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Our Ref: 66366/CMN185/ATAP/MP

Chief Planning Officer
Camden Borough Council
Camden Reception
5 Pancras Square
London
N1C 4AG

Submitted via Planning Portal

Dear Sir or Madam,

PLANNING APPLICATION FOR TELECOMMUNICATIONS UPGRADE AT 1-24 RIVERSIDE, BIRKENHEAD STREET, BLOOMBSURY, CAMDEN, LONDON, WN1H 8BH

(NGR: E 530400 / N 182876) (SITE REF: 66366/CMN185)

Avison Young are planning consultants acting on behalf of Mobile Broadband Network Limited (MBNL), which is a joint venture co-owned by EE Limited and H3G UK Limited, to submit the application contained herein for the upgrade of an existing telecommunications base station as proposed below.

Description of Development:

Removal of 6no existing antennas and 5no equipment cabinets to be replaced with 10no new antennas and 5no new cabinets, installation of 1no new meter cabinet at ground level and associated ancillary works thereto.

Enclosed you will find an application prepared on behalf of EE Limited and H3G UK Limited who are licensed operators that provide Cellular Network based upon the Global System for Mobile (GSM) standard and Universal Mobile Telecommunications System (UMTS) within the United Kingdom.

The supporting documents submitted with this application are as follows:

- Application Form (as generated through Planning Portal)
- Drawings 66366_1-24 RIVERSIDE_002, 100, 150, 215, 265_H
  - Subsequent drawing revision 66366_Rev I pages 215, 265, 266, 267, 268
- Planning Statement (Design and Access Statement)
- ICNIRP Certificate
- 5G and Future Technology
- Connected Growth Manual – Digital Infrastructure
- IET Guide to 5G

The application fee of £462 will be paid via the Planning Portal.

We trust you will find the enclosed information sufficient to register and validate the application. Should you require any further information, please contact me on the below details.

Yours sincerely,

Mandy Poon
Assistant Planner
Telecoms
Mandy.Poon@avisonyoung.com

Avison Young
For and on behalf of Mobile Broadband Network Limited

DESIGN AND ACCESS STATEMENT

The following design and access statement is enclosed in support of this proposal and demonstrates the general development principles that have been adopted in the final detailed design of this proposal.

1. HISTORY & BACKGROUND

Everything Everywhere Limited is a 50-50 joint venture between Deutsche Telekom and France Télécom and was formed in 2010 through the merger of their respective T-Mobile (UK) and Orange U.K. businesses. On 3 September 2010, Everything Everywhere announced that Orange would join Mobile Broadband Network Ltd (MBNL), the joint venture management company formed in December 2007 between T-Mobile UK Ltd and Hutchison 3G UK Ltd (H3G UK). In 2016, Everything Everywhere was chosen to work in conjunction with the Home Office to deliver the Emergency Services Network (ESN), which will deliver a smarter, better and cheaper communications capability.

The proposed upgrade subject to this application is part of the operators' continuous efforts to improve the existing 3G and 4G network across the country, in addition to introducing 5G technology to cater for current and future customer demands. It is evident that mobile phone usage has grown exponentially over recent years as more than 90% of the population now own a mobile phone. Customers expect to be able to use their mobile phones and tablets in all locations as these devices have become intrinsic to our personal and professional lives. UK operators are continuously trying to improve their network infrastructure in order to adapt to the changing environment and keep up with customer demands. With constant advancements in radio technology, it is therefore a natural consequence for base stations to be upgraded to accommodate newer versions of radio equipment. As part of EE and H3G's ongoing network programme, there is a requirement for infrastructure improvements in this area of Camden and the surrounding local community. The proposed upgrade works will allow for better coverage and increased capacity to satisfy the traffic demands set by mobile users passing through this region, and will also help towards futureproofing the network to reduce the frequency of works required at the site.

Site Selection
The applicant has adopted a sequential approach to site selection which is encouraged in the Code of Best Practice for Mobile Operators and the NPPF. Efforts have been made to utilise existing telecommunications sites wherever possible to prevent the proliferation of base stations. In this instance there was a suitable existing base station in the search area that could be upgraded to accommodate the required technologies for the operator's needs. As a result, it was not required to identify alternative site options.

