

Delegated Report		Analysis sheet		Expiry Date:	25/11/2022
		N/A / attached		Consultation Expiry Date:	11/12/2022
Officer				Application Number(s)	
Sam FitzPatrick				2022/4190/P	
Application Address				Drawing Numbers	
Crestview 47 Dartmouth Park Hill London NW5 1JB				Please refer to decision notice	
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature		
Proposal(s)					
Installation of telecommunications equipment (6 x antenna apertures, 1 x transmission dish, and 7 x equipment cabinets) to the roof of existing building and ancillary development thereto.					
Recommendation(s):		Refuse Planning Permission			
Application Type:		Full Planning Permission			

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice			
Informatives:				
Consultations				
Adjoining Occupiers:	No. of responses	286	No. of objections	271
Summary of consultation responses:	Site notices were displayed from 16/11/2022 to 10/12/2022 A press notice was published from 17/11/2022 to 11/12/2022			
	271 objections (including a petition) were received from local residents and groups, including: <ul style="list-style-type: none">• <i>Occupants/tenants/owners of Crestview residencies;</i>• <i>Crestview Flats Freehold Ltd;</i>• <i>Parish Church of Dartmouth Park, St Mary Brookfield;</i>• <i>Dartmouth Park Conservation Area Advisory Committee;</i>• <i>Dartmouth Park Neighbourhood Forum;</i>• <i>Dartmouth Park Road Residents Association;</i>• <i>Heath and Hampstead Society</i>• <i>Three Camden Councillors: Cllr Aref-Adib, Cllr Wright, and Cllr Berry;</i>• <i>Residents living locally in Dartmouth Park Road, Dartmouth Park Hill, Dartmouth Park Avenue, Tremlett Grove, West Hill Court, Bredgar Road, Twisden Road, Croftdown Road, Monnery Road, York Rise, Maiden Place, Stoneleigh Terrace, Laurier Road, Bramshill Gardens, Poynings Road, Swains Lane, Chetwynd Road, Highgate Road, and Parliament Hill.</i> <p>The main concerns raised are summarised as follows:</p> <ul style="list-style-type: none">- <i>Visual clutter and heritage</i><ul style="list-style-type: none">○ <i>Telecommunication installations would create prominent and harmful visual clutter in the skyline and dominate/detract from character and appearance of Crestview and Dartmouth Park Conservation Area;</i>○ <i>Development will be visible from neighbouring conservation areas and detract from their settings;</i>○ <i>Development will detract from setting and appearance of Grade II* listed St Mary Brookfield;</i>○ <i>Structure will be visible from far away and harm views from open spaces such as Hampstead Heath;</i>○ <i>Design of the equipment is bulky and ugly and would be a unwelcome addition to the existing building.</i>- <i>Amenity and health</i><ul style="list-style-type: none">○ <i>Risk of health impacts from telecommunications equipment and 5G technologies, especially to vulnerable people such as the elderly and children;</i>○ <i>Disturbance to quality of life of residents from works including those to strengthen the roof and made appropriate for equipment;</i>○ <i>Maintenance required to telecommunications equipment would allow unscheduled access to residential building from unknown visitors that perform development or maintenance work.</i>- <i>Inaccurate/insufficient information</i><ul style="list-style-type: none">○ <i>Documents and drawings show incorrect features that may be misleading (e.g. too many garages shown at ground level, showing satellite dishes and aerial antennas on roof where there are none, misrepresenting space between buildings).</i>- <i>Site search</i><ul style="list-style-type: none">○ <i>Revised search is mostly identical to previously refused application with additional buildings that were likely not realistic suggestions;</i>○ <i>Lack of consideration for other more appropriate sites.</i>- <i>Public engagement and community</i><ul style="list-style-type: none">○ <i>Residents have already made clear their opposition to the scheme less than two years ago, so feel their opinions are ignored;</i>○ <i>Photomontages not provided that would enable better understanding of proposed works;</i>○ <i>Works are contrary to the ‘decluttering’ of the roof organised by residents since 2016.</i>			

