

**From:** Dempsey, Matthew Matthew.Dempsey@Camden.gov.uk   
**Subject:** RE: Telecoms - pre-app advice x 3 sites \*\*URGENT\*\*  
**Date:** 4 February 2020 at 20:04  
**To:** Dianne Perry tweeddevelopmentplanning@gmail.com

MD

Dear Dianne,

Please find the pre-app advice below, I have compiled general advice for all sites, and then given constraints and site specific advice for each site relating to pre-app 1 and 2. I will follow this up with site specific advice for pre-app 3 tomorrow morning.

Once you have reviewed the information, please get in touch with any queries? As discussed, I will be happy to meet you and go over this in more detail as necessary?

### **Pre-planning advice:**

Please find below our general pre-app advice which may be considered to apply to all sites for which you have requested advice, and further detailed information relating to each specific site. These have been split into 3 pre-apps due to fees paid, but with a separate pre-app reference for each site, listed immediately below as follows:

- Pre-app 1: Monmouth House (2020/0545/PRE) and Grangemill (2019/5400/PRE).
- Pre-app 2: 1 St Giles High St (2019/5697/PRE), Albion House (2020/0552/PRE) & Prospect House (2020/0551/PRE).
- Pre-app 3: Englefield (2019/5706/PRE) and Weech Hall (2020/0556/PRE).

## **General Advice, re: Telecoms Installations:**

I have discussed the proposals presented with colleagues and there are some accepted merits to the schemes with regards to general improvements to connectivity. It is also understood that with the expanding 'Knowledge Quarter' within Camden, it will be necessary to maintain and upgrade Telecoms/ Internet systems infrastructure and to provide up to date connectivity for academic institutions/ businesses/ Residents and other users. Having said that, there appears to be no immediate benefits for the residents living/ occupiers within blocks (who will have to put up with the installation work and any comings and goings in relation to ongoing maintenance). Please note: elsewhere it has been proposed to provide free internet connections to residents of host blocks as a way of increasing the public benefit of schemes of this nature (and to help get the residents on side – I did mention this on site).

Site visits both at roof top level and from street level/ public realm viewpoints have revealed that there would be several places around each site where the structures would be plainly visible from ground level. We should also consider the outlook from other buildings, and this is also considered to present an issue with regards visual impact.

To overcome the negative visual impacts of the proposed installations, we would suggest that any proposed equipment should be added to the existing features/ fabric of the buildings, e.g.) the existing central roof top structures, as this would minimise any impact of roof top 'clutter' by shielding/ masking new features (such as proposed

antennas). In these circumstances; it is generally considered preferable to add to an existing structure rather than create a new one, or to significantly alter the roof form.

Also; rather than installing scaffolding style rig structures to house the apparatus, greater care should be taken to assess the host building to provide a bespoke solution to the visual impact. There is particular concern about altering the roof-form when appreciated from longer views. For example; 3 or 4 or 5 new scaffold rigs are considered to significantly alter the roof form.

Officers have suggested that apparatus should be painted/ coloured to match the existing roof top in each case, to help blend the equipment with the roof and minimise visual impact. It may be beneficial to include tidying up of roof tops (sites in general) as part of any proposal to ensure the visual impact of any installations is not considered to be negative. It should be noted that where proposals have been welcome historically these included commitments to remove any unwanted equipment as part of the works.

Conservation and Heritage Officers also have particular concerns about the 'scaffolding' structures proposed to support antennas. In short, these are considered ugly. It is understood that it is far cheaper for the applicant(s) to propose more or less the same scaffolding rig structure at each site, however each site is different; and in order to minimise the visual impact of installations, each site should be treated as an individual design challenge rather than using a one size fits all approach. In this regard, it would be preferable to see antennas fixed directly to the host building (visual impact minimal), rather than constructing a 'rickety' tower to plonk them on (visual impact significant).

