

Date: 24/07/2023  
Your Ref: 2023/2443/P  
Our Ref: 17007

**DWD**

6 New Bridge Street  
London EC4V 6AB



Brendan Versluys  
Development Management, Regeneration and  
Planning  
London Borough of Camden  
5 Pancras Square  
London N1C 4AG

Dear Brendan,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**

**LETTER OF OBJECTION RE: HIGHSTONE MANSIONS 84 CAMDEN ROAD LONDON NW1 9DY, PLANNING REFERENCE NO. 2023/2443/P**

DWD has been instructed to write to you on behalf of Battlehome Limited, who are the freehold owners and represent the long leasehold residential owners of the Site, Highstone Mansions 84 Camden Road London NW1 9DY. We write to object to the following application at Highstone Mansions 84 Camden Road London NW1 9DY ("**Development Site**") which proposes:

*Erection of 6 x panel antennas, 2 x dish antennas, and 2x equipment cabinets; erection of handrail at the roof parapet.*

This letter sets out our client's reasons for objecting. The concerns primarily relate to the visual impact on the setting of the surrounding conservation area and the impact the proposed development will have on their proposed green infrastructure upgrades to the Site.

Our client wants to ensure the development is considered within the wider context of the conservation area and does not compromise long term environmental upgrades planned for the Site.

**The Proposed Development**

The Proposed Development would result in the installation of 6 no. additional pole-mounted antennas to the roof of the building, 2 no. 300mm transmission dishes and 2 no. equipment cabinets on the roof of the building and ancillary works including installation of handrails to the roof of Highstone Mansions, 84 Camden Road, Camden, London, NW1 9DY.

The proposed host building is a seven storey L-shaped 1930's block of flats on the corner of Camden Road and the Regent's Canal, adjacent to North Road Bridge. The site is not listed but lies within the Regent's Canal Conservation Area. The North Road Bridge over Regents Canal is a grade II listed structure. Beyond the North Road Bridge is located nos. 74-82 Camden Road, a short terrace of residential dwellings circa 1850s.



The rear of the site also forms the boundary for the Camden Broadway Conservation Area; and features nos. 4-9 Lyme Terrace, a row of five houses dating from the 1840's which form a particularly attractive group fronted by a pavement and railings overlooking the canal.

Both 74-82 Camden Road and 1-6 Lyme Terrace (including the retaining wall above towpath) have been identified by the Council as buildings and other structures which make a positive contribution to the character and appearance of the conservation area, within the Regent's Canal Conservation Area Appraisal and Management Strategy (September 2008). Figure 1 (below) is taken from Camden Road travelling north and depicts the host building on the left, and its relationship to the North Road Bridge and 74-82 Camden Road.



Figure 1: Host building (left) in relation to surrounding buildings and structures.

### Impact on Conservation Area

The host building is located in a prominent location in relation to the canal, with the full length of the site elevation prominent within the conservation area, and visible when walking along the towpath. In addition, the host building, given its proximity to the North Road Bridge forms part of the setting of the grade II listed structure. Therefore, the host building can be considered as important for the preservation of the character of the above-mentioned heritage assets.

The Camden Local Plan (July 2017) establishes the need for high quality design in Policy D1 (Design). It requires that development [amongst other things], a. respects local context and character; b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage; and m. preserves strategic and local views, including views relating to Regent's Canal.

Chapter 16 (Conserving and enhancing the historic environment) of the National Planning Policy Framework (July 2021) ("**NPPF**") identifies at paragraph 197 that "*In determining applications, local planning authorities should take account of ... the desirability of new development making a positive contribution to local character and distinctiveness*".

Paragraph 202 of the NPPF advises 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*".

This approach remains consistent with the Camden Local Plan in Policy D2 (Heritage) and notes the Council will take account of conservation area appraisal and management strategies when assessing applications.

Regent's Canal Conservation Area Appraisal and Management Strategy (September 2008) provides a structured approach to development which impacts on the conservation area. It notes at Page 44 *"The roof forms of historic canal-side buildings are visible in views and vistas along the canal and also contribute to the canal's character"*. Page 44 further notes *"satellite dishes are not normally acceptable where they are positioned on the main facade of a building or in a prominent position easily seen from the canal. The smallest practical size should be chosen, and the dish kept out of sight"*. Whilst this refers to satellite dishes specifically, it likely predates the abundance of antenna required for shorter millimetre 5G waves.

