

Planning Application

Installation of antennas

at

**St Giles Hotel
Bedford Avenue
London
WC1B 3GH**

**Combined Planning and
Design & Access Statement**

August 2020

St Giles Hotel, Bedford Avenue, London WC1B 3GH
Installation of antennas and associated works

Combined Planning and Design & Access Statement

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Luminet

Luminet was founded in 2005 and was one of the first to offer commercial wireless broadband solutions to businesses. It has since grown its client base in London to a substantial number of businesses. In April 2018, Luminet received a £3 million development capital investment from Foresight to expand network and coverage across 400 Sq km of London and to scale the partner program.

While the majority of domestic and business Internet users rely on cabled Internet connections, there is a growing movement towards remote (wireless) connections. With falling costs and improved technology microwave internet connections are becoming ever-more feasible as a main Internet connection. The installation at the St Giles Hotel is required as a major hub to accommodate increasing demand from customers.

Requirement

Luminet are endeavouring to secure new roof top agreements for antennas on various high buildings across the capital.

Luminet's has some 1000 plus business customers in the centre of London with a large proportion being businesses in the Camden Council area. Luminet supplies high quality connections to the Internet for these customers, and their offering is in high demand.

The deployment of more sites will enable Luminet to provide high speed internet to many more businesses in the Camden Area and other parts of central London.

In this particular case, the proposal at the St Giles hotel is driven by a need to replace an existing site in High Holborn, where Luminet have been obliged to remove their apparatus.

Site Specific Proposals

The installation in this case consists of some relatively low, free standing frames around the higher roof area of the St Giles Hotel, and the installation of a total of 88 small (300mm) antennas/dishes, utilising these frames (associated equipment housings and cabinets will be accommodated within the hotel's equipment room on the 11th floor).

The frames will stand just 1.5m above the roof, with the antennas/dishes attached and installed part way up. Given the total height of the hotel at some 43.5m, and the higher roof being well away from the frontages on to either Bedford Avenue or Great Russell Street, the frames and antennas are unlikely to be noticed.

Following a pre-application consultation exercise, the frames and antennas have been pushed back slightly from the roof edge, in order to further limit any impact. However, this has necessarily been restricted, as pushing the antennas further back, would have caused signal clipping from the roof edge. In turn, that means placing the antennas further back would mean that they would have to be higher, and thus increasing any visual impact.

Site Options & Location

Given the concentration of customers in central London and Camden, and the need to connect them to the Luminet network within this area, a site of sufficient height, and an ability to accommodate the Luminet equipment, is clear.

This particular requirement stems from the necessity to vacate their existing site at 166 High Holborn, Covent Garden, WC1V 6TT. This was due to a lease expiry in 2017, and it was not possible to agree new terms

While a number of buildings were considered, location, height and the willingness of the Hotel owners to accommodate Luminet were crucial in this case. Having then undertaken a survey, it was determined that an installation was a feasible and practical choice, thus this scheme has been progressed.

Since Luminet learnt of the need to remove their installation from the site in high Holborn, they have found it very difficult to acquire sites in this area; In practical terms, it is essential that the chosen building has:

- Significant height to provide maximum line of sight
- Space within a reasonably large roof area for the equipment
- Safe access for deployment and maintenance

Moreover, any site must be acquirable; Most siteproviders were simply unwilling, or unable to negotiate. The clearest, and most obvious, examples where genuine efforts were made were:

- Met Building, 22 Percy Street
- 18 Tottenham Court Road
- 121-125 Shaftsbury Avenue

After 2 years of continuous effort the owners of the St Giles Hotel were willing to discuss terms and agreed to lease the roof for Luminet's operations. This building is in an ideal location, having line of sight access to thousands of existing and target businesses in Holborn and Mayfair.

The associated map document that accompanies the application details the above.

Policy

Central

The National Planning Policy Framework details Government guidance on planning for telecommunications development. This confirms the principle policy of the Government to facilitate the growth of new and existing telecommunication systems, whilst keeping the environmental impact to a minimum.

