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Nia Fraser
Gerald Eve
By email

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Dear Nia,

Re: Basement Car Park, Brunswick Centre, London, WC1N 1AE

This letter is intended to be detailed pre-application advice to cover the ongoing engagement with the Development Management (DM) service on the above site since November 2022. The site is the subject of a Planning Performance Agreement (PPA) and there have been 3 meetings to date, with the last pre-application meeting held on 02/02/2023.

1. Drawings and documents

Pre-app Pack – February 2023 (prepared by Axiom Architects); Heritage Advice Note – November 2022 (prepared by Purcell Heritage Consultancy); Pre-application Sustainability Strategy – February 2023 (prepared by Greengage); Pre-application Transport Scoping Note – November 2022 (prepared by RGP).

2. Proposal

Change of use of part of existing subterranean carpark and 1 ground floor retail unit to create a c.210-bed hotel with ancillary food and beverage and back of house facilities (c. 5,000sqm), including demolition and rebuild of basement floor slab.

3. Site description

The Brunswick Centre was completed in 1972 and comprises an eight-storey building with residential units above a public shopping centre, with a central outdoor plaza. The site also has a two-storey basement car park and a basement level cinema. It is bounded by Bernard Street to the south, Marchmont Street to the west, Handel Street to the north and Brunswick Square to the east. It is designated as a Central London Neighbourhood Centre. The site is Grade II listed and lies within the Bloomsbury Conservation Area.

Site constraints

Grade II Listed Building
 Bloomsbury Conservation Area
 Article 4 – Basements
 Central London Area – Clear Zone Area
 CIL Charging Zone A
 Crossrail Contribution Zone
 CMP Priority Area
 Strategic View Cone and Wider Setting – View from Primrose Hill to St Pauls
 Strategic View Background Consultation Area from Blackheath Point
 SALP Knowledge Quarter
 Underground development constraints – subterranean (groundwater) flow and slope stability

4. Relevant planning history

PSX0104561 – Refurbishment of The Brunswick Centre; the forward extension of the existing retail units fronting the pedestrian concourse; the creation of a new supermarket (Class A1) across northern end of the pedestrian concourse; creation of new retail units (Class A1) within redundant access stairs to the residential terrace; erection of new structure above Brunswick Square for potential alternative use as retail (Classes A1, A2, and A3), business (Class B1) or as non-residential institutions (Class D1); redesign of the cinema entrance; redesign of existing steps and ramps at the Brunswick Square, Handel Street and Bernard Street entrances; removal of two existing car park entrances at pedestrian concourse level; installation of retail display windows within Bernard Street elevation; redesign of the existing southern car park stairway; replacement of waterproofing layers to the pedestrian concourse and the residential terrace; concrete repair works and introduction of new hard and soft landscaping surfaces and works – **Planning permission granted 01/09/2003**

Appeal ref. APP/X5210/W/21/3277179 against the non-determination of Certificate of Lawfulness (Existing Use) application ref. 2020/3988/P for ‘Application to certify that the existing use of the Brunswick Shopping Centre within Class E and without compliance with Condition 3 of Planning Permission: PSX0104561 is lawful’ – **Appeal dismissed 27/07/2022.**

Change of use of subterranean car park to hotel elsewhere:

Quick Parking Car Park, 112A Great Russell Street, London, WC1B 3NP

2022/5446/P – Variation of conditions 2 (approved plans), 3 (air quality), 6 (cycle storage), 9 (noise), 10 (drainage) and 14 (hotel bedroom number) together with submission of details in discharge of condition 12 (electrical plant in basement), of

planning permission ref: 2015/3605/P allowed at appeal ref: APP/X5210/W/16/3147078 dated 04/10/2016, as amended by 2020/1438/P dated 01/06/2020, for 'Change of use of part ground floor and basement levels -4 and -5 from Car Park (sui generis) to hotel (Class C1), including alterations to openings, walls and fascia on ground floor elevations on Great Russell Street and Adeline Place', namely to: increase the number of hotel bedrooms from 166 to 187 with associated internal and external alterations on ground floor elevations on Great Russell Street and Adeline Place – **Resolution to grant planning permission, awaiting signing of Deed of Variation to s106 legal agreement**

Appeal Ref: APP/X5210/W/16/3147078 following refusal of planning application ref. 2015/3605/P – **Appeal allowed 04/11/2016**

5. Relevant policies and guidance

[National Planning Policy Framework 2021](#)

[The London Plan 2021](#)

[Camden Local Plan 2017](#)

Growth and spatial delivery

Policy G1 Delivery and location of growth

Community, health and wellbeing

Policy C1 Health and wellbeing

Policy C5 Safety and security

Policy C6 Access for all

Economy and jobs

Policy E1 Economic development

Policy E2 Employment premises and sites

Policy E3 Tourism

Protecting amenity

Policy A1 Managing the impact of development

Policy A3 Biodiversity

Policy A4 Noise and vibration

Design and Heritage

Policy D1 Design

Policy D2 Heritage

Policy D3 Shopfronts

Sustainability and climate change

Policy CC1 Climate change mitigation
 Policy CC2 Adapting to climate change
 Policy CC3 Water and flooding
 Policy CC4 Air quality
 Policy CC5 Waste

Town centres and shops

Policy TC2 Camden's centres and other shopping areas

Transport

Policy T1 Prioritising walking, cycling and public transport
 Policy T2 Parking and car-free development
 Policy T3 Transport infrastructure
 Policy T4 Sustainable movement of goods and materials

Delivery and monitoring

Policy DM1 Delivery and monitoring

Camden Planning Guidance

CPG Access for all 2019
 CPG Air quality 2021
 CPG Amenity 2021
 CPG Design 2021
 CPG Developer contribution 2019
 CPG Employment sites and business premises 2021
 CPG Energy efficiency and adaption 2021
 CPG Planning for health and wellbeing 2021
 CPG Transport 2021
 CPG Trees 2021
 CPG Water and flooding 2021

Bloomsbury Conservation Area Appraisal and Management Strategy 2011**6. Assessment**

The principal planning considerations are considered to be the following:

- Land Use
- Design and Heritage
- Safety and Security
- Standard of Accommodation

- Fire Safety
- Neighbouring Amenity
- Transport
- Sustainable Design and Construction
- Flood Risk and Drainage
- Air Quality
- Refuse and Recycling
- Employment and Training Opportunities
- Health Impact

7. Land Use

Loss of Car Parking

Policy T2 of the Camden Local Plan states that the Council will support the redevelopment of existing car parks for alternative uses in order to reduce car use and lead to reductions in air pollution and congestion, and to improve the attractiveness of an area for local walking and cycling. The site is located within the Central London Area and is highly accessible in terms of public transport. The existing basement comprises an NCP operated car park, a private residents car park, and a Waitrose-operated car park. The proposals would replace the NCP car park and the majority of residents' parking spaces, with the loss of approximately 314 car parking spaces. The existing Waitrose car park to the north of the Brunswick Centre would be retained with at least 100 car parking spaces, and some residents' car parking would be retained to the south of the Brunswick Centre.

