

<b>Delegated Report</b>		<b>Analysis sheet</b>	<b>Expiry Date:</b>	<b>18/10/2017</b>
		N/A	<b>Consultation Expiry Date:</b>	<b>21/09/2017</b>
<b>Officer</b>			<b>Application Number(s)</b>	
Sofie Fieldsend			2017/3674/P	
<b>Application Address</b>			<b>Drawing Numbers</b>	
Parkside Court 7 Gloucester Avenue London NW1 7AT			See Draft Decision Notice	
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>	
<b>Proposal(s)</b>				
Installation of 6 antennas and 6 cabinets on roof with associated GRP screens, plus 1 cabinet and associated works at ground level.				
<b>Recommendation(s):</b>	Refuse permission			
<b>Application Type:</b>	Full Planning Permission			

<b>Conditions or Reasons for Refusal:</b>	<b>Refer to Draft Decision Notice</b>					
<b>Informatives:</b>						
<b>Consultations</b>						
<b>Adjoining Occupiers:</b>	No. notified	<b>0</b>	No. of responses	<b>27</b>	No. of objections	<b>27</b>
<b>Summary of consultation responses:</b>	<p>A site notice was erected at the site between the 29/08/2017 – 19/09/2017 and a press notice was advertised between the 31/08/2017 – 21/09/2017.</p> <p>27 objection letters were received with the following points of objection:</p> <ul style="list-style-type: none"> <li>• Design and visual impact: The proposed antennas would be huge and unsightly and would appear as additional storey. This would be out of keeping with the appearance and skyline of the building and would impact on the conservation area</li> <li>• Health Impact of the antennas: Proximity to schools and in a densely populated area. Multiple references to the governments 'Stuart Report'. Insufficient evaluation of impacts of the 4G Antennae. North Bridge School has raised direct concerns.</li> <li>• The Council would benefit financially from the development.</li> <li>• Number of antennas unreasonable, over concentration in the area which does not have a poor signal strength currently</li> </ul>					
<b>Primrose Hill CAAC</b>	<p><u>Objection</u></p> <p>"1. We are strongly opposed to the location of telecoms masts of the kind proposed in such close proximity to a large local school, North Bridge House: school buildings are less than 50m from the proposed installation. 2. The existing building is prominent in views within the conservation area – for example, from Gloucester Crescent and Oval Road. The proposed additions at roof level, located close to the front elevation, are bulky and obtrusive, and add to the over-dominance of the building within the area. The additions are seriously harmful to the character and appearance of the conservation area. They neither preserve nor enhance the character and appearance of the conservation area."</p>					

### Site Description

The application site is a five storey building located towards the southern end of Gloucester Avenue. Parkside Court provides 10 self-contained residential units. The property is not listed, but is located within the Primrose Hill Conservation Area, which is predominately residential.

## Relevant History

2011/4786/P - Installation of 2 communal satellite dishes, a new aerial with associated equipment cabinet and new external cable runs to the block of flats (Class C3)- Granted - 07/11/2011.

## Relevant policies

National Planning Policy Framework (2012)

London Plan (2016)

Camden Planning Guidance (CPG)

CPG1 Design (2015)

Primrose Hill Conservation Area Statement (2000)

Camden Local Plan (2017)

A1 Managing the impact of Development

D1 Design

D2 Heritage

## Assessment

### 1. The proposal

1.1 The application seeks permission for the installation of Installation of 6 antennas and 6 cabinets on roof located behind GRP screens, and 1 cabinet and associated works at ground level.

1.2 The proposed 6 antennas would be installed in pairs within two GRP shrouds on the South West and North East elevations of the main roof respectively. The GRP enclosures will enclose nearly the entire outline of the roof with a 2.4m gap separating the two screens on the North West and South East elevation respectively. These screens would stand at 2.6 m height (1.9 m above parapet level). The proposed GRP (fibreglass) shrouding would be painted with a brick effect to match the host building.

