

James Argles

From: Planning Support
Subject: FW: Comment Received from Public Access

Application Reference No. : HGY/2022/2402
Site Address: Outside 550 White Hart Lane London N17 7RQ
Comments by: Viktoria Holok
From:
Brian Court
2 Rowland Road

N17 7EL

Submission: Objection

Comments: I am absolutely object to this mass as it is massively destructive to the environment, view and neighbourhood. This cannot be just forced on residents.

The issues I would like to raise with you refer to:

Disruption of the character and appearance of the area including street scene prominence

1.a Local area heritage is incompatible with perpetuating an industrial appearance such as that which would result due to the proposed application.

Issues affecting the success of the project, signal efficiency and coverage of the antennas.

Outdated and misleading information in the Town Planning Policy Maps and Public Information.

Health hazard considerations in relation to the increasing population density in the area and 24/7 prolonged exposure to EMF.

Here are the details on each of these points:

Disruption of the character and appearance of the area including street scene prominence

The mast scale and aspect are out of character with the existing properties in its proximity and would be a prominent feature in the streetscene and overall landscape and skyline of the area. The Haringey London Development Management DPD states facilitation of telecommunications development should be 'ensuring as far as possible that any visual impact of the structure on valued features of the Borough's environment is minimised'. This proposal is acting against the protection of one of the best viewpoints of London from the north city area, close to the preserved area of the Alexandra Park hill and high grounds.

  Simulation 1: Simulation of the proposed Three mast and a previous planning application for a Vodafone mast nearby. Impact on skyline and proximity to residential premises.

The mast proposed through this application is a heavy out of scale industrial installation in the proximity of a high population density area that is orientating its daily efforts towards increasing the quality of living in

the area. The Applicant should therefore be supporting of such effort of the residents together with the council and other public planning and policies parties involved in reducing the industrial establishments and objects of such character in N17 and transforming this area in a favourable and desirable residential one.

Residential Visual Amenity Assessment (RVAA) is based on the fact that no individual has the right to a particular view but there comes a point when, by virtue of the proximity, size and scale of a given development/project, a residential property would be rendered so unattractive a place to live that planning permission should be refused. The test of what would be unacceptably unattractive should be an objective test.

The nature and magnitude of the visual effect of the 18m high mast is so great and unfitting for the area that it would affect the living conditions and Residential Amenity of the 100+ properties situated at 500 White Hart Lane 'The Lane' Residential Complex. The official guidance refers to this as the Residential Visual Amenity Threshold. Factors that contribute to the judgement of revoking the planning permission of this mast must include the fact that the development of this 18m high mast would be overwhelming in views from all directions, inescapably dominant and unpleasantly encroaching. As the threshold is reached from an objective point of view as a resident of the area it also becomes a matter of relevance to the Residential Amenity of the residential aspects of the area as well as the Residential Complex and therefore a matter for consideration in the planning process.

The proposed mast location depicted in the image shown Figure 1 of the HGY20803 SSSI and Planning Statement (doc. name HGY20803 SSSI and Planning Statement.22.08.22.cw.pdf.) is biased as it chose to exclude from the picture the proximity of the buildings forming the 'The Lane' Residential Complex. The proposed location appears to be situated only next to a commercial unit, however the adjacent buildings have been purposefully left out of the image. This misleads the reader to create a skewed opinion of how the mast integrates with the character of the immediate area surrounding it.

Simulation 2: Proposed Three mast shown in close proximity to 'The Lane' Residential Complex.

The pictured commercial unit maximum height is 12 meters whereas the proposed antenna greatly surpasses this height at 18 meters: this sets it apart from the commercial buildings and hence visually associates it with the Residential Complex which is a clash of character. With such close proximity it completely dominates the residential character of the development and surrounding area. It also dominates an estimated radial area of 10 miles with no other similar height establishments. Therefore the mast is unfitted and unaccommodated by the landscape and does not blend in with the character of the area in general. It would appear as an error in the landscape and scar on the beautiful heritage of Haringey's skyline. 

