SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Park Place	Site Address:	254 Kilburn High Road, London, NW6 2BS
National Grid Reference:	524964, 184287		
Site Ref Number:	CTIL_14576022	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
Summary of outcome/Main issues raised: Pre-application correspondence was sent to the Local Planning Authority by email on 23rd September 2020. To date, no response has been received. It was decided to proceed without formal advice straight to a planning application.	

Community Consultation

[1] Macro or Micro

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 instance and pre-application consultation letters were sent by email on 23rd September 2020 to the Kilburn Ward Representatives; Councillors Beattie, Eslamdoust and Gardiner. A pre-application consultation letter was also sent to the Local Member of Parliament; Tulip Siddiq on 23rd September 2020.

On 23rd September pre-application consultation letters were sent to 31 selected residential properties on Kilburn high Road and Espalier Gardens. A full list of consultees was provided to the Local Authority on 23rd September 2020. This can be provided again on request.

Summary of outcome/main issues raised (include copies of relevant correspondence):

One resident objection was received, stating that they would not support this proposal going forward.

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 Kingsgate Primary School which is located approx. 117m away. Kilburn Grange School is located approx. 346m away. Kingsgate Play Centre is located approx. 117m away and Chaston Nursery School is located approx.. 158m away. Kilburn Grange Children's Centre is located approx. 158m away.

Outline of consultation carried out with school/college (include evidence of consultation):

Pre-application consultation letters were sent to Kingsgate Primary School, Kingsgate Play Centre, Chaston Nursery School and Kilburn Grange Children's Centre on 23rd September 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

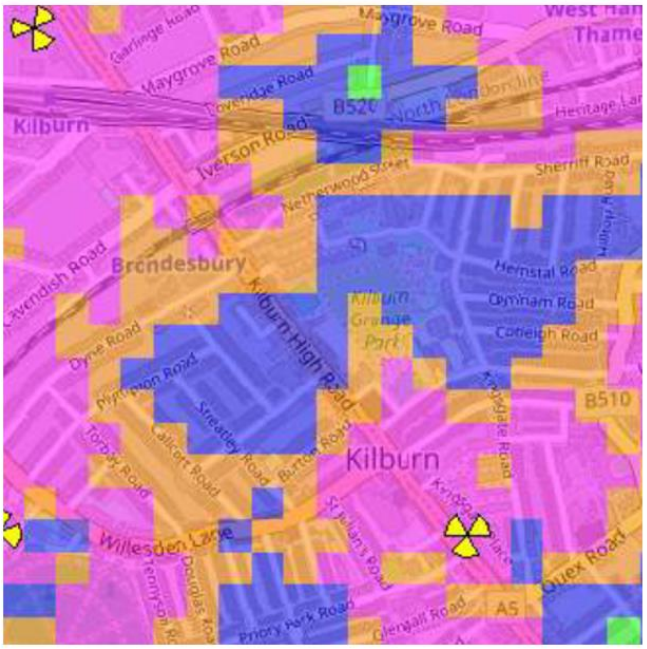
Copy of Developer's Notice enclosed?		**Yes**	No
Date served:	16th November 2020		

3. Proposed Development

The proposed site:
The application site is located on the rooftop of a six storey residential building; Park Place. The building is located along Kilburn High Road, a local shopping parade mixed with residential building. The area is predominantly residential in character. Development consists of a mixture of local shops and residential dwellings. Located to the east of the site is Kilburn Grange Park. 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 provide improved 2G, 3G, 4G and new 5G network coverage 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 roof level measures 21.5 metres, this proposal will lead to a 2.7 metre increase to the roof level. It is considered that this minimal height increase 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 this area of Kilburn. These plots do not show the improvement to the capacity of the network, which will also be significantly improved. 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.

CTiL – Existing Telefonica Coverage



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 - UMTS Telefonica (3G) Coverage with 44389

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

Type of Structure *(e.g. tower, mast, etc):*	
Description: The proposed development consists of the installation of 3No. 3.0m support poles (height 24.5m AGL) to support 6No. antennas and 2No. 300mm dishes, 3No. cabinets at rooftop level and ancillary works thereto. 1no. cabinet with dimensions 750mm(w) x 420mm(d) x 133mm(h) 1no. cabinet with dimensions 180mm(w) x 80mm(d) x 180mm(h) 1no. cabinet with dimensions 705mm(w) x 831mm(d) x 2068mm(h)	
Overall Height: 24.2 to the top of antennas	
Height of existing building *(where applicable):*	21.5 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.

