

To: Planning Department

From:, South Bloomsbury Tenants' & Residents' Association

Date: 27.9.18

Dear Planning Dept.,

**Bupa House 15-19 Bloomsbury Way, London WC1A 2BA: App: 2018/3561/P.**

I am writing to object to this application on behalf of our residents' association. Our concerns relate specifically to the proposal of providing a restaurant that will be on the ground floor and open to the public.

The area in which the building is situated is comprised of a balanced mix of residential, office, commercial and educational uses. The site itself is in the distinctly office 'quarter' of this part of Bloomsbury/Holborn, south of Bloomsbury Way and is adjacent to the recently refurbished No.1 New Oxford St and the Post Building.

The applicant rightly notes that the context of the site is that it lies within the Bloomsbury Conservation Area. This means that special consideration should be given to preserving and enhancing the character of the area.

The building sits prominently opposite the main residential zone and faces one of the key residential streets leading north to the British Museum. The predominant character is provided by the 19<sup>th</sup> century residential mansion blocks with classical elements creating a unifying style with the earlier buildings nearby. A large amount of the residential is comprised of social housing which is home to many families, greatly contributing to a vibrant mixed community and we are keen to protect the needs and amenity of the whole neighbourhood.

This is correspondingly, a quieter part of the area, as noted in the **Bloomsbury Conservation Area Appraisal and Management Strategy 2011, Character Analysis, The North-South Routes 5.113:**

*The North-South Routes 5.113 Bury Place, Museum Street and Coptic Street connect Great Russell Street to Bloomsbury Way and New Oxford Street. **They are characterised by a combination of shopping and residential uses, and are narrower and quieter in nature than the principal streets.** Looking north along these streets, there are important glimpse views of the British Museum.*

We are concerned about loss of amenity from potential noise arising from more people entering and leaving the building by the tenants, their guests and the public as well as from people smoking outside, particularly as the accompanying licensing application from Labs Worldwide Ltd: **APP\PREMISES-NEW\091866** refers to 'delivering around the clock facilities for the modern workforce'. This would suggest there is a real risk of Labs Worldwide Plc requesting an extension to the framework hours in the future. Inevitably, and irrespective of any acoustic measurements that will be taken, there will be further noise and traffic in the area from the additional services required to run a restaurant in this already very congested location. This is a key consideration of the **Seven Dials Cumulative Impact Policy** which our area falls under.

We would also like to point out that Labs Worldwide Plc has not contacted our residents' association or engaged with us as part of the community engagement they referred to in the licensing application.

In the tightly-knit network of historic streets, each with its own individual character, we are anxious to ensure that the balance of uses is appropriate overall. In recent years, the area has seen a huge increase in the number of cafes and restaurants leading in a single line from the West End which has had the effect of blurring discrete areas and undermining their unique interest and character.

A decision to grant A3 usage at the southern end of Bury Place would make an insignificant contribution to local amenity but would represent a further encroachment on the distinct character of this part of Bloomsbury.

We would like to draw attention specifically to the principles of town planning indicated in 6.3, 9.11 and 9.34 of the **Camden Local Plan 2017**:

***6.3 Protecting amenity** is a key part of successfully managing Camden's growth and ensuring its benefits are properly harnessed. The Council will expect development to avoid harmful effects on the amenity of existing and future occupiers and nearby properties or, where this is not possible, to take appropriate measures to minimise potential negative impacts.*

***9.34 Policy TC4 Town centre uses:** This policy will be applied to proposals for these uses, whether located inside or outside of a centre. The Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours.*

***9.11:** For the Central London Specialist Shopping Areas of Covent Garden, Fitzrovia and south-west Bloomsbury, Hatton Garden, and Museum Street, sites should be sought within the designated frontages, not the wider boundary. Proposals for new retail development within these areas that are not within the designated frontage will be considered to be in an out of centre location.*

**Please can you acknowledge receipt of our submission.**

**Thank you.**

Kind regards,

Secretary, South Bloomsbury T.R.A.