



27 July 2017

OUTSIDE 118-132 NEW OXFORD STREET
LONDON WC1A 1HD

REPLACEMENT OF EXISTING KIOSK WITH A NEW KIOSK
Application for planning permission: 2017/3499/P

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

1. The application should not be considered in isolation as the applicant intends. There are eight kiosks on Tottenham Court Road and there is a wider strategy here, which needs to be considered before any individual sites. The provision of retail kiosks (or not) needs to be considered alongside proposals for the public realm design being undertaken or to be commissioned for the same areas as part of the Council's West End Project and a consistent approach needs to be taken to the design of all the kiosks, if there are to be any at all. We are surprised that this was not drawn to the applicant's attention in the pre-application consultation and the Council was deficient in not doing so.

The community is not being given the opportunity to express their views on this wider strategy. Nor has the Council, as policy maker as well as applicant, sufficiently discharged its obligations to involve the community in this process as required by legislation introduced by the Planning and Compulsory Purchase Act 2004. This application should be refused until this takes place. A kiosk is an integral part of the public space that contains it and there should not be a piecemeal approach to the design of the public spaces and street furniture of the Council's West End Project. It should be high quality design.

2. The Association's Chairman has previously given you some history of our involvement in what we term the Council's '*Shed Culture*', the lack of progress and/or cooperation that we have experienced and the lack of any willingness to open any dialogue on who controls the licensing and management of these kiosks, the illegal advertising that they display and lack of any maintenance. No Design Statement accompanies the application but it does include a photograph of the appalling existing shed outside the Dominion Theatre and this proposal is no better.
3. Tottenham Court Road is visually congested and has been declared the worst street in London. A video was prepared for Council Members in 2010: '*Tottenham Court Road: Great Street or Great Embarrassment?*' This highlights the sad state of the public realm on Tottenham Court Road. It lists problems to be resolved for Tottenham Court Road to become a great street amongst which are its stalls and kiosks, which are considered inappropriate uses, are undesigned, shabby and sprawling and obstruct movement. This proposal does not resolve the problem – it makes it worse - and we submit the video in support of our comments. It is available at this link:
<http://www.youtube.com/watch?v=DesqbmDcyZ4>

4. You will be aware that all the kiosks on Tottenham Court Road have advertising on them. Planning permission was sought but refused and the Council has declined to take any enforcement action. Furthermore the Council has clearly demonstrated an inability to manage them properly and no management plan is included in the current application. On top of this, we have the impression that there is an intention to ruthlessly exploit the commercial potential of public space with little consideration to the damage caused to the setting of listed buildings and to the character of the Bloomsbury Conservation Area.
5. The London Borough of Camden's guidance for those making certain types of application states: "Where your proposed development is likely to generate significant public interest, a pre-application consultation statement will need to accompany your planning application."

The guidance goes on to say "A pre-application consultation statement should accompany applications for:

- major developments
- developments in sensitive areas, such as conservation areas or areas of historical importance, that are likely to generate significant public interest."

The proposal is located in the Bloomsbury Conservation Area, immediately outside the Grade II listed buildings of the Dominion Theatre and 279 Tottenham Court Road and is visually prominent in St Giles Circus. It is one of two kiosks in this location and a third is on the opposite side of Tottenham Court Road, in Westminster. All mark the gateway to the Council's West End Project and the new Crossrail station at Tottenham Court Road. They all look tacky and awful and severely damage the sensitive setting in which they are located. It is '*Shed Culture*' at its worst. There is also an ice-cream van that parks on the footway there every day. This is poor quality urban design and badly managed public space. It is contrary to NPPF, Section 7, and Policy D1 of the Council's newly adopted Local Plan.

The process of producing a pre-application consultation statement is intended to give the local community an opportunity to express their opinions on a proposed development *before an application is submitted.*"

Clearly these requirements have not been met. Neither the Bloomsbury Association or the Fitzrovia Neighbourhood Association have been formally consulted on this application nor, importantly, has the Council's West End Project team.

We object to this application on these grounds. For the same reasons we will be looking to the Council to properly fulfill its obligations to properly consult with local residential and business communities, interested parties such as its own Design Review Panel and the Bloomsbury Conservation Area Advisory Committee and to refuse all applications for the public spaces of the West End Project until this process has properly taken place and the wider strategy and design ambitions clear and agreed by all.

Stephen Heath

On behalf of The Bloomsbury Association

Copies to:

Councillor Adam Harrison, London Borough of Camden
Councillor Sue Vincent, London Borough of Camden
Kevin Stears, West End Project, London Borough of Camden
Alyce Keen, London Borough of Camden
Bloomsbury Conservation Area Advisory Committee
Fitzrovia Neighbourhood Association
Chair, Bloomsbury Association