

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	242-244 Royal College Street	Site Address:	Kentish Town, Camden, London, NW1 9QP
National Grid Reference:	528997, 184550		
Site Ref Number:	CTIL_234260 21	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 20 th August 2020. To date, no response has been received. It was decided to proceed without formal advice straight to a planning application.	

¹ Macro or Micro

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:			
<p>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 20th August 2020 to the Cantelowes Ward Representatives; Councillors Beales, Mason and Singh and the Camden Town with Primrose Hill Neighbouring Ward Representatives; Councillors Callaghan, Cotton and Pietragnoli. A pre-application consultation letter was also sent to the Local Member of Parliament; Keir Starmer on 20th August 2020.</p> <p>On 20th August 2020, pre-application consultation letters were sent to 108 residential properties along Royal College Street, Kentish Town and Castle Road. A full list of consultees was provided to the Local Authority on 20th August 2020. This can be provided again on request.</p>			

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

One resident objection was received and the queries they raised do not pertain to siting or appearance of the proposal. Please see below some points that were raised.

Alternative locations would be more appropriate

The applicant has undertaken considerable time in identifying a suitable site which balances the coverage requirements with a host of other aspects, including the siting and appearance of the installation. Mobile phones base stations do need to be sited close to where people wish to use their mobile phones to ensure good connectivity.

This matter relates directly to the appropriateness of the selected site and so is pertinent to the assessment of a prior approval application. The site selection process and consideration of alternative options is addressed in detail within section 5 of this statement, where it will be demonstrated that a comprehensive search of the area was undertaken, during which a number of alternative locations were considered. None proved to be both technically superior and have greater planning merit than the selected option.

Health concerns

This does not pertain to siting or appearance. Paragraph 116 of the National Planning Policy Framework ("NPPF") is very clear that Local Authorities should not set health guards different to the International Commission Guidelines for public exposure. This is reference to the Independent Commission for Non-Ionising Radiation Protection ("ICNIRP"). Thus, if a development proposal complies with ICNIRP guidelines, health issues should not be considered in the assessment of an application for that development.

A declaration of compliance included within this application.

A factsheet on health and mobile base stations also accompanies the application as supplemental background information for those seeing further guidance on the subject.

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 is Woodentots Montessori School which is located approx. 197m away. Hawley Primary School is located approx. 310m away.

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

A pre-application consultation letter was sent to Woodentots Montessori School on 20th August 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:	1 st February 2021	

3. Proposed Development

The proposed site:

The application site, 242- 244 Royal College Street, is located on the rooftop of a five-storey residential block, located on Royal College Street and east of Kentish Town Road. The site is located just off a local shopping parade within a predominantly residential setting.

The area is predominantly residential in character. Development consists mainly of residential dwellings and blocks of flats. The level and scale of development in this area of London, combined with the road layouts, means that views of the building are not available over long distances.

A previous planning proposal at this location, planning ref: 2018/5961/P, was refused due to being poorly designed and would result in harm to the character and appearance of the property and surrounding area, and fail to preserve or enhance the settings of the nearby listed and locally listed buildings and the adjacent Rochester Conservation Area. The previous proposal was redesigned in order to reduce the visual impact of the antennas. The antennas were reduced in height as far as technically possible to provide adequate network coverage to the area and avoid clipping nearby buildings.

Another application at this location, planning ref: 2020/4919/P, was also refused due to *'The proposed rooftop equipment, by reason of its location, design and scale and height, would result in dominant visual rooftop clutter and cause harm to the character and appearance of the host property, the streetscene and the surrounding Rochester Conservation Area, as well as the setting of nearby locally listed buildings'*. The proposal has been redesigned in order to reduce the perceived visual impact on the surrounding Conservation Area. The antennas have been reduced from 6no. to 3no. antennas behind GRP screening and they are proposed at the main roof level rather than on the existing plant rooms. This is because the antenna height can not be reduced any further and GRP screening is unable to be used on the existing plant rooms, as such the equipment has been split up on the rooftop so that each antenna can benefit from GRP screening.

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 measures 16.7m to the main roof level and 18.5m to the parapet level and the top of the plant room level measures 21.1m. This proposal will lead to an increase in two isolated parts of the rooftop to 21.1 metres in one section and 21.35 metres in the other. The proposed apparatus on the rooftop will be enclosed within GRP shrouding,

thereby ensuring visibility of the proposed apparatus is minimised to the maximum extent, with public views of the installation being filtered.

