

**Objection/comment to the Waldon Crest View revised phone mast planning application, ref 2024/5808/P, by Hamish Birchall, submitted 08 February 2025.**

I strongly object to this latest application by Waldon (on behalf of its clients EE and H3G), as I did to Waldon's previous two such applications: 2021/0598/P and 2022/4190/P.

The grounds remain broadly the same, but due to the Prior Approval nature of the present application, I prioritise my objections as follows:

1. The application is not compliant with the relevant conditions of the General Permitted Development Order (GPDO).
2. Despite a reduced equipment manifesto, the visual impact is just as bad as before.
3. Implications of Grade II\* listed status of St Mary Brookfield Church.
4. Waldon's "loss of nearby site" rationale remains demonstrably false.
5. Dartmouth Park Hill reservoir remains a viable alternative site.

**1. Application not GPDO compliant**

Waldon state that the overall height of the installation would be "25.49 metres to the top of the antennas". (p7, Supplementary information form).

Waldon also state on the same page that the existing height of Crest View is 22.05 metres, meaning to the top of the small lift machinery and water tank housing. The main building height, again by their measurement, is 19 metres.

So, by their own estimate, the three antennae will stand 3.44 metres above the lift/water tank housing (and 6.49 metres above the main building height).

**The antennae height therefore exceeds the maximum 3 metres permitted under GPDO "Development not permitted", section A.1(2)(f)(ii), which provides:**

*"Development consisting of the installation, alteration or replacement of electronic communications apparatus (other than small antenna and small cell systems) on a building is not permitted by Class A(a) if ...*

*"(f) in the case of the installation of an antenna on electronic communications apparatus on a building on article 2(3) land ...*

*"(ii) the height of any antenna other than dish antenna to be installed would exceed 3 metres, or the number of such antennas which have been installed on the building since 21st August 2013 would exceed 3."*

**2. Visual impact just as bad**

Waldon argues that having reduced the number of antennae from six to three, the visual impact will be "minimal", and that in any case "... the equipment is not proposed to be located on a building of any architectural merit." (Supplementary Report, pages 1 and 10 respectively).

If Crest View is not of particular architectural merit, its prominence on the skyline for miles around is an excellent reason NOT to put large and ugly attachments on its roof.

Waldon add on p21 of the same document:

“The impact on both the host building and the surrounding area would be kept to an acceptable level. This will be illustrated in the following section, by the use of photomontages.”

But Waldon’s photomontage document is a wholly and, I would say, deliberately misleading visualisation of the proposed installation. For example:

- Only two antennae are shown when three are proposed.
- Their height is well below that in the Proposed site elevation plans.
- The antennae and fittings are represented in a pale grey, whereas in reality they would stand in stark silhouette against the sky.
- The negative visual impact on views of St Mary Brookfield church is absent due mainly to there being no views from the east or south, or from the Holly Lodge to the north west.

I attach photos I have previously used to illustrate the prominence and close proximity of both Crest View and St Mary Brookfield Church, a Grade II\* church.

### **3. Grade II\* listed status of St Mary Brookfield Church**

St Mary Brookfield Church qualifies as a heritage asset “of the highest significance”, according to section 213, Chapter 16 of the National Planning Policy Framework (NPPF).

Section 212 of the NPPF states:

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

And this applies to development within the setting of such heritage assets (also s213).

### **4. Waldon’s “loss of nearby site” rationale for choosing Crest View**

This is an entirely specious argument.

In an email to me dated 22 November 2024, Chris Andrews of Waldon confirmed that: “The Hill House site was decommissioned in January 2017.”

So, for eight years EE, 3 and MBNL have managed without Hill House. Moreover, nowhere does Waldon cite any customer complaints that their coverage has suffered.

### **5. Dartmouth Park Hill reservoir a viable alternative site**

Waldon consider but reject the Dartmouth Park Hill covered reservoir:

“A substantial greenfield site would be required which would have a greater visual impact than a rooftop site. In addition, there is a lack of space for an installation on the site.”

But this too is nonsense. The site is large, at the right height and within 50m of Crest View. Thames Water, the owner, has recently carried out major building works, providing deep concrete pillar supports around the reservoir perimeter.

It is eminently suitable for an imaginative use of disguised 5G mast installation as I argued in my objection, or a compact mast of the sort announced by Vodafone last year (Google “Vodafone unveils space-saving 5G mast design”).

### **Photos showing Crest View and St Mary Brookfield**

#### **View from Hampstead Heath:**



**View from Holly Lodge estate:**



**View from Brecknock Road (eg from south):**

