

HERITAGE IMPACT ASSESMENT

Introduction

This heritage impact assessment has been prepared to support a planning application for a proposed telecommunications installation at Haddo House, Highgate Road, Highgate, London, NW5 1PX (E: 528530, N: 185838).

This statement will consider the impact of the proposal on the setting of heritage assets that are located nearby to the site.

Application Proposal: The proposed development consists of the installation of 3no. antennas, 1no. 600mm dish, 1no. 300mm dish and 3no. equipment cabinets at rooftop level, 1no. meter cabinet at ground level and ancillary works thereto.

Application proposals are shown on the drawings and supplementary information enclosed with the planning application submission.

This proposal involves the installation of a new telecommunication site to provide new and improved 2G, 3G, 4G and 5G network coverage to the surrounding area for Telefonica. This proposal will fill a substantial coverage gap within the area of Highgate. Operators have obligations to meet customer demands for a continued and improved quality of service. The installation has been designed to minimise the visual impact to the surrounding area as much as possible.

The site and its relationship with nearby heritage assets

The application site is located on Haddo House, a seven-storey residential block, a site bounded by Glenhurst Avenue to the north-west, Highgate Road to the north-east and Gordon House Road to the south-east.

The building is set within an area which has high-level and dense patterns of residential development.

The roof of Haddo House is flat and measures 23.05 metres from ground level with two turrets to the northern and southern ends of the building measuring 25.19 metres from ground level. There is also 1.1-metre-high handrailing surrounding the entire upper roof edge measuring 24.15 metres from ground level. This rooftop does not currently accommodate any telecommunications equipment but does contain several TV aerials and satellite dishes.



Figure 1: Existing view of Haddo House from Gordon House Road looking North East.

The host building is located within the Dartmouth Park Conservation Area outlined in figure 2 below.

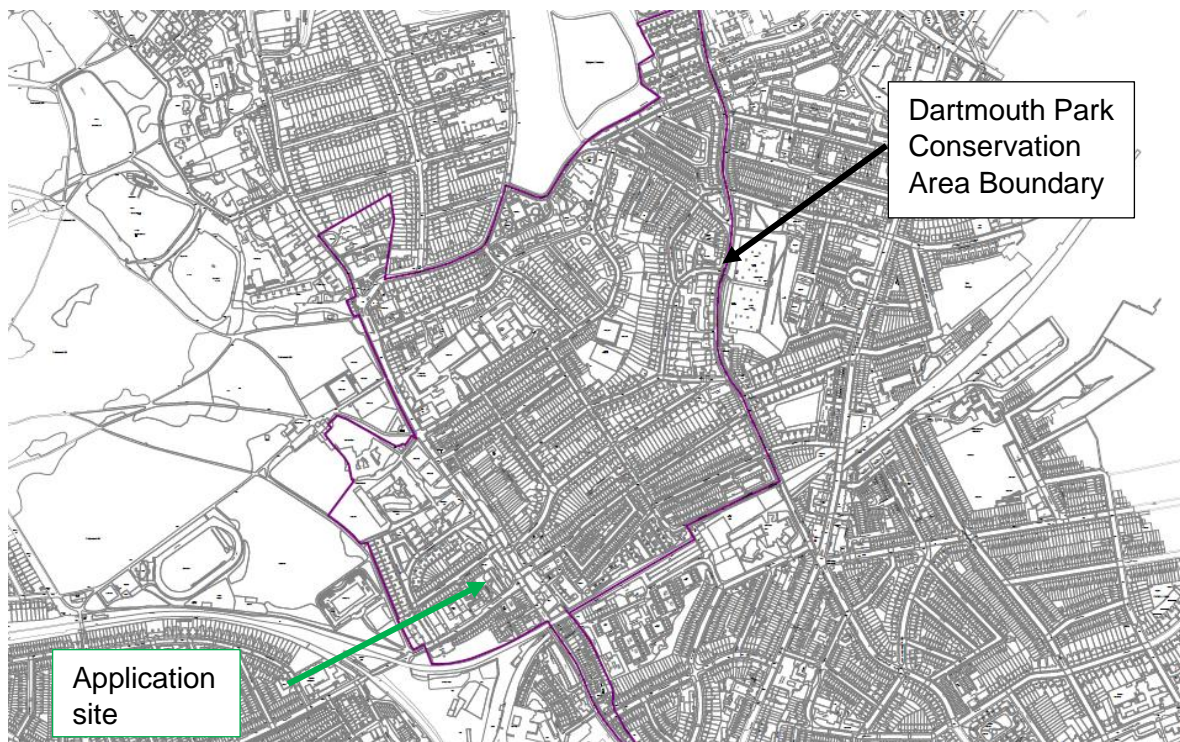


Figure 2: Dartmouth Park Conservation Area

Whilst the host building is not designated as a heritage asset, it is noted for its modernist design which contributes to the character of the conservation area. There are thirteen heritage assets located within the surrounding area. Due consideration has been given to any perceived significant harm caused to the character and appearance of the host building, local views or to nearby heritage assets, due to the proposed development.

