

Delegated Report		Analysis sheet		Expiry Date:		27/09/2017	
		N/A / attached		Consultation Expiry Date:		31/08/2017	
Officer				Application Number(s)			
Charles Thuaire				2017/1344/P			
Application Address				Drawing Numbers			
36 Millman Street London WC1N 3EQ				See decision notice			
PO 3/4		Area Team Signature		C&UD		Authorised Officer Signature	
Proposal(s)							
Installation of telecommunications equipment on rooftop, including 9 antennas and 3 x 300mm diameter dish antennas behind 2 glass fibre-reinforced plastic (GRP) screen enclosures on top of water tank rooms and 5 equipment cabinets on top of the communal stairwell, plus ancillary works.							
Recommendation(s):		Grant planning permission					
Application Type:		Full Planning Permission					
Conditions or Reasons for Refusal:		Refer to Draft Decision Notice					
Informatives:							
Consultations							
Adjoining Occupiers:		No. notified	00	No. of responses	00	No. of objections	00
Summary of consultation responses:		Site notice displayed 9.8.17 to 30.8.17 Press advert published 10.8.17 to 31.8.17 No responses					
CAAC/Local groups* comments: *Please Specify		<u>Bloomsbury CAAC</u> – no response received					

Site Description

1. The site has a postwar 5 storey block of flats in brick/render with a centrally located recessed communal entrance in render on Millman Street. This entrance is set back both from the roof and front façade; however it also has a rearward projection with 2 tall towers containing water tanks and plant rooms that rise higher than the adjoining flat roofs of the main blocks. These 2 towers are very prominent as viewed from the rear from Doughty Mews and Roger Street. The latter road is so aligned that views down the street directly face these towers. The block is Council-owned.

2. The site is in Bloomsbury conservation area sub-area 10 but is not identified as being positive or negative to its character.

3. The Conservation Area Appraisal and Management Strategy (CAAMS) describes the character of Millman St in sub-area 10 in these 2 paragraphs:

5.177- There is some architectural variety along Millman Street, which comprises later 20th century housing as well as late 19th century terraces forming part of the Rugby Estate.

5.185- Whilst the urban grain and scale of the east side is consistent with the character of the street and the wider sub area, there is little of historic interest other than Nos 60-62 (even), two surviving late-Georgian townhouses built in yellow stock brick. Housing for the London Borough of Camden built in 1974 to the designs of Farrell and Grimshaw Architects lines much of the eastern side: the predominant facing material is a hard, stack-bonded red brick at upper floor level, with render at street level, lightwells with railings and a recessed fourth floor easing the skyline.

4. Guidance relevant to this case is given in these paragraphs-

5.26- It is clear from the Conservation Area Appraisal that there is considerable pressure for redevelopment and new development across Bloomsbury. This pressure comes from a number of sources of different scales: (*inter alia*)

ii) a range of small scale changes that can, cumulatively, have a significant impact on the character of an area (e.g. roof extensions; rear extensions, satellite dishes and aerials, fire escapes, plant)...

5.28- Development proposals must preserve or enhance the character or appearance of the Bloomsbury Conservation Area.

5.38- Fundamental changes to the roofline, insensitive alterations, poor materials, intrusive dormers, or inappropriate windows can harm the historic character of the roofscape and will not be acceptable.

5.41- Prominent external telecommunications apparatus, including cable runs, can harm the appearance of an historic building. Efforts should be made to find discreet solutions appropriate to the character of the area.

Relevant History

None

Relevant policies

National Planning Policy Framework 2019

London Plan 2016

Camden Local Plan 2017

A1 Managing the impact of development

D1 Design

D2 Heritage

Camden Planning Guidance

CPG Design 2019

CPG Amenity 2018

Assessment

1. Proposal

1.1 The proposal is for new telecom equipment on the flat roof and towers, comprising the following- 4 antennas and 1 dish mounted on poles on the northern water tank room; 5 antennas and 2 dishes also on poles on the southern water tank room. These antennas and dishes will be contained within 2 x 2.1 metre high GRP enclosures, colour coded to match the external appearance of the water tank rooms. Also there are 5 equipment cabinets approx. 2m high on the main roof at the top of the communal stairwell behind two existing flues, plus a small electricity meter cabinet at ground level next to the front entrance doors.

