

Matilda Apartments 4 Earnshaw Street London WC2H 8AJ

Installation of 6 x antenna apertures, 2 x transmission dishes and 8 x equipment cabinets & development ancillary thereto.

Application number: 2020/5822/P. Application type: GPDO Prior Approval Determination.

Covent Garden Community Association (CGCA) objects to the proposed development.

Although we do not oppose the siting of necessary telecommunications equipment per se, these proposals involve equipment 6 metres high, across an area of about 20 metres x 10 metres, on a residential roof at a high point overlooking Soho, St. Giles and Bloomsbury.

We do oppose the siting of such equipment:

- a) At this site, on a residential building and prominently visible from 3 of London's prime conservation areas.
- b) In its current, unnecessarily unattractive form at any site.

Our reasons for objection are:

1. This is not a replacement scheme.

We note that the Applicant states on the Application Form that the purpose of the application is "To replace the equipment which was on Castlewood House (immediately to the north of the application site)". However, that equipment related to different, older technology. And it was on an office building, not a residential block of flats. It is our view that this 5G scheme is therefore NOT a replacement, and should be considered de novo.

2. This scheme should not be considered under Prior Development rights.

We support the letter from lawyers representing Saint Giles General Partner Limited, the freehold owner of the Matilda Apartments. This makes the case for no application on this building benefiting from Prior Development rights, due to the planning conditions attached to the building itself. We therefore ask Camden as the LPA to pursue its right to refuse 2020/5822/P outright.

3. The proposals are more obtrusive than a previous, refused scheme at the same site.

This scheme is being applied for by MBNL (EE (UK) Ltd and H3G (UK) Ltd). It is worth noting that a similar, though less tall, scheme was applied for by Cornerstone (Telefonica UK Ltd & Vodafone Ltd) in May last year, and refused. The roof of Matilda Apartments building is shown on the most recent drawings as 46.34 metres above ground. The new scheme is shown in the drawings to be 54.8 metres above ground, the last was 52.1 metres above ground. So the new scheme would be almost 3 metres higher than the refused scheme.

4. The proposals would cause harm to the character and appearance of 3 of London's prime conservation areas.

The proposals involve equipment 6 metres high, across an area of about 20 metres x 10 metres, on a roof at a high point (on top of a steel frame 48.84 metres above ground) overlooking Soho, St. Giles and Bloomsbury.

Although the site is not itself within a conservation area, it is surrounded by the Bloomsbury Conservation Area, the Soho Conservation Area and the Denmark Street Conservation Area, and is

not far from the Seven Dials Conservation Area. There are also many listed buildings in close proximity to the site.

Such extensive rooftop clutter would harm the character and appearance of surrounding conservation areas. As the applicant's photographs show, the roof of Matilda Apartments is in clear view from parts of all 3 conservation areas – more so than many nearby buildings because it is on the very edge of the Renzo Piano development.

The Bloomsbury Association has thoroughly analysed the effect on the Bloomsbury Conservation Area to the North and North East. Effects on the Denmark Street and Soho Conservation Areas to the West and South would be similar. The utilitarian appearance of this equipment in this location cannot fail to detract from the building itself and harm the conservation areas.

In support of our objection, we cite an appeal decision that refused similar telecoms equipment on top of the Westbury Hotel in Conduit Street in 2019 (Appeal Ref: APP/X5990/W/19/3235853). The effect of the proposal was judged to cause harm to the character and appearance of the conservation area.

We support the council's past comments regarding the era of 5G telecoms providing a great opportunity for "creativity with regards to visual appearance" of equipment, in the same spirit as Giles Gilbert Scott's red telephone boxes. We urge the applicant to rise to the challenge, albeit at an alternative site in this case.

One could also take the 'disguise' approach of other countries; for example in Portugal masts have been moulded to look like trees, and at a distance are very effective.

A third alternative would be better screening. We might have suggested planting, but note that the effects of trees on signal degradation can be significant. Screening could instead be man-made to allow signals through, but be elegantly designed or disguised as something more appealing.

5. The proposal would cause harm to residential amenity.

Matilda Apartments is a large block of 53 family flats. As the planning officer acknowledged in this pre-application advice for the previous application, residents suffer from "installation work and any comings and goings in relation to ongoing maintenance". They also lose the possibility of using their own roof for recreation, which is something that we understand the Matilda House residents committee is discussing with the building's owner.

It must be understood that people have a legitimate fear of bringing up their families in close proximity to high frequency signals. Whether or not it is found in time that there is a direct impact on physical health, such fears still damage mental health now.

6. Alternative sites should be considered and consulted upon.

A key consideration is whether there is a viable alternative site option for the required facility. We would suggest that the answer in this case is that there are very possibly more options, and that a site other than the one proposed, and well concealed, should be chosen in this case.

The Applicant states on the Supplementary Information Form that "industry site databases were checked for suitable sites by the operator" but gives no detail of these.

As a first choice, if there is coverage for other service providers in the area then we ask that the equipment be positioned alongside their equipment. We would like to see appropriate database maps so that we can make meaningful comments about this. The obvious benefit would be that only one site would be compromised, rather than two. Could you ask the applicant to provide maps, please?