Taking a view from the street scene, the industrial mast completely dominates the residential character of The Lane Development - the residential buildings that were built here in 2020 and constitute a beneficial gentrification point for the whole borough and contributes to the council with a large amount of tax per square meter. It is in the best interest of the council that the residential character of the area is therefore encouraged and protected as opposed to it being severely disadvantaged by a tall industrial character feature like the proposed 18m mast. Whilst from some viewpoints e.g. when stood outside the more commercial area of Selco and Segro, a backdrop of trees has been mandatorily included in their projects, as a means of assimilating the new commercial insertions in the area by softening their appearance to help blend in with adjacent residential plots. The industrial mast has not been foreseen with such consideration for the area where it has been inserted. It would appear as a prominent feature severely affecting the character and identity of our area. The National Planning Policy states: 'Where new sites are required

(such as for new 5g networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.' 

The applicant states that they have considered multiple locations for the mast in HGY20803 SSSI and Planning Statement, namely D1, D2, D3, D4 and D5. The proposed location is set in a very residential area. More so than location D1 which was discounted for being 'very residential' when the nearest residential premises are approximately 160m away from that proposed site. The current proposed location is as close as 45m from 'The Lane' Residential Complex which has a significantly larger population density, so this must be taken as a precedent for discounting the proposed location on similar grounds. 

As the case would be with technical projects of this nature, there is rarely the case that such industrial installations do not develop in time, and changes are later permitted such as increases in height and width of such masts or additional satellite masts. These types of details have not been explicitly excluded from this proposal which creates leeway for them to be added later. It also creates a risk of precedent for further industrial installations to follow it. These would add extra visual impact and discrepancies to the area.

1.a Local area heritage is incompatible with perpetuating an industrial appearance such as that which would result due to the proposed application. Instead of helping communities/ counteracting section 12 planning act, which states better places to live and work should be created and be supportive to be developed in such a way which is acceptable to communities, an industrial element is being situated within 45m of a large attractive modern living space and an industrial style element such as the mast would make a discordant note to it.

Directly opposite, the Haringey Borough F.C. Stadium, is one of the main points of interest and attraction in the borough for the whole local community and it plays a role in inspiring a healthy lifestyle for residents. A large percentage of the community transits this area frequently and it encourages the young generations to train here everyday via the local football clubs. The area should contribute to inspiring the spirit of healthy living. National planning policy states a dimension of sustainable development is the 'Social Role - Supporting strong and vibrant and healthy communities'. When in any vicinity of the stadium the mast heavily detracts from the residential aspect of healthy living with an industrial look which clashes with the adjacent residential area. 

Furthermore White Hart Lane itself is local heritage. White Hart Lane has been here for hundreds of years as per the attestations below, long before the A406 which was not considered for this project! We must preserve this heritage and Three should not be trying to defame this history and treat this road as a highway when it is far from it!

White Hart Lane 1910 - Horse Pond next to Rectory

3. Issues affecting the success of the project, signal efficiency and coverage of the antennas.

The basis of the success of a 18m tall 5G set of antennas is heavily dependent on the amount of clear space surrounding it. It is well known that even the smallest obstruction such as leaves on trees are blocking the signal and reducing the efficiency of a given coverage reach. National Planning Policy states In Paragraph 116 that Operators should have 'considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services..'. HGY20803 SSSI and Planning Statement states the proposed site option is the best available compromise between extending 5G service across the target 'coverage hole'. Given the fact that the tallest nearby structure existing at 500 White Hart Lane 'The Lane' 18m tall Residential Complex, is within 45m of the

proposed 18 meter tall mast, it is reasonable to assume that the buildings were presumably not taken into consideration. The interference level from their similar height and the close proximity of the mast in the proposed location to the Residential complex would heavily restrict the effectiveness of the mast. This is clear reason to believe that this antenna would fail in delivering maximum benefit. It is best to be accommodated elsewhere, as far away as possible from these buildings, as the proposed position is undoubtedly chosen without careful consideration of the factors that could contribute to it serving its purpose.

