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**By email to [planning@camden.gov.uk](mailto:planning@camden.gov.uk) and [Matthew.Dempsey@camden.gov.uk](mailto:Matthew.Dempsey@camden.gov.uk) Cc:  
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**2 July 2021**

**For the attention of Matthew Dempsey**

**Application number 2020/4437/P seeking Planning Permission to develop  
telecommunications equipment at 25 Hampstead High Street, NW3 1QJ by Waldon  
Telecom Ltd on behalf of Cornerstone and Telefonica**

Dear Sirs,

As a Hampstead resident I set out below my objections to the above application for planning consent under the following main headings:

A) Inappropriate Design and Damage to Heritage( Policy D1 and D2)

B) Exaggeration of Public Benefits

C) Application not Following NPPF Guidelines

D) Health and Safety Concerns

A) Inappropriate Design and Damage to Heritage (against Camden Local Plan Policy D1 and D2 as well as Hampstead Neighbourhood Forum Policy DH1)

6.As the Council is well aware, the property is located in the Hampstead Conservation Area , a designated heritage asset, so that any development must respect the local context and keep with the historic character and appearance of the area.

The three proposed 5G masts/antennae are situated on the edge of the building on 3 sides and extend 2.7 metres above the current roof. There is also reference in the plans to several additional handrails. As is obvious from the designs submitted, they will be clearly visible

from Hampstead High St, Gayton Rd, and parts of Well Walk and Prince Arthur Rd and some properties in Spencer Walk.. This will damage the appearance and character of the immediate area, contrary to Policy D1 and D2 of the Camden Local Plan

7. In addition, the antennae and cabinets will have a detrimental impact on two particular Views designated by the Hampstead Neighbourhood Plan as "important and historic": Views 7 and 8 "toward clock tower from High St" and "down High St towards Rosslyn Hill".

#### B) Exaggeration of Public Benefits

8. Much is made by the applicant of the public benefits, particularly to local businesses, derived from improved wireless connections enabled by such proposed developments. Most of the referenced government policy documents discuss the benefits of improved telecommunications infrastructure in general, rather than mobile phone connectivity in particular. In reality, the main gain to local businesses from improved telecommunications infrastructure will come from the investments in fibre broadband connections currently being made by G.Network on many roads in the Hampstead area, not from speeding up mobile phone connections.

#### C) Application Process Not Following NPPF Guidelines or Code of Best Practice on Mobile Phone Network Development

9. There are several ways in which the applicant has not followed the recommended guidelines of either the National Planning Policy Framework (NPPF), par.115, or the Code of Best Practice par 7.5. Both require that applications for electronic communications development "should be supported by the necessary evidence to justify the proposed development. This should include ":

- outcome of consultation with local communities, in particular the nearby primary schools (New End, Hampstead Parochial and others) because of the recognized health risks to young children in particular. No such evidence has been provided. A pre-application "consultation letter" was sent in August 2020 but this only referred to "mobile telecommunications equipment" with no details so not surprisingly received no response.

- evidence that the applicant has explored other sites and reasons for rejection. The evidence for rejection given in section 5 of the "Supplementary Information" document is in some cases rather superficial, eg "25, Hampstead High St is in a better position.....and is sat lower ...". Moreover there is no reference to any review of commercial buildings such as the flat rooftop site above Hampstead Underground Station.

- evidence of a structural survey to show suitability of site to carry the considerable weight of the planned telecommunications equipment. According to the site selection process described in "Cornerstone General Background Information" attached to the application, such a structural analysis is required BEFORE a planning application is submitted. No such evidence is available.

#### D) Health and Safety Concerns

10. Whilst we recognize that the NPPF(par.116) requires that planning authorities should not “set health safeguards different from the International Commission Guidelines for public exposure”, it is worth noting that the 2020 ICNIRP guidelines refer to the need to react to “the development of technologies that utilise EMF frequencies greater than 6GHz,such as 5G, with new restrictions to better protect against excessive temperature rise in the body”.(Source: “Differences between ICNIRP(2020) and Previous Guidelines”, par.2.6 from ICNIRP.org)

For our own health and safety all residents need to have evidence that the proposals comply with the new 2020 ICNIRP guidelines , and in particular the limits of the public exclusion zones. This is required at the very least in order to be able to install safety barriers or signage. There is no indication of these on any of the plans submitted by the applicant.

Related to this, the Electronic Communications Code (Conditions and Restrictions) Regulations 2003 (par.3(3) (b) “requires an operator to minimise potential hazards posed by work carried out in installing the apparatus or by apparatus once installed.”. There are other regulations relevant to telecommunications sites on rooftops, eg The Work at Height Regulations 2016 and Control of Electromagnetic Fields at Work Regulations 2016. It is not clear that Waldon Telecom have taken these requirements into account in their plans because they make no reference to access risks or public exclusion zones, nor to any of the above legislation.

I thank you in advance for the consideration you will give to these points when making a decision on Waldon Telecom’s application.

Yours sincerely

A large black rectangular box redacting the signature of Arun Singh.

**ARUN SINGH**

A black rectangular box redacting contact information, likely a phone number or email address.