Delegated Report	Analysis sheet	Expiry Date:	29/01/2019
	N/A / attached	Consultation Expiry Date:	-

Officer	Application Number(s)
Charles Thuaire	2019/6381/P
Application Address	**Drawing Numbers**
Grangemill Ingestre Road London NW5 1XH	Please see decision notice

PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature

Proposal(s)

Installation of 12 pole mounted antennas (2 each on 6 poles), 6 cabinets, 4 dishes and 1 GPS antenna on the roof of block, plus 1 ground based meter cabinet outside block and associated works.

Recommendation(s):	**a) Prior Approval Required** **b) Approval Refused**
Application Type:	**GPDO Prior Approval Determination**
Conditions or Reasons for Refusal:	**Refer to Draft Decision Notice**
Informatives:	

Consultations						
Adjoining Occupiers:	No. notified	**00**	No. of responses No. Electronic	**00** **00**	No. of objections	**00**
Summary of consultation responses:	A site notice was commissioned on 11.1.19 but has not been displayed yet. <u>Objection from resident</u> of Durdans House, Royal College Street NW1- 'This sounds hideous and exactly the opposite of what Camden has been trying to achieve on its own properties! Is this really necessary?'					
Kentish Town Neighbourhood Development Forum (NDF)	<u>Kentish Town Neighbourhood Forum- no objection</u>- 'Telecommunication equipment can create significant issues and impact on the streetscape and the visual amenity of an area. We have been dealing with (and successfully opposing) two such cases located on 3 and 4 storey buildings in Kentish Town Rd. We are aware of the planning issues these installations can create. In this application, from a purely planning perspective, it seems to us that the potential negative impact on the visual amenity of the immediate area should be limited. The size and location of the equipment does not seem to be out of scale with the host building. Consequently we do not think it appropriate to register an objection on grounds of visual amenity in this case.'					

Site Description

1. The application site comprises a 8 storey high postwar block of flats within a large Council estate of low rise dwellings and an elderly persons home. The buildings and estate have no architectural or townscape merit. However one noticeable characteristic is that the estate blocks have very simple elevations and strong flat rooflines uncluttered by other plant or equipment. The block itself is brick clad with small windows. It comprises 2 interlocked flat roofed blocks, one lower than the other, plus a higher projecting central section; there is no visible additional rooftop equipment or antennae. To the north is a railway line, north of which is a private estate of 4 storey blocks of flats.

2. The site itself is not in a conservation area nor immediately adjoins one. It lies within the adopted Kentish Town Neighbourhood Plan area.

Relevant History

None

Relevant policies

National Planning Policy Framework 2018

The London Plan 2016

London Borough of Camden Local Plan 2017
Policy D1- design
Policy A1 - Managing the impact of development

Kentish Town Neighbourhood Plan 2016
Policy D3 - Design principles

Camden Planning Guidance
CPG1 Design- July 2015 (updated March 2018)

Assessment

1. Introduction

1.1 The proposal involves a new telecom equipment on the higher main flat roof of the tower block. It will comprise six 4.6m high poles on the roof edge, each holding a pair of antennas 2m high, totalling 12, all on the roof edge and facing north, west, east and south; in addition, there are 6 cabinets, 4 dishes and 1 GPS antenna set back on the roof. Also a meter cabinet will be on the ground adjoining the west side of the block. The poles and cabinets will be in standard grey colour. It is to provide equipment for Vodafone and Telefonica as part of a sharing agreement.

1.2 To clarify, the applicant is seeking prior approval for the siting and appearance of the equipment only. As a result it is not possible for objections to be raised on any other grounds, such as health. It is noted that, due to late validation of the application, the statutory 21 day consultation via a site notice has not formally started yet and will not finish until mid-February at the earliest, which is after the expiry of this application. However, a decision is needed to be made within 56 days of the application's receipt (4th December 2018). Thus if the applicant does not receive the Council's decision by 29th January 2019, the proposals will have deemed approval by default according to GPDO legislation.