The purpose of this installation is to provide improved 2G, 3G, 4G and new 5G network coverage for Telefonica in the area. In order to achieve this the installation of new base station is required.

As outlined within the application the rooftop of Park Place is proposed to be utilised, as the rooftop is able to accommodate the level of required equipment and offers an excellent town planning solution.

To achieve the required coverage and network improvement for Telefonica 6no. antennas are required. The antenna height and position is determined by a specialist network radio 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. Antennas will be installed on three sections of the rooftop, 2no. will be located on the north west of the building, 2no. will be located near the centre to the east of the building and 2no. will be located to the south west of the building. The top of the antennas will protrude 2.7 metres above the main roof level. The antennas have been positioned to aim to find the optimal compromise relative to the edge of the rooftop. Should the antennas be located more centrally on the rooftop, the height of the antennas would have to increase (in order to avoid signal clipping) and therefore cause a greater visual impact on the surrounding area. However, the antennas have been positioned slightly back from the edge of the rooftop to put them out of line of sight for the residential balconies below. Pole mounts are simple and in this case considered more visually appropriate than grouping the antennas in a much taller, more robust structure. The height of the antennas has been kept at it's lowest functional level to avoid clipping by the rooftop edges and would not provide the required network to the target area.

If the antennas were to be located centrally on the rooftop, then a stub tower of approximately 8 metres would be required. This would be necessary in order to avoid major clipping due to the length of the building. It was considered that the use of GRP screening would not fit with the design of the building. The GRP would look out of place on the rooftop due to the locations of the three antenna sectors. With this in mind, the exposed slim antennas has been considered to have the lowest visual impact, especially when considering the light colour of the antennas against an often bright backdrop of the sky and clouds.

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, 2no. 300mm dishes are required.

Radio signals are generated within radio equipment housing cabinets. 3no. cabinets are required to house the equipment at this site. These cabinets will be positioned in a neat arrangement in the centre of the rooftop, where views would be limited or not possible from beyond the rooftop. The positioning of the cabinets has been aligned with the centrally located antenna sector, in order to minimise the vertical elements on the

rooftop. The cabinets were not able to be located at ground level due to space constraints and operational feasibility.

It is considered that this design is appropriate at this location, enabling the proposed installation to be assimilated into its environment without significant adverse impact on neighbouring properties or the wider visual amenity and maintaining the character and appearance of the surrounding conservation area.

As detailed, all apparatus required will play a vital role in the provision of 2G, 3G, 4G and new 5G services for Telefonica mobile network. The scale and amount of apparatus has been limited to the minimum with which this can be achieved, with the result that the level of visual change at the site would be negligible and any harm to the host building, its setting or the wider area, is avoided. It is considered that this proposal offers the optimum solution in terms of environmental impact. It is also considered that 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	**Yes**	No

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

4. Technical Justification

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 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. The technological improvement of 5G when compared to 4G is particularly noticeable in three areas.
Firstly, the bandwidth of 5G is around 40 times faster than current 4G speeds, which will enable large amounts of data to be transferred in a few seconds – for example a full length HD movie of 15GB will take around 6seconds to download on 5G.
Secondly, 5G has an ultra-fast 1ms latency time, providing reliable and near-instantaneous responses between instructions to devices. This would result in an autonomous vehicle travelling at 100km/h would receive a stop signal after moving just 2.7cm. Connections are also ultra-reliable, with a very low error-rate.
Thirdly, 5G is able to support up to 1,000,000 devices within a 1km2 area, which will provide the backbone for the evolution of the Internet of Things.

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 (2019) 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*".

More recently in July 2020, the Planning Inspectorate has overturned the decision of the Council of the Royal Borough of Windsor and Maidenhead to refuse planning permission for the installation of 2no. GRP chimneys housing 6no. antennas and ancillary works thereto

(Cornerstone and Telefonica UK Limited Vs Council of the Royal Borough of Windsor and Maidenhead, appeal reference APP/T0355/W/20/3246710). The Inspector noted that, although the proposed development would fail to preserve or enhance the character or appearance of the Eton Conservation Area, the benefits that come with a high-quality and reliable network infrastructure is essential for economic growth and social well-being:

"Taking all of the above public benefits, in particular the support given within the Framework for the delivery of mobile technology and the absence of suitable alternative sites within the vicinity and applying the balancing test of paragraph 196 of the Framework, I am of the view that taken together, these provide a clear and convincing justification to outweigh the considerable importance and weight to the desirability of conserving the heritage asset, which in this case is the Eton Conservation Area."

