planning policies
- A summary of the design and access considerations that have informed the proposed layout of the development.

1.3 Several other accompanying documents have been submitted in support of the application and these should be read in conjunction with this statement.

2. SITE AND SURROUNDING AREA

2.1 The application site comprises part of the roof of Maida Vale Telephone Exchange, which is located within a densely developed part of London on the eastern side of the A5 Maida Vale, a short distance to the south of Kilburn Town Centre. It is an unlisted building located approximately 30m to the south west of the St Johns Wood Conservation Area, which runs along the rear boundaries of properties fronting Greville Place and Greville Road

2.2 The telephone exchange is substantial building of brick construction located with an area of mixed commercial, residential, and other development. Adjoining the telephone exchange to the north is the Grade II Listed Islamic Community Centre with the Kilburn Gate Housing Estate and a Marriott Hotel beyond. To the east and south are residential properties at Vivian Court and Greville Place. To the west, on the opposite side of Maida Vale, are ground floor retail premises with flats above and a public house.

2.3 In addition to its primary use as a telephone exchange, the roof the building also hosts electronic communications base stations, comprising pole-mounted antennas, cabins, and transmission dishes operated by all four the UK's Mobile Network Operators, BT, and by Arqiva for our Smart Water Metering network for Thames Water.

3. THE PROPOSAL

The Proposed Electronic Communications Apparatus

3.1 The development proposed is shown in detail in the drawings submitted and is for an upgrade to EE's electronic communications base station that will provide improved fifth generation (5G) connectivity services to the local community in the Maida Vale, St. John's Wood, and Kilburn areas of London. The principal elements of this beneficial proposal are as follows:

- The removal of three antennas
- The installation of three replacement antennas on a combination of existing and amended pole-mounts
- Minor repositioning of two existing transmission dishes on an amended tripod pole
- A GPS unit fixed to an antenna support pole
- Three Remote Radio Units (RRUs), which have dimensions of 480 x 356 x 140mm (L x W x D), installed in conjunction with the antennas they support
- Ancillary apparatus, including replacement and additional BOB units

3.2 The apparatus proposed is not coloured green and blue, as drawn on the submitted drawings, but has been shown this way for illustrative purposes only to differentiate from the existing antennas and other apparatus installed on the building.

3.3 The respective finishes for the apparatus proposed are as follows:

- Antennas: these are made of aluminium and supplied in light grey, which is the same finish as the existing antennas to be removed as part of the planned upgrade of the base station

- Amended tripod: made from untreated aluminium and steel that will weather to a dull grey colour

- RRUs and BOB units: aluminium and plastic coloured light grey.

The Operator's Network Requirements

3.4 Section 6 of the Code of Best Practice on Mobile Network Development in England, published in June 2016, explains how mobile networks operate. In the annual network rollout information supplied in the past, EE will have explained their network requirements and the anticipated use of existing sites, including those owned by radio site management companies like Arqiva. Further information is provided in the accompanying document *the '**Supporting Operational and Technical Justification'*** statement.

3.5 Although the operator's networks are mature, improvements, upgrades and new sites are required for their networks for several reasons. For example, to increase capacity in an area of high demand, to provide new or improved network coverage in terms of quality as well as extent, or perhaps to provide coverage over a new development area such as a new housing estate or industrial park.

3.6 In this case, EE has identified a need to upgrade its base station to provide 5G services in a part of central London with considerable demand for mobile connectivity services from people living, working or visiting this area.

4. PRIOR ENGAGEMENT

4.1 The National Planning Policy Framework (NPPF) and the Code of Best Practice on Mobile Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the sensitivities of any given site. In this case, the proposal received a Green score when assessed against the traffic light rating model (see Appendix B of the Code of Best Practice).

4.2 As an acceptable from of development can be brought forward involving minor changes to an existing base station, we considered that formal pre-application engagement with the Council's Planning Department was unnecessary. If, however, you do have detailed comments to make on the proposals we should be pleased to discuss these with you at an early stage in the determination of this application.

