SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Mullen Tower	Site Address:	Mullen Tower 85 Mount Pleasant London WC1X 0AG
National Grid Reference:	E531041 N182094		
Site Ref Number:	MTR058	Site Type:[1]	Macro

2. Pre-Application Check List

Site Selection

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
If no explain why: No register available.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: This is not an application for the deployment of a 'new' traditional telecommunications base station, but rather the deployment of a 'replacement' Emergency Services Network (ESN) base station. The existing ESN base station is situated on the rooftop of Thavies Inn House, 3-4 Holborn Circus, Mid-Town, London, EC1N 2JT and is due to be decommissioned and removed. As such, there is an established coverage footprint which is serviced by the existing ESN apparatus at Thavies Inn House. This coverage footprint must be replicated from a new base station to ensure that Emergency Services coverage is continuous across the local area. The industry databases are therefore not relevant to this proposal.		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	21/9/2020
Name of contact:	

[1] Macro or Micro

Summary of outcome/Main issues raised: A pre-application consultation letter was issued to The London Borough of Camden Council on 21st September 2020. This letter contained details of the proposed installation of Airwave (Emergency Services) apparatus, as well as design drawings. Feedback was requested from the Council. As of the date of the submission of this planning application, no formal response has yet been received from the Council.

Community Consultation

Rating of Site under Traffic Light Model:		Amber	
Outline of consultation carried out: A pre-application consultation letter was issued to the local Ward Councillors of the Holborn & Covent Garden Ward. Detailed design drawings of the proposal were provided alongside the consultation letter and feedback was requested. An extensive neighbour notification exercise was undertaken, with all residential properties within Mullen Tower issued a pre-application consultation letter. Feedback was requested from residents. Pre-application consultation letters were issued to the following properties: • Flat 1 – 33 (inclusive), Mullen Towers, Mount Pleasant, London, WC1X 0AG			
Summary of outcome/main issues raised (include copies of relevant correspondence): As of the date of this planning submission, no formal response has been received from the Ward Councillors or any local resident.			

School/College

Location of site in relation to school/college (include name of school/college): Christopher Hatton Primary School, 38 Laystall Street, London, EC1R 4PQ is approximately 20 metres away from the application site. 1a Children's Centre, 1a Rosebery Avenue, London, EC1R 4SR approximately 45 metres away from the application site.
Outline of consultation carried out with school/college (include evidence of consultation): Given the limited amount of apparatus which is proposed as part of this ESN base station (3no antennas and 2no transmission dishes), at a height of 36 metres+, it was not considered necessary to undertake a pre-application consultation exercise with the above establishments.
Summary of outcome/main issues raised (include copies of main correspondence): N/A

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

Will the structure be within 3km of an aerodrome or airfield?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/A – Full Planning Application		

Developer's Notice

Copy of Developer's Notice enclosed?			No
Date served:	N/A – Full Planning Application		

3. Proposed Development

The proposed site:
The site is the rooftop of Mullen Tower on Mount Pleasant. The building measures 36 metres in height to the lower roof level and 39.5 metres to the top of the plant room. The plant room currently accommodates a number of domestic aerials and satellite dishes. The building sits within the Hatton Garden Conservation Area. A new Emergency Services Network (ESN) base station is proposed on the rooftop. The current ESN base station which services this area is positioned on the rooftop of Thavies Inn House, approximately 550 metres to the south of the application site. The existing installation is due to be decommissioned and removed. Consequently, a new ESN base station is required to replicate the current coverage footprint provided from Thavies Inn House to ensure that Emergency Services Network coverage is continued. Without a replacement installation, this area will be left with an ESN coverage hole and a major public safety issue. This proposal will install three pole-mounted antennas on three corners of the rooftop, plus the installation of two transmission dishes on another supporting-pole. The necessary equipment cabinets will be positioned internally within the building to ensure the least apparatus practicable will be deployed on the rooftop. It is therefore considered that this development will not have a significant negative impact on the visual amenity of the host building, or the surrounding area, and, when compared to the direct impact it will have on ensuring the Emergency Services Network coverage is continuous, then the proposal should be supported by the Local Planning Authority. The scale and massing of the surrounding buildings, and the small level of apparatus which is proposed to be deployed, will ensure that public views of the proposed installation will be filtered to some degree, and, as such, any perceived visual impact will be reduced as far as practicable.

