

Comments/objection submitted 10 December 2022 from Hamish Birchall to the Waldon Crest View revised phone mast planning application, ref 2022/4190/P

Introduction

I strongly object to this latest application by Waldon (on behalf of its clients EE and H3G), as I did to Waldon's first such application made in 2020, planning application ref 2021/0598/P.

The grounds for my objection on siting and appearance grounds remain broadly the same, but with significant new elements in relation to Waldon's Crest View siting rationale.

Headline points:

1. The visual impact will be just as bad as in the previous application.
2. Waldon's "loss of nearby site" reasons for choosing Crest View are demonstrably false.
3. The Dartmouth Park Hill reservoir is a viable alternative site.
4. The bat survey was seriously flawed and needs to be redone.
5. Anomalies within Waldon's Supplementary Information form responses.

1. Appearance – just as bad

1.1 Waldon claims in its latest application that the cluster of radio masts and associated telecoms equipment proposed for the roof of Crest View will have "*only a minimal visual impact*" and "*is appropriate to the site and surrounding area and avoids any unacceptable level of impact.*" ["Supplementary Info", p6 last para]

1.2 Crest View is a prominent landmark, visible for many miles around. It dominates the eastern border of the Camden Dartmouth Park conservation area and overlooks the Islington St John's Grove conservation area. It is located virtually adjacent to a Grade II star listed church, St Mary Brookfield.

1.3 Crest View's roof is free of any aerials or dishes, as was the case before Waldon's 2020 application. The roof presents clean lines in profile, as seen from Hampstead Heath, for example, or from the Holly Lodge estate, or on approach from the north down Dartmouth Park Hill, or as viewed looking north from Brecknock Road and beyond (see the four photos in Appendix 1 below).

1.4 Broadcasters filming from Parliament Hill or high points in surrounding areas, invariably include a shot of Crest View and St Mary's (viz BBC Countryfile special "Hidden Treasures", 28.2.2021).

1.5 The cluster of equipment now proposed for installation on Crest View's central lift housing is taller than those proposed in the 2021 application, and those masts were about one third the height of the building.

1.6 How could that result in a "minimal visual impact"? The answer, of course is: it cannot.

1.7 Waldon makes much in its new application of moving some of the telecoms equipment from the roof edges (p12, "Supplementary Info"). The only visual difference that will make is for people at the foot of the building. From every other vantage point, the equipment will stand out just as much, if not more, than it would have done in the first proposed installation.

1.8 Waldon further comments that Crest View is considered a “negative feature within the conservation area” and “the equipment is not proposed to be located on a building of any architectural merit”.

1.9 Those are matters of opinion, but if we were to accept them, as Waldon clearly does, it follows that installing a cluster of tall radio masts on the top of such a building could only reinforce any pre-existing negative visual impact.

1.10 Inevitably, given the juxtaposition of Crest View and the Grade II star listed St Mary Brookfield church, the visual impact on nearby heritage assets would be harmed.

2. Siting rationale – Waldon’s false grounds

2.1 The opening paragraph of Waldon’s notification letter of 16 September 2022 to residents states the reason for having to choose Crest View:

“Mobile operators EE and 3 (H3G) had a radio base station located at the Hill House, Highgate Hill, Archway which provided network coverage to your area. This site has been lost from the network for reasons beyond the operator’s control.”

2.2 The loss of Hill House is likewise suggested as the reason for choosing Crest View as the replacement site in Waldon’s current 2022 “Supplementary Information” submission to Camden (see section 3, “Proposed Development”, p3 and following).

2.3 But in fact Waldon had **expressly ruled out Hill House** before its original 2020 Crest View radio masts planning application to Camden:

“This is the site which originally accommodated equipment for EE and H3G, and the building has now been redeveloped. Initially it was the intention to use the replacement Hill House building. However, changes to the network in the area due to changes in neighbouring cells has led to a change in the search area for a replacement site. Hill House would no longer cover the search requirement and has therefore been discounted.”

[“Supplementary Information”, p7, last entry, submitted to Camden early 2021, application ref 2021/0598/P]

2.4 Indeed, the very same statement is found within Waldon’s 2022 Supplementary Information submission to Camden at the bottom of p10 carrying over onto p11.

2.5 Now consider “14414 Tottenham Court Road”, the loss of which site Waldon claimed in 2020 was the reason for choosing Crest View as the replacement. Waldon’s 17 June 2020 letter to residents stated:

“Mobile operators EE and 3 (H3G) had a radio base station located at 14414 Tottenham Court Road which provided network coverage to your area. This site was lost from the network for reasons beyond the operator’s control.”

[Waldon ref CA/MBNL/55599]

2.6 11414 Tottenham Court Road does not exist. There is not and never has been a 14414 Tottenham Court Road.

2.7 But even if 14414 Tottenham Court Road had existed it would be at least 2.5 miles from Crest View. If a Tottenham Court Road site was sufficiently close to meet EE/H3G's signal reach needs around Crest View, then many other buildings within 2.5 miles of Crest View could be suitable alternatives.

2.8 Waldon's list of considered but excluded sites omits to mention the Whittington Hospital, the Royal Free Hospital or the Islington Mental Health centre. All stand higher than Crest View and oversee Waldon's required signal area. The Royal Free Hospital already has some telecoms mast installations.