The existing NCP and residents' car parks appear to be under-used, and the site is not identified in Camden's Site Allocations Plan as being a car park which supports the functioning of the town centre. As such, the proposed redevelopment of the car park would support sustainable and efficient transport.

However, from a heritage perspective, the existing two-deck car park is an important source of the site's special interest. It embodies developing 1960s thinking about the separation of uses – traffic and consumers – on different levels. Whilst a remnant of the original parking arrangement would be retained to the northern and southern ends, it is considered that significant heritage benefit will need to be demonstrated to justify the harm to the special interest of the building from the change of use of the basement car park and associated alterations. This is discussed further in the 'Design and Heritage' section below.

It should also be noted that the existing car park includes parking spaces for residents of flats within the Brunswick Centre which are leased by Camden Council, and the

loss of these car parking spaces is subject to separate negotiation between the owner and the Council.

Loss of Retail Use and Proposed Ancillary Food and Beverage Area

The scheme proposes to utilise the ground floor retail unit 38a as the entrance to the hotel. This unit is situated within the covered passageway leading to the central plaza, close to the Marchmont Street entrance. This would result in the loss of a retail unit within the Brunswick Centre.

Condition 3 of the 2003 planning permission for the refurbishment of the Brunswick Centre (see 'Relevant planning history' section above) permits up to a maximum of 40% of the retail floorspace equating to 3386sqm (excluding the supermarket and eye-catcher unit above the Brunswick Square entrance) to be used within the previous use classes A2 (financial and professional services) and A3 (café/restaurant), in order to safeguard the retail function and character of the Brunswick Centre. A Planning Inspector concluded in an appeal decision in July 2022 (see 'Relevant planning history' section above) that this condition continues to restrict how the site may be used.

Furthermore, Camden Local policy TC2 requires a minimum of 50% of the units within the Brunswick Centre to remain in retail use and that no more than 3 consecutive premises are in non-retail use.

It is considered that the loss of one retail unit would be acceptable and would not be detrimental to the character, function, vitality and viability of the Brunswick Centre, provided that it can be demonstrated that the proposals comply with the criteria of policy TC2 and condition 3 of the 2003 planning permission as set out above.

The scheme also includes the provision of a food and beverage (F&B) area which would be ancillary to the proposed hotel use. Whilst the proposed level of food and drink provision has not been finalised, it has been confirmed at the pre-application meetings that the intention is for a relatively limited food and beverage offering which will be open to the public throughout the day.

Provided it can be demonstrated that the proposed F&B area would not harm the balance and mix of uses within the Brunswick Centre through becoming a destination in its own right, the inclusion of the ancillary F&B area is considered acceptable.

Previous iterations of the design proposed to utilise the large Boots premises on the corner of the Marchmont Street entrance for the ground floor entrance unit, but this was subsequently discounted. It should be noted that condition 11 of the 2003 planning permission for the refurbishment of the Brunswick Centre (see 'Relevant planning history' section above) prevents both the Boots unit (No. 42) and unit 38 from

being occupied by uses within the previous use class A3 (café/restaurant), in order to safeguard the amenities of the adjoining premises and the area generally. Whilst the proposed change of use of the ground floor unit would not be contrary to this condition, it should be demonstrated through the submission of an Operational Management Plan at application stage that the proposed hotel with ancillary F&B area would not harm the amenities of the neighbouring residential occupiers.

Proposed Hotel Use

In terms of new hotels and visitor accommodation, Policy E3 of the Camden Local Plan recognises the importance of the visitor economy in Camden and states that the Council will support tourism development and visitor accommodation. New, large-scale tourism development and visitor accommodation is expected to be located in Central London.

The site has a GIA in excess of 5,000sqm and the proposed hotel aims to provide around 210 bedrooms. A hotel of this size would be acceptable in this location within the Central London Area.

The principle of a hotel which is entirely subterranean has already been established within Camden, through an appeal allowed at 112A Great Russell Street on 04/11/2016 for the change of use of part ground floor and basement levels -4 and -5 from car park to hotel (see 'Relevant planning history' section above).

Whilst the site would be easily accessible by public transport, the scheme would not be able to accommodate pickup and set down points for taxis or coach parking, as required by part g) of Policy E3. However, this issue can potentially be overcome if the Transport Assessment and Transport Plan conclude that such trips would be low and that these facilities would therefore be unnecessary. This issue is discussed in further detail in the 'Transport' section below.

8. Design and Heritage

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

Camden's Local Plan is supported by CPG Design and the Bloomsbury Conservation Area Appraisal and Management Strategy.

Basement Slab

To facilitate the change of use of the existing two-deck subterranean car park to a hotel, the existing concrete slab between the two basement levels would be removed and lowered to create a single level with an increased floor to ceiling height and a void below for services. At the last pre-application meeting, structural engineering details were presented to demonstrate how the existing concrete slab could be retained through strengthening the surrounding columns and lowering the slab in sections. If subsequent structural investigations show that it is not possible to retain and lower the existing slab, then it would instead be demolished and a new slab would be constructed at the lower level.

As the Brunswick Centre is Grade II listed, the plan form and historic fabric are the principal considerations from a heritage perspective. Although the fabric involved is comparatively modern, the intervention would alter the fabric, form and use of the space of a significantly sized section of the building and cause harm to the special interest of the building.

