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Ref: St Mary All souls

21st July 2021

Chief Planning Officer
Camden Council
5 Pancras Square,
Kings Cross,
London
N1C 4AG

Dear Sir or Madam,

FULL PLANNING APPLICATION FOR THE INSTALLATION OF TELECOMMUNICATIONS EQUIPMENT AT ST MARY WITH ALL SOULS, PRIORY ROAD, SOUTH HAMPSTEAD, LONDON NW6 4SN.

We are planning consultants retained by NET to submit planning applications on behalf of Telefónica O2 UK Limited and Vodafone Limited who entered into a network sharing agreement. These arrangements will be overseen by Cornerstone Telecommunications Infrastructure Ltd (Cornerstone) which is a joint venture company owned by Telefónica UK Limited and Vodafone Limited.

This agreement allows both organisations to:

- pool their basic network infrastructure, while running two, independent, nationwide networks
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development

"The installation of 1 No. antenna located behind replacement Glass Reinforced Plastic (GRP) louvres, 1 No. GPS module mounted on south east face of tower and ancillary development thereto"

Enclosed is the following:"

- No fee required resubmission within 12 months.
- Drawings 14839224- 100,200,201,300,301,302,303,304,305,306,307,308,405 A pack issue A.
- Application forms
- ICNIRP Certificate
- Planning and Heritage Statement (including design and access statement)

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@avisonyoung.com

Yours sincerely,

[redacted]

Avison Young
International Property Advisors

1. PLANNING, HERITAGE DESIGN AND ACCESS STATEMENT

The following heritage 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, BACKGROUND AND HERITAGE

A previous scheme was submitted to the council under reference 2020/1332/P and was later withdrawn, this application proposed 7 No. antennas in total. This revised scheme reduces the number of antennas to 4 in total and are contained in the upper windows only.

This proposal relates to the upgrade of telecommunications equipment at **ST MARY WITH ALL SOULS, PRIORY ROAD, SOUTH HAMPSTEAD, LONDON NW6 4SN**. The site is Grade II listed and is located within Priory Road Conservation Area.

The church is located on the corner of Abbey Road and Priory Road. The area is residential in nature comprising of 3 and 4 storey terraces, 2 storey mews houses and tower blocks.

The church is a Grade II listed building as is the adjacent church hall.

Historic England has the following information on the site:

Location

Statutory Address:

CHURCH OF ST MARY AND ATTACHED WALLS, PIERS AND GATES, PRIORY ROAD

The building or site itself may lie within the boundary of more than one authority.

County:

Greater London Authority

District:

Camden (London Borough)

National Grid Reference:

TQ 25670 84018

Details

CAMDEN

TQ2584SE PRIORY ROAD 798-1/59/1352 (East side) 14/05/74 Church of St Mary and attached walls, piers and gates

