

Background Papers

Representations

Online 04/01/2018 Nigel Baker, Thomson Foundation
Online 08/01/2018 [REDACTED]
Online 08/01/2018 [REDACTED]
Email 09/01/2018 Hubert Picarda
Online 09/01/2018 Denise McFarland Cruickshanks
Online 09/01/2018 Michael Levenstein
Online 09/01/2018 Francis Barlow
Online 09/01/2018 Michael Huntington
Online 09/01/2018 Eleanor Attwood
Letters 12/01/2018, 22/02/2018 Tim Bacon, Colville Estate Properties Ltd

From: PLN - Comments
Sent: 04 January 2018 15:03
To: PLN - Comments
Subject: Comments for Planning Application 17/00878/FULL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 3:01 PM on 04 Jan 2018 from Mr Nigel Baker.

Application Summary

Address: 46 - 47 Chancery Lane London WC2A 1JE
Proposal: Installation of telecommunications equipment at roof level comprising nine antennae, one transmission dish, three cabinets, and associated ancillary development.

Case Officer: Gideon Stothard

[Click for further information](#)

Customer Details

Name: Mr Nigel Baker
Email: [REDACTED]
Address: 46, Chancery Lane, London London

Comments Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Reasons for comment: - Noise
- Residential Amenity
Comments: We are the Tenant at the lower ground and fifth floors of 46 Chancery Lane. We have examined the Planning Application and strongly object to it on the following grounds:-

1. If the Planning Application were to be granted, this would be a clear departure from the conditions imposed by Planning Permission 10/00407/FULL dated 10 August 2010. Condition 7 thereof states that there must be no "telecommunications equipment [installed] above the top storey" to "ensure a satisfactory external appearance" of 46/47 Chancery Lane. This is in accordance with the City of London's Unitary Development Plan 2002 ("UDP"),: UTIL 3, ENV 28 provisions which control the development of telecommunications equipment on buildings in conservation areas. We see no reason at all why a condition which was imposed seven years ago in accordance with the UDP should now be overturned.

2. As stated above, 46/47 Chancery Lane is in a conservation area. The City of London's "Local Plan 2015" states that "development in conservation areas

✓ Tick taken out

will only be permitted if it preserves and enhances the character or appearance of the conservation area" (point 3.12.9). Furthermore, if an existing building within the conservation area is to be altered, then developers must consider a wide range of architectural and visual factors, including "the size and shape of the building" and "existing street patterns" (point 3.12.10).

The City of London's "Character Summary and Management Plan" (the "Plan") for the Chancery Lane conservation area sets out in great detail the area's distinctive architectural character and rich heritage. For example, p.9 of the Plan refers to a "long sequence of historic frontages along the side of Chancery Lane" whilst p.40 refers to the area's "strongly legal and educational bearing". We believe that installing telecommunications equipment as described in the Planning Application will be detrimental to the appearance and character of this part of the Chancery Lane conservation area.

If this application is to be decided by councillors, please take this as notice that I would like to speak at the meeting of the committee at which this application is expected to be decided.

Nigel Baker

Chief Executive
THOMSON FOUNDATION

From: PLN - Comments
Sent: 08 January 2018 22:58
To: PLN - Comments
Subject: Comments for Planning Application 17/00878/FULL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:56 PM on 08 Jan 2018 from [REDACTED]

Application Summary

Address: 46 - 47 Chancery Lane London WC2A 1JE
Proposal: Installation of telecommunications equipment at roof level comprising nine antennae, one transmission dish, three cabinets, and associated ancillary development.
Case Officer: Gideon Stothard

[Click for further Information](#)

Customer Details

Name: [REDACTED]

Email:

Address: [REDACTED]

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments:

[REDACTED]

Lincoln's Inn and the surrounding area are an asset to the City of London, containing many listed buildings. There has recently been a substantial amount in the area, particularly on Chancery Lane. The property at 46 - 47 Chancer Lane has been renovated in a very sympathetic way and I am impressed with the appearance of the building at the moment. In my opinion, the installation of this telecommunications equipment on the roof (even if not visible from street level, if that is correct) will substantially detract from what is an otherwise sympathetically renovated building.

