



**ST GILES HOTEL, 12 BEDFORD AVENUE**  
LONDON WC1B 3GH

**PROPOSAL:** Installation of 88 microwave antennas on the existing roof and associated works

Application for planning permission reference: 2020/3839/P

7 October 2020

The Bloomsbury Association objects to this application and wishes to make the following comments.

1. The St Giles Hotel, by virtue of its height and location, is very prominent in a local streetscape framed by much lower buildings. It terminates views along Charing Cross Road, Tottenham Court Road, Great Russell Street, Hanway Street, Hanway Place, Mowell Street, and Bedford Avenue and is also a dominant feature visible from Bedford Square. Photographs of a carefully curated selection of some of these views are included with the combined Planning and Design & Access Statement accompanying the application.

2. The Design & Access Statement states: *"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."* We disagree, particularly with respect to distant views from Charing Cross Road, Tottenham Court Road, Great Russell Street and from Bedford Square, which is not even considered by the applicant. These are all views from within adjacent conservation areas from where it is possible to see the roof. We include our own images from a wider selection of viewpoints on pages 4 and 5.

The applicant goes on to say *"This building is in an ideal location, having line of sight access to thousands of existing and target businesses in Holborn and Mayfair."* while also saying in relation to visibility and viewpoints that *"many were such that it was not possible to see the roof"*. Again, we are sceptical of these conclusions and the assertion that there is *"a very minimal visual impact"*. It is not possible to see such a large area and not be seen.

3. The applicant maintains in the Design & Access Statement that the St Giles Hotel *"is if no architectural merit"*. We disagree. It also states *"The St Giles Hotel is a utilitarian building..."* Again we disagree, questioning Luminet Solutions Limited's professional expertise to make such a judgment on the architectural merit of the host building. We note the reference to *"various items of plant and machinery on its many roofs"*, which is air-conditioning equipment installed incrementally over the years without prior planning permission that, at various times, has been the subject of planning enforcement action by the Council. It is apparent that the applicant has little knowledge of the building or of the area surrounding the proposed development.

4. The St Giles Hotel was purpose-built as a 650-room hostel, sports club and car park for the YMCA to a design in the brutalist style by Elsworth Sykes Partnership. It took six years to build and was completed in 1977 and widely applauded in the architectural press at the time. In 1995 the YMCA sold interests in its building to the St Giles Hotel Group and others whilst retaining the sports club for their own use.

Like it or not, the original Elsworth Sykes Partnership design is a well composed, classic exercise in brutalism that meets the ground with a podium that does all the ill-mannered things

that are associated with that particular style of architectural expression. The two-storey podium and four towers are recognisable parts of the building; they are boldly articulated; they have solid and void and the building has architectural integrity. This is recognised by many architectural historians commenting on the brutalist style and has recently attracted a lot of attention. The St Giles Hotel is one of the landmarks on Tottenham Court Road, along with Centre Point and the Heal's Building. Some consider the building equally worthy of listing because of its architectural importance.

The visual effect of the building is uncompromising. Recent ill-informed attempts to soften the impact of so much exposed, hard-edged, dirty concrete with such tacky devices as hanging baskets with artificial flowers, planters, plastic hedges and marble cladding have served only to make the whole appear tawdry. Its brutal shape-making and confident structural gesturing does not sit easily with the accepted building forms around it. It is of its time and does not adhere to the traditional rules of street architecture and follows its own logic to create an assertive form based around that of its function - to provide naturally lit rooms and lots of them.

This proposal makes things worse by adding tacky telecommunications infrastructure to an already extended roofscape. It is both damaging to the architectural expression of the existing building and to the conservation areas it faces. It ignores its context and applies a new, sterile, engineering aesthetic to its skyline that is screaming and shouting to make its presence known. It would be another unwelcome addition that only damages the architectural integrity of the host building, contrary to Policy D1 of Camden's Local Plan.

5. Bedford Square is another development representative of its time and was built between 1776 and 1780 for the Duke of Bedford. It is considered one of London's finest and best-preserved historic squares and is the only intact Georgian square in London. It was the first garden square with an imposed architectural uniformity that set the style for garden squares in London through the late 18th and early 19th centuries.

To reflect its importance, all of Bedford Square's 54 buildings are Grade I listed and English Heritage defines Grade I buildings as being 'of exceptional interest, sometimes considered to be internationally important'. The gardens have a Grade II\* listing on the English Heritage Register; all its later gas lamps are Grade II listed, as is the garden pavilion. The meticulous design of Bedford Square reflects the classical tastes of 18th century England for coherence and consistency in urban planning and city-scale architecture.

