

**From:** Stephen Heath <[REDACTED]>  
**Sent:** 24 June 2015 22:46  
**To:** Akhaja, Jagdish  
**Cc:** [REDACTED]  
**Subject:** Bloomsbury Association; Bedford Estate  
ST GILES HOTEL - APPLICATION 2015/3210/A

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**Categories:** Red Category

Jagdish

Thank you for the information that you have provided. We will review the proposal and come back to you with our detailed comments before 15 July. In the meantime, we suggest that you discuss the context of the application with your colleague, Elizabeth Beaumont, who has recently experienced a hasty and perhaps improper decision on another application for advertisement consent at the at Giles Hotel.

Our initial view on this application is that it may not be valid on two counts.

Firstly, the proposal appears to be for the recladding of two upper floors of the building on its entire street frontage. This will have a material impact on the appearance of the building, on several conservation areas and on the setting of adjoining listed buildings. There is also the issue of light pollution and the economic impact on retail units on the same frontage. As you know, applications for advertisement consent can only be decided with regard to two issues: the interests of amenity and public safety, which hardly seem adequate to address such impacts. We are therefore of the view that such a major proposal should be accompanied by a back-to-back application for planning permission.

Secondly, It is a condition of every consent granted under the Advertisement Regulations that, before the advertisement to which the consent relates is displayed, consent should be obtained from the owner or other individuals entitled to give such permission. The ownership structure of the St Giles Hotel building is complex. We understand that the freehold is still in the ownership of the YMCA with head leases in succession to Criterion Capital and the St Giles Hotel respectively, and various sub-leases. We are not convinced by the applicant's statement in Section 10 of the application form that J C Decaux Limited owns the land or buildings where the adverts are to be placed.

Should the application be decided on this basis and it is subsequently found to be invalid, it may be overturned on judicial review.

Regards,

Stephen Heath  
**On behalf of the Bloomsbury Association**

On 24 Jun 2015, at 10:59, Akhaja, Jagdish wrote:

Dear Mr Heath,

APPLICATION NO 2015/3210/A - "Display of 1x digital display screen (6.0 x 39.8 metres) to Tottenham Court Road elevation at 1st and 2nd floor level".



**Jagdish Akhaja**

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**From:** Bloomsbury Association [redacted]  
**Sent:** 24 June 2015 09:39  
**To:** Akhaja, Jagdish



**Subject:** ST GILES HOTEL - APPLICATION 2015/3210/A

Jagdish

You are likely to receive strong opposition to this proposal, which has just appeared on your weekly list. Please do not decide it until you receive all comments. What date do you need to receive these by?

Regards,

Stephen Heath  
**Bloomsbury Association**

