

Delegated Report		Analysis sheet		Expiry Date:	09/10/2020
		N/A / attached		Consultation Expiry Date:	20/06/2020
Officer			Application Number(s)		
Matthew Dempsey			2020/2015/P		
Application Address			Drawing Numbers		
Central St Giles 1 St Giles High Street London WC2H 8AG			Please refer to decision notice.		
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature		
Proposal(s)					
Installation of 10 antennas, 2 transmission dishes, 5 equipment cabinets and ancillary development thereto.					
Recommendation(s):		Refuse Planning Permission.			
Application Type:		Full Planning Permission			

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice					
Informatives:						
Consultations						
Adjoining Occupiers:	No. notified	00	No. of responses	14	No. of objections	14
Summary of consultation responses:	<p>Site notices were displayed from 27/05/2020, which expired 20/06/2020.</p> <p>Twelve objections were received during public consultation which can be summarised as follows:</p> <ul style="list-style-type: none">• Antennas should not be placed on residential buildings.• Preference for installations to be placed on commercial properties.• Negative impact on the (Renzo Piano) architecture of the host building.• Opposition to scale of the installations.• Poor design of the antennas.• Visual impacts on the Conservation Areas.• Concerns about health impacts associated to 5G technology.• Disturbance to residents during installations and maintenance.• Lack of consultation between applicant and residents.• Concern regarding the evidence presented in support of the scheme.• Incomplete discounting of alternative sites with tandem submissions, i.e.) proposed installation, at No.55-59 New Oxford Street ref: 2020/1649/P.• Disregard for pre-application advice issued.• Confusing nature of several applications being submitted/ withdrawn and re-submitted.• Incorrect site address given as opposed to Matilda Apartments, No.4 Earnshaw Street. <p>Notably, an objection was received from the architects of the Central St Giles development, namely; the Renzo Piano Building workshop (RPBW). This objection to the proposed installation can be summarised as follows:</p> <ul style="list-style-type: none">• Querying need to install equipment above a residential block.• Small floor plate of the block will enable visibility of installations.• Negative impacts on the historic surroundings.• Incongruous addition to the roof-scape.• Concern regarding reputational damage to due to poorly designed installations upon their intellectual property.• Inaccuracies with the plans submitted, highlighting several issues.• Loss of the fifth façade (the roof) and impacts on views from surrounding buildings, such as Centre Point.• Lack of respect for the design challenge met by siting modern building between three conservation areas and heritage assets.• Highlight efforts made with LPA to achieve Central St Giles Development.• Own CGI imagery provided to demonstrate visual impacts in several views around the site.					

	<p>Furthermore, an objection was received from the representatives of the freeholder of the site, namely; Cameron McKenna Nabarro (CMS) acting on behalf of Central Saint Giles General Partner Limited. This objection to the proposed installation can be summarised as follows:</p> <ul style="list-style-type: none"> • Support of the RPBW Objection. • Harm to the property, the heritage and appearance. • Failure to consider alternative sites, pointing to the Albion House application ref: 2020/1649/P. • Impact on the local views from the street and surrounding buildings. • Highlight conditions imposed on the host building with regards to installations at roof level. • Lack of design and access statement, heritage assessment or townscape assessment. • Impacts on grade I listed Church of Saint Giles in the Fields. • Lack of justification for the site. • Lack of sequential approach to site selection. • Disingenuous alternative site selection. • Concerns that application is incomplete and should not have been accepted by the LPA. • Concerns that the LPA overlooked temporary amendments to the Development Management Procedural Order, effective from 14/05/2020. <p>The applicant was given the opportunity to respond to comments received, and provided some additional information in support of the scheme, however all objections have been upheld.</p>
<p>CAAC/Local groups* comments: *Please Specify</p>	<p>The Covent Garden Community Association (CGCA) objected to the installation at the host site on the following grounds:</p> <ul style="list-style-type: none"> • Negative impacts on three conservation areas (Denmark Street, Bloomsbury and Seven dials [Covent Garden]) which surround the site. • Negative impact on the host building and surrounding Renzo Piano development. • Poor design of the proposed equipment. • Disregard for pre-application advice issued. • Lack of any shielding/ screening being proposed to camouflage the proposed installation. • Loss of rooftop amenity space for residents of the host building. • Concerns about public health impacts.