4.3 In accordance with NPPF guidance and the Code of Best Practice on Mobile Phone Network Development, in June 2019 we wrote to the following educational establishments to inform them of the proposed development and to provide the opportunity for them to seek further information about it:

- Maida Vale Children's Centre, St Augustine's C of E Primary School, Kilburn Park Road, London, NW6 5XA
- The Naima Jewish Preparatory School, 21 Andover Place, London, NW6 5ED
- St. Augustine's Primary School, Kilburn Park Road, London NW6 5XA
- St Augustine's C of E High School, Oxford Road, London, NW6 5SN
- St. George's Catholic School, Lanark Road, London W9 1RB.

4.4 At the time of the submission of this application, we had not received a response to this pre-application engagement.

5. PLANNING POLICY

5.1 The relevant planning policy and best practice framework is found principally within:

- National Policy, especially the National Planning Policy Framework (NPPF)
- The regional and local policy framework set out in the adopted Development Plan, which comprises the London Plan, the Camden Local Plan 2017 and its accompanying Policies Map, and Supplementary Planning Documents such as the Mayor's London View Management Framework SPD
- The St John's Wood Conservation Area Appraisal and Management Strategy
- The Code of Best Practice on Mobile Network Development in England.

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development.

National, Regional, and Local Support for Modern Communications Infrastructure

(a) Section 10 of the NPPF

5.3 The proposal is supported by, and accords with, national policy in Section 10 of the NPPF, which provides further guidance on the Government's objective of providing high quality communications networks in England. The NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. The accompanying document ***'National Policy – Delivering Ultra Fast Broadband Mobile Connectivity'*** provides examples of the many, now well known, public benefits of mobile/wireless communications networks.

5.4 For these reasons, local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the associated special problems and technical needs of developing communications networks.

5.5 The development proposed also accords with the specific guidance contained in paragraphs 113 and 115 of the NPPF, and the Code of Best Practice on Mobile Network Development, for the shared use of telecommunications sites and the installation of antennas on tall buildings. In view of this position, and as the proposal is an acceptable design, we consider it is unnecessary to have regard to the issue of alternative sites in the determination of this application.

5.6 In support of this position, we draw your attention to the policy guidance in paragraph 115 of the National Planning Policy Framework, which deals with the sequential approach for site selection. This states that:

"115. Applications for telecommunications development (including for prior approval under Part 24 of the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

…(c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure ..."

5.7 This strand of national planning policy makes clear that information on alternative sites is required only in circumstances when it is not possible to install apparatus at existing telecommunications sites or on tall buildings and other structures. As the proposal before you relates to an upgrade of an existing base station, and accords with both circumstances, information on alternative sites is not provided or required to be submitted as part of this determination of this application.

(b) London Plan Polices

5.8 In respect of Development Plan considerations, the role of the development in the operator's network is supported by Policy 4.11 'Encouraging a connected economy' of the London Plan. This policy states that:

"Policy Strategic

A The Mayor and the GLA Group will, and all other strategic agencies should:

a facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive connectivity meeting the needs of small and larger enterprises and individuals

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."

5.9 The proposal is also supported by Policy SI6 Digital Connectivity Infrastructure of the draft replacement New London Plan, which is now at an advanced stage towards adoption following the completion of its Examination in Public and the publication of the 'Intend to Publish' version of the plan in December 2019. This policy includes in criteria 2 and 4 the respective aims of meeting the expected demand for mobile connectivity across London and supporting the effective use of rooftops for well-designed and suitable located mobile digital infrastructure to meet this demand. We also highlight that the installation of mobile digital infrastructure on the roof of the telephone exchange is consistent with the objectives of criterion F of Policy G2 Making

the Best Use of Land of the replacement London Plan, as this seeks to maximise the opportunities to use infrastructure assets for more than one purpose.

5.10 Also having regard to the importance of ICT and mobile broadband to the London economy, the Mayor has published two further documents relevant to the application proposal: the draft London Infrastructure Plan 2050; and the report *'Raising London's High Speed Connectivity to World Class Levels'.*

5.11 As part of the work on the 2015 London Plan Alterations, the Mayor commissioned work to develop a long-term infrastructure investment plan for London, and in 2014 the *'London Infrastructure Plan 2050'* was published for consultation. One of the stated aims of the Infrastructure Plan is to enable for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 Digital Connectivity of the Plan indicates how the Mayor's Office will support a mix of technologies including mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term, as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s.

