

Delegated Report		Analysis sheet	Expiry Date:	17/12/2020
		N/A / attached	Consultation Expiry Date:	05/12/2020
Officer			Application Number(s)	
Matthew Dempsey			2020/4916/P	
Application Address			Drawing Numbers	
145 - 147 York Way London N7 9LG			Site Location Plan 100 A, 200 A, 202 B, 300 A, 302 B. General Background Information for Telecommunications Development, Cornerstone Consultation Plan, Supplementary Information, Developer Notice (16/10/2020), Declaration of Conformity with ICNIRP Public Exposure Guidelines (23/10/2020).	
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature	
Proposal(s)				
Installation of five antennas and two dishes on three tripod support poles, and installation of six replacement antennas and two dishes on three stand-off brackets. Ancillary equipment mounted inside of parapet wall.				
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. of responses	01	No. of objections	01
Summary of consultation responses:	<p>A site notice was displayed from 11/11/2020 and expired 05/12/2020.</p> <p>One objection was received during public consultation. The objection raised concerns about the level of detail provided within the application, specifically noting the lack of NW and SW elevations. They were also concerned about the impacts on adjacent conservation areas.</p>			
CAAC/Local groups* comments: <small>*Please Specify</small>	n/a			

Site Description

The proposed host property is a six storey brick built building in use as a self-storage facility situated on the western side of York Way opposite the Bridge Primary School, and near to the corner of Cliff Road, backing on to Cliff Villas, near to Brecknock Primary School and close to the borough boundary with Islington.

The property is not nationally listed or within a conservation area, however it is adjacent to the Camden Square Conservation Area in the borough of Camden, and opposite the Hillmarton Conservation Area in the borough of Islington. There are also several (Camden) locally listed buildings neighbouring or in close proximity of the site, namely; 115-123 York Way, 135 York Way, 151-153 (odd) York Way, and 5 & 6 Cliff Villas.

Relevant History

PE9900781 - A determination as to whether prior approval is required for the siting and appearance of pole-mounted panel antennae, equipment cabin and ancillary structures, as shown on drawing numbers 01 to 03. **Agreed in default 08/02/2000.**

2010/3962/P - Installation of two replacement telecommunications antennas, one equipment cabinet and associated ancillary development at roof level. **Granted 20/09/2010.**

2011/4745/P - Installation of 3 antennas, 7 transmission dishes and 2 equipment enclosures to roof and associated works. **Granted 07/11/2011.**

Pre-app information:

2018/6115/INVALID - Proposed upgrade works at telecommunications base station. **Withdrawn (fee due) 14/06/2019.**

2019/3791/NEW - Removal and replacement of 3No antennas, installation of 6 new antennas, installation of 2No 0.6mm & 2No 0.3mm microwave dishes, The removal, replacement and installation of ancillary equipment. **Withdrawn (fee due) 12/08/2019.**

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)

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 telecommunication equipment.

1.2 In this instance, Prior Approval is sought to install new telecommunications equipment on the existing rooftop area of the subject building. The proposed works would comprise the installation of five new Vodafone antennas, one 0.3m dish and one 0.6m dish on three new tripod support poles. Vodafone ancillary equipment is proposed to be mounted to the inside of the parapet wall at new antenna locations. In addition to this would be the removal of six existing Telefónica antennas and installation of six new Telefónica replacement antennas on three new stand-off brackets, with one 0.3m and one 0.6m Telefónica dishes to be installed below antennas. Telefónica ancillary equipment is proposed to be mounted on rails on new poles mounted to the inside of the parapet wall at antenna locations;

1.3 Beginning with the northern corner of the site and working clockwise around the roof, the specific installations proposed along the York Way frontage (north-east side) are:

- Two antennas on new stand-off brackets with climbing fall arrest system.
- Localised edge protection system.
- Five Remote Radio Heads (RRHs) mounted to inside of parapet wall.
- Cable trays.
- Five ERS units mounted inside of parapet wall.
- Two antennas and one 0.3m dish with climbing fall arrest system.
- Two antennas on new stand-off bracket on new tripod.
- Five RRHs mounted inside of parapet wall.

