Delegated Re		port ^A	Analysis sheet		Expiry Date:	27/11/2020			
		Ν	I/A		Consultation Expiry Date:	29/11/2020			
Officer				Application Nu	umber(s)				
Tony Young				2020/4559/P	4559/P				
Application Address				Drawing Numbers					
Haddo House Highgate Road London NW5 1PX				Refer to draft decision notice					
PO 3/4	Area Tea	m Signature	C&UD	Authorised Officer Signature					
Proposal(s)									
Installation of telecommunications equipment on rooftop comprising 3 x antennas on poles, 3 x cabinets and ancillary works, including 1 x meter cabinet at ground level.									
Recommendation(s):		Refuse planning permission							
Application Type:		Full Planning Permission							

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice								
Informatives:									
Consultations									
Adjoining Occupiers & local groups	No. notified	0	No. of responses	95	No. of objections	95			
	Site notices (x3) were displayed from 29/10/2020 to 22/11/2020 A press notice was published from 05/11/2020 to 29/11/2020								
Summary of consultation responses from local residents, CAAC/local groups, etc	 <u>95 objections we</u> Occupier: Grove Te Road, Gla Dartmout Councillo Dartmout Highgate Lissendea Grove Te <u>The main conce</u> Antennae from the of Park Con buildings, Proposed views from Conserva Public be Alternativ The prop (2020/14) No consult Health art to 5G tec Potential associate No inform provider a <u>Officer response</u> In regard associate No inform proposals activity of appropria In regard In regard that does applicatio <u>For all oth</u> body of the 	ere rec s/tenar erace, enhurs h Park r Siân h Park Road n Gard rrace A marace A rrace A race A raco	eived from local resid hts/owners of Haddo F Lissenden Gardens, F t Avenue, Chetwynd F Hill; Berry (Highgate Ward Conservation Area A Estate Tenants & Res ens Tenants Associat Association. Sed are summarised a abinets will result in v ter and appearance o ion and Neighbourhoo ment would intrude of ament Hill and within rea; f equipment overstate locations are available fre very similar to thos and should therefore b by applicant for this c e impacts of telecomr y on local people and i-social behaviour and graffiti and enhanced on potential financial be by council. -social behaviour and graffiti and enhanced on potential financial be by applicant for this c e council. -social behaviour and graffiti and enhanced on potential financial be b applicant for this c potential financial benefit in part of the planning <u>acerns raised</u> , please ort.	ents ar House, Highga Road, I Road, I Road, I Road, I Solution; as follo isual cl f Hadd od Area the Da d; e; se rece se refus f Hadd od Area himpol the Da d; e; se rece f Hadd of Area health roof to penefits f health roof to penefits s assou consid see Se	Ad groups, including Clanfield and Wheat the Road, Gordon Ho Dartmouth Park Road (Committee; Association; ws: Jutter which would du to House, the Dartmo as, and nearby listed that locally protected rtmouth Park ntly refused in May sed for the same read application as claim tions masts and exp onment; to a safety issues op access; to telecommunication by access, the application ould be reported to the portunities for this to ould be reported to the portunities for this to ould be reported to the patted; ciated with the properties for this and the properties actions 3-6 below in the properties actions 3-6 below in the properties actions 3-6 below in the properties and the properties actions 3-6 below in the properties and the properties actions 3-6 below in the properties action for this action in the properties action for the properties	etract outh d 2020 asons; ed; osure ions ions cation ype of he osals, main			

Site Description

The application site is a large modernist residential block of flats, known as Haddo House, located on the western side of Highgate Road. The building forms part of a residential housing scheme built on the sites of Haddo House and Gordon House. Begun in 1965, and designed by Robert Bailie, it consists of a 7-storey block with 2 tall front facing service towers that is the subject of this application, as well as, 2-storey blocks at the rear and a terrace of houses facing Glenhurst Avenue.

The application site is bounded by Glenhurst Avenue to the north-west, Highgate Road to the northeast, and Gordon House Road to the south-east. The building and site is surrounded by mainly residential properties and a number of green public open spaces with a small terrace of ground floor retail and commercial uses to the south-east in Highgate Road.