- *Impact on wildlife*
 - o *Roof has potential to be home for birds/bees/bats but equipment would prevent that and harm local wildlife;*
 - o *Bat survey completed for previous application (that was attached to this application also) is inadequate and does not properly assess locations for bat sites.*

Officer Response:

- *In regard to the submitted drawings, the points and concerns raised by the local residents and objectors concerning inaccuracies and inadequacies have been noted and taken into account when viewing the drawings. The case officer visited the site to confirm the site details;*
- *In regard to the building's roof structure, it is the responsibility of the applicant to ensure that the roof is capable of supporting the proposed equipment. It is also noted that the roof was already the site of telecommunications equipment at a previous point in time;*
- *For all other concerns raised, please see sections 2-6 below in the 'Assessment' part of this report.*

Site Description

The application site is Crest view, a six-storey residential block located on the corner junction between Dartmouth Park Hill and Laurier Road. The building was constructed in the early 1960s and contains residential flats with garages at ground floor level. The surrounding area is predominantly residential in character and is in close proximity to Dartmouth Park and Reservoir to the north-east, a Victorian covered reservoir and public park.

The application site is located within both the Dartmouth Park Conservation Area and the Dartmouth Park Neighbourhood Forum Area. Crest view is identified in the Dartmouth Park Conservation Area Appraisal and Management Statement (adopted in January 2009) as making a negative contribution to the Conservation Area.

Although the building itself is not listed, it is located opposite St. Mary's Brookfield, a Grade II* Listed church, constructed between 1869 and 1875 by William Butterfield and recognised as making a major contribution to the streetscape in the Dartmouth Park Conservation Area Appraisal and Management Strategy.

Relevant History

2021/0598/P – Installation of electronic communications equipment on rooftop comprising 6 x antennas on tripod structures, 4 x dishes, 8 x cabinets and ancillary works, including 1 x meter cabinet at ground level on public highway. **Refused 03/08/2021.**

PEX0000653 - A rooftop installation of 6 antennae, 4 microwave dishes, and the associated equipment cabin. **Withdrawn 16/01/2001.**

PE9800146 - Installation of 3 cabinets and raised platform at roof level in connection with telecommunications equipment. **Prior Approval Granted 23/03/1998.**

9501039 & 9501040 - Installation of a handrail and telecommunication facilities on the roof including 6 antennae 3 cabins and one radio transmitter dish. **Granted 16/11/1995.**

Relevant policies

National Planning Policy Framework (2021)

- **Section 6** Building a strong, competitive economy
- **Section 10** Supporting high quality communications
- **Section 12** Achieving well-designed places
- **Section 16** Conserving and enhancing the historic environment

The London Plan (2021)

Camden Local Plan (2017)

- **A1** Managing the impact of development
- **A2** Open space
- **D1** Design
- **D2** Heritage
- **E1** Economic development

Dartmouth Park Neighbourhood Plan (2020)

- DC1 Enhancing the sense of place
- DC2 Heritage assets
- DC3 Requirement for good design
- ES1 Green and open spaces

Camden Planning Guidance

- CPG Amenity (Jan 2021)
- CPG Design (Jan 2021)
- CPG Digital Infrastructure (Mar 2018)
- CPG Public Open Space (Jan 2021)

Dartmouth Park Conservation Area Appraisal and Management Strategy (2009)

Assessment

1. The Proposal

- 1.1. Planning permission is sought to install electronic communications equipment to the rooftop of the host building, comprising of six antenna apertures, one transmission dish, seven equipment cabinets, and ancillary works.
- 1.2. While telecommunications equipment has been installed on the rooftop previously, there is currently no existing equipment in situ. The proposal therefore involves the installation of new equipment to a new rooftop site and the establishment of a new base station. This would provide improved connectivity and network enhancement, including 5G coverage, to the surrounding areas on behalf of established electronic communications operators, EE and H3G.
- 1.3. The roof area of the host building consists of a main flat roof space measuring 19m in height above ground level with a plant room positioned centrally. The plant room also has a flat roof measuring 22.05m in height above ground level. A roof parapet rises 0.3m above the main roof level. The submitted drawings are shown below (Image 1) and show a number of existing satellite dishes and aerials. This appears to be inaccurate, as the rooftop is absent of any telecommunications equipment, a matter highlighted by several consultation responses from residents who state that the roof is absent of dishes or aerials of any kind.