Furthermore, Appeal decisions by the Planning Inspectorate can be of material consideration in the determination of planning applications. The cases below are examples where the Inspector has confirmed the significant public benefits from improved digital communications networks, outweighs less than substantial harm to heritage assets. The Cases outlined below, relate to the installation of rooftop telecommunications equipment located either within or near a Conservation Area, that are also sited within the setting of or near to listed buildings. The application proposal is not within such designated areas and therefore this should weigh in its favour.

1. APP/V5570/W/20/3246770 - Cornerstone Telefonica and Vodafone vs London Borough of Islington
"I have found that the proposal would fail to preserve the character or appearance of the CGCA (Conservation Area) and would cause a minor level of less that substantial harm to the heritage significance of the CGCA and various other designated assets through development within their settings. I have also identified associated policy conflicts. Indeed, the proposal conflicts with the development plan when read as a whole.

However, I have also found that the proposal would deliver significant public benefits through improved digital communications networks. These benefits would outweigh the heritage harms that I have identified. Thus, material considerations indicate that, in this instance, the proposal should be determined other than in accordance with the development plan." This proposal will provide new and improved network coverage for Telefonica (O2) and for multiple technologies, including 2G, 3G, 4G and 5G and as such it is considered that the enhanced public benefits will outweigh any minimal visual impact that the proposal may have on the surrounding area.

2. APP/V5570/W/20/3251047 - CTIL and Telefónica (O2) Vs. Council of the London Borough of Islington
'there would be a considerable public benefit arising from the provision of improved digital communications networks in this busy commercial area, and I consider that this carries significant weight.'
'the proposal would fail to preserve or enhance the character or appearance of the Bunhill Fields and Finsbury Square Conservation Area, and would cause less than substantial harm to the significance of the Conservation Area as a designated heritage asset. In this respect I have also found conflict with planning policies, and indeed the proposal would conflict with the development plan as a whole' and 'However, I have also

found that a significant public benefit would be delivered through the provision of improved mobile communications networks, which would outweigh the limited harm to the heritage asset which I have identified. The material considerations therefore indicate that, in this case, the proposal should be determined other than in accordance with the development plan.'

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. The benefit of having a strong and resilient network has been highlighted in recent months following the sudden shift in the network requirements, as the demand on the network in residential areas has increased with home-working. Research by Ofcom, Online Nation 2020 found that until early this year, online video calling was used much less than other online communication services, with 35% of online adults using online video calling at least weekly in the 12 months to February 2020. 26 In May 2020, this had doubled to 71% of online adult consumers using online video calling services at least weekly, with 38% using them at least daily. Our research suggests that 7% of adult internet users used video calling for the first time as a result of the coronavirus pandemic.

The DCM and the RT Hon Oliver Dowden CBE MP highlighted the need for telecommunications companies to support the NHS by providing the connectivity it needs during Covid-19, in April 2020:
"Telecoms companies and their workers are making a major contribution to keeping the nation connected during the COVID-19 emergency, ensuring that people can stay and work from home."

In the current climate, with a dramatic shift towards home-working, 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. Digital Infrastructure Minister Matt Warman spoke of the Government's priority of a strong and resilient network in his keynote speech at Connected Britain, September 2020:
"The world is in the middle of a digital revolution. COVID has accelerated this process, digitising almost every part of our everyday lives and making the infrastructure that connects us more important than ever. That's why it is at the top of the government's agenda."

Online Nation 2020 research found in April 2020, internet users in the UK spent an average of 4 hours 2 minutes online each day, 37 minutes more each day per online adult compared with January 2020. Emphasising the importance of telecommunications infrastructure in being able to provide internet users with reliable network coverage and capacity to deal with an increasing amount of time online each day.

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, the benefits of enhanced connectivity services can be achieved at this location through the very small height increase to the highest point of the building and is therefore considered to be a wholly appropriate planning 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.

