

Delegated Report		Analysis sheet		Expiry Date:	21/05/2021
		N/A		Consultation Expiry Date:	15/05/2021
Officer			Application Number(s)		
Matthew Dempsey			2021/1593/P		
Application Address			Drawing Numbers		
Pavement on West End Lane outside Bishopsdale House Kilburn Vale London NW6 4QX			Please refer to draft decision notice		
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature		
Proposal(s)					
Installation of 18m high telecoms mast with wrap around base cabinet & 3 x free standing cabinets to pavement.					
Recommendation(s):		Prior Approval Required. 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	10	No. of objections	10
Summary of consultation responses:	<p>A site notice was displayed 21/04/2021, which expired 15/05/2021.</p> <p>Ten local residents objected to the proposed installation. Their concerns can be summarised as follows:</p> <ul style="list-style-type: none"> • Lack of notification/ consultation from the applicant. • Overly dominant unwelcome addition to the street. • Scale and bulk of the installations. • Unwanted visual clutter to the street. • Potential for increased antisocial behaviour. • Health impacts of telecommunications technology. 					
CAAC/Local groups* comments: <small>*Please Specify</small>	N/a					

Site Description

The application site comprises of a section of public footway on the southern side of West End Lane, close to the junction with Kilburn Place, outside Bishopsdale House.

The site is located immediately adjacent to 2 West End Lane, which is a building identified on Camden's Local list as a non-designated heritage asset. The application site is not situated within a conservation area; however, it is located close to the boundaries of the Prior Road Conservation Areas to the east.

Existing street furniture to the public highway in the immediate vicinity of the proposed installation includes a 6m high street lamp positioned adjacent to the kerbside, and a single equipment cabinet positioned against the boundary of Bishopsdale House.

Relevant History

No relevant site specific history.

Other relevant local decisions:

Pavement on west side of Camden Street

2021/0790/P - Erection of 18m high telecommunications monopole with wraparound cabinet at base and 3 x equipment cabinets on the public footpath. **Prior Approval Refused 16/04/2021** – *Reasons for refusal:*

- *The proposed monopole and its associated cabinets, by reason of their design, size, height and location, would be overly dominant in the streetscene and create visual clutter, which would detract from the character and appearance of the streetscene and adjacent Jeffrey's Street Conservation Area, would cause harm to the openness and character of the locally listed public open space (Camden Gardens) and to the settings of the adjacent groups of Grade II listed buildings (nos. 162-168 Camden Street and nos. 55-63 Kentish Town Road), contrary to policies A2 (Open space), A3 (Biodiversity), D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.*
- *The proposed monopole and its associated cabinets, by virtue of their design, size and location, would create unnecessary street clutter and reduce the amount of useable footway, causing harm to highway safety and hindering pedestrian movement, contrary to policies A1 (Managing the impact of development), C6 (Access for all) and T1 (Prioritising walking, cycling and public transport) of the London Borough of Camden Local Plan 2017.*

Pavement to the side of 100 Kilburn High Road

2020/2943/P - Installation of telecommunications equipment comprising 1 x 20m high monopole antenna with cabinet at base; 3 x cabinets at ground level and associated ancillary works involving removal of street tree. **Prior Approval Refused 19/08/2020** – *Reasons for refusal:*

- *The proposed telecoms equipment, by reason of its height, size and location, would form an overdominant feature in the streetscene contributing to visual clutter which would be harmful to the character and appearance of the street scene of both Kilburn High Road and Birchington Road contrary to Policy D1 (Design) of the London Borough of Camden Local Plan 2017.*
- *The proposed monopole and cabinets, by reason of their size and location, would reduce the amount of useable footway and so would be harmful to highway safety and pedestrian movement, contrary to policies A1 (Managing the impact of development), C6 (Access for all) and T1 (Prioritising walking, cycling and public transport) of the London Borough of Camden Local Plan 2017.*