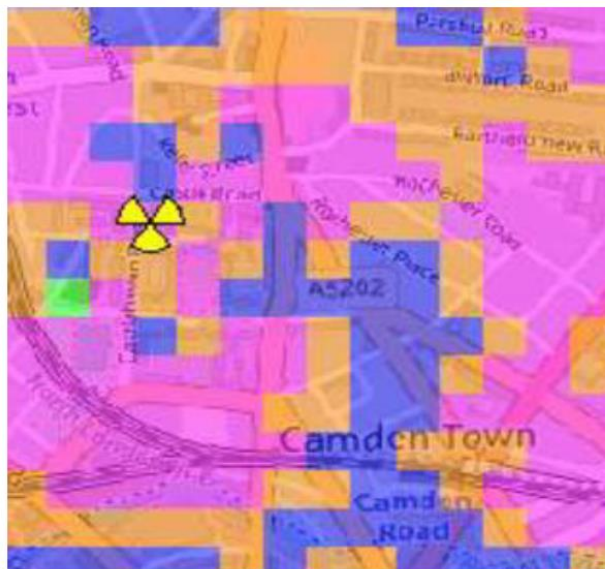
It is considered that the proposal in front of the Council is acceptable, as this height increase in two small areas of the rooftop, will ensure that continuous network coverage for Telefonica will be provided to the surrounding area. This proposal also incorporates a future-proofing element, allowing 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.

The importance of network connectivity has become increasingly apparent during the enforced national lockdown of 2020, where public and business reliance on existing networks has reached an unprecedented level, with a significant proportion of the country's workforce displaced into working from home. As such, the Operators are working hard to meet the surge in demand.

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 Kentish Town, particularly along Royal College Street and the surrounding properties. 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

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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 – Telefonica Coverage with 78707



Coverage by Signal Level

- Indoor Dense Urban
- Indoor Urban
- Indoor Suburban
- In Car
- Outdoor

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

CTiL

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Type of Structure (e.g. tower, mast, etc):	
Description: The proposed development comprises the installation of 1no. 4.4m (21.1m AGL) supporting 1no. antenna enclosed with GRP, 2no. 4.65m (21.35m AGL) supporting 2no. antennas enclosed with GRP, the installation of 2no. cabinets at roof level and 1no. meter cabinet at ground level and ancillary works thereto. 1no. cabinet with dimensions 700mm(w) x 820mm(d) x 1800mm(h) 1no. cabinet with dimensions 750mm(w) x 600mm(d) x 1980mm(h) 1no. meter cabinet at ground level	
Overall Height: 21.35 metres to the top of antennas	
Height of existing building (where applicable):	16.7 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 behind GRP screening which will be painted to match the existing building fabric
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:
<p>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.</p> <p>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.</p> <p>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</p>

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 choice of design at 242- 244 Royal College Street is governed by two main factors; the context and visual amenity of the area; and, the technical requirements. As mentioned previously, another application at this location, planning ref: 2020/4919/P, was refused due to *'The proposed rooftop equipment, by reason of its location, design and scale and height, would result in dominant visual rooftop clutter and cause harm to the character and appearance of the host property, the streetscene and the surrounding Rochester Conservation Area, as well as the setting of nearby locally listed buildings'*. The proposal has been redesigned in order to reduce the perceived visual impact on the surrounding Conservation Area. The antennas have been reduced from 6no. to 3no. antennas behind GRP screening and they are proposed at the main roof level rather than on the existing plant rooms. This is because the antenna height can not be reduced any further and GRP screening is unable to be used on the existing plant rooms, as such the equipment has been split up on the rooftop so that each antenna can benefit from GRP screening, so to minimise any visual impact.

To achieve the required coverage and network improvement for Telefonica 3no. antennas are required. As outlined within the application, the rooftop of 242- 244 Royal College Street is proposed to be utilised, as this rooftop is able to accommodate the level of required equipment will not look incongruous on the existing building as it will only exceed the buildings height by a marginal amount and will be screened by GRP, ensuring that the impact of the proposed development would be kept to an acceptable level.

Given the current situation in which the country finds itself, with a significant percentage of the country's workforce displaced into working from home, demand on the established networks is greater than it has ever been before. The proposed development will ensure existing 3G and 4G coverage is continued, and enhanced, as well as brand-new 5G coverage, and will provide connectivity and network coverage for Telefonica at a time when demand is at its peak, and will continue thereafter.

Antennas will be installed on two sections of the building. This allows the height of the equipment to be kept to a minimum. 3no. antenna apertures are required at this site, in order to provide the required network coverage for Telefonica. These antenna will be spread across the main roof level, enclosed within GRP shrouding. The GRP screening will exceed the height of the existing plant room roof level by 0.53m in one section and 0.25m in the other. GRP screening is proposed to ensure that public views of the majority of the rooftop equipment are obscured. It is therefore considered that the impact of the proposed development has been kept to an acceptable level, as far as practicable.

Radio signals are generated with radio equipment housing cabinets. 3no. cabinets are required to house the equipment at this site. 2no. cabinets will be positioned in a neat linear arrangement to the centre of the rooftop, where views would be limited. The cabinets will be set back from the rooftop edge and so will not be readily visible from

ground level. 1 no. meter cabinet is proposed at ground level, located against the south of the building.