As noted in the 'Land Use' section above, it is considered that significant heritage benefit will need to be demonstrated to justify the harm to the special interest of the Brunswick Centre from the proposals. To achieve this, a package of heritage benefits to the building will need to be assembled equalling the harm. Ideally this would take the form of an ongoing heritage maintenance programme for the building as a whole, especially annually remediating the spalling concrete. This will require first identifying the needs of the building and then proposing a programme to remedy them. It may need to be clarified whether it is the building's owner (who ultimately benefits from the proposal) or the tenant or both who should furnish the heritage benefits. The heritage maintenance programme would be secured via a Section 106 legal agreement.

Whilst the proposal to lower the existing slab rather than demolishing and rebuilding it can be seen as a conservative measure, the Council's Conservation Officer notes that both options for alterations to the concrete slab would involve the strengthening of the columns. This would prevent the columns from being left unexposed in their current form, which would be preferable in heritage terms in order to conserve the historic concrete nature of the space. It is appreciated that the existing columns within the hotel bedrooms themselves would need to be enclosed, but further work should be undertaken to explore whether some columns within the communal spaces of the hotel can be retained in their current concrete form. It is also required that a significant proportion of the new interior retain a substantially concrete "car park" character, be that in floor, ceiling, walls, exposed servicing and columns.

A structural report should be submitted with the application to demonstrate the feasibility of the chosen method of altering the basement slab and other options that have been explored and why they have been discounted.

The proposals also include the addition of two new ramps within the existing Waitrose car park to be retained to the north of the site. The installation of these ramps would be required to facilitate access to this car park and are not considered to be innately harmful to the special interest of the building.

Finally, tree protection details should be submitted to confirm that the proposals would not harm the existing tree pits within the plaza courtyard area at ground floor level above the proposed central 'street' of the hotel.

Main Entrance and Ground Floor Lobby

The existing shopfront of ground floor unit 38a is fully glazed with an internally displayed fascia sign and one projecting sign. This is consistent with the design of all ground floor units within the Brunswick Centre. The proposed shopfront would also be fully glazed, which is considered acceptable and in keeping with the existing shopfronts. The fascia signage would also need to be internally displayed as per the existing situation.

Internally, a new spiral staircase would replace the existing to the rear of the unit and two new lifts (including a larger lift to one to fit bikes) would be installed. Part of the ground floor of the unit is proposed to be removed to enable the installation of a new walk-on skylight to offer views of the reception area below. The Council's Conservation Officer has confirmed that the interiors of the shops are not generally considered to be of interest in heritage terms, and as such the removal of part of the floor to create the skylight would be acceptable in design and heritage terms.

Plant and Ducting

The proposed hotel will require servicing equipment in the form of plant and ducting for mechanical ventilation and heating and cooling. For ventilation, the intention is for the hotel to utilise the two existing basement car park exhaust shafts and louvres to the east and west of the building for the hotel exhaust air, and to utilise the two existing builders work shafts within the central plaza for the hotel fresh air intake. The use of existing service void and risers is supported and encouraged from a design and heritage perspective.

Air Source Heat Pump condenser units for heating and cooling would be located both near to the car park entrance ramp at lower basement level and also on the roof of the Brunswick Centre, adjacent to existing ventilation towers on the east and west sides of the building. It is also proposed to install solar PV panels on the flat roof to the east of the building. The location and design of such equipment will need to be carefully considered to ensure that it is as visually unobtrusive as possible and is concealed from important views of the Brunswick Centre so as to protect the special interest of

the Brunswick Centre and the character and appearance of the Bloomsbury Conservation Area. The Council's Conservation Officer undertook a site visit with the Heritage Consultant on 15th March 2023 to advise on the important views which should be protected.

Special regard has been attached to the desirability of preserving the listed building, its setting and its features of special architectural or historic interest, and to the desirability of preserving or enhancing the character or appearance of the conservation area, under s.16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013.

9. Safety and Security

Main Entrance and Access

The entrance to the hotel would be via the existing ground floor retail unit, with a lobby area only at ground floor level, leading to the main reception area at lower ground floor level. This would be accessed via lifts (including a bicycle lift) and stairs. The lobby would not be staffed and the general public would be able to freely access the lower ground floor hotel reception and food and beverage area between 07:00 and 23:00. The Metropolitan Police's Designing Out Crime Officer (DOCO) has reviewed the proposals and has raised concerns that this free public access during the day could be problematic from a safety and security perspective; however, as there would be CCTV and an intercom, it would be possible to alter the access arrangements if any issues did arise.

The developer's team held a separate meeting with the Metropolitan Police's Counter Terrorism team on 9th February 2023, and a meeting with the DOCO on 20th February 2023. The DOCO has also issued the developer's team directly with details of required security standards. At the meetings, the layers of security were discussed, and it was confirmed that, although the general public will be permitted to enter the lobby and food and beverage area, only residents with their key card will be able to access the doors leading to the communal residential corridor. There will then be a second access-controlled door leading to the room corridor and the card will again be required to enter the room. This should reduce the likelihood of tailgating and controls the amount of access a potential intruder could gain.

Cycle Storage

The DOCO had previously raised concerns that the concealed position of the cycle storage within the ground floor reception area could make the cycles vulnerable to theft, and this was raised at the last pre-application meeting. Following the developer's meeting with the DOCO, it has been confirmed that alternative locked and not visible

locations for the cycle storage within the Back of House area are being explored, which is welcomed.

Fire Exits

Fire exits are a vulnerability in terms of crime for any hotel. The emergency egress would be via the existing stairwells leading from the car park. The DOCO has requested that these doors be dual certificated for fire and security. This would include no locking furniture/handles accessible from the public realm and for the doors to be fully alarmed. This reduces the risk of Child Sexual Exploitation (CSE) where it has been reported that fire exits which are not alarmed or under CCTV surveillance have been used by organised criminal gangs to smuggle children into hotels and other establishments.

Site Security

At the developer's meeting with the DOCO, it was confirmed that Brunswick security will take ownership of patrols around the site but not within the development's footprint. The DOCO notes that there is good CCTV around the site but confirmation of locations within the hotel needs to be established. Confirmation as to whether the CCTV would be monitored 24/7 in house or remotely also needs to be established, as reaction times would be quicker if staff are monitoring on site.

Staffing levels have not yet been confirmed and the DOCO notes that this will be key in reducing the impact of any issues from a police resource stance. If a crime has been committed or likely to be committed, then emergency services should be called upon but for minor issues staffing levels should be sufficient to deal in house without affecting the level of expected service.