Footpath adjacent to car park Bartholomew Road, Kentish Town

2020/2836/P - Installation of telecommunications equipment comprising of 1x 20m Phase 8 monopole C/W wraparound cabinet at base and 3x cabinets at ground level. **Prior Approval Refused 19/08/2020** - *Reasons for refusal:*

- *The proposed monopole and associated cabinets, by reason of their design, size, height and location, would be overly bulky and dominant in the streetscene and would create excessive visual clutter which would be harmful to the character and appearance of the streetscene and the Bartholomew Estate Conservation Area, contrary to policies D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017.*
- *The proposed monopole and cabinets, by reason of their size and location, would reduce the amount of useable footway and so would be harmful to highway safety and pedestrian movement, contrary to policies A1 (Managing the impact of development), C6 (Access for all) and T1 (Prioritising walking, cycling and public transport) of the London Borough of Camden Local Plan 2017.*

Pavement outside No.176 Camden High Street, opposite No.201 Camden High Street

2020/2760/P - Erection of 20m high telecommunications monopole with 4 cabinets and ancillary works on pavement. **Prior Approval Refused 12/08/2020** - *Reasons for refusal:*

- *The proposed monopole and associated cabinets, by reason of their design, size, height and location, would be overly bulky and dominant in the streetscene, would create excessive visual clutter and would cause harm to the character and appearance of the neighbouring buildings, streetscene and the Camden Town Conservation Area, contrary to policies D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017.*
- *The proposed monopole and cabinets, by virtue of their size and location, would create unnecessary street clutter, would reduce the amount of useable footway, would cause harm to highway safety and would hinder pedestrian movement, contrary to policies A1 (Managing the impact of development), C6 (Access for all) and T1 (Prioritising walking, cycling and public transport) of the London Borough of Camden Local Plan 2017.*

Corner of Malden Road & Wellesley Place

2006/1809/P - Installation of radio base station comprising a 14 metre high slimline monopole fitted with 3 x 1.7m high antennas, radio equipment housing and ancillary development on public pavement. **Prior Approval Refused 02/06/2006** - *Reason for refusal:*

- *The proposed monopole and associated cabinets, by reason of their siting in the middle of the pavement and set apart from the nearest boundary structure would add to the visual clutter of street-based equipment to the detriment of the local streetscape, and would provide unacceptable hindrances to pedestrian movement contrary to policies EN1, EN13, TR21, PU1 and PU8 of the London Borough of Camden Unitary Development Plan 2000 and policies B1, B5, T3 and T12 of the London Borough of Camden Replacement Unitary Development Plan (Revised Deposit Draft) 2004, and advice contained within the Council's Supplementary Planning Guidance July 2002 (3.7 Telecommunications).*

2006/5063/P - Resubmission of 2006/1809/P amended for the installation of radio base station comprising a 14 metre high slimline monopole fitted with 3 x 1.7m high antennas, radio equipment housing and ancillary development on the footpath. **Prior Approval Refused 22/12/2006** - *Reasons for refusal:*

- *The proposed monopole and associated cabinets, by reason of their siting in the middle of the pavement and set apart from the nearest boundary structure would add to the visual clutter of street-based equipment to the detriment of the local streetscape, and would provide unacceptable hindrances to pedestrian movement contrary to policies B1 (general design principles), B5 (Telecommunications, T3 (Pedestrians and cycling) and T12 (Works affecting highways) of the London Borough of Camden Replacement Unitary Development Plan 2006, and advice contained within the Camden Planning Guidance 2006 (Telecommunications).*
- *The proposed 14m high telecommunications pole, by virtue of its height and its siting adjoining the Gospel Oak Open Space would be detrimental to the visual amenity of the streetscene and the character and appearance of the adjoining public open space contrary to policies B1 (general design principles), B5 (Telecommunications) and N2 (Protecting open space) of the London Borough of Camden Replacement Unitary Development Plan 2006 and advice contained in the Camden Planning Guidance 2006.*