5.12 These objectives are perhaps most clearly expressed in the Executive Summary of the plan, which provides the following statement:

"Digital connectivity. Our aim is for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 discusses how we will develop a map of London's connectivity, which will be used for connectivity ratings of individual properties and to identify where networks need to be improved. It sets out how we will support an economically viable mix of technologies including fibre broadband, mobile broadband and future methods of wireless internet delivery. It also discusses how we will work with Ofcom to ensure sufficient radio spectrum is identified to address the capacity crunch in the short term as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s."

5.13 The base station proposed fully supports the Mayor's Infrastructure Plan, as the coverage and services provided will allow, amongst others, businesses and residents in this part of the Council's administrative area to receive high-speed 5G mobile broadband internet connectivity on EE's network.

5.14 The Mayor's report: *'Raising London's High Speed Connectivity to World Class Levels'* provides the background to, and amplifies, Chapter 16 Digital Connectivity of his Infrastructure Plan. The report notes the availability of internet access not only affects the productivity of businesses and proves essential to the future growth of many firms but is also vital for many residents to take part in modern society, as more services move online. It also notes among other matters, that *'Mobile operators already experience difficulty obtaining permission from local authorities…to increase capacity for their networks in areas where there is high demand'.*

5.15 The Mayor, therefore, will be working with central Government and London's local authorities to ensure that strategic communication networks are enabled rather than inhibited by the planning and other regulatory systems. As a last resort and having regard to the strategic importance of London Plan Policy 4.11, the report states:

'The Mayor has overall strategic responsibility for planning in London…The communications network of London is clearly one of strategic importance. Should the implementation of the London Plan across strategic agencies not provide the adequate flexibility for the development of a robust communications network, whether based on existing technologies or future ones, the Mayor will seek to bring planning applications for communications infrastructure within this strategic responsibility, with the ability to take them over for his own determination…'

5.16 As with the London Plan and the draft London Infrastructure Plan, the application proposal is fully in support of the objectives of Raising London's High Speed Connectivity to World Class Levels.

(c) The Camden Local Plan 2017

5.17 The Camden Local Plan does not contain a specific policy for electronic communications development. Paragraph 5.10 Digital Infrastructure of the plan does, however, contain the following statement:

"5.10 The Council recognises the importance of digital infrastructure in enterprise development and expects electronic communication networks, including telecommunications and high speed broadband, to be provided in business premises."

5.18 The proposal accords with this objective, as it will enable EE to provide high-speed mobile broadband to the local community and the business near the application site.

Heritage Considerations

5.19 Maida Vale Telephone Exchange is a substantial, unlisted, building located a short distance to the south and west of the boundary of the St John's Wood Conservation Area at Greville Place and Greville Road. The telephone exchange adjoins the Islamic Community Centre at no.140 Maida Vale, which is included as Grade II in the National Heritage List for England under its previous use as the Mecca Social Club Carlton Rooms.

5.20 There are several buildings and structures included as Grade II in the National Heritage List for England within a 150m radius of the site at Greville Place and Greville Road. Most of these fall with those parts of the St John's Wood Conservation Area located in the City of Westminster Council's administrative area.

5.21 Camden Council has prepared the St John's Wood Conservation Area Appraisal and Management Strategy, adopted 2009, for the two separate limbs of the conservation area that adjoin the much larger designation within Westminster to the east and south east. It is the western limb of the conservation area that is closest to the application site.

5.22 Paragraph 3.6 of the appraisal provides the following description of the special qualities of the area:

"3.6 The Conservation Area's spatial character derives from the relatively low density residential development set out along spacious tree lined streets with generous plot sizes that create a feeling of space and openness without the need for formalised public squares and gardens. Development is predominantly of three storeys set back from the street with clearly defined front gardens. These often contain mature trees and planting that create a semi-rural feel, belying the reality of the inner city location. Even in those localised areas where commercial uses predominate the layout is such that the area is open and pleasant. The absence of any primary traffic routes within the designated areas adds to their quiet character (see Appendix 2)."