The nearby heritage assets are as follows:

- a) 175 Highgate Road (List Entry Number: 1379011)
Heritage Category: Listed Building – Grade II
Date first listed: 14-May-1974
Approximate distance from Application Site: 66 metres northwest
- b) K2 Telephone Kiosk at Junction of Highgate Road (List Entry Number: 1379341)
Heritage Category: Listed Building – Grade II
Date first listed: 27-Feb-1987
Approximate distance from Application Site: 121 metres north
- c) Numbers 6 To 27 Grove Terrace and Attached Railings and Lamp Holders (List Entry Number: 1246374)
Heritage Category: Listed Building – Grade II*
Date first listed: 10-May-1954
Approximate distance from Application Site: 164 metres north
- d) Numbers 1 to 5 Grove Terrace and Attached Railings (List Entry Number: 1246373)
Heritage Category: Listed Building – Grade II
Date first listed: 10-May-1954
Approximate distance from Application Site: 102 metres northeast
- e) Grove End House (List Entry Number: 1379010)
Heritage Category: Listed Building – Grade II
Date first listed: 14-May-1974
Approximate distance from Application Site: 85.5 metres northeast
- f) 1, 1A, 2 and 3, Wesleyan Place (List Entry Number: 1379176)
Heritage Category: Listed Building – Grade II
Date first listed: 14-May-1974
Approximate distance from Application Site: 88 metres southeast
- g) 8 Little Green Street (List Entry Number: 1379345)
Heritage Category: Listed Building – Grade II
Date first listed: 14-May-1974
Approximate distance from Application Site: 187.7 metres southeast
- h) 4 - 7 Little Green Street (List Entry Number: 1379344)
Heritage Category: Listed Building – Grade II
Date first listed: 10-June-1954

Approximate distance from Application Site: 179.6 metres southeast

- i) 2 and 3 Little Green Street (List Entry Number: 1379343)
Heritage Category: Listed Building – Grade II
Date first listed: 14-May-1974
Approximate distance from Application Site: 179.6 metres southeast
- j) Fitzroy Terrace (List Entry Number: 1378944)
Heritage Category: Listed Building – Grade II
Date first listed: 11-Jan-1999
Approximate distance from Application Site: 258 metres southeast
- k) Southampton House (List Entry Number: 1378946)
Heritage Category: Listed Building – Grade II
Date first listed: 14-May-1974
Approximate distance from Application Site: 122 metres southeast
- l) Sewer Vent Pipe Approximately 45 Metres South East of Parliament Fields Lido
(List Entry Number: 1113026)
Heritage Category: Listed Building – Grade II
Date first listed: 11-Jan-1999
Approximate distance from Application Site: 220 metres southwest
- m) Parliament Hill Fields Lido (List Entry Number: 1113025)
Heritage Category: Listed Building – Grade II
Date first listed: 11-Jan-1999
Approximate distance from Application Site: 271 metres west

Paragraph 194 of the National Planning Policy Framework (NPPF) places an onus on those proposing changes to historic assets to include a clear description of the significance of the assets affected. It is noted that the requirement in the NPPF is that *'The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'*.

Conservation Area:

The Dartmouth Park Conservation Area Appraisal and Management Statement (adopted January 2009) reveals that the area has been classified as a designated area due to the special architectural and historic interest of this area.

The conservation area was designated on 4 February 1992. A section of Highgate Road was designated on 1 November 1985 as part of Highgate Village and was transferred to Dartmouth Park in 1992.

The area is made up of late 18th century terraces which contrast with contemporary housing estates, tiny cottages, large mansion blocks and Victorian villas, all existing together. The semi-rural quality of this area on the fringes of the Heath, is also an important aspect of the area.

The conservation area is a mainly residential area, but integral to its character are the interspersed uses scattered throughout it. There are small groups of workshops and offices in the southern tip, four large schools, several nurseries, small institutional buildings, four churches, four local shopping centres, a library, seven public houses, a community centre, a health centre and a recreational centre. It is an area of housing and is a part of Camden where there is little public open space.

The application site is located along Highgate road, a road that is considered to be of importance within the conservation area. It is one of the oldest streets in the area and has a mix of uses and building types. Unlike other parts of the conservation area there is more of a commercial feel to the area surrounding Highgate Road, due to the ground floor shops and other commercial activities. This leads to much more activity during the day and to a lesser extent in the evening.

The proposed installation will not hinder this Conservation area as installing telecoms apparatus on a rooftop allows the character of the area to remain the same as the equipment will not be directly visible from ground level. The building is not designated as listed according to Historic England and the surrounding Heath will not be adversely affected by visual impact.

