

Delegated Report	Analysis sheet		Expiry Date:	14/05/2020
	N/A		Consultation Expiry Date:	09/05/2020
Officer		Application Number(s)		
Nathaniel Young		2020/1456/P		
Application Address		Drawing Numbers		
Haddo House, Highgate Road London NW5 1PX		See decision notice		
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature	
Proposal(s)				
Installation of telecommunications equipment on rooftop comprising 3 antennas on poles, 3 cabinets and ancillary works, plus 1 meter cabinet at ground level.				
Recommendation(s):		i) Prior approval required ii) Prior approval refused		
Application Type:	GPDO Prior Approval Determination			
Conditions or Reasons for Refusal:	See Decision Notice			
Informatives:				
Consultations				
Adjoining Occupiers:	No. of responses	47	No. of objections	47
Summary of consultation responses:	Site notice: displayed from 15/04/2020 to 09/05/2020 Thirty five objection comments received from various occupiers of Haddo House raising the following concerns: <ul style="list-style-type: none"> • Antennae and cabinets will result in visual clutter which would detract from the character and appearance of Haddo House and the Dartmouth Park Conservation Area. • Exposure to 5G has adverse effects on human health. • Criticism of timing of application, lack of engagement and deferral request. <u>Officer response</u> <ul style="list-style-type: none"> • Officers agree that the proposed development would result in harmful 			

visual clutter which would detract from the character and appearance of Haddo House and the Dartmouth Park Conservation Area.

- 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. Although the residents' objections on health grounds is acknowledged, given the details provided by the applicant and the requirements of legislation regarding 'prior approval' applications, this cannot constitute a reason for refusal.*
- This is not a Council application. The Council does not control when applicants submit an application, nor how they engage with stakeholders.*

Site Description

Haddo House is a 7-storey residential block of flats on a site bounded by Glenhurst Avenue to the north-west, Highgate Road to the north-east and Gordon House Road to the south-east.

Haddo House is not listed but has been identified as being positive contributor to the Dartmouth Park Conservation Area of which it forms part.

Relevant History

2011/5732/P: Installation of 2 communal satellite dishes, a new antenna with associated equipment and 2 cabinets on roof plus new external cable runs on SW elevation of block to each residential flat (Class C3). **Approved 10.01.2012.**

Relevant policies

National Planning Policy Framework 2019

The London Plan March 2016

The London Plan intended to publish 2020

Camden Local Plan 2017

A1 Managing the impact of development

A2 Open space

D1 Design

D2 Heritage

Dartmouth Park Neighbourhood Plan 2020

DC1 Enhancing the sense of place

DC2 Heritage assets

DC3 Requirement for good design

Camden Planning Guidance (CPG)

CPG Amenity (2018)

CPG Design (2019)

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 proposals involves the installation of new telecommunications equipment on the existing rooftop area of the application building and would comprise: 3 antennas on poles, 3 sets of equipment labelled as 'RRHs' on plans, 3 cabinets and ancillary works, all at roof level, plus 1 meter cabinet at ground level.

1.3 The existing roof level of the building is approximately 23m above ground level (with two turrets which reach approximately 25m high). It has several TV aerials and satellite dishes. The proposed antennas on poles are approx. 2.8m high so that they project about 0.6m above the highest part of the towers on the roof at 25m. The proposed equipment cabinets would be located towards the north end of the lower roof adjoining the upper roof storey.

1.4 It should be emphasised that the applicant is seeking prior approval for the siting and appearance of the equipment only. As a result, as required by legislation, it is not possible for objections to be raised on any other grounds, such as health.

2. Justification

2.1 The proposals are associated with Vodafone Limited entering into an agreement with Telefónica UK Limited in which the two companies plan to jointly operate and manage a single network grid across the UK. The equipment would improve 3G and 4G coverage in the area.

2.2 The applicant's submission states that the site is identified as the most suitable option that balances operational need with planning policies and guidance. It will deliver public benefit in terms of the mobile services it will provide. The coverage plots show existing deficiency in the area for network coverage and the improvement predicted to fill a substantial coverage gap within Highgate, ie. the coverage will be upgraded to 'dense urban' instead of 'dense suburban'. The applicant has shown that 7 alternative sites were considered but deemed inferior or unfeasible for technical and visual grounds.

