Delegated Report		Analysis sh		Expiry Date:			
(Refusal)		N/A / attache	ed	Cons. Expire:	16/03/1	q	
, , , , , , , , , , , , , , , , , , ,					10/00/1	5	
Officer			Application Nur	nber(s)			
Jaspreet Chana			2018/6382/P				
Application Address			Drawing Numbe	ers			
CENTENARY HOUSE 96-98 CAMDEN HIGH STREET							
LONDON			See draft decisio	See draft decision			
NW1 7JYPO 3/4Area Team SignatureC&UD			Authorical Of				
PO 3/4 Area Tear	n Signature	Caud	Authorised Of	licer Signature			
Proposal(s)							
Removal of existing stub-monopole and 3 no. antennas, installation of a steel-frame supporting 12 no. antennas and 3 no. dishes screened by proposed GRP shroud, retention of 1 no. existing dish, removal of 2 no. existing cabinets and replacement with 10 no. proposed equipment cabinets and associated works							
Recommendation(s):	Refuse						
Application Type:	Full planning permission						
Conditions or Reasons for Refusal:	Refer to Draft Decision Notice						
Reasons for Conditions:	Refer to Draft Decision Notice						
Informatives:	Refer to Draft Decision Notice						
Consultations							
Adjoining Occupiers:	No. notified	0	No. of responses	0 No. of o	bjections	0	
Summary of consultations:	One site notice was displayed to the front of No.98 Camden High Street and outside 16-17 Pratt Street on 20/02/19 (consultation end date 16/03/19). The development was also advertised in the local press on the 21/02/2019 (consultation end date 16/03/2019).						
Summary of consultation responses:	No objections were received.						
Camden Town CAAC:	 An objection was received from the CAAC stating the following: We object to the introduction of such larger and unsightly use of equipment on this or any other buildings in the conservation area. Site lines for signals need careful consideration. A coordinated approach is needed across the conservation area. More suitable sites that could provide signals for a wide area should be identified, prior to giving any permissions for new sets of antennas for enhanced communication technology. Officer response: Please see section below 3 below. 						

Site Description

The application site is 4 storey building located to the south east of the junction of Pratt Street and Camden High Street. The building consists of commercial/retail land uses on the ground floor with the rest of the building in office use. The surrounding area is mix of commercial, retail and residential sites. The building is located within the Camden Town Conservation Area.

The building is located in the Camden Town town centre. The building's roof top is currently accommodated by 3 no. antennas mounted on a stub-monopole and 2 no. equipment cabinets.

Relevant History

2012/4523/P - Replacement of existing telecommunications roof top flagpole with new flagpole antenna, and replacement of roof level equipment cabinet as well as installation of other ancillary telecommunications equipment – Granted - 21/01/2013.

Relevant policies

National Planning Policy Framework (2019) – Chapter 10 Supporting high quality communications

The London Plan (2016)

Camden Local Plan (2017)

- D1 Design
- D2 Heritage
- A1 Managing the impact of development

Camden Planning Guidance:

- CPG Design (March 2019)
- CPG Amenity (March 2018)
- CPG Digital Infrastructure (March 2018)

Camden Town Conservation Area Appraisal and Management Strategy 2007

Assessment

- 1. Proposed development
- 1.1 Planning permission is sought to upgrade the existing telecommunications equipment at roof level to facilitate 5G in the area. The proposal involves:
 - Removal of existing stub-monopole; and
 - Removal of 3 no. antennas;
 - Installation of a steel-frame supporting 12 no. antennas and 3 no. dishes screened by proposed GRP shroud;
 - Retention of 1 no. existing dish, removal of 2 no. existing cabinets and replacement with 10 no. proposed equipment cabinets and associated works.
 - The site is required to provide enhanced coverage for EE (UK) Ltd and Three (UK) Ltd.'s customers.

2. Assessment

2.1 The principle considerations in the determination of this application are:

- Design Impact on the character and appearance of the host building, street scene, and nearby conservation area; and
- Amenity Impact on neighbouring amenity

3. Design

3.1 Policy D1 of the Camden Local Plan seeks to secure high quality design in development; specifically requiring development to respect local context and character; preserve or enhance the historic environment and heritage assets in accordance with Policy D2; and preserve strategic and local views. Policy D2 states that the council will seek to protect heritage assets and non-designated heritage assets, including those on the