The NPPF at section 10 states:

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)

In July 2018, the government published their 'Future Telecoms Infrastructure Review'. Within the Executive Summary, it states:

‘For the UK to be the best place to start and grow digital businesses, we need greater investment to build fixed and wireless networks that are fit for the future, and take advantage of the benefits of fixed and mobile convergence. The wide-scale deployment of these next generation technologies will underpin the UK’s modern Industrial Strategy and the Grand Challenges in areas where the UK can lead the global technological revolution. We want every part of the UK to be able to benefit from the significant economic developments that digital connectivity brings.’

In October 2019, the DCMS published an updated version of its ‘*Statement of Strategic Priorities for telecommunications, the management of radio spectrum, and postal services*’. Within this, it stated:

‘The Government is committed to providing the UK with world-class digital connectivity that is gigabit-capable, reliable, secure and widely available across the UK. We want the nationwide deployment of gigabit-capable broadband networks at pace’.

London Plan

The London Plan (March 2016) 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.

It is considered that the Luminet 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 S16 ‘Digital Connectivity Infrastructure’ of the Plan. Policy S16, and its written justification is clearly supportive of the proposal and the role that it will perform in allowing Luminet to provide improved connectivity to the surrounding area.

The Mayor’s Office works with central government and London’s local authorities to ensure that strategic communication networks are enabled rather than inhibited by the planning and other regulatory systems (whilst ensuring the utility works themselves are properly managed).

The Luminet 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 shall help to implement the strategic objectives contained in the London Plan and London Infrastructure Plan.

Although still in draft form (revised version published July 2019), we are aware that a new London Plan is being developed, where (at Policy Sl6), there remains a requirement to encourage and develop the provision of digital infrastructure, stating that:

“London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. Fast, reliable digital connectivity is essential in today’s economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration”

It is our view that this particular scheme falls squarely in line with the above guidance and policy

Local

Section 70 of the Town and Country Planning Act 1990 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, most relevant to the proposal is the new Camden Local Plan

The new Camden Local Plan was adopted on 3rd July 2017 and has replaced both the adopted Core Strategy and the Development Policies document. However, we note that there is again no discernible telecommunications policy (paragraph 5.10 recognises the importance of digital infrastructure). Given this lack of policy, reliance must be placed on the NPPF, and other national guidance, as above.

The lack of any formal policy in relation to telecommunications is surprising, given the publication by the Council of the 'Digital Camden' strategy document (2014). Indeed, it states, '*High speed, affordable connectivity, is also vital if Camden and London, as a whole, is going to be competitive in a global economy*'. It goes on to state that a priority is to '*Stimulate high quality, next generation internet connectivity, including wi-fi and broadband, across Camden.*' We would contend that this scheme is clearly in line with these aims.

Pre-application consultation

Prior to the formal submission of the application, we have undertaken some correspondence with the planning department of Camden Council.

On 8th January, a formal pre-application submission was made, and included planning drawings, a covering letter and a supporting information sheet.

On 9th April, a response was finally received, from Jaspreet Charna. Within this, Mr Charna observed and commented on the following:

- That consideration be given to amending the design by possibly placing the equipment further back into the roof
- Further detail should be provided on the installation, in terms of larger scale plans and information on colours and finishes
- Further detail should be provided on efforts made to seek alternative buildings and locations

On 14th April, we replied as follows:

"Thank you for providing some pre-application feedback in relation to the above.

While we will now discuss these matters with our clients, I did want to refer to the following:

- *As you may appreciate with all telecommunications proposals, if the antennas are pushed back beyond the building edge, further into the building, there is an immediate problem with signal clipping. In order to overcome that, it is then necessary to raise the height of the antennas, which can then make them far more obvious and visually obtrusive. Given this, it is likely that locating the antennas as currently planned is the best option in terms of amenity and visually impact*
- *It is becoming increasingly difficult to find siteproviders who are prepared to engage with the telecommunications operators, and thus the range and number of sites obtainable are very limited. Coupled with ensuring that any site is technically suitable, this now very often means there are only a very small number of site options that are practically available."*

This application in fact has addressed all the points raised as:

1. The antennas have been pushed lightly further back into the roof, by 200mm. This is the maximum that can be achieved, without any signal clipping from the antennas. Any more than this would require the antennas (and frames) to be raised further, which would add to the visual impact
2. Further detail is now being provided by way of larger scale plans of a sample section of the installation, while information is also being provided on colours and finishes (generally light Grey RAL 7035, or galvanised, which should match the background of the roof area)
3. Further information is being provided on the need for the installation, and efforts to consider other buildings
4. Photomontages have also been provided, which indicate a very minimal visual impact on the local area

General Impact Issues

Visual

As the net effect of the works proposed will be a minor change to the existing buildings and their appearance, our firm belief is that the impact on visual appearance and amenity, both in terms of the hotel itself and the wider environment will be minimal.

The hotel stands at in excess of 40m, and at this height, the frames and antennas will have no material impact. In addition, the roofs used are themselves set back from the bulk of the hotel, while the additional set-back of the frames and antennas themselves further reduces any impression. The entire scheme will be finished to ensure minimal impact, and we do not anticipate that the impression and position of the deployment in the local environment will be material.

We have proposed that the antennas and frames will be RAL 7035 (light grey), or galvanised as appropriate, as this should ensure that they blend into the existing rooftop environment. If the Council would like to suggest a different colour or finish, we are completely open to suggestions.

The photomontages that accompany the application clearly demonstrate how little impact this scheme will have on the hotel itself, and its bearing within its locality, or the Conservation Area that surrounds the hotel. Please note that a large number of viewpoints have been considered in order to produce meaningful photomontages, and many were such that it was not possible to see the roof; the five that have been provided are where that has been feasible, but it is clear that the impression on the hotel and area is very small.

Impact on Building

We are conscious that the scheme includes the installation of antennas and associated frames on the building, but at more than 40m in height, and of no architectural merit, located outside any Conservation Area, with existing plant and machinery on the roof, it is felt that the scheme will have no discernible impact on The St Giles Hotel, or its impression on the locality.

The St Giles Hotel is a utilitarian building, with various items of plant and machinery on its many roofs, and nothing within this scheme will notably increase the hotels bearing.

Design & Access

Design Component

- Use proposed - Installation of antennas on a limited frame arrangement, to provide true ultrafast wireless broadband connectivity to businesses in the area

- Amount - the installation of a total of 88 small (300mm) antennas/dishes, utilising simple frames (associated equipment housings and cabinets will be accommodated within the hotel's equipment room on the 11th floor).

The frames will stand just 1.5m above the roof, with the antennas/dishes attached and installed part way up. Given the total height of the hotel at some 43.5m, and the higher roof being well away from the frontages on to either Bedford Avenue or Great Russell Street, the frames and antennas are unlikely to be noticed.

- Layout - As above and as per drawings and associated photomontage pack.
- Scale - As above and as per drawings
- Landscaping - N/A.
- Appearance - the installation of a total of 88 small (300mm) antennas/dishes, utilising simple frames (associated equipment housings and cabinets will be accommodated within the hotel's equipment room on the 11th floor).

The frames will stand just 1.5m above the roof, with the antennas/dishes attached and installed part way up. Given the total height of the hotel at some 43.5m, and the higher roof being well away from the frontages on to either Bedford Avenue or Great Russell Street, the frames and antennas are unlikely to be noticed. The photomontages provided very clearly confirm this.

We have proposed that the antennas and frames will be RAL 7035 (light grey), or galvanised as appropriate, as this should ensure that they blend into the existing rooftop environment. If the Council would like to suggest a different colour or finish, we are completely open to suggestions.

Access

Access to the works is by definition limited to Luminet and their authorised agents.

The works will not impede any current or future access to the site, buildings or individual rooms.

Conclusion

The proposal to install the Luminet microwave internet connections system on The St Giles Hotel is as a direct result of demand for true ultrafast wireless broadband services, and to replace the existing hub in High Holborn. The scheme is also in accordance with the adopted policy of Camden Council, while also being in full accord with central government guidance, together with the London Plan.

In physical terms, the works will witness a very limited change to the existing site and buildings, and our firm belief is that the impact on visual appearance and amenity, both in terms of the building itself, and the wider environment, will be minimal.