SUPPLEMENTARY INFORMATION

The Government published a technical consultation on proposed amendments to the General Permitted Development Order for electronic development to support the deployment of 5G. This follows the 2019 consultation on the principle of these proposed reforms.

The latest consultation seeks views on proposed planning reforms to amend permitted that will allow the deployment of telecoms equipment to be quicker whilst ensuring that there are appropriate environmental protections and safeguards in place.

The consultation which is now closed can be viewed at: https://www.gov.uk/government/consultations/changes-to-permitted-development-rights-for-electronic-communications-infrastructure-technical-consultation/changes-to-permitted-development-rights-for-electronic-communications-infrastructure-technical-consultation

Permitted development rights for electronic communications infrastructure are a critical element in the planning regime for streamlined and cost-effective deployment of telecommunications infrastructure. They benefit both mobile network operators and local planning authorities in the effective management of limited time and resources. Permitted development rights also facilitate investment in network infrastructure resulting in improved service to customers and help in delivering significant socio- economic benefits to society both nationally and locally.

The Government is consulting on proposals to amend permitted development rights to enable the deployment of building-based masts to increase mobile coverage and mitigate the impacts of ground-based masts. Respondents to the August 2019 consultation supported measures that would encourage the greater use of buildings for electronic communications infrastructure, as this would help reduce the environmental and visual impacts of networks. In order to further encourage the use of buildings for the installation of electronic communications equipment the Government proposes to introduce a further permitted development right for shorter masts which would mean that proposals such as the application would not require approval and would be permitted development.

On May 24th 2021, Matt Warman MP, Minister for Digital Infrastructure wrote to all Local Authority Chief Executives in England stating:

"Mobile Connectivity and 5G infrastructure – Planning"

"Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data is increasing rapidly, and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity.

The Government is committed to extending mobile network coverage across the UK and providing uninterrupted mobile signal on all major roads, and our ambition is for the majority of the population to have access to a 5G signal by 2027. Last year we agreed a £1 billion Shared Rural Network deal with the UK's mobile network operators to extend 4G mobile geographical coverage to 95% of the UK by 2025.

The Government is also investing £200 million in a programme of 5G testbeds and trials to encourage investment in 5G so that communities and businesses can benefit from this new technology. The increased capacity, reliability and functionality offered by 5G is opening-up the potential for new, innovative services for individuals and increased productivity for industry.

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The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliant on mobile connectivity. Following our consultation on the principle of reforms to permitted development rights to support 5G deployment and extend mobile coverage[1], we recently published a technical consultation on the details of our proposed changes.

The National Planning Policy Framework ("the Framework") for England states that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology, such as 5G.

The Framework is clear that decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing. In relation to electronic communications development, it also states that local planning authorities must determine applications on planning grounds only and they should not seek to prevent competition between different operators, or question the need for an electronic communications system. As set out in planning practice guidance, it is in the public interest for local planning authorities to have effective delegation arrangements in place to ensure that decisions on planning applications that raise no significant planning issues are made quickly and that resources are appropriately concentrated on the applications of greatest significance to the local area.

We know that some constituents have expressed concerns about the potential harmful effects on human health of 5G. Public Health England (PHE), the Government's independent advisers on matters of public health, is clear that there is no credible evidence of a negative impact of mobile technology, including 5G on people's health. Central to PHE's advice are the guidelines published by the International Commission on Non-Ionizing Radiation Protection (ICNIRP), which is formally recognised by the World Health Organisation.

The National Planning Policy Framework requires mobile infrastructure providers to self-certify their compliance with the ICNIRP guidelines. It also sets out that local planning authorities should not set health safeguards different from the International Commission guidelines for public exposure".

1. Site Details

Site Name:	Lowlands Court	Site Address:	Lowlands Court 2-8 Eton Avenue Belsize Park London NW3 3EJ
National Grid Reference:	E:527420 N:184566		
Site Ref Number:	30373000	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)

[1] Macro or Micro

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Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
If no explain why: No mast register available.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: A copy of the proposed plans together with a covering letter were sent to the Chief Planning Officer on 29.11.2021. At the time of making the application no response had been received.	

Community Consultation

Rating of Site under Traffic Light Model:	~~Red~~	**Amber**	~~Green~~
Outline of consultation carried out: Pre-application consultation was carried out with the Belsize Ward Councillors, Anne Clarke AM and Tulip Siddiq MP. Pre-application consultation letters and drawings of the proposals were sent to these parties on 29.11.2021.			
Summary of outcome/main issues raised (include copies of relevant correspondence): No response to pre-application at the time of making the application.			

School/College

Location of site in relation to school/college (include name of school/college): • Sarum Hall School
Outline of consultation carried out with school/college (include evidence of consultation):

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Pre-application consultation letters and drawings of the proposals were sent to this party on 29.11.2021.
Summary of outcome/main issues raised (include copies of main correspondence): The following response has been received from the school's headteacher: *"Thank you for providing the School with notification of the proposal to apply for planning consent to re-site a mobile phone base station from The Hampstead Britannia Hotel to Lowlands Court in Eton Avenue.* *For the record Sarum Hall School is at 15 Eton Avenue. We are an independent day school for Girls aged between 3 and 11. The school is approximately 160 metres to the west of Lowlands Court.* *Irrespective of all the published information about the safety of 5G technology and the transmission of radiofrequency electromagnetic fields (a low-energy form of radiation) it is our intention to object to the application because:* *• There are already mobile phone masts on almost all the local buildings over 8 storeys, particularly Dorney Tower (23 storeys). Even if 5G technology requires more density and coverage we are questioning why more aerials are needed so close to those other existing installations, particularly in Eton Avenue on a relatively low 5 storey building. The Operators should be sharing existing installations rather than proliferating more.* *• The school netball court and playground is the part of the school site that is closest to Lowlands Court. Even if only a low energy form of radiation is emitted, all our children when playing sport and enjoying the outside space will be exposed and completely unprotected.* *• Public Health England say "It is possible that there may be a small increase in overall exposure to radio waves when 5G is added to an existing network or in a new area. However, the overall exposure is expected to remain low relative to guidelines and, as such, there should be no consequences for public health." I have highlighted a few sections in blue because the school has a duty to safeguard our schoolchildren and "possible" and "should be" are not definitive enough.* *• The UK's telecommunications regulator, Ofcom, say "we're still in the early stages of 5G adoption", and they will "continue to undertake EMF measurements to monitor the overall trends in the long term". Clearly even they are not sure, they will be continuing to monitor and therefore it is a work in progress. In our view it is not acceptable for young schoolchildren to be a test bed for further research and monitoring.* *There may well be no current evidence to suggest there are health risks from 5G masts but on behalf of all our staff and children we need complete and total certainty.* *Therefore The Governors of the School have resolved to object to the planning application when submitted."*

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?		N/A
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		

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Details of response: N/A - Full Planning Application

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	
Date served:	N/A - Full Planning Application	

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3. Proposed Development

The proposed site:

Background

Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage, and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. They oversee works on behalf of telecommunications providers and wherever possible aim to:

- promote shared infrastructure
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development

Cornerstone are in the process of progressing a suitable replacement site in this area of Eton Avenue for a radio base station. As part of Cornerstone's continued network improvement program, there is a specific requirement for a replacement installation at this location to provide equivalent and improved 2G, 3G and 4G coverage and capacity, ensuring that this area of Eton Avenue maintains access to the latest technologies for Telefonica service provision.

The site is for replacement coverage which cannot be provided at the current location, as the operator has to remove their equipment from the existing site at Britannia House, Primrose Hill Road, Hampstead, NW3 3NA. As such, the operators need to find a replacement site to ensure the latest technologies including new 5G services can be provided in this area of Eton Avenue. The site is identified below in Image 1.