The application site is located within the Dartmouth Park Neighbourhood and Conservation Areas. The host building is identified in the Dartmouth Park Conservation Area Appraisal and Management Statement (adopted in January 2009) as making a positive contribution to the Conservation Area. The building is also positioned within a locally protected view (see Paragraph 4.14 below for further details), identified as being significant within both the Dartmouth Park Conservation Area Appraisal and Management Statement Statement and the Neighbourhood Plan.

The building isn't listed; however, it is located within close proximity to several listed buildings, including a terrace of houses at nos.1-27 Grove Terrace (Grade II* and II) and Grove End House, no.150 Highgate Road (Grade II) to the north-east; no.175 Highgate Road to the north-west; nos. 1, 1A, 2 and 3, Wesleyan Place (Grade II), nos. 2-8 Little Green Street (Grade II) and Southampton House, no.137 Highgate Road (Grade II) to the south-east.

Relevant History

2020/1456/P - Installation of telecommunications equipment on rooftop comprising 3 antennas on poles, 3 cabinets and ancillary works, plus 1 meter cabinet at ground level. <u>Prior approval refused</u> <u>14/05/2020</u>. [*Reason for refusal: by reason of their location, number, height and design, would result in visual clutter which would cause harm to the character and appearance of the host property, local views and the Dartmouth Park Conservation Area, contrary to policies]*

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). <u>Planning permission granted 10/01/2012</u>

2011/4762/P - Installation of 1 x BT equipment cabinet (pavement). Prior approval given 14/11/2011

2011/0661/P - Retention of 1 x BT equipment cabinet (pavement). Prior approval given 04/04/2011

04/04/2011 - Installation of 1 X BT equipment cabinet (pavement). Prior approval given 04/04/2011

Relevant policies

National Planning Policy Framework 2019

Sections 6 (Building a strong, competitive economy), 10 (Supporting high quality communications), 12 (Achieving well-designed places) and 16 (Conserving and enhancing the historic environment)

London Plan 2020

Camden Local Plan 2017

- A1 Managing the impact of development
- A2 Open space
- D1 Design
- D2 Heritage
- E1 Economic development

Dartmouth Park Neighbourhood Plan 2020

- DC1 Enhancing the sense of place
- DC2 Heritage assets
- DC3 Requirement for good design
- ES1 Green and open spaces

Camden Planning Guidance

CPG Design (January 2021) - chapters 1 (Introduction), 2 (Design excellence), 3 (Heritage), 4 (Landscape and public realm), 7 (Designing safer environments) and Chapter 9 (Building services equipment)

CPG Amenity (January 2021) – chapters 1 (Introduction), 2 (Overlooking, privacy and outlook), 3 (Daylight and sunlight) and 6 (Noise and vibration)

CPG Digital infrastructure (March 2018) – Telecommunications equipment (paragraphs 11-15)

Dartmouth Park Conservation Area Appraisal & Management Statement (adopted Jan 2009) Parts 1 (Conservation area appraisal) and 2 (Management plan)

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

Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013

Assessment

- 1. Proposal
- 1.1 Planning permission is sought to installation telecommunications equipment on the rooftop comprising 3 x antennas on poles, 3 x cabinets and ancillary works, including 1 x meter cabinet at ground level.
- 1.2 This proposal involves the installation of telecommunication equipment on a new rooftop site to provide improved connectivity and network enhancement, including 5G coverage, to the surrounding area on behalf of established electronic communications operator, Telefónica UK Limited.
- 1.3 The host building consists of a variety of roof heights, which are mainly flat in nature and which accommodate a small number of TV aerials and satellite dishes. The rooftop is absent of any telecommunications equipment. The lower roof height is 20.34m above ground level, the upper or main roof height measures 23.05m above ground level with 2 existing flat topped turrets that rise to 25.19m above ground level.
- 1.4 The 3 x proposed antennas would located on the main roof and mounted on steel poles measuring approximately 2.8m in height. The antennas would rise up approximately 0.6m above the highest part of the turrets. The 3 x proposed equipment cabinets would be located towards the northern end of the lower roof which adjoins the main roof. 1 x proposed meter cabinet would also be installed adjacent to the base of the building at ground level on the north-west elevation. An associated cable tray and trunking would run from the cabinet to roof level, rising up the full height of the elevation.