### 2. Principle of Development

2.1 The National Planning Policy Framework (NPPF) requires that applications for telecommunications development should be supported by the necessary evidence to justify the proposed development would not cause interference to other electrical equipment, air traffic services or instrumentation operated in the national interest, including details of pre-consultation with local schools and colleges, a statement that certifies that the development would not exceed the International Commission on non-ionising radiation protection (ICNIRP) guidelines, and evidence that the applicant has explored the possibility of erecting antennas on an existing mast. The NPPF also requires Local Planning Authorities to keep the numbers of radio and telecommunications masts 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, and, where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.

#### *Interference with existing Telecommunications Equipment*

2.2 The site is not located close to an aerodrome and the proposed equipment would operate on frequencies which are regulated by Ofcom which would ensure that there is no interference with nationally significant telecommunications or electronic infrastructure.

#### *Consultation with Local Schools*

2.3 UK Government Research in the Stewart Report (2000) advocated a precautionary approach to telecommunications development and identified that children are more susceptible to telecommunications radiation. The NPPF does not make reference to the precautionary approach directly, but does carry forward the principle of the consideration of the siting of masts close to local schools through the requirement for developers to pre-consult with local schools.

2.4 The developer undertook pre-consultation (letters) on the 17<sup>th</sup> of May 2017 with local schools including:

- North Bridge House Preparatory School, 1 Gloucester Road, London, NW1 7AB, located approximately 28m from the application site;
- The Cavendish School, 31 Inverness Street, London, NW1 7HB, located approximately 184m from the application site;
- Regents Park Nursery, 14-15 Gloucester Gate, London, NW1 4HG, located approximately 189m from the application site
- Saint Marks Square Nursery School, Regents Park, London, NW1 7TH, located approximately 303m from the application site

2.5 A response was received from the owners of North Bridge House Preparatory School objecting to the scheme. It is considered that adequate pre-consultation has been undertaken with schools.

2.6 The schools listed above are all within about 300m of the site. Considering the proximity, it would have been useful if the developer had submitted technical information to demonstrate that electromagnetic radiation would not be above safe limits for children within these nearby school sites, including details of the beam of greatest intensity (bearing, angle and strength of proposed signals). However, this was not provided. Nevertheless the plans show that the antennae are oriented north and south so that their signals will not pass over the nearest school grounds of North Bridge House Prep School which is further east.

#### *Impact on Health*

2.7 The NPPF states that Local Planning Authorities (LPA) should not determine health safeguards if the proposal meets International Commission guidelines for public exposure provided an ICNIRP certificate has been submitted.

2.8 The developer has submitted the necessary ICNIRP certificate as required by the NPPF.

2.9 A high number of objections have been received to the proposed telecommunications equipment on health grounds, some of which have cited academic and international research which concludes that antennas can be harmful. The NPPF does not give scope for the LPA to determine health safeguards beyond compliance with ICNIRP and that consultation should take place with schools in close proximity. The applicants' submissions give further advice on health issues which shows conclusively that, following research undertaken since the Stewart report, mobile phone base stations do not pose any health risks to people including children. A NRPB report dated Jan 2005 stated that there is no scientific basis for siting base stations away from schools. Later a research programme (MTHR) was undertaken in response to the Stewart report (2000) to address uncertainties on mobile phone base stations and health. Its report in Feb 2014 noted that research conducted found no evidence of biological or adverse health effects from radio waves produced by mobile phones or their base stations. Since 2000 over 30 studies have been undertaken which conclude that overall the possibility of adverse health effects from such technology remains unproven. An independent report in 2012 by AGNIR concluded that there is no convincing evidence that exposure to radiofrequency within the agreed guideline levels in UK causes health effects in adults and children.

#### *Use of Existing Masts/Site Sharing*

2.10 The NPPF requires consideration of siting the proposed equipment on existing masts in the area and requires the overall numbers of masts to be kept to a minimum required for efficient network

operation.

2.11 The developer has submitted existing and proposed telecommunications coverage maps which show an existing signal coverage deficiency in the area. These maps show the strength of the coverage from 'Indoor Suburban' (Where there is sufficient signal strength to provide adequate service for indoor use of a hand portable mobile in suburban areas) to 'indoor dense urban' (Where there is sufficient signal strength to provide adequate service for indoor use of a hand portable mobile in urban areas). It is therefore accepted that the development would improve the telecoms signal for mobile devices inside buildings in the area.