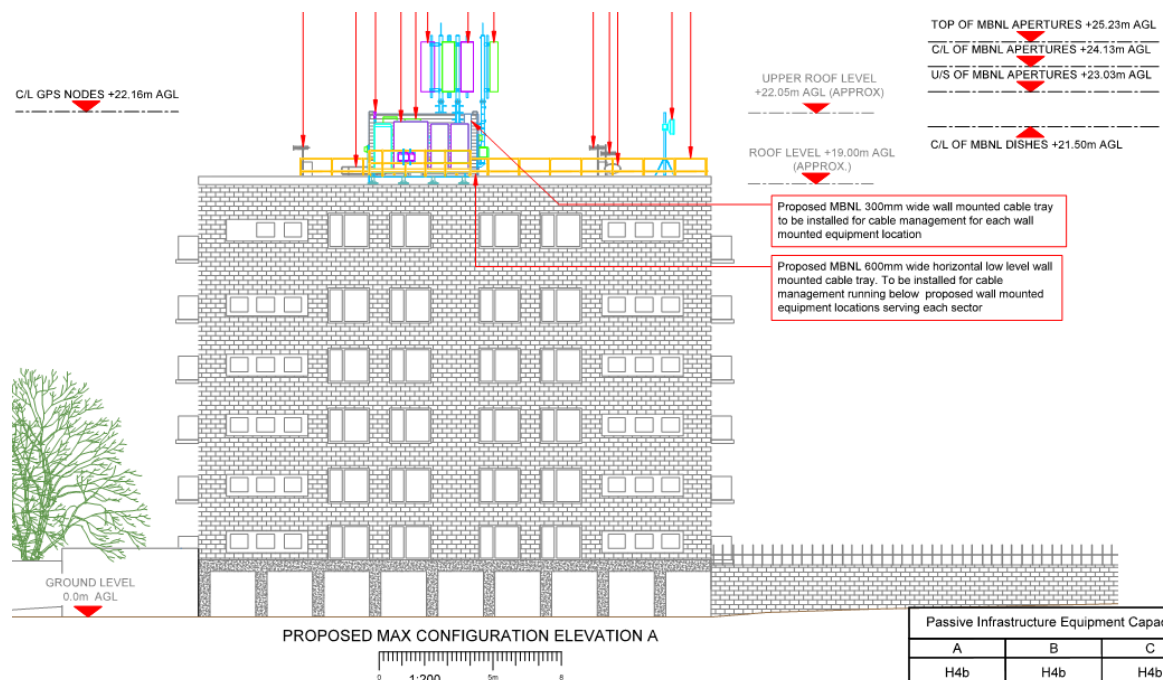


Figure 1: Proposed Elevation A (extract taken from drawing 265-A MAX CONFIGURATION ELEVATION Issue C)

- 1.4. The 6 x proposed antennas would be mounted in pairs on three mounting poles and located in a cluster around the plant room, which they would all be fixed to the walls of. The drawings show the top of the antenna to measure 6.23m above the height of the main roof and 3.18m above the height of the plant room, which the antennas are wall mounted against. The top of the wall mounting structure would rise a further 0.82m approximatively above these heights (7.05m above the main roof and 4m above the plant room roof).
- 1.5. 1 x proposed dish would be installed and mounted on a freestanding frame at the southeast edge of the main roof. The top of the dish and supporting frame would measure approximately 3.10m above the height of the main roof.

1.6. The proposed 7 x equipment cabinets would be installed on a steel freestanding cabinet support frame and located at the south end of the main roof. The cabinets themselves appear to have a maximum height of approximately 3.10m above the main roof. Associated cable trays would be installed, two of which would be wall-mounted and running below the wall-mounted equipment, and one of which would be on rubber blocks to the dish frame. A freestanding handrail is proposed to be installed around the roof, measuring 1.1m high and against the east and south edges of the roof, but set back from the north and west edges.