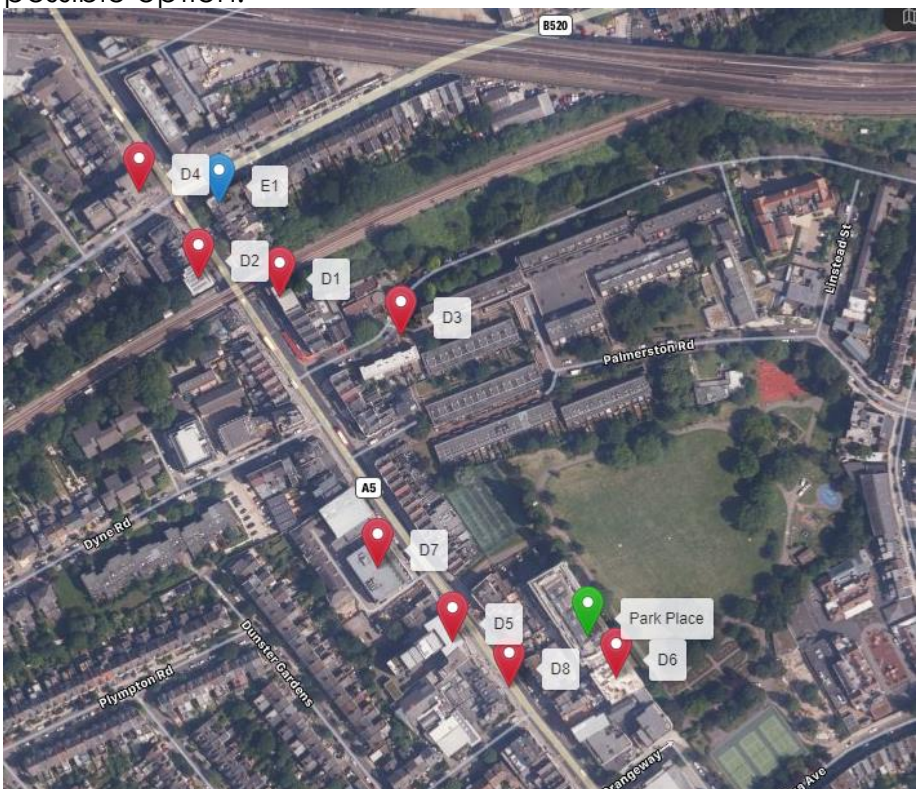
5. Site Selection Process

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 the area was made up of a coverage hole in this part of Kilburn.

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. The application site; Park Place was chosen due to the existing height of the building located in an area which benefits from a lock of local clutter. The building is located within the key coverage area and therefore provides the technical ability to provide the required network coverage to the target area, as such presents the best possible option.