local list. The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

- 3.2 Policies D1 and D2 are supported by the Councils Design CPG and Digital Infrastructure CPG.
- 3.3 The NPPF requires Local Planning Authorities to keep the number of radio and electronic communications masts, and the sites for such installations to a minimum, consistent with the needs of consumers, the efficient operation of the network and to provide reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflages where appropriate.
- 3.4 The applicant's supplementary information document states that the proposals seek to upgrade an existing roof top site rather than progress a new standalone facility. It is also argued that the design of the proposed equipment is considered to be the least visually intrusive option available given the increased antenna sizes required for 5G, and that the increased size would not detract from the character of the area in which the proposal sits.
- 3.5 The subject building is four storeys in height and has an existing plant room (2.8m in height and 4.1m wide) on the roof with an antenna pole (5.4m in height) and MBNL (Mobile Broadband Network Limited) duo outdoor flat pack rack equipment.
- 3.6 The proposal would see the existing 3 antennas, stub-monopole and their associated steel-work removed. A steel frame would be installed on the plant room's roof. The proposed 12 no. antennas would be mounted on the new frame through support steel work. The antennas are proposed to be similar in size to the existing, but are slightly different in size due to the requirement for higher technical performance, for accommodating upcoming new technology. The proposed steel frame and antennas would be screened by approximately 4.63m high GRP shroud. The GRP shroud would be painted to match the colour of the existing plant room which is white. The proposed steel work frame with the antennas would measure 4.6m in height, 4.1m in depth and 5m wide, this would be placed on top of the existing plant room, so the total height of this new structure would be 7.4m in height 4.1m depth and 5m wide.
- 3.7 The additional equipment like the RRUs (Remote Radio Units) would be fixed to the plant room's wall and would be painted to match the plant room. The 2 existing equipment cabinets would be removed and replaced by 10 cabinets which would be mounted on new steel grillage as well as incorporating a new handrail. These would be set back from the front of the building and set on the main roof at a lower height that the existing plant room and therefore would have limited visual impact.
- 3.8 However, the new steel apparatus structure would be over double the height of the existing plant room and would be 2m higher than the existing antenna pole. The existing white plant room is already a feature which is directly visible within the street scene with views across Camden High Street (from both sides), directly adjacent to Pratt Street and views from up and down Pratt Street. The addition of the proposed apparatus on top of the plant room would be highly visible within the street scene from Delancy Street, Camden High Street and Pratt Street. With a total height of 7.4m tall (inclusive of plant room), it would be over half the height of the existing 13m tall building. The apparatus would appear unsightly and dominant within the street scene and due to its sitting on top of the existing plant room would maximise its prominence on the building.
- 3.9 The NPPF states that where the new sites are required (such as for new 5G networks) equipment should be sympathetically designed and camouflaged where appropriate. In this instance the proposed development has not been sensitively designed, but is considered to be excessively large, bulky, incongruous development which would cause harm to the appearance of the existing building and would cause harm to the character and appearance of the Camden Town Conservation Area.
- 3.10 The development would result in harm and although there would be some public benefits (from the enhanced network coverage) this would be modest and would not outweigh the impact on the character and appearance of the building or nearby conservation areas.
- 3.11 During the course of the application officers did seek further information from applicants as to why this particular site was considered and why other more appropriate sites were not considered for this proposal. The agents reverted that other sites were unsuitable hosts due to radio signal being corrupted, however officers consider there are still other sites within the proximity of the site that could have been considered

better hosts for this proposal. No evidence or further justification was provided by the applicants as to why other sites were not explored.

3.12 Overall, considering the visual prominence of the development and the context of the site within Camden Town Conservation Area near listed buildings to the east of the site (Nos.4 - 16 Pratt Street), it is considered that the proposed apparatus with antennas, by virtue of their inappropriate siting, scale, height and bulk, would result in a highly visually prominent, visually cluttering and incongruous development which would harm the visual appearance and character of the street scene, and would fail to preserve or enhance the character and appearance of the host building or the Camden Conservation Area, contrary to policies D1 and D2 of the Camden Local Plan 2017 and the London Plan and the NPPF.

4. Amenity

- 4.1 Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered.
- 4.2 The subject building is taller than those buildings to the north, east and west, and similar heights as those on the south, so the proposed plant would not cause a loss of outlook or daylight to adjoining occupiers.
- 4.3 The NPPF requires applications for telecommunications development to be supported by the necessary evidence to justify the proposed development. This should include:
 - a. The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where the mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and
 - b. For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or
 - c. 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.
- 4.4 The applicant has provided supplementary information however no confirmation or information has been provided whether there are any schools in close proximity to the site, therefore no consultations were undertaken; the site is not located within 3km of an aerodrome or airfield and as such the Civil Aviation and Secretary of State have not been notified. A declaration of conformity with ICNIRP Public Exposure Guidelines has also been submitted.

5. Conclusion

5.1 The proposed antennas, steel frame grid and associated equipment at roof level, by virtue of their siting, size and design, would result in a visually prominent and incongruous rooftop development which would harm the appearance and character of the host and adjacent buildings, local views, street scene and adjacent Camden Town Conservation Area, contrary to policies D1 and D2 of the Camden Local Plan 2017.