2. CONSULTATION

Pre-application consultation letters were issued on 17th May 2021 to the Local Planning Authority as well as local Ward Councillors, local MP and Argyle Primary School. The applicant was informed that there would be a fee for the pre-application advice service. Upon reflection it was considered that the proposal would be formally submitted due to the works being of minimal development and the site being an accepted and established telecommunications base station. To date no responses have been received from other consulted parties.

3. DESIGN

3.1 THE PROPOSAL

The application site is located at 1-24 Riverside which is a student hall of residence on Birkenhead Street near St Chad's Street. A number of similar sized buildings are situated in the surrounding area

which comprises a mixture of land uses including residential dwellings and commercially used properties. Due to the site's proximity to Kings Cross and St Pancras train stations the wider area as a whole presents an urban setting that experiences extremely high levels of footfall throughout the day.

The host building is an existing base station which is an established feature of this streetscape that serves as an important cell within the wider mobile network due to the high density of users in this urban environment. The site is located on or within direct proximity to a listed building however Riverside is within the Kings Cross/St Pancras Conservation Area.

The description of development seeks to upgrade the existing site which comprises the removal of 6no existing antennas and 5no equipment cabinets to be replaced with 10no new antennas and 5no new cabinet with 1no additional meter cabinet at ground level and associated ancillary works thereto. As the site is situated within designated Article 2(3) land an application for Full Planning permission is therefore submitted herein.

Site Photo	
	
Type of Structure (e.g. tower, mast, etc)	Antenna support poles
Overall Height	26.05 metres
Height of Existing Building (if applicable)	21.95 metres
Equipment Housing	
Unilateral cabinets (x3)	600x 600x2200mm (WxDxH)
PSU cabinet	600x 600x2200mm (WxDxH)
Mk 5 Link/AC cabinet	1200 x 500 x 1500mm (WxDxH)
Materials (as applicable)	
Tower/mast etc – type of material and external colour	Galvanised Steel – manufactured grey RAL 7035
Equipment housing – type of material and external colour	Galvanised Steel – manufactured grey RAL 7035
Frequency	GSM 1865.5-1846.5 MHz
Modulation Characteristics[1]	GMSK & UMTS
Power Output (expressed in EIRP in dBW per carrier)	56 dBm
Height of Antenna (m above ground level)	23.7, 24.95 & 25.5 metres to centre of antennas

[1] The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase Modulation. The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation.

Heritage Statement

Kings Cross/St Pancras Conservation Area

The character and appearance of an area depends on a variety of factors. Whilst the appearance of an area derives from its physical and visual characteristics (i.e. materials, heights of buildings, types and relationship of built form), character includes other less tangible effects relating to the experience of an area. This may include levels and types of activity and patterns of prevailing land uses. The character of an area may also vary according to the season, day of the week or time of day.

Whilst parts of the King's Cross Conservation Area are dominated by the stations and the area's function as a gateway to Central London, there is great variety in the character and appearance of the area as a whole. Whilst the stations are major landmarks in the urban fabric of London and major centres of public transport interchange, the streets to the south of Euston Road and to the north and west of St Pancras Garden are more characteristic of the general grain and land uses beyond the Conservation Area boundary and are largely unrelated to the stations.

Sub Area Gray¡s Inn Road - This sub area comprises the area bounded by Pentonville Road and King's Cross Road to the north and east, Swinton Street to the south and the Birkenhead Street Estate to the west. King's Cross Road and Gray's Inn Road are principal roads linking King's Cross to the City of London. These roads are lined with a mix of early 19th century terraces and larger scale institutional buildings. The area between the main roads contains narrow streets paved in granite setts, predominantly lined with later 19th century buildings of former light-industrial and commercial uses, as well as housing, and several vacant sites currently used for car parking. These streets are bisected by the London Underground Metropolitan Line and Thameslink railway cutting, and, despite piecemeal re-development, have a characteristic fine urban grain with broad consistency of building heights and materials. The blocks of the 1950s Birkenhead Street Estate are located against the west boundary of the Conservation Area.