Site Description

The host building and surrounding development was designed by Renzo Piano in collaboration with Fletcher Priest Architects between 2002 and 2010. The Matilda Apartments building is one of the tallest of the distinctive modern towers surrounding Central St Giles Plaza, adjoining No.1 St Giles High Street and fronting on to Earnshaw Street. The Earnshaw Street and Bucknall Street elevations are clad in an orange colour, with internal elevations facing the Plaza clad in a light grey colour. The specific site is fifteen storeys in height.

The property is not within a conservation area, however it is surrounded by the Denmark Street Conservation Area, the Bloomsbury Conservation Area, and; the Seven Dials (Covent Garden) Conservation Area. To the west of the site, the nearest neighbours are Centre Point, Centre Point House and White Lion House (1961) which are grade II heritage assets, and to the south of the Central St Giles Plaza is the Church of St Giles in the Fields (1731) which is listed grade I. There are also several other listed buildings within close proximity.

The application which is the subject of this report relates to proposed installations at roof level. The main roof is approximately 44m above the ground level. There is an existing grillage structure upon the main roof at approximately 46.5m above ground level. There are no existing rooftop installations to the host building.

Relevant History

Host site (Central St Giles)

2005/0259/P - Redevelopment of site for mixed use development comprising office (class B1), retail (class A1), food and drink (class A3), community (class D1) and residential (class C3) uses, new public courtyard and new pedestrian routes across the site. **Granted Subject to a Section 106 Legal Agreement 04/10/2006.**

2019/5697/PRE - Installation of telecoms equipment. **Advice issued 04/02/2020.**

2020/1647/P - Installation of 10 no. antennas (top height of masts 52.10m AGL), 2 no. transmission dishes, equipment cabinets and ancillary development thereto. **Withdrawn by applicant 04/05/2020.**

Castlewood House (77-91 New Oxford Street):

2006/5234/P - Installation of three antenna, two microwave dishes, six equipment cabinets and associated ancillary development in connection with the development of a mobile telecommunications base station at roof level to existing office building (Class B1). **Granted 13/02/2007.**

2011/4036/P - Installation of three radio antennas, three 600mm dish antennas, and two equipment cabinets to the rooftop of office building. **Granted 27/09/2011.**

Relevant policies

National Planning Policy Framework (NPPF) 2019

London Plan 2016

Camden Local Plan 2017

A1 Managing the impact of development

D1 Design

D2 Heritage

Camden Planning Guidance

CPG Amenity (2018)

CPG Design (2019)

CPG Digital Infrastructure (2018)

Bloomsbury Conservation Area appraisal and management strategy (2011)

Denmark Street Conservation Area appraisal and management strategy (2010)

The Seven Dials Estate (Covent Garden) Conservation Area statement (1998)

Assessment

1.0 Proposal:

- 1.1 Planning permission is sought for the installation of telecommunications equipment at roof level to facilitate 5G coverage in the vicinity of the site.
- 1.2 The proposed installations include:
 - Ten antennas,
 - Two transmission dishes,
 - Five equipment cabinets,
 - And ancillary development, such as; support structures and cable trays.
- 1.3 The site proposed has been identified as a replacement for the existing installations at nearby Castlewood House, 77-91 New Oxford Street, which been served with a notice to quit.
- 1.4 It may be noted that this application has been submitted alongside a similar application for an installation of telecommunications equipment to replace the Castlewood House installation, at No.55-59 New Oxford Street ref: 2020/1649/P.
- 1.5 The site address for this application is given as Central St Giles, 1 St Giles high Street, WC2H 8AG. However; the building to which installations are proposed is the adjoining neighbouring building within the Central St Giles development, namely; Matilda Apartments, which has the address No.4 Earnshaw Street, WC2H 8AJ. The correct building is highlighted on the site location and other plans.

2.0 Assessment:

- 2.1 The principle considerations in the determination of this application are:
 - Design – Impact on the character and appearance of the host building, streetscene, conservation area(s), and nearby listed buildings; and
 - Amenity – Impact on neighbouring amenity.

