

SUPPLEMENTARY INFORMATION

1. Site Details

| | | | |
|--------------------------|----------------|-------------------------|--|
| Site Name: | Haddo House | Site Address: | Highgate Road, Highgate, London, NW5 1PX |
| National Grid Reference: | 528530, 185838 | | |
| Site Ref Number: | CTIL_234861 20 | 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: | Yes |
| Date of pre-application contact: | 1 st October 2021 |
| Name of contact: | N/A |
| Summary of outcome/Main issues raised: Pre-application correspondence was sent to the Local Planning Authority by email on 6 th October 2021. To date, no response has been received. | |

¹ Macro or Micro

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Community Consultation


| Rating of Site under Traffic Light Model: | Red | Amber | Green |
|--|-----|--------------|-------|
| <p>Outline of consultation carried out:</p> <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 6th October 2021 to the Highgate Ward Representatives; Councillors Berry, Lewis and Wright. A pre-application consultation letter was also sent to the Local Member of Parliament; Keir Starmer on 6th October 2021.</p> <p>Pre-application consultation letters were sent to 36 selected residential properties along Glenhurst Avenue, Gordon House Road, Highgate Road. A full list of consultees was provided to the Local Planning Authority on 6th October 2021. This can be provided again on request.</p> | | | |
| <p>Summary of outcome/main issues raised (include copies of relevant correspondence):</p> <p>One response was received from Councillor Wright concerned with the visual impact of the site.</p> <p>It is acknowledged that views of the equipment could be available, however, every effort has been made to minimise the visual impact of the site. The host building has been selected as it is an existing structure and will allow the equipment to have some visual screening by the surrounding mature trees and the development in the area. Views of the site will be relatively small area owing to road layouts, intervening developments, and the topography of the area.</p> <p>The decision was made to deploy equipment on the rooftop as it allows the character of the area to remain the same as the equipment will not be directly visible from ground level. The cabinets have been strategically located in a neat arrangement at roof level and will be set back from the edge of the rooftop. Given the height of the rooftop, it is therefore very unlikely that these cabinets will be viewed from ground level and will cause little or no significant harm to the visual amenity of the rooftop.</p> | | | |

School/College

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| |
|---|
| <p>Location of site in relation to school/college (include name of school/college):</p> <p>A search for schools and non-domestic childcare institutions was conducted via Ofsted and Department for Education databases. No schools or nurseries were located within 0.3 miles of the site.</p> |
| <p>Outline of consultation carried out with school/college (include evidence of consultation):</p> <p>N/A</p> |
| <p>Summary of outcome/main issues raised (include copies of main correspondence):</p> <p>N/A</p> |

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 |
| <p>Details of response:</p> <p>To date, no response has been received.</p> | | |


Developer's Notice

| | | |
|--------------------------------------|---------------------|-----------|
| Copy of Developer's Notice enclosed? | Yes | No |
| Date served: | N/A- Full Planning. | |

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3. Proposed Development

The proposed site:

The development site is located on the rooftop of Haddo House, a nine-storey residential block, located on Highgate Road to the west of its junction with Gordon House Road. The building is set within an area which has high-level and dense patterns of residential development.

The Haddo House is not statutorily or locally listed, located within the Dartmouth Park Conservation area.



Figure 1- Aerial view of the proposed application site (Image Source: Google Maps)

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Figure 2- Ground level view of application site looking west from Highgate Road (Image Source: Google Maps)

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 proposal is to provide new and improved 2G, 3G, 4G and 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.

Relevant Planning History


There have been two previous planning application at this site. The first proposal at this location, planning application ref: 2020/1456/P, was for the installation of 3no. antennas, 3no. cabinets and 1no. meter cabinet and ancillary works thereto. This was refused due to 'the proposed telecom antennas and poles on the roof, by reason of their location, number, height and design, would result in visual clutter which would cause harm to the character and appearance of the host property, local views and Dartmouth Park Conservation Area'. The proposal was redesigned in order to reduce the visual impact of the antennas, as well as to provide additional justification and explanations of the benefit of the proposed site, which was considered to outweigh the visual impact.

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A revised application, referenced: 2020/4559/P, was submitted to the Local Authority on 2nd October 2020 for the same scheme with some changes to the location of the antennas. The proposed sector 1 (facing north east) remained unchanged, and being face-mounted against the turret, this design minimised the additional fixtures needed to support the antenna by utilising the existing building face. Sector 2 (facing south east) the location of this sector is limited by radio requirements, and needed to be located on this building edge in order to minimise height of the antenna and to avoid clipping the rooftop. The existing position in the centre of the rooftop is considered to be the optimal location on this face, reducing the overall visual impact on both building faces. Sector 3 (facing West) was relocated to be closer to the turret in order to utilise the existing roof features more effectively. This will provide the antenna with an existing feature backdrop, helping to minimise the overall clutter on the roof, and reducing the visual impact from Parliament Hill. The relocation has been located as close to the turret as possible, limited by the skylights on the rooftop, in order to allow space enough to pass between the antenna and the skylight. This application was also refused due to visual impact.

Following receipt of the above referenced refusal a review of the siting and design was undertaken. The Local Authority did not object to the principle of siting telecommunication apparatus at this location and the Applicants remain satisfied that this is appropriate and also the best feasible option. Thus, revisions focussed on reducing the impact of development as far as practicable by relocating the equipment to the lower roof level and providing additional information that would enable the Local Authority to make a full and thorough assessment. It is considered that as a result of these amendments, the visual impact of the proposed installation is acceptable.