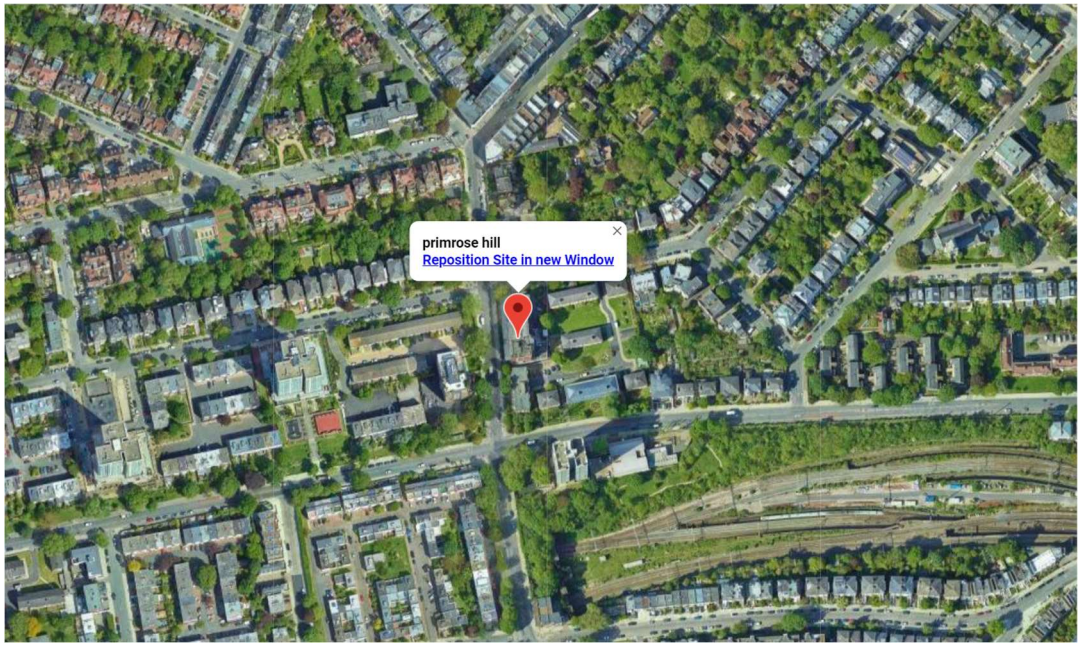

Image 1: Existing Site

The operator is limited in siting options as there is a requirement to provide equivalent replacement coverage and capacity for this area of Eton Avenue. The replacement of an existing site means that

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the operators have to be located as close as possible to the existing installation in order to maintain the provision of equivalent coverage and capacity to the surrounding local area.

The site is located to the north of the existing site as shown in Image 2 below. The equipment will be viewed in the context of the multi level design of Lowlands Court. Moreover, there are a number of linear structures within the street scene including lighting columns, street trees and road signage which serve to draw the eye away from the rooftop and will help the equipment assimilate with its surroundings.

Image 2: Replacement site at Lowlands Court

As 5G is to deliver new technology, so too the infrastructure required is different than that necessary to provide the previous generations of connectivity. Wherever possible, existing installations will be utilised to accommodate the necessary infrastructure. Due to the beamforming technology required for 5G service, the antenna height in many cases must be greater than that for previous generation technology.

The Covid-19 pandemic has created unparalleled demand and pressure on the operators' networks while people try to keep life and the economy moving through isolation and containment measures, with many people now working from home or remotely. This is a perfect example of why the operator must continue with its rollout as streamlined as is possible.

For the first time in history, all of the mobile networks sent out a government message to their customers with details of the new shutdown measures. The message from 24 March 2020 reads: '*GOV.UK CORONAVIRUS ALERT. New rules in force now: you must stay at home. More info and exemptions at gov.uk/coronavirus Stay at home. Protect the NHS. Save lives'*. Even the World Health Organisation

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launched a WhatsApp chatbox allowing people to get instant information about the coronavirus through the smartphone messaging application. None of this would be possible without the physical infrastructure associated with mobile phone industry such as masts, antennas, microwave dishes and cabinets.

The importance of mobile connectivity during the pandemic was reinforced by DCMS in succinct advice to local authorities and operators published on 02/04/20: '*Government recognises the ongoing importance of the telecommunications industry at this critical time. Now, more than ever, the country is reliant on fixed line and mobile communications networks. Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak.*' The advice sets out (albeit in relation to emergency access provision) that '*Fully operational telecommunications infrastructure is needed to support mass homeworking and critical connectivity to emergency services and hospitals. Network operators must be able to rectify network outages promptly and to mitigate any effects of network degradation over the duration of this emergency period.*'

Digital Infrastructure Minister Matt Warman in his Keynote Speech at 'Connected Britain 2020' provided the latest endorsement from Central Government on the importance connectivity. He stated:

"The theme this year is the future of UK connectivity. But before I talk about that, I'd like to take this opportunity to thank everyone in the industry for their tireless efforts at keeping us all connected through an unprecedented period of disruption.

You have kept school children connected with their teachers, allowed isolated grandparents to speak to their grandchildren, and enabled great British businesses to power the economy through these difficult times. Without a good connection, I would not be able to join you all at Connected Britain. Thank you.

In my speech, I am going to touch upon the exciting work that the Government is doing on broadband and 5G, and also the efforts that we are taking to make these networks more secure for the long term.

But, first, I thought that I would reflect on the changed times that we are living in. COVID has altered the way we live, work and, most importantly, stay connected with our family and friends. The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown - and is now more important than ever as we head into recovery. Many of these changes - such as increased working from home - will stay with us for the foreseeable future.

***People in this sector have long referred to the internet as "the fourth utility" - and it's true**. For countless people across the country, having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity".*

The Digital Infrastructure Minister stated that underpinning the Government's connectivity ambitions would be a Digital Strategy which will set out how the Government will drive growth in the tech sector and economy, and ensure we maximise the benefits of a tech-led economic recovery.

"And to bring us full circle, at the strategy's heart will be our vision for providing world-class digital infrastructure to all, in a way that is safe, secure and built for the future".

The Site

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This application relates installation of a telecommunications base station at Lowlands Court shown on the photograph below:

Image 3: Lowlands Court

The proposal is for the proposed installation of a new base station consisting of 6 no antenna, 2 no 300mm dishes and 3 no cabinets along with ancillary development thereto on the rooftop of Lowlands Court.

Lowlands Court is an unlisted building and is within the Belsize Park Conservation Area. The application site is Lowlands Court on the corner of Belsize Park Gardens and Eton Avenue. The building is neither listed or locally listed.

Lowlands Court is a five storey building on the northern side of Eton Avenue. The building is in residential use and is only accessible to residents. The site is circa 750m from Swiss Cottage Underground Station and 650m from Chalk Farm Underground Station.

The location enables the whole of the surrounding area to benefit from improved 5G network coverage, thus enabling other technologies to be deployed. As the shift in demand is expected for the foreseeable future and that as central Government considers digital communications to be a critical national infrastructure, the operator intends to support customers and local residents by ensuring as little disruption as possible.

Cornerstone and Telefonica are in the process of progressing a suitable site in the Eton Avenue area for a replacement radio base station. As part of Telefonica's continued network improvement

program, there is a specific requirement for a replacement rooftop installation at Lowlands Court to replace the nearby radio base station which will be lost at Britannia House. There is therefore an urgent need to provide replacement coverage as soon as possible, as the operator's customers will be unable to utilize their handheld devices in this cell area contrary to the operator's legal requirements to provide a service and the customers reasons for purchasing their handheld devices. A replacement installation in this location will ensure that the latest high quality 2G, 3G,4G service provision is maintained and enhanced in and around Eton Avenue as well as the provision of new 5G services.

