

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	The Knights Templar PH	Site Address:	95 Chancery Lane London WC2A 1DT
National Grid Reference:	531123, 181292		
Site Ref Number:	CTIL 145701 TEF 68731	Site Type: ¹	Microcell

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why: N/A – site upgrade.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: N/A – site upgrade.		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	23 January 2018
Name of contact:	Olu Ayinde
<p>Summary of outcome/Main issues raised: Pre-application correspondence was sent to Camden Council on 19 January 2018. A response was received on 23 January confirming a fee of £1,218 would be payable to gain advice on the proposal. In response the following comment was made:</p> <p><i>“Regarding the pre-application fee, please be advised that current Government advice on pre-application advice fees are that they need to be based on cost recovery. A fee of £1,218 for comments on proposed minor works to upgrade of an existing microcell installation is not considered compliant with this or reasonable. This being the case, we will seek a formal determination by way of application and they can close their case.”</i></p>	

¹ Macro or Micro

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: Pre-application consultation letters were sent by email on 15 January 2018 to the Holborn and Covent Garden Ward Councillors, Cllrs. Olad, Vincent and Fulbrook.			
Summary of outcome/main issues raised (include copies of relevant correspondence): No responses have been received.			

School/College

Location of site in relation to school/college (<i>include name of school/college</i>): There are no schools located close to the site.
Outline of consultation carried out with school/college (<i>include evidence of consultation</i>): No consultation has been undertaken.
Summary of outcome/main issues raised (include copies of main correspondence): N/A.

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response: N/A – full application.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	N/A – full application	

3. Proposed Development

The proposed site: The site is an established public house located at the junction of Carey Street and Chancery Lane. The existing installation comprises two small microcell antennas on the Chancery Lane elevation of the building, with ancillary equipment cabinets at the lower ground level on Carey Street. The proposal involves the replacement of the microcell antennas with 2 no. new antennas and the installation of an additional equipment cabinet. The development would allow
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the installation to provide enhanced 3G coverage and new 4G coverage for Telefónica UK Limited (trading as O2).

The host building is Grade II listed and is located within the Bloomsbury Conservation Area.

Type of Structure (e.g. tower, mast, etc):	Microcell installation
Description: The replacement of the existing 2 no. microcell antennas with 2 no. new microcell antennas on the Chancery Lane elevation, the installation of an additional equipment cabinet at lower ground level and development works ancillary thereto.	
Overall Height:	5.0 metres (to base of antenna)
Height of existing building (where applicable):	N/A
Additional Equipment Housing:	
Length:	0.6m
Width:	0.6m
Height:	2.0m
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	N/A
Equipment housing – type of material and external colour:	Steel with a grey finish.

Reasons for choice of design, making reference to pre-application responses:

In designing the proposed scheme, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.

There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

In all aspects of the design now put forward the smallest practical components have been utilised to ensure that the visual impact of the development is kept to the absolute minimum. The replacement antennas are needed because the existing antennas can't provide the enhanced coverage. The replacement antennas would also be coloured to match the fascia of the building, ensuring the same minimal impact as the current development.

An additional equipment cabinet is also required, for the radio equipment needed to provide the enhanced coverage. This is proposed to be located on the lower ground level, adjacent to the existing cabinets. The location of the additional cabinet would ensure no detrimental impact on the host building or surrounding area.

It is considered the proposed equipment is appropriately located. It has been possible to devise a scheme which has a minimal additional visual impact. The design would result in a less intrusive facility than other designs, therefore preserving the character and appearance of the area. It is further considered the proposal strikes an appropriate balance between operational and environmental considerations, and the impact of the development would be outweighed by the significant public benefit of the proposal.

Technical Information

	Yes	No
<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)</p> <p>International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.</p> <p>When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, Telefónica UK Ltd operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of Telefónica UK Ltd's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.</p> <p>The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.</p>		

4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

Reason(s) why site required e.g. coverage, upgrade, capacity

The proposal would provide Telefónica with enhanced 3G coverage and new 4G services to the surrounding area. It would provide localised coverage and link with sites in neighbouring cell areas to form part of the national network.

In addition to the voice and texts services available with 3G coverage, 4G (also known as LTE) will allow users of the network to benefit from ultra-fast speeds when browsing the internet, streaming videos, or sending emails wherever they are. It also means faster downloads on the go.