Enclose map showing the cell centre and adjoining cells if appropriate:

The site is required to provide improved services and further capacity within this area for the Operator, Telefonica UK (trading as O2).


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 London. These plots do not show the improvement to the capacity of the network, which will also be significantly improved. Capacity, is the volume of call and data traffic that can be handled by any one base station at a given time, does not display

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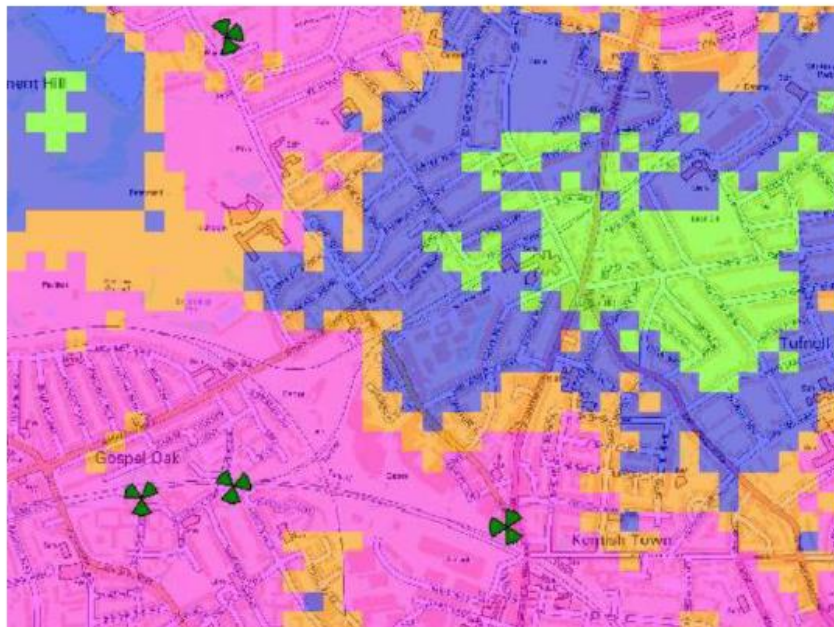
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on coverage plots. For example, an area may be coloured “pink” indicating a strong signal strength, but if there is a heavy network demand in these areas, the network might not have the available capacity to provide a stable and fast connection to the users.

The following images are extracts from radio modelling software, which compare mobile coverage with/without the Proposal in operation. Figure 3 shows the existing coverage pattern, Figure 4 shows the modelled improvement that would be delivered by the Proposal. Models show that the area surrounding the Site would go from receiving signal strength sufficient to provide service when ‘in Suburban’ (blue) or ‘in a car’ (green) on Telefonica, to the highest signal strength available which is sufficient service provision when indoor in a ‘dense urban’ area (pink).

CTiL – Existing Telefonica Coverage



| | |
|---------------------------------------|--------------------|
| ■ | 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.




Figure 3- Telefonica’s existing 3G coverage, Proposal not operational.

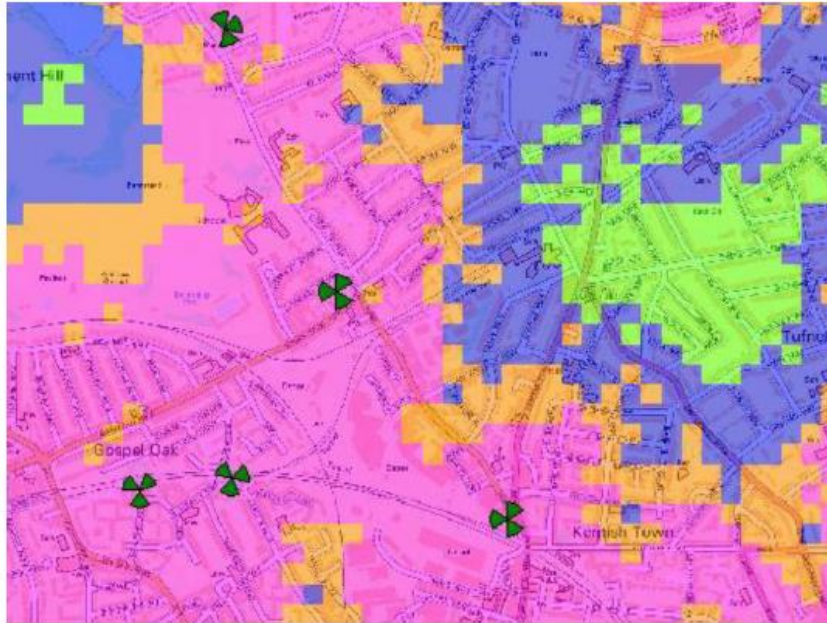
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CTiL - UMTS Telefonica (3G) Coverage with 79366



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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

Figure 4- Telefonica’s modelled 4G coverage, Proposal operational.

Type of Structure (e.g. tower, mast, etc):

Description:

The proposed development consists of the installation of 3no. antennas, 1no. 600mm dish, 1no. 300mm dish and 3no. equipment cabinets at rooftop level, 1no. meter cabinet at ground level and ancillary works thereto.