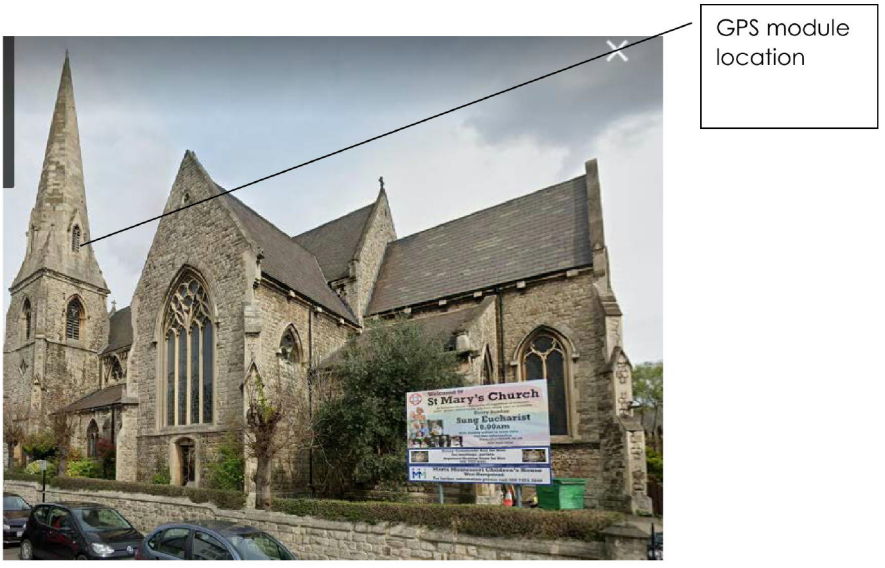
GV II

Church. 1856-62. By FJ and Horace Herbert Francis. Coursed Kentish ragstone with Bath stone dressings. Slated roof. Sanctuary with southern chapel and northern vestry, transepts, 4-bay nave with clerestory and lean-to aisles, and south-west tower. Middle-pointed Gothic style. EXTERIOR: entrances in south side of tower and west end with moulded pointed arches on colonnettes and double doors. Tower has diagonal buttresses, clock on south face, louvred belfry openings and broach spire with lucarnes. 5-light east and west windows; 4-light transepts. Aisles with corbel table. Clerestory with unusual 3-light windows under shallow gables linked to pilasters flanked by colonnettes; Lombard frieze. INTERIOR: not inspected but noted to have a fragment of an early C15 brass, being a nun's head, possibly Emma de St Omer the prioress, set in the north transept. Stained glass in chancel by Clayton and Bell; memorial window in north aisle commemorating RJ Pitcher, organist and Professor of Singing at the Guildhall School of Music who invented a device called the Techniquer to help novice organists

master the pedals. SUBSIDIARY FEATURES: attached ragstone walls with gate piers and cast-iron gates to entrances. HISTORICAL NOTE: built on the assumed site of the nunnery of Kilburn. (RCHME: London, Vol. II, West London: 1925-: 39).

Listing NGR: TQ2567084018

Below shows the site and the neighbouring listed building (St Marys Hall) which are shown as blue triangles on the map.



The site when viewed from Abbey Road looking north west.

Site when viewed at the junction of Priory Road and Abbey Road.

The proposed works 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 as this will be done through the Faculty process. You may be consulted separately pursuant to the Faculty Jurisdiction Rules 2013 in relation to this proposal.

NET has worked closely with the churches for over 15 years and is aware of the protocols of digging within the grounds of a church and respect the sensitivity that this entails. The faculty application also has measures in place to ensure that all works are respectful of the potential of unearthing archaeological artefacts.

Where the louvres are to be replaced with GRP, the original louvres will be stored and can be reinstated if the telecommunications equipment becomes obsolete which is part of the faculty approval.

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 Cornerstone

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 (Cornerstone).

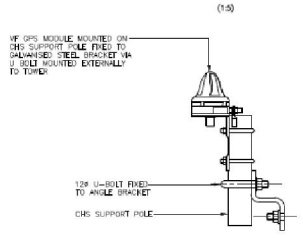
1.4. The proposal

A proposed scheme has been drawn up for the upgrade of the existing telecommunications equipment at St Mary with All souls, Priory Road, South Hampstead London NW6 4SN.

It is proposed to install 1 No. antennas located behind replacement Glass Reinforced Plastic (GRP) louvres, 1 No. GPS module mounted on south east face of tower and ancillary development thereto.

Planning permission is required for the works, the listed building element will be undertaken by Faculty under the Ecclesiastical exemption route.

The GPS module is very small in scale measuring, 68mm high and 98.5mm deep. As shown in the details below.



ELEVATION ON VF GPS MOUNTING
(1:5)

The Node will be positioned within the louvered windows but has to have a clear line of sight to the sky to receive satellite information.

The louvres will be replaced on a like for like basis. The louvres have to be replaced with Glass Reinforced Plastic (GRP) which allows the signal to transmit. The GRP can be moulded and coloured to exactly replicate the existing.

The louvres are slate and will be replaced with GRP to exactly match the existing.
Below is an example of GRP moulded to simulate slate.

The works will be carried out by specialist crafts people to ensure that the fabric and integrity of the building is not harmed.

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 as this will be done through the Faculty process. You may be consulted separately pursuant to the Faculty Jurisdiction Rules 2013 in relation to this proposal.