Heritage Assets:

Figure 3, below, shows the relationship between the application site and the existing heritage assets within the local area.

The Historic England listings of the thirteen heritage assets in the wider area are summarised below:

a) 175 Highgate Road (List Entry Number: 1379011)

This early/mid-19th Century building is a detached house. It comprises two storeys and a basement of yellow stock brick with plain stucco 1st floor sill band. The roof is hipped slated with projecting bracketed eaves having bargeboards. The house is double fronted with 3 windows and late 19th Century stucco portico approached by steps. The doorway is round arched with patterned radial fanlight and double panelled doors.

b) K2 Telephone Kiosk at Junction of Highgate Road (List Entry Number: 1379341)

This telephone kiosk built in 1927 was designed by Giles Gilbert Scott. It comprises of cast-iron material. Shaped as a square kiosk of K2 type with domed roof, perforated crowns to top panel and glazing bars to windows and door.

c) Numbers 6 To 27 Grove Terrace and Attached Railings and Lamp Holders (List Entry Number: 1246374)

Listing comprises of a terrace of 22 houses. A combination of houses built between 1777 and 1824 of yellow stock and brown brick and rusticated stucco ground floors. Most houses have slate mansard roofs and dormers. Subsidiary features include

attached cast-iron railings with urn finials to areas and overthrow lamp-holders outside house no. 7-9, 11, 13 & 27.

d) Numbers 1 to 5 Grove Terrace and Attached Railings (List Entry Number: 1246373)

Listing comprises of a Terrace of 5 houses built in early 19th Century. They consist of yellow stock brick with rusticated stucco ground floors. They are 4 storeys with a basement and have 2 windows each, with Nos 1, 3 & 5 having projecting stucco porticoes. The doorways have pilaster jambs, cornice-heads, patterned fanlights and panelled doors. The attached cast-iron railings with spearhead finials to areas are also Listed.

e) Grove End House (List Entry Number: 1379010)

This early 19th Century detached house comprises of multi-coloured stock brick, is 3 storeys with a semi-basement. The house is double fronted with 5 windows, central 2 bays slightly projecting. It has a round-arched recessed doorway with radial fanlight and projecting wooden Ionic doorcase with panelled door approached by steps. The ground floor is gauged brick flat arches to recessed sashes and 1st floor with margin glazing. Later stucco surrounds to windows and doorways removed. The window to the rear of the house is a bow window.

f) 1, 1A, 2 and 3, Wesleyan Place (List Entry Number: 1379176)

A terrace of 4 houses built in early/mid-19th Century. Comprising of stucco with rusticated ground floor and pilasters rising through 1st floor to carrying entablature and blocking course. They have 2 storeys and 2 windows each, with round-arched ground floor openings. The doorways are panelled with fanlights. All except No.2 has intersecting tracery to ground floor sashes. The 1st floors have recessed sashes with cast-iron balconies of intersecting design and moulded panels above.

g) 8 Little Green Street (List Entry Number: 1379345)

An end of terrace house built in late 18th Century comprising of multi-coloured stock brick. It has 3 storeys, 2 windows and 2-window return to College Lane. The doorway is round-arched recessed with panelled door. The windows have cambered arches to recessed sashes except at ground floor level which have a flat arch; some are blind.

h) 4 - 7 Little Green Street (List Entry Number: 1379344)

These 4 terraced houses, formerly with shops were built in late 18th Century. The buildings are 2 storeys and attics. They each are built from yellow stock brick and brown brick, with slate mansard roofs and dormers. House no. 4 & 5 have one window each and no. 6 & 7 have 2 windows each. The doorways are square headed with overlights and panelled doors. House no. 5 has a 20th Century door. House no. 4 & 5 ground floors have canted bay windows on brackets with entablature having dentil cornice extending over doorways. House no. 6 & 7 ground floors have bowed windows on brackets with mutule cornices extending over doorways and supported on shaped brackets with guttae. The 1st floors have segmental-arched sashes and parapets.

i) 2 and 3 Little Green Street (List Entry Number: 1379343)

Formerly ground floor shops, these 3 terraced houses were built in late 18th Century. House no.2 Little Green Street incorporates the former no.1. They are built with multi-colour stock brick and have slate mansard roofs with dormers. They comprise of 2 storey (no. 2 & 3) and 3 storey (no. 1) buildings. House no. 1 has a gable wall to the street and 1 window, with 1 window return to Highgate Road. House no.2 has 1 window and house no.3 has 2 windows.