1.7. The supplementary information document submitted in support of the application states that the proposed location is the least visually intrusive site and design available, and that the development would not appear excessive. Where previous proposals did not utilise the plant room walls, the applicant states that now it has been confirmed that the plant room can support the antenna support poles. The applicant also raises the fact that the Local Authority previously considered the building appropriate for accommodating telecommunications equipment.

2. Assessment

2.1. The principal considerations in the determination of this application are:

- The design and heritage impact of the proposals on the character and appearance of the host building, local views, Dartmouth Park Conservation and Neighbourhood Areas, and within the settings of nearby listed building(s) and neighbouring conservation areas;
- The impact of the proposal on neighbouring amenity.

3. Design and Heritage

3.1. Local Plan Policy D1 (Design) establishes that *“careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings”*. It further states that *“good design takes account of its surroundings and preserves what is distinctive and valued about the local area”*.

3.2. Local Plan Policy D2 (Heritage) establishes that the Council will require development within conservation areas to preserve and enhance the character and appearance of the area and will resist development that would cause harm to the significance of a listed building through an effect on its setting. The Dartmouth Park Conservation Area Appraisal and Management Statement supports this as it states that its policies intend to preserve or enhance the character or appearance of the conservation area due to its special status.

3.3. The aforementioned policies of the Camden Local Plan are supported by the Dartmouth Park Neighbourhood Plan policies DC1 (enhancing the sense of place), DC2 (heritage assets), and DC3 (requirement for good design). They are also reinforced by Camden’s Planning Guidance (CPG) on ‘Design’, ‘Digital Infrastructure’, and ‘Public Open Space’. Of particular note is section 9 of the CPG Design, which states that building services equipment should *“be incorporated into the host building aesthetically”* and *“not harm listed buildings, conservation areas, or streetscapes”*. It also clarifies that design considerations for building services equipment in conservation areas should take into account the visual impact of the development, including views into and from conservation areas.

3.4. The National Planning Policy Framework (NPPF) in Paragraph 115 of Chapter 10 (Supporting high quality communications) states that *“the number of radio and electronic communication masts 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”*. The NPPF goes on to say that new sites should be sympathetically designed and camouflaged where appropriate.

3.5. The host building, Crestview, is not listed but it is located within the Dartmouth Park Conservation and Neighbourhood Areas. The building is six storeys tall and features a large flat roof area with a small plant room in the centre of the roof. The flat roof currently is free of any telecommunications equipment.

3.6. Crestview and the immediately surrounding area are shown below in Image 2, with the four elevations shown by the drawings clearly labelled. Below that, Image 3 shows the roof with the approximate positions of the 6 x proposed antennas, the 1 x transmission dish, and the area contained the 7 x rooftop equipment cabinets. The antennas (there are 2 x antennas in each shown area) are indicated by A1, A2, and A3, the dish is indicated by D1, and the area containing the cabinets is indicated by C1.

3.7. The application site of Crestview is located at the top of Dartmouth Park Hill, so is highly visible from a number of different directions, as shown by the images 1-4 below. The building itself is also substantially taller in comparison with neighbouring buildings in the surrounding area, which are mostly lower-level residential properties. The only building that is a similar height is St Mary Brookfield, a Grade II* listed church immediately adjacent to the south of the site. Section 3 details the impact of the proposal on the church and its setting. The location, siting, and scale of the host building emphasise its prominence within the area, skyline, and numerous views.



