HERITAGE, DESIGN AND ACCESS SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	St Mary Brookfield	Site Address:	Church of St Mary Brookfield Dartmouth Park Road London NW5 1SL
National Grid Reference:	E528961 N186174		
Site Ref Number:	A01482	Site Type:	Macro

2. Pre Application Check List

Site Selection (for New Sites only)
(Would not generally apply to upgrades/alterations to existing sites)

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	**Yes**	No
If no explain why:		
Was the industry site database checked for suitable sites by the operator:	**Yes**	No
If no explain why:		

Annual Area Wide Information to local planning authority

Date of information submission to local planning authority	06.10.14
Name of Contact:	Gavin Polkinghorn
Summary of any issues raised:	Information of general rollout at the time within the authority sent to the LPA. No comments are noted as having been received.

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	27.05.15	
Was there pre-application contact:	Yes	**No**
Date of pre-application contact:		
Name of contact:		
Summary of outcome/Main issues raised: A pre-application consultation letter was sent to the LPA by email on 27 May 2015 which included site specific drawings and details of the proposed development. No response was received at the time of this application.		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	**Red**	Amber	Green

A pre-application consultation letter and draft drawings of the proposal were sent to Cllrs Sian Berry, Cllr Sally Gimson and Cllr Oliver Lewis, Ward Councillors of Highgate Ward on 27 May 2015. Consultation was also undertaken with Cllr Janet Burgess, Cllr Kaya Comerschwartz and Cllr Tim Nicholls Ward Councillors of the adjacent Junction Ward. Pre-application consultation letters were sent to residents and businesses within approximately 100 metres of the proposal site. A list of residential properties and businesses consulted is enclosed with the application. Details of the proposal were also sent to Kier Starmer MP of Holborn and St Pancras Constituency on 28 May 2015. Copies of the pre-application consultation letters can be provided if and when required.
Summary of outcome/Main issues raised: 7 responses were received requesting further information and citing concerns relating to; • Siting and appearance • Health and safety • Property values.

School/College

Location of site in relation to school/college *(include name of school/college):* Acland Burghley School – located approximately 250 metres south of the proposed site. La Sainte Union Catholic Secondary School – located approximately 465m west of proposed site. York Rise Nursery – located approximately 185m west of proposed site. The Spanish Nursery and Children's Centre for Culture and Language – located approximately 410m south west of proposed site. Ingestre Road Community Centre – located approximately 410m south west of proposed site.
Outline of consultation carried out with school/college *(include evidence of consultation):* Details of the proposal were sent to the Head Teachers and Chairs of School Governors of Acland Burghley School and La Sainte Union Catholic Secondary School. Letters were also sent to the managers of York Rise Nursery, The Spanish Nursery and Children's Centre for Culture and Language and Ingestre Road Community Centre on 28 May 2015.
Summary of outcome/Main issues raised: No response was received at the time of this application.

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?	Yes	**No**
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response: n/a Full Planning application		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No

Date served:	N/A – Full planning application

3. Proposed Development

The proposed site:
The proposal site is a gothic style brown brick church building located at the junction of Dartmouth Park Road and Dartmouth Park Hill. The building is approximately 20 metres high with a complex roof arrangement. It has a steeply pitched roof with gable ends. Several stone and red brick bands run vertically across the building. The west end and east gable walls of the building have 5-light tracery windows. The surrounding area is predominately residential in nature with a variety of building types. To the north of the site are residential properties facing onto Dartmouth Park Road. To the east and south are more residential properties facing onto Dartmouth Park Hill. Immediately adjacent the site to the west is the church vicarage and residential properties beyond.