2no. cabinets with dimensions 750mm(w) x 600mm(d) x 1975mm(h)

1no. cabinet with dimensions 700mm(w) x 750mm(d) x 1800mm(h)

1no. meter cabinet with dimensions

Overall Height: 23.74m metres to the top of antennas

Height of existing building (where applicable):

N/A

Equipment Housing:

Length:

N/A

Width:

N/A

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| | |
|---|---|
| Height: | N/A |
| Materials (as applicable): | |
| Tower/mast etc – type of material and external colour: | Support poles- Galvanised steel |
| Equipment housing – type of material and external colour: | Steel- coloured grey (unless otherwise requested by the Local Planning Authority) |

| |
|--|
| <p>Reasons for choice of design, making reference to pre-application responses:</p> <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 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.</p> <p>To achieve the required coverage and network improvement for Telefonica 3no. antennas are required. With reference to drawing numbered 201, the antennas will be installed on three areas of the lower roof level, 1no. antenna will be located on north eastern corner, 1no. antenna located on the south east corner and 1no. antenna located on the south west corner. The height to the top of the antennas measures 23.74 metres which is does not exceed the existing height of the building. It should be noted that the antennas need to be installed at this height and location so that they are able to clear surrounding clutter and avoid clipping.</p> <p>Locating the antennas on the edge of rooftop allows for smaller scale support structures to be utilised. If the antennas were to be relocated to the centre of the</p> |
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rooftop, larger scale support structures would be required in order to avoid clipping from the rooftop edges. This would entail either taller support poles or for the antennas to be located on the top of the lift turrets. It is considered that both of these options would have a greater visual impact on the surrounding area than the proposal put forward.

The applicant deems that the siting of the antennas on the lower roof level would reduce the visual impact to the area. A GRP solution has also been considered at this site. However, given the distinct design of the circular rooftop lift turrets and technical requirement for the positioning and heights of the antennas, it has been discounted. This is due to the fact that a design with GRP would add a larger amount of visual clutter to the rooftop than an unshrouded design, and a shrouded design would not be possible that would be in keeping with the existing rooftop features and also be able to fulfil the technical requirement.

Radio signals are generated within radio equipment housing cabinets and 3no. equipment cabinets are required at this site and 1no. meter cabinet. With reference to drawing numbered 201, the 3no. cabinets will be positioned in a neat arrangement at roof level and set back from the edge of the rooftop on the south east side of the building against the side of the buildings upper roof level. Views of the cabinets located here would be limited or not possible from beyond the rooftop. 1no. meter cabinet will be located at ground level on the south side of the application site. The meter cabinet has been positioned against to the south edge of the property to ensure that the visual impact is kept to a minimum.

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.

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 the wider visual amenity or the surrounding area.


The need to preserve the character and appearance of the Dartmouth Park Conservation Area, and other heritage assets nearby, is fully acknowledged and by virtue of the proposal's siting, scale and appearance, this aim is achieved. The degree of visual change in the Conservation Area would be low. Included in this planning application is a Heritage Impact Assessment, which explores the impact on the setting of heritage assets in the vicinity of the proposed site. This assessment provides a detailed balancing of the argument of visual impact versus public benefits. Please ensure the statement is read and considered.

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As detailed, all apparatus required will play a vital role in enhancing the existing network services by increasing capacity and allowing for new network provision 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 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 setting or the wider setting, and the development has been designed to ensure that this is the case.

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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</p> | | |

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| <p>respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.</p> <p>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.</p> | | |
|---|--|--|

4. Technical Justification

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

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

The proposed development will enable the provision of 3G, 4G and new cutting-edge 5G services for the Telefonica mobile network in this area.


2G was the second generation of mobile phone transmission, it introduced data services for mobile, starting with SMS text messages. 3G was an extension to this and enabled the use of data. The main technological difference that distinguishes it from 2G technology is the use of packet-switching rather than circuit-switching for data transmission. Increased data rate to a minimum of 2 Mbit/s for stationary or walking users, and 384 Kbit/s in a moving vehicle.

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,

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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.

Practical Applications of 5G Connectivity as Example of Material Socio-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

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(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.

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.

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-Thame 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***

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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 (emphasis added).

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" (emphasis added).

In October 2020, the decision of Elmbridge Borough Council to refuse planning permission for the installation of a 15-metre-high monopole incorporating shrouded antenna and supporting 2no external dishes was overturned by the Planning Inspectorate (EE Ltd and H3G UK Ltd Vs Elmbridge Borough Council, appeal reference APP/K3605/W/19/3243927). Within the decision notice, the Inspector stated that:

"The mast would be taller and thicker than the existing nearby street lighting columns, road signs and overhead cable poles. Due to its height, the mast would be visible in local views from the public domain and from some residential properties in proximity....However, such masts are becoming more commonplace within the urban environment and so it would not appear as an alien or unexpected feature" (our emphasis).

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 ongoing 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.

We have seen a massive shift in user demand from city centres and business parks, to residential and suburban areas, as people have been displaced into working from home since March 2020. The previous 12 months have seen a huge surge in data consumption during the lockdowns of 2020 (which increased by 42% when compared to 2019 data) and the reliance that we all now have on these networks.


However, the proposed deployment of this base station is not driven by the Covid-19 global pandemic, but rather our increased dependence on Operator networks that

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has grown year-on-year, as outlined above. There is a clear need for this base station as the way people lead their lives is changing, and, as a consequence, our dependence on mobile networks has increased. The proposal before the Council will assist in improving connectivity and capacity in the area – a direction of travel which is supported by Central Government.

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.

Improved mobile coverage and connectivity is now no longer viewed as a 'luxury', but rather an every-day necessity. This has been further exacerbated as, at the time of writing, the country is in the midst of a third national lockdown in the space of 12 months. It is imperative that connectivity and capacity is improved – to allow home-working, home-schooling, online grocery shopping, and video-calling friends and family that we cannot physically visit. Our reliance on these established networks is at an unprecedented level and it must therefore be ensured that coverage is not only continued, but also improved – i.e. with the provision of brand-new 5G technology. The proposed development achieves these significant improvements.