Figure 2: Aerial view of Crestview and immediately surrounding area

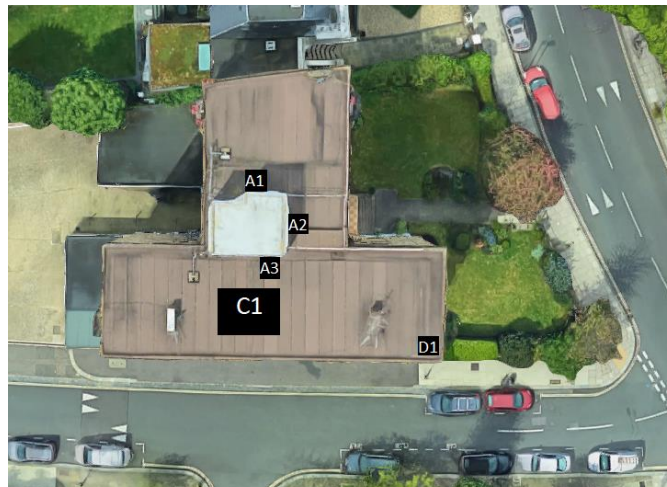


Figure 3: Aerial view of Crestview and proposed siting of equipment

3.8. Policy A2 (Open space) aims to protect all designated public and private open spaces, including resisting development that would be detrimental to the setting of designated open spaces. The Dartmouth Park Neighbourhood Plan also includes policy ES1, which seeks to protect open spaces and prevent harm to the visual character of the area. Similarly, policy DC2 of the Neighbourhood Plan aims to ensure that development that affects any positive contributors to the Dartmouth Park Conservation Area should be designed to a high standard and that development harming the character or appearance of heritage assets should not be permitted. Combined with their similar heights, Crestview's close proximity to St Mary Brookfield Church means that the two buildings are both visible together from multiple viewpoints, and development to the roof of the former would impact on the heritage value of the latter.



Image 1: view from SW (Dartmouth Park Road)



Image 2: view from W (Laurier Road)



Image 3: view from SE (Dartmouth Park Hill)



Image 4: view from N (Dartmouth Park Hill)

3.9. Due to the site's location at the top of Dartmouth Park Hill and the significant contrast with the surrounding buildings, the roofscape of Crestview is highly visible from a number of local park views and public vantage points – including Parliament Hill, Hampstead Heath, and Dartmouth Park and Reservoir. As a result of the proposal, any equipment installed to the roof of Crestview would be very visible and noticeable within the skyline from numerous vantage points within the spaces and parks identified above, including Hampstead Heath (see images 5-8). This would introduce visual clutter that would cause harm where otherwise there are open and unrestricted views from these areas.



Image 5: view from Parliament Hill Field Athletics Track



Image 6: view from Parliament Hill Fields



Image 7: view from north of William Ellis School



Image 8: view from Dartmouth Park

3.10. The proposed equipment would create intrusive and conspicuous visual clutter in a rooftop otherwise notably clear of this. The maximum height of the equipment would rise 7.05m above the roof level, which would mean that the telecommunications installation would increase the height of the building, approximately by over a third of its existing height. As noted in the report for the refused application in 2021, the residents of Crestview have also spent time attempting to declutter the roof space through the removal of external aerials and dishes.