Enclose map showing the cell centre and adjoining cells: Coverage Plots enclosed

Type of Structure	
Description: The proposal would comprise of the installation of 3no. antennas within 2no. GRP enclosures, radio equipment housing and ancillary equipment thereto. 2no. antennas would be installed within a replica GRP chimney extension. The existing disused brick chimney on the south eastern section of the roof would be reduced by 1 metre and rebuilt and extended with a replica GRP shroud to house proposed 2no. antennas. The remaining 1no. antenna would be installed within a GRP buttress extension located on the south west corner of the roof. The GRP buttress extension would be designed to resemble the existing pinnacle in a similar location on the opposite side of the roof. The scheme also includes the installation of radio equipment housing located internally within the basement. Refer to drawings for further details.	
Overall Height: 18.75m metres to top of buttress extension & 19.30 metres to top of replica chimney	
Equipment Housing: Flexi BTS/UCU	
Length:	560 mm
Width:	490 mm
Height:	625 mm
Equipment Housing: BTS 3900A x 2	
Length:	600 mm
Width:	480 mm
Height:	1400 mm
Equipment Housing: Samo	
Length:	750 mm
Width:	600 mm
Height:	1285 mm
Equipment Housing: Link A/C	
Length:	600 mm
Width:	500 mm
Height:	1200 mm
Equipment Housing: FCOA	
Length:	770 mm
Width:	770 mm
Height:	1550 mm

Tower/mast etc – type of material and external colour:	GRP enclosures – Brick colour coded to match existing disused chimney and pinnacle respectively.
Equipment housing – type of material and external colour:	Galvanised Steel/ untreated

Reasons for choice of design:

EE Ltd and Hutchison 3G Ltd currently have a site at Hill House, 17 Highgate Hill, London, N19 5NA. The Landlord has issued the operators with a Notice to Quit requiring the removal of the existing telecommunications apparatus from their premises due to redevelopment plans. Consequently this has resulted in the need for a replacement site to maintain the network coverage to this area pending the removal of the site at Hill House. An alternative site has been identified at Church of St Mary Brookfield, Dartmouth Park Road, Dartmouth Park, London NW5 1SL.

The choice of design in this instance has been influenced by the character and appearance of the subject building which is Grade II* listed, its siting within Dartmouth Park Conservation Area plus the technologies currently provided by the existing base station at Hill House. The proposal has been sensitively designed to respect the architectural and historical interest of the building and the extent of development kept to a minimum.

It is considered that the installation of the antennas within GRP shrouds would minimise the impact on the building and the surrounding area. 2no. antennas would be installed within a replica GRP chimney extension and 1no. antenna installed within a GRP buttress extension. The existing disused brick chimney on the south eastern section of the roof would be reduced by 1 metre and rebuilt and extended with a replica GRP shroud to house proposed 2no. antennas. The remaining 1no. antenna would be mounted within a GRP buttress extension located on the south west corner of the roof. The GRP chimney extension and GRP buttress extension will be designed and colour coded to resemble similar elements on the roof. The GRP chimney would mimic the design and appearance of the existing disused chimney at the point of installation and will be colour coded to match the existing chimney. The GRP buttress extension would be designed and colour coded to match the existing pinnacle topping the buttress on the opposite side of the roof that is positioned north of the proposed location of the buttress extension.

The existing disused chimney measures 18.60 metres to the top. The proposed chimney extension will measure 19.30 metres to the top. The height of the chimney will increase by 0.7 metres. The existing buttress currently measures 16.69 metres to the top. The buttress extension will measure 18.75 metres to the top which will result in an overall height increase of 2.06 metres. The applicant has taken advantage of the building's tall height whereby the GRP shrouds would not protrude above the roof's ridgeline which is 19.57 metres high.

It is considered that the careful positioning, design and height of the replica GRP shrouds will preserve the character of the building and minimise the impact on the surrounding area. It should be noted that all brickwork and other items removed from the building during construction will be stored in a secure area and reinstated in the future should the telecommunications equipment be removed.

The overall height of the antennas has been determined by the technical need to provide the antennas with the requisite height to satisfy coverage objectives whilst having regard to the physical characteristics of the building and surrounding area. The height of the antennas has been set at the minimum that would provide the required coverage to the target area whilst ensuring that the impact on the architectural and historic interest of the building and surrounding area is minimised. It should be noted that the antennas need to clear as much of the surrounding clutter as is possible in order to function effectively. The proposed antennas at a height of 17.08 metres and 16.80 metres respectively would ensure that the required network coverage is provided to the target area whilst minimising the impact on the building and surrounding area.

