



Mr Sam Fitzpatrick  
London Borough of Camden  
Town Hall  
London  
WC1H 9JE

Direct Dial: 02079733762

Our ref: P01553261

19 December 2022

Dear Mr Fitzpatrick

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**CRESTVIEW 47 DARTMOUTH PARK HILL LONDON NW5 1JB  
Application No. 2022/4190/P**

Thank you for your letter of 8 December 2022 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

The site is within the Dartmouth Park Conservation Area, immediately opposite the Grade II\* listed church of St Mary Brookfield. The conservation area is a residential area with a range of housing from the eighteenth century onwards, a high degree of greenery, and good views across its roofscape due to its topography.

St Mary's is a striking Victorian church by eminent architect William Butterfield. Despite having no tower or spire, its lofty nave, stone banding and large clerestory windows give it a strong presence, and it is a fine building worthy of its Grade II\* listing. Not only is St Mary of more than special interest in itself, it is also an important landmark in the conservation area. Though churches will usually act as focal points, St Mary's is unusually prominent in the suburban landscape, perched as it is at the top of Dartmouth Park Hill. This prominence is an important part of its significance.

Crestview, the building on which the installation would take place, is not of special interest. The building identified as a negative feature of the conservation area, and detracts from the appreciation of the listed church through its dominant size, and by competing with it as a focal point on the hill.

The scheme is for the installation of six 5G masts to centre of the roof of Crestview, rising five metres above the parapet height of the building, and associated equipment. Together, this will add considerably to the clutter to the roof of the block, increasing its



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prominence in the setting of the church. The masts are likely to be visible in conjunction with the church in several views from within and outside the conservation area, including in identified conservation area views from the west and south, and in long views from Hampstead Heath.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on planning authorities to consider the impact of proposals upon listed buildings and their settings. Section 72 of the Act requires local authorities to have special regard to the desirability of preserving or enhancing the character or appearance of conservation areas.

Government guidance on how to carry out these duties is found in the National Planning Policy Framework 2021 (NPPF). The NPPF makes it clear that avoiding or minimising conflicts between conservation of an asset and any aspect of a proposal is important (para.195). When considering the impact of a proposed development on a heritage asset, whatever the level of harm, local planning authorities should give great weight to preserving the asset's significance (para.199). Any harm or loss should require clear and convincing justification (para.200). Any harm caused to a heritage asset requires that harm to be weighed against the public benefits of the proposals (para.202).

The application documents draw attention to policy SI6 of the London Plan in support of the scheme. We would note that part A4 of this policy makes clear that digital infrastructure should be "well-designed and suitably located". Policy HC1 of the London Plan states that development proposals should conserve the significance of heritage assets, whether they affect the assets themselves or their setting.

St Mary's is an architecturally significant building with particularly strong landmark qualities, given its location and wide visibility. The ability to appreciate it as a fine, dominant structure in the area is very important. Given that Crestview is already a negative element in the setting of the church, in part because of its height, the introduction of large, highly functional new elements to its roof exacerbates this existing harm. The experience of the architecture and roof forms of St Mary's in the suburban landscape would be damaged further by backing or closely juxtaposing it, in multiple views, with prominent structures and associated lower level clutter.

The focus of our comments on this application is the setting of the Grade II\* church, as a highly important building in the conservation area. Other effects may arise from this scheme, and we recommend you take advice from your own conservation advisers regarding this.

## Recommendation



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Historic England has concerns regarding the application on heritage grounds, as we consider it will cause harm to a Grade II\* church through development in its setting and, through that, harm to the Dartmouth Park Conservation Area. We consider that, to meet the requirements of the NPPF, this harm should not be permitted unless clearly and convincingly justified, and outweighed by sufficient public benefits. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority. The full GLAAS consultation criteria are on our webpage at the following link: <https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

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