



Fabien Bernard-Gaudin
Finchley & Golders Green Planning Team
London Borough of Barnet
Barnet House
1255 High Road, Whetstone
London N20 OEJ

16 August 2007

Dear Mr Bernard-Gaudin

C17228/07 – Highways Land at junction of Litchfield Way/Meadway, London NW11

We understand that an application has been received for a mobile phone transmitter within the HGS Conservation Area at the above location. On behalf of the HGS Residents Association, we wish to lodge a strenuous objection.

The HGS Conservation Area is subject to an Article IV Direction which requires owners of properties to submit applications to a very high standard of design and materials. Any alterations to properties must “preserve or enhance” the conservation area. We consider that any development in the street (such as a mobile phone transmitter which requires planning consent) should conform to an equally high standard. We do not consider that this application for a transmitter conforms to this standard and does not “preserve or enhance” and should therefore be rejected.

The increased street furniture that the mast and electrical cabinet would create would be an inappropriate addition and would be highly prominent in the street scene. The pole and cabinet would cause a significant loss of visual amenity to the residents within sight of it.

The proposal is severely contravening policies D16 and D1 and ~~D~~, D7 of the Barnet UDP, adopted May 2006.

Policy D16 states that proposals for telecommunications equipment will be permitted where:

- 1. it can be demonstrated that there are no significant adverse visual affects on the ...character of heritage land and areas of special character.*

The Hampstead Garden Suburb Residents Association
is the representative body for residents of
Hampstead Garden Suburb. It is believed to be
the largest such association in the UK.

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2. *the special character or appearance of... conservation areas are preserved or enhanced*
3. *they are appropriately designed, coloured and landscaped to take account of their setting*
4. *there is no significant adverse impact on the visual amenity of neighbouring occupiers*

Policy D1 states: *“in sensitive areas such as conservation areas... and areas of special character, particular care is needed to ensure designs preserve or enhance the special qualities of the area.”*

The design, materials and dimensions of the application cannot be justifiably claimed to conform to the recommendations for the camouflage of such transmitters. In particular section 24 of the *Planning Policy Guide Telecommunications PPG8*, revised September 2003 states:

“In seeking to arrive at the best solution for an individual site, authorities and operators should use sympathetic design and camouflage to minimise the impact of development on the environment. Particularly in designated areas, the aim should be for apparatus to blend into the landscape.”

We notice that the mast is described as a ‘telegraph pole’. It will not look like the other telegraph poles around it as it will not be constructed of the same materials and will not have wires attached to it. In addition other telegraph poles are not accompanied by large cabinets.

Detailed recommendations for camouflage are also contained in *Code of Best Practice: Mobile Phone Network Development* published by the Office of the Deputy Prime Minister, 2002 . The current application has not adopted the recommendations contained in that document. The HGS Article IV Conservation Area is such a *designated area*.

In addition the transmitter in question will be accompanied by an equipment box. These equipment boxes attract graffiti and are unsightly. There is a very serious problem with graffiti in the Suburb on the existing phone and cable TV boxes which are similar in size to the proposed equipment boxes.

Photographs of mobile phone transmitter boxes not far from our conservation area illustrate how detrimental to the character of the Conservation Area this equipment can be. As well as the graffiti, there is no standardisation of size, designs or colours. It would be extraordinary that permission could be contemplated for such proposals when in the Article IV Direction, even the colour of paint on the front door of a resident’s house is subject to planning consent.



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We suggest the test should be whether permission would be granted to a resident who wished to erect the proposed equipment boxes in his or her front garden. The answer would self-evidently be no.

Part of our Association's work is concerned with reducing the amount of street clutter in the area. We feel this application is contrary to good practice contained in *Streets for All: A guide to the management of London's streets* published by English Heritage which was commissioned by English Heritage, the Government Office for London, the London Forum and the Pedestrians Association. This publication describes good practice for Street Furniture.

We note that the latest Stewart Report (January 2005) on mobile phone emissions recommends a "precautionary approach" where transmitters are proposed in residential areas and near schools. The proposed location is close to Kerem Nursery School.

We refer to seven appeal decisions where appeals have been dismissed for mobile phone transmitters in the HGS Conservation Area: Addison Way (2007; C16919B/06); Kenwood Close/Hampstead Lane (2006; C16391/05); Lyttelton Road (2006: C16333A/05); Kingsley Way/Meadway (2006: C16474/06); Highways Verge 190 Falloden Way (2004; C14891A/03); Highways Verge, Spaniards Road (2002; C14341/01); Junction of Ossulton Way and Lyttelton Road (2001; C14083/00). We suggest that these are precedents which you must follow.

We therefore urge you to reject this application as damaging to the character of the Conservation Area and inconsistent with current standards of good practice as laid out in your UDP, PPG15, PPG8, the English Heritage document, the Code of Best Practice and the previous refusals of which seven were appealed and your decision was upheld in all six cases.

If officers are minded to accept this application, we would request that a member of our Association be permitted to speak in person at the Planning Committee or Sub-Committee meeting.

Yours sincerely

David B Lewis, Chairman