A full Crime Assessment will need to be submitted in support of any future planning application. The DOCO has also stated that Secured By Design accreditation should be secured by condition.

10. Standard of Accommodation

The proposed concept is for a hub-style hotel with compact room sizes but with a generous front of house offering in the lobby and F&B area. The hotel would be operated by Whitbread as a 'hub by Premier Inn' hotel.

The pre-application documents state that around 210 bedrooms with a typical size of approximately 12sqm GIA are proposed. The bedrooms would accommodate a double bed, desk and chair and en-suite shower room. The exact number and size of the proposed bedrooms has not been finalised.

There are no minimum space standards for hotel accommodation, and so there is no objection to the proposed smaller sized rooms. However, the proposal would need to meet London Plan requirements for the provision of wheelchair accessible rooms. The London Plan 2021 policy E10 requires either 10% of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of the British Standard BS8300-2:2018; or 15% of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018. It is not currently clear how many accessible rooms are proposed to be provided. As previously discussed, the location of the proposed accessible rooms will need to be considered carefully in terms of access to emergency exits in the event of a fire.

The hotel rooms would be accessed from corridors off a wide central 'street' corridor adjacent to the F&B area. The rooms would incorporate windows looking out onto 'lightwells' which would be lit with 'Big Sky' artificial circadian lighting that utilises daylight replication technology to provide a natural spectrum that mimics dawn until dusk. The proposed circadian lighting would have direct lux levels of around 1000 lux, which would significantly exceed the illuminance recommendations of 100 lux for bedrooms within the BRE target criteria. Although the principle of a windowless subterranean hotel has already been established within Camden (see 'Relevant Planning History' and 'Land Use' sections above), it is considered that the proposed inclusion of circadian lighting within the scheme would enhance the standard of accommodation of the hotel and is therefore welcomed.

A hotel is considered to be a 'noise-sensitive use'. As the entire hotel would be located below ground, it is not anticipated that the surrounding noisy environment of the retail and food and drink uses above would have an unwanted effect in terms of annoyance or sleep disturbance to hotel guests; however, enhanced noise insulation will be required to ensure that the adjacent car parks, servicing roads and subterranean Curzon cinema do not disturb guests.

11. Fire Safety

Policy D5 (Inclusive design) of the London Plan, clause (5), requires developments to be designed to incorporate safe and dignified emergency evacuation for all building users; and Policy D12 (Fire safety) requires that, in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. The policy requires that all major developments are submitted with a Fire Statement, produced by a third party, suitably qualified assessor, detailing how the development proposal will function in terms of: the building's construction; the means of escape for all building users; features which reduce the risk to life; access for fire service personnel and equipment; how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building; ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

Any formal planning application should be accompanied by a Fire Statement.

12. Neighbouring Amenity

Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered and would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise, daylight and sunlight.

Daylight / Outlook / Privacy

As the site is situated almost entirely below ground, the proposals would have no impact on daylight, sunlight, outlook or privacy of neighbouring occupiers.

Noise / Plant

Whilst the site is located almost entirely below ground, and would be situated within the retail and food and drink plaza of the Brunswick Centre, the proposal would intensify the use of the site, which could potentially result in increased noise. A Hotel Management Plan would be required to demonstrate how the hotel would operate without causing disturbance to neighbouring residents or anti-social behaviour.

As the scheme involves the installation of new plant, ventilation and extraction equipment, an acoustic report is required to be submitted with the planning application. This should include the following information:

- existing background noise levels measured over a 24-hour period (including the cumulative noise levels of all existing units)
- proposed background noise levels (including the cumulative noise levels of all proposed units)
- any proposed measures to reduce noise, fume emissions and vibration
- the system manufacturers specification of the proposed equipment to be installed, altered or replaced
- details of the method used to compile the report and examples of the calculations and assumptions made.

The acoustic report must demonstrate that the new plant would comply with Camden's noise standards (policy A4) which state that the external noise level emitted from plant, machinery or equipment shall be lower than the lowest existing background noise level by at least 10dBA, or by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises (with all machinery operating together at maximum capacity).

If this is not achievable, then the Council would expect suitable noise attenuation measures to reduce the noise levels of the proposed plant. Details of any necessary mitigation measures should also be supplied with the full planning application. Further details on noise and vibration can be found in CPG Amenity.

13. Transport

Car Parking

Policy T2 of the Camden Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. This includes limiting the availability of both off-street and on-street parking. Parking for disabled people should be provided where it can be demonstrated as necessary, taking into account existing availability for on-street parking for Blue Badge holders.

Lower case text in the London Plan Clause 10.6.23 recommends: *All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.* The Council could consider placing a Blue Badge parking bay on street, if necessary. However, at the last pre-application meeting, it was stated that the applicant would consider providing a Blue Badge parking bay in the basement. This would be in line with CPG Transport clause 5.19 and would be welcomed as the demand for on-street kerb space generally exceeds supply in central London and introducing a new Blue Badge bay would need to be at the expense of other uses.

The Council will not issue on-street parking permits in connection with new development, and the car-free status will be secured as a Section 106 planning obligation.

Trip Generation

The proposal would remove existing car parking spaces and so has the potential to remove vehicular traffic although we have no data on the usage of the parking spaces and the existing traffic generation may be small.

Trip generation for the proposed development has been assessed by reference to surveys of 'hub by Premier Inn' hotels within central London, held by RGB. While these may be as reliable (or even better) than the widely available TRICS data, it would be helpful to have site of the raw data for checking purposes.

The proposed trip generation was presented in Figure 1 of the Transport Scoping Note, reproduced below:

	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Total Daily (24-hour)		
	Arr	Dep	Two-way	Arr	Dep	Two-way	Arr	Dep	Two-way
Vehicles	0	0	0	1	1	2	13	13	26
Walk / Public Transport	23	98	121	70	52	122	743	722	1,474
All Movements	23	98	121	71	53	124	756	735	1,490

The vehicle journeys (26 two-way per day) are likely to be comprised mostly of taxi activity.

Cycle Parking

Cycle parking would need to be provided in accordance with Policy T1, cycle facilities section of CPG Transport, and the London Plan 2021.

Use Class	Long-stay	Short-stay
C1 Hotels	1 space per 20 bedrooms	1 space per 50 bedrooms

The long-stay cycle parking is proposed to be located at lower ground floor level within the reception area and reached by a cycle lift thereby providing step-free access. This would be acceptable providing the lift meets the requirements of CPG Transport clause 8.16 (2m x 2m) although for this development we would also accept the London Cycle Design Standards dimensions of 1.2m x 2.3m.

