

<b>Delegated Report</b>		<b>Analysis sheet</b>	<b>Expiry Date:</b>	<b>05/02/2018</b>
		N/A / attached	<b>Consultation Expiry Date:</b>	<b>01/02/2018</b>
<b>Officer</b>			<b>Application Number(s)</b>	
Charlotte Meynell			2017/7095/P	
<b>Application Address</b>			<b>Drawing Numbers</b>	
Pavement outside 63 Loudoun Road London NW8 0DQ			Refer to 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 telecommunications equipment comprising of 1 x new 12.5m high monopole with 2 x antennas inside shroud and 2 x new associated equipment cabinets on the pavement.				
<b>Recommendation(s):</b>		Prior Approval Required – Approval Refused		
<b>Application Type:</b>		GPDO Prior Approval Determination		

<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>00</b>	No. of responses	<b>06</b>	No. of objections	<b>06</b>
<b>Summary of consultation responses:</b>	<p> <u>A site notice was displayed on 05/01/2018 and expired on 26/01/2018.</u>  <u>A press notice was advertised on 11/01/2018 and expired on 01/02/2018.</u> </p> <p>           In response to the proposal, objections were received from 69 and 73 Loudoun Road, 25 Artesian Road, 4e and 13b Rowley Way, 82K Rowley Way.         </p> <p>           Objections were made on the following grounds:         </p> <p> <u>Siting and Design</u> </p> <ul style="list-style-type: none"> <li>           I am currently occupier of a workshop at 69 Loudoun Rd and would be directly effected by the proposed tower. It is worth noting that the location chosen is directly outside a Grade II listed building of historical interest. This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest. Name: Loudoun Road housing, shops and craft workshops, comprising north block (61-83 Loudoun Road, 1-8 Langtry Walk) and south block (49-59 Loudoun Road, 2-62 Alexandra Place). List entry Number: 1428515. More about the listed status can be found here <a href="https://historicengland.org.uk/listing/the-list/list-entry/1428515">https://historicengland.org.uk/listing/the-list/list-entry/1428515</a> </li> <li>           This tower and the construction of it would detract from the overall appearance of the building. The height of the proposed tower at 12.5 metres is nearly twice as tall as the existing building. This would create an eyesore.         </li> <li>           This would be a health hazard as well as an eye-sore. 61-83 Loudoun Road has Grade 2 Listed Status and I strongly object to the proposed telecommunicaions tower.         </li> <li>           The proposed position of the mast and cabinets is detrimental to the listed status of the existing building at 61-83 Loudon Road, which is part of the (separately listed) Alexandra and Ainsworth Estate. Moreoever the TRA of the A&amp;A Estate has plans to refurbish this building including the possible creation of a new shopfront to Loudon Road. An alternative position for the mast and cabinets must be found that is detrimental to the setting of the existing building and does not compromise the plans for its future refurbishment.         </li> <li>           I object to this huge mast. There are plenty of other places to put this apart from outside the Tom Kay building. Now it is not going to be used by Hs2 this building is in line to be restored with a possible use of that Road front. Please do not put this mast in front of the building - it will ruin any future plans to the grade 2 star environment and it does not take much to move it along.         </li> <li>           I am writing to object to the erection of the telecommunication tower outside our workshop on Loudoun Road. The mast carries little reverence for our building's status and recognition as a Grade 2 listed building. It will simply be an eye sore, imposed on an area with a fair-bit of foot-traffic and urban appeal.         </li> </ul>					

- The scale, design and location of the mast are all detrimental to the Grade II listed status of the building.

### Health

- I am a tenant of 73 Loudoun Road and object strongly to this application. The buildings are Grade II listed and deserve to be treated with some respect. This will be both unsightly and as far as I am concerned I do not want to work near what I consider to be a health hazard. <https://www.safespaceprotection.com/emf-health-risks/emf-health-effects/cell-towers/.uk> say - I quote - The microwaves from cell phone towers can interfere with your body's own EMFs, causing a variety of potential health problems, including: Headaches. Memory loss. Cardiovascular stress. I therefore place this objection on record.
- This tower would pose a health risk to the occupants of this property and the surrounding areas. Cell phone towers emit high-frequency radio waves, or microwaves, that can travel as far as 45 miles over level terrain. The closer you are, the greater the danger. I also have concerns about access to the property during the construction as the proposed site is adjacent to the pedestrian entrance to the workshops. In short this is not an acceptable location for this project. The filing shows 8 options which have been discounted. This includes a rooftop antenna on Langtry Walk that was discounted due to the heritage status of the building. This application should be refused on the same grounds.
- The mast will be transmitting radiation. True, the jury is mixed on whether they transmit free-radicals at an unsafe level: I'm sure the community of Loudoun Road Workshops don't want to be proof of the pudding!