An installation on this existing building will ensure that the latest high quality 2G, 3G, 4G are maintained for Telefonica as well as new 5G services are provided in and around this area of Eton Avenue.

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

The site is required to help fill the 2G, 3G and 4G coverage loss following the decommissioning of the existing site at Britannia House.

The site has been removed from the network and there is no reliable coverage for Telefonica in this part of Eton Avenue. There is therefore an urgent need to provide permanent replacement coverage as soon as possible, as the operator's customers will be unable to utilize their handheld devices in this cell area when the site is removed and this is contrary to the operators' legal requirements to provide a service and the customers reasons for purchasing their handheld devices.

A replacement installation in this location will ensure that the latest high quality 2G, 3G, 4G services for Telefónica are maintained and enhanced in and around Eton Avenue. In addition, the replacement site will provide new 5G services.

The operator is seeking to replace the former installation on Britannia House to enable enhanced 2G, 3G and 4G coverage and capacity to the surrounding area as well as new 5G services for Telefónica to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

The 3G and 4G provision allows internet access, video calling, data downstreaming, accessing social media networks and emailing to name just a few of the benefits. Therefore, to maintain high quality indoor 3G and 4G services into this area would promote activity in line with the general population demand as the ownership of smart devices increases. 5G will deliver unparalleled speeds and capacity, with significantly reduced latency, which will be needed to deliver numerous innovative applications from autonomous cars to Internet of Things.

A permanent replacement site in this location will ensure that the security of the latest technologies will be provided into the network particularly for the data hungry applications of the latest smart hand-held devices. The operators have followed a sequential approach to site finding and identified this site as part of this process.

As an existing building to the north of the existing site has been identified and will provide the necessary replacement coverage/capacity and improved services within this area of Eton Avenue.

3G and 4G signals by their very nature (as they carry high data rates) do not penetrate over long distances, (5G even less so), just a few hundred metres, depending on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness.

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Without this replacement site at Lowland Court the numerous business, visitors, residents who depend on the service will notice their service sharply diminish resulting in dropped calls, the inability to make calls and non-existent or slow internet access. Clearly this would result in significant detrimental, social and economic impacts for the community should a replacement not be found and this is contrary to NPPF.

Fact sheets on Radio Planning and Propagation, 5G services and General Background Information have been attached to this application for reference.

Type of Structure: 3 x tripod support frame	
Description: The proposed installation of a new base station consisting of 6 no antenna, 2 no 300mm dishes and 3 no cabinets along with ancillary development thereto on the rooftop of Lowlands Court.	
Overall Height:	20.6m AGL
Height of existing building *(where applicable):*	14.60m AGL Roof Level
Equipment Housing: 2 x 42U FPF	
Length:	750mm
Width:	600mm
Height:	1800mm
Equipment Housing: 1 x 5th Gen PSU	
Length:	700mm
Width:	730mm
Height:	1700mm
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel – Grey (poles can be painted to match brick work if required.)
Equipment housing – type of material and external colour:	Grey

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

Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (Paragraph 126) National Planning Policy Framework (Revised). It states:

'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 keeping with the National Planning Policy Framework (NPPF) guidelines of using: "high quality communications infrastructure", the proposed design has been selected to minimise visual impact upon the surrounding environment.

The proposed installation of a new telecommunications base station consisting of 6 no antenna, 2 no 300mm dishes and 3 no cabinets along with ancillary development thereto on the rooftop of Lowlands Court.

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This replacement site is required to fundamentally allow the operator Telefonica to maintain high quality 2G, 3G, 4G as well as providing new 5G services to the surrounding area.

The equipment has been designed so that it resembles as closely as possible other items of rooftop infrastructure which are commonly found within an urban streetscene.

Lowlands Court is a relatively modern five storey building. The building mass of Lowlands Court will ensure that the antennas will not be overly visible from ground level.

The operator has chosen this building as it is as near as possible to the original building that provided high quality, advanced communications technology but is no longer available to be used. In order to provide equivalent replacement coverage, the replacement site needs to be as close as possible to the former site, so it can fill the specific hole in coverage in the operator's network.

Utilising an existing building is in complete accordance with national planning guidance as the number of base stations has been kept to a minimum and the proposed antennas are out of the general eye line of the casual onlooker. Thus, the visual presence of the radio base station will be minimised. This is especially so as the height of the host building's main roof is 14.6m. The top height of the antennas is 20.60m. The area is already established with rooftop antennas on nearby buildings. The proposed antennas will appear very similar to these. The building mass of the Lowlands Court and significant number of street trees will also ensure that the antennas will not be overly visible from ground level.

The proposed rooftop antennas will be grouped into three areas of the rooftop on the north west, south east and south west corners of the plant room on the building roof. The antennas will be fixed to steel tripods. Adjacent to the antennas are the transmission dishes.

The transmission dishes will be 0.3m in diameter. Transmission dishes require a clear line of sight to link up to the network. Otherwise the antennas would not be able to transmit their signal. Given their siting and distance above ground level they will not appear obvious in the streetscene.

The equipment cabinets are located well in from the roof edge on a lower level of the roof to the antennas. Give their maximum height is 1.800m the building mass of the host property will ensure that they will not be seen from any external vantage points.

The height and position of the antennas on the building are so that they can be justified from a technical perspective as the antennas need to clear the immediate roof so as not to create signal clipping and reflection. The height of a proposed antenna has to be offset against its positions on the roof, whereby the closer to the centre of the roof of the building the more height that is needed to clear the immediate roof space in front of the antenna. Furthermore, the additional height is required in order to avoid ICNIRP issues, which would sterilise a large part of the rooftop at lower levels. The antennas enable the operators to provide the multiple technologies and meet their full coverage requirements to the target area within the permitted ICNIRP guidelines.

Furthermore, if the antennas were to be any lower, they would be blocked from obtaining a clear line of sight and therefore would not be able to operate effectively reducing the ability of the antennas to provide 3G, 4G and 5G coverage to the immediate area.

The height is a direct requirement due to the fact that the taller a site the further it can send signal and this negates the need for additional sites to pick up the shortfall.

A number of alternative designs have been considered as set out below:

Reduce antenna numbers	Due to the technical requirements for Telefonica, the number of antennas cannot be reduced. 6 no antennas

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	are needed here to maintain existing 2G, 3G and 4G coverage as well as provide new 5G services for Telefonica, thus a reduction in antenna numbers is not possible.
Face mounted antenna	The antennas cannot be face mounted on Lowlands Court due to the location of the windows.
GRP Enclosures	Locating antenna in a GRP enclosures would require an increase in height. It is considered that a GRP solution would be highly visible and prominent in the street scene.
Use of smaller antennas:	The proposed antennas are 2.1m high. A top height of 20.60m to meet coverage requirements. It is not possible to use shorter antenna due to the additional frequencies that are now required to continue to provide the latest technologies and increased demand for mobile connectivity service that has been generated over the years. For example, shorter antennas would not provide the necessary latest 4G and new 5G technologies. In effect, shorter antennas would not provide all the necessary service provision to the surrounding area that customers have come to expect to be available whenever and wherever especially in this high density, busy part of the operators network.

The technical requirements of mobile communication operators such as the applicant are acknowledged in the National Planning Policy Framework which states that local planning authorities should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.

Placing masts near similar structures and utilising simple and unfussy designs is acknowledged in the 'Code of Best Practice on Mobile Network Development in England' to be less likely to dominate and be in discord with the landscape and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area. This design is considered to be an appropriate solution and shows the applicants efforts to help mitigate the proposals impact on the visual amenity, whilst also ensuring that proliferation of masts is reduced by the utilisation of existing structures as outlined within NPPF. One of the fundamental aspects of the NPPF is a reduction in the proliferation of sites.