Cycle parking would need to comply with CPG Transport and semi-vertical stands would not be acceptable.

The provision of shower and changing facilities for staff who want to commute by bike would also be required.

Coach Parking and Taxi Ranks

There is no coach parking included in the proposal, nor is there scope to provide coach parking nearby. The Council would be concerned over the possibility of the hotel attracting the arrival of coach parties causing delays and safety issues in the local area. We would therefore require a S106 obligation stating that no coach party bookings will be accepted and a ban on customers being picked up or dropped off by coach at any time directly outside the hotel, in accordance with Camden Local Plan paragraph 5.60.

The 26 two-way vehicle journeys per day are likely to be mostly taxis. The applicant should provide an estimate of peak taxi activity and an assessment of suitable set-down / pickup areas as a check on whether additional provision for taxis is required.

Transport Assessment and Travel Plan

As detailed above, there is predicted to be a large number of trips associated with the development.

A strategic workplace Travel Plan and associated monitoring and measures contribution would need to be secured as a section 106 planning obligation if planning permission were granted. The Travel Plan should address staff travel to and from work, visitor travel and other aspects such as servicing and contractors undertaking work, with the focus being on giving priority to active travel.

Construction Management Plan

To minimize the impact on the highway infrastructure and neighbouring community, a draft Construction Management Plan (CMP) would need to be submitted in application stage to clarify the details of construction access, and a detailed CMP would need to be secured via a section 106 planning obligation in accordance with Policy A1 if planning permission is granted. A CMP implementation support contribution and Construction Impact Bond would also need to be secured as a Section 106 planning obligation if planning permission were to be approved. The Council has a CMP pro-forma which must be used and would need to be approved by the Council prior to any works commencing on site. The CMP pro-forma and an advice note providing further information on this financial contribution is available on the Camden website: <https://www.camden.gov.uk/documents/20142/1269042/CMP+pro+forma+03-02-2020.docx/707773f3-96ed-3c36-13ee-98978af72350?t=1580769579776>

Highway Works Contribution

The carriageway and footway directly adjacent to the site is likely to sustain significant damage because of the proposed construction works required. The Council would need to undertake remedial works to repair any such damage following completion of the proposed development.

A highways contribution would need to be secured as a section 106 planning obligation if planning permission is granted. An estimate would be prepared if a full application were to be submitted.

Public Realm Improvements

As the proposals at the site will introduce a significant number of new pedestrian and cycling trips, the applicant is required to help mitigate and manage the safe travel of the future occupiers to the site. A financial contribution for improvements to the transport and the public realm near the site will be required. This will in turn improve the safety of travel by sustainable transport modes. This financial contribution will be assessed at application stage and secured as a section 106 planning obligation.

Deliveries and Servicing

The Transport Scoping Note includes an estimate of servicing demand, based on surveys of other hotel sites. It is estimated that the hotel would require a total of 14 delivery / refuse collection visits over the course of a week, equating to 2 delivery visits per day on average. On-site dwell time is expected to be 40 minutes maximum and 30 minutes on average. Loading would occur on site, in the basement via the existing vehicular access route, and this is welcomed.

The site has a vehicle length restriction of 9.5m and while a 'test run' showed it was possible for a 10.1m vehicle to navigate through the service yard, it is proposed to use 8.3m vehicles to service the site.

To ensure that deliveries, refuse and recycling collections and other servicing vehicles carry out loading activities at the prescribed location and do not impact on the surrounding streets, a Delivery and Servicing Management Plan would need to be secured as a section 106 planning obligation if planning permission were granted. A draft Delivery and Servicing Management Plan would need to be submitted in support of any future planning application.

14. Sustainable Design and Construction

The Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and through the use of decentralised energy and renewable energy technologies. Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards. Policy CC2 requires development to be resilient to climate change by adopting climate change adaptation measures.

General requirements are outlined below, followed by bespoke comments:

MAJOR NON-RESIDENTIAL NEW BUILD (AND DEEP REFURBISHMENTS)

Applicants must submit an **energy statement** showing how the development will meet the following policy requirements:

- Follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies set out in the London Plan (2021) Chapter 9 (particularly Policy SI 2) to secure a minimum 35% reduction on site in regulated CO2 emissions below the maximum threshold allowed under Part L.
- The London Plan requires all major developments to achieve zero carbon (with at least 35 per cent reduction achieved through on-site measures). New development is expected to get as close as possible to zero-carbon on-site, rather than relying on offset fund payments to make up any shortfall in emissions. The remaining carbon emissions (to 100 per cent) are to be offset through a cash in lieu contribution.
- Non-domestic developments should achieve the minimum 'Be Lean' stage improvement of at least a 15 per cent improvement on Building Regulations from energy efficiency as set out in the London Plan 2021.
- Whole Life Carbon and Be Seen requirements should also be met.
- Local Plan policy CC1 states we will e) require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and f) expect all developments to optimise resource efficiency. Where demolition has been justified a Whole Life Carbon assessment should be submitted in line with Chapter 9 of the CPG energy efficiency and adaptation
- GLA guidance on preparing energy assessments and CPG 'Energy Efficiency and Adaptation' should be followed. The London Plan (Policy SI 3) requires developers to prioritise connection to existing or planned decentralised energy networks where feasible. Camden's Local Plan Policy CC1) requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.
- Camden's Local Plan (chapter 8) promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy. It also requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible, and this should be demonstrated through the energy statement. NB. The reduction is to be calculated against emissions at the previous hierarchy stage and NOT against the baseline emissions.
- Where the London Plan carbon reduction target cannot be met on-site, we may accept the provision of measures elsewhere in the borough or a financial contribution (charged at £95/tonne CO2/yr over a 30 year period), which will be used to secure the delivery of carbon reduction measures elsewhere in the borough.

Applicants are also expected to submit a **sustainability statement** - the detail of which to be commensurate with the scale of the development showing how the development will:

- Implement the sustainable design principles as noted in Local Plan policy CC2. This should include the submission of dynamic overheating modelling using CIBSE guidance.

