

Our ref. NET/A12482

Date: 25th August 2017

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Chief Planning Officer
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Submitted via the Planning Portal

Dear Sir,

FULL PLANNING APPLICATION FOR THE INSTALLATION OF TELECOMMUNICATIONS EQUIPMENT, COMPRISING THE INSTALLATION OF 4NO. ANTENNAS LOCATED BEHIND REPLICA REPLACEMENT GRP (GLASS REINFORCED PLASTIC) LOUVRES, THE INSTALLATION OF CABINETS INTERNALLY WITHIN THE CHURCH ROOF VOID, AND ANCILLARY DEVELOPMENT THERETO, AT ST GEORGE'S CHURCH, 44 QUEEN SQUARE, HOLBORN, LONDON, WC1N 3AH

We are planning consultants retained by NET to submit planning applications on behalf of Telefónica O2 UK Limited and Vodafone Limited who recently entered into a network sharing agreement. 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).

The development consists of:

"The installation of 4No. antennas located behind replica replacement GRP (Glass Reinforced Plastic) louvres, the installation of cabinets internally within the church roof void, and ancillary development thereto."

Enclosed is the following:

- Drawings A12482 – CTIL – 100, 201, 202, 301, 302, 401, 402, 403, 501, 502 – B
- Application forms
- ICNIRP Certificate
- Planning & Heritage Statement (including design and access statement)
- Coverage Plots
- NET Church Installation Pack
- CTIL General Background Information

GVA is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS.

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- CTIL Heath and Mobile Phone Base Station document
- Cheque for £385 to be posted separately

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.

Yours sincerely,

A handwritten signature in black ink that reads "GVA Grimley". The signature is written in a cursive, flowing style.

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 this proposal. The statement links the general development principles to the final detailed design.

1.1. HISTORY, HERITAGE & BACKGROUND

St George's Church is a Grade II* listed building located in Bloomsbury Conservation Area.

List Name: Church of St George the Martyr

List entry Number: 1245485

Grade: II*

St George's Church was built in 1706 by Arthur Tooley. The church was repaired in the late 18th Century, recast by SS Teulon in 1867-9 and restored in 1952 and 1989. The exterior was almost entirely altered through the work of Teulon. The church is constructed of Stucco with a rusticated lower portion. The tower is located at the west end of the church, and comprises a small square-plan tower with Gothic canopies, a clock, and is surmounted by zinc covered spirelets with louvered gablets.

There is no history of Telecommunications at this site.

The proposed work falls within the Ecclesiastic Exemption (Listed Buildings and Conservation Areas) Order 1994 (as amended) and therefore a Listed Building application under the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) is not required.

The application comprises the installation of 4 antennas located behind replica replacement GRP (Glass Reinforced Plastic) louvres, and the installation of cabinets internally within the church roof void. London Borough of Camden considers that the swap out of the original louvres for GRP constitutes a material alteration to the church, and therefore a full planning application is required.

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).

1.4. The proposal

A proposed scheme has been drawn up for the installation of telecommunications equipment at St George's Church, Holborn. The proposed development comprises:

“The installation of 4No. antennas located behind replica replacement GRP (Glass Reinforced Plastic) louvres, the installation of cabinets internally within the church roof void, and ancillary development thereto.”

London Borough of Camden considers that the swap out of louvres constitutes a material alteration to the church, and therefore a full planning application is required.

1.5 Design Considerations

It is required to swap out the original louvres for GRP, which allows the signal to transmit. The louvres will be replaced by specialist crafts people and will be coloured and textured to exactly replicate the existing louvres. The original louvres will be carefully removed, numbered and carefully stored, so that they can be reinstated should the technology become obsolete. The equipment cabinets will be located internally within the church roof void.

Visually, there will be no external change to the church. The GRP will be crafted to exactly match the existing louvres.

We do not consider that the proposal will have a detrimental impact on the heritage of the listed building or the character of the conservation area, and permission should not be withheld.

1.6 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.

1.7. Local Policy

London Borough of Camden's Local Plan was adopted on 3rd July 2017. It contains the following policies that are relevant in the determination of this application.

Policy D1 – Design

Policy D2 – Heritage

Paragraph 5.10 – **Digital Infrastructure** refers to telecommunications and states that this will allow for enterprise development in the area.

London Borough of Camden's Planning Guidance document on **Design** is also relevant in the determination of this application.

In relation to the above policies and guidance, a sensitive proposal has been drawn up to take into consideration the site's designation as a Listed Building in a Conservation Area. It is not considered that the swap out of the louvres will visually alter the exterior of the church, and 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. Views into and out of the conservation area are not affected, and hence the conservation area is protected.

The site benefits from Ecclesiastical Exemption and the Local Planning Authority will be notified regarding the faculty in due course.

The installation of these antennas will ensure that there is a good telecommunications network in the area which will aid in communication and help with the Governments initiative of connectivity in rural areas.

The revenue from the installation will be paid directly to the church which can be reinvested in the church to ensure that community facilities are protected and enhanced in Local Centres.

There are no masts in the area which are suitable to share however the installation of antennas within the church, which are not visible and utilise an existing building, is considered to comply with Policy.