1.4 There are no proposed installations to the south-east side, however existing installation shall remain in place here.

1.5 The specific installations proposed to the south-west side are:

- Two antennas on new stand-off brackets with one 0.3m dish and one 0.6m dish with climbing fall arrest system.
- Localised edge protection system.
- Five RRHs mounted to inside of parapet wall.
- Cable trays.
- The roof plans also annotate a "Future VF Sector 2" installation to the south-west side which appears to be another pole mounted antenna, however this is not clear on the drawing or clarified anywhere else within supporting documents.

1.6 The specific installations proposed to the north-west side are:

- Two antennas and one 0.6m dish on new tripod with climbing fall arrest system.
- Localised edge protection system.
- Five ERS Units mounted to inside of parapet wall.
- Cable trays.

1.7 The specific installations proposed to be located more centrally on the roof top are:

- Telefonica and Vodafone GPS modules mounted to existing equipment cabin.

1.8 The existing main roof level of the host building is approximately 20m above ground level. There

are existing roof top additions in place, with existing antennas achieving a maximum height of approximately 23m. Following the proposed development, the maximum height of roof top installations would be approximately 26m.

2.0 Justification:

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

2.2 The applicant has confirmed that that they have not explored alternative development sites within the vicinity of the proposed site location or carried out consultation with local schools, this is due to there being existing telecoms equipment in place at this site.

2.4 The applicant has indicated that prior to the submission of this application a pre-application consultation was undertaken with the local planning authority; however, as confirmed by the site planning history above, pre-app advice was not provided by the local planning authority due to lack of fee payment forthcoming.

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 knowingly 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 site is located in a prominent position at the junction of York Way and Cliff Road. The host building is a well designed, well-proportioned local structure which contributes to the character of the street scene and surrounding roofscape.

3.2 The highest elements of the roof can be appreciated in views from various locations, including both directions along York Way, from the Cliff Road and Cliff Villas to the rear.

3.3 Although the site is not within a conservation area itself, its position is such that it is adjacent to the Camden Square Conservation Area which lies to the west of the site. Furthermore, there are several (Camden) locally listed structures in close proximity to the blocks, specifically 115-123 York Way, 135 York Way , 151-153 (odd) York Way, and 5 & 6 Cliff Villas. The Hillmarton Conservation Area (Islington) is to the east of the site.

3.4 A screen shot of the street view from York Way facing north demonstrates the prominence of the roof scape of the host building from the front, as below:



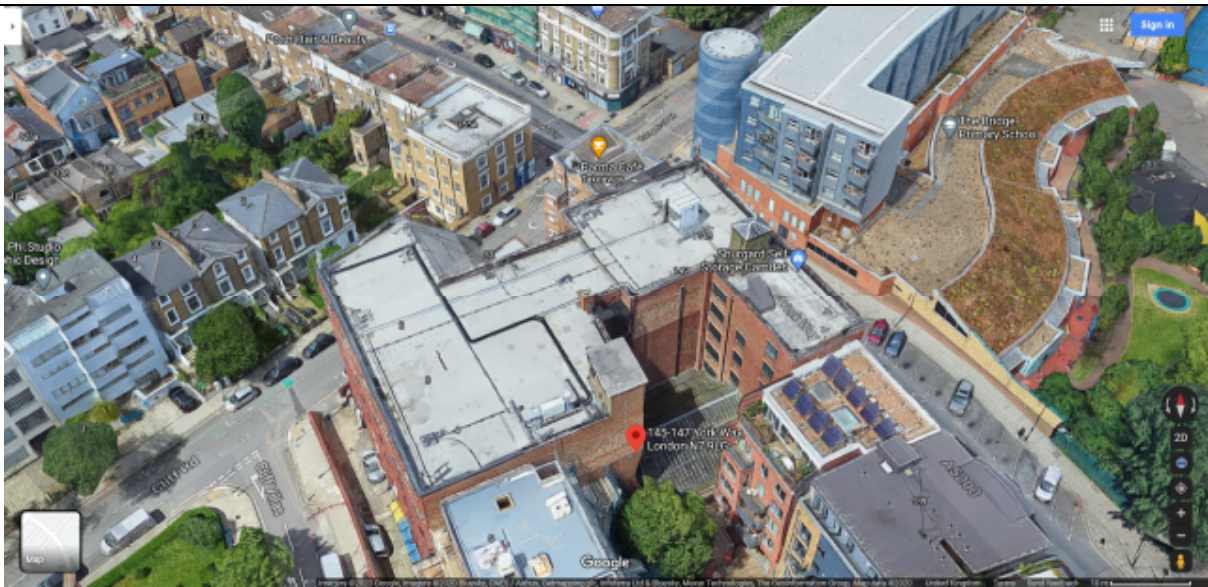
Note: Although there is a slightly irregular roofline along this terrace, there is a generally consistent rhythm to the overall roof scape, with the existing host building (red brick) being the tallest. Existing telecoms installations are visible at the parapet corners.

