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Planning and Public Protection
Culture and Environment
Camden Council
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Argyle Street
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3rd August 2017

Ref: NM / 00001 / Camd 1

Dear Sirs,

Objection By Cognita Schools Ltd, Owners of North Bridge House Senior School, 65 Rosslyn Hill, Hampstead NW3 5UD

Regarding: Application 2017/0969/P

For: Installation of 4 antennas and 6 cabinets on faces of chimney on eastern corner, 2 antennas and 3 cabinets on faces of plant room on western corner, 4 equipment cabinets on roof of northeast side plus associated 1.1m high handrail walkway across roof, and one meter cabinet on ground at southwest elevation

Location: Henderson Court, 102 Fitzjohns Avenue, London NW3 6NR

On behalf of Cognita Schools Ltd, the owners of North Bridge House Senior School, which is a neighbouring use located at 65 Rosslyn Hill, we would like to submit a formal objection to planning application 2017/0969/P.

To assist I have broken down the objection into a number of matters/considerations in the determination process.

National Planning Policy Framework (March 2012) (NPPF)

The NPPF sets out clearly the rational and aim of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. Through paragraph 43 it states:

"in preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunication and high speed broadband. They should however aim to keep the numbers of radio and telecommunications masts and 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 a new site has been justified"

it goes on to make it very clear that where new sites are proposed, as is the case here, they should be sympathetically designed and camouflaged and be of a scale commensurate. The level and scale of masts proposed fails to meet in any way this objective and would be extremely detrimental to not just the school,

its pupils but the surrounding neighbourhood and environment. This objection sets out the case in more detail below:

The Requirement For Telecommunications In the Area

Maintaining both the historic and residential character of the site, the area and the Fitzjohns Conservation Area character depends greatly not on the uses buildings are put, but also how they are used, maintained and serviced. The character of a residential or other building in a Conservation Area can best be safeguarded if the existing residential use is maintained.

The introduction of new masts, cabinets and railings should be located as per NPPF and Circular advice and concentrated on existing building where these features are already prevalent. The proposed location, height and setting would introduce an entirely new and major set of communications equipment on this flat roofed residential block, contrary to this guidance.

Alternative Locations to Site Telecommunications Masts and Equipment

It is considered that there are other more suitable locations, including existing mast sites within the area, which would be more appropriate for siting of this level of equipment.

Visual Impact of Proposal

The installation of the antennas, cabinets and hand railing will have a physical and adverse impact on residential amenity. It is considered that the development would be highly visible not just from the surrounding properties, but also the street scene and the Fitzjohns Conservation Area. This would adversely impact both on the existing residential block, the street scene and the Conservation Area.

Precedent

The approval of the proposed development would set a major and unwelcome precedent making it difficult to resist similarly inappropriately sited telecommunications development in residential properties in the Conservation Area. The cumulative effect of this development with others would be materially detrimental to 'preserving or enhancing' the character and appearance of the Conservation Area and would be contrary to Camden Council planning policies, in particular Policy D2 Heritage of the Camden Local Plan July 2017.

Policy D2 Heritage advises:

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

The current proposal before the Council is contrary to Policy D2 Heritage.

Health Issues

It remains Central Government's responsibility to set out the framework and responsibility to decide on measures to protect public health. However, there are both actual and perceived health effects from masts, which is emerging and has been assessed and set out through different forms of guidance. The Stewart Report 2001, through paragraph 6.68 recommends a precautionary approach and states clearly that masts should not be near schools, near the homes of children or other vulnerable people. Equally, *Southampton City Council v Hutchinson* 3G Orange in 2003 (R.V. Stockport MBC ex parte Smith CO/159/2001 confirmed this approach). Given the surrounding uses

Policy C1 Health and Wellbeing of the Camden Local Plan through paragraph 4.6 sets out to 'The creation of healthy environments for people of all ages across the borough will be a key consideration when the Council assesses planning applications' should be considered. The proposal is poorly sited in relation to both residential and school use and is considered to be contrary to Policy C1 Health and Wellbeing of the Local Plan July 2017.

For the reasons stated above we respectfully request that planning permission is refused for the above development.

Kind regards

Yours faithfully

Neil Macdonald