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TELECOMMUNICATIONS INFRASTRUCTURE
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SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Anglo-Scottish	Site Address:	100a Chalk Farm Road, Chalk Farm, Camden, London, NW1 8EH.
National Grid Reference:	E: 528327 N: 184318		
Site Ref:	CMN056/25038	Site Type:[1]	Macro

2. Pre-Application Check List - Site Selection (for New Sites only)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	**No**
If no explain why: No suitable alternatives were identified. Re-use of an existing telecommunications site is the preferred option.		
Were industry site databases checked for suitable sites by the operator:	Yes	**No**
If no explain why: No suitable alternatives were identified. Re-use of an existing telecommunications site is the preferred option.		

Annual Area Wide Information to local planning authority

Date of information submission to local planning authority	**Information not available**
Name of Contact:	
Summary of any issues raised:	

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	18/10/2021
Was there pre-application contact:	
Date of pre-application contact:	N/A
Name of contact:	
Summary of outcome/Main issues raised: Request for pre-application consultation emailed to the Planning Department, no response received to date.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Amber
The site was rated as amber as although it is an existing installation, it is situated in a relatively dense residential location. Pre-application consultation letters were sent to the following people on 18th October 2021 - Councillor Alison Kelly Councillor Gail McAnena Councillor Abdul Quadir No response received to date.	

School/College

Location of site in relation to school/college *(include name of school/college):* The closest educational establishments are Haverstock School, located approximately 260m to the north west and Primrose Hill Primary School, approximately 420m south.
Outline of consultation carried out with school/college *(include evidence of consultation):* As neither establishment is in close proximity, it was considered unnecessary to consult either institution on this occasion.
Summary of outcome/Main issues raised: N/A

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?		**No**
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		**No**
Details of response:		

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	
Date served:	8th April 2022	

3.0 Proposed Development

The proposed site:

The application site is located to the north west of Camden Town in London. The proposed installation is sited on the rooftop of the Anglo-Scottish building, which houses a number of business offices. The site in question is approximately 170m south east of Chalk Farm Underground Station and approximately 410m north west of Camden Market. The immediate area is predominantly mixed-use, Chalk Farm Road consists of a row of shops with residential flats above. The wider area contains more residential uses. The existing installation has been in situ since 2013 and has been identified by the applicant as requiring upgrade in order to enable the introduction of 5G technologies to the area.

Therea are a number of listed buildings in the vicinity of the Anglo-Scottish building; the Drinking Fountain adjacent Roundhouse, Grade II, 10m north, th Cattle Trough SW of Roundhouse, Grade II, 25m north west and The Roundhouse, Grade II*, 28m west. Despite their proximity, it is not considered that any of these assets will be adversely harmed by the upgrade to this installation, which has been in situ without harm for many years.