2. Justification

2.1 The new mast will provide replacement and enhanced 3G and 4G coverage for both companies who have antennae on a building at 39-51 Highgate Road. However this site is being decommissioned and thus they need to find an alternative site. They both demonstrate, with the aid of plot coverage maps, the need for new antennae here, not only to replace the existing ones but also to provide better reception in the area further north of the railway line. Notably the coverage plots show that this residential area north of the railway line has only indoor suburban or in-car coverage, whereas the proposal results in improved indoor urban or dense urban coverage. In terms of 4G coverage, further north there is only outdoor or rural/in-car reception or even none at all which will be enhanced to urban/dense urban reception. The need for replacement telecom equipment here is therefore considered to be justified.

2.2 As part of the site search stated in the supporting documentation, the applicants have tested 10 other sites and buildings but are these considered unavailable, unsuitable for radio coverage or inappropriate as they are listed or the equipment would result in greater visual impact than the currently proposed one.

2.3 The applicant has also declared that the equipment will comply with ICNIRP standards on emission levels. The antennae are so high that they do not directly face any residential premises or habitable windows. Thus the mast is not anticipated to have any direct impact on public health. Furthermore, the mast is sufficiently far away from the estate to the north which is partly screened by trees and over 20m away, so as to not significantly add to a perception of risk to health. There will be no impact on residential amenity in terms of loss of light or outlook.

3. Siting and design

3.1 The siting of the proposed equipment is considered appropriate on the roof of a tower block; however the detailed position and design of the antennas as proposed here is considered inappropriate.

3.2 The cabinets are setback from the edge and are typical utilitarian grey metal box structures to be found on rooftops. They will be barely visible from the ground, thus it is considered that the proposed cabinets are not obtrusive in terms of their siting, size or design. No objections is raised to the ground level cabinet abutting the tower, which will be invisible in the streetscene.

3.3 The 12 antennas, 2 each on 6 poles, will be very visible as they are located on the outer edge of the higher tower element of this block- there will be 2 poles facing south, 1 facing east, one facing north, and 2 facing west. The number, height and location of these poles will make the equipment

very prominent. Firstly the sheer number of the antennas on poles results in a proliferation of visual clutter here. No justification has been given as to why so many antennas are required here, with not only 2 antenna on each pole as pairs facing the same direction but also several pairs of antennas facing almost the same direction. Secondly, the 4.6m height of the poles is excessive as the bases of antennas are over 2m above the rooftop. There is no reason why the antennas cannot be lower by 2m which would still allow an uninterrupted radio reception sightline, particularly as the tower is higher than all surrounding buildings so that there would be no intervening obstructions if the antenna were positioned lower. Thirdly, their location on the roof edge results in them being very prominent. In contrast, a setback position nearer the equipment cabinets would significantly reduce their prominence and would still allow uninterrupted radio sightlines, as the currently proposed 4.6m height of antennas would ensure that downward radio signals are not clipped by the roof parapet edge.

3.4 As noted in the site description above, the tower itself as well as the surrounding estate have no architectural or townscape merit, but they are characterised by strong flat rooflines uncluttered by other plant or equipment. It is considered that such a proliferation of very high poles with pairs of antennas located on the roof edge would result in excessive scattered visual clutter on this tower roof and would disrupt its clean roofline thus harming the character and appearance of the building and surrounding estate.

3.5 It is acknowledged that there is a justified need for replacement antennas in this area and no other suitable buildings have been found. It is accepted that this tower is not prominent in the wider public realm, being within a private estate and bordering a railway line and another private estate. It is also considered that this block could be ideal as it is in the right place and of the right height to accommodate antennae and provide the necessary area of radio coverage. However insufficient thought and inventiveness has been applied to designing this proposal in such a way that could reduce the equipment's prominence. It is suggested that fewer antennas and poles of a lower height and significantly set back from the roof edge would be preferable which would reduce the overall impact on the tower. Alternatively perhaps, one tower mast, hosting all the required antennas to maintain a 360 degree coverage, could be placed centrally on the highest roof element of the block which would create a central visual design feature whilst maintaining the flat rooflines of the surrounding lower elements here. However, given the tight determination timescales of this application, there is no time for further negotiation on this proposal.

3.6 In conclusion, in the absence of sufficient justification of the current proposal's design, it is considered that the antennas and poles, by virtue of their excessive number and height and their prominent siting, would result in a proliferation of harmful visual clutter which would be unattractive and over-dominant on the building and in the wider townscape.

4. Recommendation

4.1 Prior Approval Required – Approval refused on grounds of unacceptable siting and design.