As noted above NPPF advises "*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*".

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design of the equipment represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site. Taking all matters into account it is considered that this proposal to deliver the capability for new services for Telefónica, would not appear out of place within the street scene.

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Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, Telefonica UK Ltd operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of Telefonica UK Ltd's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.	Yes	No

4. Technical Justification

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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

Reason(s) why site required e.g. coverage, upgrade, capacity:
A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are. As already explained, as part of Telefonica's continued network improvement program, there is a specific requirement for a replacement rooftop installation at Lowlands Court to replace the nearby radio base station at Britannia House. The site provider of Britannia House served the operator with a notice to quit. The original site will be decommissioned and taken off air. There will be therefore no coverage for Telefonica in this busy location within the capital. There is therefore an urgent need to provide replacement coverage as soon as possible, as the operator's customers will be unable to utilize their handheld devices in this cell area contrary to the operator's legal requirements to provide a service and the customers reasons for purchasing their handheld devices. A replacement installation in this location will ensure that the latest high quality 2G, 3G, 4G service provision is maintained and enhanced in and around Eton Avenue as well as the provision of new 5G services. The National Planning Policy Framework states that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt as set out below this new site is needed for Telefonica to maintain their existing 2G/3G/4G services as well as providing new 5G services. Coverage maps are a useful tool for establishing network coverage in an area. They are developed using assumptions regarding the handset use, expected level of call reliability and signal loss within a vehicle or a building. However, plots only tell part of the story as even when the coverage plots provided show good coverage in an area there may still be a requirement to improve capacity and as such local network services. Coverage plots show coverage issues only; they cannot show capacity issues. Notably, coverage plots cannot illustrate the capacity of the site which the surrounding sites are not designed to service. The term 'capacity' refers to the fact that each base station can only provide services to a certain number of users at any one time. When this 'Capacity' is exceeded, although 'Coverage' remains present, the base station cannot provide service to any further users and calls/text/data usage would be unavailable. This is contrary to the purposes in which the operator's customers purchased their handheld devices as well as the Government's latest thinking that everyone should have access to the information superhighway wherever they are. Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. In addition, fact sheets on Radio Planning and Propagation have been attached to this application

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for reference. This information is provided to assist the local authority in understanding any technical constraints on the location of the proposed development.

5. Site Selection Process

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	Site Name, Address, NGR, Site Type	Reason for not Choosing
ETS	Hampstead Britannia Hotel, Fellows Road, London, NW3 3LU (E527527 N184428)	The existing host rooftop cannot be utilised due to the freeholders plans for redevelopment which include the rooftop space.
SW	Englands Lane, by Bus Stop, London, NW3 4TG (E527570 N184632)	It is not possible to install a street furniture installation at this location due to unresolvable underground services in order to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.
SW	Primrose Hill Road, Adelaide Road, London, NW3 3SG (E527509 N184334)	A mast at this location would not provide the required level of coverage to the target area due the substantial tree cover that would inhibit the signal and would not deliver the required coverage to the target area. This site has therefore been discounted for this reason.
SW	Primrose Hill Road, Maitland Park, London, NW3 3AD (E527529 N184298)	The footway at this location is too narrow to accommodate the operator's equipment. As such, it would lead to highway safety issues. A site in this location has therefore been discounted for this reason
RT	Whitton, Primrose Hill Road, London, NW1 8XD (E527593 N184162)	An installation at this location is located too far to the South to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.

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

N/A

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

No specific environmental considerations identified to date.

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

The site is within Belsize Park Conservation Area.

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

In the first instance, all correspondence should be directed to the agent.

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National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Policy Framework (July 2021)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. In July 2021 the NPPF was revised again. Overall, it's been revised to strengthen other sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 114 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of reliable communications infrastructure for both economic growth *and social well-being*.

The NPPF continues to support the expansion of electronic communications networks at paragraph 114. It notes that policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF makes reference to 5G:

'*Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)…*'

With the above in mind, the Government is already forward thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

Paragraph 115 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 118 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

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At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 38 it states that:

*'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including…*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'.*

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 81 states:

> *'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation[42]'…*

Footnote 42 of the NPPF states:

'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'.

The NPPF provides guidance on proposals affecting heritage assets. Paragraph 194 states that '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.

Paragraph 195 goes on to state that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset).

The NPPF goes on to provide guidance on considering the potential impacts of development on heritage assets. Paragraph 199 states that 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. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

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Paragraph 202 retains advice provided in the 2012 version of NPPF relating to the degree of harm. It states that '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.

Public benefits are defined within the NPPG and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

The proposed development accords with all these aspects of the NPPF in that it will provide Telefonica with continued and improved network provision within this area of London bringing a range of associated economic and technical benefits.

In order for the UK to benefit from the huge potential of 5G Local Planning Authorities will have to weigh the Public Benefits of such connectivity with the requirements to instruct and manage the built environment. Central Government understands that this may present concerns with the various design solutions proposed but it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. This is further emphasized within the National Infrastructure Commission's report in 2016, where National Digital Strategy will be directed through the Economy and Industrial Strategy Cabinet Committee in order to:

"Support and challenge local government in their plans to enable the delivery of digital infrastructure; both in terms of ensuring that these plans help the UK to meet its national objectives, and that local authorities develop consistent approaches to support the deployment of mobile infrastructure across the country". 'Connected Future', National Infrastructure Commission 2016.

Code of Best Practice on Mobile Network Development in England (24 November 2016)

The Code of Best Practice has been fully revised in November 2016 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information super highway no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2013).

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development.

Section 2 of the Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that the continued expansion and development of mobile networks is a key element of the National Infrastructure Delivery Plan 2016 – 2021. This recognises that digital communications are now a crucial component of everyday life, with improvements in connectivity being key to a vibrant economy (para 2.1).

Paragraph 2.2 goes on to state that consumers, businesses and public bodies increasingly rely on mobile communications and expect to receive a signal wherever they are. The Code indicates that recent changes in planning policy [and regulation] are intended to align with Government

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communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed. Section 2 of this Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth.

Section 3 of this Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that there remains a reliance on radio masts to provide the main umbrella of coverage. Paragraph 3.1 explains that radio signals operate like light and must "see" over the target coverage area, they cannot be hidden and so there will always be a degree of visual impact.

Paragraph 3.2 clearly indicates that in assessing the visual impact, greater emphasis than previously should now be placed on the radio planning requirements to achieve mobile coverage (as shown in the recent changes to permitted development rights, at the end of November 2016, and the reduced test in the most recent NPPF.

Paragraph 3.3 goes on to highlight that the [operator systems tend to be demand-led or to fulfil coverage obligations. With the ever increasing demand for data hungry applications available to a range of connected devices, such as smart phones and tablets, the requirement to upgrade and improve networks through changes to existing sites and the development of new sites is constant. As most parts of the country move on to a superfast highway, so the need to bring coverage to 'not spots' and improve coverage in 'partial not spots' intensifies.

Paragraph 3.4 of The Code provides advice to local Planning authorities who are concerned about proposals, stating that they should not 'look for problems' but should work proactively with the Mobile Network Operators to find solutions, in line with paragraph 187 of the NPPF.

Paragraph 4.1 of the Code acknowledges that customer expectations have evolved with technology. The expectation is that they will always be connected and able to access services in exactly the same way as fixed broadband for personal, educational and business purposes.

Paragraph 4.2 acknowledges that data, i.e. using the internet, puts increased demand on capacity and therefore the need for additional base stations to keep abreast of customer demand. However, changes in working practices for the operators, in line with national guidance, streamlining networks, sharing base stations has reduced the overall amount of infrastructure required.