Outside on the corner of 120 Parkway

2005/0806/P - The installation of telecommunications equipment consisting of a 12m high monopole, traffic sign and a single equipment cabinet on the pavement outside 120 Parkway. **Full Planning Permission Refused 22/04/2005** - *Reasons for refusal:*

- *The proposed development is unacceptable on the grounds of visual amenity. More specifically the proposed height and location of the telecommunications equipment would add to the visual clutter at this junction and as such would be detrimental to the character and appearance of three conservation areas. In this regard the proposal is contrary to policies EN1 General environmental protection and improvement, EN4 Providing safe and attractive public spaces, EN31 Character & appearance of conservation areas and PU8 Telecommunications of the London Borough of Camden UDP 2000.*
- *The proposed development is unacceptable on the grounds of pedestrian safety. More particularly the proposed development would result in obstacles on the footway, to the detriment of pedestrian movement. In this regard the proposal is contrary to Policy TR21 Pedestrians of the London Borough of Camden UDP 2000.*

Pavement on Batholomew Road, Junction with Oseney Crescent

2019/2420/P - Replacement of the existing 12.5m monopole with a new 12.5m monopole, the replacement of cabinet and ancillary works thereto. **Prior Approval Given 31/07/2019**

Centenary House, 96-98 Camden High Street

2018/6382/P - Removal of existing stub-monopole and 3 no. antennas, installation of a steel-frame supporting 12 no. antennas and 3 no. dishes screened by proposed GRP shroud, retention of 1 no. existing dish, removal of 2 no. existing cabinets and replacement with 10 no. proposed equipment cabinets and associated works. **Full Planning Permission Refused 11/12/2019** - *Reason for refusal:*

- *The proposed antennas, steel frame grid and associated equipment at roof level, by virtue of their siting, size and design, would result in a visually prominent and incongruous rooftop development which would harm the appearance and character of the host and adjacent buildings, local views, street scene and Camden Town Conservation Area, contrary to policies D1 and D2 of the London Borough of Camden Local Plan 2017.*

Talacre Community Sports Centre, Dalby Street

2016/2024/P - Replacement of one existing 12.5m floodlight with a 17.5m monopole to support replacement floodlight and telecommunications antennae for shared use by Vodafone and Telefonica, plus installation of 4 equipment cabinets on adjoining footpath, to provide 3G and 4G mobile electronic communication services. **Full Planning Permission Granted 13/07/2016.**

Pavement outside 242 Grafton Road

2004/1698/P - Installation of a 12m slim-line monopole and equipment cabinet situated on the pavement. **Prior Approval Refused 10/06/2004** - *Reason for refusal:*

- *The proposed mobile phone mast, by reason of its size, siting and location, would have an unacceptable impact on the outlook enjoyed from the adjacent residential premises at 242 Grafton Road contrary to EN1 (General environmental protection and improvement), EN19 (Amenity for occupiers and neighbours) and PU8 (Telecommunications) of the London Borough of Camden Unitary Development Plan 2000.*

2009/0820/P - Installation of a 10m high monopole containing telecommunications antennae and an ancillary equipment cabinet situated on the pavement. **Prior Approval Refused 30/03/2009** - *Reason for refusal:*

- *The proposed mast, by virtue of its height, design and siting in conjunction with other street furniture, would create additional visual clutter in the street and would be harmful to the character and appearance of the local townscape, contrary to policies B1 and B5 of the London Borough of Camden Replacement Unitary Development Plan 2006, and advice contained in the Camden Planning Guidance 2006.*

2009/2009/P - Installation of a 8m high monopole containing telecommunications antennae and an

ancillary equipment cabinet situated on the pavement. **Prior Approval Refused 09/06/2009** -
Reason for refusal:

- *The proposed mast, by virtue of its appearance and siting in conjunction with other street furniture, would create additional visual clutter in the street and would be harmful to the character and appearance of the local townscape, contrary to policies B1 and B5 of the London Borough of Camden Replacement Unitary Development Plan 2006, and to advice contained in the Camden Planning Guidance 2006 and Planning Policy Guidance 8 (Telecommunications).*

2009/5819/P - Installation of a 14.8m high replacement monopole containing telecommunications antennae and an ancillary equipment cabinet on the pavement. **Prior Approval Refused 29/01/2010 and Allowed at Appeal 20/09/2010.**

2014/2216/P - Replacement of 14.8m high telecommunications monopole with a relocated 15m high telecommunications monopole and 2x telecommunication cabinets on public footway. **Prior Approval Given 16/05/2014.**

2014/4536/P - Replacement of 14.8m high telecommunications monopole with a relocated 15m high telecommunications monopole and 2x telecommunication cabinets on public footway. **Prior Approval Given 06/10/2014.**

Relevant policies

Part 16, Schedule 2, of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) by the Town and Country Planning (General Permitted Development) (England) (Amendment) (No.2) Order 2016

National Planning Policy Framework 2019

London Plan 2021

Camden Local Plan 2017

A1 Managing the impact of development

A2 Open space

C6 Access for all

D1 Design

DM1 Delivery and monitoring

T1 Prioritising walking, cycling and public transport

Camden Planning Guidance

CPG Design 2021

CPG Amenity 2021

CPG Digital infrastructure 2018

CPG Transport 2021

CPG Public open space 2021

TfL's Pedestrian Comfort Guidance for London 2010

Camden Streetscape Design Manual

Inclusive Mobility 2005 – chapter 5 (Footways, footpaths and pedestrian areas)

Equality Act 2010

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

Assessment

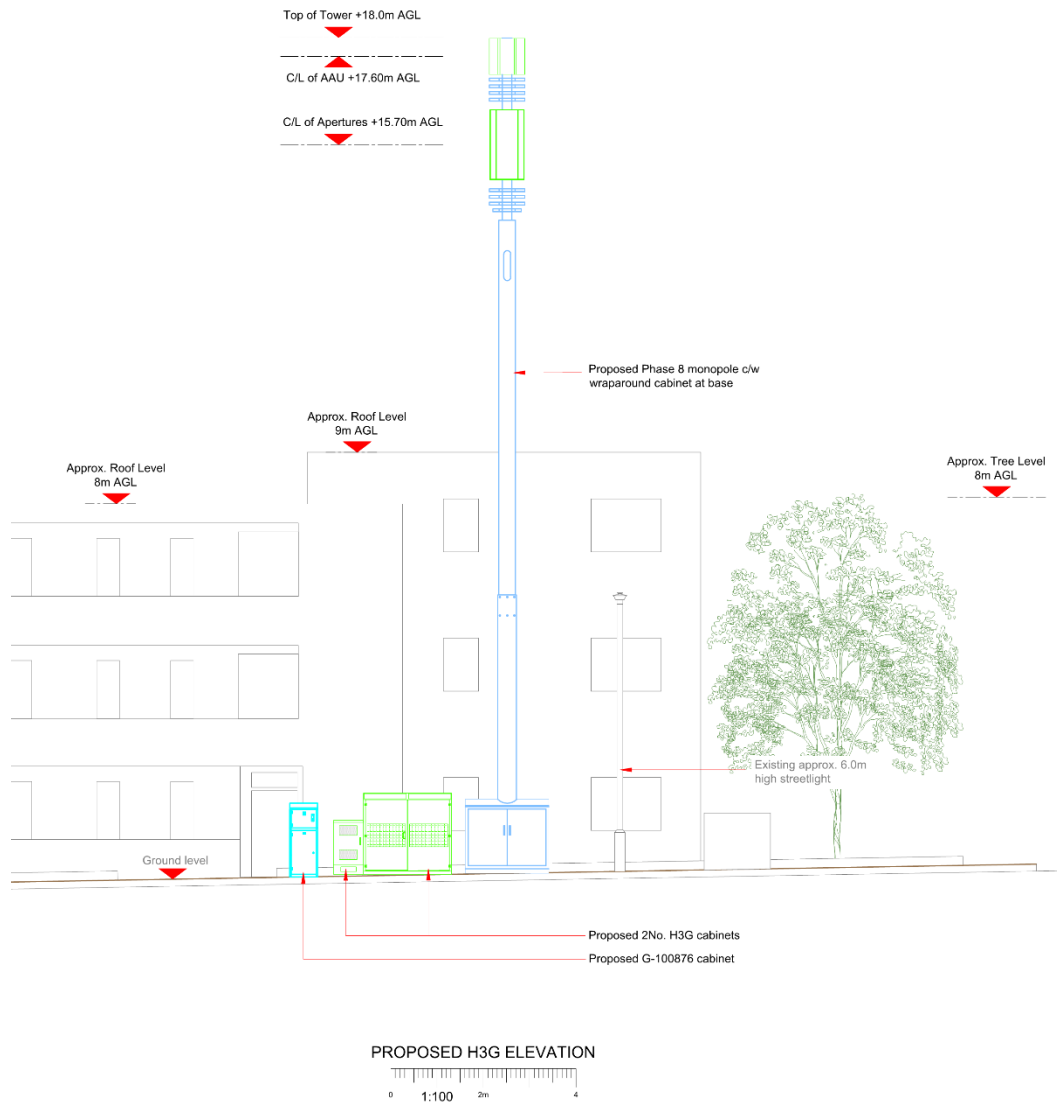
1.0 Proposal:

1.1 Confirmation is sought as to whether the erection of 18m high telecommunications mast with wraparound cabinet at base and three additional equipment cabinets on the public footpath would require prior approval under Part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order (GPDO) 2015 (as amended).

1.2 The 2015 Order permits the Council to only consider matters of siting and appearance in determining this type of application. As such, it is not possible for objections to be raised on any other grounds, such as, health impacts for instance.

1.3 The proposal includes the erection of an 18m mast for electronic communications purposes identified by the applicant as a 'Phase 8 Monopole' with wraparound cabinet at the base. Little detail of the composition of the monopole, wraparound cabinets, or; additional equipment cabinets, in terms of the specific equipment proposed to be housed within has been provided, however it is understood the proposed installation is required to upgrade mobile connectivity in relation to the provision of 5G services.

1.4 For clarification purposes, an image of the proposed elevation drawing is provided below (ref: 260 PROPOSED H3G ELEVATION [BRT13677_M002 B]). The existing 6m street light is shown, along with the existing BT cabinet and part of Bishopsdale House in the background (grey).



1.5 The proposals include a wraparound cabinet at the base of the monopole and the installation of 3 other cabinets on the public footpath on the southern side of West End Lane.

1.6 The exact dimensions of the wraparound base station cabinet at the foot of the monopole have not been provided; however, the submitted drawings indicate that it would measure approximately 0.6m deep x 1.8m wide x 1.7m high (highlighted blue on the proposed drawing).

1.7 The other 3 cabinets would measure approximately 0.7m deep x 1.9m wide x 1.7m high, & 0.7m deep 0.6m wide x 1.2m high (2 No. cabinets highlighted green); and 0.6m deep x 0.6m wide x 1.5m high (1 No. cabinet highlighted turquoise).

1.8 All proposed equipment would be of steel material and grey in colour as specified in the applicant's site specific supplementary information page 8.

2.0 Assessment:

2.1 The main considerations in relation to this proposal are:

- Applicant's justification.
- Impact of siting and appearance.

3.0 Applicant's Justification:

3.1 The proposal is based on the principle of needing to meet the operational requirements of the mobile operator, H3G Ltd. The application seeks the installation of a new monopole mast in this location as well as a number of cabinets.