A recent YouGov survey supports the need for increased connectivity and capacity, with 67% of those who are currently working from home and have been using mobile data agreeing that access to it will be an important factor when choosing where to live in the future. This rises to 76% for 18 to 34-year olds. The survey also confirmed that 44% of one network Operator's data traffic in January 2020 went to streaming services, such as Disney+, and that 45% of 18 to 24 year olds confirming that they are more likely to use their mobile data for browsing social media.

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As suggested by the above YouGov survey, family members of all ages rely on network coverage (for differing reasons) and the improvement of these services is essential. At the time of writing, our dependence on network services and connectivity is ever more apparent. Restrictions on travel resulting from the Coronavirus pandemic, combined with a third national lockdown, have resulted in a massive shift from office based to home working, from physical, professional and social gatherings to virtual ones, and to unprecedented reliance on online shopping and entertainment services. Usage within suburbs has increased dramatically as less people are travelling to town and city centres. Maintaining and enhancing the mobile networks is of vital national importance, and it is significant that telecoms has been designated as “critical work” during this time. It is anticipated that the current shift towards homeworking and online services will persist, to a lesser degree, in the future. It is vital that the infrastructure is in place throughout the UK to meet this demand.

The Ofcom Connected Nations 2020 UK Report outlines a sharp increase in both mobile and voice data, particularly during the enforced national lockdowns of 2020. The report states that average call volumes and average call duration increased in the week that national lockdown was introduced in March 2020, with mobile hotspots shifting away from city centres to the suburbs and residential areas as restrictions continued.

Significantly, the same report states that the consumption of mobile data saw a staggering rise of 42%, when compared with the previous year. Additionally, the traffic carried in England in June 2020 (during lockdown) exceeded that carried across the whole of the UK (England, Scotland, Wales, and Northern Ireland) in February 2020 (prior to lockdown).

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 benefits 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. This has become clear in the last 12 months, where a significant number of workers have been displaced into working from home.


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. In May 2020, this had

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doubled to 71% of online adult consumers using online video calling services at least weekly, with 38% using them at least daily. 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, where there continues to be a 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. This emphasises 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

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need to make sure that we change the law in all the ways necessary, that the wayleaves are granted, that the masts are built, that we increase coverage and that everyone is connected to the information superhighway. This is substantiated in the most recent budget announcement of 16th March 2016, which commits to provisions for “greater freedoms and flexibilities for the deployment of mobile infrastructure”.


In this instance, this proposal will add a new telecommunications site to the area in order to improve and enhance network coverage and capacity in this part of Highgate. The benefits of enhanced connectivity services can be achieved at this location through the very small height increase and is therefore considered to be a wholly appropriate planning solution.

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

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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.

When seeking a suitable location for a new site, there are a host of parameters to bear in mind, including:

- the relationship between the location of the proposed site and existing sites within the network; technical requirements;
- planning considerations (statutory protections, as well as consideration to what can be feasibly achieved with a design that will be visually appropriate);
- building considerations (whether a site offers the required flexibility to achieve the necessary antenna orientations and heights, which can be very specific requirements and not simply a case of protruding above a certain level, as well as structural feasibility and availability of power or fibre connections, amongst other things);
- the presence of natural or manmade features at, or near to, the location that might block or clip signals or prevent full propagation within the target coverage area; the relationship of the site to the target area in terms of height (for example, siting on a very tall building where coverage is required in a dip can be prohibitive); and
- land variances within the target area and other area specific attributes.

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.


It is with all these aspects in mind, that the applicant determined the selected location as the most suitable to meet the network's coverage need.

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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 | Chester Court, Lissenden Gardens, NW5 1LY | E528374, N85754 | This site has been nominated previously, but the proposed design's planning application was refused (2017/1353/P). |
| 2) Rooftop | Salcombe Lodge, Lissenden Gardens, NW5 1LR | E528380, N185732 | This building is adjacent building to, and very similar to the rooftop of option 1. It is anticipated that a proposal on the rooftop will be deemed in the same manner as (1). |
| 3) Rooftop | Heathview, Gordon House Road, NW5 1LR | E528447, N185696 | Compared with the nominated option, the building here represents a less preferred option to provide radio coverage to the surrounding area due to the reduced height of the building. |
| 4) Rooftop | Parliament Hill Mansions, Lissenden Gardens, NW5 1NA | E528364, N185789 | These buildings are adjacent to the previously nominated option at Chester Court (1) and is deemed an inferior planning option in terms of visual impact a site would bring. |
| 5) Street Furniture | Land opposite Woodsome Road, Highgate Road, NW5 1PL | E528425, N186056 | Due to the prevalence of mature trees along Highgate Road, a street furniture option along here would need to have a significant height to prevent tree foliage obstruction of the radio signal. A tall structure along the stretch of road would have a notable visual impact on the area. |
| 6) Rooftop | Lissenden Mansions, Lissenden Gardens, NW5 1QN | E528464, N185901 | Compared with the nominated option, this option within this rooftop would have a greater visual impact, whilst being at a lower height, reducing the |

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| | | | |
|---------------|--|---------------------|---|
| | | | effectiveness of the radio equipment to provide coverage to the target coverage area. |
| 7) Greenfield | Amey Depot, Gordon House Road, NW5 1LT | E528535, N185636 | A proposed site here is located too far south to provide optimal coverage to the target coverage area and is in close proximity to an existing O2 base station. A greenfield site here would require substantial height to be able to provide coverage to the target area, and utilisation of existing structure is preferred compared with the creation of new structures. |

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

N/A - The Applicants have undertaken a comprehensive search process during which all reasonable potential alternatives siting option have been discounted.