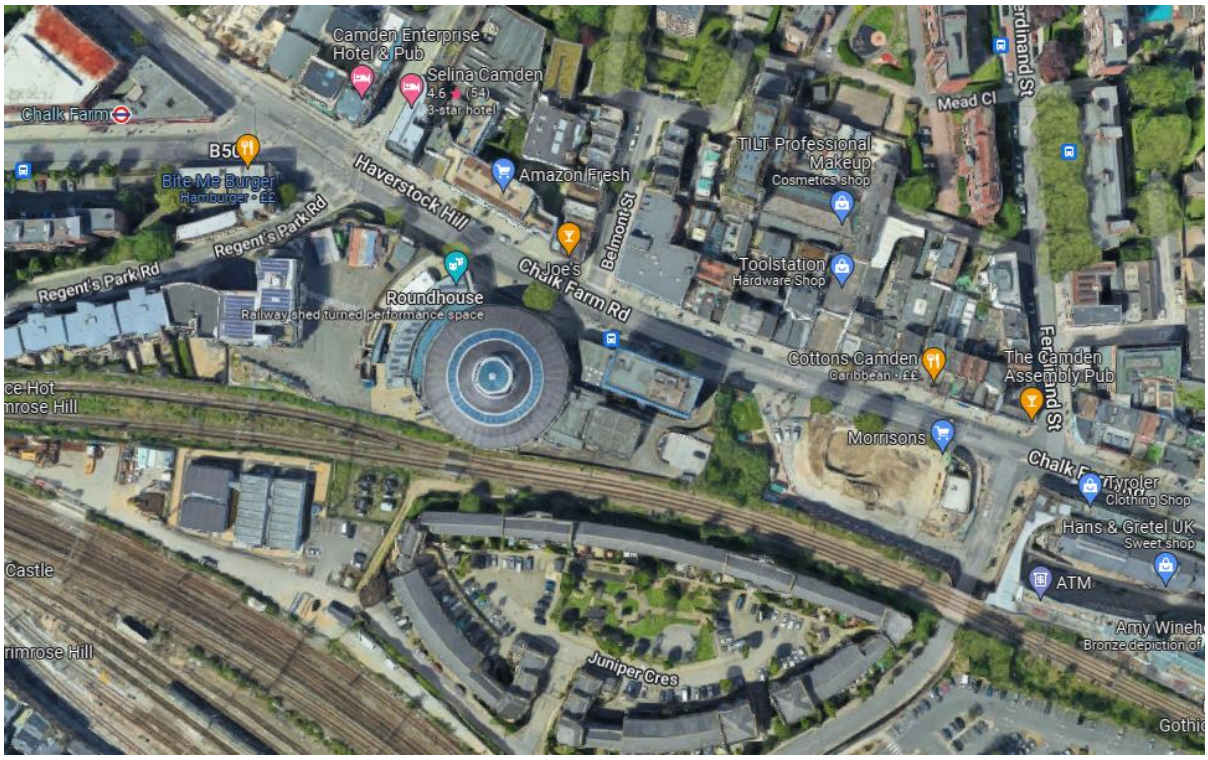
The site lies within the Regents Canal Conservation Area and the ground floor level of the building is designated as Protected Frontage. The nearest open spaces are Chalcot Square Gardens, located approximately 315m south west, Castlehaven Community Park, approximately 370m east and Talacre Gardens, approximately 370m north east. None of these areas will be affected by the development due to the intervening buildings, trees and roads.

The nearest residential properties are approximately 20m north, on the opposite side of Chalk Farm Road and 45m south on Juniper Crescent. While the applicant acknowledges that the antenna will rise above the roofline of the building, this is also the case with the existing installation. The building is five storeys tall and the development will be minimally visible from ground level. The development will be seen in the context of the surrounding streetscene, meaning that it sits as an accepted part of modern instrastructure and street furniture, now a commonly seen piece of apparatus across the UK. In addition, the monopole and cabinets will be suitably coloured in order to allow them to blend as much as possible into the background.

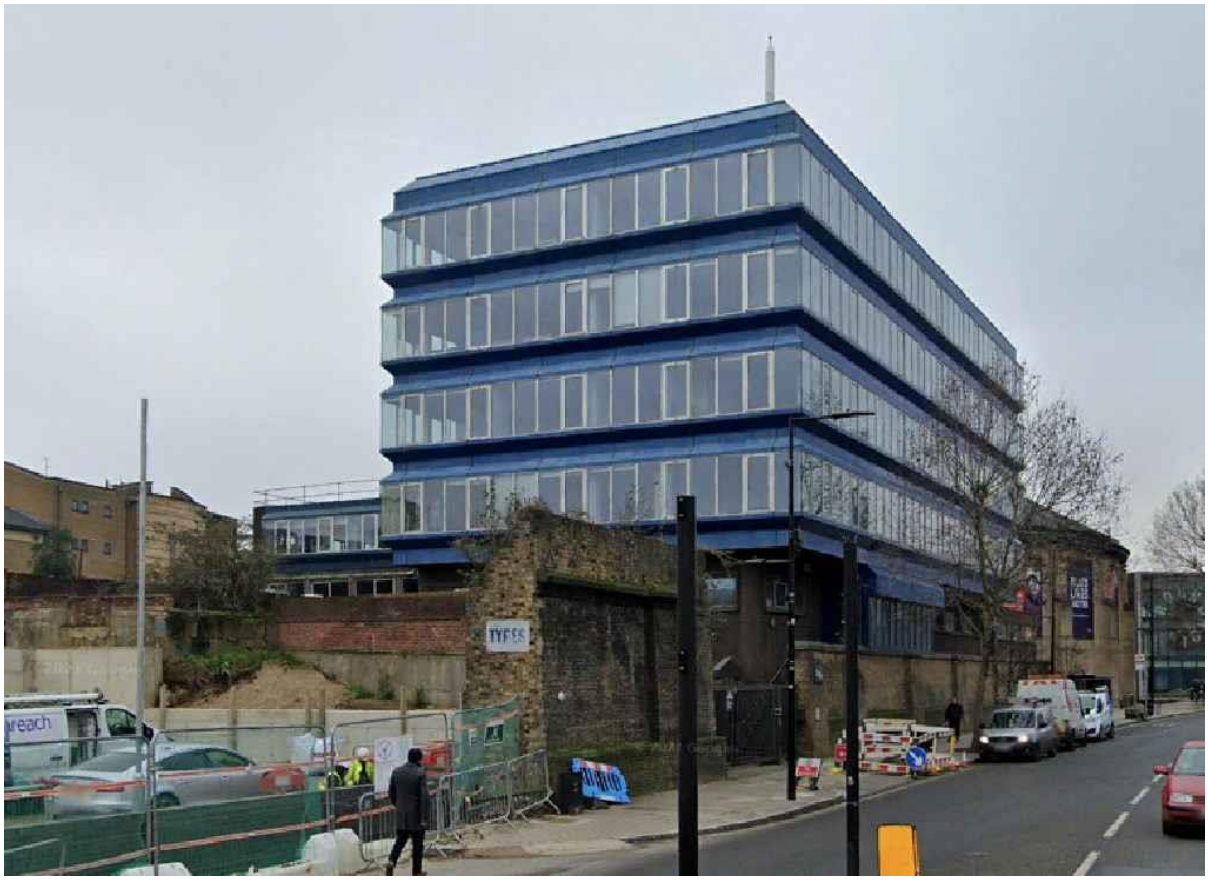
The proposed location and design are considered to provide the optimum solution in this instance, as the upgrade of this existing site will enhance the coverage of the existing 2G/3G/4G network and also implement 5G technologies providing enhanced coverage to the public and emergency services alike. The site has to fit into an existing network, this location will allow advancements in capacity and will give the opportunity for further people to work from home as well as support emergency services in receiving real time data, inevitably enhancing 2G/3G/4G communications which is imperative in times of crisis, as shown with the recent COVID-19 pandemic.

