

Our ref. NET/ A04058

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Chief Planning Officer  
London Borough of Camden  
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Dear Sir or Madam

**PLANNING APPLICATION FOR THE INSTALLATION OF 8NO. ANTENNAS LOCATED WITHIN UPPER WINDOWS BEHIND GRP SCREENING PAINTED TO MATCH EXISTING SLATE LOUVRES, INTERNAL CABINETS AND ANCILLARY DEVELOPMENT THERETO, LOCATED AT ST MARKS CHURCH, ST MARKS SQUARE, PRINCE ALBERT ROAD, LONDON NW1 7TN.**

We are planning consultants retained by NET to submit planning applications on behalf of Cornerstone Telecommunications Infrastructure Limited (CTIL).

Enclosed you will find a full planning application prepared on behalf of CTIL.

The development consists of:

“THE INSTALLATION OF 8NO. ANTENNAS LOCATED WITHIN UPPER WINDOWS BEHIND GRP SCREENING PAINTED TO MATCH EXISTING SLATE LOUVRES, INTERNAL CABINETS AND ANCILLARY DEVELOPMENT THERETO.”

Enclosed is the following:

- Plans A04058 – CTIL -100-, 201, 202, 301, 302, 401, 402, 403, 501, 502 C
- Application forms
- ICNIRP Certificate
- Coverage plots
- Planning Statement (including design and access statement)

A fee is not required, as this application relates to a previous application at the same site, by the same applicant, which was withdrawn in the last 12 months.

We trust you will find the enclosed information sufficient to register and validate the application. If however you require any further information, please contact Rebecca Skerrett on 0161 956 4305 or [rebecca.skerrett@gva.co.uk](mailto:rebecca.skerrett@gva.co.uk)

Yours sincerely

*GVA Grimley*

GVA Grimley Ltd.  
International Property Advisors

## **1. DESIGN AND ACCESS STATEMENT**

In order to comply with the requirements for the submission of planning applications as outlined in Government Circular 01/2006 '*Guidance on Changes to the Development Control System*', the following design and access statement is enclosed in support of the proposal. The statement links the general development principles to the final detailed design.

### **1.1. HISTORY & BACKGROUND**

There is no history of Telecommunications on this site.

The church is Grade II listed. As the church is a place of worship the proposed work falls within the Ecclesiastic Exemption (Listed Buildings and Conservation Areas) Order 1994 and therefore a Listed Building application under the Planning (Listed Buildings and Conservation Areas) Act 1990 is not required although a faculty notification in certain circumstances is submitted to the LPA.

The church is also located within Primrose Hill Conservation Area.

### **DESIGN**

#### **1.1.1. The proposal**

The proposal is for the installation of 8 antennas in the upper window apertures, behind GRP screening painted to match the slate louvres, and internal cabinets.

#### **Design Considerations**

Where ever possible we ensure the scheme is internal so as to not materially alter the aesthetics of the church. In this particular case the antennas will be located internally behind GRP screening painted to match the slate louvres. The screening will be made by specialist crafts people and will be painted to exactly replicate the existing slate louvres. Aesthetically there will be no change to the external appearance of the church.

### **1.2. NET**

NET has forged a close relationship with the churches and has opened up a portfolio of church sites to the operators. NET oversees the whole of the design and build process right from the initial negotiations with the church to the build and the maintenance of the site.

Many of the 16,000 parish and guild churches across England are suitable for housing installations and are widely used by the telecoms operators.

Church buildings have a special significance in the communities they serve, and the mission and environment of the church and its many listed buildings have to be protected. The Church of England has a strict legal process for granting permission to change the fabric of a church building, and this applies to any telecoms installation. Without full understanding of these special needs, church installations can be time consuming and difficult for both the operators and parishes concerned.

NET has worked with the Archbishops' Council to develop a standard approach to both the practical and legal aspects of telecom installations; this has resulted in a quicker and easier process for the applicant.

Church buildings often provide good solutions as they are normally one of the tallest structures in an area and the antennas can be concealed within the structure.