6. The broad principles established in national policy and guidance on the historic environment are reflected in the London Plan. The Plan's policies seek to ensure that the protection and enhancement of historic assets in London is based on an understanding of their special character, and form part of the wider design and urban improvement agenda. This recognises that asset value is more than the fabric of the Square's buildings but in the spatial quality of the space that they define and the approaches to, from and within it.

For this reason, in 2000, with substantial funding from Bedford Estate, English Heritage, Crown Estate and the London Borough of Camden, its public realm underwent careful refurbishment to reflect the asset value of its heritage.

7. The St Giles Hotel, along with Central Cross on the western side of Tottenham Court Road, already severely detract from the setting of Bedford Square and reflects attitudes prevalent at the time they were both developed in the early 1970s. The structures of the aerial array proposed on the roof of the building will make things worse and will be dominant in views from the northern and western sides of the Square and from the gardens and will detract from its setting - see photos. These are not characteristics that are compatible with current policies that seek to safeguard heritage assets, nor are they consistent with Policy D2 of Camden's Local Plan or the design principles contained in the Fitzrovia Area Action Plan.
8. The Association has always taken a firm position in ensuring that the asset value of Bloomsbury's heritage is not adversely affected by new development and expects the Council to ensure that the requirements of Policy D2 are met and that it will not permit any further

development that it considers would cause harm to the setting of listed buildings or that causes harm to the character and appearance of the Bloomsbury Conservation Area.

9. We conclude that the proposed antennas and ancillary development on the roof of the hotel, by reason of their design, siting, height, size and prominence, would be detrimental to the appearance of the host building, the character and appearance of the adjacent Bloomsbury and Hanway Street Conservation Areas and the Denmark Street Conservation Area. They would also be damaging to the setting of the Grade I listed buildings in Bedford Square; the setting of the assembly of listed buildings around Centre Point; the Grade II\* listed Congress House, the Grade II listed Dominion Theatre and adjacent former YWCA by Lutyens and listed Georgian townhouses at 98-109 Great Russell Street. This is contrary to policy D1 (Design) and D2 (Heritage) of the Camden Local Plan and paragraph 113 of the National Planning Policy Framework 2019.
10. The proposal is located within 120 metres of a school, Ecole Jeannine Manuel in Bedford Square, for nursery, primary and secondary age children. There are acknowledged health concerns about over exposure of young children to microwave electromagnetic radiation. In particular, Dr Helen Caldicott, Pediatrician and co-founder of Physicians for Social Responsibility, has advised: *"Radio frequencies emitted from mobile phone towers will have deleterious medical effects to people within the near vicinity according to a large body of scientific literature. Babies and children will be particular sensitive to the mutagenic and carcinogenic effects of the radio frequency radiation. It is therefore criminal to place of these aerials on or near a school"*. The risk of locating transmitter masts near to school premises is not assessed in the application with reference to current health and DfEE advice.
11. We also note the proposal is inadequately described in the application. It lacks any east or west elevations, no overall height is given for the array or any dimensions given for the antennas.
12. Earlier it was mentioned that the St Giles Hotel building has a number of ownership interests. The Certificate of Ownership, in Section 25 of the application form, wrongly states that nobody other than the applicant is the owner of any part of the land or building to which the application relates. This is incorrect and, under the Town and Country Planning (Development Management Procedure) Order 2015, formal notice of the application should have been served on the freeholder and other tenants with a qualifying interest. Without this, the application should not have been validated and, if determined on this basis, the decision may be legally unsound.

The Association supports good quality design that will enhance the West End's streetscape, which this does not. Camden has a responsibility to safeguard the historic assets in its care and, with such a demonstrable breach of the its planning policy and of its supplementary planning guidance, we look to the Council to refuse this application.

We would be grateful if you would let us know of any further modification to the application; the decision, if it is to be decided under delegated powers, or the meeting date if it is to be decided by Committee.

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

*Copies to:*

Matthew Dempsey, London Borough of Camden  
Bloomsbury CAAC  
Head of Estates, YMCA  
École Jeannine Manuel  
Steward, Bedford Estates  
Chair, Bedford Court Mansions Ltd