[REDACTED]



From: PLN - Comments
Sent: 08 January 2018 23:36
To: PLN - Comments
Subject: Comments for Planning Application 17/00878/FULL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 11:34 PM on 08 Jan 2018 from [REDACTED]

Application Summary

Address: 46 - 47 Chancery Lane London WC2A 1JE
Proposal: Installation of telecommunications equipment at roof level comprising nine antennae, one transmission dish, three cabinets, and associated ancillary development.
Case Officer: Gideon Stothard

[Click for further information](#)

Customer Details

Name: [REDACTED]

Email: [REDACTED]

Address: [REDACTED]

Comments Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Reasons for comment: - Residential Amenity
Comments: I strongly object to this planning application for a number of reasons:

1. I am concerned about the radiation from these telephone antennae. [REDACTED]

[REDACTED] I understand that the International Agency for Research on Cancer has classified RF fields as "possibly carcinogenic to humans" based on evidence suggesting a possible increased risk of brain tumours. Lincoln's Inn is a relatively densely populated section of this part of central London and in my opinion this telephone equipment could be more safely located away from residential buildings.

2. I am also concerned about the negative impact that these proposed antennae etc will have on the visual appearance of this otherwise very attractive historical building, situated within a conservation area.

3. I am concerned about the loss of residential amenity for my flat and others in Lincoln's Inn and the surrounding areas. Lincoln's Inn contains a number of unusually beautiful historic residences in the heart of central London.

[REDACTED]. There has been a large amount of development work along Chancery Lane in the last few years but thankfully the majority of this has been done sympathetically. The building at 46-47 Chancery Lane is a very good example of sympathetic modernisation. However, the installation of these disproportionately large and unsightly antennae will undermine the efforts that were clearly made to keep 46-47 CL in keeping with the Victorian buildings of Old Square, Lincoln's Inn.

For the reasons set out above, amongst others, I am very much opposed to this planning application and respectfully ask that my objections are taken into consideration.

From: COL - Contact Centre
Sent: 09 January 2018 15:08
To: Pln - CC - Development Dc
Subject: FW: PRO - FW: Development of 46-47 Chancery lane COL:05470224

17/00878/FULL

From: Hubert Picarda
Sent: 09 January 2018 12:45
To: PRO Queue <PROQueue@int.cityoflondon.gov.uk>
Subject: Development of 46-47 Chancery lane

Dear Sir or Madam,

his letter is a formal objection to a proposed development of aeriels and antennae on the building of 46-47 Chancery Lane . I write as a long term resident in Lincolns Inn since 1966 in flats at 11 n Old Square and from 1978 9 Old Square . Prior to that I had lived in the Temple from 1948 in flats at 5 Essex Court and 4 Pump Court . Born in 1936 I have lived all but 12 years of my life in the Inns of Court (belonging to three of them Inner Temple Lincoln's Inn and Gray's inn the latter two which I joined in 1965).

Through my friendship with the late Francis Cowper author of Prospect of Gray's Inn and chronicler of life in the Inns of Court and their treasures and my associations with the Betjeman family (John Penelope and Candida Betjeman) I have been a supporter of preserving the integrity of fine architecture and precious historic and natural environments generally and of the Inns of Court and Chancery lane in particular and have recorded my love of the Inns in various publications .