The Code goes on to acknowledge that operators maximise the use of their existing network infrastructure for the provision of 4G services and are similarly upgrading their 3G network infrastructure to improve capacity and coverage. However, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity needs to be enhanced in line with Government commitments and customer demand.

Similarly, some new sites will be required to replace existing sites that are lost, for example, through redevelopment of an existing building. Some masts may need to be redeveloped or replaced to enable an upgrade in services to take place.

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Section 5 relates to mobile connectivity in the 21st Century, explaining that mobile phones and other devices are now everywhere. Mobile connectivity is not just making calls and texts but also mobile broadband. The majority of mobile phones in the UK are Internet-enabled smartphones and large numbers of people also now own tablet devices. People are increasingly choosing to access the internet using a mobile device even when they have fixed broadband connection available.

The Code acknowledges that by the second decade of the 21st Century, the greatest increase in traffic across mobile networks was in data i.e. internet use (para 5.3). Paragraph 5.4 states that in terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5% in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade.

Section 5 of the Code goes on to highlight that connectivity promotes social inclusion. In recent years, more people rely on a mobile phone than they rely on a landline. Furthermore, people on lower incomes are even more likely to live in a mobile only household, or to access the Internet using a mobile connection (para 5.5).

The Code illustrates that mobile connectivity helps in the delivery of public services e.g. to access Central and Local Government via online services, acknowledging that lives are more likely to be saved when a 999 call is made from a mobile than from a landline, Telehealth is becoming increasingly important and text message reminders also improve compliance with medication and keeping NHS appointments.

Good mobile connectivity also promotes sustainability e.g. it reduces the need to travel and thus carbon emissions (para 5.7). The Code continues to support mobile telecommunications network as it is seen as a crucial piece of national infrastructure in economic, community and social terms (para 5.8).

Paragraph 5.9 states that there is a need to continually upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely. This is driven by increasing consumer demand for data, improved connectivity and more capacity, together with Government aspirations for improving connectivity and coverage.

The Code provides guidance on siting and appearance principles at Appendix A. It sets out a number of design principles in respect of telecommunications development. However, the code acknowledges that the options for design used by an operator will be affected by site conditions including requirement to link the site to the network, landscape features and coverage and capacity requirements. The main options for the operator include:

- Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator);
- Installation on existing buildings and structures;
- Erecting new ground based masts;
- Camouflaging or disguising equipment where appropriate;
- Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage).

The Code in Appendix A acknowledges that it has been a long standing Government policy objective to support the sharing of masts and sites. Operators also aim to site share wherever viable.

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Concerning the erection of new ground based masts; The Code at Appendix A page 27 provides examples of where the environmental and visual impact of the mast can be greatly reduced.

- Placing the mast near similar structures. For example, industrial and commercial premises, road signs and lamp posts;
- Placing a mast within or adjacent to an existing group of trees. This option is more successfully implemented in or near wooded areas. It should also be noted that the top of the mast placed in trees will need to be above the tree-line in order for the equipment to work for the allowance of future tree growth;
- Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts, and
- Appropriate colouring. Masts seen against the sky are best left in their galvanised state or painted pale grey. Against a wooded backdrop, a matt green or brown colour scheme would be more applicable.

The Code continues to support sympathetic design and camouflaging including concealing antennas in familiar features such as flagpoles, street lamp posts, telegraph pole style designs and signs.

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

The Local Plan for the area comprises:

- The London Plan (Adopted 2021)
- Camden Local Plan (2017)

The London Plan 2021

The London Plan 2021 is the new Spatial Development Strategy for Greater London and was adopted in March 2021 and is now part of the statutory development plan. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. Chapter 1 of the London Plan deals with 'Planning London's Future - Good Growth'. Para.1.0.1 relates to 'Good Growth' that is "*socially and economically inclusive and environmentally sustainable and underpins the whole of the London Plan and each policy. It is the way in which sustainable development in London is to be achieved*".

Para 1.1.4 under 'Building Strong & Inclusive Communities' includes: '… *social, physical and environmental infrastructure that meets London's diverse needs is essential if London is to maintain and develop strong and inclusive communities.*' The corresponding policy in GG1 Building strong & inclusive communities states:

> *'Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:'*

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'… C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation
D seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city'

'I support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.'

Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities.

Para. 1.3.1 states *'The mental and physical health of Londoners is, to a large extent, determined by the environment in which they live. Transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by the planning system, and local authorities are accordingly responsible for planning and public health'*. During the Covid-19 pandemic there has been a much greater reliance on mobile digital connectivity to stay connected with family and friends and has become has enabled working from home and home-schooling. Without the infrastructure which enables reliable connectivity, we could not stay connected.

Policy GG5 relates to 'Growing a good economy. The supporting text states:

'…..London is the engine of the UK economy, accounting for more than a fifth of the country's economic output. Its labour market, housing market and transport links are interconnected with the Wider South East city region, which shapes the development of the whole of the UK. Together, London and the Wider South East contribute a full half of the country's output. London has unique strengths in specialist fields like finance, business services, technology, creative industries and law, as well as attracting tourists from around the world, providing a gateway to the rest of the UK. The wealth this generates is essential to keeping the whole country functioning, but the benefits of economic success are not shared evenly within London itself.'

'… Projected growth towards 6.9 million jobs by 2041 provides an opportunity to strengthen London's economy for the future, and doing so will depend on increasing diversification. The Central Activities Zone and Northern Isle of Dogs will remain vital to London's economic success, but growth in town centres across London will be equally important, alongside supporting local regeneration, investment in Opportunity Areas and enabling access to a wide range of jobs. Reasonably-priced, good quality employment space will be needed across London to make this happen'.

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

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GG5 'Growing a good economy' states:

To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

> *'… D ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth*
> *E ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning'*
> *'… H recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success.*"

The New London Plan creates the strongest policies ever for Digital Connectivity.

Policy S16 (with minor suggested changes) states:

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

2)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

3) meet expected demand for mobile connectivity generated by the development

3A) 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.

Para 9.6.1 states that ***'the provision of digital infrastructure is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance***. *London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. 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'(*emphasis added*)*.

The policies relating to Design (Chapter 3) and heritage conservation (policy HC1) seek to promote proposals that are of *'good design'* and are sympathetic to the heritage assets and their surroundings. The proposed replacement base station is well positioned and of a scale, appearance and shape that responds to the local context and historic assets while also acknowledging the area's social and economic needs.

Cornerstone's infrastructure and Telefónica's networks are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and shall help to implement the strategic objectives contained in the London Plan.

Camden Local Plan (2017)

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The Local Plan was adopted by the Council in 2017 and sets out policies and guidance for the development of the borough until 2031. The Council's vision for the borough is set out in the Camden Plan which also acts as the vision for the Local Plan. It states:

> *"We want to make Camden a better borough – a place where everyone has a chance to succeed and where nobody gets left behind. A place that works for everyone".*

Policy D1 relates to design and sets out the criteria against which proposals will be assessed.

The first criteria of the policy is considered relevant to the proposal and state:

> *The Council will seek to secure high quality design in development. The Council will require that development:*
> *a. respects local context and character;*

Para. 2.1 states "*Camden, along with London as a whole, is experiencing significant change, with substantial population growth and increases in demand for housing and employment*". Para. 2.2 confirms that the "*Council's objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, while ensuring that growth delivers opportunities and benefits for our residents and businesses. This plan aims to deliver sustainable growth while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit*".

Policy G1 deals with 'Delivery and location of growth'. Policy G1 sets out the conditions to create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.