Additionally, re-use of an existing site represents the preferred option, as outlined in the NPPF discussed in further detail below.

Aerial view of site.



View of the site looking north west along Chalk Farm Road.



Planning History

2017/1103/P
Replacement of the existing flagpole antenna with a new trisector antenna, the installation of an equipment cabinet, wall-mounted amplifier units and associated works.
Full Planning granted 13-04-2017.

2016/6364/L
Increase in height of existing flagpole antenna, new flagpole antenna and associated equipment cabinets all at roof level.
Listed Building Consent withdrawn

2016/6215/P
Increase in height of existing flagpole antenna, new flagpole antenna and associated equipment cabinets all at roof level.
Full Planning refused 23-12-2016

2013/2433/P
Installation of 3 flagpole antennas and 1 telecommunications cabinet to replace 3 existing antennas and cabinet together with the erection of balustrade and ancillary works at roof level.
Full Planning granted 25-06-2013

Current Telecommunications Use/ The Future

Since the date of the above decision, mobile operator networks have been under increased pressure to provide up-to-date telecommunications functionality, as mobile phones and mobile broadband use have become increasingly essential to our daily lives. 5G is the next generation of technology to enable increased connectivity with increased data speeds. The growth of digital connectivity over the last decade and the expectations of users have advanced at an unprecedented level. The NPPF recognises that "Advanced high quality and reliable telecommunications infrastructure is essential to economic growth…" , as will be considered in more detail below. The current proposal will provide positive benefits to the community which will far outweigh any perceived negative impacts.

Enclose map showing the cell centre and adjoining cells:

The proposed development provides a solution to upgrade the existing site. The existing coverage will be maintained and the technology will be upgraded to provide 5G. It is therefore not considered necessary to provide coverage plots in this instance.

Type of Structure *(e.g. tower, mast, etc.):*	
Description: - The upgrading of the telecommunications base station located at Anglo-Scottish, 100a Chalk Farm Road, Chalk Road, Camden, London, NW1 8EH. The proposal will include the installation of 1 no. 7m trisector antenna and 1 no. GPS node alongside the removal of the existing 5m trisector antenna and any ancillary development thereto.	
Overall Height: 23.61m	
Height of existing building *(where applicable):*	16.6m
Equipment Housing:	
Length:	As per attached drawings
Width:	As per attached drawings
Height:	7.01m
Materials *(as applicable):*	

Tower/mast etc. – type of material and external colour:	**As per attached drawings**
Equipment housing – type of material and external colour:	**As per attached drawings**

Reasons for choice of design:

The mast has been specifically designed for the site in question, taking into account the existing street scene. Whilst the proposed replacement mast is taller than that which already exists, it needs to be in order to introduce the required technologies to the area. It is necessary for the height of the structure to ensure that interference is avoided, to ensure the topography of the landscape does not have an unacceptable impact upon mobile signal quality and that the structure is able to support the 5G antenna and other apparatus. The site needs to be tall enough to satisfy ICNIRP standards, if the height of the mast were to be reduced, it would not provide the levels of coverage and capacity of the existing and emerging networks/technologies.