I therefore whole heartedly associate myself with, and adopt and adapt with additional comments of my own each and every one of the objections raised by James Manning of 15 Old Square and Denise McFarland of 11 Old Square to the proposals on the several grounds as articulated and repeated below . This gratuitous invasive after thought development is a step too far

1. Lincolns Inn - which is within a few metres of the proposed development - contains many buildings and areas of huge heritage importance . Chancery lane itself is a part of the fabric of historic London and an ancient part of the wider City. To develop the structures and aeriels etc. in the manner proposed is wholly inconsistent with the environment of Chancery Lane / Lincoln's Inn particularly in terms of building type, and development. One end of the roof of 46 47 Chancery lane is clearly visible from three rooms in our flat overlooking Old Square. And it will be a blot and blight on the landscape

2. The adverse impact of the proximity of aeriels and antennae of the type proposed has been proven by the scientific community see eg <https://es-ireland.com/mwfradiation/masts-antennae>. Not only does it have an adverse impact on the health of people but also has been shown to diminish wildlife (bees and birds in particular). The emissions from such antennae and disruptions they cause create environmental pollution. Thus I too particularly object to the environmental pollution of this proposed development. By way of example, bee hives are kept in Lincolns Inn and by neighbouring firms of solicitors (the latter on rooftop hives) and there are many birds who live in the Inn and neighbouring Gray's Inn to which I belong and Lincolns Inn fields - including birds of prey and endangered house sparrows and other garden bird species. We must protect our living heritage and prevent encroachment of business development which has been shown to present risks of harm to not only people but our living heritage too.

3. Finally, the traffic which uses Chancery Lane already is under great pressure particularly at peak times and when bikes are using the in my contra flow system. It is in essence a single lane highway but constant parking by lorries

and vans servicing a development site (as we suffered during the Saatchi development) poses a hazard and danger to pedestrians and all road users. To allow another major development without the appropriate infrastructure to support it , and thereby putting significant further pressure on the roads' systems and users would be negligent and fail to take into proper account the balance of safety , and risks versus the desires of the Applicant.

Please acknowledge safe receipt of this objection by email

Best wishes

Hubert Picarda QC

From: PLN - Comments
Sent: 09 January 2018 10:09
To: PLN - Comments
Subject: Comments for Planning Application 17/00878/FULL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:06 AM on 09 Jan 2018 from Ms Denise McFarland Cruickshanks .

Application Summary

Address: 46 - 47 Chancery Lane London WC2A 1JE
Proposal: Installation of telecommunications equipment at roof level comprising nine antennae, one transmission dish, three cabinets, and associated ancillary development.
Case Officer: Gideon Stothard

[Click for further information](#)

Customer Details

Name: Ms Denise McFarland Cruickshanks
Email:
Address: 11 Old Square Lincolns Inn London

Comments Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Reasons for comment:
- Residential Amenity
- Traffic or Highways
Comments: Dear Sir or Madam,
I object to the proposals on several grounds:

1. Lincolns Inn - which is within a few metres of the proposed development - contains many buildings and areas of huge heritage importance . Chancery lane itself is a part of the fabric of historic London and an ancient part of the wider city. To develop the structures and aerials etc. in the manner proposed is wholly Inconsistent with the environment of Chancery Lane / Lincolns Inn but in terms of building type, and development.

2. The adverse impact of the proximity of aerials and antennae of the type proposed has been proven by the scientific community. Not only does it have an adverse impact on the health of people but also has been shown to diminish wildlife (bees and birds in particular). Thus I particularly object to the environmental pollution of this proposed development. Bees are kept in Lincolns Inn and by neighbouring firms of solicitors (the latter on rooftop hives) and there are many birds who live in the

Inn and neighbouring Grays Inn and Lincolns inn fields - including birds of prey and endangered house sparrows and other garden bird species. We must protect our living heritage and prevent encroachment of business development which has been shown to present risks of harm to not only people but our living heritage too.

3. Finally, the traffic which uses chancery lane already is under great pressure particularly at peak times and when bikes are using the contra flow system. It is in essence a single lane highway but constant parking by lorries and vans servicing a development site (as we suffered during the Saatchi development) poses a hazard and danger to pedestrians and all road users. To allow another major development without the appropriate infrastructure to support it , and thereby putting significant further pressure on the roads system and users would be negligent and fail to take into proper account the balance of safety , and risks versus the desires of the Applicant.