- Achieve a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%) as set out in CPG 'Energy Efficiency and Adaptation'.
- The development should meet or exceed the London Plan target of 95% reuse/recycling/recovery of construction and demolition waste and 95% of excavation waste put to beneficial use.
- Referable scale applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:
 - 1) how all materials arising from demolition and remediation works will be re-used and/or recycled
 - 2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
 - 3) opportunities for managing as much waste as possible on site
 - 4) adequate and easily accessible storage space and collection systems to support recycling and re-use
 - 5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
 - 6) how performance will be monitored and reported

Energy:

Carbon reductions

The development is a substantial refurbishment so will be assessed against a target of zero-carbon with minimum Carbon emission reductions of 15% at Be Lean and 20% at Be Green stages of the Energy Hierarchy as described in [GLA Energy Assessment Guidance](#). Residual emissions will be offset and secured through a S106 agreement. Carbon Emission reductions should be clearly set out in the [GLAs Carbon Emissions Reporting spreadsheet](#). It is acknowledged that there may initially be difficulty meeting 20% Be Green reductions for non-domestic developments under the new Part L 2021.

Energy Use Intensity (EUI)

The proposed EUI and space heating demand of the development should be reported. Hotels should aim to achieve an EUI of 55 kWh/m²/year and Space Heating Demand of 15 kWh/m²/year (Section 7.13 of [GLA Energy Assessment Guidance](#)).

Renewable Energy

The Council's Sustainability team welcome the proposal to install solar PV panels on the roof of the Brunswick Centre. From a sustainability perspective, solar PVs should be maximised across the available roof space in order to reduce operational Carbon

Emissions from the development. However, the level of solar PVs that can be provided will need to be balanced against the potential heritage impacts of the installation on the special interest of the Brunswick Centre, as discussed in the 'Design and Heritage' section above.

Sustainability:

Greywater/Rainwater Harvesting

Greywater/Rainwater Harvesting is not currently proposed. The Council expect high water use developments such as hotels to include greywater and rainwater harvesting systems as per Camden Local Plan policy CC3 paragraph 8.55. This should be investigated further through a greywater and rainwater harvesting feasibility study. Where such a system is not feasible or practical, developers must demonstrate to the Council's satisfaction that this is the case.

Whole Life Carbon

The Council's Sustainability team welcome proposals to reuse the existing concrete slab between upper and lower basement levels which will lead to a significant reduction in embodied carbon associated with the development. Any changes to this aspect of the proposals should be updated accordingly within the whole life carbon assessment.

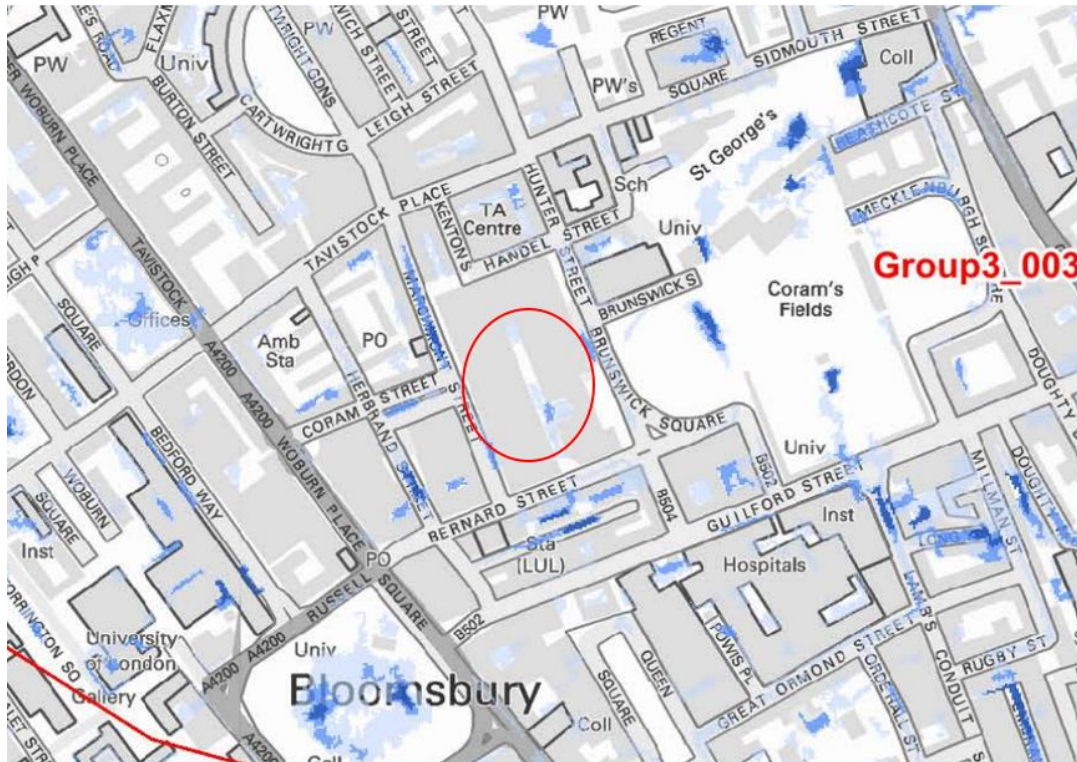
Active Cooling & Overheating

The proposals include active cooling for the development. Dynamic thermal modelling should be undertaken to demonstrate a clear need for active cooling after all preferred measures are incorporated in line with the cooling hierarchy. The cooling hierarchy and further information about the expected modelling methodology are outlined in [Section 8 of the GLA's Energy Assessment Guidance](#).

15. Flood Risk and Drainage

Camden Local Plan Policy CC3 is relevant with regards to flood risk and drainage and seeks to ensure development does not increase flood risk and reduces the risk of flooding where possible.

The proposal is not considered to be in an area at high risk of flooding. It is in Critical Drainage Area Group 3_003. Limited areas of the site are indicated as having a Low to Medium Risk of surface water flooding.



As this is a basement development, the Lead Local Flood Authority recommend consideration of potential surface water flow routes into the basement and how to mitigate this risk.