The importance of mobile technology in the UK, and its contribution to the sustainability agenda is emphasised in a series of annual communication market reports published by OFCOM, 'The Communications Market' (<http://stakeholders.ofcom.org.uk/market-data-research/market-data/communications-market-reports/cmr16/>). The 2016 report states:

'The communications market plays a crucial role in the lives of citizens and consumers, and the fast-paced nature of the market means that this role is ever-changing.

We all need high-quality communications. In the modern world, a huge amount of our time is spent using communications services: for work, to stay in touch with family and friends, and in order to go about our daily lives. Our ability to access and use reliable mobile and broadband connections has become fundamental to the way we work and live, and to the ability of businesses of all sizes to thrive. For many people, internet connectivity is now as essential as gas or electricity, and access to traditional television, radio, fixed phone lines and postal services continue to remain important.

4G take-up has increased to 48% of UK adults (from 30% in 2015) while 4G mobile services are now available to 97.8% of UK premises. And 37% of fixed broadband connections are providing actual speeds of 30Mbit/s or more, up from 30% in 2014. In total, 86% of UK adults now have internet access at home. The greater choice of where and how to access the internet is driving greater use of online services. The smartphone, in particular, is becoming an ever more important device for many consumers, and take-up of this device has increased again this year. Seventy-one per cent of all adults now own a smartphone, up from 66% in 2015.

The growth of 4G has been rapid. 4G mobile services are now available to 97.8% of UK premises (outdoor coverage from at least one operator) in June 2016. 4G accounted for almost half of all mobile subscriptions (46%, 39.5 million connections) in Q4 2015, compared to 28%, 23.6 million, in 2014.'

It is therefore very important for 'mobile only' households that live and work and any businesses that operate in this part of the LPA's area, together with visitors and others who are staying in or travelling through the area, that the necessary indoor RF coverage is provided to enable them to have satisfactory mobile telephony and internet access, and thereby help achieve the Government's objectives for inclusive development and the rollout of modern high-speed communications networks.

The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

It is for these reasons that the National Planning Policy Framework places such emphasis on encouraging the continued rollout of high-speed digital infrastructure networks, of which the proposed development will form a key part.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.

5. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

Site	Site Name and address	National Grid Reference	Reason for not choosing
			N/A

If no alternative site options have been investigated, please explain why:

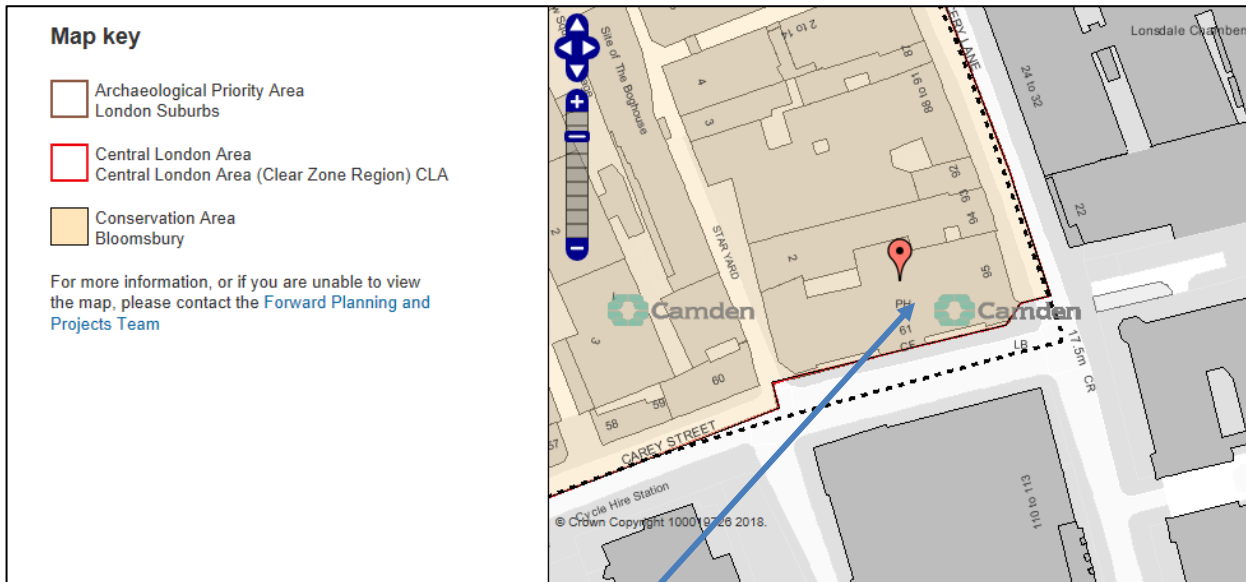
No alternative site options have been investigated as the proposal involves a minor upgrade of an existing installation.