2. Background

2.1 A GPDO Prior Approval application (2020/1456/P) for similar proposals was refused on 14/05/2020 for the following reason:

"The proposed telecom antennas and poles on the roof, by reason of their location, number, height and design, would result in visual clutter which would cause harm to the character and appearance of the host property, local views and the Dartmouth Park Conservation Area, contrary to policies D1 (Design), D2 (Heritage) and A2 (Open space) of the London Borough of Camden Local Plan 2017 and policies DC1 (Enhancing the sense of place), DC2 (Heritage assets) and DC3 (Requirement for good design) of the Dartmouth Park Neighbourhood Plan 2020."

- 2.2 The applicant has confirmed that the differences between the previously refused proposal and the current application are:
 - 1 x antenna (identified as A3 on the proposed roof plan drawing ref. 201 rev E and Photo 1 below) is positioned more centrally and slightly closer to the adjacent roof turret;
 - clarification of the benefits of 5G and an improved network;
 - inclusion of a Heritage Impact Assessment; and
 - inclusion of existing and proposed north-west, south-east and south-west elevation drawings.

3. Assessment

- 3.1 The principle considerations in the determination of this application are:
 - the design and impact of the proposals on the character and appearance of the host building, local views, Dartmouth Park Conservation Area, and within the settings of nearby listed buildings; and
 - the impact of the proposal on neighbouring amenity.

4. Design

- 4.1 Local Plan Policy D1 (Design) establishes that careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development in Camden which integrates into its surroundings. It advises that "Good design takes account of its surroundings and preserves what is distinctive and valued about the local area."
- 4.2 Local Plan Policy D2 (Heritage) also states that the Council will only permit development within conservation areas that preserve and enhance the character and appearance of the area, and will resist development that would cause harm to significance of a listed building through an effect on its setting. The Dartmouth Park Conservation Area Appraisal and Management Statement (adopted January 2009) supports this when stating that its designation as a conservation area, *"provides the basis for policies designed to preserve or enhance the special interest of such an area."*
- 4.3 Policies D1 and D2 are supported by Dartmouth Park Neighbourhood Plan Policies DC1 (Enhancing the sense of place), DC2 (Heritage assets) and DC3 (Requirement for good design), as well as, Camden Planning Guidance (CPG) Design and Digital Infrastructure. In particular, CPG Design in Chapter 9 (Building services equipment) recognises that design considerations within the setting of any listed buildings and conservation areas should include the visual impact of building services equipment on the host building within this context.
- 4.4 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. This is supported by Dartmouth Park Neighbourhood Plan Policy ES1 (Green and open spaces) which seeks to protect public open spaces and gardens, several of which are identified as being located in close proximity to the application site.
- 4.5 The National Planning Policy Framework (NPPF) in Paragraph 113 of Chapter 10 (Supporting high quality communications) requires Local Planning Authorities to keep the number of radio and electronic communications masts, and the sites for such installations to a minimum, consistent with the needs of consumers, the efficient operation of the network and to provide reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.

- 4.6 The applicant's supplementary information document states there is no opportunity to utilise an existing telecommunications site to meet the technical requirement for improved connectivity and network enhancement, and therefore, the proposal seeks to utilise the host building to meet this need on behalf of Telefónica UK Limited. It also argues that the design of the proposed equipment is considered to be the least visually intrusive option possible given the larger antenna sizes required for 5G coverage, and that this increased size and positioning would not detract from the building and character of the area in which the application site is located.
- 4.7 Although the host building isn't listed, it is certainly not without merit in terms of its character and appearance, it being widely considered to be a fine example of modern architecture and mid-1960s Council housing and development. The building is located within the Dartmouth Park Conservation and Neighbourhood Areas. The building itself is 7-storeys in height with a number of roof areas of various heights along its length, though all mainly flat in nature, and which accommodate a small number of TV aerials and satellite dishes. The rooftop is absent of any telecommunications equipment and has a relatively uncluttered roofscape.
- 4.8 The relevant roof areas most affected by the proposals are identified on Photo 1 below. The positions of the 3 x proposed antennas are also shown (identified as A1, A2 and A3 respectively).