An alternative option would be to look at it from a different point of view. As stated above, it is acknowledged that there will be a greater need for more connectivity in general terms as technologies develop and demand increases, which in turn means there may also be demand for roof top space to house more telecoms equipment. And; given that our Heritage & Conservation Officers already have issues with the potential for the installations as proposed; it is probably worth pointing towards iconic examples of telecoms designs such as the K4 or K6 telephone box, designed by Giles Gilbert Scott in the 1920s/ 30s. Unfortunately, modern public realm telecoms equipment is generally not quite so elegant.

I am not suggesting that you propose installations of red telephone boxes on roof tops, however; I think it would be entirely beneficial in the longer term if the antennas, dishes and other apparatus to house them, were designed with greater thought about the aesthetic impacts. I would suggest that if a design as well thought of as traditional red telephone boxes were conceived for modern telecoms installations, then you might find sites actually welcome them as opposed to being reluctant or even rejecting them. I think it is certainly worthwhile asking the question; Why do telecoms dishes/ antennas need to look the way they do? Do they need to look the way they tend to? And if they don't need to look the way they do – why propose such designs within/ nearby conservation areas in close proximity to listed buildings? That is to say; surely 'a dish' or 'an antenna' are in essence a slightly concave surface, which I would suggest leaves quite a lot of room for creativity with regards to visual appearance.

The proposed installations for all sites are considered overly dominant. The height, bulk and massing of the structures are considered to have a negative impact on the host buildings visual appearance. It may be noted that; although we would expect installations to have a minimal visual impact in order to be acceptable, it may cause

less significant visual impact to propose a greater number of antennas positioned more discreetly, which would hopefully provide your clients with the same/ similar 'coverage' but without causing harm to the street scene, host buildings, adjacent conservation areas or nearby listed buildings.

Suggested improvements to the schemes as proposed would be; to attach antennas to either the existing solid roof top structure towards the middle of the roofs, so as not to create new roof top bulk or significantly alter the roof form, and/ or; to attach dishes to the existing parapets – also to minimise the visual impact. Although given the number of proposed antennas, this approach may also have issues without adequate forethought as to the precise locations of them. I acknowledge this may not be the best fit for the clients business operation, and colleagues would want to see this in plan before committing to acceptability. Also; It would be strongly advisable to consider the colour of the existing roof and other features present, and to specify proposed equipment coloured to match/ blend with the existing arrangements.

Alternatively, to come up with a better design for the antennas (and housing for them), which may potentially be more striking, but is nonetheless more appealing visually. This approach will be difficult, as it is obviously easier said than done to come up with an iconic design beloved by everyone, and again; colleagues would want to see this in plan before committing to acceptability. For the sake of economy it would be beneficial if this design could be replicated, and therefore installed in several locations going forwards.

Otherwise; bespoke designs for any host property would assist blending new structures/ features to minimise the visual impacts. In this manner you may arrive upon an acceptable 'iconic' design, that may then be replicated as described above. It is understood that bespoke designs may be more costly and for that reason unsuitable for the desired outcome, but would have a lesser impact visually.

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#### **Site planning history information:**

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The full planning history of the borough is available to view online here:

<https://planningrecords.camden.gov.uk/Northgate/PlanningExplorer/GeneralSearch.aspx>

I have not copied the entire history of each site which will be quite extensive in some cases, however; as suggested in our correspondence and following a chance to review the advice given here, should you require any information about a previous application/ decision, please let me know the reference number in question and I will explore this in more detail.

Please note: pre-planning advice is not publicly available, and so I am unable to provide any details of this for any site.

## **• Pre-app 1 – Monmouth House and Grangemill.**

**2020/0545/PRE, Monmouth House, Raglan Street. NW5 3BX.**

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Pre-app development description:

Pre-app development description.

Pre application for the installation of a telecommunications base station, comprising the installation of 12 no antenna, 2 no dishes, equipment cabinets and ancillary development thereto at ct11\_248993\_tef\_87405\_vf\_\_18030 monmouth house, raglan street, raglan street, london, nw5 3bx ngr e: 528911 n: 184950.