3.5 A sample of the street view from Cliff Road at the rear of the site can be seen below:



Note: The host building is the red brick block in the centre with some visible existing telecoms installation in place at the parapet corners. As annotated on the proposed roof plan 202 B, replacement antennas would be 0.5m higher than the existing installations visible in the image above, and additional proposed installations would sit approximately 3m higher than any existing telecoms equipment.

3.6 A 3D view of the roof scape can be seen below:



Note: There are four existing structures on the roof top. These are an access opening, an equipment cabin and two brick structures. Proposed GPS modules would be attached to the highest of these (near to the York Way frontage) at approximately 26m above the ground level, 6m above the main roof.

3.6 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 views into and out of the character or appearance of conservation areas. Camden Planning Guidance on Digital Infrastructure states that; the Council will support the expansion of electronic communications networks, including telecommunications and high speed broadband, however, the CPG also states; the Council will aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum, and that; equipment should be sympathetically designed and appropriately camouflaged.

3.7 It must be noted that there is a lack of detail provided showing views from the rear or side elevations making full assessment of the impact on the Camden Square Conservation Area difficult. Given that in this scheme installations are proposed at front, side and rear of site it would have been beneficial to have received adequate information including existing and proposed elevations from all sides in order to make a thorough assessment.

3.8 Discussion with Conservation Officers highlighted the lack of detail provided within the application. Officers also had concerns about the harmful impact on the Camden Square conservation area immediately adjacent to the southwest, for which an elevation is not provided

3.9 Telecommunications equipment by the nature of the standardised design style and aesthetic may not blend seamlessly with an existing building; however in this instance, it is considered that the location, scale, height and design of the additional proposed equipment would be harmful to the character and appearance of the host building, local views and the adjacent Camden Square Conservation Area from Cliff Road. While it is acknowledged that existing antennas are in place on the roof top, the proposed installations would be taller, of greater number and subsequently resulting in a more harmful and unacceptable impact compared to the existing situation. The new antenna to the rear on the south-west elevation in particular would disrupt the clean parapet line and views of the sky from the rear to the detriment of the Camden Square Conservation Area.

3.10 Although the proposed installation would be 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 main elevations, in accordance with Section 10 (Telecommunications) of the NPPF 2019 and the CPG on digital infrastructure referred to above.

3.11 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 views from the adjacent Camden Square Conservation Area.

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 Camden Square 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, 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 in sections 1-3 of this report, it is considered that the proposed telecommunications equipment would result in 'less than substantial' harm to the character and appearance of the Camden Square 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 roof scape, causing harm to the host building, local views from the street and to the character and appearance of the Camden Square Conservation Area.

5.0 Recommendation:

5.1 Prior Approval Required and Prior Approval Refused, on grounds of its detrimental impact on the character and appearance of the host building in terms of both siting and appearance; unacceptable location, scale, height and design; and the dominant visual clutter resulting in a harmful impact to local views and the adjacent conservation area.