



**BUPA HOUSE 15-19 BLOOMSBURY WAY**  
LONDON WC1A 2BA

CHANGE OF USE AT GROUND FLOOR LEVEL FROM THE EXISTING OFFICE USE TO PART OFFICE, PART RESTAURANT AND PART MIXED OFFICE/RESTAURANT  
Application for planning permission: 2018/3561/P

30 September 2018

The Bloomsbury Association objects to this application and endorses the representations made by the South Bloomsbury Tenants' and Residents' Association in their letter dated 27 September 2018. We wish to make the following additional comments.

**1. Use**

We are equally concerned about the gradual creepage of West End late-night entertainment uses closer to the residential enclave of Bloomsbury 'Village'.

The development proposal will erode the interface between two distinctly different areas of urban development: the Bloomsbury Conservation Area and Covent Garden. It will stimulate 24-hour use and provide encouragement for the nighttime economy to extend out of Soho and Covent Garden. It represents a significant intervention at this interface that will potentially set the tone of much of how the area will feel in years to come.

It is not 'heart of Bloomsbury' - which conjures up images of peaceful, green, leafy squares - it is the edge of Bloomsbury at a point where it collides abruptly and noisily with the fringes of the West End. It is an area that is subject to change and policy has to evolve and be applied to ensure that the impacts of that change are manageable without damage to residential amenity and Conservation Area sensitivities. Residents' experience, as evidenced by enforcement action that the Council has already taken, show that these criteria are not currently being met and that further intensification of development on this land is inappropriate.

The proposal is incompatible with the Council's ambitions to improve streets and make them a pleasanter, less intense and more human place to be. Through its most likely patron base, it will stimulate 'heart of West End' land use characteristics of Piccadilly Circus and Leicester Square to migrate to the eastern end of New Oxford Street, with an impact on the special character of Bloomsbury 'Village'.

The demand is there but it is not effectively controlled. With Westminster's restrictive planning and licensing policies operating in Soho and Covent Garden, the pressure for development of the late night economy is intense and is moving out into the 'softer' hinterland. It does not help that the London Plan identifies the New Oxford Street corridor as an area for intensification of development. New Oxford Street is unbelievable in the early hours of Saturday and Sunday mornings. The applicant's ambition for 24-hour use is noted and this type of facility is going to be extremely popular with club-goers once Crossrail brings it closer.

It is important to note the qualification in the London Plan. Policy 4.5 states: '*Further intensification of provision in areas of existing concentration should be resisted, except where this will not compromise local amenity or the balance of local land uses.*' Intensification can be taken as both the quantum and duration of use and, by extending to late night operation, the proposed development does cause material harm to the living conditions of local residents and the balance of land uses. In particular, we ask that the application of Council policies should consider most carefully the interface between the proposal site and the surrounding conservation areas. It might well be that this site is considered too remote from the core of the

West End to warrant late-night use intensification.

The immediate area is entirely designated as a 'Cumulative Impact Special Policy Area' within Camden's licensing policy. The policy exists because the area already suffers an impact from the number of licensed premises and consequently from the number of people in the area, especially at night.

The Bloomsbury Association recognise that there is a need to balance commercial and residential interests in the area to allow it to thrive. Equally, though, we are concerned that increased licensable activity has a detrimental impact on the residential population because it increases the level of noise in the area during a period when people would like to be able to sleep, and it may increase incidence of anti-social behavior too. More premises, no matter what their style of operation, will result in more noise peaks - especially in historic narrow streets such as Bury Street or those with tall buildings on both sides such as Bloomsbury Way - in a part of Central London that has little ambient sound at night. One of the key licensing objectives is "the Prevention of Public Nuisance". This is what we are trying to ensure happens through the planning assessment to ensure that the objectives of Policy A1 are met.

**2. Loss of business space**

We are also concerned at the permanent loss of employment in business space consequent upon change from Class B1(a) use to Class A3 use, which is contrary to Local Plan Policies E1 and E2.

**3. Servicing**

The proposal appears to have no dedicated service access and no refuse storage, nor is there a delivery and servicing management plan, which we would have expected to be a requirement of submission. For a restaurant of this size, refuse storage and servicing should be within the curtilage of the building. Waste containers should not be kept on the footway.

Section 14 of the application form states that there is provision for storage of waste on the premises and cross-refers to the application drawings that appear to show none, contrary to Local Plan Policy CC5, and no waste management plan is included in the application.

Given the nature of the proposed development, and the proximity to existing residential uses, timing of deliveries and refuse collection are also important and should be consistent between the conditions applied to any licensing or planning permission granted. The licensing application states that used bottles will not be collected between the hours of 19:00 and 09:00. If this proposal is approved, these should be similarly time limited by condition.

**4. Hours of opening**

No hours of opening are stated in the application. This is crucial and relevant, contrary to what the applicant states in the Section 19 of the application form. Hours of opening must be set by condition and should be back-to-back with the 'Framework Hours' stated in the applicant's parallel licensing application.

If this proposal is approved, opening should be time limited by condition as should noise emissions. We suggest Council Framework Hours should apply, namely Monday to Thursday 1000 hours until 2330 hours; Friday and Saturday 1000 hours until midnight; Sunday 1100 hours until 2230 hours. In considering suitable times for Framework Hours, the Licensing Authority has had regard to concerns expressed by residents, the licensed trade and the Metropolitan Police. These are now standard in the area.

The Association supports good quality design that will enhance Bloomsbury's streetscape, which this clearly does not. With such a demonstrable breach of the Council's planning policy, 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:*

Councillor Sue Vincent, London Borough of Camden  
David Peres da Costa, London Borough of Camden  
Secretary, South Bloomsbury Tenants' and Residents' Association  
Chair, Bloomsbury Association