From: PLN - Comments
Sent: 09 January 2018 12:58
To: PLN - Comments
Subject: Comments for Planning Application 17/00878/FULL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 12:56 PM on 09 Jan 2018 from Mr Michael Levenstein.

Application Summary

Address: 46 - 47 Chancery Lane London WC2A 1JE
Proposal: Installation of telecommunications equipment at roof level comprising nine antennae, one transmission dish, three cabinets, and associated ancillary development.
Case Officer: Gideon Stothard

[Click for further information](#)

Customer Details

Name: Mr Michael Levenstein
Email:
Address: 14 Old Square Lincoln's Inn London

Comments Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Reasons for comment: - Residential Amenity
Comments: The proposal will have an immediate and detrimental impact on the line of sight of all the flats at and around roof level in circumstances where the intended objectives can be satisfied with either antennae located within the building or along the alleyway and out of site of Chancery Lane. It is clear that the tenants have been able to meet their telecommunications need hitherto with the existing arrangement(s) insofar as there are a number of high-tech firms and businesses in occupation there already.

From: PLN - Comments
Sent: 09 January 2018 15:33
To: PLN - Comments
Subject: Comments for Planning Application 17/00878/FULL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 3:31 PM on 09 Jan 2018 from Mr Francis Barlow.

Application Summary

Address: 46 - 47 Chancery Lane London WC2A 1JE
Proposal: Installation of telecommunications equipment at roof level comprising nine antennae, one transmission dish, three cabinets, and associated ancillary development.
Case Officer: Gideon Stothard

[Click for further information](#)

Customer Details

Name: Mr Francis Barlow
Email:
Address: Flat 2, Old Buildings, Lincoln's Inn, London

Comments Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Reasons for comment: - Residential Amenity

Comments: I am a resident of Lincoln's Inn and the chairman of the Lincoln's Inn Residents' Association. I am also a professional tenant of a set of barristers' chambers at 10 Old Square, but it is principally in my capacity as a resident that I write to you.

As you know, Lincoln's Inn is an elegant enclave in the middle of London with many fine buildings which house not only sets of barristers' chambers and offices for solicitors and other professional people but also a large number of flats. Almost all the flats are located on the top storey or the top two storeys of these buildings. The proposed development will undoubtedly be very unsightly to those with a view of it and while it may not be visible or very visible from ground level, residents of flats in the Inn which overlook Chancery Lane will have a grandstand view. Although I am not personally very directly affected (my flat is on the second floor of 23 Old Buildings and has no view over Chancery Lane), residents with flats on the East side of Old Square and Gatehouse Square will be badly affected. I know that some will have already written to you to object, but I

suspect that some may not even know about the proposal. (I only found about it myself this morning.) I have no doubt at all that if they did they would object. I hope that in the circumstances you will allow me, in my representative capacity, to lodge an objection on their behalf as well as on my own.

From: PLN - Comments
Sent: 09 January 2018 16:18
To: PLN - Comments
Subject: Comments for Planning Application 17/00878/FULL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 4:16 PM on 09 Jan 2018 from Mr Michael Huntington.

Application Summary

Address: 46 - 47 Chancery Lane London WC2A 1JE
Proposal: Installation of telecommunications equipment at roof level comprising nine antennae, one transmission dish, three cabinets, and associated ancillary development.
Case Officer: Gideon Stothard

[Click for further information](#)

Customer Details

Name: Mr Michael Huntington
Email:
Address: The Honourable Society of Lincoln's Inn The Treasury Office, Lincolns Inn London

Comments Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Reasons for comment: - Residential Amenity
Comments: Dear City of London Planning,

I object to the proposals on several grounds:

1. The Honourable Society of Lincolns Inn, which is located next the proposed development, is a site of historic significance that contains many listed buildings. The proposed development would not fit within the character of the neighbourhood which is protected by the Chancery Lane Conservation Area.