There is very limited scope to alter the design in order to meet the technical requirements required to provide the improved network coverage. Nonetheless, it is considered this proposal is appropriate to the site and its surroundings and avoids any unacceptable level of impact. The application site sits outwith any land designation, but within close proximity to the Rochester Conservation Area and several locally listed buildings. The applicant has taken these designated areas into consideration and wishes to proceed with a reduced level of equipment, plus the deployment of GRP shrouding which will be painted to match the existing building fabric. This will ensure that any impact on the nearby Conservation Area, or any nearby heritage assets, is minimised as far as practicable, whilst also ensuring the technical parameters of the proposal are met and ensuring that the necessary level of mobile coverage is achieved from this location and provided to the local area, businesses, tourists, and residents.

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 Rochester conservation area.

As detailed, all apparatus required will play a vital role in the provision of 2G, 3G, 4G and new 5G services for the 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

	Yes	No
<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)</p> <p>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.</p> <p>When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>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</p> <p>As part of Telefonica's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>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</p>		

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

As stated, 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 the City. 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 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."

It is considered that when the balancing method advocated in the NPPF is applied to the proposal, where the need and significant public benefit of ensuring continuous network coverage is provided, especially given the current global pandemic, is balanced against the appearance and level of associated visual impact of the proposed site, that the application proposal is positively in favour and is considered wholly appropriate.

In May 2019, the decision of the Royal Borough of Kingston-upon-Thames Council to refuse planning permission for the replacement of a 2no flagpole antennas with 3no antennas on the new raised roof level was overturned by the Planning Inspectorate (EE Ltd and H3G UK Ltd Vs the Royal Borough of Kingston-upon-Thames Council, appeal reference APP/Z5630/W/19/3221200). The appeal site, 145-155 Ewell Road, is situated within the Oakhill Conservation Area, and within the setting of locally listed buildings. Despite this, within the decision notice, the Inspector stated that, in reference to the proposed antennas:

"Their visual impact is consequently quite localised to the immediate vicinity of the appeal site, but where they are visible, they are prominent. When seen in this visual context and commercial urban setting and atop a modern building which is itself different from the wider character and appearance of the area, I am satisfied that the antennas would not appear out of place".

"The antennas are located on a building adjacent to and close to locally listed buildings. While the full height of the antennas can be seen alongside these buildings, their position on the roof top of an already contrasting and considerably taller, modern building limits their impact on the setting of these buildings whose visual interest is largely experienced at street level.

I therefore conclude that the development does not harm the character and appearance of the area or the significance of the CA or the settings of locally listed buildings nearby. As such the character, appearance and significance of the CA would be preserved".

In September 2017, the decision of the Council of the London Borough of Camden to refuse planning permission for the installation of 6no antennas behind a GRP screen was overturned by the Planning Inspectorate (CTIL and Telefonica UK Ltd Vs the Council of the London Borough of Camden, appeal reference APP/X5210/W/17/3174680). The appeal site, Troyes House, is situated within the Parkhill and Upper Park Conservation Area. In regard to the GRP screening, the Inspector offered the following comments in their Appeal Decision:

"Whilst the antennae enclosure is functional in its design, it would not be out of character with the bulk, massing and functional design of the plant room/stair overrun. Although GRP is a non-traditional material, the introduction and use of modern materials does not necessarily result in harm to the host building or the CA. I am satisfied that colour coding the GRP screen to match the materials on the plant room/stair overrun would result in the structure visually harmonising with the host building".

Despite the accepted visibility of the proposal, and the impact on the surrounding Conservation Area, the Inspector determined that this impact would not outweigh the public benefits of the proposal, and stated:

"Although I find that the Appeal A proposal would be a visible feature from this limited viewpoint I do not find that it would be unduly harmful to the character and appearance of the surrounding area or the wider CA".

As GRP screening is proposed as part of this application, the above appeal is particularly relevant.

Furthermore, the very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network. Ofcom's 2018 Communications Market Research Report shows that smartphones are owned by four of every five UK consumers and smart TVs are in almost half of all households. Demand for data continues to grow rapidly for UK consumers, with 1.9GB consumed by an average mobile subscription per month in 2017, (up from 1.3 GB the previous year). The report found that more than seven in ten now use their mobile to access the internet.

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

On a wider scale, the proposal would contribute towards the country's connectivity and digital economy future. Mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion. One of the numerous of this, is that this allows for an increase in home working, by providing the opportunity to create a "virtual office", reducing the need to travel for work as a consequence, which is helpful in supporting the sustaining development agenda. 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 no height increase to the building and is therefore considered to be a wholly appropriate planning solution.