5.23 In relation to views and vistas, the appraisal provides the following analysis:

"3.7 Both sections of the conservation area are within wider areas of relatively low building density and as such the majority of views and vistas are into, out of and within the conservation area itself rather than in relation to other landmarks. The western section of the Conservation Area on its north-western boundary gives way to higher density post-war estates, which have open areas of land between estate blocks, but the resulting open views do not enhance the setting of the Conservation Area…

3.9 Notable views relating to the St John's Wood West section include:

i) View into the Conservation Area looking south-west along Boundary Road between the mid 19th century terraces.
ii) The view looking into the Conservation Area to the north-east along Greville Place.
iii) View south-east along Bolton Road, across Boundary Road into Belgrave Gardens in the City of Westminster's St John's Wood Conservation Area.
iv) The view out of the Conservation Area south-east into Westminster, St John's

Wood Conservation Area along Greville Road from the junction with Boundary Road…"

5.24 The general presumption in favour of allowing development for modern communications, and the special operational and technical factors that require siting of base stations within or adjoining conservation areas, and in proximity to Listed Buildings, is balanced by the need to conserve or enhance their heritage qualities.

5.25 This is reflected in the statutory duty imposed when considering applications for development within conservation areas and the related planning guidance contained in the NPPF, London Plan, the heritage protection framework provided by policies D1 Design and D2 Heritage of the Camden Local Plan.

5.26 Also relevant is the longstanding policy to minimise the potential environmental impact associated with electronic communications development by avoiding the unnecessary proliferation of sites for telecommunications development set out in the NPPF. This policy objective is backed with the statutory obligation placed upon mobile network operators to share sites, where practicable, under General Condition 3 (4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.

5.27 In relation to this statutory duty and the heritage protection policy framework, we have sought to minimise the impact of the development by the following means:

- Re-using existing pole-mounts to host the replacement antennas. While this requires some modification to the existing tripod frame located towards the northern side of the roof, the upgrade works will leave the siting of the apparatus unchanged from the existing layout

- Keeping the replacement antennas to the minimum height required to meet their technical objectives. The replacement antennas are marginally longer than the existing antennas that will be replaced as part of the planned upgrade

of the base station, but they will still below the height of the other antennas attached at upper roof level

- Installed the RRUs and BOB units close to the replacement antennas they support.

5.25 We consider that the careful approach taken to siting and design, will ensure that the development will not have any impact on the setting of the Grade II Listed Islamic Community Centre adjoining the application site. This is because the physical relationship between this heritage asset and the replacement antennas is essentially unchanged.

5.26 Similarly, the replacement antennas and other apparatus will not be visible in any of the key views and vistas identified in the St John's Wood Conservation Area Character Appraisal and Management Strategy. We also highlight that the character appraisal makes no specific reference to the telephone exchange. As this appraisal was adopted in July 2009, when most of the existing electronic communications apparatus was in situ, it can only be presumed that the drafter considered that the rooftop apparatus had no impact on the overall character and appearance of the conservation area.

5.27 Even if it were not accepted that the impact on the conservation area is trivial, any harm found would clearly be 'less than substantial' having regard to the guidance set out in section 16 Conserving the historic environment of the NPPF and the Government's Planning Practice Guidance.

5.28 Paragraph 196 the NPPF sets out a balancing exercise where the harm found is 'less than substantial'. This strand of national planning policy requires the harm identified should be weighed against the public benefits that flow from the development in terms of the substantial public benefits of providing 5G mobile phone coverage and connectivity services to the many people living, working, visiting or travelling through this part of London

5.29 In our opinion, the weight is overwhelmingly in favour of permitting the proposed installation and it, therefore, accords with the heritage protection policy framework provided by the NPPF, the London Plan, and the Camden Local Plan

Communications Infrastructure and the Planning Balance

5.30 The UK Government recognises that we are in a communications revolution with businesses and society in general using and relying upon all forms of modern communications to an ever-increasing extent. Consequently, the overall direction of travel in both statutory regulation and planning policy in recent years is one that tips the planning balance more favourably towards supporting electronic communications infrastructure

5.31 For example, in 2013 the Government launched the Mobile Infrastructure Project (MIP) that was implemented by Arqiva. The specific aim of the MIP was to address the public disquiet in areas with poor coverage by developing with public funds new shared base stations to end this unsatisfactory situation. The MIP was ended in March 2016 after the Government changed the obligations on the Mobile Network Operators to provide coverage over 90% of the UK landmass, as distinct from the population thresholds in their previous licence obligations.