1.5 Design Considerations

The GPS module will be located at more than 21 metres in height at louvre level and will not be overly prominent due to its small scale. The module has to be positioned so that it has a clear view of the sky and is able to receive satellite information. The louvres will be replaced as per the other louvres and will not have negligible visual impact on the church and the surrounding area.

1.6 Planning Policy Considerations

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

Camden Council's Local Plan was adopted on 3rd July 2017. It contains the following policies which are relevant in the determination of this application. Policy E1 – Economic Development, D1 Design, D2 heritage.

In relation to Policy E1 - Economic Development, the proposal is to upgrade an existing site to provide improved coverage in an area which is highly residential and has a high footfall. This proposal is therefore in compliance with this policy and can contribute to economic development in the area, and also complies with the spirit of the NPPF. The proposal complies specifically with **Part h** of the policy by allowing for the provision of high speed digital infrastructure.

The code of best practice for mobile network development 2016 in paragraph 5.4 states:

"In terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5 percentage points in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade".

This site will therefore promote economic development in this area.

In relation to **Policy D1 - Design**, the site has been sensitively designed with the majority of the equipment being located internally within the church. The only external element is the GPS module which is small in scale and is located more than 21 metres above ground level.

The changes proposed are very minor it is considered that the works are negligible given the public and economic benefit that the good telecommunications network will provide in this busy area of London.

Policy D2 - Heritage promotes the preservation and enhancement of the conservation area and listed buildings. In relation to this policy, it is not considered that the swap out of the louvres for GRP will have a detrimental impact on the heritage of the church.

The proposed GPS module is small in scale and will not be overly visible. The site benefits from Ecclesiastical Exemption and the LPA will be notified regarding the faculty in due course. There is no harm caused to the historic building as the works will be carried out by specialists who have a track record of working with Historic England and listed buildings. The original louvres will be logged, numbered and stored so that they can be reinstated should the need for the equipment become redundant.

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

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

Conservation area appraisal - The site is located within Priory Road Conservation area, the church is identified as a focal point in this area. The works proposed will not have a visual impact on this landmark building to the detriment of the conservation area due the works being all internal and the node being small in scale.

Digital Camden

The Digital Camden document sets out Camden Council's aims and objectives with regards to the delivery of digital infrastructure in the area. This site will allow for a sufficient level of coverage to be provided within the area by improving coverage, which in turn will allow for better access to mobile technology.

London Plan

The current 2016 Plan is still the adopted Development Plan, but the Draft London Plan is considered to be a material consideration in planning decisions and holds limited weight in the determination of applications.

The 2016 Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks that London requires to secure its long - term economic growth.

The Draft London Plan contains Paragraph 1.0.8 which states "Planning for a 'smarter' city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners." The equipment provides digital connectivity which is of a public benefit to both Londoners and visitors to the area.

Paragraph 1.4.11 states "The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processed, opening up new markets and allowing more flexible working."

This upgraded site will ensure that the level of connectivity in the area is sufficient to meet the rising demand of reliable data and digital services by the public.

Policy SI6 - Digital connectivity infrastructure is split into 4 parts. In relation to the proposed installation the following parts are relevant:

3A) The site will ensure that there will be no reduction in mobile connectivity in the surrounding area as the existing level of coverage will be improved.

The site will be an integral element in securing the Mayor's vision for the delivery of modern communications networks across London.

London Infrastructure Plan 2050 – Update

Chapter 8 - Digital connectivity states that digital connectivity is vital and essential for businesses and citizens to take part in modern society. The upgrade of this site will allow for a sufficient level of connectivity to be continued within the area, thus keeping businesses and citizens at a technological advantage.

National Infrastructure Commission Report – Connected Future

The National Infrastructure Commission (NIC) was asked to advise government on the steps the UK should take in order to become a world leader in the deployment of 5G mobile telecommunications networks, and ensure that the UK can take early advantage of the applications those networks may enable.

The Commission's central finding is that mobile connectivity has become a necessity. The market has driven great advances since the advent of the mobile phone. But Government must now play an active role to ensure that basic services are available wherever we live, work and travel, whilst our roads, railways and city centres must be made 5G ready as quickly as possible.

Recommendation 4: States,
"Local Government should actively facilitate the deployment of mobile telecoms Infrastructure"

This proposal is part of the mobile network and is required to provide mobile coverage and connectivity in this busy residential and commercial area.