2. Background

2.1 The equipment is to improve 2G, 3G and 4G coverage. The equipment is a site-sharing exercise between Telefonica and Vodafone. Coverage plots have been provided which show that, for Telefonica, the area immediately to the north and west of the site and, for Vodafone, the area to the north of Guilford St both have relatively poor phone reception compared to the adjoining areas- currently these areas only have 'indoor suburban' or 'indoor urban' phone reception compared to surrounding 'indoor dense urban'. The new equipment will enable provision of 'dense urban' coverage in line with the adjacent areas. Thus it is clear that the proposed installation will fill a small coverage gap in this area of Camden.

2.2 According to the applicant's supporting statement, consultation emails were sent to 3 local councillors and MP, 2 local schools and 2 nurseries plus a site notice was displayed. No response was received to this consultation exercise. 6 alternative sites (Elm House, Clerkenwell; 200, 222, 256 and Trinity Court Grays Inn Rd; 26 Mecklenburgh Square) were investigated in the locality and landowners approached but no responses were received or, in 2 cases, they were unwilling to allow telecom equipment on their buildings. An ICNIRP certificate has been provided (see para 4.2 below for more information on this).

2.3 NPPF guidance in para 45 states that- *Applications for telecommunications development... should be supported by the necessary evidence to justify the proposed development. This should include-*

- *the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college;*
- *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 and a statement that self-certifies that, when operational, International Commission guidelines will be met.*

2.4 It is clear that public consultation and alternative site searches have been undertaken in accordance with legislation and guidance. Adequate justification has been provided as to why this building is the only one available and suitable and why new phone antennas are required to improve deficient radio coverage in the area.

3. Design

3.1 The new antennas and dishes will be hidden behind 2 new GRP enclosures above the 2 projecting towers in an attempt to reduce the visual impact of telecom clutter on the rooftop. Thus the equipment in itself will not appear as individual elements creating visual clutter above the roofline, which is welcomed. The agents have submitted photomontages to show how the new enclosures will appear in various views from the west, south and east of the site. The new enclosures are unlikely to be visible at all from Millman Street, both in short and long views, due to the considerable setback of the 2 towers from the street and will thus have no harmful impact on the appearance of the building and character of the streetscene. The montages show that views from the front in Millman St, the

north in Guilford St and the south in Rugby St will be unaffected. A montage of a view from a gap between buildings in Northington St to the south shows that the new enclosures will be visible on top of the towers. However this is a glimpse view that is only experienced for a short moment and shows the towers at a considerable distance so that the new enclosure does not appear very obvious or prominent.

3.2 However the three other montages taken from the east show the enclosures to be very prominent- from John's Mews over the open school yards behind the block of flats, looking west directly down Roger Street, and south from Doughty Mews over the rooftops of the mews houses. These views are particularly harmful and problematic. It is acknowledged that the GRP enclosure has been introduced to eliminate the problem of visual clutter created by antennas and dishes on poles projecting above a roofline. However the enclosure introduces harm in itself. Although a GRP enclosure in itself can in principle be acceptable in some circumstances, officers remain unconvinced that the GRP material can exactly replicate the rendered facades beneath in colour and texture, that it may fade over time, and that the enclosure overall will not appear as naturally projecting element of the existing towers.

3.3 The existing towers are very prominent in certain views as highlighted above and appear as rather incongruous features in the townscape at the rear which is characterised by a number of buildings that are listed or positive contributors to the conservation area. They form a very prominent feature in the view down Roger Street at its junction with Doughty St (where they are listed buildings), above both traditional and contemporary buildings; they are visible over the roofs of 'positive contributor' mews houses at points within the narrow Doughty Mews; they dominate the low rise landscape around the school as viewed from John's Mews.

3.4 The additional 2m height created by the enclosures, even if the materials were exactly matching, would make these towers even higher and more prominent. The additional bulk and height would harm the appearance of the host building- it currently has a very low key presence in the townscape from the rear, apart from its 2 rear ancillary towers, and the extended larger towers would dominate the building and no longer be seen as subordinate elements. The additional height would also increase the visual prominence of what is a currently poor and unwelcome feature in many townscape views. In particular, as demonstrated by the photomontages, these extended twin towers would totally dominate the view from Roger St and its junction with Doughty St; they also would loom over the rooftops of Doughty Mews which has a traditional and relatively unaltered streetscape of 2 storey brick houses and workshops.