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

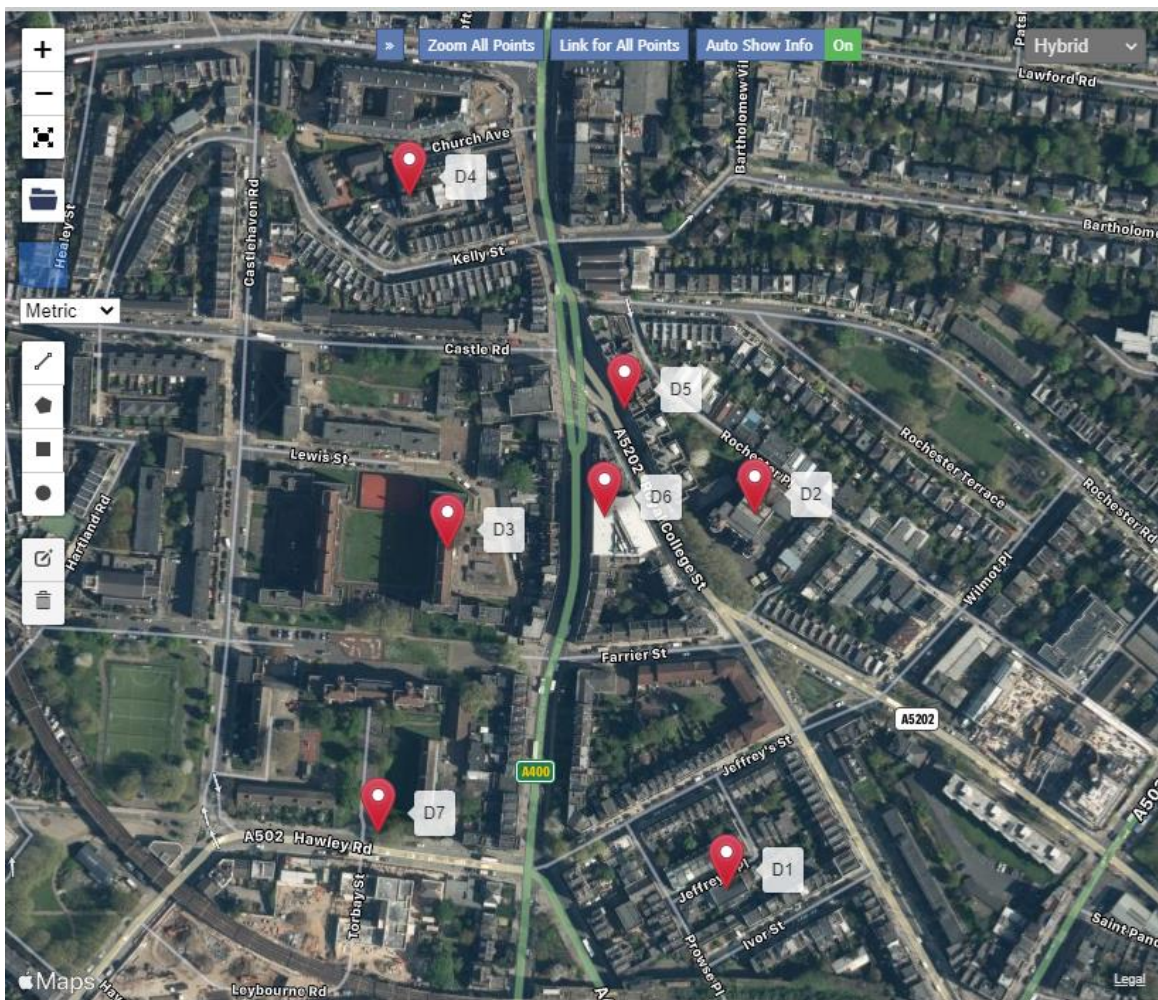
Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the local planning authority in understanding any technical constraints on the location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

5. Site Selection Process

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

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

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



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	7-8 Jeffrey's Place, London NW1 9PP	529057, 184276	This site is in a conservation area and within proximity to listed buildings. Additionally, this site is a lower height than the chosen site which will mean the equipment has to be located on taller support poles, making the equipment more visible from ground level. The selected location presents an opportunity to meet the coverage requirement without adverse impact to the conservation area and as such holds greater planning merit.
2)Rooftop	Chichester Court, Royal College Street, London NW1 9LZ	529067, 184473	The site is in a conservation area. The selected location presents an opportunity to meet the coverage requirement without adverse impact to the conservation area and as such holds greater planning merit.
3)Rooftop	Lorraine Court, Clarence Way, London NW1 8SG	528906, 184450	The building has a pitched roof which makes it unsuitable to install telecoms equipment.
4)Rooftop	Congregational Church Halls, Kelly Street, London NW1 8PH	528882, 184634	There is an existing Three site on this rooftop and there is not enough space on the roof to install Telefonica equipment here.
5)Street Furniture	Pavement outside 242-244 Royal College Street, Kentish Town, London NW1 9QP	528997, 184526	A 17.5m -20m street furniture pole would be required at this location to achieve optimum coverage in this area. It is considered the selected location holds greater planning merit being located on an existing building.
6)Rooftop	Camden Place, 106 Kentish Town Road, London NW1 9PX	528988, 184469	The building has a pitched roof which makes it unsuitable for telecoms equipment.
7)Street Furniture	Street Furniture on Hawley Road, London NW1 8RP	528873, 184301	A 17.5m -20m street furniture pole would be required at this location to achieve optimum coverage in this area. It is considered the

			selected location holds greater planning merit being located on an existing building.
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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.