The Local Plan does not have a policy that is directly relevant to the installation of telecommunications in the Borough. However paragraph 5.10 'Digital Infrastructure' which is included in the supporting text for Policy E1 – 'Economic Development' states that the "*Council recognises the importance of digital infrastructure including telecommunications*". Indeed recognising the importance of Digital Connectivity, the Mayor for London through the Greater London Borough Authorities has amended planning application forms in order to monitor 'Mobile Connectivity' and the implementation of London Plan Policy SI 6, in order to help avoid recurring situations like this one at the application site is to help rectify.

Paragraph 2.6 of the Local Plan sets out key priorities for delivering growth and harnessing its benefits which include:

> *Securing the infrastructure and services to meet the needs of our growing number of residents, workers and visitors.*

The paragraph goes onto state that this includes '*digital infrastructure*'.

Appendix 1 sets out the infrastructure that is required to deliver the Local Plan. Item 66 deals with digital connectivity and the relevant project/programme is to result in:

> *"Improved internet access through the acceleration of high-speed connectivity, including public wireless systems".*

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Policy D2 entitled Heritage states:

> *"The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets."*

The policy has specific section on conservation areas which states:

> In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.
>
> The Council will:
> e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
> f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
> g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
> h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

Camden Planning Guidance Digital Infrastructure (March 2018)

The planning guidance document is intended to support the policies of the Local Plan, including Policy E1, to assist with '*delivering growth and harnessing Sits benefits'* by '*securing infrastructure and services to meet the needs of Camden's growing numbers of residents, workers and visitors'*, aiming to '*enable improved internet access through the acceleration of high speed connectivity…*'.and is a material consideration in determining planning applications.

The first and fourth key messages are particularly relevant to the proposed reinstatement of critical infrastructure development and state:

- *The Council will support the expansion of electronic communications networks, including telecommunications and high-speed broadband*
- *The Council will require applications for telecommunications development to be supported by the necessary evidence to justify the proposed development.*

Digital Camden (2014)

The strategy was published in 2014 and sets out a series of actions to support the uptake of high quality, next generation connectivity. It prioritised '*creating the conditions for and harnessing the benefits of economic growth*' including '*stimulate an expansion of high-speed internet access across the Borough…*'.

Having a digital strategy in 2014 shows that wider Camden Council was a leading proponent of the UK Government's Digital Strategy initiative, and understood even then the economic benefit of good quality communications services.

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This was detailed in the document UK Digital Strategy A new approach to digital change for our borough (2016), in which Camden set out '*We believe it's about enabling the transformation of government, business and society for the better*.' Under the Unlocking Growth recommendations for the UK Digital Strategy Recommendation 6: '*The UK Digital Strategy needs to continue focusing on accelerating superfast connectivity which is particularly poor within inner London as well as incubating the rollout of next generation mobile and telecommunications connectivity to enable ubiquitous access to the internet and greater competition. Central and local public service estate should be used to boost connectivity, following Camden's 'digital rooftops' initiative.*' With regard to Smart Cities, it says '*Alongside this a whole new wave of service innovation is being driven through the digitisation of our lives with cars, health monitors and mobile phones providing vast amounts of information that offer fundamentally different and disruptive ways of delivering services.*'

Camden Planning Guidance 'Design'

The planning guidance document is intended to support the policies of the Local Plan and is a material consideration in determining planning applications. However, this guidance has less weight than the Local Plan or other adopted development plan documents. The guidance states that it does not specifically apply to telecommunications as they are considered in other guidance.

The guidance has not been written with specialist telecoms infrastructure in mind and the design of the proposed equipment cannot be altered due to the technical requirements. The antennas have been positioned on the building to enable their effective operation, and have been set back from the roof edge at the lowest possible height to minimise their appearance.

Camden Planning Guidance 'Amenity'

The planning guidance document is intended to support the policies of the Local Plan and is a material consideration in determining planning applications but makes no reference to telecommunications.

The section on outlook is the only section that can relate to the proposed development and states:

> *"Outlook is the visual amenity enjoyed by occupants when looking out of their windows or from their garden. How pleasant an outlook is depends on what is being viewed. For example, an outlook onto amenity space is more pleasant than an outlook across a servicing yard. Particular care should therefore be taken if the proposed development adjoins properties with a single aspect. Any unpleasant features should be screened if possible, for example with permanent landscaping.*
>
> *Developments should ensure that the proximity, size or cumulative effect of any structures avoids having an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers. The location of bin or cycle stores, for example, should be carefully considered if they are in close proximity to windows or spaces used by occupiers.*
>
> *It should be noted that the specific view from a property is not protected as this is not a material planning consideration".*

Planning Issues

The main issue arising from this full planning application is the impact on Belsize Park Conservation Area and whether the proposed base station would be a visually obtrusive feature which would be

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detrimental to the character and appearance of the area. Whether any perceived harm would outweigh the significant social and economic benefits associated with the replacement service provision attributed to the proposal and other void material considerations as outlined in the NPPF, the London Plan and the Local Plan.

Siting and Appearance:

The height and position of the antennas on the building are so that they can be justified from a technical perspective as the antennas need to clear the immediate roof so as not to create signal clipping and reflection. The height of a proposed antenna has to be offset against its positions on the roof, whereby the closer to the centre of the roof of the building the more height that is needed to clear the immediate roof space in front of the antenna. Furthermore, the additional height is required in order to avoid ICNIRP issues, which would sterilise a large part of the rooftop at lower levels. The antennas enable the operator to provide the multiple technologies and meet their full coverage requirements to the target area within the permitted ICNIRP guidelines. As such, they have been designed and sited to minimise the visual impact on the character and appearance of the area.

This is a well-considered design, which conforms specifically to NPPF, the London Plan and the Local Plan. However, it is notable that the Local Plan policies relate to the design of the development, which should take in to account the local context and character. However, the Council's local policies are not designed to meet the particular requirements of the local need to maintain and expand the mobile phone network. Indeed, national guidance fully supports high quality communication infrastructure.

Telecommunications antennas are essential infrastructure to enable the mobile network to function. Similarly, plant rooms and air conditioning units are essential infrastructure but will not necessarily create places that are locally distinctive, people friendly, nor improve the built character and quality of an area and the way it functions. Indeed, few if any essential rooftop infrastructure in the vicinity of the site enhance the character, quality or function of the area.

The installation of 6 no. antennas designed to be as similar as possible to other roof top infrastructure found in the area, will be no more at odds with the streetscene and character of the area than other existing equipment located on rooftops such as plant rooms and air conditioning units.

It is accepted that the height of the proposed installation is taller than the main roof level of the host building. Telecommunications apparatus by its very nature must be taller than surrounding built and natural form to ensure its efficient operation.

Reasonable consideration of the proposal in the context of the existing plant and adjacent rooftops can only conclude that the presence of other rooftop equipment in the immediate area only seeks to provide a setting wherein a base station may appear more congruous from which to provide an important service to a wider area.

Maintaining and enhancing Telefonica's existing communications networks with new 5G services is essential for sustainable economic growth, as acknowledged by the NPPF, the London plan and policy E1 of the Local Plan. Mobile communications network development also plays a vital role in supporting London's successful service-based industries which increasingly depend upon infrastructure facilitating rapid transfer of information and which contributes to wider planning objectives such as reducing congestion. The proposals are therefore considered to be in full accordance with the London Plan, and Policy E1 of the Local Plan.

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The design of the radio base station is one of the most sensitive designs available to the operators, designed to resemble typical rooftop infrastructure and urban street furniture. This is in line with the requirements of NPPF which supports equipment which is sympathetically designed and camouflaged where appropriate [paragraph 115], The Code of Best Practice as well as the aspirations of the London and Local Plan.