- 3.11. As part of their justification for choosing Crestview as a potential site for a new telecommunications site, the applicant asserts that the Council previously deemed the building as suitable to accommodate telecommunications equipment. Council records confirm that the installation of telecommunications was most recently approved in 1998 (ref. PE9800146), so a significant amount of time prior to the Council's current policies and guidance, as well as before the establishment of the Dartmouth Park Neighbourhood Forum in 2013 and adoption of the most recent Neighbourhood Plan in 2020. The Dartmouth Park Conservation Area Appraisal and Management Statement was also only established in 2009, so after the most recent grant of telecommunications equipment. Therefore, while the Council is mindful of all relevant planning history whilst assessing this proposal, it is considered on its own merit, taking into account any matters pertinent to the proposals in accordance with all current relevant policy and guidance.
- 3.12. Although the telecommunications equipment is proposed to be positioned around the plant room and thus not to the edges of the rooftop, the height of the equipment would still mean that it is clearly visible from all elevations and no attempt has been made to screen or conceal the equipment. Under these circumstances, the proposed installation of equipment is considered to be inappropriate as it would introduce equipment of excessive height that is prominently positioned both on the building and within the general area. The clear visibility would create an unattractive addition to the skyline that would appear dominant on the roofscape and prominent from both close proximity and afar. Overall, this would harm the appearance of the Crestview building.
- 3.13. The Crestview building is also identified as making a negative contribution to the local area in the Dartmouth Park Conservation Area Appraisal and Management Statement, so the addition of further harmful elements would likely exacerbate this. Additionally, it is still situated within a designated conservation area, regardless of its own status, and additionally lies on the boundary of the St John's Grove Conservation Area, located within the London Borough of Islington. It is also clearly visible from the neighbouring conservation areas of Highgate Village and Holly Lodge.
- 3.14. Immediately to the south of the site is St Mary Brookfield, a Grade II* listed church, so this would also inevitably be impacted by any works to Crestview. The church itself was constructed between 1869-1875 by William Butterfield and is identified as being a major contributor to the streetscape by the Dartmouth Park Conservation Area Appraisal and Management Strategy. The church is highly visible in the same way that Crestview is, including from open spaces and nearby conservation areas. Policy D2 of the London Borough of Camden Local Plan specifically says that the Council will resist development that may cause harm to the significance of a listed building through an effect on its setting. As a result of the similarity in height of St Mary Brookfield and Crestview, any telecommunications equipment such as that proposed would rise above the height of the church building and appear dominant, impacting negatively on the special setting of the heritage asset and the views of the listed building. Views of the church would be impacted from all directions, as the telecommunications equipment would either appear in the foreground or background, depending on which direction it is viewed from.
- 3.15. While it is understood and accepted that electronic telecommunications equipment is unlikely to integrate with all environments due to their function, design, and aesthetic, the proposed installation would be particularly at odds with the environment and context at Crestview. This is especially important due to the close proximity with St Mary Brookfield and its special architectural and historic setting, which would be harmed by the appearance of the telecommunications equipment. Additionally, the documents provided in the application submission do note the importance of the listed building, but state that other locations are not possible, and screening would not be a suitable option, concluding that the impact on heritage assets would be less than substantial, though little evidence is given to support this claim. While it is accepted that increased connectivity is a desirable outcome, the harm to the heritage assets is not justified.

4. Amenity

- 4.1. Local Plan Policy A1 (Managing the impact of development), supported by the Camden Planning Guidance on 'Amenity', seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered and by only granting permission for development that would not harm the amenity of communities, occupiers, and neighbours.
- 4.2. Local Plan Policy A2 (Open Space) seeks to protect and enhance Camden's parks and open spaces, including by resisting development which would be detrimental to the setting of designated open spaces. This specifically includes resisting proposals which would cause "*disruption to views in or out of the space*".
- 4.3. It is considered that the proposed telecommunications equipment would not have any impact on privacy, outlook, or either daylight or sunlight. The equipment would also not typically emit any perceptible sound. The cabinets may potentially cause some degree of vibration, however this would likely be low and dampened by the secure fixing, so these elements partnered with the location of the cabinets would minimise any undue impact. Please see paragraphs 5.5-5.7 below for reference to public health matters.
- 4.4. The proposed telecommunications equipment would be highly visible from adjacent open spaces such as Hampstead Heath, Parliament Hill, and Dartmouth Park (though this lies outside Camden). The excessive scale

and character of the proposal would be detrimental to the setting of these open spaces through disruption to views, so would be contrary to policy A2 of the London Borough of Camden Local Plan.

- 4.5. Overall, it is therefore concluded that there would be some impact on residential amenity (although none with regards to public safety issues) As such, the proposal accords with the relevant provisions of the NPPF as required, policy A1 of the London Borough of Camden Local Plan, and Camden Planning Guidance, but is contrary to policy A2 of the London Borough of Camden Local Plan.

5. Supplementary Information

- 5.1. The NPPF states in paragraph 117 of Chapter 10 (Supporting high quality communications) that any application for electronic communications development should be supported by the necessary evidence to justify the proposed development. This should include:

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

- 5.2. As part of the application, the applicant has provided confirmation that the two nearest schools (Acland Burghley School and La Sainte Union Catholic Secondary School) were notified prior to the submission of the applications. In addition to this, Highgate Ward Councillors Berry, Aref-Adib, and Wright were all notified, along with Heathrow Airport, the residents of Crestview, and other nearby neighbouring buildings. All notifications were sent on 16 September 2022. The applicant also states that pre-application consultation correspondence was sent to the Council on the same date (16/09/2022), however the Council appears to have no record of receiving any correspondence. There is also no indication from the applicant that other parties with a potential interest such as the facilitator at St Mary Brookfield church of the Dartmouth Park Conservation Area Advisory Committee were consulted.