<u>Photo 1</u> – aerial view showing relevant roof areas of building and antenna positions

- 4.9 The application site is a significantly taller building when compared to the surrounded buildings which comprise of mainly low level residential properties, the closest of which are situated along Gordon House Road, Highgate Road, Chetwynd Road, Grove Terrace, and Glenhurst Avenue. Indeed, the building's prominence in this context serves to emphasise the detailed design and massing of the modernist architecture, in particular the front facing glazed stair and service enclosures and rooftop water tanks and turrets which provide important and interesting features within the skyline.
- 4.10 Additionally, the presence of several green and open public spaces located in close proximity to and surrounding Haddo House (see Image 1 below) serve to further accentuate the building's height and prominence by virtue of their low bearing and spacious character. Many of these spaces are recognised in the Dartmouth Park Neighbourhood Plan as designated areas which Policy ES1 (Green and open spaces) seeks to protect (Area 2 Highgate enclosures and Grove Terrace squares; and Area 8 Haddo House open space).



Image 1 – local green and open public spaces

- 4.11 As a result of this contrast between the relative building heights and surrounding green spaces, as well as, the open and prominent corner location on the junction with Gordon House Road and Highgate Road, the roof of Haddo House is widely visible in short, medium and long range views from a variety of vantage points within the public realm, including the nearby Parliament Hill Fields and Hampstead Heath public park.
- 4.12 While it is acknowledged that it isn't uncommon for telecommunications equipment to be located appropriately on the rooftops of residential tower blocks, in this particular case, the proposed equipment would introduce conspicuous visual clutter to an otherwise relatively uncluttered roofscape given the site context. The most noticeable part of the proposals affecting the roof area involves the installation of 3 new antennas on support poles which would rise up to approximately 2.8m in height. In this regard, the proposals would result in unattractive and overly dominant additions to the roofscape, serving to disfigure the appearance of Haddo House and being highly visible in the skyline.
- 4.13 This would undermine the positive contribution the building makes to the local area, as identified in the Dartmouth Park Conservation Area Appraisal and Management Statement, and its status as an additional heritage asset as recognised in Appendix 2 of the Dartmouth Park Neighbourhood Plan which also offers protection under Policies DC1 (Enhancing the sense of place), DC2 (Heritage assets) and DC3 (Requirement for good design). As such, the proposal would cause unacceptable visual harm to the character and appearance of the host building, the settings of surrounding green and open spaces, as well as, the Dartmouth Park Conservation and Neighbourhood Areas, by virtue of their location, number, height and design.
- 4.14 Furthermore, in addition to the visibility of Haddo House from a variety of public vantage points, it is also noted that the host building is visible within a number of notable views, such as, one from Hampstead Heath (which is Metropolitan Open Land) and a view from Chetwynd Road down towards Highgate Road, with Haddo House at the centre (see photo 2 below) identified as protected under Policy DC1(a) of the Dartmouth Park Neighbourhood Plan (View 2). The proposed equipment would be highly noticeable against the skyline and intrude harmfully into both of these important local views.
- 4.15 The description in Appendix 1 (Protected views) of the Plan states that any development would be expected "not to intrude into the skyline created by the view of Haddo House or the Heath greenery." As an adopted Neighbourhood Plan, the policies are associated closely with the Camden Local Plan and have equal weight to Local Plan policies.



<u>Photo 2</u> – View 2: from Chetwynd Road down towards Highgate Road (with the rooftop and turrets of Haddo House highlighted in red)