Whilst the site is located in the Belsize Park Conservation Area, the proposed new site accords with NPPF because the equipment will resemble other roof based structures within the area and will ensure high quality communications infrastructure is maintained in the area. Placing masts near similar structures such as air-conditioning units, roof based plant and utilising simple and unfussy designs is acknowledged in the Code of Best Practice on Mobile Network Development in England to be less likely to dominate and be in discord with the street scene and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area. The building mass of the Lowlands Court and significant number of street trees will also ensure that the antennas will not be overly visible from ground level. An alternative design would only serve to draw attention to the installation and inflict unnecessary harm on the historic context of the area. The siting of the base station at Lowlands Court will have minimal impact on the setting of the Belsize Park Conservation Area. This is in line with the NPPF, the Code of Best Practice the London Plan and the Local Plan

5G Coverage – Material Consideration

Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work.

Without this replacement radio base station 5G will not be rolled out in the area. If the 5G network is not available then the customers' would not be able to utilise these handheld devices for the purposes in which they were purchased.

At present, during the COVID 19 pandemic it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centres and places of work to residential areas and suburbs requires an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides such additional capacity to the network whilst still promoting the improved 4G technology and new 5G technology.

The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

The Code of Best Practice acknowledges that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which we rely. With increasing consumer demand and the Government's aspirations for high quality communications infrastructure it is ever more important to improve connectivity and capacity.

It must also be noted that the Council's Planning Guidance on digital infrastructure supports the expansion of electronic communications networks including telecommunications and high speed broadband.

Economic and Social Benefits

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When telecommunications proposals are considered, it is necessary to carry out the balancing exercise weighing the need for development and the magnitude of public benefits of the proposed base station against the perceived concerns about the development's visual impact and availability of alternative locations and the possibility to design the scheme differently without impacting the operational needs of the operators.

As has already been presented, there is a clear and demonstrable need for a replacement radio base station in the area.

The NPPF strongly supports sustainable development as does the London Plan and the Council's Local Plan. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with the NPPF, the London Plan and the Council's Local Plan to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

There have been numerous appeal decisions where the Inspector has attached significant weight to the benefits, alternative options, technical constraints and NPPF in a balancing exercise of all the valid material considerations, including visual impacts and the impact on residential amenity.

It is therefore clear that the Government places significant importance on reliable communications and as such the Planning Inspectorate gives significant weight to the public benefit arising from local service provision. The issue of benefits and planning balance is considered in Appeal Ref: APP/L1765/W/18/3197522 Land at junction of Andover Road and Athelsan Road, Winchester. The proposal related to the installation of a 17.5m street works pole and associated equipment cabinet at land at the junction of Andover Road and Athelstan Road, Winchester.

The Inspector found at Paragraph 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". In this instance, the proposal is not so much seeking to provide significantly higher standards but to maintain recent local provision of 2G, 3G and 4G services as a result of a notice to quit from a nearby site that was providing these services. The Council has commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision'*.

The issue of benefits and planning balance was also considered in Appeal Ref: APP/X5990/W/16/3162918, 55 – 59 Oxford Street, London, W1D 2EQ. The Inspector found at Paragraph 20:

'*Whilst I have paid special attention to the desirability of preserving or enhancing the character and appearance of the conservation area, the above factors lead me to conclude that there is less than*

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substantial harm to the character and appearance of the existing building and the Soho Conservation Area'.

The proposal related to the installation of 9 no antenna inside a 'replica' GRP extension to the plant room. Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

There is a demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all 3, make it difficult. Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.

Paragraph 38 of the revised NPPF states that:

'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including...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'*.

Maintaining high quality 2G, 3G and 4G coverage and capacity as well as providing new 5G technology in this area fully meet this part of the NPPF. The social and economic benefits are a significant material consideration which should be weighed against the visual impact associated with a radio base station in this location. HM Treasury outlined such benefits in its report '*Fixing the Foundations: Creating a More Prosperous Nation*' – July 2015. Paragraph 7.1 of the plan stated that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

Paragraph 7.2 goes on to highlight strong support for high quality communications infrastructure. It states

'*by reducing red tape and barriers to investment, the Government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The Government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published March, of near universal 4G and ultrafast broadband coverage.*'

Indeed, MPs have noted in parliament that the UKs Superfast Broadband connectivity was 'relatively poor'. As such, there is continuing and growing strong national support for high quality communications infrastructure. Further to the Government's commitment to improve connectivity, on 24th November 2016 the new permitted development rights for telecommunication operators came into force, designed to lift the restrictions on mobile operators such is the significance and weight the Government place upon the benefits attached to modern connectivity.

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In October 2016, there was also the BIG Infrastructure Group (as Chaired by MP Grant Shapps) Report release calling on operators to improve their network. This is signed and has comments from numerous MP's nationally.

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016 (https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs- assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx). It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global market place. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases'.

The Assessment goes on to note that '*Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy*'. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of providing new 5G services to this very busy area of the capital, where the social and economic benefits outweighed the environmental considerations.

Ministers from the DCMS and MHCLG wrote to all CEOs of Council's in England (March 2019) setting out its position in respect of supporting investment in high-quality, reliable digital connectivity. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers state:

'It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As outlined in the Future Telecoms Infrastructure Review, the Government would like to see nationwide full fibre coverage by 2033. We would also like the UK to be a world leader in 5G, with the majority of the population covered by a 5G signal by 2027. We are writing to ask for your help in supporting the investment necessary to achieve these objectives.

Recent years have seen substantial investment in mobile and fixed digital infrastructure across the UK.

While mobile coverage across the UK has been significantly improving, there are still too many areas where coverage is poor. The UK has now achieved 95% superfast broadband coverage but still only 6% full fibre coverage.

We need to create the market and policy conditions necessary to support the large-scale commercial investment required to extend and future-proof digital connectivity. A key part of this is making it easier for operators to deploy infrastructure. To help to achieve this, the Government recently reformed the Electronic Communications Code - the statutory framework which underpins agreements between communications network providers and those in both the private and public sector who can provide sites for the installation of network equipment. The purpose of the reforms was to make it easier and more cost effective for communications network providers to deploy and maintain digital infrastructure.

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Local authorities have an essential role to play as site providers. As Chief Executives, you can support investment in digital communications infrastructure by ensuring your organisations have policies and procedures in place that promote effective engagement with the digital communications industry and minimise barriers to deployment'.

The radio base station installation in this location will allow Telefonica to provide 5G mobile communications supporting the Government's aim of '*focusing on ensuring that everyone is connected to the information superhighway*'. This fully meets the aspirations of the NPPF, the London Plan and the Council's Local Plan in general terms, its vision to provide a place where everyone has the chance to succeed.

At present, during the COVID 19 pandemic it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centres and places of work to residential areas and suburbs requires an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides such additional capacity to the network whilst still promoting 5G technology.

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 (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.

The Centre of Policy Studies launched a new report entitled: '*Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution' as part of the* 'Speed up Britain campaign. The report identifies what the 5G opportunities are for us and what the Government needs to do so we can all benefit from this vital new technology. The report notes

'Delays to the rollout of 5G could cost the country tens of billions of pounds in lost economic output, according to a new report by the Centre for Policy Studies. In the CPS report 'Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution', former Government advisers Alex Jackman and

Nick King argue that Government's 'levelling up' agenda and the UK's recovery from the Covid-19 pandemic is at risk without a faster 5G rollout – to the tune of £41 billion.

The delivery of 5G infrastructure is stalling. The set of rules meant to pave the way for the smooth rollout of the next generation telecommunication network, the Electronic Communications Code, is clearly not working as intended. Pressure on the rollout will only increase with the phasing out of Huawei from 5G infrastructure by 2027.