Whilst the monopole will stand above the existing apparatus, the proposal needs to be seen in the context of the overall benefits that will occur from the introduction of 5G technologies to the area. The proposal includes the removal of the existing mast and associated redundant equipment. Furthermore, re-use of an existing telecommunications site will avoid the need for a proliferation of additional telecommunications sites in the immediate area.

The existing 5m trisector antenna and associated equipment has been in situ for a considerable amount of time without causing any undue harm to its setting. Every effort has been made in relation to the equipment associated with the installation, to keep visual intrusion to a minimum. Consideration has been taken in order to reduce the cumulative impact that a telecommunications installation in this location may have upon the vicinity.

Whilst it is acknowledged that there is an increase in the scale of telecommunications development on the site, the location of the monopole is broadly the same. In addition, the proposed site will also be seen in the context of the existing vertical structures, whilst the proposed design is considerably larger than existing street lighting columns and road signage, the height of the proposed apparatus is the minimum capable of providing the technological improvements sought. It should be noted that the new technologies will provide advanced high-quality communications infrastructure essential for economic growth as sought by the NPPF.

4.0 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. 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	**Yes**	No

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.		

Frequency	To be provided on request
Modulation characteristics[2]	To be provided on request
Power output (expressed in EIRP in dBW per carrier) In order to minimise interference within its own network and with other radio networks, H3G operates its network in such a way that radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of H3G's network, the radio base station that is the subject of this application will be configured to operate in this way.	To be provided on request
Height of antenna (m above ground level)	23.61m

5.0 Technical Justification

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

The proposed development provides a solution to upgrade the existing site. The existing coverage will be maintained and the technology will be upgraded to provide 5G. It is therefore not considered necessary to provide coverage plots in this instance.

Background:

As part of H3G Ltd.'s continued network improvement program they wish to upgrade the existing site to facilitate additional coverage and capacity requirements, incorporating new technologies. Section 10 of the NPPF sets out the Government's general overview regarding supporting high quality communications infrastructure, recognising that advanced, high quality communications infrastructure is essential for sustainable economic growth. In order to keep the number of base stations to a minimum, the use of existing sites is considered to provide the optimum solution and accordingly the proposed site upgrade should be viewed positively. As such, no alternative locations were sought in this instance.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive; calls, texts, emails, pictures, web, TV and downloads. Without base stations, mobiles devices and phones will not work.

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

Many other everyday items also use radio signals to send and receive information, such as television and radio broadcasting equipment and two-way radio communications. Base stations are connected to each other and telephone exchange buildings by cables or wireless technology such as microwave dishes, to create the network. The area each base station covers is called a “cell”. Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service. Each base station covers a certain area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular, more base stations are needed to ensure continuous coverage.

It is imperative that support is given to the introduction of new infrastructure to allow new technology which will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds. This will enable places to remain competitive and will support the Government’s ambition for the UK to become a world leader in telecommunications technologies and development. Whilst it is acknowledged that there is a significant increase in the scale of telecommunications development on the site, it should be noted that the new technologies will provide advanced high-quality communications infrastructure essential for economic growth as sought by the NPPF. Any perceived negative impacts will be far outweighed by the overall benefits of the scheme and the location of the apparatus on a building which already supports extensive telecommunications equipment will minimise its potential impact on the immediate environment.

All H3G installations are designed to be fully compliant with the public exposure guidelines established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines have the support of UK Government, the European Union and they also have the formal backing of the World Health Organisation. A certificate of ICNIRP compliance will be included within the planning submission.