The doorways are square headed with overlights and panelled doors. House no.2 has 20th Century reproduction canted bay window, on a bracket, with entablature having dentil cornice extending over doorway; this to match no. 4 & 5 Little Green Street. House no.3 has recessed sash at ground floor level with concrete lintel extending over doorway. The first floors comprise of segmental-arched sashes and parapets.

j) Fitzroy Terrace (List Entry Number: 1378944)

These late 18th Century elegant terrace houses (6 in total) have been altered and repaired. Believed to have been built to house servants of the Fitzroy family. They are built with yellow stock brick with red brick dressings with a central name plaque. Comprising of 3 storeys and semi-basements, having 2 windows each except for no.98 which has 1 window. They have semi-basement openings mostly segmental-arched with doors mostly part-glazed. First floor windows have round-arched sashes with gauged red brick heads and intersecting tracery. The main entrances are formerly at this level. Windows on the 2nd and 3rd floor are gauged brick flat arches to recessed sashes. There is a strong parapet line with chimneys visible from the road.

k) Southampton House (List Entry Number: 1378946)

This former house is now divided into flats, built in the early 19th Century. It was restored and altered mid/late 20th Century. This is a double fronted three storey building with 3 windows. It is built of yellow stock brick with plain stucco and a 1st floor sill band. There is a Stucco plaque located centrally at 2nd floor level inscribed "Southampton House". During the early 19th Century, this was the Southampton House Academy run by Captain John Bickerstaffe.

l) Sewer Vent Pipe Approximately 45 Metres South East of Parliament Fields Lido

A cast iron sewer ventilation pipe from the 19th Century. Comprising of a rectangular plinth with fluted column, having beaded moulding at base and concentric moulding at top forming base of openwork lantern with gadrooned dome and finial. An unusual survival of this once common feature.

m) Parliament Hill Fields Lido (List Entry Number: 1113025)

This listing comprises of open-air swimming baths from 1937-1938. Built with patterned stock brick, flat roofs concealed behind parapets. Forming a rectangular plan, with entrance to south flanked by changing rooms, filtration plant to east and offices to west, all in a single-storey U-shaped building. This form continued as walls shielding sun-bathing terraces to north, set either side of single-storey cafe with curved

modern-style front. In the centre is the pool, 60m by 27m, with fountains or aerators to either side. All buildings with small metal windows, except for the cafe which has large glazed panels with horizontal metal glazing bars continued across double doors at centre. This building was included as the most sophisticated of the thirteen lidos constructed by the London County Council between 1909 and 1939. No other British city attempted so comprehensive a programme, and Parliament Hill Fields is considered the best representative example of the rectangular pools enclosed by high walls found in urban locations.

