

<b>Delegated Report</b>		<b>Analysis sheet</b>		<b>Expiry Date:</b>		07/05/2020	
		N/A / attached		<b>Consultation Expiry Date:</b>		27/04/2020	
<b>Officer</b>				<b>Application Number(s)</b>			
Sofie Fieldsend				2020/1374/P			
<b>Application Address</b>				<b>Drawing Numbers</b>			
Farjeon House Hilgrove Road London NW6 4TL				See decision notice			
<b>PO 3/4</b>		<b>Area Team Signature</b>		<b>C&amp;UD</b>		<b>Authorised Officer Signature</b>	
<b>Proposal(s)</b>							
Installation of 12x antenna apertures, 4x 600mm diameter dishes, 7x equipment cabinets and supporting steelwork at roof level. Installation 1x cabinet at ground-level, plus ancillary development.							
<b>Recommendation(s):</b>		i) Prior approval required ii) Prior approval refused					
<b>Application Type:</b>		GPDO Prior Approval Determination					
<b>Conditions or Reasons for Refusal:</b>		Refer to Decision Notice					
<b>Informatives:</b>							
<b>Consultations</b>							
<b>Adjoining Occupiers:</b>		No. notified	<b>00</b>	No. of responses	<b>00</b>	No. of objections	<b>00</b>
				No. electronic	<b>00</b>		
<b>Summary of consultation responses:</b>		A site notice was displayed on the 03/04/2020 and the consultation period expired on the 27/04/2020.  No responses received during the consultation period.					

## Site Description

The application building is nine storey detached property and the site is located on the corner of Hillgrove Road and Finchley Road. The building is occupied by residential units (C3 use).

The building is not listed or located within a Conservation Area. Regency House directly opposite the site is Grade II listed.

## Relevant History

### Application site

None relevant.

### Neighbouring sites:

**Pavement on North of Railway Cutting on Loudoun Road South West of 24 Hilgrove Road: 2019/0062/P** - Installation of telecommunications equipment comprising of 1 x new 12.5m high monopole and 2 x new associated equipment cabinets on the pavement. - **Prior Approval required and granted 26/02/2019**

**pavement north of railway cutting west of Gillies House, Hilgrove Road 2017/5572/P** - Installation of telecommunications equipment comprising a 15m high monopole with 2 antennas inside shroud and 2 dishes, plus 2 associated equipment cabinets on pavement. - **Prior Approval required and granted 15/11/2017**

### **Centre Heights, 137 Finchley Road, NW3 6JG**

**PWX0003051** – Erection of telecommunications equipment cabins on the roof area of Centre Heights, 137 Finchley Road (Application for determination under Part 24 of the General Permitted Development Order 1995).- **Granted 27/02/2001**

## Relevant policies

### **National Planning Policy Framework (2019)**

### **London Plan (2016)**

### **Intend to publish London Plan (2019)**

### **Camden's Local Plan (2017)**

- A1 - Managing the impact of development
- D1 - Design
- D2 – Heritage
- T1 - Prioritising walking, cycling and public transport

### **Supplementary Guidance**

- CPG Design (2019)
- CPG Amenity (2018)
- CPG Digital infrastructure (2018)

## Assessment

### 1. Proposal

1.1 The application has been submitted under Part 16 of schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order (GPDO) 2015 (as amended).

1.2 The proposal involves the installation of new telecommunications equipment on the existing rooftop area of the application building and would comprise: Installation of 12x antenna apertures, 4x 600mm diameter dishes, 7x equipment cabinets and supporting steelwork at roof level. Installation 1x cabinet at ground-level, plus ancillary development.

1.3 The existing roof level of the building is between 27.1-27.7m (approximate) above ground level. The top of the highest proposed mounting pole would result in an overall maximum height above ground level of approximately 32.1m. The proposed equipment cabinet at ground floor would be located beside an existing equipment cabinet facing Hillgrove Road

1.4. There does not appear to be planning permission for the existing rooftop equipment.

### 2.0 Assessment

2.1 Prior approval is required for this type of development as it includes the installation of an antennae (including any supporting structure) which exceeds the height of the building or structure (other than a mast) by 4 metres or more at the point of where it is installed or to be installed.