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[3]	**Site Name and address**	**National Grid Reference**	**Reason for not choosing**[4]

If no alternative site options have been investigated, please explain why **The site is an existing telecommunications site which is to be upgraded. Accordingly, alternative sites were not sought in this instance.**

[3] *ETS - Existing Telecomm site, ES - Existing Structure, RT - Roof Top, GF - Greenfield*
[4] SP - Site Provider, RD - Redevelopment Not Possible, T - Technical Difficulties, P – Planning
O – Other

Additional relevant information

Planning Policy Assessment

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with policies of the adopted Statutory Development Plan, unless material considerations indicate otherwise.

National Planning Policy Framework (2021)

The National Planning Policy Framework (NPPF) was published in July 2021 and supersedes previous versions of the document and national planning guidance contained in the various Planning Policy Guidance notes and planning Policy Statements. The NPPF sets out the Government's economic, environmental and social planning policies and how these are to be applied in relation to all planning applications.

Under Section 6 paragraph 81 the NPPF advises*…." Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."* In terms of supporting a prosperous rural economy paragraph 85*…" The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."* The proposal seeks the upgrade of an existing telecommunications site, rather than utilising land which has not previously been developed. This approach provides a sustainable solution to the need to upgrade telecommunications services in the area which will benefit not only the local community, but also visitors to the area and potentially reducing the need to travel.

In section 10 of the new NPPF, the document seeks to support *"Advanced, high quality and reliable communications infrastructure"* ensuring that it is *"essential to economic growth and social wellbeing"*. It advises that *"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."* Paragraph 115 states "*the number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate."* The proposal allows for the re-use of an existing telecommunications site which will be upgraded to allow for the introduction of 5G technologies.

Paragraph 116 continues "*Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:*
a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and

b) They have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.

The scheme will not cause any undue impact on the services outlined above and fully complies with ICNIRP standards. An ICNIRP certificate is enclosed with the application. The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for H3G (UK) Ltd to enhance telecommunications services in the area to the benefit of the local community and visitors to the area. It will make effective use of the land as set out under Section 11 of the NPPF. It is considered the proposed development complies with the broad aims of the NPPF. It assists in the aim to keep the number of installations to a minimum, by utilising an existing site. The equipment has been sympathetically designed, with the pole being kept to the minimum practicable height for the required to accommodate 5G network coverage, thus enhancing the provision of local community facilities and services without detracting from local amenity. More sensitive sites were specifically avoided and re-use of an existing telecommunications site provides the optimum solution in this instance.

Local Plan Policy

The statutory development plan for the area is comprised of The London Plan 2021 (adopted March 2021) and the Camden Local Plan 2016-2031 (adopted July 2017).

The London Plan 2021 (adopted March 2021).

GG2 Making the best use of land

To create successful sustainable mixed-use places that make the best use of land. Those involved in planning and development must:

a. *enable the development of brownfield land, particularly in Opportunity Areas, on surplus pblic sector land, and sites within and on the edge of town centres, as well as utilising small sites*
b. *prioritise sites which are well-connected by existing or planned publice transport*
c. *proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling*
d. *applying a design-led approach to determine the optimum development capacity of sites*
e. *understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character*
f. *protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible*
g. *plan for good local walking, cycling and public transport connnections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth*
h. *maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.*

H3G (UK) Ltd is committed to upgrading their existing networks across London and the rest of the UK, in order to bring the most up-to-date and advanced mobile communiciations technologies to the residents of the UK. This site constitutes the reuse of an existing site, thus avoiding the unnecessary proliferation of telecommunications equipment in the area that an new site would mean.

As the site has been designed to fit in with the existing vertical elements of the street scene, it is not considered that it will look out of place.

The proposed development is entirely consistent with and will help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

GG5 Growing a good economy

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

a. *promote the strength and potential of the wider city region*
b. *seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London*
c. *plan for sufficient employment and industrial space in the right locations to support economic development and regeneration*
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*
f. *promote and support London's rich heritage and cultural assets, and its role as a 24-hour city*
g. *make the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity*
h. *recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success.*

H3G (UK) Ltd is currently upgrading their network to accommodate 5G technologies and ensure that enhanced coverage and capacity is brought to communities across London and the UK.

In the current environment, ultra-fast, high-speed and enhanced mobile connectivity is vital to ensuring the continued prosperity of London, as businesses and individuals navigate the changing world post COVID-19.

It is considered that telecommunications networks are are an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. The proposed works will provide important telecommunications links to the area, enabling it to remain competitive, supporting the needs of the local economy and enhacing the local network to the benefit of the local community and visitors to the area.