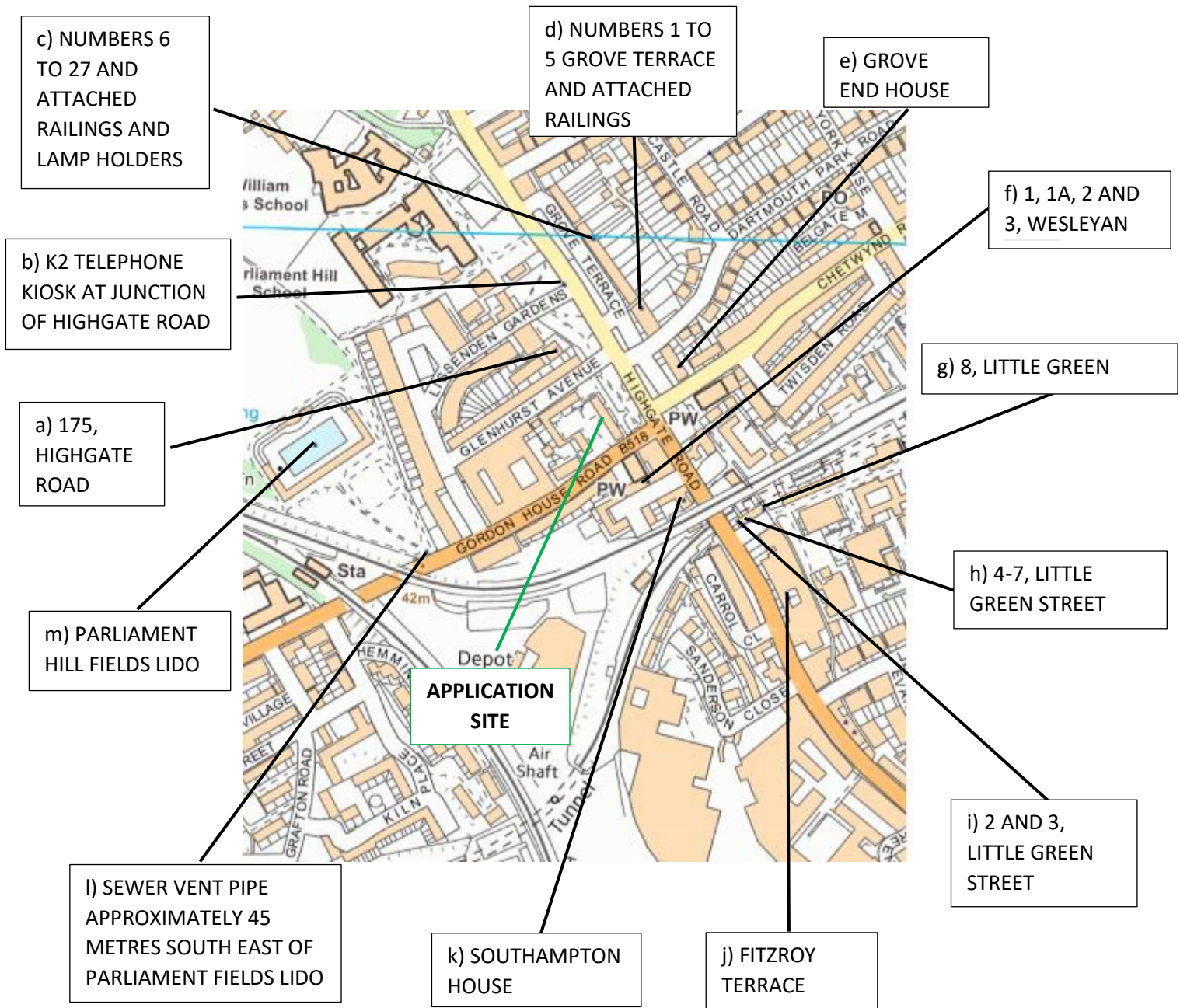


Figure 3

The proposal and its potential relationship with and impact on nearby heritage assets

Paragraph 200 of the NPPF states that, '*Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification*'.

As new antennas and cabinets are proposed at this location, an impact assessment has been undertaken in regard to the thirteen heritage assets listed above and Dartmouth Park Conservation Area.

Photomontages have been included within this application, which illustrate views of the equipment from different angles. It is considered that these photomontages illustrate that the visual impact would be low and therefore the public benefit would outweigh the limited visual impact.

The Proposal and Haddo House:

The proposal is for a rooftop telecommunications installation upon Haddo House in Camden. Haddo House, a housing scheme, that was designed by Robert Bailie in 1965.

As described in the Conservation Area Appraisal and Management Statement¹:

"The block facing Highgate Road has a top floor set-back, the horizontal arrangements of panels and bands of glazing form a rhythm with the open balconies. These elements are regularly divided into pure squares around exposed curved service towers containing stairs that contrast entirely to the body of the building. The towers are finely executed with fins between slim glazing bars giving a ribbed effect. They appear to float over the base of the building being supported by single fluted columns. The recent horizontal lighting scheme has distorted the vertical design concept."

Haddo House measures approximately 25.19m in height. The proposed installation comprises of 3no. antennas fixed to poles, positioned at a height of 23.74 metres, 3no. cabinets positioned upon the lower roof level and 1no. meter cabinet at ground level and ancillary works thereto.

Currently on the rooftop of Haddo House, there are two turrets of significant height and bulk, along with steel hand railings surrounding the entire upper roof level at heights of 20.34m and 23.05m, along with various TV aerials, satellite dishes and flues.

The proposed antennas will be installed on three areas of the lower roof level, 1no. antenna will be located on north eastern corner, 1no. antenna located on the south east corner and 1no. antenna located on the south west corner. The height to the top of the antennas measures 23.74 metres which does not exceed the existing height of the building. It should be noted that the antennas need to be installed at this height and location so that they are able to clear surrounding clutter and avoid clipping. When

¹ <https://www.camden.gov.uk/documents/20142/7469393/Dartmouth+Park.pdf/3608cf4e-28bd-7b02-344f-a50463fba27a>

placing this equipment on the building, the applicant has aimed to minimise the impact above the roofline commensurate with technical constraints. The proposed antennas need to be installed at this height and location so that they are able to clear surrounding clutter and negate clipping.

The proposed equipment cabinets will be arranged neatly against the side of the higher roof level, set back from the roof-edge and so will not be readily visible from street level. These cabinets will not be viewed from ground level and pose minimal visual impact to the amenity and character of the surrounding area.

Parliament Hill:

Parliament Hill is designated as “*Metropolitan Open Land*” and is located to the west of the host building. There are a row of houses/flats which line the boundary of Parliament Hill, measuring approximately 19 metres in height, which is only 6-7 metres lower than the proposed antenna height. It is likely that the distance, combined with the adjacent flats/houses and the size of the roof in relation to the proposed antennas, would provide context and mitigate any views from this vantage point (see Figure 4 below).