2.12 The developer's coverage maps identify existing masts in the wider Camden area on Albany Street, adjacent Mornington Crescent station and Camden Street. It is not known whether these are all of the masts in the area, or just those operated by the applicant. However, the developers' supporting information states that the equipment is required to cover the deficiency in the area. It is accepted that these existing sites are outside of the area; however, no technical justification has been given as to why the equipment at these sites cannot be upgraded to enhance the coverage over the required area. The developer has provided a list of 7 alternative sites in the NW1 area and stated why they were not suitable for the proposal. It is considered that alternative sites were explored.

### 3. Design and Conservation Impact

3.1 Policy D1 of Camden's Local Plan (2017) ensures that design require development to be of the highest standard of design that respects local context and character and policy D2 (Heritage) requires development to preserve or enhance the character and appearance of a conservation area.

3.3 The Primrose Conservation Area Statement identifies unsympathetic additions to roofs as a key issue in the conservation area and states that the rear of rear slopes are often as important as the front slopes as views are available from neighbouring streets and buildings. The Conservation Area Management Strategy further states that the conservation area retains its clear historic rooflines, which it is important to preserve. Additional storeys, fundamental changes to the roofline, insensitive alterations, poor materials, intrusive dormers or inappropriate windows can harm the historic character of the roofscape and should be resisted. Roof alterations or additions are likely to be unacceptable where a building forms part of a complete terrace or group of buildings which have a roof line that is largely unimpaired by alterations or extensions, or where its architectural style would be undermined by any addition. The rear roof is in some cases as important as the front where these are visible in views from other streets.

3.4 The proposed 6 antennas would be installed in pairs within two GRP shrouds on the South West and North East elevations of the main roof respectively. The GRP enclosures will enclose nearly the entire outline of the roof with a 2.4m gap separating the two screens on the North West and South East elevation respectively. These screens would stand at 2.6 m height (1.9 m above parapet level). The GRP (fibreglass) shrouding would be painted with a brick effect to match the host building.

3.5 The proposed antennae and screens would be sited in prominent positions at the South Eastern and North Western corners of the roof respectively. The screens would have a height and scale which would make them highly prominent and incongruous projections above the roof of the building in these positions at the edge of the roof. The proposed screens would give the appearance of additional storey to the building with its mass and bulk. The proposed structures would match the height of the existing tank room. As a group the structures would also clutter the roofscape of this building. The proposed structures would be visible from Gloucester Avenue, Prince Albert Road adjacent to Regent's Park and Regal Lane. It is noted that Parkside Court already stands higher than No.9 Gloucester Avenue at four storeys and matches the height of 3 Holyrood Court which also stands at five storeys high. It is considered that the proposal would give the appearance of an additional storey on top of the existing roof which would make it significantly taller than the other properties located along this section of Gloucester Avenue. It would be incongruous with the prevailing character of the street which is characterised by four and five storey dwellings.

3.6 It is considered that the proposed antennae and screens, by virtue of their design and siting, would cause harm to the character and appearance of the host building and also the wider area.

3.7 The public benefits of the development outlined above (i.e. improved coverage) would not outweigh the harm caused in accordance with the NPPF guidance. The application is therefore recommended for refusal on this basis.

#### 4. Amenity Issues

4.1 No objections were received on the grounds of loss of light and outlook. Given the nature of the development, it is not considered that the development would result in an amenity impact by reason of loss of light, outlook or noise to neighbours.

#### 5. Transport Issues

5.1 The development would only generate vehicle movements through initial construction and occasional maintenance, which would not result in any harmful highway impact.

#### 6. Conclusion

6.1. The proposed telecommunications antennas and GRP screening structures, by virtue of their inappropriate siting at the edges of the roof and their excessive height, scale and bulk, would result in a visually prominent and incongruous development which would harm the visual appearance and character of the building, streetscene and conservation area, contrary policies D1 and D2 of the Camden Local Plan (2017).