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

The application site is not located in an area considered to be environmentally sensitive, or within an identified protected habitat or protected species area. 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 on heritage assets in the area.


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

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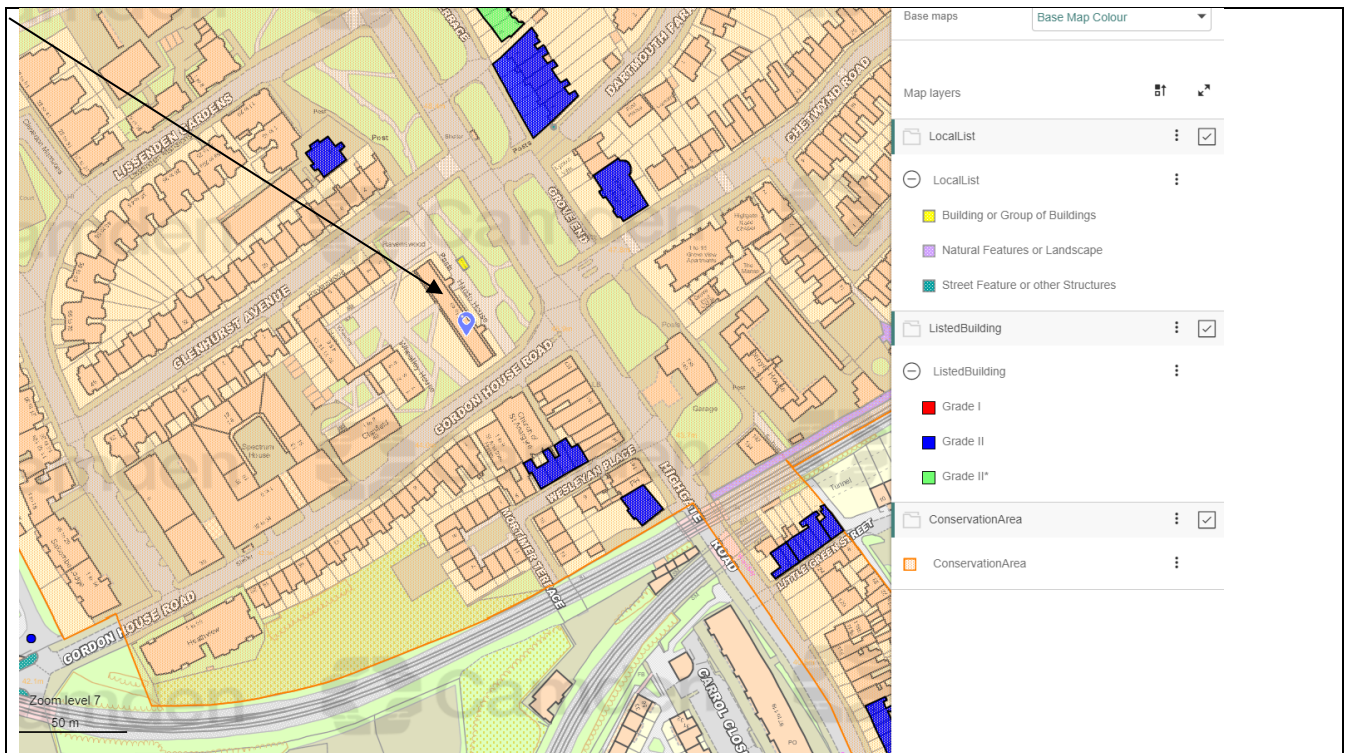
| General | | Town centres and employment | |
|---|---|---|--|
|  | Growth Area |  | Central London Frontage |
|  | Central London Area |  | Town Centre |
|  | Site Allocations proposal site (see below for names) |  | Neighbourhood Centre |
|  | Fitzrovia Area Action Plan |  | Industry Area |
|  | Euston Area Plan |  | Hatton Garden Area |
|  | Regent's Park Estate housing renewal and infill |  | Protected frontage: primary, secondary |
|  | Euston station and tracks special policy area |  | Primary (north)*, sensitive frontage* |
|  | Areas with a made Neighbourhood Plan (refer to the Neighbourhood Plan at www.camden.gov.uk/neighbourhoodplanning) | | *located in Camden Town only |
| Built environment | | Transport | |
|  | Conservation Area |  | Safeguarding Area |
|  | Ancient Monument | | High Speed 2: |
|  | Archaeological Priority Area |  | HS2 Surface |
| | Designated Views: |  | HS2 Sub Surface |
|  | Viewing Corridor |  | HS2 Homeowner Protection Zone 1 |
|  | Lateral Assessment Area |  | HS2 Homeowner Protection Zone 2 |
|  | Background Assessment Area | | |
| Natural environment and open space | | Waste and minerals | |
|  | Open Space |  | Waste Safeguarding Site |
|  | Metropolitan Open Land |  | Aggregate Safeguarding Site |
|  | 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 | | |

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**Figure 5- Application site within the context of Dartmouth Park Conservation Area.
Map Source- Camden Council Website**

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 located in Dartmouth Park Conservation area.


The Dartmouth Park Conservation Area Appraisal and Management Statement (adopted January 2009) reveals that the area has been classified as a designated area due to the special architectural and historic interest of this area. The area is made up of late 18th century terraces which contrast with contemporary housing estates; tiny cottages, large mansion blocks and Victorian villas, all existing together. The semi-rural quality of this area on the fringes of the Heath, is also an important aspect of the 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 and the surrounding Heath will not be adversely affected by visual impact.