Policy Requirements

- Submit an FRA if >1ha or proposing new/enlarged basement in High Flood Risk Area as defined in the Local Plan.
- Major developments (including refurbishments) to achieve greenfield run-off rates wherever feasible.
- NPPF requires all major developments to include SuDS unless demonstrated to be inappropriate (as set out in the Ministerial Statement by the Secretary of State on 18 December 2014).
- Development should follow the drainage hierarchy in policy SI 13 of the new London Plan below:
 1. rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
 2. rainwater infiltration to ground at or close to source
 3. rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)
 4. rainwater discharge direct to a watercourse (unless not appropriate)
 5. controlled rainwater discharge to a surface water sewer or drain
 6. controlled rainwater discharge to a combined sewer

Best practice guidance recommended within the non-statutory technical standards:

- Constrain run-off volumes to greenfield run off volumes for the 1 in 100 year 6 hour event.

Documents required:

- Surface water drainage statement
- Completed drainage [Camden-GLA proforma](#)
- Drawings showing details of SuDS extent and position (including outfalls and control points)
- Microdrainage run-off (rates and volumes) calculations
- SuDS lifetime maintenance plan (site specific)
- Details of flow routes for exceedance events
- Evidence of site surveys and investigations relating to drainage
- Management of H&S risks related to SuDS design
- Evidence of capacity confirmation from Thames Water (or initial correspondence)

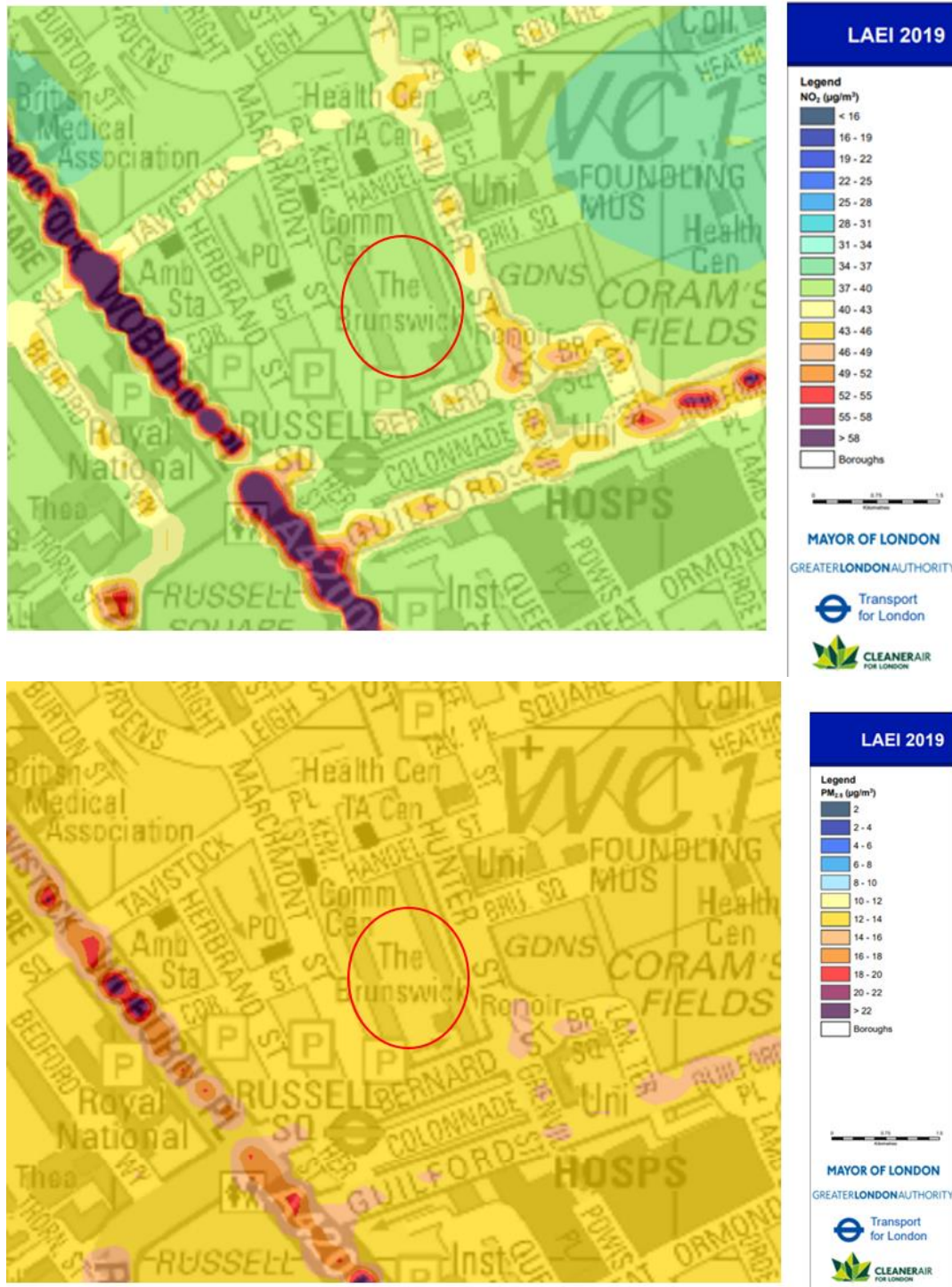
A drainage statement and a GLA London Sustainable Drainage [pro-forma](#) will be required, although it is acknowledged that some aspects of the pro-forma will not be relevant due to the scheme constraints.

16. Air Quality

Camden Local Plan policy CC4 seeks to ensure the impact of development on air quality is mitigated and ensures that exposure to poor air quality is reduced in the Borough.

Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact. Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a CMP.

The site is in an area of poor air quality with NO₂ concentrations of 37-40µg/m³. Partial mitigation is provided by the fact air intakes are planned in the centre of the development away from surrounding roads. There is particularly poor air quality potential along Hunter Street facades and the whole site is over the WHO guideline for PM_{2.5} of 10µg/m³:



The mapping above uses 2019 LAEI data for NO₂ and PM_{2.5}. The latest 2019 LAEI data is available [here](#). Detailed modelling is required using the most recent data to determine the current air quality for the site and any potential mitigation which may be required.

As the proposed building work will occur within an enclosed basement space, the mitigation of dust risk to workers needs to be carefully considered and a workable mitigation plan needs to be provided within the CMP.