3.2 The supplementary information document states that the proposed new monopole and equipment is required to provide 5G coverage for H3G Ltd in order to improve service in the vicinity of the proposed site. The cell search areas for 5G are stated as being extremely constrained with a typical cell radius of approximately 50m and that it would not be feasible to site the monopole outside of this target locale. Existing base stations are not considered capable of supporting the necessary additional equipment and prospective 'in-fill' mast sites are judged to be extremely limited. As such, a 'street works' installation positioned on the public highway at the application site is considered by the applicant to be the best suited location.

3.3 The applicant states that this application is a re-submission of the recently refused scheme, application reference: 2020/2943/P, dated 19/08/2020, and suggest they have accounted for the reasons for refusal of the previous application by reducing the height of the proposed monopole from 20m to 18m; and that, they have moved the proposal from Kilburn High Road to West End Lane. The applicant goes on to state that the only viable option for the proposed installation has been put forwards here.

3.4 The applicant has declared that the proposed equipment would comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) standards on emission levels in accordance with government guidelines. Consequently, it is not anticipated that the proposal would have any direct impact on public health.

4.0 Impact of siting and appearance of the proposed installation:

4.1 Local Plan Policy D1 (Design) aims to ensure the highest design standards for developments. Policy D1 states that the Council will require all developments to be of the highest standard of design and to respect the character, setting, form and scale of neighbouring buildings, its contribution to the public realm, and its impact on wider views and vistas.

4.2 Local Plan Policy D2 (Heritage) states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings and locally listed heritage assets. The Council will resist development that would cause harm to the significance of a listed building through an effect on its setting, and will seek to protect non-designated heritage assets (including those identified on the Council's 'Local list').

4.3 Camden Planning Guidance CPG (Digital Infrastructure) states that "the Council will aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need for a new site has been demonstrated to the satisfaction of the Council. Where new sites are required, equipment should be sympathetically designed and appropriately camouflaged where possible." (Paragraph 13 – Telecommunications equipment). This is consistent with the guidance on electronic communications infrastructure as set out in Paragraphs 113 and 115 of the National Planning Policy Framework (NPPF).

4.4 The application site comprises of a section of public footway on the southern side of West End Lane, close to the junction with Kilburn Place, outside Bishopsdale House. The site is located immediately adjacent to 2 West End Lane, which is a building identified on Camden's Local list as a non-designated heritage asset. The application site is not situated within a conservation area; however, it is located close to the boundaries of the Prior Road Conservation Areas to the east. As such, the impact of the proposal on the designated and non-designated heritage assets and their settings is a material planning consideration. The existing pavement in immediate vicinity of the proposed installation, is relatively free of visual clutter as it includes a 6m high street lamp positioned

adjacent to the kerbside, and a single equipment cabinet positioned against the boundary of Bishopsdale House.

4.5 The proposed monopole would be significantly taller than the local context of existing buildings, street lamps and trees, with the added bulk of the wrap around cabinets plus the additional cabinets, the proposals would result in additional clutter on the pavement in this location. Given the corner site and gentle slope approaching Kilburn High Road along West End Lane, the proposed installation has a prominent position in the street scene with a backdrop of a locally listed building. With the incongruous nature of the proposed installation adjacent to the locally listed No.2 West End Lane, the poor design of proposed equipment is considered to negatively impact upon and harm the setting of the locally listed asset. The monopole with wraparound cabinet at its base and 3 equipment cabinets sited on the public footpath would impair views and harm the general appearance and character of this non-designated heritage asset.

4.11 It is noted that although the Priory Road Conservation Area is within close proximity of the site, the proposal would appear to have limited impact on the character of the Conservation Area, however; the applicant does not acknowledge the site's location adjacent to the locally listed building or provide evidence of any particular regard given to any of the designated heritage assets. As such, insufficient consideration has been given in the application submission to the harm that the proposal would cause within these settings.

