

<b>Application No:</b>	<b>Consultees Name:</b>	<b>Received:</b>	<b>Comment:</b>	<b>Response:</b>
2021/0485/P	Dr Roger Rear	02/03/2021 12:18:16	OBJ	Dear Mr Dempsey,

I write to you again as Secretary of the Tenants and Residents Association (TRA) for 236-244 Royal College Street, in order to state the TRA and residents' objections to the planning application 2021/0485/P, consisting of the proposed installation of mobile phone antennas, GRP enclosures and cabinets to the roof area of 242-244 Royal College Street.

To date our TRA have not received any communication from the applicant, Waldon, following our initial written response to their notification letter, nor to the TRA's subsequent planning application objection, which we find highly disappointing.

Waldon have not sought to engage with either our TRA or our residents to resolve the highlighted issues and their second planning application has not addressed any of our original concerns.

Our objections to the application are as follows:

- 1) The proposed site, Block 242-244, is scheduled to begin an extensive programme of Major Works beginning in the Summer of 2021 and likely completing in the Summer of 2022. This project includes complete replacement of the entire 'Bauder' roof as well as window replacements and communal area redecoration. We are extremely concerned that the proposed installation of the antennas and cabinets will add further complexity and delay to our Major Works programme which has been repetitively postponed from its inception in 2016. We would not accept any further delays brought about by lengthy regulatory applications for equipment deactivation prior to the Major works, nor any delays brought about as a result of simultaneous installation alongside the Major Works, for example from installation of antenna plinths to the roof structure. The Major Works team have recently confirmed that they were unaware of this planning application and as such no arrangement is in place between the Council and the applicant to coordinate such an installation.
- 2) The addition of GRP enclosures/screens to hide the antennas are an unwelcome addition to the original plans, due to the size and placement of these large structures. The newly submitted plans show the GRP enclosures are up to three times wider than the existing plant rooms and add an additional storey in height to the building, cluttering the skyline further and ruining the proportions and visual appeal of the block. In addition, the size of these structures will block views of the sky and reduce sunlight to our communal garden and the surrounding properties and gardens within the nearby conservation area.
- 3) We question the robustness and safety of the proposed GRP structures, in particular whether they are resistant to strong crosswinds that the roof area is susceptible to. We wish to know if Waldon have made an assessment of year round windspeeds at the proposed site and if these fall within acceptable safety margins for the GRP structures.
- 4) It remains unclear how electrical wiring for the antennas will be routed to ground level. The building currently has numerous external wires which are unsafe and unsightly, which will be tidied during the Major Works programme. We require clarification on how Waldon plans to ensure the safety and minimal visual impact of any wiring travelling internally or externally on the building. We also question whether the equipment will utilise a separate power supply from the block to minimise the risk of power disruption for residents in the event of equipment failure and also to ensure that the equipment power usage is appropriately billed to the

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operator and not to our residents via communal usage.

5) As previously stated, the roof area where the proposed antennas and cabinet are to be sited is insecure and subject to persistent antisocial and illegal behaviour. The building's front door is regularly accessed by non-residents using illegally obtained firemen's keys for this purpose. The roof area suffers from criminal damage to secure doors and TV/Satellite antennas, rough sleeping, graffiti, illegal roof parties, drug dealing/usage and theft. Secure resident-only access is not possible as the roof area is a fire escape route between blocks 242 and 244 and security proposals have been previously rejected by Council Officers on practicality and fire safety grounds. We are extremely concerned that the proposed antennas and cabinets will become an additional focus for vandalism, arson, criminal damage and theft, placing our residents at considerable risk. Waldon have provided no plans on how they intend to secure the installation site against potential illegal activity.

6) Our residents informally use the communal roof area for activities such as exercise, children's play, drying washing, sunbathing and smoking. We have not received any reassurances that our residents, and in particular children playing in close proximity to the antenna masts, will be prevented from coming to harm; for example from the risk of electrocution by equipment/wiring or exposure to higher than acceptable levels of radiofrequency emissions. We do not consider the presence of ICNIRP demarcation chains to be a robust enough measure to prevent young children from accessing the dangerous areas around the equipment.

7) Exact radio-emission calculations for the residents living under the proposed antenna installation locations have still not been provided, nor has there been clear explanation or reassurance about the potential risks.

8) We would insist that the only persons who should have access to the interior of the blocks, and therefore the roofs, are residents, the council, or contractors acting on behalf of the council or for the benefit of residents and who are accompanied by a council officer. This does not include private companies seeking to install or maintain what is in effect their own private property.

9) Following on from the Major works, our residents have expressed interest in a project to convert the roof area into a communal green space, in line with the GLA's living roofs policy; <https://www.london.gov.uk/sites/default/files/living-roofs.pdf>. Our TRA and residents remain unclear if the proposed application would restrict such a positive development and if so, how Waldon plan to mitigate against this.

10) It remains unclear whether the application for the antenna installation would be under temporary lease or on a permanent arrangement. We also seek clarification about whether any upgrades or extension of the antennas would be required. We are concerned that once antennas are in place this would set precedent for numerous further antenna installations, to the detriment of our residents and the local conservation area.

We remain extremely disappointed that a full consultation has not taken place with our TRA and residents, which would have provided an opportunity to discuss these issues prior to application. Waldon claim that there has been satisfactory engagement with our TRA and residents, however this is quite clearly not the case.

Yours Faithfully,