

Delegated Report		Analysis sheet		Expiry Date:		14/12/2020	
		N/A / attached		Consultation Expiry Date:		13/12/2020	
Officer				Application Number(s)			
Matthew Dempsey				2020/4851/P			
Application Address				Drawing Numbers			
110 High Holborn London WC1V 6EU				See decision notice.			
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature				
Proposal(s)							
Installation of telecommunications equipment at roof level comprising two 3m high support poles with 2 antennas each and one 5m high support pole with 1 antenna, plus 3 cabinets and ancillary works.							
Recommendation(s):		i) Prior Approval Required ii) Prior Approval Refused					
Application Type:		GPDO Prior Approval Determination					
Conditions or Reasons for Refusal:		Refer to Draft Decision Notice					
Informatives:							
Consultations							
Adjoining Occupiers:	No. notified	00	No. of responses	00	No. of objections	00	
Summary of consultation responses:	A Site Notice was displayed from 11/11/2020, which expired 05/12/2020. A Press Notice was published 19/11/2020, which expired 13/12/2020.						
CAAC/Local groups* comments: *Please Specify	N/a.						

Site Description

The application site is a ten storey commercial building of mixed retail and offices uses to the northern side of High Holborn. No.110 High Holborn spans the junction of Proctor Street with vehicular and pedestrian traffic passing beneath. The building is of modern design with glazed frontages to High Holborn and Proctor Street. It is not within a conservation area boundary; however it is closely surrounded by the Bloomsbury Conservation Area, and there are several Listed Buildings in close proximity.

The application in question relates to the roof top of the building where there is some existing plant equipment in place housed behind the parapets.

Relevant History

2020/2792/P - Installation of 6 antennas, 3 cabinets and ancillary works at roof level.
Prior Approval Required, Approval Refused 17/09/2020.

Related Appeal Decisions:

Appeal A Ref: APP/X5210/C/18/3199851 & Appeal B Ref:

APP/X5210/C/18/3201008 - Land at Crown House, 265-267 Kentish Town Road, London NW5 2TP.

Re: 'installation of communications antennae along with associated fixings and cabling on the flat roof of the commercial building.' (Enforcement Notice Ref: EN17/0611).

Appeal A Dismissed and Enforcement Notice Upheld, Planning Permission Refused.

Appeal B Dismissed and Enforcement Notice Upheld. 09/11/2018.

Relevant policies

National Planning Policy Framework (2019)

The London Plan (2016)

The London Plan (intend to publish) 2019

Camden Local Plan (2017)

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

Camden Planning Guidance:

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

Code of Best Practice on Mobile Network Development (November 2016)

Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

Assessment

1.0 Proposed development:

1.1 The application has been submitted under Part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order (GDPO) 2015 (as amended). The GDPO sets out the details in regard to the type of development for which planning permission is 'deemed' to be granted, more commonly known as 'permitted development'. In particular, the application seeks determination as to whether the prior approval of the Local Planning Authority is required as to the siting and appearance of the proposed development in relation to telecommunications equipment.

1.2 In this instance, Prior Approval is sought to install new telecommunications equipment at the existing rooftop area of the subject building. The proposed development would comprise the installation of five antennas, three cabinets and ancillary works such as associated cabling and safety handrail installations.

1.3 One antenna would be fitted to a pole fixed adjacent to the parapet to the High Holborn side of the roof, and four antennas would be fitted to poles (two antennas to each pole) fixed more centrally at roof level towards the Proctor Street frontage and to a lesser extent towards Catton Street. The three proposed cabinets would also be positioned centrally, adjacent to the cluster of four antennas.

1.4 The existing roof level is approximately 31.5m from ground level. The highest part of the proposed development would be approximately 33.3m from ground level. Cabinets and other equipment would be positioned slightly lower, with an approximate height of 31.8m from ground level.

2.0 Justification:

2.1 The proposal is a new installation intended to enhance existing network services by increased capacity and allow for new 5G provision in the area. The proposed development would enable the provision of 2G, 3G, 4G and new 5G services for the Telefonica and Vodafone mobile network in this part of London.

2.2 The applicant has provided evidence to show that they have explored alternative development sites within the vicinity of the proposed site location, and given reasons why these alternative sites were not chosen (see page 13 of Site Specific Supplementary Information document).

2.3 The applicant has indicated that prior to the submission of this application a pre-application consultation was undertaken with the LPA. However no record or any formal pre-app can be found on the LPA database, as confirmed by the site planning history above. It is noted that a very similar scheme submitted by the same applicant was refused Prior Approval less than one month prior to the submission of this application- see the planning site history above. The new scheme is identical to that refused except that it now has one antenna on a monopole at the front rather than 2 antennas sharing a pole.