Mechanical Ventilation with Heat Recovery (MVHR)

A detailed AQA should be provided (in line with guidance in CPG Air Quality) covering:

- Operational impact of development on local area
- Include AQ Neutral assessment (all developments)
- Operational impact on occupants – this should consider both NO₂ and PM_{2.5}
- Construction impacts risk assessment

- It should be noted that modelling should not predict improvements to future years (future vehicle emissions or future background concentrations).
- In line with London Council's Air Quality and Planning Guidance appropriate mitigation must be considered for residential developments if NO₂ is between 5% above or below the national objective for residential developments or schools (APEC-B) and refusal should be anticipated if more than 5% above (APEC-C). For commercial developments more than 5% above best endeavours to reduce exposure should be incorporated.
- WHO standards at the time of writing of the London Plan 2021, specifically 20 µg/m³ for PM₁₀ and 10µg/m³ for PM_{2.5}, should be considered.
- If MVHR is proposed, air inlets should be located away from busy roads or any other emission sources and as close to roof level as possible, to protect internal air quality.

Depending on the outcome of the Air Quality Assessment and modelling, then in line with London Plan Policy SI B 2) b), the development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air pollution, or mitigation required.

17. Refuse and Recycling

Camden Local Plan policy CC5 (Waste) and CPG Design are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments. Any proposal should demonstrate that the development would include facilities for the storage and collection of waste and recycling.

18. Employment and Training Opportunities

Camden Local Plan policy E3 encourages large-scale tourism development and visitor accommodation to provide training and employ Camden residents. With a view to ensuring that local people benefit from the scheme, the Inclusive Economy team would seek to secure the following employment and training opportunities for residents through a Section 106 agreement:

Construction Phase:

Apprenticeships - as the build cost for this scheme will likely exceed £3 million the applicant must recruit **1 construction apprentice paid at least London Living Wage per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG**. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre.

The applicant should advertise all construction vacancies and work placement opportunities **exclusively with the King's Cross Construction Skills Centre** for a period of 1 week before marketing more widely.

Construction Work Experience Placements - The applicant should provide a set number of work experience placements (this is one placement per 500sq m of non-residential floorspace) of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, as per section 69 of the Employment sites and business premises CPG.

Local Recruitment – The Council's standard local recruitment target is **20%**. The applicant should work with the Kings Cross Construction Skills Centre to recruit to vacancies, advertising with us for no less than a week before the roles are advertised more widely.

Local Procurement – The applicant must also sign up to the **Camden Local Procurement Code**, as per section 61 of the Employment sites and business premises CPG. Our local procurement code sets a target of **10%** of the total value of the construction contract.

End Use / Occupation Phase Opportunities:

Sections 72-75 of the CPG set out the Council's expectations about employment in the completed development

The Council will seek the provision of a specific number of end use apprenticeships as part of the Section 106 agreement.

The developer should also confirm their commitment to ensuring the site offers local employment benefits in the long term by:

- Joining the Council's Inclusive Business Network and promoting this and good employment practice to occupiers.

- Working with the council to deliver work experience placements through the hotel.
- Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally (the ESSP includes a commitment to advertising exclusively through the borough, which is welcomed).
- Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market, possibly through supported employment initiatives.

With the F&B offer, the Council's Inclusive Economy team have confirmed that they would like to see some kind of benefit for residents, such as discounts for people living in Camden.

Section 73 of the CPG provides for a Section 106 contribution to be used by the Inclusive Economy service to support employment and training activities and local procurement initiatives. This approach is supported through policy E2 of the Local Plan and applies to major commercial developments which will result in a net increase of 1,000sqm (GIA) or more of employment space including office, hotel and leisure developments.

19. Health Impact

For major developments with 1,000-9,999sqm of visitor floorspace, a rapid Health Impact Assessment should be undertaken using the NHS London Healthy Urban Development's Rapid Health Impact Assessment Tool. This assessment should be submitted in support of any future planning application. See: <http://www.healthyurbandevelopment.nhs.uk/>

20. Consultation

The proposed engagement strategy will be discussed and reviewed further at the next pre-application meeting in April to ensure that the strategy will reach the right people using the best methods, prior to formal submission of the planning application.

21. Conclusion

The proposed change of use of the site from a car park to a hotel would maximise the use of a currently under-utilised site and support the Council's aims to reduce car use and support sustainable and efficient transport. The site is considered to be an appropriate location for a hotel, and the principle of the change of use is considered acceptable, subject to confirmation that the proposals would retain a sufficient mix of retail units to satisfy policy TC2 and condition 3 of the aforementioned 2003 planning permission.

However, the proposed change of use of the basement from car park to hotel and the associated alterations including the lowering of the slab are considered to cause harm to the special interest of the Grade II listed Brunswick Centre, and further work is therefore required to produce a comprehensive package of heritage benefits to fully justify the proposed harm in terms of the public benefits of the scheme.

The location of the proposed rooftop plant and PV panels also needs to be carefully considered and designed to ensure that it does not have a detrimental impact either visually or in terms of amenity impacts for neighbouring residents.

The principle of the proposed retention and lowering of the basement slab as opposed to the demolition of the slab is supported in sustainability terms and provisionally in heritage terms, subject to evidence of its structural feasibility and provided that as much of the existing concrete finish as possible is retained and exposed within the final internal finish of the hotel.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact Charlotte Meynell on the number above.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Charlotte Meynell

Senior Planning Officer
Planning Solutions Team

Validation Checklist

Application form (Full Planning Permission)
 Application fee
 Ordnance Survey map at 1:1250 with the application site outlined in red
 Existing and proposed elevations (1:50)
 Existing and proposed floorplans (1:50)
 Existing and proposed sections (1:50)
 Demolition Plans
 Area Schedule
 Planning Statement
 Design & Access Statement, including accessibility statement, lighting details, views and photomontages
 Heritage Statement
 Transport Assessment, including Travel Plan
 Delivery and Servicing Management Plan
 Draft Construction Management Plan Pro-forma
 Draft Operational Management Plan
 Structural Report
 Tree Protection Details for existing courtyard plaza trees
 Acoustic Report
 Energy and Sustainability Statement
[Energy and Sustainability Proforma](#)
 Air Quality Assessment, including Ventilation/Extraction Assessment
[Air Quality Proforma](#)
 Surface Water Drainage Statement
[SuDS and Floods Proforma](#)
[GLA SuDS proforma](#)
 Statement of Community Involvement
 Crime Impact Assessment
 Health Impact Assessment
 Employment and Training Strategy
 Fire Safety Statement, including evacuation strategy
 Waste and Storage Collection Report