Preferred design/ proposal:

The requested preferred design is to position the antenna on the main roof level of Monmouth House (35.75m AGL). This will ensure that the site can provide the required replacement coverage, with the antennas set back as far possible from the main edge of the building. This will also ensure INCIRP compliance such that the main roof will not be restricted. The proposed equipment will be viewed within the context of the plant room (40.40m AGL) and existing antenna, aerials and satellite dishes and will be partially screened by the parapet wall. It is considered that given the scale of this building that the antenna will not be prominent in the street scene.

Monmouth House constraints/ Information:

- Camden housing block.
- Kentish Town Neighbourhood Forum.
- CIL charging zone.
- South press notice area.
- 13 Storey residential block
- Not listed.
- Not within a Conservation Area.

Monmouth House – site specific advice:

This block is 13 storeys in height and therefore visual impact from immediate street level will be quite minimal, however; this increases the potential for visual impacts in longer views. Furthermore; the surrounding street context of the site is such that there are positions from nearby street level where any installation as proposed will be plainly visible.

Proposed antennas and equipment should be positioned away from roof edges and brought towards the central plant room, and indeed preferably attached to the plant room itself instead of attached to scaffold rigs.

The only proposed elevation provided is for the 'West Elevation', should you apply for any installation we would encourage the provision of proposed elevations on all sides to ensure all aspects and implications are available during the consultation stages of an application.

We would also advise taking photographs from the public realm showing all views surrounding the site to accompany any application, and ideally these would be overlaid with the proposed installations to give an indication of how the installation would look should it receive approval and be installed.

Although the site is not within a conservation area, it is adjacent to both the Inkerman Conservation Area and the Bartholomew Estate Conservation Area, and given the height of the proposed site/ development, it is considered that this could have impact on the character of these conservation areas. The nearest listed building is on Kentish Town Road.

Due to this being a Council block, an acceptable access arrangement would need to be agreed in conjunction with the Housing Manager with any particular permission. It would be best practice for these arrangements to be conditioned to any decision notice for approval.

It would also benefit any such proposal if public improvements could be identified and proposed alongside telecoms installations, for example; the provision of wireless internet connections for occupants of the block would be welcomed. Additionally the tidying up of the roof top site would be beneficial to the proposals.

## 2019/5400/PRE, Grangemill, Ingestre Road. NW5 1XH.

### Pre-app development description:

Pre application consultation for the installation of a telecommunications site, comprising of the installation of 12no. antennas, 7no. cabinets, 2no. 0.6 metre dish antennas, 2no. 0.3 metre dish antennas and associated development at grangemill, 6-7 ingestre road, camden, london nw5 1xh (site ref 150303) ngr 528814 / 185803.

### Preferred design / proposal:

The requested preferred design is to position the antennas on the roof of the plant room. This will ensure that the site can provide the required replacement coverage, with the antennas set as far as possible from the main edge of the building as suggested in the delegated report. This will also ensure ICNIRP compliance such that access to the main roof will not be restricted. The proposed cabinets have been relocated to the plant room roof, to reduce feeder lengths and to reduce the amount of space taken up.

### Grangemill Constraints:

- Camden Housing block.
- Kentish Town Neighbourhood Forum
- CIL charging zone
- South press notice area
- 9 Storey residential block
- Not Listed
- Not in a conservation area

### Grangemill – site specific advice:

This block is 9 Storeys in height and similarly to other tall buildings visual impact from the immediate street level will be quite minimal however; this increases the potential for visual impacts in longer views. Furthermore; the surrounding street context of the site is such that there are positions from nearby street level where any installation as proposed will be plainly visible.

Rather than positioning antennas on the top of the central roof top structure adding further height and additional visual impact, it would be preferable from our point of view to see these positioned attached to the central roof structure instead of on bulky scaffolding.

