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2024/5808/P	DPCAAC	01/02/2025 13:44:41	OBJ	

DPCAAC strongly objects to this revised application to install 3 taller antennas and highly intrusive ancillary equipment on the rooftop of Crestview, a six-story 1960's block of flats. Crestview lies on the crest of the Highgate Ridge and together with St Mary Brookfield is widely visible on the skyline from areas within and outside the DPCA. It can be seen from Parliament Hill, Hampstead Heath, Holly Lodge CA, Camden, Tufnell Park and beyond.

This application places the antennas around the white lift shaft housing which has been a recognisable feature of views of this building. The full height of this cluster of installations would be in excess of two and a half storeys of the dwellings themselves. The clean lines of the lift housing and the roof would be lost thus adding to the fundamental harm inflicted on the building by this installation and to the character and appearance of our CA. The setting of St John's CA which abuts the site on the Islington side would also be harmed.

Opposite Crestview, with an equal height roofline, lies the superb Grade II * listed St Mary Brookfield by Butterfield. The proposed installation would devastate the setting of this significant building and the skyline.

This application introduces serious harm to the character and appearance of our CA and should be refused.

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2024/5808/P	Margaret Shanks	02/02/2025 11:59:28	OBJ	

APPLICATION 2024/5808P

I object to application number 2024/58080P

Supplementary Information Form

In the application, in Supplementary Information Form it is stated that “It is noted the building has previously housed telecommunications apparatus on the building.”

However, it is not stated that, because the “building” [Crestview] is in a conservation area, all such apparatus had been removed prior to Waldon’s first and second applications. Indeed, Crestview began its efforts to have such apparatus removed as early as in 2016, documented in Management Meeting records. Consequently, all households adopted the use of internal aerials, enabling the removal of all apparatus from the roof.

This fact is clearly shown in the applicant’s photo in the previous applications, as well as in the (now out-of-date) photo with the incomplete building work on the front garden wall in this new application. However, Although these gross inaccuracies had been pointed out to the applicant in online comments, the applicant refers to apparatus on the roof, despite the fact that there was no apparatus. There is still no telecoms equipment on Crestview and in the design drawings the proposed items, albeit slightly fewer in number, are a large and unsightly addition.

When Waldon initially sent a letter to advise each Crestview household of Waldon’s new application, a letter was delivered to ‘Flat 13’ which does not exist; Despite the previous two unsuccessful applications, Waldon apparently was still unaware that there is no ‘Flat 13’.

This repeated error is only one of several other repeated, careless errors, for instance, including ‘PAPAPENT’ which does not exist in the English language and was presumably in error for PARAPET. This error appeared more than once on a design drawing and was signed on each occasion by the same three people. Such lack of attention to facts is inexcusable in the Application, to which I object.

Inaccuracies in Design Drawings

The applicant’s first application included various inaccuracies in the design drawings. These were pointed out in online comments which were available, and still are, for the applicant to read. They were also stated in the Case Officer’s report.

In the current application some of the same inaccuracies appear, and additionally new ones occurred. In Point 3 of the Supplementary Information Form the applicant states “The application site is a six-storey building in residential use.” This is correct. However, the drawing shows a seven-storey building with a balcony on each storey. Nine garages are depicted. The correct number of garages is eight.

These are the same inaccuracies as those in the first application. They are misleading, thereby making our building look larger.

I object to this Application

Code of Practice for Wireless Networks in England

A template of the certificate is available in the Code of Practice for Wireless Networks in England which was published on 7 March 2022.

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In accordance with the said Code, the applicant provides Confirmation that submitted drawings have been checked for accuracy, signed by Waldon (the Telecom Agent) - whose position is also Planner - on behalf of EE Ltd & H3G Ltd on 30/09/2021. The above errors show carelessness,; which is no recommendation for the applicant. It is hard to believe that they can count up to six and imagine there are seven.

Given the inaccuracies mentioned above, there is clearly a lack of thoroughness in this application. This raises doubts about the extent of the credence which can be lent to the applicant's arguments. They are not better than those in the previous unsuccessful applications.