3.5 The applicant was invited to explore the possibility of installing antennas discreetly against elevations of the towers, rather than on top as currently proposed, so that the antennas were camouflaged against the tower and there would be no need to have the prominent enclosures. However they advised this was not acceptable in technical terms as the current design was the only option that would allow sufficient coverage provision for both operators from this location.

3.6 It is thus considered that 2 GRP enclosures would create bulky, prominent and incongruous features on the building and in the townscape and would worsen the impact of the existing towers which are already a dominant element of the host building and an unwelcome feature in the townscape. Accordingly they will harm the character and appearance of the several surrounding streetscapes and parts of Bloomsbury conservation area as viewed from the rear. They will create an intrusive feature harming the character of the roofscape, contrary to design guidance for this conservation area within the Bloomsbury CAAMS, as referred to in the site description section above.

3.7 The proposed equipment cabinets are placed on the flat roof of the central communal entrance and coloured grey to blend in with the sky; they are set back by about 5m from the front elevation and, despite being 2m high, due to the lower roof here, will be no higher than the adjacent rooflines of the two flanking 5 storey wings. They will be marginally visible from the street directly opposite the entrance but will be behind the existing flue pipes and other rooftop plant here. In long views they will be masked by the adjoining 5 storey wings. Overall they will be barely visible if at all from Millman Street and will have no harmful impact on the building's appearance. The ground cabinet will be against the recessed front/side wall and again, due to its location and size, is a discreet feature that

will have no visual impact.

3.8 Para 196 of the NPPF on the historic environment states that '*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, where appropriate, securing its optimum viable use*'. Local Plan policy D2 repeats this by stating that the Council will 'not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm'. It also states the Council will 'require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area'.

3.9 In this case it is considered that the enlarged tower enclosures cause 'less than substantial' harm to the character and appearance of parts of the Bloomsbury conservation area that lie to the east of the site. It is also considered that, despite the aims of the scheme to improve radio reception in some parts of the surrounding area, these public benefits are nevertheless limited and insufficient to outweigh this harm as part of the balancing exercise recommended by NPPF guidance.

3.10 Special attention has been paid 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 by the Enterprise and Regulatory Reform Act 2013.

3.11 NPPF guidance in para 43 states- *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.*

3.12 CPG on Digital Infrastructure, which covers telecom equipment, states in paras 12 and 13- *In line with the NPPF, the Council will support the expansion of electronic communications networks, including telecommunications and high speed broadband. In particular, the Council will 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 demonstrated to the satisfaction of the Council. Where new sites are required, equipment should be sympathetically designed and appropriately camouflaged where possible.*

3.13 It is considered that this proposal complies with this guidance in respect of using existing buildings. However the proposal to camouflage the equipment in order to mask visual clutter, as promoted by this guidance, actually results in more bulky rooftop projections that are considered harmful to the building and locality.

4. Amenity

4.1 Para 45 of the NPPF states that applications for telecommunications development should be supported by the necessary evidence to justify the proposed development. This should include a statement that self-certifies that, when operational, International Commission guidelines (on non-ionizing radiation protection) will be met.

4.2 Para 46 states that *local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure.*

4.3 The application submitted an ICNIRP Declaration which certifies that the equipment is designed to be fully compliant with the precautionary guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). This is an independent body of scientific experts established by the International Radiation Protection Association. The guidelines were developed following a thorough review of the science and took into consideration both thermal and non-thermal effects. The guidelines are made up of two parts: the first is based on established and proven science; the second

part incorporates a safety factor meaning that the guidelines come with a built-in precautionary element.

4.4 No comments or objections have been received to the proposed telecommunications equipment raising health issues. However as noted above, the NPPF does not give scope for the local planning authority to determine health safeguards beyond compliance with ICNIRP and that consultation should take place with schools in close proximity. It is therefore considered that there is no clear evidence available to justify refusing the scheme on health grounds arising from actual or perceived harm from mobile phone antenna radio waves.

4.5 There will be no impact from the various structures and units on daylight, sunlight, privacy or outlook to neighbouring premises. It is thus concluded that there will be no adverse impact on residential amenity or public safety of adjoining residential occupiers.

5. Recommendation

Refuse planning permission for following reason-

The 2 proposed GRP enclosures, by reason of their location, bulk, height and design, would create large prominent and incongruous features in conjunction with the existing towers and will thus harm the character and appearance of the host building, the surrounding townscape and parts of Bloomsbury conservation area as viewed from the east of the site, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.