4.10 Considerable importance and weight have been attached to the harm arising to both the nearby conservation area and setting of locally listed buildings, given the duty of the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area, and the settings of any listed buildings, under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).

4.6 Local Plan Policies D1 and D2 support uncluttered streetscapes which do not detract from the surrounding environment. Any intervention at street level for electronic communications equipment should harmonise with the underlying design ethos of the neighbouring buildings and street scene. The applicant considers the proposed design to be typical of street furniture found in urban locations and that all equipment would assimilate well into the street scene. The Council disagrees with this view. While it is accepted that electronic communications, by the nature of their functional design and aesthetic may not blend seamlessly in all environments, it is considered that the proposed structures, by virtue of their excessive size, number, scale and their prominent siting, would result in a proliferation of harmful visual clutter which would be unattractive and overly dominant on a section of footway along West End Lane.. It is considered that the equipment in terms of its siting, bulk and height has not been carefully considered and no attempt has been made to screen or conceal the equipment, nor evidence provided to indicate whether it could be placed more unobtrusively and appropriately elsewhere or on existing high buildings.

4.9 The proposals would therefore appear as an obtrusive piece of street furniture which would degrade the visual amenity of the area and add street clutter, harmful to the character and appearance of the street scene, which would cause harm to the character of the locally listed building.

4.12 Local Plan Policies D1 and D2, consistent with Chapter 16 (Conserving and enhancing the historic environment) of the National Planning Policy Framework (NPPF) which seek 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.

4.13 The National Planning Policy Framework (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.” The planning balanced applied in relation to this proposal is included below.

5G system and public benefit

4.14 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, educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home, as well as enjoying access to social, media and gaming for leisure time activities. No justification has been included to clarify the need for such extensive number of cabinets.

4.15 The applicant’s supplementary information document argues that though the proposals would require a new ‘street works’ installation at pavement level, 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.

Planning balance

4.16 It is clear from CPG Digital Infrastructure guidance and Paragraph 113 of the NPPF that existing buildings and structures should always be considered first. The Council considers it is always a preferable option for antennas and masts to be placed on the roof of an existing building to minimise street and visual clutter and that a new ground-based mast should be treated as a last resort option.

4.17 As highlighted in the ‘Applicant’s Justification’ section above, the applicant has failed to provide sufficient evidence to show adequate consideration of viable alternative site options. The technical need for a mast at the site has also not been substantiated with evidence. No specific details of the appearance of the proposed monopole or equipment cabinets have been provided, and it appears from the submission documents that there has been no attempt at sympathetic design or camouflage of the proposals into the surroundings. As such, the evidence provided to justify the need for and public benefit of the proposals is insufficient to meet the requirements of CPG Digital Infrastructure and the NPPF guidance.

4.18 Weighing the less than substantial harm caused as a result of the proposed development against any demonstrable public benefit, it is considered on balance, based on the information the Council has at this time, that the benefit to the public arising from enhancing the local electronic communications coverage and increased capacity would not outweigh the harm arising to the character and appearance of the street scene, and setting of the adjacent locally listed building (No.2 West End Lane).

4.19 Overall, 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 to be unacceptable in terms of its siting, design and appearance, as supported by Camden Local Plan policies.

Transport

4.20 Local Plan Policy C6 (Access for all) recognises that making sure that people can move through streets and places easily and safely is as important as making the buildings themselves accessible. It states that the Council will require all buildings and spaces to be designed to be fully accessible and promote equality of opportunity. In particular, the Council will expect improvements for all pedestrians including disabled people to ensure good quality access and circulation arrangements, including improvements to existing routes, surfaces and footways.

4.21 Policy D8 (Public Realm) of the London Plan states that 'Applications which seek to introduce unnecessary street furniture should normally be refused'.