Environmental Information (refer to Section 2 of Site Finder Report):

As far as practicable the upgrade has been designed to keep to a minimum the impact of the development on the surrounding area, specifically because the host building is Grade II listed and within the Bloomsbury Conservation Area. The replacement antennas coloured to match the building, and location of the additional cabinet out of main views of the building, ensures there would be no harm to either the host building or its wider setting.

A check of the Environment Agency website has confirmed the site is within an area with a low probability of flooding.

Land use planning designations:



Site location

The above map is taken from the Council's Planning Policy map. It confirms the site is located within the Bloomsbury Conservation Area.

Additional relevant information (planning policy and material considerations):

VISUAL IMPACT AND APPEARANCE

An upgraded installation is required to provide enhanced coverage to the area for Telefónica. The site would provide enhanced 3G and new 4G coverage for Telefónica.

It is considered that the proposal utilises the most suitable design available to meet coverage demands. It is important to keep the impact of telecommunications development in the area to a minimum and it is considered this proposal achieves this. The substantial benefits of the proposal also have to be considered. Both 3G and 4G coverage would be provided for Telefónica from the site. It is considered the benefits of the proposal significantly outweigh the minimal additional impact on the surrounding area. The character and appearance of the area would be preserved.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2012) (NPPF)

The NPPF, which came into force on 27 March 2012, has replaced PPG8 in terms of national policy specifically relating to electronic communications development.

Paragraph 14 states *'At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. ...*

'For decision taking this means:

- *approving development proposals that accord with the development plan without delay; and*
- *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- *specific policies in this Framework indicate development should be restricted.*

Unless material considerations indicate otherwise.'

Included within the core planning principles to be taken into account in paragraph 17 are the following relevant points:

- *planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;*
- *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- *support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);*
- *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;*

Paragraph 21 advises LPA's to *'plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;'* and

paragraph 29 recognises that *'Smarter use of technologies can reduce the need to travel.'* The proposed development will facilitate both 3G and 4G technology for Telefónica, allowing for home working and which can reduce the need to travel, thus contributing to the sustainability agenda. Heritage assets would be preserved by the sensitive design of the upgrade.

Leading on from this, Section 5 of the NPPF addresses supporting high quality communications infrastructure. Paragraph 42 sets out that *'Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.'*

It has already been noted that Paragraph 43 advises that *'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 this instance it is proposed to enhance coverage to the area by utilising an existing installation. There would be an increased visual impact, however this would be minimal with replacement antennas and an additional cabinet proposed.

Paragraph 44 emphasises that LPAs *'should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development.'* It sets out that LPA's *'should ensure that:*

- *they have evidence to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*

The European Commission has issued a directive (2004/108/EC) governing all forms of electronic equipment regarding the interference that such equipment produces and, in turn, its immunity to interference from outside.

Any equipment compliant with that directive, such as that proposed in this application, is unlikely to suffer or cause interference. However, if there is a complaint of interference to domestic radio and television, in the first instance the BBC will assist, via the BBC Help Receiving TV and Radio web site at: <http://www.bbc.co.uk/reception/>. If, following investigation, there is evidence of interference, the operator will ensure any issues associated with their equipment are addressed. For any other types of interference, OfCom will investigate.

Finally, Paragraph 46 clarifies that LPA's *'must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure.'*

The site has been designed to be fully compliant with the precautionary ICNIRP guidelines (confirmation included in the ICNIRP certificate) thus the only remaining considerations must be planning related, specifically in this case siting and design, both of which are considered

wholly appropriate given the use of an existing facility mitigation of visual impact as discussed in the preceding subsection.