2.3 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. Although the residents' objections on health grounds is acknowledged, given the details provided by the applicant and Government advice on health issues regarding mobile phone masts, this cannot constitute a reason for refusal.

2.4 The mast is not anticipated to have any direct impact on public health. Furthermore, the mast is sufficiently far away from residential properties on all sides so as to not add to a perception of risk to health. There will be no impact on residential amenity in terms of loss of light or outlook.

3. Siting and Design

3.1 Local Plan Policies D1 (Design) and D2 (Heritage), and Dartmouth Neighbourhood Plan Policies DC1 (Enhancing sense of place), DC2 (Heritage assets) and DC3 (Requirement for good design) 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; Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. Furthermore, Policy A2 (Open space) seeks to protect the borough's open space and resist development which would be detrimental to the setting of designated open spaces.

3.2 It is noted that the siting of telecoms equipment on the roofs of residential tower blocks is common and regarded acceptable due to their height and their limited visibility where positioned correctly. However in this instance, the proposed works are not considered acceptable due to the high level antennas in a prominent location. The application site is a relatively high residential block of 7 storeys which is surrounded by low level housing along Gordon House Road, Highgate Road, Chetwynd Road and Glenhurst Avenue. As a result of this contrast between the height of the host property and the low level neighbouring properties, and the setting of the host building with open space surrounding it, the roof of Haddo House is clearly visible in short, medium and long range views from a variety of vantage points including Parliament Hill. Therefore, 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 would cause unacceptable visual harm to both the building and local area.

3.3 As stated in the site description above, the site is in a sensitive and highly visible location with short, medium and long range views available of all sides of the building from the public realm. The building has a relatively clean and uncluttered roofline with only some TV aerials and satellite dishes on it. The proposed cabinets, low level RRH units and cable trays are not considered to cause significant harm due to their modest size, low height and discreet siting so that they will be barely noticeable from ground level. The ground level cabinet is considered acceptable as it has no impact on the roof. However the proposed 3 antennas on poles, approx. 3m high, are considered to create unwelcome prominent visual clutter on the roof and would harm the clean design and uncluttered roofline of this attractive modern building. They would also cause unacceptable harm to the character and appearance of the Dartmouth Park Conservation Area on account of their prominence in the roofscape, where they would be highly noticeable against the skyline and clearly visible from public views. The antennas would upset the largely uncluttered roof when viewed from within the Conservation Area and would appear unsightly when viewed from the Parliament Hill Metropolitan Open Land.

3.4 Given the above, it is considered that the antennas, by virtue of their height and prominent siting, would result in a proliferation of harmful prominent visual clutter which would be unattractive and over-dominant on the host building and would cause harm to the character and appearance of the Dartmouth Park conservation area and wider townscape.

4. Planning balance

4.1 Local Plan Policies D1 and D2, Dartmouth Park Neighbourhood Plan Policies DC1, DC2 and DC3, consistent with Section 16 (Conserving and enhancing the historic environment) of the NPPF (2019) which seeks to preserve and enhance heritage assets, states 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.

4.2 Given the assessment outlined above, it is considered that the proposed telecommunications equipment would result in harm to the character and appearance of the subject positive contributor building and the wider Dartmouth Park Conservation Area. 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, in weighing the harm caused as a result of the development against this public benefit, the proposal is considered to be contrary to advice within the NPPF (2019). Para 196 of the NPPF states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. The proposal in this case would result in 'less than substantial harm' to the character and appearance of the conservation area as well as to the host property. However it is considered that the limited benefits of improved network coverage are not outweighed by the 'less than substantial' harm caused by the installation of such equipment, in accordance with the balancing exercise as set out in the NPPF.

4.3 Considerable importance and weight has been attached to the harm and special attention has been paid to the desirability of preserving or enhancing the character or appearance of the conservation area,

under s.72 of the Listed Buildings and Conservation Areas Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013

4.4 The proposal would therefore fail to accord with policies D1, D2 and A2 of the Camden Local Plan 2017 and policies DC1, DC2 and DC3 of the Dartmouth Park Neighbourhood Plan. The proposed antennae would create overly dominant visual clutter on a prominent roofscape, causing harm to the host building, local views from the street and nearby public green spaces and to the character and appearance of the Dartmouth Park Conservation Area.

5.0 Recommendation

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