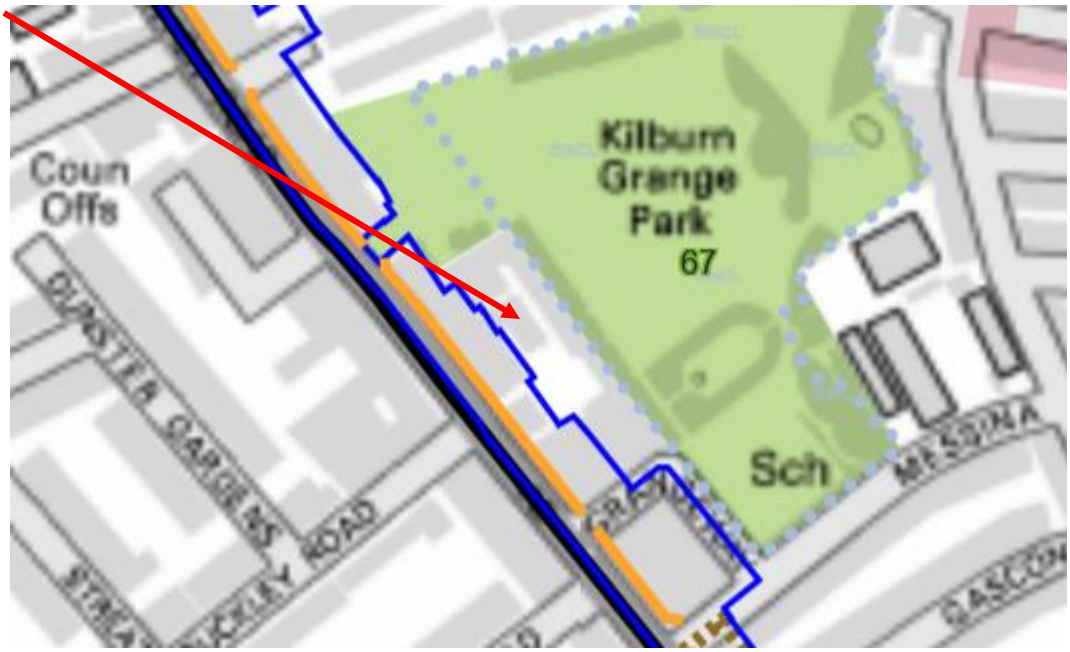


Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
1)Rooftop	Globe House, 328 Hilburn High Road, Hampstead, London, NW6 2QN	524804, 184460	This building is not suitable to accommodate telecommunications equipment due to the rooftop structure.
2)Rooftop	Globe Mansions, 361 Kilburn High Road, London, NW6 7QB	524757, 184469	This building is not suitable to accommodate telecommunications equipment due to the rooftop structure and therefore has been discounted.
3)Rooftop	Webheath House, Netherwood St, NW6 2QR	524875, 184439	Due to the lower height of this building, a site on this option will not be able to propagate the radio signals to the target coverage as effectively compared with the nominated site.
4)Rooftop	Alexander House, 1-3 Netherwood St, London , NW6 2QS	524722, 184518	Due to the lower height of this building, a site on this option will not be able to propagate the radio signals to the target coverage as effectively compared with the nominated site.
5)Rooftop	M P Moran & Sons Ltd, 293-301 Kilburn High Rd, London, NW6 7JR	524863, 184314	Due to the lower height of this building, a site on this option will not be able to propagate the radio signals to the target coverage as effectively compared with the nominated site.
6)Rooftop	Brondesbury Medical Centre, 279 Kilburn High Rd, London NW6 7JQ	524909, 184264	This building is not suitable to accommodate telecommunications equipment due to the rooftop structure.
7)Rooftop	Arthur Murry Dance School, 242, Kilburn High Road, South Hampstead, London Borough of Camden, London, NW6 2BS	525004 , 184245	This option has been discounted as, although it is has similar properties to the nominated site, the nominated site is in a better position in terms of providing the required coverage to the target area.
8)Street Furniture	Street Furniture on Kilburn High Road, 261, Kilburn High	524942, 184239	A 25m street furniture pole would be required at this location to achieve a comparable level of

	Road, West Hampstead, London, London Borough of Camden, Greater London, England, NW6 7JR		coverage provided by the nominated site. Due consideration was had to the potential impact of a 25m mast on the setting of this area. The selected location presents an opportunity to meet coverage requirement without any impact to any open space, and without the need to construct a new ground-based structure, and as such holds greater planning merit.
E1) Rooftop	Existing site Polskie Delikatesy, 336, Kilburn High Road, South Hampstead, London Borough of Camden, London, Greater London, England, NW6 7HY	524768 , 184512	The location of this site is away from the required coverage area, and would not be able to fulfil the network requirement as effectively as the nominated site.

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):



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 conservation areas or planning designations. Kilburn Grange Park located north east of the site is locally listed. Although the equipment may be visible when viewed from the park, it is considered that the public benefits of this proposal will greatly outweigh any visual impact posed. When determining planning applications that affect heritage assets, the National Planning Policy Framework (February 2019) (NPPF) advises that local authorities should take account of:

'*a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality…' (para. 192)

'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.' (para. 196)

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.

It is acknowledged that views of the equipment will be available, however, every effort has been made to minimise the visual impact of the site. The host building has been selected as it is an existing structure and will allow the equipment assimilate into the surroundings without having an harmful visual impact on the surrounding area. It has already been detailed that views of the host building are limited to a relatively small area owing to road layouts and intervening developments 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 2.7 metres above the main roof level, 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.

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 2.7 metres above the main roof level, 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. As

such, the proposal is found to be wholly appropriate and wholly compliant with local and national planning policy.

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.

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, 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".

This singular proposal utilises an existing building which 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".

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).

The London Plan

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

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

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

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

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

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

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

Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing 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 due to the surrounding development. The building is not located within any Conservation Area and the sympathetic design and minimal equipment levels ensures there would be no harm to heritage assets or the surrounding area.

Policy E1- Economic Development necessitates that the council will secure a successful and inclusive economy in Camden by creating conditions for economic growth and harnessing the benefits for local residents and businesses. The proposal would directly support and empower this strategy by increasing the number of rural businesses who would be able to gain or receive improved connection for mobile phone and data connectivity. As previously detailed reliable wireless technology also allows for home working, and the creation of the 'virtual office', thus reducing the need to travel to work. As can be seen by the projected network coverage maps, the proposed installation would see existing coverage for consumers in the area being retained and enhanced. In addition, as mentioned throughout the application, in the current climate, with a dramatic shift towards home-working, online shopping and virtual social gatherings, the importance of connectivity for economic, social and physical wellbeing is more apparent than ever before.

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.

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 new and improve coverage to the surrounding area for Telefonica. 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 directly 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 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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