2. The proposed development would also adversely affect the following historic views that are described in the Chancery Lane Conservation Area Character Summer & Management Strategy SPD.

- a. View of Staple Inn gardens from Chancery Lane
- b. View into Quality Court from Chancery Lane

For the reasons listed above, I feel that this development should not be approved.

From: PLN - Comments
Sent: 09 January 2018 22:30
To: PLN - Comments
Subject: Comments for Planning Application 17/00878/FULL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:28 PM on 09 Jan 2018 from Mrs Eleanor Attwood.

Application Summary

Address: 46 - 47 Chancery Lane London WC2A 1JE
Proposal: Installation of telecommunications equipment at roof level comprising nine antennae, one transmission dish, three cabinets, and associated ancillary development.
Case Officer: Gideon Stothard

[Click for further information](#)

Customer Details

Name: Mrs Eleanor Attwood
Email:
Address: Flat 2 Six Stone Buildings London

Comments Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Reasons for comment: - Residential Amenity
Comments: The proposed installation will be visible from the residential accommodation in Lincoln's Inn. It is very different from the Victorian building on which it is proposed to be installed and will be completely out of character. This will affect the enjoyment of residents of the views of Chancery Lane. Surely such equipment can be installed somewhere less prominent.

Colville Estate Properties Limited

40 Craven Street
London WC2N 5NG

Department of the Built Environment
City of London
P O Box 270
Guildhall
London EC2P 2EJ

12 January 2018

Your Ref: PT GHS/17/00878/FULL
By Email to: plans@cityoflondon.gov.uk
Attention: Gideon Stothard

Dear Sirs

46 - 47 CHANCERY LANE LONDON WC2A 1JE

PLANNING APPLICATION REFERENCE: 17/00878

I am writing on behalf of Colville Estate Properties Limited (CEPL). CEPL are the freeholders of 46-47 Chancery Lane. An application has been submitted on a building that we own which we strongly object to. The application is for the installation of telecommunications equipment at roof level comprising nine antennae, one transmission dish, three cabinets, and associated ancillary development.

We understand that a planning application can be submitted without consent from the freeholder. However, it should be noted that whilst discussions have been held with the applicant in relation to the potential installation mast at the site (in the first half of 2017) we advised the applicant, through our agent, that after consideration CEPL would not be supportive of the installation of this equipment on the roof of 46 – 46 Chancery. From the CTIL Industry Site Specific Supplementary Information telecommunications installations document submitted in support of the application, the applicant outlines the alternative sites considered and not chosen for installation prior to the submission of this application. It is interesting to see that the majority of reasons outlined for not choosing the alternative sites were due to the landlord not supporting any form of telecommunications development on the building, and so we do not understand why an application has been submitted for 46-47 Chancery Lane when we have clearly expressed that we would not be supportive of this application. We have also noted the 8 objections raised by nearby residents to the current planning application.

46-47 Chancery Lane is located within the Chancery Lane Conservation Area. The building itself is not listed, however there are a number of listed buildings surrounding and near to the site. The Grade II* Southampton building No 25 (Patent office/library) is located directly east. Nos. 14 & 15 Took's Court are also Grade II listed and are located directly opposite No. 40 Chancery Lane (Saatchi and Saatchi).

Directors: Sir Nicholas Bacon, Bt. (Chairman) Timothy R. Bacon (Managing Director) William E. Drake
James R. Townshend John H. Stephen Henry H. Bacon Edmund A. Bacon Nicholas M Bartlett
Secretary: Mathew Nottingham Regn. No. 2428557 England
Registered Office: 71 Queen Victoria Street, London EC4V 4BE+

As outlined within the City of London Local Plan (2015) the designation of a conservation area carries with it the statutory duty to consider how an area or areas can be preserved and enhanced.