Policy D3 Optimising site capacity through the design-led approach
The design-led approach

A. *All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastrucutre requirements for sustainable densities), and that best delivers the requirements set out in Part D…*
D. *Development proposals should:*
Form and layout

a. *enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions*
b. *encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area*
c. *be street-bassed with clearly defined public and private environments*
d. *facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users*

Experience

e. *achieve safe, secure and inclusive environments*
f. *provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest*
g. *deliver appropriate outlook, privacy and amenity*
h. *provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity*
i. *help prevent or mitigate the impacts of noise and poor air quality*
j. *achieve indoor and outdoor environments that are comfortable and inviting for people to use*

Quality and character

k. *repond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, ehance and utilise the heritage assets and architectural features that contribute towards the local character*
l. *be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well*
m. *aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy*
n. *provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.*

b. *Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.*

The proposed site has been specifically designed for the site in question and will introduce the latest equipment available to the area, in a form that will not unduly harm the general amenities of the area or its character and appearance. The antenna is designed to be minimally intrusive and as slim as possible, so that it can be more easily assimilated into the existing environment. The site lies within the Regents Canal Conservation Area, however, due the nature of the immediate area and the minimal nature of the installation, it is not considered that the upgrade will cause adverse harm to the amenity of the Conservation Area.

The applicant acknowledges that the proposed height of the antenna will reach above the roof parapet, as does the existing installation, however, this is the minimum height capable of providing the technological improvements sought. It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than are possible using the existing technology. This will enable

places to remain competitive and will support the Government's ambition for the UK to become a world leader in 5G.

Policy D4 Delivering good design

Design analysis and development certainty

A. *Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design-led approach.*
B. *Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decisiontaking, and to engage Londoners in the planning process.*

The proposed development has been specifically designed for the site in question. In devising the scheme, consideration has been given to the character and appearance of the existing area, the required technical improvements sought, seeking to provide a balance between the requirements of the operators and the setting within which the upgraded site is proposed. The proposed antenna is slimline, so as to blend into the surrounding environment. The height the proposed antenna is the minimum capable of introducing the required 5G technologies to the area. The latest designs and most up to date equipment will be employed and the proposed development will enable the area to remain competitive.

Although the antenna will rise above the parapet of the building, it will provide significant community benefit to both residents and local businesses.

Policy HC1 Heritage conservation and growth

A. *Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.*

B. *Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:*

    1) *Setting out a clear vision that recognises and embeds the role of heritage in place-making*
    2) *Utilising the heritage significance of a site or area in the planning and deisng process*
    3) *Integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*
    4) *Delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.*

C. *Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*

D. *Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscpaes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.*

E. *Where heritage assets have been identified as being At Risk, boroughs should identify specific opportuniries for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.*

The proposed site is located within the Regents Canal Conservation Area and is in close proximity to a number of listed historc assets. However, due to the height of the building and the slimline nature of the antenna, it is not considered that this development will adversely affect either the conservation area or the nearby historic assets, nor their significance and appreciation within their surroundings. This is confirmed by the fact that the building has been the site of a telecommunications installation since at least 2013 without adverse effect.

Policy SI 6 Digitial connectivity infrastructure

A. *To ensure London's global competitiveness now and in the future, development proposals should:*
    1. *ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users*
    2. *meet expected demand for mobile connectivity generated by the development*
    3. *take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation*
    4. *support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.*
B. *Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.*

H3G (UK) Ltd's network is integral in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with an will help to implement the strategic objectives contained in the London Plan and the London Infrastructure Plan.

It is clear from this that upgrading digital networks is a critical component of addressing the city's needs for improving digital connectivity. The current application is a key element of this and should therefore be supported.

The proposed development is sited on the rooftop of the Anglo-Scottish building and as an upgrade of an existing base station, will ensure that the unnecessary proliferation of telecommunications equipment in the area is avoided.

Camden Local Plan 2016-2031, adopted July 2017.

