



**UNIT 4, 1 BEDFORD AVENUE**  
LONDON WC1B 3AU

**PROPOSAL:** Installation of external seating area fronting onto Bedford Avenue to accommodate 8 tables, 15 chairs, 5 canvas barriers and mobile planters.  
Application for planning permission: 2018/4323/P

16 October 2018

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

1. Tottenham Court Road is subject to major public realm renewal as part of the West End Project, which was approved by Camden Council Cabinet on 21 January 2015. As part of that proposal, Bedford Avenue is to be closed at its junction with Tottenham Court Road to create a new 'pocket park'. The application hardly acknowledges this and we see no information submitted to explain how these proposals will be integrated into the Council's highway, urban realm and landscape proposals for the area.
2. Construction work has now commenced to implement the Project and any proposal such as this should be a part of and coordinated with the Project's overall public realm strategy and not something that is counter to its objectives, which is to create a public amenity and not to demarcate land for private commercial use.
3. We understand that design proposals for the pocket park are currently being developed and it would be contrary to Local Plan Policy D1 for a proposal such as this to be considered prior to design proposals for the containing space being finalized and implemented. The design of the public amenity space should determine where, and if it might be appropriate in terms of urban design, for external uses to be integrated to animate the space, with or without seating, and not the other way round.
4. We are skeptical of comments in Firstplan's covering letter referring to a pre-application meeting with a Council Highways Officer that infers agreement to the proposal. We are also skeptical of references in the same letter to planning permission having already been granted for installation of new side access door to the unit from Bedford Avenue to provide direct access to the proposed external seating area. The Officer report accompanying that application (2017/4942/P) states that the applicant's planning agent had confirmed that the side door is for fire escape only so it would not have been approved with that prospect in mind.
5. The Fitzrovia Area Action Plan highlights the severe deficiency in public space provision in the area. Of the existing public open space, 80% is on streets and footpaths. This is complemented by new and improved open spaces at St Giles Circus, Whitfield Gardens, Alfred Place, Windmill Square, on Bayley Street and at this location. It is an inappropriate balance of priority that this space should be predominantly land demarcated for private use. Open space is a civic amenity to be enjoyed by all.
6. 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 should be back-to-back with the hours to be considered in any parallel licensing application. Mindful of the proximity of residential uses in Bedford Court Mansions, if this proposal were to be approved, opening should be time limited by appropriate planning condition as should noise emissions.

The Association supports good quality design that will enhance Bloomsbury's streetscape, which this proposal, in its present form, does not. With such a demonstrable disregard of the objectives of the

Council's West End Project, we look to the Council to refuse the 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 Adam Harrison, London Borough of Camden  
Kevin Stears, London Borough of Camden  
Ben Farrant, London Borough of Camden  
Chair, Bedford Court Mansions Ltd  
Chair, Bloomsbury Association