5.32 At the time the MIP was closed, the Government was under pressure to take more affirmative action to improve mobile coverage and on 9 March 2016, this exchange (with our emphasis) took place in the House of Commons when David Cameron was Prime Minister:

"Dr Andrew Murrison (South West Wiltshire) (Con): The UK still has relatively poor superfast broadband and far too many mobile "not spots". Great work has been done, but what discussions will my right hon. Friend have with the Chancellor, in advance of next week's Budget statement, about how we can improve coverage further, particularly for rural small businesses in areas such as mine? The Prime Minister: My

hon. Friend is absolutely right to raise this issue. Since 2010, we have nearly doubled the number of homes and businesses with superfast broadband. We are on track on the 90% and 95% targets, but clearly more needs to be done. This is an issue for Members across the House. 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.****"*

5.33 That exchange preceded a review of the permitted development rights granted to electronic communications code operators, culminating in the greatest extension in the rights since they were originally granted in the 1985 iteration of the GPDO. Amongst other things, the rights were relaxed to:

- Extend the thresholds on masts in unprotected areas from 15 to 25m
- Extend the threshold on masts in protected land and on highways land to 20m
- Enable existing base station infrastructure within conservation areas to be upgraded through the installation of three antennas and three dishes without prior approval, subject to size limitations
- Enable existing ground-based masts within National Parks, Areas of Outstanding Natural Beauty and other areas of protected land to be upgraded by adding additional antennas and other apparatus in line with rights in non-protected areas.

5.34 In short, there is now statutory and planning policy recognition that the needs and growing demands on mobile services are such that a greater level of impact is regarded as both necessary and acceptable.

5.35 Furthermore, the evolution of Government policy continues in the same direction as it plans for the next generation of mobile services, commonly referred to as 5G. On the instructions of Government, the National Infrastructure Commission (NIC) reported in

December 2016 on how the UK should prepare for 5G. One of its recommendations was that local authorities should work together and with Local Enterprise Partnerships (LEPs) to develop coordinated local mobile connectivity delivery plans. Amongst other things, the NIC recommended that these plans should consider how the deployment of digital infrastructure can be established as a priority in local planning policy; and that town planning regulations should be examined again.

5.36 The Government has also instructed Ofcom to report on preparing for 5G and on 8 February 2017, it published a statement *'Update on 5G spectrum in the UK'*. Paragraph 2.10 of this report indicates that 5G is likely to entail an evolution of existing 4G macrocell base stations to provide the main coverage layer. This is relevant to the application proposal, as it will create a 5G enabled base station used by one of UK's mobile network operators.

5.37 In March 2017, the Government published *'Next Generation Mobile Technologies: A 5G Strategy for the UK'.* This clearly seeks to encourage improved digital connectivity which it recognises is now essential. It sets out clear steps that the Government plans to take, including the NIC recommendations referred to above. These objectives have since been reconfirmed in Section 1 Building a Digital Society of the NIC's consultation document *'Congestion, Capacity, Carbon: Priorities for National Infrastructure'* published on 17 October 2017.

5.38 Local planning authorities can, therefore, expect to have placed upon them a positive duty towards the provision of digital infrastructure, which would entail granting the necessary consents for base stations such as that now proposed at the application site. The Government has also commenced engagement with operators, including Arqiva and the Mobile Network Operators, about further town planning reform to ensure the deployment of 5G technologies and the many benefits they are anticipated to deliver. These include, for example, connected autonomous vehicles, smarter roads, smart cities and homes, agri–tech and improved health services.

5.39 These trends serve to increase the level of need and public demand for high quality mobile digital connectivity. Consequently, existing infrastructure must either be upgraded or, in locations where there is no existing infrastructure, it must be installed for the first time and this only increases over time.