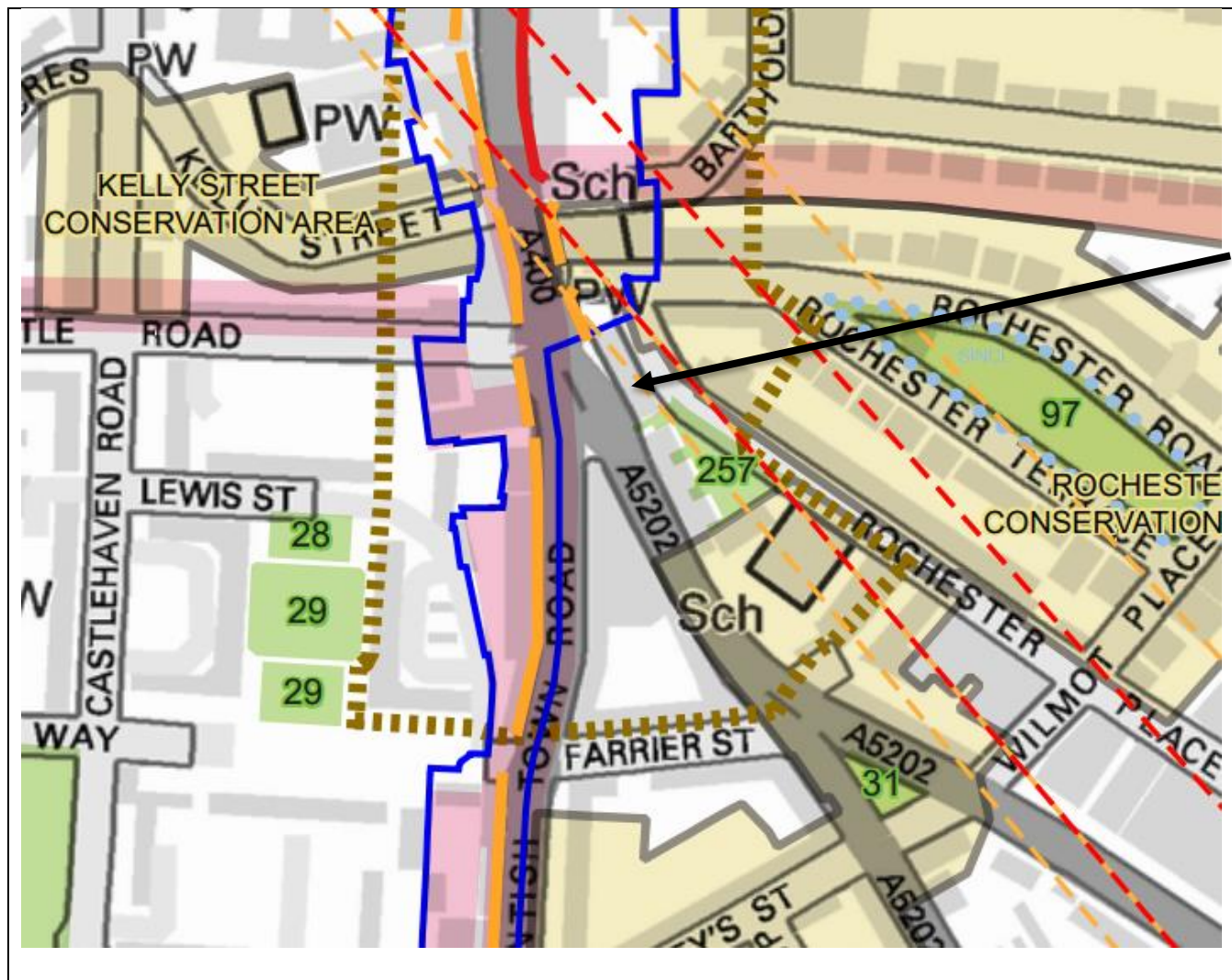
Environmental Information (refer to Section 2 of Site Finder Report):









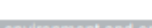









As far as technically possible, the development has been designed to have a minimum impact on the area.