Type of Structure *(e.g. tower, mast, etc):*	
Description: The installation of 3no pole-mounted antennas and 2no 300mm pole-mounted transmission dishes on to the building rooftop, plus the installation of an internal, ground-based equipment cabin and meter cabinet, and ancillary development thereto.	
Overall height of proposed rooftop equipment on the building:	39 Metres
Height of existing building:	Circa 39.5 Metres
Equipment Housing:	
Length:	N/A
Width:	N/A
Height:	N/A
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Steel – Galvanised
Equipment housing – type of material and external colour:	N/A

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

In designing the proposed installation, the applicant has sought to achieve a balance between the technical requirements of the Emergency Services Network and minimising environmental impact as far as 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 cabin or cabinets which contain the equipment used to generate the radio signals, 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). 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 or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

The application proposes to install three pole-mounted antennas and two pole-mounted transmission dishes on to the rooftop of Mullen Tower on Mount Pleasant. This installation will replace the existing Emergency Services base station which services the local area, which is due to be decommissioned. The proposed base station would provide continuous Emergency Services network coverage and ensure that the network itself is utilising the best, and most reliable, apparatus available to ensure the security of the network. The maintaining of this essential Emergency Services Network coverage to the wider area is of vital importance and it should be noted that any minor impact of the proposed development would be greatly outweighed by the significant public, and safety, benefits of the proposal.

The rooftop currently accommodates domestic antennas and satellite dishes on the plant room. The height of this plant room, which is the highest part of the building, is approximately 39.5 metres. The Emergency Services Network apparatus will have a ‘top height’ of 39 metres, and the increase in height will be isolated to three separate locations (where the three individual pole-mounted antennas are due to be positioned). The proposed development will lead to height increases at these three separate locations, but no overall increase to the ‘top’ height of the building. The proposed height increase of 3 metres at these three separate locations is considered acceptable when compared to the continued provision of Emergency Services Network coverage that this replacement ESN base station will achieve. Should this application not be supported, and the existing Emergency Services apparatus decommissioned and removed, the result will be a severe reduction in ESN services across the local area, which in turn will result in significant public safety issues.

The installation of a new base station at the application site is considered to offer the best option from an environmental and town planning perspective, whilst simultaneously achieving the technical requirements associated with replicating the current coverage footprint of the existing Emergency Services base station.

Whilst it is accepted that the installation will be visible on the building rooftop, it is considered that the limited equipment that will be deployed, at a height of 36 metres, is wholly acceptable, especially when balanced against the continued provision of Emergency Services Network coverage. These public safety benefits are considered to greatly outweigh any perceived visual harm associated with the installation of the proposed apparatus. It is also considered that, in any event, this apparatus is unlikely to have a significant, negative visual impact on the amenity of

the rooftop, any nearby heritage assets, or the wider area. The site has been specifically selected to ensure the impact of the development is kept to an acceptable level and minimised as far as practicable.

It is considered, overall, that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact.

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, Airwave Solutions Ltd 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 Airwave's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.	**Yes**	

4. Technical Justification

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

Airwave Solutions Ltd provide a secure and reliable communications network for the UK's Emergency Services (Police, Fire and Rescue, and Ambulance). Airwave Solutions Limited owns and operates the public safety network in Great Britain. Part of the UK's Critical National Infrastructure, the Airwave service is a secure digital radio network for the exclusive use of the UK's emergency and public safety organisations. The Airwave service operates on a 24/7 basis providing essential day to day communications, as well as during times of major planned and unplanned events. As part of the Government's Critical National Infrastructure, it is designed to operate even during major incidents when conventional mobile and fixed telephony networks may overload or fail. It also allows the emergency services to communicate directly with each other at the scene of an incident.

Airwave's benefits include;

- Digital voice quality
- Much faster call connection
- Better coverage, including places that were previously hard to reach
- Real-time access to critical information, locally and nationally
- More effective use of control room resources, particularly when dealing with major incidents
- Sophisticated encryption techniques, which prevent unauthorised scanning or monitoring.

Airwave currently has a requirement to replicate the current coverage footprint provided by an Emergency Services Network base station on the rooftop of Thavies Inn House, 3-4 Holborn Circus, Mid-Town, London, EC1N 2JT, which is soon to be decommissioned and removed. The installation of this replacement base station will thereby ensure that these vitally important services are continued within the local area.

