SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	1-161 Taplow	Site Address:	Adelaide Road, London, NW3 3NU
National Grid Reference:	526922, 184230		
Site Ref Number:	CTIL_20762923	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: In the absence of a mast register, the applicant consulted the publicly available planning records in the area.		
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

[1] Macro or Micro

Summary of outcome/Main issues raised:

Pre-application correspondence was sent to the Local Planning Authority by email on 10th March 2020.

There were some comments received from the Local Planning Authority on 11th August 2020 with concerns regarding the positioning of the antennas close to the roof edge being highly visible and undesirable. They suggested if it were pushed back on the roof in a more central position then it is likely it would largely be obscured in local views as you can't see the plant room in views and they would prefer to see the clean roofline maintained.

The antennas work on a line-of-sight basis, and therefore need to be clear of any obstructions or clutter in order to operate optimally. Should the antennas be positioned more centrally, the height of the antennas will need to be raised in order to compensate, so that they are not impacted by the clipping of the rooftop edge. The subsequent tall pole mounts or stub tower is considered to have a greater visual impact than the proposed design, which is able to keep the antennas at a minimum height by being located on the edge of the roof. Due to the distance between the plantroom and furthest edges of the building, at least 5m to the underside of the antenna height would be required, which equates to 7m overall to avoid major clipping. This presents more visual impact than the current location of the antennas.

The suggestion to maintain the proposed antenna heights but to a location near the plant roof is not technically possible unless the height of the antennas is increase so that the building does not block the radio signals and render the site ineffective.

It was decided to proceed straight to a planning application.

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green

Outline of consultation carried out:

As with all Cornerstone proposals, the site and proposed works were assessed against the Traffic Light Model contained within the Code of Best Practice on Mobile Network Development. An amber rating was assigned in this and pre-application consultation letters were sent by email on 10th March 2020 to the Belsize Ward Representatives; Councillors Adams, Porritt and Simon and the Swiss Cottage Ward Representatives; Councillors O'Shanahan, Cassarani and Pearson. A pre-application consultation letter was also sent to the Local Member of Parliament; Ms T Siddiq on 10th March 2020.

On 10th March 2020 pre-application letters were also sent to 161 residential properties. A full list of consultees was provided to the Local Authority on 10th March 2020. This can be provided again on request.

Summary of outcome/main issues raised (include copies of relevant correspondence): One objection was received from an anonymous caller who raised concerns in regards to disturbance to residents.

School/College

Location of site in relation to school/college (include name of school/college): A search for schools and non-domestic childcare institutions was conducted via Ofsted and Department for Education databases. The nearest school was The UCL Academy which was located approx. 93 metres away. Swiss Cottage School is located approx. 236 metres. Trevor Rivers School is located approx. 195m away. Swiss Cottage Leisure Centre is located approx. 75 metres and Swiss Cottage Nursery is located approx. 111m away.
Outline of consultation carried out with school/college (include evidence of consultation): Pre-application consultation letters were sent to the UCL Academy, Swiss Cottage School, Trevor Rivers School, Swiss Cottage Leisure Centre and Swiss Cottage Nursery on 10th March 2020.
Summary of outcome/main issues raised (include copies of main correspondence): To date, no responses have been received.

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

Will the structure be within 3km of an aerodrome or airfield?	Yes	**No**
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	**No**
Details of response: No airfields are within 3km of the site.		

