

# STUDIO ASTRAGAL

## 1 - 22 REGENT'S PARK TERRACE, LONDON, NW1 INSTALLATION OF SECURITY CAMERAS - PLANNING STATEMENT



1-22 Regent's Park Terrace, view from south

## 1. Introduction

The group of buildings comprising Nos. 1 – 22 Regent's Park Terrace is listed Grade II with Group Value and is located in the Primrose Hill Conservation Area. Its listing makes it of National importance, although it is not as important as a Grade I or Grade II\* building. The Statement of Heritage Significance produced by Studio Astragal Ltd assessed the building in general and the front elevation and its original features in particular, as being of High Heritage Significance, primarily for its architectural significance. It was noted that the front façade was generally free of modern visual clutter, such as cabling, satellite TV dishes, gas flues and burglar alarms, the last of which are generally confined to the basement level.

The proposal is to install four pairs of security cameras in four locations underneath of the balconies. These would be set half way back from its front edge. They would be connected to a single black CAT6 cable fixed with black cable ties to the bottom of the cast iron balcony railings. This supplies power as well as communicating to a dedicated PC computer in one of the houses.

## 2. National and Local Planning and Conservation Policies Relating to Security Cameras

The following policy documents are relevant:

### National Policy and Guidance

The relevant policy and codes of practice documents are:

**The National Planning Policy Framework (NPPF).** This does not give detailed advice, but Section 134 is relevant to the assessment of the proposal. This states:

“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.”

### BSI Standards Publication BS 7913:2013 – Guide to the Conservation of Historic Buildings, British Standards Institute

This also gives no guidance on small modern fixtures and fittings such as CCTV cameras. Its general guidance is:-

#### “6.16 Alterations

Alterations should be carried out only if there is no suitable alternative option. They should be designed to minimise their impact on the significance of the historic building, and should avoid losing features that contribute to that significance.

The principle of reversibility should be used, ....”

### Historic England Policy Guidance:

#### Making Changes to Historic Assets – Historic England Advice Note 2

This does not provide any guidance on small items of modern equipment such as CCTV security cameras. The nearest it gets to advising on small modern alterations is the following:-

“52 Although some works of up-grading, such as new kitchens and bathroom units, are unlikely to need consent, new services, both internal and external, can have a considerable, and often cumulative, impact on the significance of a building and can affect significance if added thoughtlessly. The impact of necessary services can be minimised by avoiding damage to decorative features, by carefully routing and finishing and by use of materials appropriate to the relevant period, ...”

### Conservation Principles – Policies and Guidance for the Sustainable Management of the Historic Environment

This does not give any specific detailed guidance about alterations to listed buildings. Its general principle states:-

#### “New work and alteration

138 New work or alteration to a significant place should normally be acceptable if:

- a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;

- b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;
- c. the proposals aspire to a quality of design and execution, which may be valued now and in the future;
- d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future.”

### **Heritage Crime Prevention Measures: A Guide for Owners, Tenants and Managers of Heritage Assets**

This encourages owners of heritage assets to install CCTV cameras to protect the asset against heritage crime, but does not give any detailed design advice. It states:-

#### **“10. Strengthen formal surveillance**

....

- 5. You may wish to invest in CCTV cameras. These can be linked to loud speakers so that direct communication with the offender can take place to alert them to your knowledge of their presence. Ensure that the resolution is sufficient to enable identification of offenders from recorded images at a standard acceptable as evidence at court. ...”

### **Local Policy and Guidance**

#### **LB Camden’s Core Strategy and Development Policies**

These were adopted in 2010. It does not contain detailed policies relating to CCTV cameras. The relevant policies, which are very general are:-

#### **“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 or enhances the character and appearance of the area; ....

##### **Listed buildings**

To preserve or enhance the borough’s listed buildings, the Council will:

....

- f) 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 ...”

#### **LB Camden’s Draft Local Plan**

The Camden Local Plan will replace the Council’s current Core Strategy and Development Policies planning documents. This was submitted to examination in public in June 2016.

The relevant general policies are:-

#### **“Policy D2 Heritage**

In order to maintain the character of Camden’s conservation areas, we will:

- a. take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
- b. require that development within conservation areas preserves or enhances the character or appearance of the area; .....