Conservation areas are defined as designated heritage assets within the NPPF (2012) and therefore the settings and significance of conservation areas should be sustained and enhanced. The City of London (COL) will expect that any development proposals within a conservation area should strengthen the special character of that conservation area and its setting.

Paragraph NPPF 132 states that 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. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification

Policy DM 12.1 outlines that *“development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.”* In addition, the policy states that *“development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.”*

Policy DM 12.2 (Development in conservation area) states that development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.

Under policies DM 12.1 and policies DM 1203, development proposals will be required to include supporting information describing the significance of any heritage assets whose fabric or setting would be affected and the contribution made by their setting to their significance and the potential impact of proposals on that significance.

The CTLIL Industry Site Specific Supplementary document details the application proposals and discusses the location of the telecommunications installations. Specifically, the document outlines that *“the visual effects of the proposal will be minor given the small scale of the proposed rooftop apparatus in comparison with the overall bulk of the host and surrounding buildings.”* Firstly, it is important to point out that the applicant is acknowledging that there will be a detrimental visual impact following the installation of this plant. In addition, we do not think that comparing the size of the plant equipment with a six-storey building is a valid comparison in terms of visual impact. The document then goes on to say that *“the utilisation of a shared rooftop site and thereby eliminating the need to build two new ground based installations within the street environments will have the least detrimental visual impact on the Chancery Lane Conservation Area.”* This statement is insinuating that whilst there is a visual impact, it could have been a lot worse. This is not sufficient justification and should not be considered as a positive during the determination of this application. The visual impact of this plant needs to be assessed as a standalone proposal.

The existing parapet level of the building is 21.93m, if consent is granted the top of the proposed antennas will rise to 26.33m (circa 4 metres increase). The increase in height and the addition of 9.no antennas and other plant equipment proposed will be extremely unsightly and will have a profound detrimental impact on the existing building and the surrounding roovescape. It is clear that by reading the other objections, a number of local residents are in agreement with this.

The proposals will not strengthen the special character of the Chancery Lane Conservation Area and would not be compliant with the aspirations of COL (policy DM12.2) for new development proposals.

Strategic Objective 1 and policy CS1 of the City of London Plan seeks to maintain and strengthen the City's status as the world's leading international financial and business centre. As a consequence, any proposal that has the potential to restrict potential future office development should be resisted. Whilst we have no immediate plans to evaluate the potential of the portfolio to accommodate more office floorspace, the introduction of such a significant amount of telecommunications equipment would unquestionably have negative implications in this regard.

In conclusion, we believe that the application should be refused on the basis that the proposals will have a profound detrimental visual impact to the surrounding area and the installation of the plant equipment will not respect, preserve or enhance the character of the Chancery Lane Conservation Area contrary to planning policies DM12.1 and DM12.2.

We trust that the above comments will be fully considered and taken into account as part of the determination process for this application.

Yours faithfully

T R Bacon
Managing Director

Colville Estate Properties Limited

40 Craven Street
London WC2N 5NG



Department of the Built Environment
City of London
P O Box 270
Guildhall
London EC2P 2EJ

22 February 2018

Your Ref: PT GHS/17/00878/FULL
By Email to: plans@cityoflondon.gov.uk
Attention: Gideon Stothard



Dear Sirs

46 - 47 CHANCERY LANE LONDON WC2A 1JE

PLANNING APPLICATION REFERENCE: 17/00878

Further to my letter of 12 January 2018 concerning the above planning application there is one further point that needs to be made.

46-47 Chancery Lane is a small building and, whilst it is currently manned by a receptionist during normal office hours, we do not have the ability to provide 24 hour access to the roof. This was a contributory factor when we decided not to proceed with our discussions with the operator last year.

Yours faithfully



T R Bacon
Managing Director

ACKNOWLEDGED 27.02.18 *SS*