The equipment housing will be housed within the basement of the building thereby preventing visual clutter outside the church. The feeder cables from the equipment housing will run up through the disused chimney flue and exit via a new opening formed at main roof eaves level. The cables would

then run along the main roof gutter fixed to the inside face of the parapet wall and continue up to the chimney mounted antennas. It is considered that the careful fixing and positioning of the cables would ensure that they are not visible in street views and would preserve the character of the building.

It is considered that the proposed design would not harm the architectural and historic interest of the building and would preserve the character and appearance of the surrounding area. It is considered the proposal strikes a good balance between operational and environmental considerations.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached 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. When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, EE Ltd and Hutchison 3G each operates their networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of EE's and Hutchison 3G's network, the radio base station that is the subject of this application will be configured to operate in this way. 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 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.	**Yes**	No

4. Technical Justification

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

Reason(s) why site required e.g. coverage, upgrade, capacity

As previously mentioned, EE and Hutchison 3G currently have a site at Hill House, 17 Highgate Hill, London, N19 5NA. The Landlord has issued the operators with a Notice to Quit requiring the removal of the existing telecommunications apparatus from their premises due to redevelopment plans. Consequently this has resulted in the need for a replacement site to maintain the network coverage to this area pending the removal of the site at Hill House. The loss of this site would result in a degraded service and a reduction in capacity for EE and Hutchison 3G customers in this area.

The proposed site at Church of St Mary Brookfield would form an integral part of the EE and Hutchison 3G networks. The site is required to provide 2G and 3G coverage and capacity for customers in this area of Upper Holloway. The coverage plots enclosed with the application illustrate the predicted coverage from the proposal site and its relationship with the proposed and existing neighbouring cells demonstrating that it forms an integral part of the overall EE and Hutchison 3G network. The site is required not only to provide on-street coverage but also good quality in-building coverage which is increasingly important as there is a growing reliance by both businesses and households on mobile technology.

It can be seen from the coverage plot on slide 4 that the removal of the existing site at Hill House will result in a degraded in-building service for customers south of the roundabout at the junction of Highgate Hill, Holloway Road and Archway Road particularly in the area south of Bickerton Road and Pemberton Gardens. The coverage plot on slide 6 demonstrates the levels of coverage predicted from the site at Church of St Mary Brookfield. It can be seen from this plot that the levels of in-building coverage would be greatly improved particularly in the area north of the junction of Dartmouth Hill Park and Junction Road with the area surrounding the junction of Dartmouth Park Hill and Dartmouth Park Road predicted to receive the highest level of indoor coverage.

Although the site at Church of St Mary Brookfield does not replicate the existing coverage levels currently provided by the site at Hill House, it can be seen from the coverage plots that the replacement site albeit at a lower signal strength, would provide 3G outdoor and 2G in-building coverage to the area immediately surrounding Hill House and improve the in-building signal strength in the area south of Hill House.

In light of the above, there is a need for a base station in this area.

5. Site Selection Process

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 Type	Site Name & Address	National Grid Reference	Reason for not choosing
RT	St Johns Tavern, 91 Junction Road, London, N19 5QU	E529325 N186546	The proposal at this location would provide more inferior levels of coverage to the target area than the current option as it is located on slightly lower ground than the proposal site. This option has therefore been discounted in preference of the current option at Church of St Mary Brookfield.
RT	Archway Tower, 2 Junction Road, London, N19 5SZ	E529371 N186832	Despite numerous approaches to the Landlord, no response has been forthcoming. It is therefore considered that the Landlord is not interested in EE's and Hutchison 3G's proposal. Furthermore, the Landlord has plans to redevelop the premises. This option has therefore been discounted as EE and Hutchison 3G do not have the owner's permission to use their land.
RT	Hamlyn House, Highgate Hill, London, N19 5PH	E529313 N186846	The Landlord has plans to redevelop the premises and is therefore not interested in EE's and Hutchison 3G's proposal.
RT		E528993 N186726	Despite numerous approaches to the Landlord, no response has been forthcoming. It is therefore assumed that the Landlord is not interested in EE's and Hutchison 3G's