5.40 In the light of the above, we consider that the careful approach taken to the siting and design of the apparatus demonstrates that all reasonable steps have been taken to minimise visual impact having regard to the technical and operational constraints that apply in this case. The proposal, therefore, accords with the various strands of telecommunications, design, and heritage planning policy set out in the NPPF and the Development Plan.

6. DESIGN AND SITING CONSIDERATIONS

6.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended. However, to assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. Due regard has been given to the factors listed in Appendix A of the Code of Best Practice.

Amount, Design, Layout and Scale of the Development

6.2 The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact, already referred to and explained in detail in the ***Supporting Operational and Technical Justification*** statement. With regard to the main component elements of the development proposed, we highlight the following:

- **Kept in proportion to the building or structure**

  The scale and size of the apparatus is not large and when installed should look proportionate to the building a whole. The replacement antennas are similar to the existing electronic communications apparatus installed on the building. They will, therefore, be seen in the context of this apparatus and will not appear as incongruous or jarring additions to the building or look out of place within this densely developed urban townscape.

- **Respect architectural style**

  Within the severe technical constraints, the apparatus will be installed in a manner that respects architectural style of the building and will appear as relatively minor additions at roof level.

- **Have minimal impact above the roofline commensurate with technical constraints**

  The apparatus that projects above the roofline has been kept to the minimum having regard to the technical parameters and design considerations explained above. The impact on the apparatus remains contained and views towards this apparatus from ground level will be limited.

- **Not be detrimental to views and general skyline**

  A combination of design, the backdrop provided by built development and perspective should help keep any perceived changes to views and the skyline to within acceptable limits. Indeed, within the context of this urban location the attention of the casual observer is likely to remain be focussed more upon the streetscape.

- **Avoid creating clutter**

  The apparatus should not look unduly cluttered and insofar as it might be visible it will be viewed as operational electronic communications equipment compatible and now expected on a building that already hosts a base station.

- **Antenna Array**

  The numbers of replacement antennas and their size has been kept to the minimum necessary to provide coverage for EE's 5G network. The design of these features is very much driven by operational and technical factors.

Access Considerations

6.3 Vehicular access to the site will be provided from the existing approaches to the telephone exchange from the A5 Maida Vale/Kilburn High Road. Thereafter, access to roof level will be provided from the established internal routes to the various roof levels. These existing routes do not require any amendment as part of the development proposed.

6.4 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing. In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff.

6.5 Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Landscaping

6.6 The proposed siting of the development has been very carefully chosen to minimise environmental impact. Any potential impact of the development is principally associated with the pole-mounted antennas, which are the most visible component of the base station, and which cannot be fully screened for operational reasons.

6.7 The proposed siting of the replacement antennas and other apparatus at roof level at heights of between 22-28m above ground level means that a scheme of landscaping would be unrealistic in any event.

Appearance

6.8 The sensitive approach to siting and design should minimise the appearance of the development proposed. Insofar as the component parts of the base station may be visible they should look straight forward in appearance and reflect their function. To that extent they should in time become accepted features of the townscape, as with other forms of communications networks and essentially public utility infrastructure such as roads and railways.

7. SUMMARY AND CONCLUSIONS

7.1 In summary, the application is in respect of a proposed upgrade to an existing electronic communications base station necessary to improve a vital network that provides public services.

7.2 The services provided by the operator is in the public interest and is in very high demand. In the UK mobile services now exceed fixed landlines in terms of customer numbers and usage. The public interest of the proposed base station is clear from the considerable benefits that will flow, and it makes a significant and major contribution towards sustainable objectives.

7.3 The operator's requirement is in the context of network needs associated with a cellular system. These impose particular locational and siting requirements. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.

7.4 The operator has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:

- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Arqiva.
- Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
- An examination of design options to try and minimise potential visual impact.

7.5 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.

7.6 This statement and the other accompanying material have demonstrated that the proposal is in accordance with local Development Plan policy, in so far as it is relevant to siting and appearance matters for permitted development, and national policy set out in the NPPF. It is a form of development that is specifically encouraged as a matter of principle – hence the planning permission granted by the GPDO - and in its detail complies with the policy objective of minimising potential environmental impact.

7.7 Consequently, we consider there are no grounds on which permission should be withheld for the implementation of permitted development rights to upgrade the existing base station at the application site.