Developer's Notice

Copy of Developer's Notice enclosed?		**Yes**	No
Date served:	27th August 2020		

3. Proposed Development

The proposed site:
The application site is located on 1- 161 Taplow, a fifteen storey residential building, on Adelaide Road. Development in the area mainly consists of residential buildings, mixed with hotels and some commercial development. The level and scale of development in this area of London, combined with the road layouts, means that views of the building are not available over long distances, and it is therefore considered that there will be little in the way of significant visual impact caused by this proposal. The application site, on the rooftop of an existing structure, provides an excellent town planning solution and ensures that network coverage will be continuous. The use of existing buildings for telecommunications sites is supported by National Planning Policy as it prevents the site being located in a more densely populated area where there are fewer opportunities to screen it, so to minimise any visual impact further. The specific aim of this application is to enhance existing network services by increased capacity and allow for new 5G provision for Telefonica in the area. In order to achieve this, a site must be identified in reasonably close proximity to the community it is designed to serve. The existing main roof level is 65 metres, and the plant room roof level is measured 67.2 metres, this proposal will lead to an increase, to three sections of the rooftop to 68.25 metres. It is considered that this minimal height increase of 1.15 metres from the top of the existing plant room roof level and 3.25 metres increase to the main roof level is acceptable, as it will ensure that continuous network coverage for Telefonica will be provided to the surrounding area. This proposal also incorporates a future-proofing element, allowing improved 5G coverage to be provided from this location as the latest advancement in mobile technology is rolled-out across the UK. It is therefore considered that any visual impact caused by this proposal is greatly outweighed by the public benefits of ensuring that the established mobile network coverage is continued.

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

This site will also provide a dish link to multiple sites and so will be offloading and distributing traffic from these neighbouring sites, so therefore providing additional benefits to these sites.

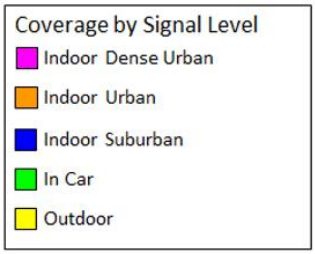
CTiL – Existing Telefonica Coverage without 44409

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

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

CTiL

CTiL – Existing Telefonica Coverage with 44409



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

CTiL

Type of Structure *(e.g. tower, mast, etc):*	
Description: The proposed development comprises the installation of 3no. 3.45m support poles (68.45m AGL) supporting 6no. antennas, 3no. 300mm dishes, the installation of 3no. cabinets and ancillary works thereto. 2no. cabinet with dimensions 750mm(w) x 600mm(d) x 1975mm(h) 1no. cabinet with dimensions 770mm(w) x 770mm(d) x 1900mm(h)	
Overall Height: 68.25 metres to the top of antennas	
Height of existing building *(where applicable):*	65 metres
Equipment Housing:	
Length:	As above
Width:	As above
Height:	As above
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Support poles- Galvanised steel
Equipment housing – type of material and external colour:	Steel- grey (unless otherwise requested by the Local Authority)

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

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

There are three main elements to a radio base station; the cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the links into the network either by fibre cabling or by dish antennas, power source (meter cabinet), feeder cables that link the equipment housing to the antennas and the various fixings, often referred to in general terms as "development ancillary to" the base station.

The type of technology being deployed determines the type of equipment and antennas required, which in turn impacts upon the type of support structure and or design methods than can be employed on an aesthetic level. In order for the base station to effectively provide coverage to the desired areas and fit in with the established network pattern, specific antenna orientations and heights, determined by the radio planners, must be achieved.

To achieve the required network coverage and network improvement for Telefonica 6no. antennas are required. As outlined within the application, the rooftop of 161 Taplow is proposed to be utilised, as this rooftop is able to accommodate the level of required equipment and offers a superior town planning solution.

Antennas will installed on three sections of the rooftop, 2no. antennas located to the north of the rooftop, 2no. antennas located to the south and 2no. antennas located to the west of the rooftop. The antennas height and position is determined by a specialist network engineer using specialist software which factors in the area that coverage is required; the relationship between the selected site location and existing cell sites in the linked network; and variances in land levels and elements such as nearby trees or buildings, which can block or weaken signals. The top of the antennas will protrude 1.15 metres above the existing plant room roof level at 67.2 metres and will protrude 3.25 metres above the main roof level at 65 metres. The 3.25 metre height increase is considered marginal and it is unlikely that this apparatus will be visible over long distances, given the height of the surrounding buildings in the area. There is no alternative design which could have been employed at this site. If the antennas were moved back then they would be clipped by the rooftop edges, unless taller support structures were used. Pole mounts are simple and, in this case, considered more visually appropriate than grouping the antennas in a much taller, more robust structure.

The antennas would be coloured grey as this would reduce the capacity of the equipment to draw the eye when viewed against the sky. Whilst the proposed colour scheme is considered wholly appropriate for this site, the applicant would be willing to

adhere to any colour scheme deemed more appropriate by the local authority and would like the opportunity to discuss this with the local authority during the course of the application process should this be the case.