(preferred view) The only proposed elevation provided is for the 'South-East Elevation', should you apply for any installation we would encourage the provision of proposed elevations on all sides to ensure all aspects and implications are available during the consultation stages of an application.

(alternative view) The only proposed elevation provided is for the 'North-East Elevation', should you apply for any installation we would encourage the provision of proposed elevations on all sides to ensure all aspects and implications are available during the consultation stages of an application. Although in this option the antennas are positioned considerably lower, it will remain to be seen how impactful this

approach may be from other views.

We would also advise taking photographs from the public realm showing all views surrounding the site to accompany any application, and ideally these would be overlaid with the proposed installations to give an indication of how the installation would look should it receive approval and be installed.

Although the site is not within a conservation area, it is adjacent to the Dartmouth Park Conservation Area, and given the height of the proposed site/ development, it is considered that this could have impact on the character of the conservation areas. Additionally, the locally listed Gardens of the York Rise Estate are within close proximity of the site.

Due to this being a Council block, an acceptable access arrangement would need to be agreed in conjunction with the Housing Manager with any particular permission. It would be best practice for these arrangements to be conditioned to any decision notice for approval.

It would also benefit any such proposal if public improvements could be identified and proposed alongside telecoms installations, for example; the provision of wireless internet connections for occupants of the block would be welcomed. Additionally the tidying up of the roof top site would be beneficial to the proposals.

## **• Pre-app 2 – 1 St Giles High St, Albion House & Prospect House.**

**2019/5697/PRE, 1 St Giles High Street, WC2H 8AH.**

### Pre-app development description:

pre application for the installation of a telecommunications base station, comprising the installation of 10 no antenna, 2 no dishes, equipment cabinets and ancillary development thereto at ct1l\_242201\_20\_tf\_81554\_vf\_15320 1 st giles high street, london, wc2h 8ag ngr e: 529969 n: 181329.

### Preferred design / proposal:

The requested preferred design is to position the antenna on the upper roof level of 1 St Giles Street (46.50m AGL). Utilising an existing building is in complete accordance with national planning guidance, as the proposed antennas are out of the general eye line of the casual onlooker. Thus the visual presence of the radio base station will be minimised. This is especially so as the height of the host building is some 46.50m and the top height of the antennas is circa 49.00m. Therefore, the antennas will barely be noticeable once in situ even if the general public were to crane their necks upwards in an unnatural stance to see glimpses of the new antennas. The area is already established with rooftop antennas as Castlewood House opposite had the operator's equipment on it, up until recently. The proposed antennas will appear very similar to these. The building mass of 1 St Giles Street will also ensure that the antennas will not be overly visible from ground level. This point is clearly demonstrated by the site line diagrams, design justification sketches which form part of this pre-application enquiry submission pack.

### 1 St Giles High Street constraints:

- Community Association Consultation Zones – Covent Garden Community Association.
- Business Improvement District – InMidtown.
- CIL Charging Zone.
- Central London Area - part of the Borough that lies within the historic central core of London and is dominated by activities of London-wide, national and international significance.
- CMP Priority Area – south of Euston Road.
- Cross Rail Area.
- Cross Rail 1KM Buffers Region - Tottenham Court Road.
- Cross Rail Contribution Zone.
- Clear Zone Area – Central London Area.
- Fitzrovia Area Action Plan.
- Local Plan Centre – Tottenham Court Road.
- South Press notice Area.
- TFL Underground Zone of Interest/ Influence.
- 16 Storey Building.
- Not listed.
- Not in a conservation area.

No.1 St Giles High Street – site specific advice:

This block is 16 storeys in height and similarly to other tall buildings visual impact from the immediate street level will be quite minimal however; this increases the potential for visual impacts in longer views. Additionally due to the proximity of many other tall buildings in the vicinity, view of the site roof top are appreciable from several locations nearby. Furthermore; the surrounding street context of the site is such that there are positions from nearby street level where any installation as proposed will be visible.