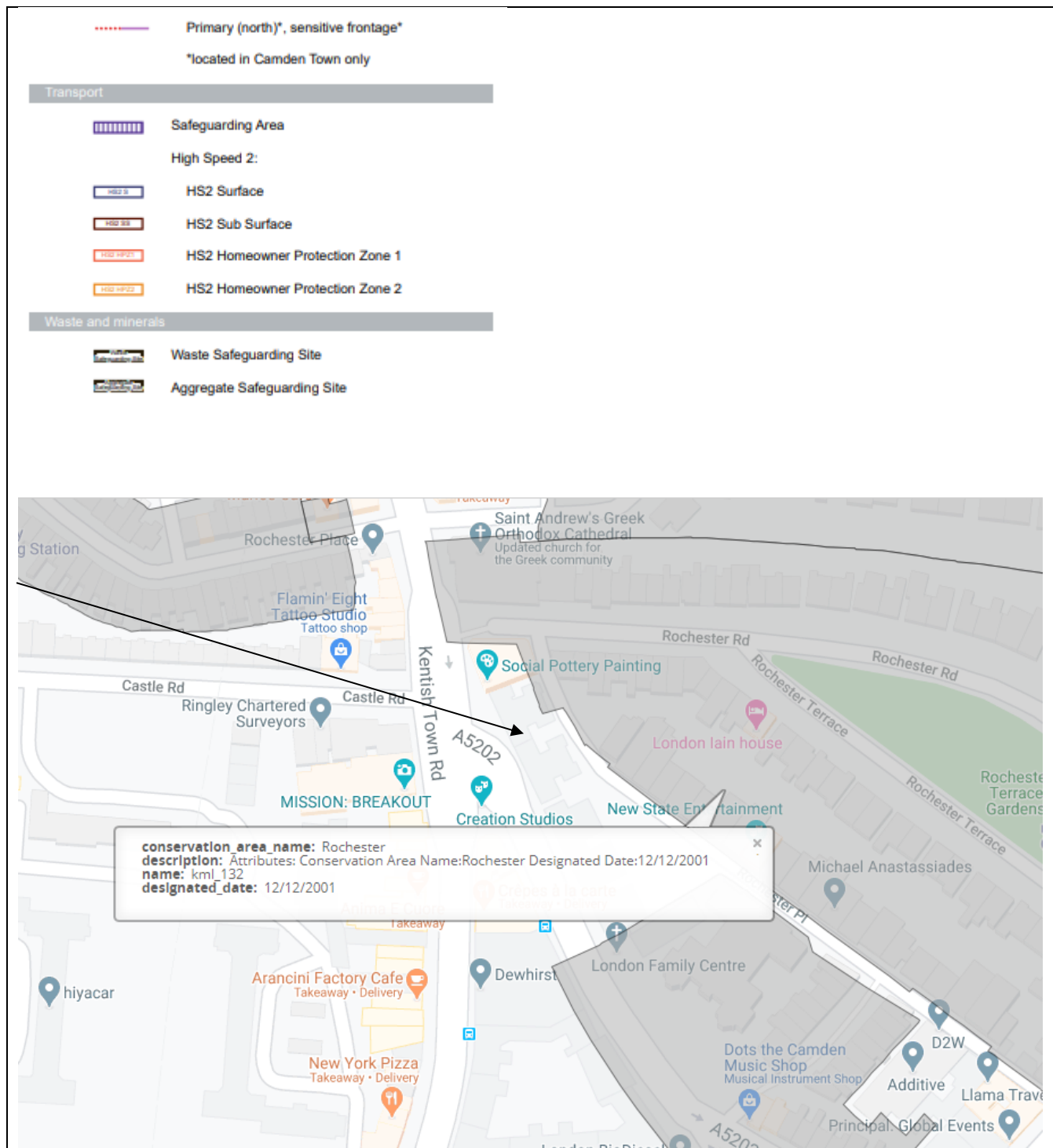
A check of the Environment Agency website has confirmed the site not located within an area which is prone to flooding. There is no evidence of protected species at this location, with the surrounding area consisting of largescale development and buildings. The proposal will subsequently not have any potential negative impacts on any sensitive habitats or species.

As far as practicable the proposed development has been designed to keep to a minimum the impact on amenity and the design of the development ensures there would be only a limited impact which would not be sufficient to harm visual or residential amenity.

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



General	
	Growth Area
	Central London Area
	Site Allocations proposal site (see below for names)
	Fitzrovia Area Action Plan
	Euston Area Plan
	Regent's Park Estate housing renewal and infill
	Euston station and tracks special policy area
	Areas with Neighbourhood Plans approved at referendum (refer to the Neighbourhood Plan at www.camden.gov.uk/neighbourhoodplanning)
Built environment	
	Conservation Area
	Ancient Monument
	Archaeological Priority Area
Designated Views:	
	Viewing Corridor
	Lateral Assessment Area
	Background Assessment Area
Natural environment and open space	
	Open Space
	Metropolitan Open Land
	Site of Special Scientific Interest
	Ancient Woodland
	Metropolitan Walk
	Habitat Corridor, missing link
	Regent's Canal
Sites of Importance for Nature Conservation:	
	Local
	Borough Grade 1
	Borough Grade 2
	Metropolitan
	Local Green Space
Town centres and employment	
	Central London Frontage
	Town Centre
	Neighbourhood Centre
	Industry Area
	Hatton Garden Area
	Protected frontage: primary, secondary
	Primary (north)*, sensitive frontage*



The above map and key is taken from Camden's Proposal Map in Camden's Local Plan (Adopted July 2017) and confirms that the site is not located within any special land use areas or planning designations. The site sits on the border of Rochester Conservation Area. The proposed installation will not significantly hinder this Conservation area as installing telecoms apparatus on a rooftop allows the character of the area to remain the same as the equipment will not be readily visible from ground level. The building is not designated as listed according to Historic England.

