



**BLOOMSBURY
ASSOCIATION**

**CENTRAL CROSS, TOTTENHAM COURT ROAD
LONDON W1T 1BJ**

PRIOR APPROVAL APPLICATION FOR THE INSTALLATION OF 12 ANTENNA APERTURES, 4 TRANSMISSION DISHES AND 7 EQUIPMENT CABINETS ON THE ROOF OF THE BUILDING AND DEVELOPMENT ANCILLARY THERETO

Application for planning permission reference: 2021/4508/P

9 October 2021

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

1. Bedford Square was built between 1776 and 1780 for the fifth 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.

2. 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.

3. Central Cross, or the EMI building as it was originally known, already severely detracts from the setting of Bedford Square and reflects attitudes prevalent at the time it was built 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 southern and eastern sides of the Square and from the gardens and will detract from their setting - see photo. These are characteristics that are not 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.
4. 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 adjacent conservation areas. The Council is referred to the decision on application 2020/2469/P.

5. We conclude that the proposed antennas and ancillary development on the roof, 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. They would also be damaging to the setting of 53 Grade I listed buildings in Bedford Square and the setting of the Grade II* listed Square Gardens. 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.

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:
Ewan Campbell, London Borough of Camden
Steward, Bedford Estates
Bloomsbury Conservation Area Advisory Committee
The Georgian Group
Charlotte Street Association
Chair, Bloomsbury Association