It is welcomed to see the proposed antennas attached to existing 'grillage' as opposed to upon bulky scaffold rigs, however rather than positioning antennas vertically it would be preferable to see these positioned horizontally to minimise the overall impacts.

We have only been provided with a proposed West elevation, should you apply for any installation we would encourage the provision of proposed elevations on all sides to ensure all aspects and implications are available during the consultation stages of an application.

We would also advise taking photographs from the public realm showing all views surrounding the site to accompany any application, and ideally these would be overlaid with the proposed installations to give an indication of how the installation would look should it receive approval and be installed.

Although the site is not within a conservation area, it is surrounded by the Bloomsbury Conservation Area, the Seven Dial Covent Garden Conservation Area and the Denmark Street Conservation Area, and given the height of the proposed site/ development, it is considered that this could have impact on the character of the conservation areas. Additionally, there are very many listed buildings in close proximity to the site.

It would also benefit any such proposal if public improvements could be identified and proposed alongside telecoms installations, for example; the provision of wireless internet connections for occupants of the block would be welcomed. Additionally the tidying up of the roof top site would be beneficial to proposals, although it may be noted that roof access was not provided as part of this pre-app.

## 2020/0552/PRE, Albion House, 55-59 New Oxford St. WC1A 1BS.

### Pre-app development description:

Pre application for the installation of a telecommunications base station, comprising the installation of 9 no antenna, 5 no dishes, equipment cabinets and ancillary development thereto at ct1l\_242202\_vf\_15321 Albion house, 5559 New Oxford Street, London, WC1A 1BS ngr e: 530052 n: 181421.

### Preferred design / proposal:

The requested preferred design is to position the antenna on the plant roof level of Albion House (30.70m AGL). The plant room roof is set well back from the main roof ridge. Therefore, the antennas will be further shielded from external vantage points at ground level. The area is already established with rooftop antennas as Castlewood House nearby had the operator's equipment on it, up until recently. The proposed antennas will appear very similar to these. It is considered that given the scale of this building that the antenna will not be prominent in the street scene.

### Albion House (55-59 New Oxford St) Constraints:

- Community Association Consultation Zones – Covent Garden CA & Charlotte Street CA.
- Business Improvement District – InMidtown.
- Conservation Area – Bloomsbury.
- CIL Charging Zone.
- Central London Area - part of the Borough that lies within the historic central core of London and is dominated by activities of London-wide, national and international significance.
- CMP Priority Area – south of Euston Road.
- Cross Rail Area.
- Cross Rail 1KM Buffers Region - Tottenham Court Road.
- Cross Rail Contribution Zone.
- Clear Zone Area – Central London Area.
- Fitzrovia Area Action Plan.
- Local Plan Centre – Tottenham Court Road.
- South Press notice Area.
- TFL Underground Zone of Interest/ Influence.
- Not listed.
- Not in a conservation area.

### Albion House – site specific advice:

This block is 10 storeys in height and although quite tall, the position on a corner site means it is more easily appreciated from the nearby surrounding streets. Additionally due to the proximity of many other tall buildings in the vicinity, view of the site roof top are appreciable from several locations nearby.

Proposals as shown in elevation here are not considered to be sympathetic to the host building. Rather than positioning antennas on the top of the central roof top structure adding further height and additional visual impact, it would be preferable from our point of view to see these positioned attached to the central roof structure instead of on bulky scaffolding.

We have only been provided with a proposed North East elevation, should you apply for any installation we would encourage the provision of proposed elevations on all sides to ensure all aspects and implications are available during the consultation stages of an application.



We would also advise taking photographs from the public realm showing all views surrounding the site to accompany any application, and ideally these would be overlaid with the proposed installations to give an indication of how the installation would look should it receive approval and be installed.

The site is within the Bloomsbury conservation Area, and also adjacent to nearby conservation areas, and; given the height of the proposed site/ development, it is considered that this could have impact on the character of the conservation areas. Additionally, there are very many listed buildings in close proximity to the site.