The report highlights that if delays continue at their current rate, by 2027, over 11 million households and businesses could be missing out on vital digital connectivity. Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities. However, without reform to existing legislation, millions of households and businesses will suffer.

Using analysis by the independent consultancy Policy Points, the report estimates that if 5G coverage reaches a quarter more of the population than the Government's current target of 51%, it will produce GDP gains of £41.7 billion by 2027. It highlights that the difference between the UK being a leader and a laggard in 5G adoption could be as much as £173 billion in incremental GDP over the coming decade, as estimated by the Future Communications Challenge Group.

The manufacturing, construction and agricultural sectors have been hit particularly hard by the pandemic, and these would benefit significantly from improved connectivity. However, onerous planning rules and loopholes in existing legislation are slowing down the infrastructure upgrades needed to make the most of this mobile revolution in these much-needed industries.

To overcome these deployment barriers, Jackman and King are calling for urgent reforms to the Electronic Communications Code and national planning rules to speed up the rollout of 5G, unlock its potential and stimulate growth as the country recovers from the economic impact of Covid-19. It calls for sustained public sector leadership to deliver this, recognising that supporting digital infrastructure is one of the key things the Government can do that costs little, boosts growth and helps 'level up' the UK.

The report warns that without such efforts, the UK could miss its 2025 deadline for gigabit connectivity and 2027 target for 5G coverage, putting the potential economic gains at risk. It argues that policymakers must learn from the 4G rollout and remove the barriers to deployment. While 5G promises to create economic benefits through increased capacity, reliability and speed - vastly improving business productivity and removing barriers imposed by poor digital connectivity - the system is plagued by red tape'.

Report author, Alex Jackman, former digital adviser to the Government, said:

"Digital networks and the services they support have underpinned our resilience to Covid-19 and they will drive our recovery. By expanding them, we deliver not only immediate benefits but also the essential foundation stone for 5G. This is no time for the government to be passive on the deployment environment - the difference between the UK as a 5G pioneer and ceding leadership to others is as much as £173bn".

"Productivity gains to business, equality gains for regions and economic gains for the country are only as achievable as the networks we can access."

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The Rt Hon Patricia Hewitt, Speed up Britain's Campaign Chair, said:

"There aren't many low-cost ways to unlock serious economic growth, but small changes to the Electronic Communication Code could unlock billions of pounds in our economy, drive the UK's COVID-19 recovery, and deliver significant regional growth.

"All parts of the UK can benefit from this fantastic technology – but the Government needs to act now to avoid being left behind in the digital revolution."

Minister for Digital Infrastructure, Matt Warman said:

"It is our national mission to futureproof the UK's networks with revolutionary 5G technology. Thanks to government and industry action 5G is available in more than 70 towns and cities.

"Alongside record amounts of funding, we are exploring how to bust any barriers holding back industry from speeding up rollout. We've committed to reforming planning law and to consult on whether further reforms to the Electronic Communications Code are needed and will consider the points raised in this report carefully."

It is therefore considered that the wider public benefits ensuing from the installation on an existing building will far outweigh the very limited harm to the conservation area.

Health and Safety

The proposed installation conforms to current government planning guidelines regarding potential health effects arising from telecommunications development. The operators have attached a declaration that the site conforms to ICNIRP guidance. This is in full accordance with NPPF.

Recent court cases have confirmed that the *public perception* of health risks can be a material consideration within the land-use planning system. The weight to be attached to this issue has to be determined accordingly in each case by the decision maker. It has been generally held, and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed installation will comply with the ICNIRP guidelines.

The publication of the National Planning Policy Framework continues to highlight the Governments view that the planning system is not the appropriate mechanism for determining health safeguards. It sends a clear message to local planning authorities stating that they must '<u>determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure'.</u> *This is reiterated in the Code of Best Practice.*

In this instance, Telefonica believe that it is not necessary to consider health effects further, as recommended by NPPF. The operator is committed to ensuring that all new and existing installations are ICNIRP compliant, and consequently it is considered that there is no basis for this application to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. ICNIRP compliance certificates are enclosed for the operators with this application. If required, additional information regarding the operation of mobile telephone base stations and health and safety considerations can be provided.

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Summary

The following conclusions have been reached:

Cornerstone and Telefonica are in the process of progressing a suitable replacement site in the Eton Avenue area for a radio base station. As part of Telefonica's continued network improvement program, there is a specific requirement for a replacement installation at this location to provide equivalent and improved 2G, 3G and 4G coverage and capacity as well as new 5G services ensuring that this area of Eton Avenue maintains access to the latest technologies.

It has been demonstrated that the proposed scheme is in full accordance with the NPPF, the London Plan and Local Plan. The very limited harm caused by the installation would not outweigh the benefits of maintaining and enhancing and providing new community facilities, and that introducing a 5G communications network in this area would bring. It has been shown that such provision is essential for sustainable economic growth and plays a vital role in enhancing the provision of local community facilities and services in full accordance with Policy S16 of the London Plan.

The proposed rooftop installation has been sympathetically designed and sited so as not to look incongruous in the streetscene and will resemble the existing rooftop infrastructure both on the host building and within the area. As such, the proposed scheme would integrate well with the existing rooftops and streetscene. The antennas as such would not result in a particularly dominant structure incongruous with its surroundings. It would not cause detrimental harm to the overall character and appearance of the host building or the conservation area.

The proposed scheme will not represent a prominent and alien feature out of character with the locality, by reason of its design, scale and siting.

It has been demonstrated that the proposed 20.60m height is the lowest possible that will allow Telefonica to maintain their existing services (2G/3G/4G) and obtain their required 5G services to the surrounding area. At lower heights, the antennas would be blocked by the rooftop.

There are no more sequentially preferable sites that would provide the required replacement 2G/3G/4G and 5G coverage to be provided that would cause less visual harm than this proposal.

Digital Infrastructure Minister Matt Warman in his Keynote Speech at 'Connected Britain 2020' provided the latest endorsement from Central Government on the importance connectivity. He stated:

"The theme this year is the future of UK connectivity. But before I talk about that, I'd like to take this opportunity to thank everyone in the industry for their tireless efforts at keeping us all connected through an unprecedented period of disruption.

You have kept school children connected with their teachers, allowed isolated grandparents to speak to their grandchildren, and enabled great British businesses to power the economy through these difficult times. Without a good connection, I would not be able to join you all at Connected Britain. Thank you.

In my speech, I am going to touch upon the exciting work that the Government is doing on broadband and 5G, and also the efforts that we are taking to make these networks more secure for the long term.

But, first, I thought that I would reflect on the changed times that we are living in. COVID has altered the way we live, work and, most importantly, stay connected with our family and friends. The digital

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Registered in England & Wales No. 08087551.
VAT No. GB142 8555 06

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infrastructure that keeps us all connected was essential to our daily way of life under lockdown - and is now more important than ever as we head into recovery. Many of these changes - such as increased working from home - will stay with us for the foreseeable future.

The Digital Infrastructure Minister Matt Warman confirmed the Government's position in respect of the importance of connectivity in is his Keynote Speech at 'Connected Britain 2020', stating:

***People in this sector have long referred to the internet as "the fourth utility" - and it's true**. For countless people across the country, having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity".*

This is in full accordance with the NPPF which states that advanced, high quality communication infrastructure is essential for sustainable economic growth.

Confirmation that submitted drawings have been checked for accuracy

Contact Details

Name: (Agent)	Helen Spoors	**Telephone**:	07930333769
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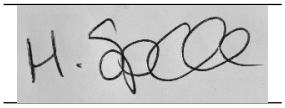
Signed:	 Consultant Planner	**Date:** **(on behalf of Cornerstone)**	01.03.2022

In the first instance, all correspondence should be directed to the agent.

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