When taking the nearby heritage asset into account, the development proposal is not considered to be visible from most views within the Conservation Area and will not result in a significant change to the street scene, within which they are experienced.

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It is not considered that the proposal would have a significant, negative impact on the importance of the Conservation Area when viewed within this urban environment. It is not considered that the proposal would have a significant detrimental impact on the setting of the nearby listed buildings nor on the character and appearance of the Conservation Area. The impact is less than substantial. The Applicant highlights that the National Planning Policy Framework (NPPF) at paragraph 202 advises that proposals which would lead to 'less than substantial harm' to a heritage asset must be weighed against public benefit.

Heritage Planning Policy - National and Local

When determining planning applications that affect heritage assets, paragraph 194 of the National Planning Policy Framework (July 2021) (NPPF) places an onus on those proposing changes to the historic assets and their setting, to include a clear description of the significance of the assets affected. It is noted that the requirement in the NPPF is that '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'

The NPPF also advises that local authorities should take account of (para. 197):

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

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

Paragraph 199 follows with:

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'

Paragraph 202 clarifies:


'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.'

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In considering the potential impact of the proposal on the Conservation Area and setting of the nearby Listed Buildings, it is submitted that significant weight should be given to the need to allow the Applicants to implement their proposal in view of the wider socio-economic and sustainable development benefits of providing improved capacity and new 5G services within this area of London in the public interest, which is entirely in accordance with the NPPF.

This critical infrastructure will serve a high number of residents, businesses, and commuters in the nearby designated area; thereby enhancing the function of the conservation area and providing public benefit which includes contributing to 'sustainable communities' and 'economic vitality'. The proposal accords with paragraph 197 of the NPPF in this respect.

When considering potential impacts of the proposed development on heritage assets, it is important to recognise that the Conservation Area covers a large area and includes a wide variety of areas of differing characters. It has been demonstrated that the impact of the proposal, on these heritage assets, is less than substantial, owing to the height of the surrounding buildings, available views and the scale and location of the development proposal.


A case can be made the proposal complies with heritage policies within the NPPF, as it is considered that the amount, layout and scale of apparatus is relative to the scale of the building as a whole, would ensure that its appearance is not significantly changed. It is considered that Haddo House is not typical of the historic buildings that contribute to the character of the conservation area nor a positive contributor to it. However, it is acknowledged that elements of the proposed telecommunications equipment, are located within a heritage asset and thus has the potential to impact upon it. The Applicants consider this impact to be less than substantial. Whilst views of the application site are limited, the Applicants do not suggest that the proposal would not be visible from some vantage points, within the Conservation Area rather that any view, would not be unacceptable or detract from the heritage assets. Within the majority of views, where they are achievable, the rooftop is seen within the context of a busy, urban area containing some modern developments. Modern infrastructure is observed in views, in and through the area.

Whilst the position of the proposed telecommunications equipment reflects the operational requirements, in particular the confines the surrounding cityscape, consideration has been made as to the external treatment of the equipment in order to develop an option which best responds to heritage assets. In this case, it was determined that locating 3no. antennas on the lower roof level would result in it being more recessive against the skyline.

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It could reasonably be concluded that the proposal would lead to “less than substantial harm” (NPPF, para 202) to the adjacent conservation area. As such and in accordance with the NPPF, the less than substantial harm must be weighed against the public benefits to the surrounding area which are considerable, as outlined above in section 4 of this document. In this case, the Applicant considers that the less than substantial harm, on the nearby Conservation Area, will be outweighed by the public benefits of the proposal.

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

Siting and Appearance

From the outset, it should be appreciated that irrespective of the development's use as a communications site, the installation of a new equipment will always be, to some degree, a noticeable addition in the local area. However, it should be recognised that visibility or a development's siting and appearance, does not automatically result in an overwhelming adverse harm.

The Applicants give 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 an acceptable level.

It has already been detailed that views of the host building and thus the proposed equipment, are restricted to a relatively small area, owing to road layouts, height of the building and intervening tall developments, across the wider area. It has further been detailed that short range views of the proposed telecommunications apparatus from street level will be naturally restricted owing to the height of the host building and surrounding tall buildings. The scale and design will reduce any perceived negative visual impact caused by this proposal, as far as practicable.


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. In this case, the technical requirement can be met through using an existing rooftop, allowing for the deployment of a new site for Telefonica.

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

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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 Highgate. 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

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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.

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

Planning Policy Context:

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

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


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

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe*

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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."*

The proposal would meet the aims of sustainable development with respect to providing critical mobile digital infrastructure to underpin local economic growth; facilitating social inclusiveness through the provision of effective electronic communication services; and in an environmental role through supporting home-working, for example, which is linked to a reduction in transport emissions and therefore climate change mitigation.

Paragraph 114 emphasises the significance of delivering the latest communications infrastructure:

'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 proposal is such 'essential' infrastructure, delivering high quality mobile technology, and as such it is national policy that planning decisions should support such proposal.