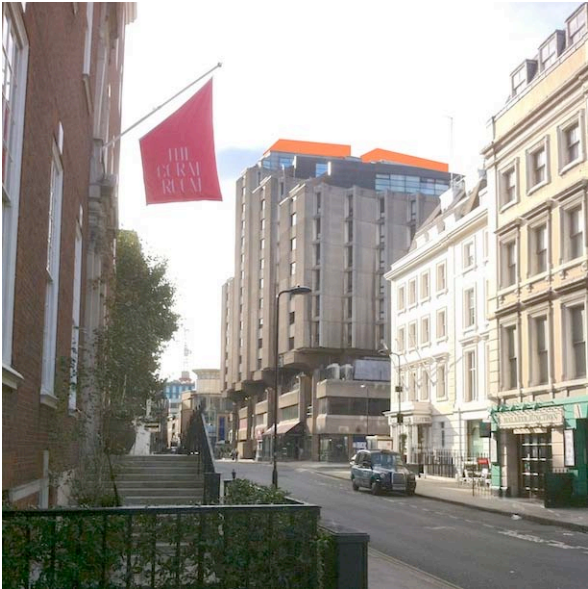
C20 Society  
Charlotte Street Association  
Fitzrovia Neighbourhood Association  
Covent Garden Community Association  
Hanway Place Residents' Association  
Chair, Bloomsbury Association

**Reference images**

**Visibility in the local streetscape:** page 1, items 1 and 2; page 2, item 7  
Affected roof areas indicated in red



*View from Tottenham Court Road*



*View from Great Russell Street*



*View from Morwell Street*



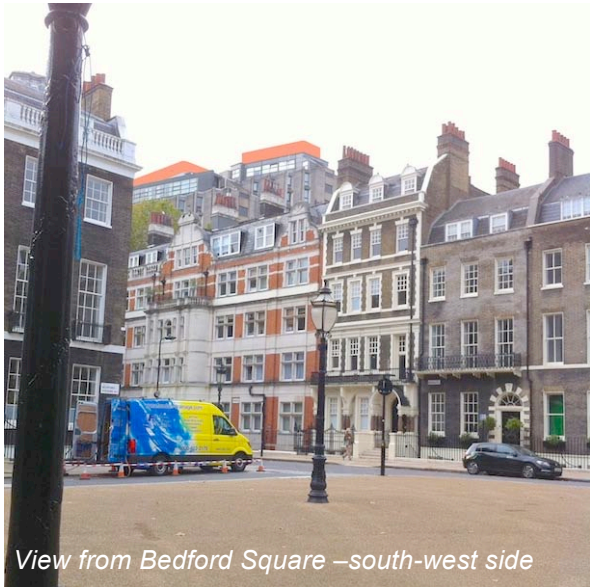
*View from Charing Cross Road*



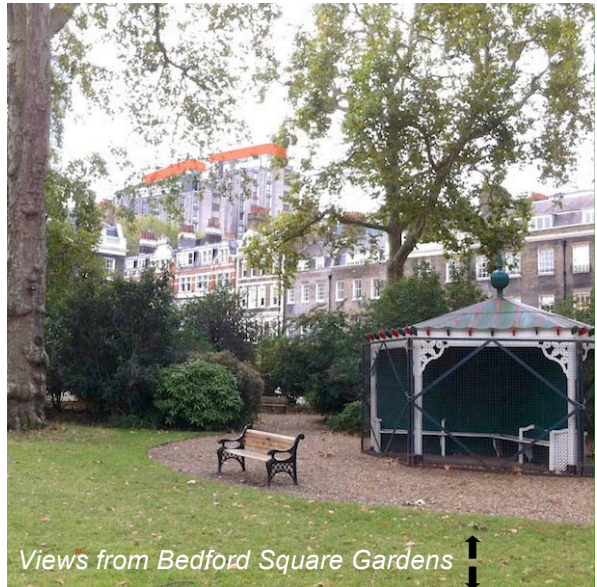
*View from Hanway Place*



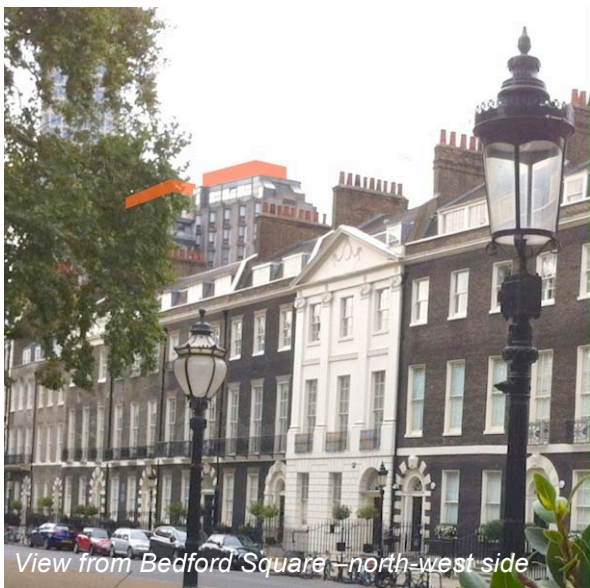
*View from Bedford Avenue*



*View from Bedford Square -south-west side*



*Views from Bedford Square Gardens*



*View from Bedford Square -north-west side*