2.2 The main considerations in relation to this proposal are:

- Applicant's Justification
- Siting and Design
- Planning balance

### 3.0 Applicant's Justification

3.1 The proposals are based on the principle of meeting operational requirements of the mobile operators EE and Three. It will replace their apparatus on the Centre Heights building, 137 Finchley Road, NW3 6HY which is due to be redeveloped. Prior approval was granted in 2001 for this site under planning ref. PWX0003051. The application site is over 177m away from the Centre Heights building. The equipment would improve 2G, 3G, 4G and 5G coverage in the area. The applicant states that larger antennas than the existing ones are required and that it would provide for two separate mobile phone operators have influenced their scale and number. They claim the antennas cannot be shrouded as this would interfere with their signal.

3.2 The applicant has provided no information for this site selection apart from that is in close proximity to the soon to be decommissioned base centre at 137 Finchley Road and that it is owned by the same landlord (Camden Council). The supplementary information document provided states that 23 other alternative sites have been identified to install the equipment. This information identified that there are alternative suitable sites however this have been discounted. The reasoning given for discounting 21 of the 23 alternative sites is considered to be vague and not enough site specific information has been given to justify why these locations are not suitable and have been ruled out. Overground House, Finchley Road was ruled out because of its roof design which would not have been compatible with affixing of the proposed communications apparatus. Langhorne Court,

Dorman Way, NW8 6NJ is another site that was assessed and acknowledged that this would be a suitable alternative for the proposal.

3.3 The applicants have declared with appropriate documentation that all of the proposed equipment would comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) standards on emission levels in accordance with government guidelines.

#### **4. Siting and design**

4.1 Local Plan Policies D1 (Design) and D2 (Heritage) are aimed at achieving the highest standard of design in all developments. Policy D1 requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including listed buildings.

4.2 CPG Digital Infrastructure states that "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."

4.3 It is noted that the Council have also recently granted permission on the same road and neighbouring Loudoun Road which are in close proximity to the site for two monopole telecoms equipment owned by EE and Three under planning ref.'s 2017/5572/P (55m away) and 2019/0062/P (228m away) (see planning history section above). It is unclear from the information provided if these recent permissions have been included in their cover provision maps included in their site specific supplementary information document.

4.4 Whilst officers note that the siting of telecoms equipment on the roofs of residential tower blocks is common due to their height and the limited visibility such equipment would have if positioned correctly, the proposed works are not considered acceptable in this instance. The application site is a relatively high residential block of 9 storeys which sits on a wide, open and prominent junction with varying topography which means that its rooftop is clearly visible in long and short range views from a variety of vantage points including Hilgrove Road, Finchley Road and Adelaide Road

4.5 Whilst it is acknowledged that there are some smaller scale (in terms of height, number and rooftop footprint occupied) existing telecoms equipment on the roof of the building, the proposed siting of the more bulky cabinets and taller equipment on the roof's edge would be highly visible and constitute proliferated clutter on this rooftop. It is considered that even if the equipment and antennae were to be located into a more discreet position in the middle of the roof, they would still be very prominent and cause unacceptable visual harm to the area. Therefore the number and location of the telecoms equipment on this rooftop cannot be supported.

4.6 The proposed 7x rooftop equipment cabinets are located along the western elevation of the existing roof with a setback of 1.1m from the edge. The height of the proposed cabinets range from 1.5m-2.5m high. Although it is noted that the cabinets are set in from the elevation facing the junction between Finchley Road and Hilgrove Road, due to their height it is possible that there could be some visibility from the street.

4.7 The 12x antenna apertures, would be installed on the edge of the roof on the western and southern elevations and would be highly visible from the surrounding area. The number, height and location of these poles will make the equipment very prominent and clearly visible in long and short range views from Hilgrove Road, Finchley Road and Adelaide Road.

