

Planning Application Comment

Comments, Responses and Objections to Planning Application 2016/1550/P

Save West Hampstead “Stop the Blocks!” Campaign

Save West Hampstead



Dear Sir / Madam

We write to strongly object to the proposed installation of high-powered industrial telecommunications equipment on the roof of Canterbury Mansions in Lymington Road, as outlined in Planning Application 2016/1550/P, lodged by GVA Grimley Ltd on behalf of Telefonica 02 UK Ltd / CTIL.

We write on behalf of the Save West Hampstead "Stop the Blocks!" Campaign, Lymington Road Residents' Association, the Lymington Road Tenants' Association, residents of the West End Green Conservation Area and on behalf of the many hundreds of individuals who have previously lodged planning applications via the Save West Hampstead "Stop the Blocks!" campaign to another local planning application (2015/6455/P).

We request that the application is refused for the reasons outlined below.

Insufficient exploration of alternative sites

We note the applicant has attempted to explore other potential installation sites in the locality, however all sites explored are predominantly residential in nature and, further, immediately adjacent to other additional residential properties.

It is clear that no significant effort has been made by the applicant to locate non-residential sites away from adjacent and densely populated residential premises on which industrial telecommunications equipment could instead be better sited.

That it is stated, "CTIL have searched in this area for a number of years for an infill site without any success." is a clear indication that the application is a last ditch attempt to install telecommunications equipment in an area that is obviously averse to the installation of such. We strongly urge that the wishes of the local community — as evinced by the applicants' inability to locate another site — are upheld by the council and that this application is refused.

Community fears of risks to health

Despite outlining in the planning application how telecommunications are sharing infrastructure, the application itself is in addition to existing industrial telecommunications infrastructure already situated on the roof of Canterbury Mansions. The applicant gives no account of the cumulative impact of their proposal in addition to the equipment already located on site.

While it is understood that the potential for negative effects on the well-being of residents is not considered to be a material planning consideration, discussions with local residents and residents' associations have revealed genuine fears of risks to health — particularly from those with young children — and these must be taken into account by planners. The applicant notes the existence of such concerns in their application and that current wisdom dictates that “that continued research is needed since mobile phones have been in widespread use for a relatively short time.” A distinction should be made here between the relative low power requirements and intermittent usage of mobile phones and the proposed permanent installation near to residential accommodation of high-powered industrial telecommunications antennae.

It is widely acknowledged power density can often exceed guideline levels close to high-powered base station antennas. As such, locating industrial telecommunications equipment in densely populated residential areas is recognised to be ill advised and a last resort of extreme measures rather than the first port of call. As such the application should be refused.

It should be noted that residences in Canterbury Mansions fall within the applicant's stated public exclusion zone of the proposed equipment, as do residential premises in adjacent residential properties in Lymington Road including — but, given potential power fluctuations — not limited to, 2 Lymington Road, Lymington Mansions, Sandringham Mansions and Sandwell Mansions.

Consideration should also be given to the Council's own plans outlined within its Site Allocations Document for additional residential premises on the site of the former Camden Council offices at 156 West End Lane, immediately adjacent to Canterbury Mansions. A pending but currently stalled application (2015/6455/P) proposes to replace the existing office building with accommodation units for young families.

Negative Impact on Heritage Conservation Area, Visual Impact and Loss of Amenity

The applicant has failed to provide 3D images of how the proposed installation would appear from various viewpoints and vantage points in the area. Given that the proposal is to site the masts within the West End Green Conservation Area and that a large number of viewpoints and vantage points of the site exist from many dozens of residential premises in the Conservation Area, nobody is currently in any position to fully determine the negative visual impacts of the equipment and the loss of amenity caused by the proposed installation.

The main issue to be considered is the harm to the visual amenities of the area and/or the living conditions of nearby residents that might be caused by the height and appearance of the equipment. Clearly, both will be significantly negatively impacted by this application.

Design principles must be regarded as important considerations in respect of telecommunications development, particularly when installing equipment on and around buildings of significant historic and architectural importance such as those within the West End Green Conservation Area.

The applicant states: “The pole mounts are located away from the building frontage and are located at the rear of the building away from public vantage points.” While this might mitigate somewhat against impacts on visual amenity from public vantage points on West End Lane, it does nothing to mitigate the impacts on such from within the West End Green Conservation Area and the residential premises that lie within this protected heritage asset, nor from immediately adjacent mansion blocks on Lymington Road and West End Lane and those slightly further afield but also situated within the Conservation Area to the north including Honeybourne Road and the mansion blocks at the northernmost end of West End lane.