##### **Listed Buildings**

“To preserve and enhance the borough’s listed buildings, we will:

- ....
- g. resist proposals for a change of use or alterations and extensions to a listed building where it considers this would cause harm to the special architectural and historic interest of the building; and .... “

Section 7.73 of the Draft Plan states:-

**“Street furniture and the public realm**

7.73 Street furniture includes objects placed on the street including traffic signs and signals, benches, street names, CCTV cameras, lighting, cycle parking, guardrails, bollards, and bus shelters. The Council aims to reduce visual street clutter reducing the number of objects on the street, rationalising their location, and limiting the palette of materials. Free-standing signs and signs on street furniture will not normally be accepted where they contribute to visual and physical clutter and create a hindrance to movement along the pavement or pedestrian footway.”

This does not apply to cameras located on private buildings and the draft plan does not give any specific detailed guidance on this matter.

**L B Camden’s Conservation Area Statement 5 – Primrose Hill**

Whilst this contains guidelines for developments in the conservation area, unfortunately it does not provide any guidance on CCTV security cameras either.

**Summary**

As can be seen above, whilst national and local policies seek to protect listed buildings from harmful alterations, they give no design guidance in respect of CCTV cameras on listed buildings. The general advice is that proposals should be carefully designed and services (e.g. electric cabling) should be carefully routed to minimise their impact.

**3. The Proposals**

Eight small dome cameras are proposed in four locations at Nos. 1, 6, 12 and 17 Regents Park Terrace. The Lilin IPR320X cameras are 130 mm by 110 mm in size and are relatively small for security cameras. They would be mounted on the underside of the balcony and set half way back from the front edge.

The single black cable will run from No. 1 to No. 17. This will be run above the balcony behind the bottom transom of the black cast iron railings and down through holes through the balcony to connect to the cameras below.

The balcony is formed of stone and is cantilevered without supporting brackets. Great care will be taken in fixing the cameras to ensure that the stone is not cracked in the process. This will be done without the use of percussion hammer drilling and using a diamond drill bit. Only stainless steel screws will be used and plastic rawl plugs to avoid rusting which would stain the masonry and risk splitting the masonry due to rust expansion. In the event that the cameras became unnecessary the holes could be filled by injecting a slurry of fine sand, stone dust and hydraulic lime.



The Proposed Camera Locations

Pro series | Outdoor Vandal Dome Camera

# IPR320X

## Day & Night 1080P HD Vandal Dome IR IP Camera

www.meritlilin.com



**HD**

**ONVIF S**

As with all Pro series cameras, the Day & Night 1080P HD VR Dome IR IP Camera IPR320X incorporates Sense up+, a unique technology that successfully delivers stunning video in low-light conditions. Utilizing intelligent image signal processing, AGC control, and 3D Noise Reduction, this model successfully delivers the ultimate low-light image without motion blur. The IPR320X is capable of producing four independent video streams, different streams can be set for different applications, depending on the individual user requirements. The IP66-rated housing is designed to help the camera body withstand rain and dust and ensures operation under a multitude of harsh weather conditions.

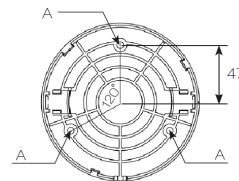
Easy to install 	H.264 	Back Light Compensation 
IP66 	Day / Night 	IK7 
IP based 	WDR 	IR Infrared night vision 

- ▶ Outdoor vandal dome
- ▶ IP66 rain and dust resistant
- ▶ Wide Dynamic Range
- ▶ IK7 impact resistant
- ▶ On-board Infrared lights – The camera can view up to 25 metres at night
- ▶ IR cut filter for day/night operations
- ▶ 1080p video resolution
- ▶ 3-year warranty and support

**Dimensions (unit in mm):**  
Ø 130 x 115



**Diagram of mounting holes (unit in mm):**



A (M3.0\*25, wooden screw)

### Details of the Proposed Dome Cameras

#### 4. The Need

The terrace and the surrounding area has been the subject of significant amounts of crime and anti-social behaviour. The Metropolitan Police’s Camden Town Safer Neighbourhood Team supports the proposals and states that “We are fully aware of on-going anti-social behaviour

within their immediate area and the installation of CCTV would in our view assist in the prevention of crime and anti-social behaviour. The installation of CCTV would also allow the residents to feel more secure and safe in their own homes with the added prevention of crime.”