The dishes are located on the rooftop where they can have a clear connection to the core network – ensuring that seamless connection between the cells can be made above the surrounding skyline clutter and any other obstructions. The size and height of the dishes are determined by the surrounding neighbouring cells. In this instance, 3no. 300mm dishes are required.

Radio signals are generated within radio equipment housing cabinets. 5no. cabinets are required to house the equipment at this site. These cabinets will be positioned in a neat linear arrangement to the east side of the rooftop, where views would be limited. The cabinets will be set back from the rooftop edge and so will not be readily visible from ground level. There will be 1no. meter cabinet positioned at ground level, located neatly against the north east side of the building, so to minimise any visual impact.

The installation would provide coverage for Telefonica and for multiple technologies: 2G, 3G, 4G and new 5G network coverage. An alternative would be a Street Furniture installation requiring 20m a monopole in order to provide the required network improvements. It is considered that installing equipment on an existing rooftop minimises visual impact and prevents the site being located in a more densely populated area where there are fewer opportunities to screen it.

As detailed, all apparatus required will play a vital role in the provision of improved network services for the Telefonica mobile network. The scale and amount of apparatus has been limited to the minimum with which this can be achieved at this site. Despite it being acknowledged that there will some visual change to this site, due to technical constraints, the design cannot be reduced any further, and although it is acknowledged that the installation causes some level of visual harm to the area, it is considered that the benefits to the network that this proposal brings is considered to outweigh the visual impact caused. Further to this, it is considered that this proposal offers the optimum solution in terms of environmental impact. The public benefit of this proposal greatly outweighs any impact on the building, or the wider setting, and the development has been designed to ensure that this is the case.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, Telefonica operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of Telefonica's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also	**Yes**	No

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

4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

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

The proposed development will enable the provision of 2G, 3G, 4G and new cutting-edge 5G services for the Telefonica and Vodafone mobile network in this part of London. 4G (LTE, the acronym used for 'Long Term Evolution') supports mixed data, voice, video and messaging traffic and offers speeds of up to five times faster than 3G, enabling network users with 4G devices to benefit from ultra-fast internet browsing, video streaming, gaming, e-mail and downloads. 5G is the next generation of mobile internet connectivity, offering faster speeds and more reliable connections on smartphones and other devices than ever before. Compared to even the most recent and efficient generation of mobile network, 4G, 5G is set to be far faster and more reliable, with greater capacity and lower response times.

High-quality communications infrastructure is essential for sustainable economic growth and that high-speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.

The UK Government, recognising the benefits to commerce, industry and the public in general, places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. Paragraph 122 of the NPPF (2018) states that "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) ..." The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal, to enable Telefonica and Vodafone to provide improved network services to the surrounding area, will assist in achieving these objectives within Camden.

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

"I attach significant weight to the public benefit arising from the continuation of local service provision…..Having regard to all relevant considerations... my findings are that the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area".

Furthermore, 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. Ofcom's 2018 Communications Market Research Report shows that smartphones are owned by four of every five UK consumers and smart TVs are in almost half of all households. Demand for data continues to grow rapidly for UK consumers, with 1.9GB consumed by an average mobile subscription per month in 2017, (up from 1.3 GB the previous year). The report found that more than seven in ten now use their mobile to access the internet.

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

On a wider scale, the proposal would contribute towards the country's connectivity and digital economy future. Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion. One of the numerous of this, 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 sustaining development agenda. Further to this, working from home is becoming increasingly important due to the current Covid19 outbreak and is essential for businesses to have access to adequate network coverage in all areas.

In the current climate, with a dramatic shift towards homeworking, online shopping and virtual social gatherings, the importance of connectivity for economic, social and physical wellbeing is more apparent than ever before. Infrastructure needs to be in place in order

for people to benefit from these services, and it needs to be located in or very close to the areas where the users are located.

National Planning Policy Framework places emphasis on encouraging the continued rollout of high-speed digital infrastructure networks, of which the proposed installation 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".

In this instance, this proposal will not replace an existing site, but rather add one to the existing network and ensure that the significant social and economic public benefits of enhanced connectivity services reach this part of London. This can be achieved at this location through this proposal, which is not situated on designated land. It is therefore considered to be a wholly appropriate solution.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.