4.22 CPG Transport (Pedestrian and cycle movement) in Paragraph 9.7 states that the Council expects developments to consider the movement of people in and around a site, and to include the following:

- Ensuring the safety of vulnerable road users, including children, elderly people and people with mobility difficulties, sight impairments, and other disabilities;
- Taking account of surrounding context and character of the area;
- Avoiding street clutter and minimising the risk of pedestrian routes being obstructed or narrowed, e.g. by footway parking or by unnecessary street furniture; and
- Having due regard to design guidance set out in the Camden Streetscape Design Manual, TfL's London Cycling Design Standards, TfL's Pedestrian Comfort Level Guidance, and TfL's Healthy Street Indicators.

4.23 Section 3.01 of Camden's Streetscape Design Manual requires a minimum unobstructed 'clear footway' width of 1.8m. Appendix B of Transport for London's (TfL) Pedestrian Comfort Guidance recommends a minimum footway width of 2m for the safe and comfortable movement of pedestrians in low flow streets where there is no street furniture.

4.24 The proposed monopole and associated cabinets would be located on a section of footway adjacent to Bishopsdale House on the southern side of West End Lane. The pedestrian pavement at this point has an existing street light and BT cabinet which results the narrowest pavement width along this stretch of approximately 2.8m. Due to the curbed nature of the pavement and existing green space adjacent to the proposed location outside Bishopsdale House, the proposed pole and associated cabinets would result in the footway width along this section to be reduced from 3.8m to 2.84m, which is accepted given the existing context. . As such, the proposed equipment is not considered to reduce the footway width to an unacceptable level which could not support pedestrian flow.

4.25 In line with CPG Transport, proposals should look at avoiding street clutter by unnecessary street furniture. The applicant's submission does not include a thorough justification for all elements proposed as part of this telecommunication system, and therefore, it is considered that these constitute unnecessary street clutter. Given the additional proposed street level installations, the proposal would introduce an additional hazard to pedestrian movement along this section of pavement by restricting the free flow of pedestrians and making it difficult for people with pushchairs or in wheelchairs to pass, especially less able bodied persons and those with visual impairments. Furthermore, it is noted that the proposed installation is not positioned adjacent to the existing BT cabinet which may have been preferable in terms of reducing the potential for hazards for people with impaired vision who can find it difficult to find their way past obstacles set out in a disorderly fashion.

4.27 The Council has a duty under the Equality Act 2010 to pay due regard to any potential discriminatory impacts of proposals in so far as they might result in disadvantage to less able bodied persons. However, overall, it is considered that whilst the proposed monopole and cabinets would result in additional unnecessary street clutter, with the potential of impacting those with visual impairments and less able bodied persons, due to the existing pavement width and their position, these would not significantly reduce the usable space on the public highway to warrant a reason for refusal.

Amenity

4.29 The applicant has declared that the proposed equipment would comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) standards on emission levels in

accordance with government guidelines. Consequently, it is not anticipated that the proposal would have any direct impact on public health. There are no properties within close proximity of the application site and so there would be no impact on residential amenity in terms of loss of light or outlook.

4.30 Due to the nature of the proposal it is not considered there would be any significant negative impact on neighbouring amenity in terms of loss of outlook, light or privacy.

5.0 Conclusion

5.1 The proposal would fail to accord with policies A1, C6, D1, D2 and T1 of the Camden Local Plan 2017, and Chapter 16 of the NPPF. The development would create overly dominant visual clutter on a prominent location and degrade the visual amenity of the area. As such, it would cause harm to the character and appearance of the street scene, and the setting of the adjacent locally listed building. It would also create unnecessary street clutter with the potential of impacting those with visual impairment and less able bodied persons.

6.0 Recommendation

6.1 Prior Approval is required and approval is refused, on the grounds of unacceptable siting and appearance for the following reasons:

6.2 The proposed telecoms mast and its associated cabinets, by reason of their design, size, number, height and location, would be overly dominant in the street scene and create visual clutter, which would detract from the character and appearance of the street and setting of locally listed heritage asset (No.2 West End Lane) and be contrary to policies A1 (Managing the impact of development), D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.