- 4.16 While it is acknowledged that the host building is not listed, it is noted that it is located within close proximity to several listed buildings, including a terrace of houses at nos.1-27 Grove Terrace (Grade II* and II) and Grove End House, no.150 Highgate Road (Grade II) to the north-east; no.175 Highgate Road to the north-west; nos. 1, 1A, 2 and 3, Wesleyan Place (Grade II), nos. 2-8 Little Green Street (Grade II) and Southampton House, no.137 Highgate Road (Grade II) to the south-east. Local Plan 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.
- 4.17 However, given the site context, and in particular the significant distances between the location of the proposed equipment and nearest listed buildings, the proposal is considered unlikely to cause harm to the significance of the listed buildings through any effect on their settings.
- 4.18 In regard to the other proposed works, including the siting of cabinets, low level RRH units, handrails and cable trays on the rooftop, while it is considered that these would not cause any significant harm in visibility terms due to their modest size, low height and siting, the proposed layout would be inappropriate in terms of the proposed layout of the equipment. In particular, the proposed roof plan (drawing ref. 201 rev E) indicates that cable trays, rails and an access platform would be positioned on top of or pass over 4 existing skylights on the roof. In this regard, and as noted in a response from the Dartmouth Park Conservation Area Advisory Committee, the proposal shows a lack of consideration for the integrity of the original design of the host building, including the existing roof layout and access to natural light to internal spaces below. However, it is recognised that it may be possible to overcome the detrimental impact of the proposed arrangement in a revised layout which recognises and maintains the integrity of the existing roof layout under different circumstances where an approval might be possible.
- 4.19 At ground level, the proposals involve the siting of a cabinet at the base of the building on the north-west (side) elevation. This is not considered to be unduly harmful given its size and location; however, the associated cable tray and trunking would run from the cabinet to roof level, so rising up the full height of the elevation. Though the north-west elevation is prominent within the public realm, the proposal would unlikely be widely noticeable or harmful to the existing character and appearance of the building due to the slim nature of the trunking and the fact that its colour could be secured by condition attached to any approval to ensure that it blends in as closely as possible with the adjacent external facing material.

5. Planning balance

- 5.1 Considerable importance and weight has been attached to the desirability of preserving or enhancing the character or appearance of Dartmouth Park Conservation Area, and the settings of any listed buildings, under s.72 of the Planning (Listed Buildings and Conservation Areas Act 1990) as amended by the Enterprise and Regulatory Reform Act (ERR) 2013.
- 5.2 Local Plan Policies D1 and D2, consistent with Dartmouth Park Neighbourhood Plan Policies DC1, DC2 and DC3, and Chapter 16 (Conserving and enhancing the historic environment) of the NPPF which seeks to preserve and enhance heritage assets, state that the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.
- 5.3 Given the assessment as outlined above in Section 4 of this report, it is considered that the proposed telecommunications equipment would result in harm to the character, appearance and historic interest of the Dartmouth Park Conservation Area.
- 5.4 The NPPF states in Paragraphs 196 and 197 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 effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application."

5G system and public benefit

- 5.5 The supporting information recognises the high level of mobile phone use and ownership within the UK population and the overall acceptance of the benefits of mobile communications. The higher frequencies that the proposed 5G system uses would serve to provide additional public benefits through greater bandwidth and capacity, along with improved connectivity, network enhancement and speed. It is generally argued that local communities could directly benefit from the proposed new and improved connectivity through enhanced social interaction and inclusion, improved local economy and services, and higher productivity, amongst other benefits.
- 5.6 It is noted, however, that new 5G systems have a more complex radio requirement. Where previously 2G, 3G or 4G systems could be accommodated without the need for extra supporting structures or raising the antenna heights, 5G signals involve locating antennas closer to the building edge and with raised antenna heights to avoid the 'clipping' effect of building edges given that 5G signals are more prone to the shadowing effect of adjacent buildings or existing structures.
- 5.7 The applicant's supplementary information document confirms that though the proposals would require a new standalone facility on the rooftop of an existing building, it argues that the design of the proposed equipment is the least visually intrusive option available and the optimum location in terms of siting and design given the technical constraints of 5G systems as stated above and those of the site itself.

Planning balance

- 5.8 Weighing the less than substantial harm caused as a result of the proposed development against this demonstrable public benefit, it is considered on balance that the benefit to the public arising from enhancing the local telecommunication coverage and increased capacity would not outweigh the harm arising to the character and appearance of the host property, local views from the street and nearby public green spaces, and Dartmouth Park Conservation and Neighbourhood Areas.
- 5.9 Overall, therefore, and on balance, the proposed development does not accord with Chapter 16 of the NPPF which seeks to preserve and enhance heritage assets, and the proposal is considered on balance to be unacceptable in design terms.
- 6. Supplementary information