HS2 made the following comments:

- Firstly it is noted these works constitute permitted development not requiring planning permission, and therefore the formal Safeguarding Directions for the high speed railway are not effected. However, it is also noted that comments can be provided on aspects relating to the siting and external appearance of the works.
- In that regard please note the land in question is entirely within sub-surface and partially within surface safeguarding limits for the HS2 Alexandra Place ventilation shaft works. However, following the design review last Summer a decision was taken to remove the ventilation shaft site from the programme and although Powers remain in the HS2 Phase One Act, it has been decided not to use them to build the shaft. See following link for more information: <https://s3-eu-west-1.amazonaws.com/commonplace-customer-files/hs2ineuston/APVS+question+and+answers+15.06.17.pdf>.
- With reference to that information you can also see that there will still be HS2 construction related activity (including Ground Investigations (GI)) in the Alexandra Place area and the Construction team were approached to confirm if the proposed telecoms works on Loudoun Road would present HS2 Ltd or its appointed contractors any delivery issues.
- In response to that approach colleagues advise that whilst there are no specific concerns with the proposals and initial HS2 GI works in this area have been completed, further survey work by our contractors is scheduled for later this year and there could be a

potential overlap with respective works in that location. In the absence of a precise programme of works in the application submission it would therefore be helpful if the developer advised HS2 Ltd when they intend to carry out the works and also advisable for the developer and their contractor to follow ongoing progress of HS2 at: <https://www.gov.uk/government/organisations/high-speed-two-limited>.

Transport Strategy made the following comments:

- The telecommunications equipment would be located adjacent to an existing telephone kiosk at the back of the footway. The footway width is approximately 4.0 – 4.3 metres at this location. The proposal would have an insignificant impact on pedestrian comfort and movement and road safety. It is therefore deemed to be acceptable in transport terms. I therefore have no objection to the proposal being approved.

## Site Description

The application site comprises of an area of the footway adjacent to 63 Loudoun Road, on the western side of Loudoun Road. The site is directly adjacent to a telephone kiosk and the entrance to Nos. 61-83 Loudoun Road, and the entrance to a service yard to the rear of the building is located directly to the north of the site.

To the north lies the Overground railway line that runs between Watford Junction and Euston, and South Hampstead Overground Station is located directly to the north and accessed from the railway bridge on Loudoun Road.

The site is situated within the Alexandra Road Conservation Area, and is adjacent to a Grade II listed building comprising of housing, shops and craft workshops at Nos. 61-83 Loudoun Road, and Nos. 1-8 Langtry Walk. The Grade II\* listed buildings of the Alexandra Road Estate are located to the west and south-west of the site.

## Relevant History

### Site history:

None

### Neighbouring sites:

#### **Pavement on south side of Alexandra Road at corner with access road into Hilgrove Estate**

**2017/6163/P** – Installation of telecommunications equipment comprising a 15m high monopole with 2 antennas inside shroud and 2 dishes, plus 2 associated equipment cabinets on pavement. **Prior Approval application withdrawn 29/11/2017**

#### **Pavement north of railway cutting west of Gillies House, Hilgrove Road**

**2017/5572/P** – Installation of telecommunications equipment comprising a 15m high monopole with 2 antennas inside shroud and 2 dishes, plus 2 associated equipment cabinets on pavement. **Prior Approval given 15/11/2017**

#### **South Hampstead Station**

**2005/1985/P** – Installation of telecommunications equipment, including a 3m high lattice tower with one antenna, 2 equipment cabinets and ancillary fencing and equipment, behind existing timber fencing fronting Loudoun Road. **Prior Approval given 30/06/2005**