ICNIRP

As the ICNIRP carries such weight internationally, the following is relevant:
<https://www.icnirp.org/en/rf-faq/index.html>

Under the question: What do you recommend for countries that have the ICNIRP (1998) RF EMF guidelines in place?

"The ICNIRP (1998) guidelines are protective for current commercial applications of EMFs. However, the new guidelines have incorporated a number of important additions and changes, particularly for EMF frequencies above 6 GHz where future 5G technologies will operate, which have the result of reducing the maximum magnitude of localized exposure that a person can receive. This is particularly important, given that we do not know how 5G technologies will develop in the future, and so a more robust system is required to ensure that harm cannot occur.

As the ICNIRP (2020) guidelines now provide "protection for whole body exposures above 6 GHz, ensure that brief exposures are not sufficient to cause harm, and, by reducing the averaging area for local exposures above 6 GHz, reduce the maximum local exposure, the new guidelines provide a far more complete and precise system of protection. Accordingly, and particularly in relation to current and future technological development such as 5G, it is strongly recommended that countries update to the new ICNIRP (2020) guidelines."

While planning applications for telecoms do not include health matters within their remit, it would probably be reasonable to accept ICNIRP's realistic view "that we do not know how 5G technologies will develop in the future."

Conservation Area

The current application introduces some changes to the apparatus, partly by its relocation from the edge of the roof to the "plant room", also called the "central plant room". However, as Crestview is within the Dartmouth Park Conservation Area, even with such relocation of apparatus, the change to the roof-form by the telecoms installations would still be unacceptable as they would be visible both from street level and public realm viewpoints. The installations would impact on the residential amenity of neighbouring buildings in terms of outlook.

Alterations to the roof-form are a matter of concern as they can be seen from a considerable distance within and beyond the Dartmouth Park Conservation Area.

Our block of flats is directly opposite the Church of Saint Mary Brookfield, which is a Grade II* listed building designed by William Butterfield and consecrated in 1875. The roof ridge line of the church is at an almost identical level with Crestview's. The impact of telecoms equipment on our roof would, therefore, cause visual

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harm.

Given their design and siting, their scale and height, the proposed incongruous antennae and accompanying fixtures would create dominant rooftop clutter. This would be detrimental to the character and appearance of the Dartmouth Park Conservation Area which is contiguous with St John's Grove (Islington) Conservation Area. Other nearby Conservation Areas are the Holly Lodge Estate Conservation Area and the Camden Highgate Conservation Area. The proposed telecoms installations would have a detrimental effect on the visual amenity of these Conservation Areas.

For ground-based installations under a GPDO, various detailed parameters exist, which are applicable to where the equipment is to be located, for example on a conservation area. This means that in previous applications not under a GPDO our arguments regarding visual harm in a conservation area still hold true.

As stated in Paragraph 7.1.1 of The London Plan of March 2021, "London's heritage assets and historic environment are irreplaceable".

Security

If this planning application were approved, it would entail providing total access to our building by giving keys to the telecoms maintenance/repair personnel to come and go at any time 24/.I strongly object to such access. This would cause great disturbance to all in Crestview, not only for installation works during the anticipated month starting on 2023-05 and completion on 2023-06, but also thereafter. Apart from the noise of the lift being used to the fifth floor, further noise would be created by lowering the metal ladder to access the roof space via a small hatch and then exit to the roof itself. It would be awkward for the personnel to access the roof.