### **1.3. Background to CTIL**

For some years Vodafone and Telefonica (O2) have been operating a network sharing agreement – broadly similar to the Orange/T-Mobile/Three arrangement. This arrangement allowed each company to share the other party's installation.

In September 2012 approval was received from the Office of Fair Trading for the formation of a new company – Cornerstone Telecommunications Infrastructure Ltd (CTIL).

#### **1.3.1. Planning Policy Considerations**

Section 54A of the Town and Country Planning Act 1990 (as amended)(now section 38 (6) of the Planning and Compulsory Purchase Act 2004) states that Local Planning Authorities should determine proposals in accordance with development plan policies, unless material considerations indicate otherwise. Material considerations may include, inter alia, central government guidance, High Court and Inspector's decisions etc.

The London Borough of Camden Replacement UDP was adopted in June 2006.

The following policies are relevant in the determination of this application.

The following aims of the UDP are relevant in the determination of this application.

Making sure development meets our needs, now and in the future

The Council wants development in the borough to be "sustainable" - that is, it should meet today's social, economic and environmental needs in a way that does not harm our ability to meet our needs in the future.

Protecting and enhancing our environment

It is important to ensure that all development takes place in a way that minimises the impact on the environment, locally and globally. The UDP aims to protect Camden's natural environment, including open spaces and the variety of plant and animal species.

It aims to reduce the use of resources, promote efficient use of energy and reduce waste. It also seeks to improve our surroundings through good design in new development, and by conserving what is best about the Borough's built environment, both in individual buildings and across wider areas.

In relation to the aims of the UDP the installation will provide a site which will provide telecommunications coverage now and in the future. The site is not apparent as a host site and therefore protects the environment.

The following policies are relevant in relation to the determination of this application.

**S1 The Council will seek to ensure that all development is sustainable with regard to social needs, the protection of the built and natural environment, the sensible use of resources and the maintenance of a viable economy.**

**S8 The Council will seek to protect and enhance the Borough's open space and conserve and enhance the Borough's biodiversity.**

In relation to these policies a good telecommunications network is important to encourage business to locate into areas. The design protects the built environment as all the works are internal.

## **B5 - Telecommunications**

**The Council will only grant planning permission for telecommunication development where consideration has been given to minimising harm to visual amenity and the environment.**

**The Council will consider:**

- a) the appearance of the development including materials, colour, design, dimensions, overall shape, and type of construction, as well as alternative designs which may be more suitable for the building or environment;
- b) the siting of the development, including the height of the building or site, its relationship to existing topographical features and natural vegetation, its effect on the skyline and views; and its relationship to conservation areas, listed buildings and residential properties;
- c) the relationship of the development to existing telecommunications equipment, any technical constraints on the location and design and the cumulative impact of additional equipment on visual clutter;
- d) the effects on pedestrian and road safety;
- e) the scope for landscaping and screening to reduce the impact of the development on its surroundings;
- f) the scope for sharing of masts and sites and the opportunity to use existing buildings

**and other structures; and**

**g) self-certification to the International Commission on Non-Ionizing Radiation (ICNIRP)**

In relation to the above the proposal is all internal and does not visually alter the exterior of the church therefore it does not create any visual harm to the built environment. We consider that the design is the most appropriate as the works are all internal and visually there will be negligible change to the exterior of the building. The proposal also allows 2 operators to share the site.

As all the works are internal views into and out of the conservation area are not affected and hence the conservation area is protected.

## **B6 - Listed buildings**

**To preserve or enhance the character of listed buildings as buildings of special architectural or historic interest, the Council will only grant listed building consent for:**

**a) the total or substantial demolition of a listed building where exceptional circumstances are shown that outweigh the case for retention; and for**

**b) alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building. The Council will only grant planning permission for the change of use of a listed building where it considers this would not cause harm to its special architectural or historic interest.**

**The Council will not grant planning permission for development that it considers would cause harm to the setting of a listed building.**

In terms of this policy the listed building element will be dealt with under the faculty process. However, Jago developments are the company who will do the GRP screening and they have extensive knowledge of working with Historic England and on listed buildings.