The proposal outlined within the document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plan for Camden Council, relevant to the proposal, comprises:

- The London Plan: Spatial Development Plan for Greater London;
- The Camden Local Plan (2017).

These are discussed below:

The London Plan

The London Plan sets out the Mayor's planning strategy for Greater London and contains strategic thematic policies, general crosscutting policies and more specific guidance for sub-areas within the Metropolitan Area. In Paragraphs 1.38-1.41 'Ensuring the infrastructure to support growth', the Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks, that London requires to secure its long-term growth.

It is considered that the applicants' network is an integral element in securing the Mayor's vision for the delivery of modern communications networks across London. More specifically, the proposed development is entirely consistent with and will help to implement the strategic objectives contained in Policy 4.11 'Encouraging a Connected Economy' of the Plan, which states that:

A. The Mayor and the GLA Group will, and all other strategic agencies should:

a. facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive broadband access meeting the needs of enterprises and individuals.

b. support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits."

At paragraph 4.55 of the supporting written justification to policy 4.11, the Mayor "wishes to ensure sufficient ICT connectivity to enable communication and data transfer within London,

and between London, the rest of the UK and globally” and “...support ubiquitous networks – those supporting use of a range of devices to access ICT services beyond desk-based personal computers..” Furthermore, at paragraph 4.57, the Mayor states the intention to “...support competitive choice and access to communications technology, not just in strategic business locations but more broadly for firms and residents elsewhere in inner and outer London, and to address e-exclusion amongst disadvantaged groups.”

Policy 4.11, and its written justification, is clearly supportive of the proposal and the role that it will perform allowing Telefónica to provide continued and enhanced coverage to the surrounding area.

Local Plan

There are no policies relating directly to telecommunications development within the Camden Local Plan. General policies of relevance include D1 (Design) which requires a high standard of development, and policy D2 (Heritage). This policy aims to preserve and enhance Camden’s heritage assets, including conservation areas and listed buildings. Development within conservation areas is required to preserve or enhance the character or appearance of the area.

It is considered the proposal complies with both policies. The scheme has been specifically designed for this location. The replacement antennas would not result in any material change to the external appearance of the building and the additional cabinet would have a minimal additional impact with it proposed to be set down at the lower ground floor level. The additional impact would not be sufficient to cause harm to the host listed building or the character or appearance of the conservation area. The minimal impact of the development would be outweighed by the public benefits of the proposal.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy the proposal is sympathetically designed, it minimises the number of installations and has a high quality of design. It would enhance the provision of local community facilities and services and would preserve heritage assets.

HERITAGE STATEMENT

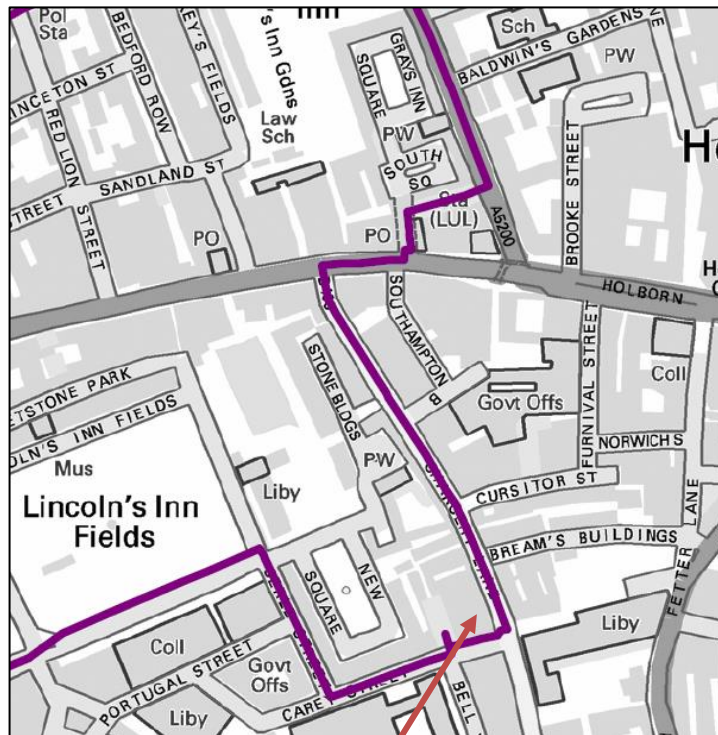
The host building is a Grade II listed building and is located within the Bloomsbury Conservation Area. It is noted there are several other listed buildings in the surrounding area.