4.8 Twelve antenna apertures would result in a proliferation of visual clutter at roof level. Little justification has been provided why so many antennas are required here, apart from the fact that an equal number are required for each provider (EE and Three). Secondly, the 5.4m (4.4m above the existing parapet) height of the poles is considered excessive. It is considered that even if the antennas were lowered and could still allow an uninterrupted radio reception sightline that as the block is higher than all surrounding buildings that they would still be highly visible. Thirdly, their location on the roof edge results in them being very prominent. However, Given that the building is considerably higher than anything else around it and located on a prominent corner plot at the junction of two roads with clear visibility from all sides, it is unlikely that moving the antennas further into the middle of the roof or reducing their heights would significantly reduce their visibility.

4.9 Farjeon House occupies a visually prominent location at the junction of Finchley and Hilgrove Roads. The building is dominant in views from the north and south along Finchley Road, from the east along Adelaide Road, and from the south-west along Hilgrove Road. The location is not within a conservation area but does contribute significantly to the character and integrity of the streetscape, as well as forming part of the setting for the Grade II listed interwar Regency Lodge located on the other side of Finchley Road.

4.10 Looking north along Finchley Road it can be seen that Forjeon House and Regency Lodge have a strong visual relationship and stand sentinel either side of the road. This relationship is strengthened by the greater visibility created by the presence of the junction and the low-rise housing to the south of the junction.

4.11 Visual clutter and the proliferation of insensitively sited, prominent and bulky telecommunications equipment can have a detrimental impact on the long and short views including shared views with Regency Lodge.

4.12 Camden policy supports uncluttered roofscapes which detract from the surrounding environment in policy D1 and D2. Any intervention at rooflevel for telecoms equipment should harmonise with the underlying design ethos of the host building and streetscape rather than detract from its character and appearance. It is considered that the equipment in terms of its siting, bulk and proliferation has not been carefully considered and no attempt has been made to screen or conceal the equipment. Therefore the visibility of the proposed equipment is exacerbated by the long/ medium distance views of the building.

4.13 The setting of Regency Lodge is compromised by the current proposal which seeks to introduce visually prominent, bulky as well as tall equipment. The current cleanness of the eaves-line which is mirrored across the road enhances the way these two buildings frame Finchley Road and Farjeon House acknowledges the presence of Regency Lodge. The proposed telecommunications equipment is therefore considered to cause unacceptable harm to the historical setting of the listed building with public views being compromised. When viewed together the additional height and clutter would detract from the setting of the listed building.

4.14 It has been noted that no consideration has been made to enhance the host building by siting apparatus sympathetically or including screening which may soften the appearance from street level, and to address the requirements of Section 10 (Telecommunications) of the NPPF (2019).

4.15 It is accepted that telecommunications equipment by the nature of their functional design and aesthetic may not blend seamlessly with an existing building, however, given the above, it is considered that the antennas and poles, by virtue of their excessive number and height and their prominent siting, would result in a proliferation of harmful visual clutter which would be unattractive and over-dominant on the host building and would cause harm to the character and appearance of the wider townscape.

4.16 Although the equipment cabinet at ground floor would be located on a slope, the Council do not raise issue with its location within an enclosed private grassed area next to an existing equipment cabinet. This element would be acceptable in terms of its scale and siting.

## **5.0 Planning balance**

5.1 Local Plan Policy D1 and D2, consistent with Section 16 (Conserving and enhancing the historic environment) of the NPPF (2019) seeks to preserve and enhance heritage assets, stating that the Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

5.2 Given the assessment outlined above, it is considered that the proposed telecommunications equipment would result in harm to the setting of the adjacent listed building (Regency House). It is recognised that the proposed scheme would result in better network coverage, and as such, some public benefit would be derived from the scheme however, weighing the harm caused as a result of the development against this public benefit, the proposal is considered to be contrary to Section 16 of the NPPF (2019) which seeks to preserve heritage assets.

5.3 The proposal would therefore fail to accord with policies D1 and D2 of the Camden Local Plan 2017, and Section 16 of the NPPF (2019). The development would create overly dominant visual clutter on a prominent roofscape, causing harm to the host and neighbouring buildings, local views from the street and setting of the adjacent listed building.

## **6.0 Recommendation**

6.1 Prior Approval Required – Approval refused on grounds of unacceptable siting and design.