3.2 DESIGN CONSIDERATIONS - SITING AND APPEARANCE

The applicant has sought to cause as little impact on the visual amenity of the area as possible whilst also ensuring that sufficient coverage requirements are achieved. A further explanation of the application¹s technical justification is explained in a later section of this statement however, it should be acknowledged from the offset that the proposed 10no antennas are technically necessary in order to create the power and capacity that the 5G frequency demands. Moreover, the proposed height of the antennas is the lowest possible height to ensure correct signal conveyance whereby a reduction in height may impact on the site¹s functionality as well as health and safety in relation to ICNIRP compliance. The operator¹s general practice will always endeavour to propose the minimum height and least amount of equipment necessary to sufficiently achieve the desired coverage levels and it should be recognised that any reduction in height or equipment would compromise the site¹s effectiveness within the network. There are no alternative design solutions available with the required technologies meaning the proposed scheme is the least visually intrusive design for the site¹s upgrade.

Whilst it is not necessary to outline alternative locations as the proposal seeks to utilise an existing base station, it should be noted that if an upgrade cannot be progressed at this location, a new base station within proximity to this site would be required to satisfy coverage objectives. The existing base station was deemed acceptable in its inception meaning that no concerns were raised in relation to its proximity to the surrounding character and associated sensitive assets. Though it is recognised that changes to a telecommunications site will to a degree be recognisable in any given environment, the visibility of equipment does not automatically lead to detrimental harm as each site must be assessed on its own merits and balanced against the public benefits to be provided in accordance with Paragraph 196 (NPPF). In this respect significant weight should be given to improving existing 4G coverage and introducing 5G technologies in recognition of the government¹s support for this form of development. The application site is an established feature of this urban street scene where telecommunications equipment is commonly found which sets precedence at this location.

To minimise the change in visual appearance the existing apparatus has been utilised as much as possible and in this instance new support structures were required to accommodate the new technologies. This design layout strikes a balance between the sites technical requirements and visual amenity aspects whereby existing antenna positions will largely be maintained to aid the upgrades assimilation into the roofscape. It should be noted that the proposed development is the lowest technically possible in terms of scale, bulk and height. The proposed antennas will remain grouped together on the eastern end of the building which will facilitate the removal of redundant support structures, thus ensuring the level of steelwork is kept to an absolute minimum and there is no net gain. The resulting change in appearance will be less prominent compared to the current context which allows visual amenity to be largely maintained.

An initial drawing revision sought to propose some of the antennas in a stacked formation resulting in a total of 6no individual apertures that was considered to be somewhat comparable to the existing site where 6no existing antennas can be clearly identified. Following further discussions with the local planning authority in which concerns were raised due to the proposed overall height, a revised design was sought to re-arrange the antennas in a side-by-side formation. This design is subject to the amended Revision I plans which have been submitted to the Council and illustrates an overall height reduction of more than 2 metres, thus improving the vertical emphasis of the proposed development.

These vertical features are slim in profile, which bear resemblance to the existing base station and are thus capable of being absorbed into the roofscape. This in turn reduces the extent of visual prominence that will aid the sites assimilation into the surrounding environment as the overall change in appearance is thought to be minimal. The overall height of the apparatus will require a relatively small increase as a result which is necessary to ensure ICNIRP compliance and correct signal conveyance towards the large target area. Taken as a whole, the antennas will be read within the same air space across the skyline and compared to the existing site at present the cumulative effects of the proposed equipment is minimal. Consequently, it is thought that visual amenity is not detrimentally impacted by this upgrade scheme but would in fact be maintained as a result of the minor development works. Although the base station is more discernible at a localised level, the simplistic design of the upgrade scheme will mimic a similar visual appearance to the current situation. As a result the applicant considers the proposal to be acceptable in regards to its siting and appearance.

Following on from this, it is recognised that the equipment can be read at height from wider vantage points however the setting of this application site upon a modern building within an area that is urban in character should be taken into consideration in the assessment of this application. Additional regard should also be given to the natural eye line of local residents and passers-by as the equipment is located on a rooftop in which visibility would necessitate a bystander to purposefully look upwards. The applicant believes such views would be uncommon and irregular which in turn reduces the risk of visual prominence. As mentioned previously the proposed works will offer a minimal visual change to the existing base station which is not thought to be overly prominent from a greater distance.