3. Dartmouth Park Hill covered reservoir is a viable alternative site

3.1 Dartmouth Park Hill covered reservoir is dismissed by Waldon because being a "greenfield site", the equipment "would have a greater visual impact than a rooftop site" and "there is lack of space for an installation on the site".

3.2 Those last two claims are untrue: there is no lack of space and the installation could be disguised.

3.3 The reservoir area is large and the covered reservoir structure itself is surrounded by broad and deep grassed earth banks on which masts and supporting equipment could easily be sited. Thames Water completed major underpinning works at the site earlier this year.

3.4 Valmont, the company that makes the antennae/aperture supports proposed by Waldon for Crest View, is a US company with UK base in Stockton-on-Tees. It specialises in disguised antennae equipment, including masts disguised as trees or street lighting. Their website states:

"Often, the customers who demand reliable wireless service are the same ones who don't want a tower hovering over their home. We pioneered Minimum Visual Impact (MVI) or disguised towers with those customers in mind. They won't even notice a disguised tower. Instead, they'll see a flagpole, tree or clock tower never aware that there's a wireless tower underneath."

[See: <https://www.valmont.com/home/products-and-solutions/telecommunication/disguised>]

3.5 In conclusion, in my view Waldon's underlying rationale is to pursue a relatively cheap, simple solution, and to avoid viable alternative sites and designs that would be more sympathetic to the area. But EE and H3G are billion-pound businesses. If coverage in this area is so important to them, they should be prepared to pay for as sympathetic an installation as possible.

4. Bats

4.1 Several species of bat can be seen at twilight during the summer months flitting about Crest View, most likely pipistrelle and horseshoe.

4.2 Waldon's bat survey, undertaken on Wednesday 20 January 2021 by a company called Arbtech, was inadequate and needs to be redone, for these reasons:

- (a) The report dating is incorrect: it states that the first draft was prepared 21 February 2021, but the final, reviewed draft is dated 26 January 2020.
- (b) Under the Executive Summary its objectives include assessing "... the suitability of the site for barn owls". A professional ecologist should know that the last recorded sighting of a barn owl near here was 1895 (Hampstead Heath).

- (c) Under 1.2 “Site context” it states that there are “two buildings and two trees within the site boundary”. That is incorrect. The Crest View property boundary extends significantly further than the plan provided in Appendix 1. There is a communal garden at the front of the building featuring 9 trees: 6 mature pollarded lime trees, one young but tall silver birch (20+ ft) and two mature hawthorns.
- (d) Both the communal garden and the 18 garages within the Crest View property boundary were missed on the site boundary as defined by Arbtech.
- (e) 8 of the garages are integral to the base of the apartment block on the south side, parallel with Dartmouth Park Road; 6 are within an outbuilding oriented north/south at the western property boundary; 4 project from the western side of the apartment block.
- (f) There is also an electricity sub-station projecting from the west side of the block, on the Dartmouth Park Road side.
- (g) In addition there is a paladin waste area at the back, enclosed with wooden doors and louvred ventilation, a back entrance and three storage facilities with door entrances, all integral to the apartment block itself.
- (h) These additional buildings/structures are relevant to any bat survey here in that there are many apertures of various kinds into which the pipistrelle bat (the smallest UK species) could readily enter, whether gaps between doors and walls, or louvred openings (such as the paladin waste area and the electricity sub-station).
- (i) But none of the garages, nor the electricity sub-station, nor the paladin bin area, nor storage facilities were internally inspected by Arbtech.
- (j) Another significant area that was missed was the block wall on the north side where it abuts our neighbour’s property at 49 Dartmouth Park Hill. Bats flit over this part of our neighbour’s roof on their summer evening foraging.
- (k) Waldon suggested that data confidentiality prevented them from accessing local bat records. That is misleading in that those records for the two most important local bat sites, Hampstead Heath and Highgate Cemetery are publicly available. Highgate Cemetery confirmed to me that they had not been approached by Waldon; to the best of my knowledge, the City of London Corporation which is responsible for Hampstead Heath had also not been approached by Waldon.
- (l) Last, but not least, none of the flats’ balconies were inspected. There are small crevices on these. Adjacent to my own 2nd floor west-facing balcony there is an obvious recess in the brickwork that might offer temporary shelter to a bat.

5. Anomalies in Waldon’s Supplementary Information form responses

5.1 “N/A” is Waldon’s response to Camden’s section 2 question: “Were industry site databases checked for suitable sites by the operator”. Why?

5.2 Why was Heathrow Airport consulted by Waldon? (see top of p3). It is not “within 3km” of Crest View; it is over 20kms distant, and the runways are below Crest View’s line of sight.

5.3 On p7, Waldon states:

“The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation in the national interest.”

5.4 But police helicopters regularly fly low over Crest View, as well as British Army Chinooks and other military helicopters on exercises and first aid emergencies, landing on Hampstead Heath in direct line of sight of Crest View’s rooftop.

Appendix 1 – Four photos of Crest View and St Mary Brookfield Church

1. Crest View from the western end of Dartmouth Park Road



2. Crest View as seen looking south from Dartmouth Park Hill



3. Crest View and St Mary Brookfield Church seen from the Holly Lodge estate



4. St Mary Brookfield Church with Crest View lift housing behind, from Brecknock Road