## Relevant policies

**National Planning Policy Framework (2012)**

**London Plan 2016**

**TfL's Pedestrian Comfort Guidance for London (2010)**

## **Camden Local Plan 2017**

A1 Managing the impact of development

C5 Safety and Security

C6 Access

D1 Design

D2 Heritage

G1 Delivery and location of growth

T1 Prioritising walking, cycling and public transport

## **Camden Planning Guidance**

CPG1 Design (2015)

CPG7 Transport (2011)

Alexandra Road Estate Conservation Area Statement (2000)

Camden Streetscape Design Manual

## **Assessment**

### **1.0 Proposal**

- 1.1 Confirmation is sought as to whether the installation of telecommunications equipment comprising of 1 x new 12.5m high replica telegraph pole with antennas inside a shroud and 2 x new associated equipment cabinets on the western pedestrian footway along Loudoun Road, adjacent to 63 Loudoun Road would require prior approval under Part 24 of Schedule 2 of the GPDO. The order permits the Council to only consider matters of siting and appearance in determining GPDO prior approval applications. As a result, it is not possible for objections to be raised on any other grounds, such as health.
- 1.2 The cabinets would be traffic black steel and would consist of 1 x side-by-side cabinet on 0.2m high steel plinths on root foundation measuring 1.2m wide, 4.8m deep and 0.7m high, and 1 x cabinet on root foundation measuring 0.6m wide, 0.5m deep and 1.5m high.
- 1.3 The monopole would be traffic black steel and would measure 12.5m high with a diameter of 0.3m, on a new D6 root foundation. 2 x 2-Port Kathrein antennas would be fitted to the top of the new monopole inside a shroud.

### **2.0 Justification**

- 2.1 The new monopole would provide enhanced coverage for EE Ltd and the Emergency Services Network (ESN) and would have the potential to provide coverage to H3G Ltd. The applicant has demonstrated, with the aid of plot coverage maps, the need for a new mast in order to provide ESN coverage into the tunnel mouth and railway line cutting to the east of the site.
- 2.2 As part of the site search stated in the supporting documentation, the applicants have approached various landowners nearby for placing equipment on existing buildings, but landowners have either refused or failed to respond. These include the block of flats opposite the site at 154 Loudoun Road and Oaklands House on the other side of the railway bridge to the north of the site. The applicants have also discounted two sites for the installation of a monopole on the pavement of the railway bridge to the north of the proposed site due to issues with the support of the root foundation; and several other sites on existing buildings due to being unable to achieve a line of sight into the railway tunnel, and due to the heritage status of the building (Langtry Walk).
- 2.3 The applicant has also declared that the equipment would comply with ICNIRP standards on emission levels. Thus, it is not anticipated that the proposed mast would have any direct impact on public health. There would be no impact on residential amenity in terms of loss of light or outlook.