- 5.3. The applicant confirms in their supplementary information that neither school issued a response, Councillor Berry objected, Heathrow Airport made no objection, and 13 objections were received from local residents. The objections primarily related to the previous refused permission, the conservation area context, the lack of information, alternative locations, health and safety issues, and visual impact concerns. Therefore, in view of this and the very high level of interest from local residents evidenced from the amount of responses received by the Council regarding the current proposal, it is considered that the opportunity for interested parties to view the proposal and provide their views has been adequately exercised.

- 5.4. The Preliminary Roost Assessment Survey completed in support of the previous assessment was attached to this application too, and was dated 21/02/2021. This was undertaken by Arbtech and confirms that the building has a negligible habitat value for roosting bats. In order to ensure that protected and priority species are safeguarded, a condition would be attached to any approval requiring a full survey to be carried out by a suitably qualified ecologist and accompanied by a report confirming the results and implications of the assessment, including any revised mitigation measures, to be assessed by the Council.

Public Health

- 5.5. In support of this application, an ICNIRP Declaration was submitted which certifies that the proposed equipment is designed to be fully compliant with the precautionary guidelines set by the International Commission on Non-ionizing Radiation Protection (ICNIRP). This is an independent body of scientific experts established by the International Radiation Protection Association. As such, the equipment is not anticipated to have any direct impact on public health.

- 5.6. It is noted that there were a number of objections to the proposed work that oppose the telecommunications on the grounds that it may have negative impacts on public health. Paragraph 116 of the NPPF states that local planning authorities must determine applications on planning grounds only, and that does not give any scope for local planning authorities to determine health safeguards beyond compliance with ICNIRP guidelines.

- 5.7. The Council also notes the significant amount of advice and information available on health issues that concludes that mobile phone base stations do not pose any health risks to people, including children. This advice includes, amongst others, reports from Public Health England (PHE) in 2019, the Finnish Radiation and Nuclear Safety

Authority (STUK) in 2019, and the Norwegian Radiation and Nuclear Safety Authority (DSA) in 2019, all of which conclude that there is no evidence that exposure to radio frequency within agreed guidelines levels is harmful to public health.

6. Planning Balance

6.1. The assessment outlined in sections 3-4 of this report has evaluated the impact of the telecommunications equipment and shown that it is considered that the proposed development would result in less than substantial harm to the host property, local view from the public realm and nearby open spaces and public parks, and the Dartmouth Park Conservation And Neighbourhood Areas, as well as the settings of neighbouring conservation areas and St Mary Brookfield, which is Grade II* listed.

6.2. As supported by policies D1 and D2 of the London Borough of Camden Local Plan, as well as policies DC1, DC2, and DC3 of the Dartmouth Park Neighbourhood Plan, designated heritage assets should be preserved and enhanced. Additionally, the National Planning Policy Framework states in paragraph 202 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”*.

5G system, improved connectivity, and public benefit

6.3. The supporting information document submitted in support of the planning application outlines the potential benefits that the telecommunications installation would have. The proposal intends to provide replacement coverage and network enhancement, and would provide 2G, 3G, 4G, and 5G coverage. The increased frequencies of 5G allow for greater bandwidth and capacity, so would improve connectivity, speed, and service enhancement; the Government has generally encouraged infrastructure to deliver these developments where appropriate.

6.4. It is also important to note that 5G systems tend to have more complex radio equipment and require extra supporting structures to raise the antenna heights. This is to avoid the ‘clipping’ effect of building edges given that 5G signals are more prone to the shadowing effect of adjacent buildings or existing structures, which is particularly important as 5G radio frequencies do not travel as far as other frequencies currently in use.

6.5. The submitted application and associated supplementary information states that the chosen site and design are the least visually intrusive option possible given the technical constraints of 5G systems and potential locations available.

Planning balance

6.6. According to paragraph 13 of the Camden Planning Guidance on digital infrastructure, *“the Council will aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum”*. This is supported by the NPPF, which also states that such telecommunications equipment should be kept to a minimum, and where new sites are required, they should be sensitively and sympathetically designed so as to reduce their visual impact, using appropriate camouflage where possible.