5. Site Selection Process

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

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

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

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

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
1)Rooftop	Visage Apartments, Winchester Road, London, NW3 3NH	526876, 184188	This site is not preferred to the nominated option, as this will provide an inferior level of coverage to the required coverage area. Due to its close proximity, the taller building of Taplow may block coverage to a significant area behind it. This has been discounted on technical grounds.
2)Rooftop	Burnham, Fellows Road, London, NW3 3JJ	527040, 184311	Of the buildings to the west of the Chalcot Estate, Taplow represents the building best situated to provide the required coverage to the target coverage area. This building has been discounted on technical grounds.
3)Rooftop	Melrose Apartments, Winchester Road, London, NW3 3NG	526881, 184255	Site is not preferred to the nominated option, as this will provide an inferior level of coverage to the required coverage area. Due to its close proximity, the taller building of Taplow may block coverage to a significant area behind it. This has been discounted on technical grounds.
4)Rooftop	The UCL Academy, King Henry's Road, London, NW3 3AQ	526904, 184121	Site is not preferred to the nominated option, as this will provide an inferior level of coverage to the required coverage area.
5)Greenfield	Swiss Cottage Open Space, London, NW3 3NR	526806, 184271	A Greenfield site here would require a significant height of >30m to clear the surrounding buildings and provide the same level of coverage as the nearby rooftop options. Due to the visual impact of such a site, this site has been discounted on visual grounds.

6) Rooftop	Marriott Hotel Regent's Park, Hawtrey Road, London NW3 3ST	526991, 184190	The nominated site is a superior option from a technical perspective, due to the additional height of the building. Due to the technical requirement for the site to accommodate transmission dishes to link neighbouring sites, clear line of sight to the dish links is required, which cannot be provided on this site without significant steelwork height, which would have a significant visual impact. This site has been discounted on technical grounds.
7) Rooftop	Dorney, Fellows Road, London, NW3 3JJ	527375, 184389	The nominated site is the preferred building on the Chalcot Estate, and this site is located too far east to provide the required coverage to the target area. This site has been discounted on technical grounds.
8)Rooftop	Centre Heights, 137 Finchley Road, London, NW3 6JG	526610, 184341	O2 are already progressing a site on this location.
9)Rooftop	Langhorne Court, Dorman Way, London, NW8 0RU	526578, 184023	O2 are already present on this location.

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

N/A

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

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

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

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

Sites of Importance for Nature Conservation:

- Local
- Borough Grade 1
- Borough Grade 2
- Metropolitan
- Local Green Space

Town centres and employment

- Central London Frontage
- Town Centre
- Neighbourhood Centre
- Industry Area
- Hatton Garden Area
- Protected frontage: primary, secondary
- Primary (north)*, sensitive frontage*