The list entry of the building, taken from the Historic England website states:

“Bank. 1865 by F.W. Porter, built as the Union Bank of London. Portland stone, slate roof. Stately, richly detailed High Renaissance design. 3 storeys, basement and dormered attic. 4 window wide frontage to Chancery Lane, splayed corner entrance bay and 12-window wide front to Carey Street with central and terminal advanced pavilions. Aediculed corner entrance. 3 storey loggia treatment to Chancery Lane with semicircular arched windows contained within successive Tuscan, Ionic and Corinthian orders in coupled columns. The Carey Street front has the same theme but with coupled pilasters. Arcaded 1st floor windows. Terminal pavilions as loggias. The central pavilion 2 storeyed with stone ball finials to cornice blocking course. Heavy main cornice and entablature with semicircular, pedimented dormers above. Fine heavy cast iron area railings. Original banking hall with rich Renaissance detailing, largely intact.”

The host building is located on the southern boundary of the Bloomsbury Conservation Area. The area covered by the designated area close to the site is shown on the plan below, with the site location annotated. It is noted the site lies on the Camden boundary with the City of Westminster and the City of London. There are also Conservation Areas to the south and east of the site.



Site location

In terms of heritage assets, the NPPF notes the following:

'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 viable 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.*

'132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. ...'

The proposal will maintain the character and appearance of the conservation area and listed building, and will not compromise the contribution the conservation area makes to the area, nor the area's local distinctiveness. It is considered to comply with the requirements of this aspect of the NPPF. Only the small microcell antennas on the building will be visible. As these are replacement antennas there would be no additional impact. The cabinet may be visible when walking along the pavement on Carey Street, however it would not be widely visible, therefore not cause harm to the host building or the wider conservation area setting. This is considered to be an innovative design solution that is an entirely suitable development given the context of the site.

Given the proposed development is to provide continued and enhanced coverage for Telefónica in the public interest, and the careful and appropriate siting and design, the scheme will maintain the character and appearance of the area and the qualities of the listed building, and will not compromise local distinctiveness, to comply with the requirements of this aspect of the NPPF and with paragraph 134, which requires that where there is less than substantial harm, as there is in this case, it should be balanced with the public benefits of the proposal, which in this case are substantial and have been discussed earlier. Thus the requirements of the tenth core planning principle addressing the appropriate conservation of heritage assets have been adhered to.

The proposal represents good design and would have a less than substantial impact on the conservation area and listed building. It is supported by the guidance contained in paragraph 65 of the NPPF, which states that 'Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).'

Thus the requirements of the fourth core planning principle under 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;*' are achieved.

The limited impact is considered to be outweighed by the continued provision of high quality modern communications networks, in the wider public interest.

The proposal, a well-designed, upgraded installation which will have a minimal impact on the conservation area and listed building, where there will be no destruction of heritage assets, is in complete accordance with Part 5 of the Delivering Sustainable Development section of the NPPF as well as those sections dealing with design and heritage. It will allow the operator to continue to provide coverage, which will enable continued access to services in the wider public good which support ways of working which deliver wider planning, sustainability and quality of life benefits, is in complete accordance with the NPPF. The proposed installation has also been shown not to compromise the aims and objections of local planning policy.

Summary


National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. The upgrade to this existing site is proposed to provide enhanced coverage to the surrounding area for Telefónica.

A simple design solution is proposed to mitigate visual impact and prevent harm to the local environment, by the use of small microcell antennas coloured to match the building, and with the additional cabinet at the lower ground level. The minimal additional impact of the development would be outweighed by the substantial benefits of improved coverage to the area for Telefónica.

The proposed development is compliant with the relevant policies from the NPPF and Development Plan, as outlined within this supporting statement.

The proposal is fully compliant with ICNIRP guidelines and declaration of compliance has been provided.

Confirmation that submitted drawings have been checked for accuracy

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Signed:		Date:	20 February 2018
Position:	Planning Department	Company:	Waldon Telecom Ltd
		(on behalf of CTIL and above operator)	