Given that 1-24 Riverside is approximately 21.95 metres in height; the visibility of the base station at ground level is partially restricted to oblique views for local residents and passers-by, especially when considering the narrow nature of the neighbouring public highways which increases the unnatural angle. This is demonstrated in the below image taken from St Chads Street where the site is visible provided the viewer faces upwards towards the skyline. Moreover, it is also argued that 1-24 Riverside presents a modern appearance that, to a certain extent, allows a slight separation from the adjacent buildings which are characteristically more historical in appearance within the wider Conservation Area. This noticeable distinction allows the site to be viewed within an isolated context that does not cause detrimental impact on the visual amenity of the surrounding area due to its concentration on one single modern-looking building.

In addition to this, there are several screening elements along the neighbouring road networks which will further reduce these views including buildings and street items such as trees and lighting columns that offer a similar vertical emphasis against the skyline. For passing traffic, these built features will reduce the site's visibility resulting in momentary and infrequent viewpoints only. Vantage points around the application site show that the existing equipment can be seen but is relatively small in profile due to the distance, the tower's height above ground level and the size comparison with the tower itself. These viewpoints also show the congruent nature of telecommunications equipment against the British skyline which prevents any potential impact from wider vantage points. These images illustrate the existing equipment's congruous nature across the skyline from these distant viewpoints meaning its overall prominence is negligible to passing pedestrians and motorists. This is especially prevalent when taking views from the larger public highways where the application site is hidden behind existing built infrastructure. The inconspicuous nature of the current base station is a transferable point that should be applied to the assessment of this application given the minimal alterations proposed. These arguments should therefore be materially considered in the determination of this submission.

Following on from this, the proposal is not considered to adversely impact residential amenity despite the proximity of dwellings in the local area. The equipment is situated on the rooftop away from residential windows and other public and private spaces meaning there is no direct influence on the natural enjoyment of daylight, outlook or privacy for the local community. Additionally, it should also be reiterated that that the application site accommodates an existing base station which sets precedence for telecommunications equipment at this location and is also befitting of the surrounding urban environment. It is also inherently common for telecommunications equipment to be situated on tall buildings which is especially widespread in Greater London boroughs and big cities. In this respect the

close proximity of major transport hubs in Kings Cross and St Pancras train stations elevate the importance of this base station within the wider mobile network. As well as this, the applicants decision to upgrade an existing site as opposed to identifying a new location is in accordance with planning guidance so as to prevent undue harm to visual amenity and proliferation.

Furthermore, in relation to sensitive heritage assets it is acknowledged that the application site is situated within the Kings Cross/St Pancras Conservation Area, however there are notably no statutory listed buildings within direct proximity. The applicant recognises the sensitive importance of this designation which has influenced the design considerations of this proposal whilst ensuring technical objectives can be met. The presence of telecommunications equipment within protected land can lead to some degree of impact however the extent of harm must be judged on balance with the sites inherent nature as a utility provider, in which its proximity to such an asset is sometimes an unavoidable circumstance in order for the public to have access to high quality coverage.

In this instance it is noteworthy that 1-24 Riverside accommodates an existing base station that is well-established within the local area and the scheme therefore accords with planning legislation that encourages the use of existing sites as opposed to new installations. The building itself is modern in appearance and is not recognised for its architectural merit. Given the minor alterations proposed, whereby the combined scale, height and bulk has been kept to an absolute minimum, the applicant does not consider the proposal to have a detrimental impact on this designation that would substantially outweigh the public benefits of the application. In this respect additional consideration should be given to the populous nature of the local area that experiences extremely high levels of traffic, including those in transit through Kings Cross and St Pancras train stations, which inevitably require high speed mobile connectivity in order to fulfil current and future demands. The surrounding area therefore presents an urbanised setting in which telecommunications infrastructure is befitting and integral to the fabric of thriving social and economic communities.

In summary the proposed design is considered to be respectful of the surrounding elements and does not cause detrimental harm to the visual amenity of the immediate environment. The siting and appearance of this proposal is therefore within the boundaries of acceptability as it will cause minimal interruption to the current landscape and is in line with the NPPF of utilising existing sites and buildings. When taking into account the existing precedence for telecommunications equipment, the proposed upgrade displays a level of consistency with the current site which results in a similar extent of visual impact as the equipment presently in situ. Therefore, the applicant strongly believes the scheme demonstrates a sympathetic design that would not detract from the architectural merit of the surrounding conservation area and the proposed works are capable of being absorbed into the wider landscape.