The NPPF encourages the use of existing masts for new electronic equipment. The proposal therefore adheres to paragraph 115 of the NPPF which states:

*'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.** 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.'*

Other Relevant National Guidance


UK Digital Strategy

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The UK Digital Strategy, published by the Department for Digital, Culture, Media & Sport in March 2017, provides evidence of the public benefits of communication services:

'Broadband and mobile must be treated as the fourth utility, with everyone benefiting from improved connectivity. This will play a crucial role in ensuring that everyone, wherever they live and however they connect, can make full use of digital services and benefit from participation in the digital economy. Improved connectivity also increases innovation and productivity across the economy, bringing significant economic rewards'

'5G is the next generation of mobile connectivity, and is currently in development. It is expected to represent a significant upgrade: providing ultrafast, low latency, and more reliable mobile connectivity, able to handle our ever-increasing data requirements. This should present huge opportunities to boost productivity and grow the economy. In addition to giving consumers and business users high quality connectivity, it will also support the development of the Internet of Things: the rapidly-increasing number of connected devices, from connected cars to digital health applications.'

Future Telecoms Infrastructure Review

The Department for Digital, Culture, Media & Sport published its findings of the Government's Future Telecoms Infrastructure Review in 2018. The review highlights the important and far reaching role of 5G infrastructure:

'Alongside finishing the roll out of 4G networks to meet existing mobile demand, we want the UK to be a world leader in 5G to take early advantage of this new technology. We have set a target that the majority of the population will have 5G coverage by 2027.'

'The technical capabilities and performance characteristics of 5G are clear. 5G is expected to deliver faster and better mobile broadband services to consumers and businesses, and to enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare.' (p 10)

Other Material Considerations


Appeal decisions by the Planning Inspectorate can be of material consideration in the determination of planning applications. The cases below are examples where the Inspector has awarded notable weight to the improved network coverage and

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capacity arising from new telecommunications development. The Proposal is required in order to deliver the same improvements.

The following are examples of appeal decisions by the Planning Inspectorate where the Inspector awarded considerable weight to the public need for critical communications infrastructure. All cases below relate to the installation of new rooftop base stations within Conservation Areas. The following appeals were all allowed. Emphasis added to quotes by author.

1. APP/X5990/W/21/3270675 – MBNL vs City of Westminster Council

'...The proposal would therefore have demonstrable social and economic benefits which weigh significantly in the proposal's favour...

Notwithstanding the great weight to be given to the conservation of designated heritage assets, taking into account the need for the installations and the demonstrated lack of suitable alternative sites, I conclude that the benefits of continued and potentially enhanced communications outweigh the limited harm to the character and appearance of the Area and provide clear and convincing justification for that harm in this case.

I have found above that the proposal would not accord with the development plan taken as a whole. However, I find that the benefits of continued and potentially enhanced communications are a material consideration that indicate that a decision should be made other than in accordance with the development plan in this case.'

2. APP/G2625/W/20/3254990 – MBNL vs Norwich City Council

'However, the harm must be considered in the context of the special attention I must pay to the desirability of preserving or enhancing the character or appearance of the CA. I afford considerable importance and weight to this statutory duty. This does not amount to a direction to refuse proposals that harm, and thus fail to preserve, designated heritage assets, but it provides a strong presumption in favour of preservation.


In applying the balancing test of paragraph 196 of the Framework, I consider that the benefits identified above substantially outweigh the harm that would arise from the proposal's impact on the character and appearance of the CA. Thus, I find that the material harm that would arise from the proposal would be outweighed by its substantial public benefits.'

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3. APP/V5570/W/20/3246770 - Cornerstone Telefonica and Vodafone vs London Borough of Islington

'I have found that the proposal would fail to preserve the character or appearance of the CGCA (Conservation Area) and would cause a minor level of less than substantial harm to the heritage significance of the CGCA and various other designated assets through development within their settings. I have also identified associated policy conflicts. Indeed, the proposal conflicts with the development plan when read as a whole.

However, I have also found that the proposal would deliver significant public benefits through improved digital communications networks. These benefits would outweigh the heritage harms that I have identified. Thus, material considerations indicate that, in this instance, the proposal should be determined other than in accordance with the development plan.'

4. APP/V5570/W/20/3251047 - CTIL and Telefónica (O2) Vs. Council of the London Borough of Islington

'there would be a considerable public benefit arising from the provision of improved digital communications networks in this busy commercial area, and I consider that this carries significant weight [...] **the proposal would fail to preserve or enhance the character or appearance of the Bunhill Fields and Finsbury Square Conservation Area, and would cause less than substantial harm to the significance of the Conservation Area as a designated heritage asset.**

In this respect I have also found conflict with planning policies, and indeed the proposal would conflict with the development plan as a whole [...] However, I have also found that **a significant public benefit would be delivered through the provision of improved mobile communications networks, which would outweigh the limited harm to the heritage asset which I have identified.'**

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 The London Borough of Camden, relevant to the proposal comprises:

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- The London Borough of Camden Local Plan (Adopted 2017)
- The London Plan: Spatial Development Strategy for Greater London (adopted 2021)
- Dartmouth Park Neighbourhood Plan (2020)

The London Borough of Camden Local Plan (Adopted 2017)

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). This policy aims to preserve and enhance Camden's heritage assets, including conservation areas and listed buildings. Development within conservation areas is required to preserve or enhance the character or appearance of the area.

It is considered the proposal complies with both policies. The scheme has been specifically designed for this location. The search for a site followed a sequential approach which resulted in the progression of the application site. Within the constraints of having to locate the antennas close to the edge of the building for technical reasons, the equipment has been sited to ensure the impact on the surrounding area would not be excessive. The design of the development achieves this.

The building is located within the Dartmouth Park Conservation Area. As set out in this document, it is considered there would be a less than substantial impact on heritage assets, and this less than substantial impact would be outweighed by the significant benefits of the proposal.

Also, to note is Camden Planning Guidance – Digital Infrastructure (2018). This document sets out as a key message that “The Council will support the expansion of electronic communications networks, including telecommunications and high speed broadband” and goes on to set out that proposals for telecommunications equipment will be determined in accordance with the National Planning Policy Framework (see section above).