2.4 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.

2.5 Members of the public cannot unknowingly access areas close to the antennas where exposure may exceed the guidelines. Therefore, the equipment is not anticipated to have any direct impact on public health.

2.6 There would be no impact on residential amenity in terms of loss of light or outlook.

3.0 Siting and appearance:

3.1 The host property is located in a prominent position fronting a main arterial highway and spanning the junction of another busy road. The building is an imposing local structure which contributes to the surrounding roofscape, being ten storeys in height; it is significantly higher than both its neighbouring buildings. The highest elements of the roof can be appreciated in long views from various locations, including both directions along High Holborn and also from Proctor Street to the rear.

3.2 Although the site is not within a conservation area, its position is such that the site is enveloped by the Bloomsbury Conservation Area on all sides. Furthermore, there are several listed buildings in close proximity, specifically- No.233 High Holborn which is directly opposite, No. 247-252 High Holborn to the South East of the site, and No.114-115 High Holborn to the West (all of which are Grade II listed building Heritage assets); also Nos.2, 4 & 6 Southampton Row to the North-West (Grade II* listed).

3.3 A sample of the street view from High Holborn demonstrating the prominence of the roofscape can be seen below:



Note: There is no visible existing roof top equipment along this stretch of High Holborn. The proposed antenna would be installed close to the parapet edge at a height of approximately 3m above the currently unaltered main roofline.

3.4 Policy D1 of the Camden Local Plan seeks to secure high quality design in development. Policy D2 (Heritage) states that the Council will resist development that would cause harm to the significance of a listed building through an effect on its setting, and resist development that causes harm to the character or appearance of conservation areas.

3.4 The proposed telecommunications equipment is considered to cause harm to the character and appearance of the Bloomsbury Conservation Area and host building due to the prominence of the antennas which would be visible above the parapet of the roof, where they would be highly noticeable against the skyline and clearly visible from public views close-by and from longer views. Of particular concern is the proposed installation of equipment fronting High Holborn mounted on a monopole. The height of the proposed equipment fronting High Holborn would be approximately 3m above the roofline. It is acknowledged that the scheme has been revised since the last refused one and somewhat reduced in scope, in that it now has only one antenna on a monopole at the front rather than 2 antennas sharing a pole. However this does not make a significant difference in visual impact. The antenna and pole would introduce an incongruous addition and this equipment would add visual clutter to the existing 'clean' roofscape of the property whereby the existing roofline of the block is currently uncluttered by any visible rooftop paraphernalia.

3.5 Telecommunications equipment by the nature of the standardised design style and aesthetic may not blend seamlessly with an existing building; however it is considered that the location, scale, height and design of the proposed equipment would be harmful to the character and appearance of the host

building, local views and the character and appearance of the adjacent conservation area.

3.6 The proposed installation is for an entirely new development, as opposed to adding to an existing installation. It would appear that little consideration has been made to enhance the host building or adjacent conservation area, by siting the apparatus sympathetically or proposing any sort of camouflage or screening which may have softened the appearance from street level, nor setting the antennas away from the front elevation in accordance with Section 10 (Telecommunications) of the NPPF 2019.

3.7 It is considered that the location, scale, height and design of the proposed equipment would be harmful to the character and appearance of the host building, local views, the character and appearance of the adjacent Bloomsbury conservation area and the setting of nearby listed buildings.

4.0 Planning balance:

4.1 Considerable importance and weight has been attached to any harm to designated heritage assets, and special attention has been paid to the desirability of preserving or enhancing the character and appearance of the adjacent Bloomsbury Conservation Area in particular, under s.72 of the Listed Buildings and Conservation Areas Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013.

4.2 Local Plan Policy D1, 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.

4.3 Given the assessment as outlined above, it is considered that the proposed telecommunications equipment would result in 'less than substantial' harm to the character and appearance of the Bloomsbury 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 Section 16 of the NPPF (2019) which seeks to preserve heritage assets.

4.4 The proposal would therefore fail to accord with policies D1 and D2 of the Camden Local Plan 2017. The development would create overly dominant visual clutter on a prominent roofscape, causing harm to the host building, local views from the street and to the character and appearance of the Bloomsbury Conservation Area and nearby listed buildings.

5.0 Recommendation:

5.1 Approval Required – Approval refused, on grounds of unacceptable location, scale, height and design.