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

Siting and Appearance

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

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

As mentioned throughout the application, a previous planning proposal at this location, planning ref: 2018/5961/P, was refused due to being poorly designed and would result in harm to the character and appearance of the property and surrounding area, and fail to preserve or enhance the settings of the nearby listed and locally listed buildings and the adjacent Rochester Conservation Area. The previous proposal was redesigned in order to reduce the visual impact of the antennas. The antennas were reduced in height as far as technically possible to provide adequate network coverage to the area and avoid clipping nearby buildings.

Another application at this location, planning ref: 2020/4919/P, was also refused due to *'The proposed rooftop equipment, by reason of its location, design and scale and height, would result in dominant visual rooftop clutter and cause harm to the character and appearance of the host property, the streetscene and the surrounding Rochester Conservation Area, as well as the setting of nearby locally listed buildings'*. The proposal has been redesigned in order to reduce the perceived visual impact on the surrounding Conservation Area. The antennas have been reduced from 6no. to 3no. antennas behind GRP screening and they are proposed at the main roof level rather than on the existing plant rooms. This is because the antenna height can not be reduced any further and GRP screening is unable to be used on the existing plant rooms, as such the equipment has been split up on the rooftop so that each antenna can benefit from GRP screening.

The antenna apertures have been kept as low in height as possible and will be enclosed within GRP shrouding. This removes the need for a larger and more robust stub tower, which would have a greater visual impact than the design proposed within this application. The height of the antennas will avoid the radio signal being clipped by the roof-edges. The proposed equipment cabinets will be arranged together and neatly at roof level, set back from the rooftop edge, and so will not be readily visible from street level.

For operational reasons, it is imperative that the antennas sit above the rooftop and therefore network signals are not obscured or blocked. In order to negate the impact of the deployment of these antennas, GRP screening will be fixed around the antennas, ensuring no public views of the installation can be achieved. The outcome of this is that, from both medium- and long-range views, it will appear that very small

extensions have been added to the rooftop, rather than telecommunications apparatus. Given the scale of extensions to rooftops in this area, which was discussed previously within this document, the proposal will therefore appear as nothing out of the ordinary, and, over time, will become part of the accepted built environment. Given the significant public benefits, in terms of providing improved 4G and new 5G coverage, and the significant town planning benefits from a visual impact perspective, the design of this rooftop scheme is considered appropriate.

The application site is located in a small undesignated area which sits between the Rochester Conservation Area and Kelly Street Conservation Area. This building has been specifically selected to ensure that it does not sit within a designated area and the proposed scheme has designed to ensure that its prominence on the rooftop has been minimised to the greatest effect. It is, therefore, considered that the proposal will not bring about substantial harm to the character of the area but will bring benefit to the public through retained and improved connectivity and communications services.

The Code of Best Practice on Mobile Network Development in England emphasises that "Existing masts, buildings or other structures should be used unless the need for a new site has been justified", encouraging the use of existing buildings to improve connectivity where possible, such as in this case. In this case, the technical requirement can be met through using an existing rooftop. Therefore, the proposal is in line with this guidance by utilising this rooftop.

While the applicants do not suggest that the proposal will have no impact, it is considered that when applying the balancing method advocated in the NPPF, the proposal finds itself in favour. It is important to keep the impact of telecommunications development in the area to a minimum and it is considered that the proposed development achieves this. When considering the benefits of the proposal, the public benefit from improved connectivity and wireless communication services is a significant one. Not only will this proposal provide improved 3G and 4G network coverage, but the development will provide cutting-edge 5G coverage to this area of London. The applicant considers that any perceived visual impact on the area, or skyline, has been mitigated, as far as practicable, through the best design available within the technical constraints of the site, and that this development will provide excellent public benefits – both in the present, and in the future.

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

This has been emphasised by the Planning Inspectorate on a number of appeal cases where, the planning inspectorate has ruled in favour of proposed developments of a similar nature, where this balance was applied. Some recent examples of where this balance was applied by the Planning Inspectorate include appeal cases referenced

APP/Q3305/W/18/3206555 and APP/L1765/W/18/3197522. Extracts from these appeal decisions are included below for your convenience:

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

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

"9. The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "Advanced, high-quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections... The Council has commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision."

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

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

The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding harm to the host building and the surrounding area. The antenna apertures will not be visible; as their impact will be reduced by the proposed GRP shrouding, thereby reducing any perceived visual impact on the host building, the adjacent Conservation Areas, or any nearby heritage assets. The impact of the rooftop scheme has been mitigated as far as practicable by the proposed design – with height increases isolated to two areas of the rooftop, rather than the introduction of one larger installation (in the form of a stub mast) creating a greater visual impact. As well as reducing the amount of equipment significantly from 6no. antennas to 3no. antennas so to minimise visual impact further.

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the less than substantial harm it 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".

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 Covent fibre broadband connections". Again, the proposal is entirely consistent with the aims expressed within the NPPF.

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

It is confirmed that there is no opportunity to utilise an existing telecommunications site to meet the technical requirement in this instance. The proposal does seek to utilise a building to meet that need, in direct compliance with paragraph 113.