Overall it is considered that the scheme does not demonstrate substantial harm to the local area and surrounding heritage assets, and in any event, it is argued that the public benefits of the proposal would outweigh any perceived harm. As the scheme seeks to introduce 5G technologies during a climate where economic recovery is paramount, the public benefits associated with this upgrade cannot be undervalued.

4. PLANNING POLICY CONSIDERATIONS

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that Local Planning Authorities should determine proposals in accordance with development plan policies, unless material considerations indicate otherwise. Material considerations may include, inter alia, central government guidance, High Court and Inspectors decisions etc.

4.1 LOCAL PLANNING POLICY

The following local planning policies are relative and have been considered in the submission of this application. It is argued that the proposal is in accordance with the below policies which promote high-

quality connectivity and supports new telecommunications infrastructure when it can be demonstrated that the design and siting of the base station is respectful to its surroundings.

Camden Local Plan (2017)

Policy G1 Delivery and Location of Growth
In line with this policy, the Council is committed to delivering high quality development within the Borough. The proposed development has been designed with respect to the surrounding area, amenity and sympathy to any nearby heritage assets. The utilisation of an existing base station demonstrates an efficient use of land that is supported by this policy.

Policy E1 Economic Development
With reference to this policy, the application seeks to improve existing mobile coverage in this area of Camden in which there are important public benefits which improve economic development. The Council are committed to improve the conditions for growth for local residents and businesses in which digital connectivity is an important element that has an increasing impact on business operations. Within the current climate the improved quality and speed of communications will support local businesses catering for current and future demands.

Policy A1 Managing the Impact of Development
The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.

Policy D1 Design
The Council will seek to secure high quality design in development... The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under Policy G1 Delivery and location of growth will be provided through high quality contextual design.

In accordance with policies A1 and D1, the application is of a high quality design that has been carefully considered in respect to the existing setting and character of the surrounding area to protect visual and residential amenity. As standard practice the operator will take into account the local context and historic environment in the consideration process for design. These steps ensure there is minimal impact caused to any given area which has been demonstrated in this instance for this proposal. As noted earlier in the statement there is little demonstrable harm caused to nearby residents as well as any important heritage assets.

Policy D2 Heritage
In recognition of the site's proximity to notable heritage assets the applicant has carefully considered the design of this proposal to ensure there is no substantial loss to the character and setting of the surrounding area. As explained previously in this statement the extent of public benefits to be provided should be weighed against the potential impacts which are demonstrably minimal when compared to the existing site at present which is an established base station. Both the siting and design of the proposed development bear a comparable resemblance to existing equipment which lessens its potential for undue harm towards the wider conservation area.

In proportion with the significance of the host building the site has been kept to a technical minimum that does not demonstrate detrimental impact on any nearby statutory listed buildings or other notable buildings recognised for their architectural merit. Consequently the applicant considers the proposal to accord with the principles of this policy.

Camden Planning Guidance - Digital Infrastructure (March 2018)
The councils supporting guidance on telecommunications equipment encourages the expansion of electronic communications networks in accordance with the NPPF. The Council commits to keep the number of telecommunications masts to a minimum consistent with the efficient operation of the network. Reference should also be made to guidelines stipulated in the Code of Best Practice and should be evidenced in applications submitted to the Council. The use of existing masts and buildings is

highly encouraged and where new sites are required, the equipment should be sympathetically designed to disguise the site as much as possible. This has been demonstrated in the application submitted herein.

4.2 NATIONAL PLANNING POLICY

This legislation was formally adopted in July 2018 and replaces the previous version which was introduced in 2012.

In relation to this policy the following sections are relevant in determining this application:

Section 2 – Achieving Sustainable Development
Paragraph 7 – *"The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs."*

The NPPF also encourages the achievement of sustainable development which can provide public benefits to building stronger and more competitive economic areas, as well as enhancing social communities through increased communication and connectivity.

Section 4 – Decision-Making
Paragraph 38 – *"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. Decision-makers at every level should seek to approve applications for sustainable development where possible."*

Section 6 – Building a strong, competitive economy
Paragraph 80 – *"significant weight should be placed on the need to support economic growth and productivity... this is particularly important where Britain can be a global leader in driving innovation."*

Section 10 – Supporting high quality communications
Paragraph 112 – *"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."*

In relation to these paragraphs, the Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, and sets out a delivery programme to make the UK a leader in *"artificial intelligence and big data"*. The improvement of telecommunications capacity and provision of 5G is imperative to allow for areas to be connected, and is essential for economic growth.