Net will also carry out the build and are the approved contractors by the Church of England to carry out the works on their buildings. They have done a large number of sites in and around London and have extensive knowledge of working with historic buildings and in particular working on churches.

Additionally the revenue from the installation can be utilised to repair and maintain the church.

## **4.5 National Planning Policy Framework**

This legislation was introduced on 27<sup>th</sup> March 2012 and replaces Planning Policy Guidance notes and Planning Policy Statements.

The legislation was introduced to help to achieve sustainable development, sustainable means ensuring that that we create better lives for ourselves and not creating worse lives for future generations. Development means growth.

In relation to this policy the following paragraphs are relevant in determining this application:

Paragraph 17, "always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

Paragraph 18 "the government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths and to meeting the twin challenges of global competition and of a low carbon future."

Paragraph 20 "To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> century".

In relation to the above paragraphs the site will ensure that there is improved coverage in the area as people now want to use phones and tablets where ever they are. The proposal is of a high design quality and does not blight the host building or the surrounding area.

Paragraph 43 "In preparing local plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the number of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate."

In terms of the above, the proposal utilises an existing building and the antennas are positioned internally within the host building.

An ICNIRP certificate has been submitted as part of the application confirming that the proposal complies with guidelines.

Paragraph 131 "In determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to valuable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

- The desirability of new development making a positive contribution to local character and distinctiveness.

In terms of the above, the church is listed but the proposal will not blight the host building and will provide a valuable rental income which can be reinvested into the church and ensure that the church remains a viable asset to the local community.

Paragraph 188, "Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.

The previous scheme at this site was for 14 antennas, and we consulted with the Local Planning Authority, the ward councillors, and the local school. We received one response from the LPA, asking for a fee to submit formal precon. Due to cost constraints, we did not progress with formal precon. We received no further responses from any other consultees.

As this scheme is for less than was previously proposed, and we received no substantiate responses to the previous consultation, we did not consider it would be necessary to carry out another consultation.

#### **1.4.6 Site Need and Identification**

This site is required to upgrade existing coverage in the area and to provide 4G coverage. Coverage plots are submitted as part of this application.

This cell will improve coverage and capacity in the area around London Zoo and the North East area of Regents Park. The area currently has capacity issues particularly in the summer months due to footfall of visitors and events, which will be alleviated with the introduction of this site.

#### **1.4.7 Alternative Sites**

The following sites were approached but the site providers were not interested in having telecommunications on their buildings:

Kings Court  
Prince Albert Road

34 Prince Albert Road

33 Prince Albert Road

St James Court, Prince Albert Road



60 Ormonde Terrace

6-7 St Edmund Terrace

The church is considered to be the best site as the antennas are internal and utilise an existing building no other alternative sites were available in the search area. The only other alternative would be a number of street work solutions which by their very nature are more visually prominent.

#### **1.4.8 Health and Safety**

We are aware of recent media and press articles concerning Health and Safety issues associated with sites such as this site. We remind you that Government Guidance is given in the National Planning Policy Framework.

The proposal for this site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines and therefore Health and Safety concerns should not be a planning consideration. An ICNIRP certificate is submitted with this application.

#### **1.4.9 Consultation**

The previous scheme at this site was for 14 antennas, and we consulted with the Local Planning Authority, the ward councillors, and the local school. We received one response from the LPA, asking for a fee to submit formal precon. Due to cost constraints, we did not progress with formal precon. We received no further responses from any other consultees.

As this scheme is for less than was previously proposed, and we received no substantiate responses to the previous consultation, we did not consider it would be necessary to carry out another consultation.

#### **1.5 ACCESS**

Access to the site will remain unchanged, as will the on-going traffic visiting the site. We do not envisage additional maintenance visits incurring, and being new equipment, the likelihood of requiring visits for repair is remote.

### **2 CONCLUSION**

The site has been designed to reduce the visual impact of the scheme and to provide improved coverage in this area. The works are all internal and the GRP screening will be painted to exactly match the existing slate louvres.

We hope the above information is sufficient for you to consider this application favourably.