As this is not an application for the installation of a traditional telecommunications installation, it should not be treated as such. This proposal relates to a very specific requirement to replicate the existing Emergency Services Network coverage across the wider area, and, should this application not be supported by the Council, this would result in the loss of Emergency Services Network coverage across this area of London, and a significant public safety issue.

5. Site Selection Process

Alternative sites considered and not chosen

Site Type	Site name and address	Reason for not choosing site
Rooftop	Vesage Court, 8A Leather Lane, London, EC1N 7SS	An option was identified at this location. However, as Vesage Court is situated directly opposite the Prudential Assurance Building (Grade II* Listed), it was considered that this location would not offer the positive environmental and town planning criteria which is evident at Mullen Tower. As such, this option was discounted.
Rooftop	Langdon House, Leather Lane, Clerkenwell, London, EC1N 7TN	An option was identified at this location. Whilst this location would provide a viable technical solution, it was considered that the building's location in the centre of the Hatton Garden Conservation Area, and in close proximity to a number of Listed Buildings, would be more visible than any development at the application site. As such, Mullen Tower is considered to provide a more desirable environmental and town planning solution and Langdon House was therefore discounted.
Rooftop	7 High Holborn, London, WC1V 6DR	An option was identified at this location. However, the configuration of the rooftop would make the installation of telecommunications apparatus problematic. Additionally, this option is situated in close proximity to a number of Listed Buildings. As such, this option was discounted.
Rooftop	326-328 High Holborn, London, WC1V 7PE	An option was identified at this location. Whilst this location would provide a both viable and technical solution, it was considered that the preferable town planning option is that of Mullen Tower, which would also provide better network enhancement to the ESN when the existing installation is removed.
Rooftop	120 Holborn, London, EC1 2TD	An option was identified at this location. However, as this building sits prominently on a major transport junction, it is anticipated that, when compared to the application site at Mullen Tower, the application site offers the preferable town planning and environmental criteria to absorb the necessary apparatus. As such, this option was discounted in favour of Mullen Tower.

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

Paragraph 113 of the revised 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."*

This proposal is for the installation of a replacement Emergency Services Network (ESN) base station and not for the development of an additional ESN site. The existing installation at Thavies Inn House, 3-4 Holborn Circus, is due to be decommissioned which will create a coverage gap. This installation will address this issue and will ensure that ESN network provision is continuous.

This ESN site will play a very specific and significant role in ensuring comprehensive service coverage for the Emergency Services Network and should therefore be encouraged and supported by the Council.

As the proposed development will replace an existing and established base station, the result is no net increase of telecommunications sites within the area (i.e. a one-for-one swap). This wholly accords with national planning guidance. It is considered that, although there are alternative locations within the area that could be used for the deployment of the necessary apparatus, none of these options provide a better environmental and town planning option than the one which has been brought forward at Mullen Tower.

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

Siting and Appearance:

It is considered that the proposed location is the least visually intrusive site and design available to the applicant which will ensure suitable continued Emergency Services Network coverage can be provided to the local area, once the existing installation is removed. The site is a building rooftop, approximately 36 metres in height, and the proposed apparatus has been reduced to the maximum extent, in terms of both height and scale. Additionally, all equipment cabinets will be positioned internally within the building, to ensure that the least apparatus possible will be deployed on the rooftop. It is therefore expected that the proposed scheme will not appear as an incongruous feature on the rooftop, and, when balanced against the public benefits of the scheme, the Council should find in favour of the development.

For operational reasons, it is imperative that the antennas sit above the rooftop and therefore network signals are not obscured or blocked. As discussed previously, the proposed development will result in three small, isolated height increases where the three supporting poles will be deployed. The overall height of the building is 39.5 metres (to the top of the plant room). The proposed scheme will not lead to an overall increase in the height, with the top height of the three proposed antennas being 39 metres. This is considered acceptable from a town planning and environmental perspective, as the proposed design has been minimised in both height and scale to ensure that visual impact is reduced as far as practicable. Given the significant public benefits, in terms of providing continuous Emergency Services Network coverage for the Police Service, Fire and Rescue Service, and Ambulance Service, it is considered that these benefits greatly outweigh any perceived negative visual impacts

associated with the deployment of this apparatus. Given the height of the rooftop (36m) and the very limited scale of the proposed apparatus, it is unlikely that the scheme will cause any significant harm to the setting of the building, the surrounding area, or the Hatton Garden Conservation Area. If it is perceived that any harm will be caused, then this must be weighed against the significant public safety benefits which will be brought forward as part of this proposal. As such, it is not considered that any significant harm that may be caused by this scheme will outweigh the benefits, and that this application should therefore receive Officer Support.