Policy A1: Managing the impact of development

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

We will:

- ***a.*** *Seek to ensure that the amenity of communities, occupiers and neighbours is protected;*
- ***b.*** *Seek to ensure development contributes towards strong and successful communities by balanacing the needs of development with the needs and characteristics of local areas and communities;*
- ***c.*** *Resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and*
- ***d.*** *Require mitigation measures where necessary.*

The factors we will consider include:

- ***e.*** *Visual privacy, outlook;*
- ***f.*** *Sunlight, daylight and overshadowing;*
- ***g.*** *Artificial lighting levels;*

Transport impacts, including the use of Transport Assessments, Travel

- ***h.*** *Plans and Delivery and Servicing Management Plans;*
- ***i.*** *Noise and vibration levels;*
- ***j.*** *Odour, fumes and dust;*
- ***k.*** *Microclimate;*
- ***l.*** *Contaminated land; and*
- ***m.*** *Impact upon water and wastewater infrastructure.*

The application site is the roof of the Anglo-Scottish building that has been occupied by telecommunciations infrastructure for a number of years. The proposed development is small in scale and will allow for greater capacity and connectivity without causing significant harm to visual amenity in the area. Telecommuniciations by their very nature help to reduce the need to travel and will enhance the digital amenity in the area.

Policy D1: Design

The Council will seek to secure high quality design in development. The Council will require that development:

a. *Respects local context and character;*
b. *Preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
c. *Is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
d. *Is of sustainable and durable construction and adaptable to different activities and land uses;*
e. *Comprises details and materials that are of high quality and complement the local character;*

f. *Integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
g. *Is inclusive and accessible for all;*
h. *Promotes health;*
i. *Is secure and designed to minimise crime and antisocial behaviour;*
j. *Responds to natural features and preserves gardens and other open space;*
k. *Incorporates high quality landscape design (including public art, where approprtiate) and maximises opportunities for greening for example through planting of trees and other soft landscaping;*
l. *Incorporates outdoor amenity space;*
m. *Preserves strategic and local views;*
n. *For housing, provides a high standard of accommodation; and*
o. *Carefully integrates building services equipment.*

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Tall buildings

All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to:

p. *How the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;*
q. *The historic context of the building's surroundings;*
r. *The relationship between the building and hills and views;*
s. *The degree to which the building overshadows public spaces, especially open spaces and watercourses; and*
t. *The contribution a building makes to pedestrian permeability and improved public accessibility.*

In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed se and sustainability.

Public art

The Council will only permit development for artworks, statues or memorials where they protect and enhance the local character and historic environment and contribute to a harmonious and balances landscape design.

Excellence in design

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

The proposed installation will bring 5G technology to the area, supporting modern infrastructure and providing the best network connectivity possibly across this area of Camden. Allowing both local residents and businesses the access to enhanced connectivity and coverage needed, particularly in an era where increased demands are placed on the telecommunications network due to the predicted rise in flexible homeworking following the COVID-19 pandemic.

The proposed base station is located in a mixed use area, comprising residential, commercial and public service buildings. It has been specifically designed for the site in question, taking into account the site context and the character and appearance of the surrounding area. The amenity of nearby occupiers has been fully considered, and as the upgrade of an existing site, this location was found to present the most suitable solution. The reuse of existing base stations is also the preferred option outlined in the NPPF.

Policy D2: Heritage

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 monumnets and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Desigated heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- *a) the nature of the heritage asset prevents all reasonable uses of the site;*
- *b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- *c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. 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.*

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

i) resist the total or substantial demolation of a listed building;
j) resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
k) resist development that would cause harm to significance of a listed building through an effect on its setting.

Archaeology

The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

The proposed site is located within the Regents Canal Conservation Area and is in close proximity to a number of listed historc assets. However, due to the height of the building and the slimline nature of the antenna, it is not considered that this development will adversely affect either the conservation area or the nearby historic assets, nor their significance and appreciation within their surroundings. This is confirmed by the fact that the building has been the site of a telecommunications installation since at least 2013 without adverse effect.

CONCLUSION

There is a requirement for H3G to provide advanced telecommunications technologies to this industrial/commercial area of Camden. Network planners have identified a need for an upgraded installation and the proposed development will address this identified need and continued customer demands.

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This application explains the technical need for the installation to provide improved customer service.
In terms of siting and design, it is considered that the proposal responds well to the character and appearance of the local environment and will not have an unacceptable adverse impact on the application site or the surrounding area. The design is of a high standard, and will not detract significantly from the existing visual and environmental character of the area. The benefits to residents and visitors to the area, by the introduction of 5G technologies to the area far outweigh any potential perceived negative impacts. In all these circumstances it is concluded that there no policy or other objections that would warrant the refusal of planning permission and accordingly permission should be granted for the proposed development.

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Signed	***Helen K Bolam***	**Date**	**8th April 2022**
Position	**Planning Consultant**	**Company**	**For and on behalf of H3G (UK) Ltd**