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15 September 2023

FAO: Charlotte Meynell

Our ref: NFR/SNE/HDA/U0013257

Your ref: PP-12181222

Dear Sir / Madam

Brunswick Centre, London, WC1N 1AE ("the Site")

Town and Country Planning Act 1990 (as amended)
Planning (Listed Buildings and Conservation Areas) Act 1990
Application for Full Planning Permission and Listed Building Consent

We write on behalf of Lazari Properties 2 Limited ("the Applicant") to apply for Full Planning Permission and Listed Building Consent in respect of the proposals to convert part of the subterranean car park within the Brunswick Centre into a smart hotel.

Full Planning Permission is sought for the following:

"Change of use of existing car parking at lower ground floor to hotel use, change of use of retail unit to ancillary hotel entrance at ground floor level, alterations to lower ground floor slab, installation of plant at roof and lower ground floor level, installation of PV panels at roof level, and associated works."

Listed Building Consent is sought for the following:

"Installation of wall and fit-out relating to proposed hotel use at lower ground and ground floor level, alterations to lower ground floor slab, strengthening of structural columns, installation of plant at roof and lower ground floor level, installation of PV panels at roof level, and associated works."

Background

The Brunswick Centre is a Grade II listed building in mixed use located within the Bloomsbury Conservation Area. The Centre comprises an eight-storey building with residential units located above a public mixed use retail centre and central outdoor plaza. The Site also comprises two basement levels which are currently used for residential and commercial car parking, and plant/drainage associated with the above ground uses.

As part of their continued stewardship of the Brunswick Centre, the Applicant regularly monitor the occupation and vacancy levels of the Site. Through this continued monitoring, it has been identified that the subterranean car park at the Brunswick Centre is becoming increasingly underutilised, in part, due to a general societal shift towards more sustainable forms of transportation such as walking and cycling.

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In order to ensure the continued success of the Brunswick Centre, it is therefore proposed to repurpose part of the underutilised two-storey car park beneath the Brunswick Centre to deliver a sustainable, smart hotel, which will complement and provide increased footfall to support the existing uses at the Site.

Development Proposals

The Proposed Development seeks to deliver a subterranean, smart hotel comprising 207 bedrooms, in addition to a reception area and ancillary F&B area. The majority of the function, and floor area, of the proposed hotel will be located at basement level, with an ancillary entrance at ground floor level, and associated plant and solar PV panels located at roof level.

The Proposed Development has taken a retention-led, innovative, approach to the repurposing of the subterranean car park and as such, it is proposed to retain and lower part of the existing basement slab currently separating the upper and lower basement levels. This basement slab is required to be lowered to deliver the requisite floor to ceiling heights required for the proposed hotel.

The proposals are fully detailed, outlined and assessed within the suite of application documentation included as part of this submission.

Public Benefits

The Proposed Development would deliver a number of benefits, both in respect of the general public and local residents, which are summarised below.

- 1. A modern, fit-for-purpose, hotel use which will increase footfall, improve the visitor economy in the area and provide local employment opportunities;
- 2. A sensitive and sustainably designed scheme that respects the Brutalist architecture of the Brunswick Centre and repurposes part of the underutilised car park;
- 3. A programme of concrete repairs to the most significant parts of the building, the extent of which is to be agreed in discussion with the London Borough of Camden;
- 4. Improved cycle infrastructure, including the opportunity for the provision of residential cycle parking;
- 5. Installation of PV panels to contribute to the sustainable operation of the hotel; and
- 6. Financial contribution to improved public realm and facilities.

This package of public benefits has been developed in discussion with both the London Borough of Camden and as a result of the extensive community engagement undertaken, and the Applicant is committed to continuing dialogue with key stakeholders to bring these forward.

Pre-Application Discussions

This application for Full Planning Permission and Listed Building Consent follows extensive pre-application consultation and discussion with both Camden Council and other key stakeholders including the Designing Out Crime Officer, the Brunswick Centre Tenants' and Residents' Association, and the 20th Century Society.

The Applicant has sought to listen and respond positively to the issues raised during this engagement, in particular in relation to the impacts on residents from construction noise and dust, provision of residents' car parking and the public benefits arising from the development.