## **5. Assessment of Impact and Justification.**

The cameras would be visible from the private road of Regent’s Park Terrace, but as the terrace is set back behind trees, they would not be significantly noticeable from Gloucester Crescent or Oval Road. It is considered that they would not have a significant impact on the wider Primrose Hill Conservation Area. Their visibility would be minimised by painting the cameras to match the masonry. The cable would be concealed and not visible from the street.

The proposed cameras would have a small negative impact on the relatively unaltered and uncluttered front façade, albeit not substantial. They would not result in any loss of original fabric or features or any alteration to these other than some small holes drilled into the balcony. Moreover, the development would be reversible in the event that technological developments or changing social conditions render them obsolete.

Using the heritage impact assessment methodology set out in Section 5.6.5 of BS 7913:2013 – Guide to the Conservation of Historic Buildings, which is derived from the ICOMOS document – Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, the proposals would have a “Minor” impact on the heritage asset whose value is “High”, resulting in a “Slight/Moderate Adverse Impact”.

However, it is considered that the proposal would cause “less than substantial harm to the significance of a designated heritage asset” and that this is outweighed by the public benefits of crime prevention (National Planning Policy Framework Section 134). Being a nationally important heritage asset, the protection of this Listed terrace from damage resulting from crime and anti-social behaviour is considered to be a public benefit that extends beyond the protection of the residents of the terrace.

## **6. Other Buildings in Conservation Areas in the Locality with Security Cameras**

A survey of security cameras in the surrounding area found was carried out. Few were found. Those found in the vicinity are shown in Appendix 1 below.

The cameras found are generally in fairly prominent locations on the buildings and generally not well positioned in relation to architectural features. Some of the cameras are bulky, obtrusive and unattractive. In our opinion they are almost all not examples of best practice and not good precedents to follow. In comparison to these examples the proposed scheme is significantly more sensitive to the special character of Regent’s Park Terrace. A considerable amount of visual clutter of poorly sited gas boiler flues, burglar alarms, floodlights and inappropriate door lamps were noted in the area. The proposed cameras are considered to be less harmful than this.

## **7. Research of the Planning Register to Identify Relevant Decisions in Respect of Security Cameras in the Locality.**

In order to assess how LB Camden implements the above-mentioned policies in relation to security cameras a keyword search of LB Camden’s online planning records for applications for Listed Building Consent for CCTV security cameras was carried out. The keywords were “security camera”, “security cameras”, “CCTV camera”, and “CCTV cameras”. Given the vagaries of keyword searches and data entry it cannot be guaranteed that all the relevant decisions were captured. The search found 83 grants of Listed Building Consent for security cameras or wider schemes including security cameras, including 2 relating to variations of conditions, 2 part Grants/Part Refusals, 15 Refusals and 6 Pending applications between 1990 and 2016 for, or including, security cameras (see Appendix 2). The reasons for refusal may not necessarily relate to the cameras in wider development proposals. Several consents were for large numbers of external cameras. Withdrawn applications have not been included. As applications that officers have advised are likely to be refused are often withdrawn, this may have skewed the results. In implementing their general policies, LB Camden clearly does not apply a general presumption against cameras on Listed Buildings and has granted Planning Permission and Listed Building Consent for more visually intrusive cameras.

## **8. Conclusion**

The proposed cameras are generally less bulky and more sensitively located than many existing cameras in the area. LB Camden has granted consent for bulkier cameras in its area. Whilst the proposal would result in a slight/moderate adverse impact on the listed buildings, they would result in “less than substantial harm” and this is outweighed by the public benefits of crime prevention, which include protection of a nationally designed heritage asset of high significance.

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**Appendix 1 : Photographs of Examples of Security Cameras in Surrounding Area**



6, Park Village East. Early 19<sup>th</sup> C (1825-36) semi-detached villa Listed Grade II\*. Regent's Park Conservation Area.



10 Park Village East. Early 19<sup>th</sup> C (1825-36). Detached villa Listed Grade II\*. Regent's Park Conservation Area.



14 Park Village East. Early 19<sup>th</sup> C (1825-36). Detached villa Listed Grade II\*. Regent's Park Conservation Area.