Based on my comments above

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2024/5808/P	Pamela Hampshire	31/01/2025 15:15:25	OBJ	<p>I am a resident of Crestview and I strongly oppose this Application on the following grounds:</p> <p>Incorrect information: Despite the fact that inaccuracies in the Plans were pointed out in the responses to the two previous applications, they are still present in the Waldon submission. Even simple things like the extra garage and non-existent “existing Telecoms equipment” continue to appear on the plans. How can we have any confidence in the accuracy of the documentation submitted when these basic errors persist? Either this is shoddy work or it is a deliberate attempt to mislead members of the Planning Committee.</p> <p>Siting Crestview is located within the eastern border of the Dartmouth Park Conservation Area. As its name implies, it is on a crest in Dartmouth Park Hill and is therefore widely visible within this area, as well as within the St John’s Grove Conservation area in Islington (opposite). We are already a relatively tall building for the area, and the development would add significantly to our height and visibility. Measured from roof level, this would add the equivalent of three storeys to the height of the building. The Camden Local Plan 2017 requires any developments to take into account the wider historic environment and buildings, spaces and features of local historic value. I believe that the development, by reason of the location, number of pieces of equipment, height and design, would result in visual clutter which would cause significant harm to local views, in particular to the views of the adjacent Grade II* listed St Mary Brookfield Church, a building of similar height to Crestview. I understand that any development within a conservation area should preserve and enhance the character and appearance of the area and should not cause harm to the significance of a listed building through an effect on its setting. The Dartmouth Park Neighbourhood Plan 2020 places great emphasis on maintaining and enhancing the character of the area. It states (2.10): “...the people of Dartmouth Park wish to ensure that the area’s village character, rich architectural heritage, attractive green streets, open spaces and natural environment are not only maintained but enhanced”. I firmly believe that the proposals put forward in the Planning Application would contravene every aspect of the above policy statement. Crestview, by virtue of its location high up on Dartmouth Park Hill, is clearly visible in short, medium and long-range views from a variety of vantage points within the area, most notably from several locations on Hampstead Heath itself. We are also immediately adjacent to the St John’s Grove Conservation Area and the development would have a negative visual impact on this area, too. We are diagonally opposite the green open space of Dartmouth Park. Our current roof covering is insubstantial, and wholly unsuited to what is being proposed. Because of the specific nature of our building’s construction, the humming/buzzing noises and vibrations associated with the telecoms cabinets (x8) would likely transmit through our entire building structure, making the acoustic environment in Crestview homes intolerable. Actions normally taken to mitigate this are likely to have little impact. Noise from wind around the antennae may be audible not only to us but also to our immediate neighbours.</p> <p>Appearance The proposed installation is overly dominant, and entirely inappropriate for a small compact block of 18 flats. The height, bulk and massing of the structures would be disproportionate to the size of the building itself, and are likely to have an extremely negative impact on Crestview’s visual appearance. The proposed installation is even bulkier than in the last proposal, and there is still a huge amount of visual clutter. The exposed position of the building means that there would be no screening provided by surrounding trees or other buildings and would have a significant detrimental effect on the skyline. The Camden Local Plan 2017 requires developments to take into account the character, setting, context and</p>

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2024/5808/P	Irene Lunn	02/02/2025 21:36:32	OBJ	<p>the form and scale of neighbouring buildings as well as the character and proportions of the existing building, where alterations and extensions are proposed. I believe this development would impact severely on the appearance of the building and its own garden area, as well as being visible from many points in the conservation area, including Laurier Road, Dartmouth Park Hill, Dartmouth Park Road, and further afield. The height of the masts would significantly increase the visibility throughout the area.</p> <p>Health and Safety and Security:</p> <p>It appears that health concerns carry little weight in planning decisions, but I have concerns on both safety and security grounds. As I understand it the jury is still out on the long-term effects of 5G. Public Health England continues to monitor the health-related evidence and is committed to updating its advice as required, and the WHO is currently carrying out a major comprehensive evidence review. I would not feel happy living below equipment which could potentially be detrimental to residents' health. On the security side, both the installation and maintenance of the proposed equipment would entail other organisations having keys to our building. We do not have a resident caretaker and are responsible for our own building security. It would not be possible to monitor the increased comings-and goings, thus potentially making our building far less secure than it is now. In summary, I firmly believe that this proposal would result in significant harm to the local heritage assets, their settings and the setting of the Conservation Area. There are other buildings in the vicinity but outside the conservation areas which are commercial, not residential, and which would be much more suitable to house a development of this size and scope.</p> <hr/> <p>This will greatly affect the skyline and is inappropriate in a conservation area. It has been previously rejected for similar reasons. Its height will be almost the same as half the building.</p>