Paragraph 113 – *"The number of radio and electronic communications masts, and the sites for such installation, 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... Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate."*

In relation to this paragraph, it is demonstrated that a sequential approach to site selection has been adopted to ensure that existing telecommunications installations have been explored in the first instance to prevent the proliferation of masts. A suitable existing base station was identified in this instance.

Paragraph 114 – *"Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of*

electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:

a) *They have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*
b) *They have considered the possibility of the construction of new buildings or other structure interfering with broadcast and electronic communications services."*

Paragraph 115 - "*Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:*

a) *The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and*
b) *For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or*
c) *For a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met."*

In relation to this paragraph, the site is not located within 3km of a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area. Nearby schools and nurseries in close proximity have been consulted. The local planning authority was consulted with regards to the proposed upgrade scheme. An ICNIRP certificate is provided with this application to confirm that the proposal will not exceed International Commission guidelines. As the scheme is utilising an existing base station, it was not necessary to identify alternative site options.

Section 12 – Achieving well-designed places
Paragraph 124 - "*Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.*"

In relation to this paragraph, the application seeks to upgrade an existing telecommunications site located on 1-24 Riverside and the proposed equipment is the least amount possible to allow the site to transmit sufficiently; we therefore consider this design to be respectful to the character of the area. Although the site's change in appearance will to an extent be recognisable features of this street scene, efforts have been made to limit the visual impact on the surrounding amenity.

Section 16 – Conserving and enhancing the historic environment
Paragraph 189 - "*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.*"

In relation to this paragraph, the relevant historic environment records are referred to within this document within the Heritage statement (section 1.3.1), and the impact of the proposal on these historical assets are explained in section 1.3.2.

Paragraph 196 - "*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.*"

It is considered that the proposal is in accordance with this paragraph as the application seeks to upgrade an existing telecommunications base station. The upgrade has been designed sensitively to be respectful of these recognised heritage assets.

To conclude, the applicant therefore considers the proposal to be in accordance with local and national planning policies.

4.3 LONDON PLAN 2021

The Plan recognises the strategic importance of providing necessary infrastructure, including modern communications networks that London requires to secure its long-term economic growth. The proposed works will improve digital connectivity to the benefit of Londoners and businesses. The site will ensure a high level of connectivity is sufficient to meet the rising demands of reliable data and services of the public as well as safeguarding the reduction of coverage within the surrounding area. This application is therefore an integral element in securing the Mayor's vision for the delivery of modern communications networks across London.

With particular reference to Policy SI 6 (Digital Connectivity Infrastructure), the applicant is committed to fulfilling network obligations to cater current and future demands to ensure high quality coverage is provided which continues to be faster and stronger. In line with this policy the applicant has also demonstrated efforts to utilise existing base stations, rooftops or other structures prior to identifying new locations to fulfil network objectives. Ongoing network upgrades are an essential aspect of London's global competitiveness which is recognised in the latest Plan.

5. TECHNICAL JUSTIFICATION

In the assessment of this application, material weight should be given to the public benefits that will be provided to local residents and visitors in this area. The site will form part of an improved coverage network which will also introduce 5G technology to allow for faster download speeds and better signal. More information on 5G can be found in the accompanying documents: *5G and Future Technology*, *Connected Growth Manual Digital Infrastructure* and The Institution of Engineering and Technology's *Guide for Local Planning Authorities Regarding 5G Masts and Small Cells*.

The demand and focus on delivering the 5th generation of mobile phone technology is the primary objective of licensed operators in the UK. In today's climate the existing 4G network has allowed users to video stream at much faster data speeds allowing the integration of smart phones into wider uses than previous generations. The inevitable consequence of technological advancements means that customers expect tasks to become even quicker and simpler.

To quote the *5G and Future Technology* document, *"It is estimated that 5G will directly contribute to an additional £7 Billion a year to the UK economy in just six years from roll-out. Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas and ancillary equipment will be needed. But to do so the network needs to be surveyed, designed and planning approval obtained. It has been acknowledged by Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks."*

The introduction of 5G technology will improve the country's digital connectivity and appeal to visitors and businesses alike through the creation of smarter technology which will benefit the British economy.

