

For the attention of Matthew Dempsey

Dear Sir,

ACADEMIC HOUSE, 24-28 OVAL ROAD, LONDON, NW1 7DT

OBJECTION TO PROPOSED INSTALLATION OF TELECOMMUNICATION EQUIPMENT AT ROOF LEVEL (REF: 2019/4014/P AND 2019/4502/L)

We write in respect of the above planning and listed building applications which have been submitted at Academic House (the "Site"), located on Oval Road, close to Camden Town and adjacent to Regents Canal.

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.

The purpose of the proposals is to enable new 5G coverage and to improve 2G, 3G and 4G services for the Telefonica and Vodafone networks in the immediate area.

To achieve such coverage 4 new sector antennae are required together with one dish antennae for network backhaul. All are to be installed on the highest section of roof above the junction of Oval Road and Jamestown Road. The top of the existing lift motor room and the highest point of the building is 25.3m above ground level and the antennae will extend to 27.5m. This is 2.2m above the current maximum height of the building. Three of the five antennae to be deployed, comprising two of the sector antennae and one dish antenna, are to be fixed to the plant room wall will not be screened. As the plant room can currently be seen from the approach along Oval Road the new antennae will be clearly visible, creating a visual intrusion on the skyline.

It is also noted that the drawings depict two dish antennae, despite the application being submitted for just one dish antenna, which could invalidate the application.

The two remaining sector antennae and 6 cabinet structures are to be installed behind GRP shrouding. The GRP shrouding will be up to 24.7m above ground level, some 3.1m higher than the current roof level.

Comparing this application with the planning permission granted under reference 2016/3257/L it is noted that the antennae in the 2016 application did not extend higher than the existing plant room, the GRP shrouding and cabinets were set further back from the leading edge of the roof to Oval Road and the GRP shrouding was planned to be 2m high whereas in these applications the shrouding is proposed at 3.1m above roof level. These are significant differences increasing the bulk and visual impact of the installation.

It is also noted that the decision notice for planning application 2016/5142/P, involving the siting of plant on the roof, stated: "The plant has been situated to avoid any impact on the visible elevations of historic lightwells, and to minimise its visibility in views from surrounding Conservation Areas and from within the setting of nearby listed buildings; such that there will be no additional visual impact from ground level. The proposed rooftop plant has been substantially reduced in scale and specification through negotiation on the application". The proposed installation does not comply with the same requirements demanded of the rooftop plant.

Academic House is a Grade II Listed Building (Listing Entry 1113236). The site also falls within

the Regents Canal Conservation Area.

Given the listed status of the building and its location close to heritage assets, it is considered that the proposals not only fail to preserve or enhance the conservation area but could cause harm to the visual amenity of the area and to the building itself.

The key concern is the effect that the proposal would have on Academic House and on the wider Conservation Area as a whole. The views of the equipment from Oval Road would be dominant. The nearest existing base station at 12 Oval Road is set much further back from Oval Road. Sharing the existing rooftop stub-mast installation at 12 Oval Road would have far less impact on the conservation area and vistas along Oval Road.

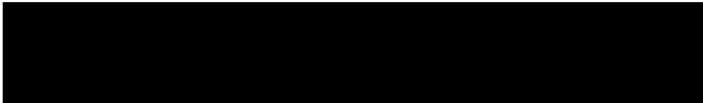
The provision of this equipment at roof level is considered to create visual clutter and detract from the setting and appearance of the Conservation Area and from surrounding Listed Buildings. This is considered contrary to Policies D1 and D2 of the London Borough of Camden Local Plan 2017. It is also detrimental to Academic House, a Grade II Listed Building.

It is noted that the applicant has not submitted an ICNIRP (International Commission for Non-ionising Radiation Protection) compliance certificate and has omitted any drawings indicating the extent of ICNIRP exclusion zones. Equally, the drawings refer to the standard TEF and Vodafone ICNIRP guidelines SDN0008, however, the document is not provided for proper consideration. The ICNIRP compliance declaration within their supporting statement could be considered incorrect as ICNIRP define the public as anyone not having relevant radio frequency training. Other contractors working for the building owner do have access to the roof and should not enter public exclusion zones. The application could be considered invalid for failing to provide this information.

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 the Tenant occupiers of the building, but none have been consulted.

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.

Yours Faithfully

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