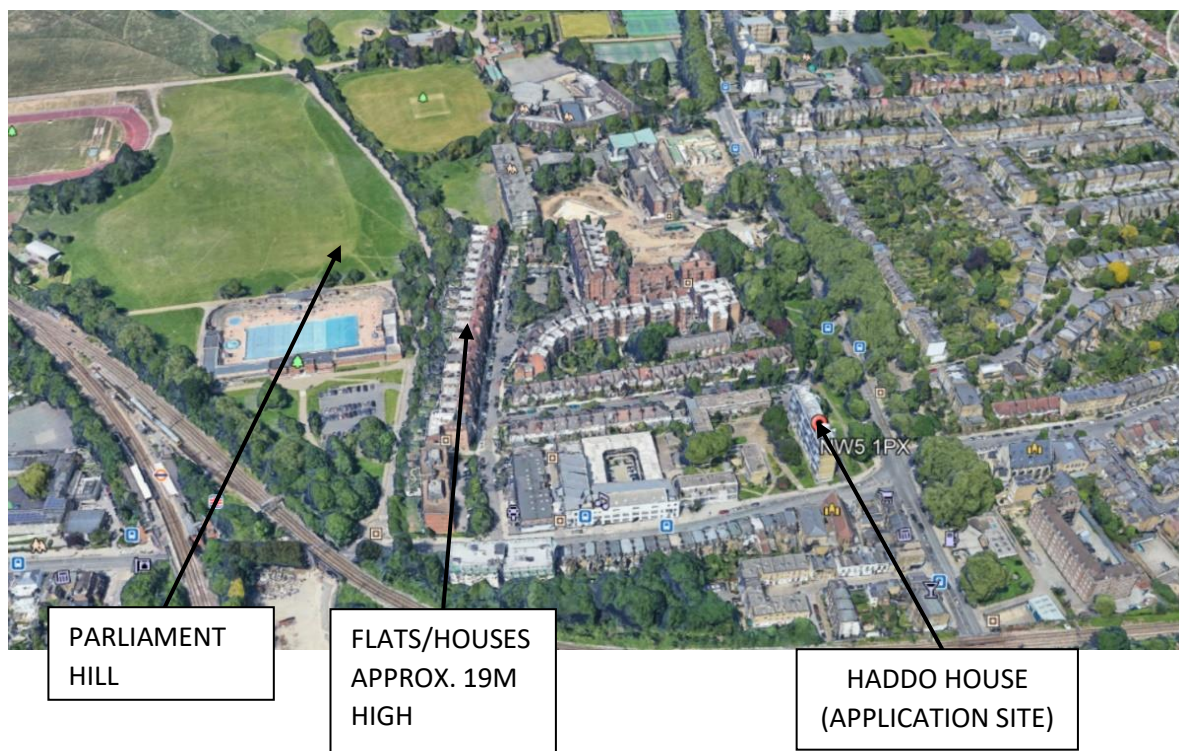


Figure 1

It is acknowledged that views of the equipment will be available, however, every effort has been made to minimise the visual impact of the site. The host building has been selected as it is an existing structure and will allow the equipment to have a large degree of visual screening by the surrounding mature trees along Highgate Road and Glenhurst Avenue and the development in the area. The equipment has been

designed so that it does not protrude the skyline of the area. The existing TV aerials protrude above the roof level to a greater extent than the proposed antennas. Any equipment will benefit from the visual screening provided by the lift motor rooms located on the rooftops highest point, therefore further minimising any visual impact.

Impact on Heritage Assets:

The impact on each of the Listed Buildings nearby has been assessed below.

a) 175 Highgate Road (List Entry Number: 1379011)

This Grade II Listed property is the closest Heritage asset to the application site, situated approximately 66m northwest. The property can be accessed from Lissenden Gardens. The property is situated amongst dense mature trees and a small amenity area to the east and terraced housing (along Glenhurst Avenue) immediately south. This property has no views of the application site. The terraced houses along Glenhurst Road back on to this property and are of similar scale and height. Given the proximity of these trees to the property, and the distance from the application site, it is considered that there will be no significant harm to the heritage asset or its setting, as the application will be suitably screened by the existing terraces that run east to west along Glenhurst Avenue.

b) K2 Telephone Kiosk at Junction of Highgate Road (List Entry Number: 1379341)

This Grade II Listed Kiosk is situated approximately 121m north of the application site, on the northern side of Lissenden Gardens and at the Junction with Highgate Road. The Kiosk is surrounded by dense mature trees, to the south, that line both Highgate Road and Lissenden Gardens. This significant tree cover provides screening and ensures that there will be no significant harm to the heritage asset or its setting.

c) Numbers 6 To 27 Grove Terrace and Attached Railings and Lamp Holders (List Entry)

This Grade II* Listed terrace of houses is situated approximately 164m northeast of the application site along Grove Terrace which runs parallel with Highgate Road. A row of dense, mature trees are positioned at regular intervals along a grassed verge, that intersects Highgate Road and Grove Terrace. Given the level of local tree screening along Grove Terrace/Highgate Road, it is considered that there will be no significant harm caused to this heritage asset, or its setting, as a consequence of the proposed installation at the application site.

d) Numbers 1 to 5 Grove Terrace and Attached Railings (List Entry Number: 1246373)