*located in Camden Town only

Transport

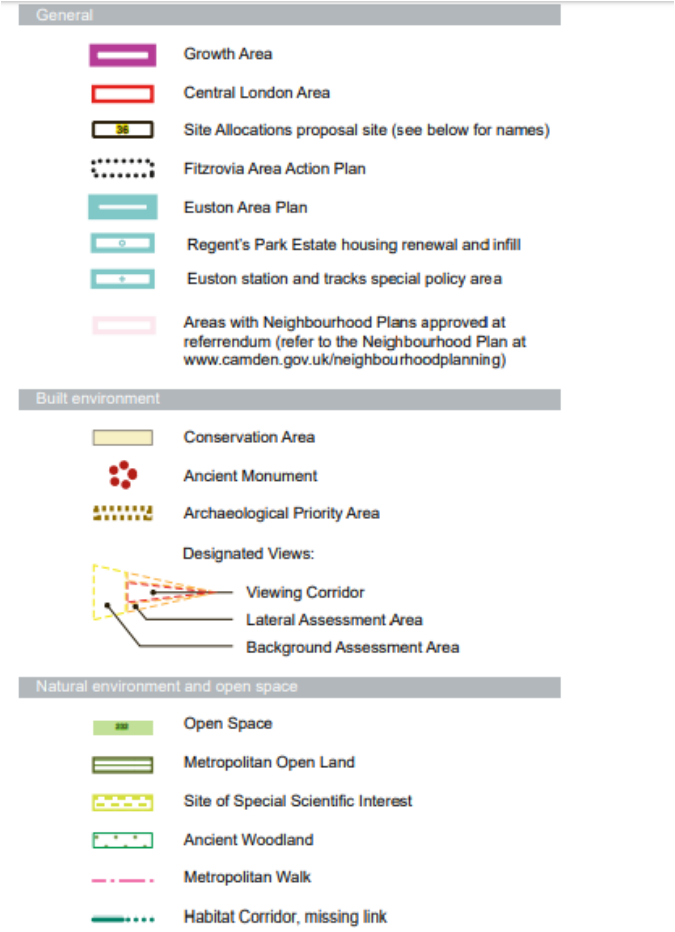
- Safeguarding Area

High Speed 2:

- HS2 Surface
- HS2 Sub Surface
- HS2 Homeowner Protection Zone 1
- HS2 Homeowner Protection Zone 2

Waste and minerals

- Waste Safeguarding Site
- Aggregate Safeguarding Site



The above map and key is taken from Camden's Proposal Map in Camden's Local Plan (Adopted July 2017) and confirms that the site is not located within any special land use areas or planning designations. The site is located approx. 116m away from Elsworthy Conservation Area and 87m from Eton Conservation Area.

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

Siting and Appearance

This section should be read in conjunction with the preceding sections of this statement where a description of the application site, technical details and justification for the design and details of the public benefits of the proposal are provided.

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

As highlighted previously, the proposal seeks to provide local communications and connectivity services through the installation of new telecommunications equipment which will result in a very small height increase to the existing rooftop.

It has already been detailed that views of the host building are limited to a relatively small area owing to road layouts, intervening developments, and buildings across the wider area. It has further been detailed that views of the proposed telecommunications apparatus from street level will be naturally restricted by the sympathetic design – i.e. antennas only exceeding 1.15 metres above the height of the existing plant room, and equipment cabinets positioned away from the rooftop edge. This design will reduce any perceived visual impact caused by this proposal, as far as practicable.

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

Further to this, the pole-mounted nature of the design will further assist in reducing any perceived visual impact which this development may cause. It is considered, given the building's location within the area, it may be considered that this type of development is exactly the type of development that would be expected on a rooftop such as this. Given the small height increase in height of circa 1.15 metres above the existing plant room, and the public benefits associated with the provision of new Telefonica coverage across the local area, the proposal is considered acceptable from a town planning and environmental perspective.

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 buildings to improve connectivity where possible, such as in this case. In this case, the technical requirement can be met through using an existing rooftop and allowing for the sharing of the site for two major operators, as opposed to the deployment of two new sites in the area. Therefore, the proposal is in line with this guidance by utilising this rooftop and keeping the overall amount of base stations to a minimum in the area.

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

Practical Applications of 5G Connectivity as Example of Material Soci-Economic Benefit:-

Education:

The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

Health:

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2019) (NPPF)

The new National Planning Policy Framework, which came into force in July 2018, replaces the guidance published in March 2012. The guidance has subsequently been updated in February 2019. The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "The purpose of the planning system is to contribute to the achievement of sustainable development", and in paragraph 10 that "at the heart of the Framework is a presumption in favour of sustainable development". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

"a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

For decision-taking (paragraph 11) this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or
d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Further to this, paragraph 38 states that "Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area."

The proposed development will enable the provision of reliable and improved mobile communications services to the surrounding area for Telefonica and Vodafone, bringing about substantial public benefit both socially as well as the allowing for certain businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the 'virtual office', thus reducing the need to travel and contributing to the sustainability agenda.

Government advice in recent years has been to promote and encourage communications services. Within his presentation to Parliament in July 2015 of the Government report "Fixing the Foundations: Creating a more prosperous nation" the Chancellor of the Exchequer reiterated the importance of a high-speed digital communication infrastructure. "7.1 Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

By reducing regulatory red tape and barriers to investment, the government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published in March, of near-universal 4G and ultrafast broadband coverage."

The NPPF (2019) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

"b) infrastructure for transport, telecommunications (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"
Leading on from this, paragraph 112 states that "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections".