6.7. The supporting information submitted in associated with this application does show that the applicant has identified and considered alternative site locations within the locality, which were discounted for various reasons. Most of the alternative sites specified are those that were considered in the previous application in 2021, and the same reasoning is given for discounting these. The reasoning given for these sites does not include enough site-specific information or evidence to justify deeming these unsuitable, as there is no clear comparison between the merits of the proposed site with these other sites. The three additional sites that have been considered for this new application give context and site-specific information, but the reasoning for discounting these sites is not considered sufficient enough to justify the establishment of a new site at Crestview. Similarly, there are other tall buildings around the Archway area that appear to have not been considered despite seeming potentially appropriate, so it is deemed that there has not been enough consideration of alternative sites (new or existing) to support a new site at Crestview.

6.8. The supporting information does also point out that the positioning of the equipment has been changed from primarily around the edges of the rooftop to massed around the plant room. Although this would result in a more central position away from the edges of the roof, the increased height and limited size of the rooftop means that the equipment would still be highly visible and there is little change in its impact on the surroundings. Additionally, the possibility of screening is briefly considered, though the necessary scale of the screening is considered to likely have a greater visual impact than the equipment itself, so is not deemed by the applicant to be useful or desirable. Other than this and moving the position of the equipment, there is no alternative considered to reduce the visual impact, and there is therefore little evidence demonstrating that particular regard has been given to the designated heritage assets, their special interest, or their settings.

6.9. As a result of these factors, weighing the less than substantial harm caused as a result of the proposed

development against the potential public benefit, it is considered on balance that the benefit to the public arising from enhancing the local electronic communication coverage and increased capacity would not outweigh the harm arising to the character and appearance of the host property, local views from the public realm (including open spaces and public parks), the Dartmouth Park Conservation and Neighbourhood Areas, the settings of neighbouring conservation areas, and the Grade II* listed church, St Mary Brookfield.

- 6.10. Therefore, on balance, the proposed development does not accord with Chapter 16 of the NPPF, which seeks to preserve and enhance heritage assets. It is also contrary to policies A1, A2, D1, and D2 of the London Borough of Camden Local Plan, and policies DC1, DC2, DC3, and ES1 of the Dartmouth Park Neighbourhood Plan. As such, the proposal is considered to be unacceptable in terms of its design, appearance, and location.

7. Conclusion

- 7.1. The proposed development would fail to accord with policies A2, D1, and D2 of the London Borough of Camden Local Plan, policies DC1, DC2, DC3, and ES1 of the Dartmouth Park Neighbourhood Plan, Chapter 16 of the National Planning Policy Framework, and the relevant guidance outlined throughout the report. The telecommunications equipment proposed by the application would result in dominant visual clutter that would negatively impact on the host building, nearby buildings, and surrounding area. The prominent location of the development combined with the scale of the proposed works would exacerbate the visual impact and result in significant visibility from the surrounding area. As such, it would detract from the character and appearance of the host property, the Dartmouth Park Conservation and Neighbourhood Areas, the settings of neighbouring conservation areas, the adjacent listed church building, and cause harm to the openness and character of nearby public parks. The proposal is not considered to have any adverse impacts on residential amenity or public safety issues for any residential occupiers, whether within the host building or neighbouring buildings.

8. Recommendation

- 8.1. It is therefore recommended, on balance, that planning permission is refused for the following reason.
- 8.2. The proposed telecommunications equipment located at roof level, by reason of its design, size, height, number, and location, would result in visual clutter which would detract from the character and appearance of the host property and the Dartmouth Park Conservation and Neighbourhood Areas, and would cause harm to the openness and character of the nearby public parks, as well as the settings of neighbouring conservation areas and the adjacent Grade II* Listed church building (St Mary Brookfield) contrary to policies A2 (Open Space), D1 (Design), and D2 (Heritage) of the London Borough of Camden Local Plan, as well as policies DC1 (Enhancing the sense of place), DC2 (Heritage assets), DC3 (Requirements for good design), and ES1 (Green and open spaces) of the Dartmouth Park Neighbourhood Plan 2020.