This Grade II Listed terrace of houses is situated approximately 85.5m northeast of the application site. These terraces are adjacent to numbers 6-27 Grove Terrace outlined above and also benefit from substantial tree cover. Given the level of local tree screening along Grove Terrace/Highgate Road, it is considered that there will be no

significant harm caused to this heritage asset, or its setting, as a consequence of the proposed installation at the application site.

e) Grove End House (List Entry Number: 1379010)

This Grade II Listed Building is the approximately 85.5 east of the application site. Whilst there is significant tree cover in the surrounding area, intermittently positioned and allowing medium- and long-range public and residential views of the installation to be filtered, it is anticipated that there may be some views of the upper level of the proposed installation, from this location, when there is less foliage in winter months. Views of one of the antennas located on the north-eastern side of Haddo House may be visible, however for operational reasons, this antenna cannot be repositioned or screened. It is however, considered that whilst the proposed installation may be visible, its presence is unlikely to cause significant harm to the heritage asset, and, upon balancing the public benefits of the proposal against the harm to the heritage asset, would find in favour of the proposal.

f) 1, 1A, 2 and 3, Wesleyan Place (List Entry Number: 1379176)

These Grade 2 Listed Buildings are situated approximately 88m southeast of application site, with northerly and southerly viewing spheres. These properties back on to a Church and larger scale buildings situated along Gordon House to the north. Due to the visual barrier of the built environment, providing screening, it is considered that there will be no significant harm to this heritage asset of its setting.

g) 8 Little Green Street (List Entry Number: 1379345)

This Grade II Listed Building is approximately 187.7 metres southeast of the application site, located to the south of the railway line ensuring a good visual buffer between the setting of this heritage asset and the proposed site. Owing to the scale of the proposal and this heritage asset plus the distance between them, it is therefore considered that there will be no significant harm to this heritage asset of its setting.

h) 4 - 7 Little Green Street (List Entry Number: 1379344)

These Grade II Listed properties sit immediately adjacent 8 Little Green Street (List Entry Number: 1379345) as above. It is therefore considered that the same heritage impacts apply to these properties as the one above. Owing to the scale of the proposal and this heritage asset plus the distance between them, it is therefore considered that there will be no significant harm to this heritage asset of its setting.

i) 2 and 3 Little Green Street (List Entry Number: 1379343)

These Grade II Listed properties site immediately adjacent 4 - 7 Little Green Street (List Entry Number: 1379344) as above. It is therefore considered that the same heritage impacts apply to these properties as the properties above. Owing to the scale of the proposal and this heritage asset plus the distance between them, it is therefore considered that there will be no significant harm to this heritage asset of its setting.

j) Fitzroy Terrace (List Entry Number: 1378944)

This Grade II Listed Building is situated approximately 258 metres southeast of the application site. Located further south of Little Green Street, it is therefore considered that the same heritage impacts apply to these properties as the properties above. Owing to the scale of the proposal and this heritage asset plus the distance between them, it is therefore considered that there will be no significant harm to this heritage asset of its setting.

k) Southampton House (List Entry Number: 1378946)

This Grade II Listed Building is situated approximately 122 metres southeast of the application site with southerly, westerly and easterly viewing spheres. Owing to the surrounding built-up environment, tree cover, orientation and distance from the application site, it is considered that there will be no significant harm to this heritage asset of its setting.

l) Sewer Vent Pipe Approximately 45 Metres South East of Parliament Fields Lido

This Grade II Listed Building is located approximately 220 metres southwest of the application site along Gordon house Road. Due to the small scale of this heritage asset, the distance from the application site and significant tree screening, it is considered that there will be no significant harm to this heritage asset of its setting.

m) Parliament Hill Fields Lido (List Entry Number: 1113025)

This Grade II Listed Building is located approximately 271 metres west of the site. As per Figure 4 above, the existing terraced housing located along Lissenden Gardens, at approximately 19.00m in height provide a good visual buffer between the setting of this heritage asset and the proposed site. Given the distance and the built environment surrounding this heritage asset, it is considered that there will be no significant harm to this heritage asset of its setting.

Summary of Impacts:

It is anticipated that the majority of public views of the proposed installation will be from road-users travelling on the Gordon House Road and residential properties on this road. Given the distances involved, and the fact that a number of the heritage assets do not have views of the application site, it is considered that installing telecoms apparatus on a rooftop, allows the character of the area to remain the same as the equipment will not be directly visible from ground level. Given the location of the application site, the applicant has attempted to utilise the local topography of the area, as well as the natural screening (mature tree cover) and man-made screening (surrounding built environment) to ensure its prominence is reduced as far as practicable. It is therefore considered that the proposal before the Council will cause no significant harm to the local heritage assets, or their settings or the setting of the Conservation Area.