The Applicant is committed to continual, ongoing discussions with their local community and neighbours throughout the planning process, as well as into the construction and operational phases of the Proposed Development.

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Further detail in respect of community consultation and the ways in which the proposals have developed in response to feedback received is set out in Section 4 of the Planning Statement, prepared by Gerald Eve, and the Statement of Community Involvement, prepared by Kanda, and submitted in support of this application.

Conclusion

It is considered that the Proposed Development delivers upon the objectives of the London Plan and Camden Local Plan to repurpose underutilised car parking facilities, deliver improved visitor economy uses and further job opportunities for local residents.

Due regard has been had to the relevant statutory legislation is respect of Listed Buildings and Conservation Areas. The proposals seek to respect the Brutalist architecture of the Brunswick Centre, minimise the impact of the development on the surrounding Bloomsbury Conservation Area and bring forward a heritage package of concrete repairs.

Whilst a matter for the decision maker in terms of the special regard and attention they must have in taking their decision on the Application, it is also considered that the proposals preserve the building and its setting and the character and appearance of the conservation area, with reference to the statutory duties found in section 16(2), section 66(1) and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

On this basis, we consider that Full Planning Permission and Listed Building Consent should be granted accordingly.

Application Documentation

In accordance with the Camden Council's validation requirements, we have submitted the following documents through the Planning Portal, alongside this cover letter:

- 1. Application Forms and Notices, prepared by Gerald Eve LLP;
- 2. Completed Community Infrastructure Levy Form, prepared by Gerald Eve LLP;
- 3. Cover Letter, prepared by Gerald Eve LLP;
- 4. Site Location Plan and Site Plan, prepared by Axiom Architects;
- 5. Existing Plans, Sections and Elevations, prepared by Axiom Architects;
- 6. Fabric Removal Plans, prepared by Axiom Architects;
- 7. Proposed Plans, Sections and Elevations, prepared by Axiom Architects;
- 8. Design and Access Statement (including Crime Prevention Strategy), prepared by Axiom Architects;
- 9. Transport Assessment prepared by RGP;
- 10. Travel Plan, prepared by RGP;
- 11. Delivery and Servicing Management Plan, prepared by RGP;
- 12. Waste Management Plan, prepared by RGP;
- 13. Construction Management Plan Proforma, prepared by Gilbert Ash;
- 14. Cumulative Impact Area Proforma, prepared by Cumming Group;
- 15. Acoustic Report, prepared by Clarke Saunders;
- 16. Air Quality Assessment (inc. ventilation / extraction information), prepared by Phlorum;
- 17. LB Camden Air Quality Proforma, prepared by Phlorum;
- 18. MEP Drawings, prepared by PSH;
- 19. Fire Safety Statement (inc. Evacuation Strategy), prepared by Orion Fire
- 20. Energy Statement, prepared by Greengage;

- 21. Sustainability Statement (inc. WLC and CE assessments), prepared by Greengage;
- 22. LB Camden Energy and Sustainability Proforma, prepared by Greengage;
- 23. BREEAM Assessment, prepared by Greengage;
- 24. Heritage, Listed Building and Townscape Assessment, prepared by Purcell;
- 25. Flood Risk Assessment and Drainage Strategy, prepared by HTS;
- 26. Structural Report, prepared by HTS;

Earld Eve Llp.

- 27. Statement of Community Involvement, prepared by Kanda Consulting;
- 28. Hotel Evidence / Statement, prepared by Whitbread and Cumming Group;
- 29. Draft Operational Management Statement, prepared by Whitbread and Cumming Group;
- 30. Arboricultural Method Statement, prepared by James Black Associates; and
- 31. Employment and Training Strategy, prepared by Whitbread.

The requisite application fee of £526 (including the £64.00 Planning Portal administrative fee) has been paid by the Applicant on submission of this application via the Planning Portal.

We trust that we have provided all of the material required for the purposes of validation and therefore await confirmation of the registration and validation of this application shortly.

Please do not hesitate to contact Nia Fraser (0207 333 6299), Sam Neal (0203 486 3312) or Hannah Davies (0207 333 6221) of this office should you have any queries.

Yours sincerely

Gerald Eve LLP

Encs. As above