6.1 Chapter 10 (Supporting high quality communications) of the NPPF in Paragraph 115 requires that all applications for telecommunications development be supported by the necessary evidence to justify the proposed development. This should include:

a. the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and

b. for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or

c. for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

- 6.2 The applicant has provided supplementary information that identifies the nearest schools or nondomestic childcare institutions as Parliament Hill School (located approximately 205m away) and the Spanish Nursery (located approximately 207m away). The information confirms that preapplication consultation letters were sent to Parliament Hill School and the Spanish Nursery on 22/11/2019, as well as, to all Highgate Ward Councillors and 110 residential properties on Highgate Road, Gordon House Road and Glenhurst Avenue. The applicant confirmed that they received responses objecting to the proposals in regard to visual impact, conservation area, alternative locations, sound and health issues.
- 6.3 Pre-application consultation correspondence was also sent to the Council on 22/11/2019; however, the applicant declined to engage in the Council's pre-planning advice process as they considered the fee to be prohibitive.
- 6.4 It is noted that the consultation exercise referred to above was carried out in relation to proposals associated with an earlier GPDO Prior Approval application (2020/1456/P) which was subsequently refused on 14/05/2020. However, given that the current application proposals are sufficiently similar to the previous refused application as to be almost identical, and in view of the high level of local interest and awareness evidenced by the amount of responses received by the Council to the proposals, it is considered that opportunity for interested parties to view the proposals and provide their views has been adequately exercised.
- 6.5 The supplementary information confirms that the application site is not located within 3km of an aerodrome or airfield, and as such, the Civil Aviation Authority and Secretary of State have not been notified. The documentation also indicates that the applicant has identified and undertaken consideration of a number of alternative sites within the locality and that these were not chosen as being suitable for various reasons. As such, the application site was identified as being the most suitable location to fulfil the technical requirements of a new base station.

Public health

- 6.6 The supporting information for the application also includes an ICNIRP Declaration which certifies that the proposed equipment is designed to be fully compliant with the precautionary guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). This is an independent body of scientific experts established by the International Radiation Protection Association. As such, the equipment is not anticipated to have any direct impact on public health.
- 6.7 It is noted that a number of consultation responses have been received from local residents objecting to the proposed telecommunications equipment on public health grounds. Paragraph 116 of the NPPF states that local planning authorities must determine applications on planning grounds only and does not give scope for the local planning authority to determine health safeguards beyond compliance with ICNIRP guidelines.

6.8 Notwithstanding this, the Council notes various advice available on health issues which conclude that mobile phone base stations do not pose any health risks to people, including children. This advice includes amongst others, an independent report in 2012 by the Advisory Group on Non-Ionising Radiation (AGNIR) which concluded that there is no convincing evidence that exposure to radio frequency within the agreed guideline levels in UK causes health effects in adults and children.

7. Amenity

- 7.1 Local Plan Policy A1 (Managing the impact of development) seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered and by only granting permission to development that would not harm the amenity of communities, occupiers and neighbouring residents. This is supported by Camden Planning Guidance (Amenity) that requires the potential impact on the amenity of neighbouring properties to be fully considered and seeks for developments to be "designed to protect the privacy of both new and existing dwellings to a reasonable degree."
- 7.2 In regard to possible noise impacts, the submitted information confirms that no sound would be emitted from the proposed equipment. The cabinets would be securely fixed and any necessary measures would be taken to minimise any vibrations. There would be no impact on daylight, sunlight or outlook to neighbouring premises from the proposed development. Note also Paragraphs 6.6 6.8 above in regard to public health matters.
- 7.3 Overall, therefore, it is concluded that there would be no adverse impact on residential amenity or public safety issues for any neighbouring residential occupiers. As such, the proposal accords with the relevant provisions of the NPPF as required, Camden Local Plan Policy A1 and Camden Planning Guidance in this regard.

8. Recommendation

- 8.1 It is therefore recommended, on balance, that planning permission be refused for the following reason:
- 8.2 The proposed telecommunication antennas and support poles on the roof, by reason of their location, number, height and design, would result in visual clutter which would cause harm to the character and appearance of the host property, local views, and the Dartmouth Park Conservation and Neighbourhood Areas, contrary to policies D1 (Design), D2 (Heritage) and A2 (Open space) of the London Borough of Camden Local Plan 2017, and policies DC1 (Enhancing the sense of place), DC2 (Heritage assets), DC3 (Requirement for good design) and ES1 (Green and open spaces) of the Dartmouth Park Neighbourhood Plan 2020.