It is therefore considered that the proposal complies with Local Plan Policy.

1.8 National Policy

National Planning Policy Framework

This legislation was introduced on 27th 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 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 21st 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. The proposed cabinet will be carefully positioned and painted to ensure it does not have a detrimental impact on the area.

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 we consider that 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.

In terms of the above, we consulted with Councillors Awale Olad, Sue Vincent, Julian Fulbrook, Keir Starmer MP, and London Borough of Camden as Local Planning Authority. A detailed account of the preconsultation is outlined in a later section.

1.9. Site Need and Identification

In terms of alternative sites, the following sites were explored but discounted:

Queen Square Imaging Centre, 8-11 Queen Square, London, WC1N 3AR – Discounted due to being a hospital building

Barclay House, 37 Queen Square, London, WC1N 3AR – Discounted due to being a hospital building

National Hospital for Neurology & Neurosurgery, Queen Square, London, WC1N 3BG – Discounted due to being a hospital building

Clinical Neuroscience Centre, 31 Queen Square, London, WC1N 3BG – Discounted due to being a hospital building

13-17 Grenville Street, London, WC1N 1LY – Hospital owned building and site is too short considering taller surrounding buildings

Queens Court, Queens Square, London, WC1N 1LY – Site is too short considering taller surrounding buildings

CIPR Public Relations Centre, 52-53 Russell Square, London, WC1B 4H - Site is too short considering taller surrounding buildings

Hamilton House, 51 Russell Square, London, WC1B 4JU - Site is too short considering taller surrounding buildings

Downing Court, Grenville Street, London, WC1N 1LX - Site is too short considering taller surrounding buildings

UCL Institute of Cognitive Neuroscience, Alexandra House, 17 Queen Square, London, WC1N 3AR – Hospital owned building and site is too short considering taller surrounding buildings

Royal London Hospital for Integrated Medicine, 60 Great Ormond Street, London, WC1N 3HR – Discounted due to being a hospital building

The Imperial Hotel, 61-66 Russell Square, London, WC1B 5BB – No response has so far been received from the landlord to date. It is therefore assumed that the landlord has no interest in the proposal

The President Hotel, Russell Square, London, WC1N 1DB - No response has so far been received from the landlord to date. It is therefore assumed that the landlord has no interest in the proposal

The proposed site will form part of an improved upgraded network for CTIL which will allow faster downloading and the reduction in call drop outs.

Coverage - The licence granted to CTIL demands that strict coverage qualities are met. It is essential that the benefits of mobile telephones are available for all the population. The changing customer use of mobile phones also demands that networks and coverage is available at home, in the workplace, while shopping, enjoying leisure activities or while on the move.

Quality - In order to ensure coverage within buildings such as homes, shops, offices etc. the radio signal has to be of sufficient strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, some less than 1 km apart.

Capacity - As the use of and demand for mobile phones has increased the number of sites required to provide Network capacity has increased. Each cell or base station can only handle a finite number of calls so in areas of high use additional cells are required to meet demands on the network and thus avoid existing cells going into congestion.

The radio implication of the site: Radio signals are transmitted through the network by using fixed links at such frequencies that necessitate an uninterrupted line of sight. To achieve this, the installation must reach a sufficient height above surrounding buildings and trees. The installation must also be in a position to provide good in building radio coverage to the target area.

It is for these reasons that it is important to achieve a service of quality for mobile users. The main complaints received by mobile telephone operators about their service relate to the problems associated with dropped calls and no service. As more and more people are using tablets and smart phones there is a need to ensure that existing sites can meet this demand. This is one such site as due to the location of the site there is a high level of traffic to the site and the site needs to be upgraded.

Coverage plots form part of this application and clearly show the need for this site.

1.10. Health and Safety

We are aware of 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.

In 2000, the Independent Expert Group on Mobile Phones (IEGMP – Stewart Report) recommended a precautionary approach to mobile telephony in general and stressed the need for more research. NRPB endorses this approach and its Advisory Group on Non-Ionising Radiation (AGNIR) has just published its findings:

The Operators have studied the science review produced by the Advisory Group on Non-Ionising Radiation (AGNIR) and welcomes the overall view that the evidence does not suggest any adverse health effects from radio frequency exposures at levels below guidelines.

In particular, AGNIR has stated that exposure levels in the vicinity of mobile phone base stations are extremely low and the evidence indicates that they are unlikely to pose a health risk.

AGNIR concludes "In aggregate the research published since the IEGMP (Independent Expert Group on Mobile Phones) report does not give cause for concern." However, it suggests that continued research is needed since mobile phones have been in widespread use for a relatively short time. The operators fully support this view both in principle and contribute to independent, reputable research including the £7.3 million Mobile Telecommunications and Health Research programme. An ICNIRP certificate is submitted with the application.

2.0. CONSULTATION

Consultation was carried out with Councillors Awale Olad, Sue Vincent, Julian Fulbrook, Keir Starmer MP, and London Borough of Camden as Local Planning Authority. No responses have been received to date.

3.0. 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.

4.0 CONCLUSION

It is not considered that the proposal will have a noticeable impact on the host building.

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