The roof of the host building, being adjacent to the canal, contributes to the canal views and vistas and to the canals character. The existing roof line, as shown in figure 1, shows a lack of clutter along this roof space where the host site is adjacent to the canal and the nearby listed structure. The introduction of multiple raised antennas on the roof edge, adjacent to the canal is considered to have a negative visual impact on views within the conservation area which contribute to the canal's character. Further, the antenna would project 3m above the existing un-cluttered roof line and would distract and harm the vista of the buildings of significance on Camden Road (74-82) and North Road Bridge when travelling northbound on Camden Road (Figure 1, above).

The proposal would conflict with the conservation area appraisal and management strategy, and Policies D1 and D2 of the development plan. It would add conspicuous clutter on the rooftop highly noticeable against the skyline, and clearly visible from public views close by and when travelling along Camden Road. As such, the proposal is considered to be visually insensitive and harmful to the character and appearance of the adjacent Regent's Canal conservation area, North Road Bridge heritage asset and buildings of significance in the vicinity of the site.

The supporting information submitted with the application identifies alternative site locations within the locality, which were discounted for various reasons. It notes the proposed location is considered in this assessment to be the *"least visually intrusive site"*. It does not appear that the assessment has considered the views and vistas noted above before proceeding with this chosen location.

It is noted Camden council have refused applications for similar development including at 60 Gray's Inn Road (ref: 2021/5460/P) and Crestview 47 Dartmouth Park Hil (2022/4190/P) due to the harm to surrounding conservation areas and nearby listed and locally listed buildings. The Council acknowledged and welcomed the public benefit of improving connectivity within the borough however the strong heritage constraints of the sites were considered to outweigh the public benefit.

It is therefore requested that the proposal be refused on grounds of inappropriate location, and its harmful impact to local views, the conservation area, and the setting of the nearby listed structure.

#### Environmental Impact

The Regent's Canal Conservation Area Appraisal and Management Strategy (September 2008) notes the Council will seek to protect and enhance the canal as a green chain to provide a habitat for wildlife and a pedestrian route in pleasant environments. It also advises that the Council will promote the canal as part of the network of metropolitan walks and will seek to create circular routes to link the canal to other open spaces.

Policy CC2 (Adapting to climate change) actively promotes the installation of green roofs to support a sustainable approach to drainage and biodiversity.

The host building has been identified by our client as being suitable for green infrastructure upgrades, these include the introduction of photovoltaic (PV) panels and sedum system green roof. Battlehome Limited has obtained quotes from contractors for these works. Whilst our client had hoped to have progressed these works forward by now, due to other required works which have been needed at the building, due to changes required under the Building Safety Act, the safety works have had to be prioritised before the delivery of the green roof and pv panels. According to the Planned Preventive Maintenance report prepared for Highstone Mansions by CS2, there is major repair work required to the roof to prepare it for the green roof and this work will involve, amongst other repair works, the installation of new flat roofing systems. Our client however remains committed to bringing forward these works in the near future.

The proposal would result in the loss of a suitable location identified for green infrastructure upgrades. This would conflict with Policy CC2 of the development plan, and wider national objectives to increase biodiversity net gain and climate change adaption.

#### Summary

The National Planning Policy Framework (NPPF) advises that when considering the impact of a proposed development, planning decisions should ensure that developments add to the overall quality of the area and are sympathetic to the local character and history, including the surrounding built and historic environment. This is supported by Policies D1 and D2 of the development plan.

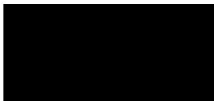
The proposal site is not considered a suitable location for this development; owing to its proximity to Regent's Canal, North Road Bridge and the surrounding conservation areas. The existing roof line is uncluttered and forms the background view of the adjacent heritage assets.

Developments should respect and where possible enhance panoramas and other views from within and outside the conservation area. Based on the reasons outlined above, it is not considered that the proposal enhances views within the conservation area and would create less than substantial harm to the adjacent heritage assets. Further, the proposal would result in the loss of planned green infrastructure upgrades to the host building.

It is considered that the impact arising from the proposed roof development would conflict with the aims of the development Plan, in particular policies D1, D2 and CC2, in that it would be harmful to the conservation area, its neighbouring heritage assets site and the wider biodiversity of the Borough. The public benefits would not outweigh the strong heritage constraints, and as such we would implore that the Council do not support the application.

We would be grateful if Camden Council could confirm receipt of this letter and continue to keep us notified on this application.

Yours sincerely,



**Clare Bambury  
Planner**

**DWD**

**DWD**