	St Peters Church, 124 Dartmouth Park Hill, London, N19 5HL		proposal. This option has therefore been discounted as EE and Hutchison 3G do not have the owner's permission to use their land.
RT	Hargrave Park School, 51 Bredgar Road, London, N19 5BS	E529065 N186672	Despite numerous approaches to the Landlord, no response has been forthcoming. It is therefore assumed that the Landlord is not interested in EE's and Hutchison 3G's proposal.
RT	Church of Pentecost UK, 30 Junction Road, London N19 5RE	E529349 N186728	This building is too low and would not provide the required network coverage to the intended area. Furthermore it is surrounded by taller buildings which would further impact on the coverage levels from this location.
RT	89 Junction Road, London, N19 5QU	E529334 N186575	Despite numerous approaches to the Landlord, no response has been forthcoming. It is therefore assumed that the Landlord is not interested in EE's and Hutchison 3G's proposal.
RT	37 Junction Rd Archway, London N19 5QU	E529376 N186708	Despite numerous approaches to the Landlord, no response has been forthcoming. It is therefore assumed that the Landlord is not interested in EE's and Hutchison 3G's proposal.
RT	34 Junction Rd, London, N19 5RE	E529341 N186701	Despite numerous approaches to the Landlord, no response has been forthcoming. It is therefore assumed that the Landlord is not interested in EE's and Hutchison 3G's proposal.
RT	Silver Court, 1 Bickerton Road, London N19 5JJ	E529267 N186463	The property owner(s) are not interested in EE's and Hutchison 3G's proposal.
RT	Brennands Court, Poynings Road, London, N19 5LE	E529123 N186308	This building is too low and would not provide the required network coverage to the intended area.
RT	Buildings on the North West of Station Road, London, N19 5UW	E529461 N186252	Despite numerous approaches to the Landlord, no response has been forthcoming. It is therefore assumed that the Landlord is not interested in EE's and Hutchison 3G's proposal.
GF	Land on the North West of Station Road, London, N19 5UW	E529507 N186340	It is not possible to identify a safe means of accessing the site that would meet health and safety requirements.
RT	All Saints Church, Tytherton Rd, London N19 4PZ	E529651 N186116	The Landlord has plans to convert the church to flats and is therefore not interested in the proposal.
RT	Tufnell Park Hall London Metropolitain University, Huddlestone Road, London, N7 0EG	E529434 N186143	Despite numerous approaches to the Landlord, no response has been forthcoming. It is therefore assumed that the Landlord is not interested in EE's and Hutchison 3G's proposal.
RT	Shaolin Temple, 207a Junction Road, London, N19 5QA	E529247 N186120	Despite numerous approaches to the Landlord, no response has been forthcoming. It is therefore assumed that the Landlord is not interested in EE's and Hutchison 3G's proposal.
RT	Holloway Bus Garage, 37 Pemberton Gardens, Upper	E529517 N186382	Despite numerous approaches to the Landlord, no response has been forthcoming.

	Holloway, London, N19 5RR		It is therefore assumed that the Landlord is not interested in EE's and Hutchison 3G's proposal.
RT	Maple House, 213 Junction Road, London N19 5QA	E529223 N186122	Despite numerous approaches to the Landlord, no response has been forthcoming. It is therefore assumed that the Landlord is not interested in EE's and Hutchison 3G's proposal.
RT	Middlesex University Archway Campus, 2-10 Highgate Hill, London N19 5LW	E529302 N186965	Despite numerous approaches to the Landlord, no response has been forthcoming. It is therefore assumed that the Landlord is not interested in EE's and Hutchison 3G's proposal.
RT	Roydon Mansions, 32 Junction Road, London, N19 3RE	E529336 N186735	It is not possible to identify a safe means of accessing the roof for build and maintenance that meets health and safety requirements.

If no alternative site options have been investigated, please explain why:

Additional relevant information (planning policy and material considerations):

Planning Policies

National Planning Policy Guidance

National Planning Policy Framework (2012)

5 - Supporting high quality communications infrastructure

The National Planning Policy Framework (NPPF) sets out Central Government's planning policies for England and how these are expected to be applied. It replaces a number of planning documents including Planning Policy Guidance 8 – Telecommunication. NPPF sets out the Central Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Pertinent to telecommunications development section 5 of NPPF sets out the Governments general overview regarding supporting high quality communications infrastructure and is stated as follows: -

"42. Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.