Paragraph 3.4

"These issues need to be addressed to enable widespread provision and adoption of various future services in the UK, with high quality mobile access where people live, work and travel. Addressing coverage issues now will provide the infrastructure platform on which successive generations of mobile technology will sit, be they 5G, 6G or next generation Wi-Fi."

This upgrade to this site is an important part of this ethos and will provide good mobile coverage where people live and work and carry out recreational activities.

Code of Best Practice for Mobile Network Development – June 2016

The Code of Best Practice was developed by a Working Group consisting of representatives from many organisations, including Mobile UK (on behalf of the Mobile Network Operators), the DCMS and DEFRA, and Historic England.

Of particular interest are Sections 4.3 and Section 5.

Section 5 explains how Mobile Connectivity in the 21st Century is now an imperative part of everyday life. People now choose to access the Internet using their mobile device over connecting to fixed broadband networks. This Section stresses the importance of good connectivity to improve the economy, to promote social inclusion, to deliver public services such as NHS reminders by text message and to promote sustainability (by enabling home working). The proposed upgrade of this site will improve capacity and coverage, which will allow more people to access the network in this busy locality. This will subsequently improve the above factors and provide accessibility to more customers.

1.8 National Policy

National Planning Policy Framework

This legislation was formally adopted in July 2018 and replaces the previous version which was introduced in 2012.

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

Section 6 – Building a strong, competitive economy
Section 10 – Supporting high quality communications
Section 12 – Achieving well-designed places
Section 16 – Conserving and enhancing the historic environment

The following paragraphs need to be considered in relation to this policy:

Paragraph 80 – "significant weight should be placed on the need to support economic growth and productivity.. this is particularly important where Britain can be a global leader in driving innovation."

Paragraph 112 – "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution)"

This proposal is an upgrade of an existing site and therefore is in line with this policy of upgrading existing sites where possible. The site is therefore in compliance with National policy and ensures the continued provision of high quality digital infrastructure in this busy locality.

Paragraph 113 "The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers……, use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged."

In relation to this, the installation is to provide upgraded coverage and utilises an existing building, therefore keeping the number of sites to a minimum.

Paragraph 114 – "Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:

a) They have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and
b) They have considered the possibility of the construction of new buildings or other structure interfering with broadcast and electronic communications services."

Paragraph 115 - "Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

a) The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and
b) For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or
c) For a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

In relation to this paragraph, the proposal complies with policy. The proposal utilises an existing building and will provide upgraded coverage. An ICNIRP certificate accompanies this application.
Paragraph 124 - "Good design is a key aspect of sustainable development creates better places in which to live and work and helps make development acceptable to communities."

In relation to this paragraph the antennas are all internal only the small GPS antenna is located externally but being small and mounted more than 21 metres above ground level will have a negligible impact on the church and surrounding area.

The public benefit of mobile connectivity is apparent in our everyday lives. Connecting to the Internet via a mobile device allows people to access a wide range of central and local government services; to do research for a school project; to manage their bank account and pay bills etc. Good mobile connectivity is also vital to the business sector and can entice businesses into an area. The upgraded site ensures that there is good mobile connectivity in the area and outweighs the negligible harm to the listed building and conservation area.

1.9. Site Need and Identification

This upgraded site is required to provide improved coverage to this area.

In the assessment of this application, material weight should be given to the public benefits that will be provided to local residents and visitors in this area. The site will form part of an improved coverage network which will allow for faster download speeds and fewer calls to the dropped.

Coverage
The licence granted to Vodafone and Telefonica demands that strict coverage qualities are met nationwide. It is essential that the benefits of mobile phones are available across the population. Mobile networks are constantly reviewed to ensure that there is adequate coverage and capacity to

meet customer demands. In the current environment there is an expectation for signal coverage to be available at home, in the workplace, while shopping, enjoying leisure activities or in transit.

Quality
In order to ensure there is sufficient coverage within buildings such as homes, shops, offices etc. the radio signal has to be of adequate strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, which are sometimes less than 1 km apart. The improvement of 3G and 4G signal in this area will encourage economic advancement in accordance with the NPPF which seeks to develop connected environments.