### **3.0 Siting, Design and Appearance**

- 3.1 The application site is located on the back edge of the pedestrian pavement measuring on the western side of Loudoun Road. The footway in this location is approximately 3.4m wide, and once in place, the proposed telecoms equipment would leave an effective footway width of 2.6m. This is sufficient for pedestrians to pass unhindered, and is in excess of the 1.8m minimum unobstructed 'clear footway' width as required by Appendix B of TfL's Pedestrian Comfort Guidance and section 3.01 of Camden's Streetscape Design Manual. As such, the siting of the proposal would be considered acceptable in terms of transport impacts.
- 3.2 However, the proposed monopole and 2 x equipment cabinets would be located within the Alexandra Road Conservation Area and directly in front of the side elevation of the Grade II listed building comprising of housing, shops and craft workshops at Nos. 61-83 Loudoun Road, and Nos. 1-8 Langtry Walk, and so the impact of the proposals on the character and appearance of the conservation area and the setting of the listed building is a material planning consideration.
- 3.3 Policy D1 aims to ensure the highest design standards for developments. Policy D1 states that the Council will require all developments to be of the highest standard of design and to respect the character, setting, form and scale of neighbouring buildings, its contribution to the public realm, and its impact on wider views and vistas. Policy D2 states that within conservation areas, the Council will only grant permission for development that 'preserves and enhances' its established character and appearance, and that to preserve and enhance the borough's listed buildings, the Council will only grant permission for development that it considers would not harm the setting of a listed building.
- 3.4 Paragraph 132 of the National Planning Policy Framework (NPPF) says that heritage assets are an irreplaceable resource and 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, and any harm should require clear and convincing justification.
- 3.5 Viewed from the other side of the railway bridge to the north of the site, the Grade II listed buildings at Nos. 61-83 Loudoun Road, and Nos. 1-8 Langtry Walk, are read together as a group with the Grade II\* listed buildings of the Alexandra Road Estate to the west, which are of the same period. The junction with Rowley Way immediately to the south of the application site is also one of the main entrances to the Grade II listed Alexandra Road Estate.
- 3.6 Given the open character of the site adjacent to the railway line and within close proximity of the junction between Loudoun Road and Alexandra Road, the proposed 12.5m high monopole would appear very visible and dominant both up close. It would be prominent in the foreground of the listed buildings in the unobstructed views in the approach from the bridge and would be a discordant feature in the immediate background of the distinctive roofline of the Grade II listed building facing onto Alexandra Place. It is considered that the design and size of the proposed monopole would be unattractive and incongruous, as it would be over double the height and diameter of the surrounding slim line lampposts, and significantly taller than the neighbouring Grade II and Grade II\* listed buildings. The proposal would be an obtrusive piece of street furniture which would degrade the visual amenity of the area. Consequently, the proposed monopole would harm the character and appearance of the streetscene and Alexandra Road Conservation Area, as well as causing harm to the setting of the adjacent Grade II listed building, and group of Grade II\* listed buildings of the Alexandra Road Estate.
- 3.7 The 2 x proposed equipment cabinets would be located adjacent to the flank elevation of the external stairwell of the Grade II listed building comprising of Nos. 61-83 Loudoun Road, and Nos. 1-8 Langtry Walk. This is an important elevation as it showcases the full stepped design of the building and includes several attractive decorative features. This section of footway in front of the flank elevation is also relatively free of visual clutter with only an existing telephone kiosk next to the building, which was installed before the building became Grade II listed. The proposed equipment cabinets would be of a poor design in terms of size and scale, and would interfere with

the design of the side elevation when viewed from Loudoun Road. The proposed new equipment cabinets would therefore provide an intrusive addition to the street through the creation of further street clutter, which would be harmful to the setting of the adjacent Grade II listed building.

3.8 Considerable importance and weight have been attached to the harm arising to both the conservation area and the adjacent listed building, given the duty of the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended, and to give special regard to the desirability of preserving the adjacent listed building or its setting or any features of special architectural or historic interest which it possesses, under s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended. Whilst the submission documents note that the application site is located within a conservation area, they do not acknowledge the site's location adjacent to a listed building, and therefore no consideration has been given to the harm that the proposal would cause to the setting of the listed building. In terms of the NPPF, the harm to the conservation area and to the setting of the adjacent listed building would be less than substantial. That being the case, paragraph 134 advises that the harm should be weighed against the public benefits of the proposal, including securing optimal viable use.

3.9 NPPF guidance on telecommunications infrastructure states in paragraph 43 that '[local planning authorities] 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'. Furthermore, paragraph 45 of the NPPF states that '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, [to include]... 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.'

3.10 It is clear from this NPPF guidance that existing buildings and structures should always be considered first. The Council considers it is always a preferable option for antennae and masts to be placed on the roof of an existing building to minimise street and visual clutter and that a new ground-based mast should be treated as a last-resort option.

3.11 The technical need for a new mast to provide ESN coverage into the tunnel mouth and railway line cutting is not disputed and the benefits of sharing a site between EE Ltd and ESN are recognised. However, the need for the mast and the benefits that it would bring have to be balanced against the impact of the proposed monopole on the urban environment. In this case, it is considered that the damage to the conservation area and the setting of the adjacent listed building would be severe and would not be outweighed by the public benefits of the proposal.

#### **4.0 Conclusion**

4.1 The proposal by virtue of its design, height and location, would be overly dominant in the streetscene, creating visual clutter which would detract from the character and appearance of the streetscene and the Alexandra Road Conservation Area and would cause harm to the setting of the adjacent Grade II listed building.

#### **5.0 Recommendation**

6.1 Refuse Prior Approval