43. In preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.

44. Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. They should ensure that:

• they have evidence to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and
• they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and telecommunications services.

45. Applications for telecommunications development (including for prior approval under Part 24 of the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:
• 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 or technical site; and
• for an addition to an existing mast or base station, a statement that self certifies that the cumulative exposure, when operational, will not exceed International Commission on non-ionising radiation protection guidelines; or
• 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.

46. Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure."

<u>12 – Conserving and enhancing the historic environment</u>

Section 12 of NPPF sets out the Governments general overview regarding protecting the historic environment.

Paragraph 132 states that "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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."

133. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, 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:

● the nature of the heritage asset prevents all reasonable uses of the site;
and

● no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

● conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

● the harm or loss is outweighed by the benefit of bringing the site back into use.

134. 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 securing its optimum viable use.

It is considered that the proposed development would not cause substantial harm to or loss of the listed building and respects the architectural and historic interest of the building as demonstrated in this statement.

London Plan (2015)

It is acknowledged that the Mayor for London has adopted further alterations to the London Plan (FALP) in March 2015. The London Plan continues to set out the spatial development strategy for Greater London, in which it discusses the importance of ensuring that robust infrastructures are in place so as to support better connectivity and economic prosperity. Indeed the Mayor wishes to encourage broad-based growth and continues to support the telecommunications industry towards playing their part in a thriving, resilient and diverse capital city. A range of overarching policies from the London Plan are relevant to telecommunications development, whereby the benefits of mobile connectivity should be seen as an important material consideration, in contributing to the places and spaces in which Londoners live, work and visit. In this respect it is clear that telecommunication development is an integral component towards the delivery of the Mayor's vision and objectives as set out in the London Plan.

In Paragraphs 1.38-1.41 'Ensuring the infrastructure to support growth', the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to secure its long-term growth.

It is considered that the EE and Hutchison 3G networks are an integral element in securing the Mayor's vision for the delivery of modern communications networks and a connected economy across London. More specifically, the proposed development is consistent with and will help to implement the strategic objectives contained in Policy 4.11 'Encouraging a Connected Economy' and Policy 4.10 'New and Emerging Economic Sectors' of the Plan which are clearly supportive of the proposal.

London Infrastructure Plan 2015

The aim of the Infrastructure Plan is to enable for fast, ubiquitous access to the internet from mobile and fixed devices. Chapter 16 of the Plan indicates how the London Mayor's Office shall support an economically viable mix of technologies including fibre broadband, mobile broadband and future methods of wireless internet delivery to address the capacity crunch in the short term as well as aiming to make London the first capital city in the world to deploy 5G in the 2020s. This document is supported by the report Raising London's High Speed Connectivity to World Class Level. As detailed within these documents, Digital Connectivity is now considered the fourth utility. Internet access not only affects the productivity of businesses and proves essential to the future growth of many firms, it is also vital for many residents to take part in modern society (as more services move online).

The Mayor's Office shall work with central government and London's local authorities to ensure that strategic communication networks are enabled rather than inhibited by the planning and other regulatory systems (whilst ensuring the utility works themselves are properly managed).

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

Development Plan Policy

It is acknowledged that the Council's approach to the plan-led system has evolved. Central Government now seek to streamline the process for the preparation and adoption of Development Plans, in which Local Planning Authorities are now required to adopt a new Development Plan in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework. The Council has adopted a number of planning documents that (alongside the Mayor's London Plan) form the 'development plan' for Camden. Camden Council

is reviewing its main planning policies and is consulting on a draft 'Local Plan'. When finalised the Local Plan will replace the current Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.

There is currently no policy specific to telecommunications development in the council's development plan.

Other Relevant Policies

Policy DP25 – Conserving Camden's Heritage

Conservation Areas
In order to maintain the character of Camden's conservation areas, the Council will:

a) Take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
b) Only permit development within conservation areas that preserves and enhances the character and appearance of the area;
c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.