It should be noted that paragraph 116 states that *"Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International*

Commission guidelines for public exposure". Compliance with these guidelines (ICNIRP) is confirmed and a declaration of such is included with the application.

It is stated in Section 4 of this statement that the Planning Inspectorate has in recent years continually recognised the importance of connectivity. When applying the balancing exercise encouraged at paragraph 196 of the NPPF, the Inspectorate has found in multiple cases that the provision of network services can outweigh less than substantial harm to heritage assets.

In determining one such appeal, brought operator Telefónica (O2) against the decision of the London Borough of Harrow to refuse Prior Approval for the installation of a 12.5 metre high monopole with shrouded antenna section and accompanied by an equipment cabinet on a roadside verge in the urban area of Harrow-on-the-Hill (appeal reference APP/M5450/W/17/3180345, determined in December 2017), the Inspector concluded that:

"The proposal would be permitted development and provide public benefits in extending the telecommunications capacity of the area. In applying the balancing test of paragraph 134 of the Framework, I consider that these benefits outweigh the harm that would arise from the proposal's impact on the character and appearance of the Conservation Area".

These findings were echoed by the Inspectorate in determining a further case brought by the same Appellants against the decision of the London Borough of Hillingdon to refuse planning permission for a 15 metre high monopole with shrouded antenna section and associated equipment housing at a roadside location within the urban area of West Drayton (APP/R5510/W/16/3143922, 2016).

The Inspector concluded:

"The Framework sets out the importance of an advanced high-quality communications infrastructure for sustainable growth and makes specific reference to the development of high-speed broadband technology. This is reflected in the London Plan and the public benefit arising from the improvement of the telecommunications infrastructure is a material planning consideration that weighs in favour of the proposal.

Taking account of all matters I have concluded that the limited harm caused to the significance of the heritage asset (the CA) would be outweighed by the public benefit that would arise from improving the communications infrastructure".

In both cases cited the developments were new base station installations proposed within Conservation Areas and it was determined that they would give rise to a degree of harm to the heritage asset in question. Despite this, the importance of providing a quality communications infrastructure was recognised by the Inspectorate and awarded due weight in the determination of the cases brought. That weight was sufficient for both appeals to be successful, despite the recognised harm. In the case of this application, the same public benefit occurs, and it is considered that any harm to the adjacent designated areas (Rochester

Conservation Area and Kelly Street Conservation Area) is less than significant and should therefore receive Officer support.

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 need to respect and protect the historic environment is recognised by the proposed development, hence the inclusion of GRP screening in the revised development, as well as the removal of 3no. antennas to reduce the overall amount of equipment proposed. As outlined within the application, the proposed development has been minimised as far as practicable, in terms of size and scale, to ensure that the impact that may occur can be balanced by the positive public benefits brought forward. The applicants note a requirement for development to make a positive contribution to the local character of an area and it is considered that the continuation and enhancement of established mobile network services within the area would indeed contribute to the character of the area. The applicants consider that the level of harm associated with the revised proposal to the Rochester Conservation Area is minimal and is outweighed by social, economic and environmental benefits.

The siting and design of the proposed development has been addressed within the planning application. Additionally, as the design has been revised from that which was proposed previously, it is considered that all steps have been taken to minimise the visual impact of the proposal, with innovative design used – by way of GRP screening – and technical solutions maximised – by way of the removal of the amount of antennas.

It is considered that the impact of the development would not be unacceptable and would be balanced by the benefits brought to the area, which directly and positively influence character.

The proposal will be sited on the roof of a building and therefore this will not hinder the character or amenity of the surrounding conservation area. The principle of introducing rooftop telecommunications apparatus to this site and wider environment is considered far more appropriate than the installation of new, ground-based equipment in the form of a telecommunications monopole, which would undoubtedly have a greater impact to the Rochester Conservation 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 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 there is no conflict identified with any other Development Plan policies.

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

Summary

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


This application involves the installation of a new telecommunication site to provide enhanced and increased capacity and allowing for new 5G provision for the Telefonica mobile network. The comments of the Council in relation to the previous

application at this site (Ref: 2020/4919/P) have been taken into consideration and addressed with a more innovative design and a reduction in proposed equipment. As the Council's previous comments referred directly to the deployment of the proposed telecommunications apparatus, and the visual impact that it may have, the intention is to now screen the proposed apparatus with GRP screening. Consequently, it is considered that this proposal offers a far better and appropriate design than the previous proposal, which will nullify any perceived impacts on the Conservation Area, or the setting of nearby Listed Buildings. It is considered the proposal complies with both national and local policy. It is of significance that the development ensures a continued provision of local community facilities and services. The significant network benefits this proposal will bring to the immediate surroundings, as well as the neighbouring sites, are considered to greatly outweigh the minor visual impact of the site to the building and area.

The proposal is fully compliant with ICNIRP guidelines.

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

Confirmation that submitted drawings have been checked for accuracy

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		(on behalf of Cornerstone and above operator)	