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 113 states that "The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged".

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

It should be noted that paragraph 116 states that "Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure". Compliance with these guidelines (ICNIRP) is confirmed and a declaration of such is included with the application.

In summary, the proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

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

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

<u>The London Plan</u>

The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In Paragraphs 1.38-1.41 'Ensuring the infrastructure to support growth', the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to secure its long-term growth.

It is considered that the applicants' network is an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in Policy 4.11 'Encouraging a Connected Economy' of the Plan, which states that:

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

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

b. support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits."

At paragraphs 4.56 and 4.57 of the supporting written justification to policy 4.11, the Mayor "*wishes to ensure sufficient ICT connectivity to enable communication and data transfer within London, and between London, the rest of the UK and globally*" *and "…support ubiquitous networks – those supporting use of a range of devices to access ICT services beyond desk-based personal computers.."* Furthermore, at paragraph 4.57, the Mayor states the intention to "*…support competitive choice and access to communications technology, not just in strategic business locations but*

more broadly for firms and residents elsewhere in inner and outer London, and to address e-exclusion amongst disadvantaged groups…"

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

Local Plan

There are no policies relating directly to communications development within the development plan documents. General policies of relevance include D1 (Design) which requires a high standard of development, and policy D2 (Heritage), which aims to preserve and enhance Camden's heritage assets, including conservation areas and listed buildings. Development within conservation areas is required to preserve or enhance the character or appearance of the area.

It is considered the proposal complies with both policies. The scheme has been specifically designed for this location. The host building is substantial and the proposal would have a minimal impact on the application site and the surrounding area. Although visible from certain viewpoints any impact would be minimal, as the building is tall. The building is not located within any designated area, however, is close to two designated conservation areas, Elsworthy and Eton. The sympathetic design ensures there would be no harm to heritage assets.

The proposal will be sited on the roof of a building and therefore this will not hinder the character or amenity of the surrounding conservation areas. The antenna height has been minimised as far as is practicable to achieve the required coverage and to ensure ICNIRP compliance. The antennas, due to their limited height and bulk, will not dominant the skyline. Whilst the antennas will be visible in some street views, it is not considered they will have a detrimental impact on the visual amenity of the area given the limited scale of development and development in the area. The principle of introducing rooftop telecommunications apparatus to this site and wider environment is considered far more appropriate than the installation of new, ground-based equipment in the form of a telecommunications monopole, which would undoubtedly have a greater impact to the conservation area.

Long views of the proposed equipment will be limited by scale of development in the area all at a similar height. It should be highlighted that visibility, as in this case or a development's siting and appearance, does not automatically result in overwhelming adverse harm. As noted previously, it is believed the limited visual impact on the character and appearance of the neighbouring conservation area will be outweighed by the public benefit resulting from an improved public infrastructure network.

Also, of relevance is Camden Planning Guidance – Digital Infrastructure (2018). This document sets out as a key message that "The Council will support the expansion of electronic communications networks, including telecommunications and high speed broadband" and goes on to set out that proposals for telecommunications

equipment will be determined in accordance with the National Planning Policy Framework (see section above).

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

Overall, the proposal is the optimum siting option which is felt strikes a good balance between environmental impact and operational considerations and is fully in accordance with the council's development plan. In terms of national policy, the proposal is sympathetically designed, it would enhance the provision of local community facilities and services and would protect visual and residential amenity. The impact of the development would be outweighed by the significant benefits of the proposal.

Summary

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

This application involves the installation of a new telecommunication site to provide enhanced and increased capacity and allowing for new 5G provision for the Telefonica mobile network. The installation has been designed to minimise the visual impact to the surrounding area as much as possible. Installing telecoms apparatus on a rooftop allows the character of the area to remain the same as the equipment will not be readily visible from ground level. It is considered the proposal complies with both national and local policy. It is of significance that the development ensures a continued provision of local community facilities and services. The significant network benefits this proposal will bring to the immediate surroundings, as well as the neighbouring sites, are considered to greatly outweigh the minor visual impact of the site to the building and area.

The proposal is fully compliant with ICNIRP guidelines.

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

Confirmation that submitted drawings have been checked for accuracy

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