3.0 Design:

- 3.1 Policy D1 of the Camden Local Plan seeks to secure high quality design in development; specifically requiring development to respect local context and character; preserve or enhance the historic environment and heritage assets in accordance with Policy D2; and preserve strategic and local views. Policy D2 states that the council will seek to protect heritage assets and non-designated heritage assets. Policies D1 and D2 are supported by the Council's Design CPG and Digital Infrastructure CPG.
- 3.2 The NPPF requires Local Planning Authorities to keep the number of radio and electronic communications masts, and the sites for such installations to a minimum, consistent with the

needs of consumers, the efficient operation of the network and to provide reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.

- 3.3 The proposal would introduce a significant amount of telecommunications equipment to the rooftop space, and would be visually prominent in several locations from local street level and also from longer views from surrounding conservation areas.
- 3.4 The roof of the host building is approximately 44m above ground level. The new installations would be positioned at approximately 52m above ground level, which is considered to significantly alter the roof form in opposition to the guidance offered at the pre-application stage.
- 3.5 The applicant has provided supporting information explaining why antennas are proposed as positioned 'vertically' as opposed to 'horizontally', however; there is limited explanation of the overall design of antennas or any other equipment which was raised at the pre-application stage and also supported by the Covent Garden Community Association consultation response.
- 3.6 The applicant suggests that the proposed equipment is designed so that it resembles rooftop infrastructure commonly found within the urban streetscene, however; this argument is given limited weight, as the proposed installations should be suited to the specific host property and site context in accordance with best practice, and; the pre-application advice offered, rather than suited to a generic streetscene. Pre-application advice was offered with the expectation that bespoke designs would be thought through for any installations within conservation areas and/ or affecting the setting of listed buildings or other heritage assets. However the submission does not appear to have taken account of this advice.
- 3.7 The proposed installation also includes railings mounted close to the edge of the roofline which would add to the prominence and visual clutter of the proposal. This building currently benefits from a crisp roofline which means there is no roof level clutter associated with visible rooftop infrastructure.
- 3.8 Objections submitted by the Renzo Piano Building Workshop include new visualisations that highlight the prominent and jarring visibility of the proposals, especially the view south from New Oxford Street. While the detail in the RPBW visualisations are at odds with the applicant's visualisations (which are low-resolution), officers consider that the visualisations provided by the RPBW appear consistent with the submitted drawings and officers give weight and credibility to their illustrative material.
- 3.9 Due to the visual prominence of the installations proposed, and inappropriateness due to the design, siting, and height of the unsympathetic telecommunications equipment, the proposal would neither preserve nor enhance the surrounding; Denmark Street Conservation Area. Furthermore, the proposed installation is considered to have a negative impact on the setting of nearby listed buildings. It is not considered that this harm would be outweighed by any public benefits to either the residents of the host building or the wider general public.
- 3.10 The proposal by virtue of its inappropriate design, siting, height, and prominence would result in a highly visually prominent, visually cluttering and incongruous development which would harm the character, appearance and setting of the host building, surrounding Denmark Street Conservation Area, Bloomsbury Conservation Area, the adjacent Seven Dials (Covent Garden) Conservation Area, and the setting of nearby listed buildings, contrary to policies D1 and D2 of the Camden Local Plan 2017, The London Plan 2016 and NPPF 2019.

4.0 Amenity:

- 4.1 Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered.
- 4.2 Due to the nature of the proposal, it is unlikely to result in significant harm to neighbouring occupiers by way loss of light or privacy. Any construction and maintenance impacts would be temporary and if necessary, could be secured through a Construction Management Plan.
- 4.3 The NPPF requires applications for telecommunications development to 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.
- 4.4 The applicant has provided supplementary information confirming that there are no schools in close proximity to the site, and therefore no such consultations were undertaken; the site is not located within 3km of an aerodrome or airfield and as such the Civil Aviation Authority and Secretary of State have not been notified. A declaration of conformity with ICNIRP Public Exposure Guidelines has also been submitted.

5.0 Conclusion:

- 5.1 The proposed antennas and ancillary development, by reason of their design, siting, height, size and prominence, would be detrimental to the appearance of the host building and character and appearance of the adjacent Denmark Street Conservation Area and the setting of the nearby assembly of listed buildings comprising Centre Point, Centre Point House and White Lion House contrary to policy D1 (Design) and D2 (Heritage) of the Camden Local Plan and paragraph 113 of the National Planning Policy Framework 2019.
- 5.2 Refuse planning permission.