

Application No:	Consultees Name:	Received:	Comment:	Response:
2019/4385/P	Steven Parnes	04/11/2019 10:13:38	OBJ	<p>DARWIN COURT 66- 89 DARWIN COURT GLOUCESTER AVENUE LONDON CAMDEN NW1 7BQ</p> <p>OBJECTION TO PROPOSED INSTALLATION OF TELECOMMUNICATION EQUIPMENT AT ROOF LEVEL (REF: 2019/4385/P)</p> <p>We write in respect of the above planning application which has been submitted at Darwin Court (the "Site"), located on Gloucester Avenue, close to Camden Town.</p> <p>It is understood that Telefonica UK Limited have entered into an agreement with Vodafone Limited pursuant to which the two companies plan to jointly operate and manage a single network grid across the UK.</p> <p>The purpose of the proposals is to enable new and improved 2G, 3G, 4G and 5G services for Telefonica and Vodafone networks.</p> <p>To achieve such coverage 12 antennas are required; 4 to be installed on the north section of the roof, 4 on the south east section of the roof and 4 to be installed in the west section of the roof. The 5 cabinet structures to be installed with the following dimensions:</p> <ul style="list-style-type: none"><li>• 1 x cabinet: 820mm (w) x 700mm (d) x 1800mm (h);</li><li>• 2 x cabinets: 750mm (w) x 600mm (d) x 21000 (h); and</li><li>• 2 x cabinets: 800mm (w) x 660mm (d) x 1770 (h).</li></ul> <p>Given the residential context and the location close to heritage assets, it is considered that the proposals could cause harm to the visual amenity of the area.</p> <p>The key concern is the effect that the proposal would have on Darwin Court and on the wider Conservation Area as a whole. The views of the equipment from Gloucester Avenue and Regents Park Road would be dominant. The provision of this equipment at roof level is considered to create visual clutter and detract from the setting and appearance of the Conservation Area. This is considered contrary to Policies D1 and D2 of the London Borough of Camden Local Plan 2017.</p> <p>Whilst it is noted that the applicant has submitted an ICNIRP (International Commission for Non-ionising Radiation Protection) compliance certificate, no plans indicating the extent of ICNIRP exclusion zones have been submitted with the drawings. Equally, the drawings refer to the standard TEF and Vodafone ICNIRP guidelines SDN0008, however, the document is not provided for proper consideration. As the non-ionising radiation could affect the subject building as well as adjacent buildings and their occupants, the applicant's drawings should show such exclusion zones in plan and elevation form, to ensure that they are not detrimental to public health.</p> <p>You should also be aware that the NPPF places a duty on the Applicant to engage with organisations who have an interest in the proposal. This would be the case for us as Landlords, but we have not been consulted.</p> <p>It is for this reason that we object to the proposals, and ask for this Letter to be carefully considered by Officers in their review of the submitted material.</p>

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Yours faithfully

Steven Parnes  
Central and Metropolitan Estates Retirement Benefits Scheme

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