To further reduce the proposed apparatus on the rooftop, all equipment cabinets will be deployed internally and will therefore cause no further visual impact on the host building, or its surroundings. Replacing the existing base station (on the rooftop of Thavies Inn House, 3-4 Holborn Circus) with another on the rooftop of Mullen Tower, assists in keeping the overall number of installations to a minimum (i.e. no net gain of telecommunications sites), and therefore also keeping the overall visual impact of development, within the Council area, to a minimum.

The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting the technical requirement of the Emergency Services Network and avoiding harm to the site or the surrounding area. The equipment selected for deployment has been scaled down, with three pole-mounted antennas proposed, as opposed to a single, more robust, stub tower on the rooftop of the plantroom. It is considered that this location offers the optimum location to replicate the existing coverage footprint and ensure continued ESN coverage to this part of London. This is certainly in the public interest. As such, equilibrium will be more than achieved between technical requirements of the site, and environmental impact.

Planning Policy Context:

The new National Planning Policy Framework came into force in July 2018 replacing 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*."

Whilst the deployment of a replacement ESN site differs from that of the deployment of an additional traditional telecommunications site, some of the detail above included within the NPPF policy is therefore not relevant. However, as this proposed base station will enable the continued provision of enhanced reliable Emergency Services Network coverage to the wider area, it will in itself bring about a substantial public benefit in terms of public safety, as well as improved provision of a vital communications network.

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*".

By replacing an existing Emergency Services Network cell, and therefore creating no net gain of base stations within the Council's area, the proposal is in line with the above policy.

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*".

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 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 plan for the London borough of Camden Council, relevant to the proposal, comprises:

- The London Plan: Spatial Development Plan for Greater London;
- Camden Local Plan (adopted July 2017).

<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 the Emergency Services Network to provide continued and vital emergency services coverage to the surrounding area.

<u>Camden Local Plan (adopted July 2017)</u>

There are no policies relating directly to telecommunications development within the Camden Local Plan (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 Hatton Garden Conservation Area), but it is it considered that there will be no significant impact on heritage assets and that the proposed development is acceptable. Given the limited apparatus which is proposed on the rooftop, and the fact that the equipment cabin and cabinets will be positioned internally within the building, the visual impact on the proposed scheme is considered to have been minimised as far as practicable. It is therefore considered that the proposal is acceptable and will result in major public benefits in terms of continued Emergency Services Network provision.

As there is no specific telecommunications policy within the Camden Local Plan (2017), then greater weight should be given to the National Planning Policy Framework (2019) (NPPF), which, as outlined above, is largely supportive of telecommunications development.

Additionally, as this installation will solely operate the Airwave Emergency Services Network, there is no opportunity to share masts. It is considered that the proposed development has been appropriately designed to take into account the local setting, streetscene and skyline.

The NPPF supports a sequential approach to identifying sites to be utilised for telecommunications purposes – firstly looking to utilise existing structures and buildings, and, if this is not possible, then identifying suitable locations for new ground-based masts. As the use of a building rooftop is proposed as the application site, then this is in alignment with national planning policy. Additionally, as this proposal will result in continued ESN coverage across the local area, which is a major public safety issue, and therefore wholly accords with national planning policy.

No conflict has been identified with any other Development Plan policies.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy, it minimises the number of installations by directly replacing an existing ESN base station, which is soon to be decommissioned and removed. The existing coverage footprint will be replicated by the proposed development on the rooftop of Mullen Tower.

Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators (including Airwave) have obligations to meet customer demands for a continued and improved quality of service. In this instance, in regard to maintaining and improving the Emergency Service Network (ESN).

The specific requirement for Airwave to replicate the existing ESN coverage across the local area, prior to the decommissioning of the existing ESN base station. This proposal achieves this aim. The proposed development is compliant with the NPPF. This siting and design are considered the most appropriate solution to providing the coverage requirements to the area.

The proposal is fully compliant with ICNIRP guidelines.

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Signed:	*N. Allan*	Company:	Waldon Telecom
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