Listed Buildings
To preserve or enhance the borough's listed buildings, the Council will;

f) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;
g) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and
h) not permit development that it considers would cause harm to the setting of a listed building.

PLANNING ASSESSMENT

Site Selection
The siting of a telecommunications installation is constrained by both technical requirements and the physical characteristics of the area which restricts the size of the area in which it can be located. In this case, the site is needed as a replacement for an existing operational site and ideally would be required to be located as close as possible to the existing site in order to replicate the existing levels of coverage. However in this case, no suitable replacement site could be found in the vicinity of the existing site.

The search area is focused on the area in the vicinity of Junction Road that is located north of the junction of Dartmouth Park Hill and Junction Road and south of the Highgate Hill, Holloway Road and Archway Road roundabout. The area is made up of a mix of residential and commercial uses. A number of alternative sites have been investigated and discounted for various reasons as set out in Section 5 of this statement. No available telecommunications sites could be found in the area that can be utilised for the installation.

Following a thorough search of the target area and investigation of all the identified options, the proposal site at Church of St Mary Brookfield was selected as the best available option in the area that would provide the required coverage requirements to the area following the removal of the existing site

at Hill House. Although the proposal does not utilise an existing telecommunications site, it is sited on an existing building and is required to replace a site that already exists in the area thereby minimising proliferation. The proposal has dual user capabilities and as well as providing replacement coverage to the area surrounding Hill House, it would provide improved coverage to the area further south of Bickerton Road and Pemberton Gardens whereby balanced against the other material planning matters as below, it is considered that the scheme is acceptable.

Design, Siting and Appearance

We are mindful that the application site is sited at the boundary of Dartmouth Park Conservation Area and is a Grade II* Listed Building. In this regard, therefore it has been designed sensitively to respect the historic environment. Taking into account the character and appearance of the building and Conservation Area, the extent of development has been kept to a minimum. The operators are also seeking to install the smallest equipment commensurate with the proposed use.

In relation to the design, 2no. antennas would be installed within a replica GRP chimney extension and 1no. antenna would be mounted within a GRP buttress extension. The existing disused brick chimney on the south eastern section of the roof would be reduced by 1 metre and rebuilt and extended with a replica GRP shroud to house proposed 2no. antennas. The remaining 1no. antenna would be mounted within a GRP buttress extension located on the south west corner of the roof.

The GRP chimney would mimic the design and appearance of the existing disused chimney at the point of installation and will be colour coded to match the existing chimney. The GRP buttress extension would be designed to and colour coded to match the existing pinnacle topping the buttress on the opposite side of the roof that is positioned immediately north of the proposed location of the buttress extension.

The existing disused chimney measures 18.60 metres to the top. The proposed chimney extension will measure 19.30 metres to the top. The height of the chimney will increase by 0.7 metres. The existing buttress currently measures 16.69 metres to the top. The buttress extension will measure 18.75 metres to the top which will result in an overall height increase of 2.06 metres.

The equipment housing will be housed within the basement of the building thereby preventing visual clutter outside the church. The feeder cables from the equipment housing will run up through the disused chimney flue and exit via a new opening formed at main roof eaves level. The cables would then run along the main roof gutter fixed to the inside face of the parapet wall and continue up to the chimney mounted antennas. The cables would not be visible in street views and would not have any material impact on the building or surrounding area.

In terms of siting and appearance, the applicant has taken advantage of the building's tall height, whereby it is of note that the new GRP enclosures will not punctuate the roof's ridgeline or pitched roof of the building thus preserving the silhouette of the host building and keeping the skyline of the Conservation Area intact as illustrated by the photomontages enclosed. As shown on the photomontages, the GRP shrouds would be visible in Dartmouth Park Road and Dartmouth Park Hill, however given their modest size coupled with their position at height, it is considered that the presence of the GRP shrouds is likely to go unnoticed when seen in perspective from ground level.

Given its siting at the boundary of the Conservation Area, some views of the proposal will be out from the Conservation Area into areas which the council considers to have less visual/historic amenity. We consider that this should be given some weight as the impacts on the wider Conservation Area will obviously be less than if the proposal were to be located central to the Conservation Area.