Although there is a relatively substantial amount of equipment proposed, it is considered its appearance would not appear excessive due to the height of the building. Any impact would be outweighed by the significant benefits of the proposal,

achieving continued and enhanced coverage to the area for Telefonica. It is considered the proposal complies with both national and local policy. It is of significance that the development ensures a continued provision of local community facilities and services.

Having completed an impact assessment on the thirteen Listed Buildings and surrounding Conservation Area, it is considered that any harm to these assets, that might arise as a result of the development subject to this application, is clearly less than substantial.

Potential Harm vs Public Benefits

Regarding 'harm', paragraph 202 notes that, *'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset that harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'*.

The Government supports telecommunications, especially given their widely published public benefits. This is evidenced by the DCMS who launched their UK wide Digital Connectivity Portal on 20 December 2018. The Digital connectivity portal provides guidance for local authorities and network providers on improving connectivity in local areas. The Government wants everyone in the UK to benefit from world-class connectivity no matter where they live, work or travel.

This support for the continued improvement to the mobile communications network including 5G services was also set out in *"Collaborating for Digital Connectivity"*² of March 2019. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers stated: *'...We would also like the UK to be a world leader in 5G, with the majority of the population covered by a 5G signal by 2027. We are writing to ask for your help in supporting the investment necessary to achieve these objectives'*.

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026³. Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

The reasoning behind the placement and design of the proposed development is set out within the accompanying Supplementary Information document, which details why the proposed equipment should take the proposed form and be located in the selected position. This provides the reasoned justification for the 'harm' caused. The supporting document also sets out the need to deploy the equipment and the 'public benefits' that will flow from this necessary process.

² file:///C:/Users/ciara.daly/Downloads/DC_19_111668-DCMS_MHCLG_COLLABORATING_FOR_DIGITAL_CONNECTIVITY_LETTER-781753.pdf

³ <https://www.mobileuk.org/mobile-uk-launch-of-new-report-councils-and-connectivity>

The host building is substantial, and the proposal would have a minimal impact on the application site and the surrounding Conservation area. Although visible from certain viewpoints any impact would be minimal, due to the building height and the location of the equipment. Although the building is located within Dartmouth Park Conservation Area, the sympathetic design ensures there would be limited harm to the heritage asset

The NPPF is clear that that harm should be weighed against the public benefits of the proposal. The Planning Inspectorate has in recent years continually recognised the importance of connectivity. When applying the balancing exercise encouraged at paragraph 202 of the NPPF the Inspectorate has found in multiple cases that the provision, or prevention of loss to existing services can outweigh less than substantial harm to heritage assets.

In determining one such appeal, brought operator Telefónica (O2) against the decision of the London Borough of Harrow to refuse prior approval for the installation of a 12.5 metre high monopole with shrouded antenna section and accompanied by an equipment cabinet on a roadside verge in the urban area of Harrow-on-the-Hill (appeal reference APP/M5450/W/17/3180345, determined in December 2017), the Inspector concluded that:

“The proposal would be permitted development and provide public benefits in extending the telecommunications capacity of the area. In applying the balancing test of paragraph 134 of the Framework, I consider that these benefits outweigh the harm that would arise from the proposal’s impact on the character and appearance of the Conservation Area”.

These findings were echoed by the Inspectorate in determining a further case brought by the same Appellants against the decision of the London Borough of Hillingdon to refuse planning permission for a 15 metre high monopole with shrouded antenna section and associated equipment housing at a roadside location within the urban area of West Drayton (APP/R5510/W/16/3143922, 2016).

The Inspector concluded: *“The Framework sets out the importance of an advanced high quality communications infrastructure for sustainable growth and makes specific reference to the development of high speed broadband technology. This is reflected in the London Plan and the public benefit arising from the improvement of the telecommunications infrastructure is a material planning consideration that weighs in favour of the proposal.*

Taking account of all matters I have concluded that the limited harm caused to the significance of the heritage asset (the CA) would be outweighed by the public benefit that would arise from improving the communications infrastructure”.

The proposal is much more discreet than a 12.5m or 15m mast in a Conservation Area as per the above allowed appeals. Any perceived negative visual impacts will be far outweighed by the overall benefits of the scheme.

In both appeal cases outlined above, the cited the developments were new base station installations proposed within Conservation Areas and it was determined that they would give rise to a degree of harm to the heritage asset in question. Despite this, the importance of providing a quality communications infrastructure was recognised by the Inspectorate and awarded due weight in the determination of the cases brought. That weight was sufficient for both appeals to be successful despite the recognised harm. In the case of this application, the same public benefit occurs.

The limited harm identified to the surrounding Conservation Area, is outweighed by the significant public benefits of the proposal and it follows that significant weight should be given to the need to allow the Applicant develop this communications site in view of the wider socio-economic and sustainable development benefits of ensuring high quality, reliable, mobile communications and connectivity services are in place.