The set of 4 buildings located at 500 White Hart Lane 'The Lane' Residential Complex are all facing the proposed site of the 18 meters high mast and act as a 300 meters long wall blocking the antenna's signal as they are situated in the immediate vicinity of each other. 'The Lane' Residential Complex is a direct obstruction to the antenna signal and based on the coverage map, there are existing telecommunications stations to the East, South and West of the application site which already provide coverage to the residents of this building. Unless the application site is intended for the sole purpose to be a source of signal for the 'The Lane' Residential Complex then this is the least optimal location in the area. The coverage map in the planning application is a biased extract of the map not showing north of the residential complex. Any area North of the development or areas with far less obstruction and far less residential density should be considered such as the A406, great cambridge road northern road junction or north of the lane development around the tottenham recreational ground would be far more successful in terms of signal effectiveness.

National Planning Policy states in Paragraph 115 'The number of radio and electronic communication masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers.' London is one of the most densely populated cities in the world and it is always a challenge siting masts in a manner that provides the most effective service for the greatest possible coverage area. In this instance, the proposed location results in a service which is rendered less effective and subsequently more masts will be needed to pick up the shortfall in coverage.

3. Outdated and misleading information in the Town Planning Policy Maps and Public Information

The area covering 500 White Hart Lane 'The Lane' Residential Complex, outlined in blue in Image 1 below, is wrongly marked on the Planning Policy Maps as 'Warehouse to Residential' instead of actual residential area, hence misleading the Applicant into believing that this is a suitable area for the new 18m high mast to be in the proximity of. The Residential Complex is now densely populated residential land with over 100+ flats and should not be highlighted in the same category as the commercial units contained in the area highlighted as 'Warehouse to Residential'.

Image 1: 'The Lane' Residential Complex outlined in blue is wrongly marked as Warehouse to Residential area instead of actual residential area.

There is no doubt that our apartment complex is now fully residential and is no longer in the warehouse to residential phase as the map depicts and this would mislead a planning application selection process for such an industrial purpose.

4. Health hazard considerations in relation to the increasing population density in the area and 24/7 prolonged exposure to EMF.

The type of antennas such as the ones included in this planning application fall under different EMR considerations regarding population health hazards concerns and the effects of prolonged exposure in the

immediate proximity of the 5G antennas. Such projects raised the attention of hundreds of thousands of scientific research papers worldwide. There is a 5G EMF Appeal signed by more than 250 EU scientists and doctors from 43 nations urgently calling for protective EMF guidelines until the serious potential hazards for human health and environment have been fully investigated by scientists independent of the telecom industry.

The proposed mast at 18m high is within 40-60m from the 18 closest apartments in 'The Lane' Residential Complex, each with large glass windows and balconies with no walls protecting these people living in direct line of sight of continuous signal radiation. The issue is concerning, especially given that working from home policies across the UK mean that people living in the residential complex will be exposed 24/7 to the effects of high frequency radiation. Can the Applicant please provide proof of study or risk assessment that placing an antenna with continuous signal radiation within 40-60m of people 24/7 has no possible detriment on people's health over the course of a lifetime with the direct body exposure level as explained above? The level of certainty must be balanced against the risk of uncertainty. With the extremely close proximity and continuous exposure the risk far outweighs the effort required to relocate the mast.

This is yet another reason to believe that the proximity of the residential development was not considered by the Applicant. It would be only fair to reconsider the position of the mast moved away from the close proximity of a large population density area compared to the rest of the Haringey borough which has a lesser population density.

CONCLUSIONS:

The 18m high mast can find a more suitable position for its placement, away from the densely populated residential area in its proximity, of which it detracts appearance and character. It can serve its purpose better in an area not blocked by tall buildings. I object to the proposed telecoms installation and would kindly ask you to carefully consider a different location further to the north or east towards the A406 highway or the North Cambridge Road.