Capacity
The increase of telecommunications masts across the country in recent years is an inevitable consequence of the continued growth of mobile phone usage. More sites are required to accommodate the increasing demands of each mobile user for tasks such as video or music streaming. Each cell or base station is limited to handling a finite number of calls meaning that areas of high usage will require additional cells to meet network demands and avoid 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 strong radio coverage to the target area that can also be received inside buildings.

The radio planning tool identifies deficiencies in the network and predicts the location from which the optimum coverage will be provided. This area is referred to as the search area or cell centre.

The identification of poor coverage areas are often from customer led demands through complaints of dropped calls and reduced services. The proposed installation subject to this application stems from this process where it is imperative for mobile operators to provide high quality coverage to its customers. This is achieved through the improvement of existing network infrastructure and introduction of new base stations to fill in blank spots.

1.10 Site selection

The applicant has adopted a sequential approach to site selection which is encouraged in the Code of Best Practice for Mobile Operators and the NPPF. Efforts have been made to utilise existing telecommunications sites wherever possible to prevent the proliferation of base stations. In this instance an existing site is being upgraded.

This is an upgrade of an existing site and therefore no alternative sites have been considered.

1.11. Health and Safety

There are about 1400 peer-reviewed publications on the biological and health effects of radiofrequency (RF) signals, which are used in mobile communication technology. The scientific community have collated, summarised and assessed these publications in research reviews, the most influential in the UK being the Stewart Report (Mobile Phones and Health) by the Independent Expert Group on Mobile Phones under the chairmanship of Professor Sir William Stewart. These research reviews are used by Governments to develop policy on exposure to radio frequency signals.

Published in May 2000, the Stewart Report concluded that the balance of evidence did not suggest that exposures to radio frequency fields below international guidelines could cause adverse health effects, although it acknowledged that biological effects might occur below these values. The report stressed, however, that a biological effect does not necessarily mean a negative impact on health. Walking, drinking a glass of water or listening to music all produces biological effects.

Since 2000, over 30 further reviews have been carried out, carefully considering many hundreds of pieces of research. Most have made similar recommendations and have come to similar conclusions: that research should continue to address any gaps in the knowledge; and that overall, the possibility of adverse health effects from mobile communications remains unproven.

Further, the reviews stress that exposures from base stations (or masts) are, in the words of the National Radiological Protection Board (now part of Public Health England), "extremely unlikely to cause any effects on biophysical grounds." [A Summary of Recent Reports on Mobile Phones and health (2000-2004), NRPB, Jan 2005]

In June 2011 the World Health Organisation (WHO) noted that "A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use." WHO factsheet 193: Electromagnetic fields and public health: mobile telephones. In April 2012 the independent Advisory Group on Non-ionising Radiation (AGNIR) published a report entitled "Health Effects from Radiofrequency Electromagnetic Fields". This report concluded that there is no convincing evidence that mobile phone technologies cause adverse effects on human health. AGNIR also found that although a substantial amount of research has been conducted, there is no convincing evidence that RF field exposure below the internationally agreed guideline levels applied in the UK causes health effects in adults or children.

In addition, the International Commission on Non-Ionizing Radiation Protection reviewed its guidelines in 2009 and concluded "*ICNIRP reconfirms the 1998 basic restrictions in the frequency range 100 kHz-300 GHz until further notice.*" ICNIRP statement on the "Guidelines for limiting exposure to time-varying electric, magnetic and electromagnetic fields (up to 300 GHz)".

Research reviews are used by guideline setting bodies and Governments to develop advice and public policy on exposure to the signal used by mobile communications technology.

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 is submitted with this application.

2.0. Consultation

Consultation was carried out with the Local Planning Authority, ward councillors, MP and St Mary's School for the initial application. As there were no responses to the previous consultation, no further consultation has taken place for this scheme which reduces the number of antennas.

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

There is very little visual impact on the area or the church as a result of this proposal due to the equipment being internal apart from a small GPS module. The upgraded site will be valuable in the Government's desire of connectivity and ensuring that users can connect to the network wherever and whenever required. It is considered that the proposal complies with national and local policy.

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