"Examples of this new world that will emerge from ubiquitous 5G coverage involves such things as connected and autonomous vehicles, traffic management, smart manufacturing with heterogenous autonomous machines, direct machine to machine communication, advanced medical devices, automated agriculture, far greater security provision, more stable and reliable connectivity and advances in further application development with uses not yet identified. All of the above provides an insight into the future development of

connectivity in our modern world and also provides a further insight into the expected minimum eight-fold increase in data usage by each mobile operator over the next 5-6 years.

The national government recognises the importance of the 5G rollout which is a stance taken by government minister Margot James, the NPPF and The National Infrastructure Commission.

"5G has the potential to dramatically transform the way we go about our daily lives, and we want the citizens of the UK to be amongst the first to experience all the opportunities and benefits this new technology will bring…." – Margot James, the government minister for digital).

"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." – NPPF (July 2018)

"Getting 5G deployment right will be critical in a future where connectivity is becoming integral to almost all parts of the economy, and the UK will put its future growth and competitiveness at risk it if falls behind." – "Connected Future: National Infrastructure Commission 2016

Although Central Government understands that this may present concerns with the various design solutions proposed, it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. The government have also expressed support for new telecoms installations and the deployment of new technology. It is seen as essential for the country to develop and exploit the advantages of such new technology to the direct benefit of the public and the economy.

Coverage
The licence granted to EE and H3G demands that strict coverage qualities are met nationwide. It is essential that the benefits of mobile phones are available across the population. Mobile networks are constantly reviewed to ensure that there is adequate coverage and capacity to meet customer demands. In the current environment there is an expectation for signal coverage to be available at home, in the workplace, while shopping, enjoying leisure activities or in transit.

Quality
In order to ensure there is sufficient coverage within buildings such as homes, shops, offices etc. the radio signal has to be of adequate strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, which are sometimes less than 1 km apart. The improvement of 3G and 4G signal and introduction of 5G in this area will encourage economic advancement in accordance with the NPPF which seeks to develop connected environments.

Capacity
The upgrade of telecommunications masts across the country is an inevitable consequence of the continued growth of mobile phone usage. More sites are required to address the increasing traffic demands of each mobile user for tasks such as video or music streaming. Each cell or base station is limited to handling a finite number of calls meaning that areas of high usage will require additional cells to meet network demands and avoid congestion.

The Radio Implication of the Site
Radio signals are transmitted through the network by using fixed links at such frequencies that necessitate an uninterrupted line of sight. To achieve this, the installation must reach a sufficient height above surrounding buildings and trees. The installation must also be in a position to provide strong radio coverage to the target area that can also be received inside buildings.

The radio planning tool identifies deficiencies in the network and predicts the location from which the optimum coverage will be provided. Within these areas existing base stations are selected for an upgrade. The proposed installation subject to this application stems from this process where it is

imperative for mobile operators to provide high quality coverage to its customers. This is achieved through the improvement of existing network infrastructure and introduction of new base stations to fill in blank spots.

6. HEALTH AND SAFETY

The proposal for this site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines and therefore Health and Safety concerns should not be a planning consideration. An ICNIRP certificate is submitted with this application.

In addition to this, The Institution of Engineering and Technology's *Guide for Local Planning Authorities regarding 5G Masts and Small Cells,* provides a brief overview of 5G technology and the health issues that are often misunderstood. It concludes by saying, "*Small 5G base stations in our towns and cities will allow improved network coverage. They will reduce radio wave exposure to individual smartphone users and improve local 5G capacity for all manner of useful bandwidth-hungry applications. And a good 5G fibre base local broadband infrastructure will be important to local communities over the coming decades in view of the ever-increasing amounts of data being consumed by the general public.*"

7. CONCLUSION

A requirement for improved network coverage has been identified in this area. This is an upgrade of an existing site which will provide essential services for residents and businesses within the immediate vicinity. The proposed works have been designed sensitively in consideration for the character and appearance of the surrounding area in which the least amount of works has been proposed to minimise the visual impact of the proposal.

The applicant considers the proposal to be an acceptable development which should be viewed favourably by the local planning authority.