It is clear that:

- A proper assessment of the area has not occurred,
- No substantive analysis has been performed of near and far views both within and without the Conservation Area,
- The proposals do not respect near and far views in relation to distant views into and out of the Conservation Area,
- No attempt has been made to minimise the contrast between industrial

telecommunications equipment and the architectural heritage of a Victorian/Edwardian conservation area.

The application contravenes Policy CS14 – Promoting high quality places and conserving our heritage and Policy DP25 – Conserving Camden’s heritage.

Furthermore, while the applicant maintains that the proposal will not be visible from ground level, this statement disingenuously omits to factor in that property in the Conservation Area comprises of three to five storey buildings and, further, that the installation site is at the lowest point of the Conservation Area such that it will be easily visible from a significant proportion of the Conservation Area.

Consultation

We note that the applicant states, “Consultation was carried out with the local planning authority and Councillors Pober, Rosenberg and Yarde (by email) and to the Local Planning Authority. To date no responses have been received.”

We note with interest the worrying lack of a response from Councillor Pober. Furthermore, we fully expect Councillors Rosenberg and Yarde to represent the wishes of the local community in their capacities as members of the Planning Committee by ensuring this application is refused when it comes before the Development Control Committee.

Planning History

While the applicant correctly notes an application for industrial telecommunications equipment on the site, namely 2014/5274/P, the installation referenced is from a different telecoms operator and comprises significantly less equipment of significantly smaller proportions and capacity. The applicant proposes to further add another operator’s equipment to that which is already on site and has provided no indication of the cumulative impact of such a proposition.

However, it should be noted that data provided by the applicant clearly demonstrates that residential premises will fall within the public exclusions zones for the proposed equipment — both within the building on which it is proposed the equipment is installed, as well as adjacent buildings — and, as

such, the application should be refused.

We disagree strongly with the applicant's conclusion that "this proposal has been sensitively sited" as they have stated elsewhere in the application that this is not the case after searching "for a number of years" for a site in which to position their equipment.

On the grounds outline above, we request that this application is refused.

We would like to be informed of any further updates to this application and to be notified of when this application is due to be presented to the planning committee.

Kind regards,

Save West Hampstead "Stop the Blocks!" Campaign

Web: www.savewesthampstead.weebly.com

Blog: www.savewesthampstead.wordpress.com

Twitter: www.twitter.com/SaveWHamp

Email: SaveWestHampstead@gmail.com



To Camden Planning Dept. FAO: Jagdish Akhaja

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While it is understood that the potential for negative effects on the well-being of residents is not considered to be a material planning consideration, discussions with local residents and residents’ associations have revealed genuine fears of risks to health — particularly from those with young children — and these must be taken into account by planners. The applicant notes the existence of such concerns in their application and that current wisdom dictates that “that continued research is needed since mobile phones have been in widespread use for a relatively short time.” A distinction should be made here between the relative low power requirements and intermittent usage of mobile phones and the proposed permanent installation near to residential accommodation of high-powered industrial telecommunications antennae.

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Road including — but, given potential power fluctuations — not limited to, 2 Lymington Road, Lymington Mansions, Sandringham Mansions and Sandwell Mansions.

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Negative Impact on Heritage Conservation Area, Visual Impact and Loss of Amenity

The applicant has failed to provide 3D images of how the proposed installation would appear from various viewpoints and vantage points in the area. Given that the proposal is to site the masts within the West End Green Conservation Area and that a large number of viewpoints and vantage points of the site exist from many dozens of residential premises in the Conservation Area, nobody is currently in any position to fully determine the negative visual impacts of the equipment and the loss of amenity caused by the proposed installation.

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The application contravenes Policy CS14 – Promoting high quality places and conserving our heritage and Policy DP25 – Conserving Camden's heritage. Furthermore, while the applicant maintains that the proposal will not be visible from ground level, this statement disingenuously omits to factor in that property in the Conservation Area comprises of three to five storey buildings and, further, that the installation site is at the lowest point of the Conservation Area.

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Ian Ferrie

14a Lymington Road NW6 1HY



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Bridget Dunne

18c Lymington Road NW6 1HY