It would also benefit any such proposal if public improvements could be identified and proposed alongside telecoms installations, for example; the provision of wireless internet connections for occupants of the block would be welcomed. Additionally the tidying up of the roof top site would be beneficial to proposals, although it may be noted that roof access was not provided as part of this pre-app.

## 2020/0551/PRE, Prospect house, 100 New Oxford St. WC1A 1HB.

### Pre-app development description:

Pre application for the installation of a telecommunications base station, comprising the installation of 6 no antenna, 2 no dishes, equipment cabinets and ancillary development thereto at ct1l\_237044\_tf\_81555 100 New Oxford Street, London, WC1A 1HB NGR E: 529960 N: 381445.

### Preferred design / proposal:

The preferred design is to position the antenna on the main roof level of 100 New Oxford Street (31.30m AGL). Utilising an existing building is in complete accordance with national planning guidance, as the proposed antennas are out of the general eye line of the casual onlooker. Thus the visual presence of the radio base station will be minimised. This is especially so as the height of the host building is some 31.30m and the top height of the antennas is 32.7m. Therefore, the antennas will barely be noticeable once in situ even if the general public were to crane their necks upwards in an unnatural stance to see glimpses of the new antennas. The area is already established with rooftop antennas as Castlewood House opposite had the operator's equipment on it, up until recently. The proposed antennas will appear very similar to these. The building mass of 100 New Oxford Street will also ensure that the antennas will not be overly visible from ground level. This point is clearly demonstrated by the site line diagrams, design justification sketches which form part of this pre-application enquiry submission pack. Please refer to the attached documents.

### Prospect House Constraints:

- Community Association Consultation Zones – Covent Garden CA & Charlotte Street CA.
- Business Improvement District – InMidtown.
- Conservation Area – Bloomsbury.
- CIL Charging Zone.
- Central London Area - part of the Borough that lies within the historic central core of London and is dominated by activities of London-wide, national and international significance.
- CMP Priority Area – south of Euston Road.
- Cross Rail Area.
- Cross Rail 1KM Buffer Region – Tottenham Court Road

- Cross Rail Tram Drivers Region - Tottenham Court Road.
- Cross Rail Contribution Zone.
- Clear Zone Area – Central London Area.
- Fitzrovia Area Action Plan.
- Local Plan Centre – Tottenham Court Road.
- South Press notice Area.
- TFL Underground Zone of Interest/ Influence.
- Not listed.
- Not in a conservation area.

Prospect House – site specific advice:

This block is of mixed heights, but raised to a maximum of 9 storeys above ground level. The position of many other tall and taller buildings in close proximity means the roof top can be appreciated from many nearby locations.

The relocated proposal shown in elevation is not considered to be appropriate and is considered to high for this building. Rather than positioning antennas on very high masts it would be preferable to see these positioned attached to the central roof structure instead.

We would need to see proposed elevations from all sides to properly assess the impacts and We would also advise taking photographs from the public realm showing all views surrounding the site to accompany any application, and ideally these would be overlaid with the proposed installations to give an indication of how the installation would look should it receive approval and be installed.

The site is within the Bloomsbury conservation Area, and also adjacent to nearby conservation areas, and; given the height of the proposed site/ development, it is considered that this could have impact on the character of the conservation areas. Additionally, there are very many listed buildings in close proximity to the site, particularly Banbridge House to the rear.

It would also benefit any such proposal if public improvements could be identified and proposed alongside telecoms installations, for example; the provision of wireless internet connections for occupants of the block would be welcomed.

As mentioned at the top of this e-mail, I will send advice relating to pre-app 3 (Englefield and Weech Hall) tomorrow morning.

Kind regards,  
Matthew

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Matthew Dempsey  
Planning Technician

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**From:** Dianne Perry <tweeddevelopmentplanning@gmail.com>

**Sent:** 04 February 2020 17:41

**To:** Dempsey, Matthew <Matthew.Dempsey@Camden.gov.uk>