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

Overall, it is considered the proposal complies with both national and local policy. 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 on heritage assets would be outweighed by the significant benefits of the proposal.

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Dartmouth Park Neighbourhood Plan 2020

Policy DC1 (Enhancing the sense of place) necessitates that any development should enhance the sense of place and characteristic relationship between the built environment and the open areas in Dartmouth Park. The proposal complies with this policy because the antennas have been relocated to the lower roof level and be of a height that does not harm the view from Parliament Hill because the antennas will not exceed the existing rooftop height. The proposal maintains and enhances the green and leafy character of the area being located on an existing rooftop and therefore further complying to this policy.

Policy DC2 (Heritage assets) aims to preserve or enhance the Dartmouth Park Conservation Area, historic buildings and buildings of architectural merit and their settings. The proposed development will preserve the character and appearance of the conservation area by being located on the rooftop. The minimal visual impact caused will be outweighed by the significant improvements to the Telefonica network in providing improvements for multiple technologies and introducing new 5G network coverage to the surrounding area.

Policy DC3 (Requirement for good design) requires all developments to demonstrate good quality design, responding to and integrating with local surroundings and landscape context. This proposal has been carefully designed to ensure that local surroundings are not adversely affected by the development.

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

The London Plan 2021

ENSURING THE INFRASTRUCTURE TO SUPPORT GROWTH

'Digital connectivity and associated infrastructure is a key consideration in the CAZ where densities of commercial development in particular are high. Where necessary, development proposals should seek to aggregate demand in areas not currently served by high-speed connectivity and liaise jointly with providers to ensure that infrastructure requirements can be planned and delivered appropriately (see Policy SI 6 Digital connectivity infrastructure).'

Planning for a 'smarter' city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners. (para 1.0.10)


The right infrastructure is also required to help businesses succeed across London. The digital economy, underpinned by world-class digital connectivity, data and digital

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services is of ever-increasing importance, improving processes, opening up new markets and allowing more flexible working. Convenient transport connections and street, rail and waterway networks that allow the efficient movement of goods and people are also vital, alongside the schools, healthcare facilities and other amenities that employees need to be healthy and productive.’ (para. 1.5.4)

POLICY SI 6 DIGITAL CONNECTIVITY INFRASTRUCTURE

A. To ensure London’s global competitiveness now and in the future, development proposals should:

1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users

2) **meet expected demand for mobile connectivity generated by the development**

3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation

4) **support the effective use of rooftops** and the public realm (such as street furniture and bins) **to accommodate well-designed and suitably located mobile digital infrastructure.**

B. **Development Plans should support the delivery** of full-fibre or equivalent **digital infrastructure**, with particular focus on areas with gaps in connectivity and barriers to digital access. (emphasis added)

‘Fast, reliable digital connectivity is essential in today’s economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration.’ (para 9.6.1)

POLICY D2 INFRASTRUCTURE REQUIREMENTS FOR SUSTAINABLE DENSITIES


‘Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.’

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The revised guidance is clearly supportive of the proposal and the role that it will perform allowing Telefonica to provide new and improved coverage to the surrounding area.

London Infrastructure Delivery Plan 2050 (published 2014)

As part of the work on the 2015 London Plan Alterations, the Mayor commissioned work to develop a long-term infrastructure investment plan for London, and in 2014 the 'London Infrastructure Delivery Plan 2050' was published. The stated aim of the Infrastructure Delivery Plan is to provide for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan, Digital Connectivity, indicates how the Mayor's Office will support a mix of technologies including mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term, as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. Deployment of the proposed base station will contribute to London's agenda for reliable high-speed communications as it has been designed to incorporate emerging and future technologies. Among other matters the Delivery Plan stated:

"Broadband is now considered the fourth utility. The Government has stated that it wants 99% of the population to have superfast connections by 2018. Internet access speeds and coverage affect the productivity of businesses and are now a factor considered by homebuyers. Access is not only essential to many businesses, but also, as more local authorities are encouraged to move the services they provide online, access is essential for residents to be able to take part in a modern society. The Mayor wants every resident and business in London to be able to have affordable high-speed internet connectivity, should they choose to access it".

This proposal seeks, individually, to provide high speed internet connectivity throughout London. The revised guidance is clearly supportive of the proposal and the role that it will perform allowing Telefonica to provide improved coverage to the surrounding area.

Summary

The application seeks the authority's approval for proposed telecommunications equipment to be installed at Haddo House. The principle aim of the proposal is to improve mobile coverage of Telefonica's network and introduce 5G services to this area.


The proposal amounts to a change to the appearance of the host building to enable far reaching public benefits for the surrounding area. The relatively small-scale infrastructure at roof level, commonplace in urban areas and would not have an

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unacceptable level of impact or one that would not be outweighed by the public benefits.

The proposal would not only ensure that a high number of residents, businesses and commuters do not experience poor connectivity for their mobile devices, it would also provide improved services. Modern communication services have evident social, economic and environmental implications.

In terms of heritage assets, any harm to their character and appearance, this would be in isolated views towards the Application Site and would be "less than substantial". Therefore, in accordance with paragraph 202 of the NPPF, such harm must be weighed against the public benefits of the proposal which, in this case, are far reaching as set out under Section 4. It is considered that the significant public benefits outweigh the less than substantial harm to the character and appearance of the conservation area.


Confirmation that submitted drawings have been checked for accuracy

| | | | |
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| | | (on behalf of Cornerstone) | |

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