The proposed development may be visible from some of the nearby properties in Dartmouth Park Road and Dartmouth Park Hill however given the sympathetic design of the scheme and siting of the GRP shrouds away from the main road, it is considered that any impacts on the visual amenities of the occupiers of these properties would not be significant.

Access
Given the siting of the proposal on the roof of a building, the site will only be accessed by those personnel associated with the applicant. In light of the intended use to provide mobile phone coverage, the public should have no interest or need to access the base station. Therefore it should be recognised that access to the proposal is set well away from recognised public rights of way and is remote from recognised pedestrian and vehicular movements within the public realm.

The applicant will make use of on-site and existing internal routes during construction and maintenance.

Heritage Statement
Church of St Mary Brookfield is Grade II* Listed and was first listed on 10 June 1954. The church was built in 1869-75 by William Butterfield in the decorated Gothic style. The building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

The building is situated at a high point on the corner of Dartmouth Park Road and Dartmouth Park Hill. The church is approximately 20 metres high and has a complex roof arrangement with steeply pitched roofs with gable ends. It is a brown brick building with red and black diaper bricks. It has several stone and red brick bands running vertically across the building. The west end and east gable walls of the building have 5-light tracery windows.

In view of the building's architectural and historic interest, the proposed antennas will be installed within GRP shrouds and the equipment cabinets housed internally within the basement. As previously mentioned, the design of the scheme respects the architectural interest of the building and does not undermine those specific features as listed that justify the site's designation. The antenna shrouds have been carefully sited ad designed to ensure that they blend in with other features on the roof. 2no. antennas would be installed within a replica GRP chimney extension which would make use of the disused chimney on the south eastern section of the roof. The disused chimney will be reduced by 1 metre and rebuilt and extended with a replica GRP shroud to house the proposed 2no. antennas. The remaining 1no. antenna would be installed within a GRP buttress extension located on the south west corner of the roof. The GRP buttress extension would be designed to match the existing pinnacle immediately north of the proposed buttress extension location. The height of the replica chimney would be 0.7 metres taller than the existing disused chimney. The proposed buttress extension would be 2.06 metres taller than the pinnacle on the opposing side of the roof.

It is acknowledged that the building makes a major contribution to the streetscape and is visible from many points as mentioned in the Dartmouth Park Conservation Area Appraisal and Management Statement. The proposed GRP shrouds will be visible in street views however it is considered that the proposed apparatus would be seen in conjunction with similar features on the roof. The height of the installation has been kept at the minimum that would meet the required technical requirements whilst minimising the impact on the architectural and historic interest of the building.

The equipment housing will be housed within the basement of the building. The feeder cables from the equipment housing will run up through the disused chimney flue and exit via a new opening formed at main roof eaves level. The cables would then run along the main roof gutter fixed to the inside face of the parapet wall and continue up to the chimney mounted antennas. The cables will not be visible in street views.

In light of the above, it is considered that the proposal will have a negligible visual impact on the character and appearance of the Conservation Area and would not cause harm to the special interest of the Grade II* Listed building or its setting. It is considered that the visual impact of the proposed development would not outweigh the public benefits from improved mobile phone coverage. When balanced against the other material planning matters, it is considered that the scheme is acceptable. Taking into account the national and local planning policies which are now applicable, it is considered that the proposal accords with National Policy and the Council's Development Plan.

Health & Safety
The proposed radio base station will be operated in accordance with the radio frequency or electromagnetic field exposure guidelines stipulated by the European Union.

A declaration of ICNIRP compliance is provided as part of this planning submission.

Summary
There is a requirement for EE and Hutchison 3G to provide continued 2G and 3G network coverage in this locality following the removal of the existing site at Hill House, Highgate Hill, London. It has been demonstrated that the proposal site at Church of St Mary Brookfield is the best available option to fulfil the required network coverage in the area. The proposal has dual user capabilities and will facilitate mast sharing.

When balanced against all material factors of this case, it is considered that the proposal's siting and appearance will not have a significant impact on this designated heritage asset. The proposal strikes a good balance between operational and environmental considerations and respects the historic qualities of the site and its surroundings, whereby it would not undermine those specific features as listed that warranted the site's designation.

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