



Brunswick Centre

On behalf of: Lazari Properties 2 Limited

Date: September 2023



Brunswick Centre

On behalf of: Lazari Properties 2 Limited

Date: September 2023

NFR/SNE/HDA/U0013257

© copyright reserved 2023 Gerald Eve LLP




Contents

Page

1	Introduction	4
2	Site and Surrounding Context	9
3	Site Planning History	14
4	Consultation and Community Engagement	18
5	Description of the Proposals	23
6	Planning Policy Framework	32
7	Land Use Principles	37
8	Design, Heritage & Townscape	47
9	Energy and Sustainability	58
10	Transport, Servicing and Waste	67
11	Amenity	75
12	Technical considerations	81
13	Planning Obligations and CIL	88
14	Conclusion	91

1 Introduction

- 1.1 This Town Planning Statement ('the Statement') has been prepared by Gerald Eve LLP in support of an application for Full Planning Permission and Listed Building Consent on behalf of Lazari Properties 2 Limited ('the Applicant') for the proposed subterranean hotel at the Brunswick Centre, London, WC1N 1AE ('the Site' or 'the Centre') ('the Application').
- 1.2 This Statement identifies national, strategic, and local planning policy and guidance relevant to the Application and assesses the degree to which the development proposed accords with the statutory development plan. This Statement also identifies other material considerations relevant in determining the Application and the separate application for Listed Building Consent which is also submitted, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 1.3 The Statutory Development Plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act (2004), and therefore the development plan against which development within the London Borough ('LB') of Camden must be assessed, comprises the London Plan, being the Spatial Development Strategy for Greater London, published by the Mayor in March 2021 and the Local Development Framework ('LDF').
- 1.4 The Local Development Framework for the development proposed comprises the Camden Local Plan (2017), the Local Plan Policies Map (updated March 2019), the Camden Site Allocations Plan (September 2013) and Neighbourhood Plans. The LDF is supported by a suite of Supplementary Planning Documents called Camden Planning Guidance ('CPG') documents, which are material considerations in the determination of planning applications.
- 1.5 The Brunswick Centre is a Grade-II listed mixed-use development located within the Bloomsbury Conservation Area. The Centre comprises retail floorspace at ground floor, alongside a supermarket (Waitrose) and cinema (Curzon), residential units at upper floors, and a subterranean car park at upper and lower basement levels providing parking for residents and visitors to the Brunswick Centre including visitors to the Waitrose supermarket.

- 
- 1.6 A number of general societal shifts have impacted the use of the Brunswick Centre car park in recent years; the first being a shift towards online retail shopping accelerated by the Covid-19 pandemic, and the second being a shift towards more sustainable means of transportation.
 - 1.7 Footfall at the Centre is currently down on pre-pandemic levels (2018/2019), and market research undertaken in 2016 demonstrated that only circa. 2% of customers arrived at the Centre by car.
 - 1.8 Recent car park usage data has been recorded by the centre management team, comprising counts of cars taken at various times during the day from December 2022 and throughout 2023. Based on the understood demand for the existing car parking spaces at the Brunswick Centre and noting that further discussions are required with LB Camden as leaseholders of the residential car parking, the Applicant has taken a considered approach to ensure that the total number of proposed parking spaces (approximately 160 to serve both the Centre and residents) meets the typical demand identified through the monitoring undertaken above.
 - 1.9 When taking an average of the individual daily peaks, the maximum number of cars parked on a given day was typically 149 cars. RGP consider this figure is representative of the Site's typical requirement for car parking and represents a more appropriate quantum of retained car parking to ensure the Site does not overprovide parking or encourage car travel where alternative modes are available (in line with Camden Local Plan Policy T2). The NCP car park was also recently identified by NCP for closure as part of their restructuring.
 - 1.10 The proposals therefore seek to repurpose part of the subterranean car park at the Brunswick Centre to deliver a hotel and ancillary food and beverage area (hereafter referred to as an F&B area) in order to improve the footfall at the Centre and complement the existing uses at the Site.
 - 1.11 The Proposed Development would diversify the land uses at the Site and futureproof the occupation of the building on this basis.

1.12 For clarity, it is proposed to retain approximately 160 car parking spaces as part of the proposals, which is discussed in further detail below, and these spaces will be retained to serve both the residents and the supermarket.

1.13 As LB Camden own the leasehold of the residential units, and the residential and NCP car parking at upper and lower basement levels of the Brunswick Centre, negotiations are ongoing with the property team in respect of re-acquiring the space for the delivery of this proposal.

1.14 Full Planning Permission is sought for:

“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 the lower ground floor slab, installation of plant at roof and lower ground floor level, installation of PV panels at roof level, and associated works.”

('the Proposed Development')


1.15 Concurrently, Listed Building Consent is sought for:

“Installation of wall and fit-out relating to proposed hotel use at lower ground and ground floor level, alterations to the 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.”

1.16 The Proposed Development has been subject to extensive consultation with LB Camden including with Planning, Design, Conservation, Transport and Sustainability Officers.

1.17 In addition, the Applicant has comprehensively and proactively engaged with local residents including those living in the Brunswick Centre, as well as key local stakeholders such as the Brunswick Centre Tenants’ and Residents’ Association, and amenity societies such as the Twentieth Century Society.


1.18 The Applicant has listened to and sought to proactively respond to the elements raised by stakeholders during these consultation exercises. In particular, in respect of construction



noise / air quality, car parking, and benefits for local residents. Further detail is provided at Section 4 of this Planning Statement and in the Statement of Community Involvement, prepared by Kanda Consulting, and submitted in support of this application for Full Planning Permission and Listed Building Consent.

1.19 This Planning Statement should be read in conjunction with the plans and drawings submitted, as well as the following application documents which are submitted in support of the planning application:

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;
 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.

1.20 In summary, the following public benefits would be delivered as a result of the Proposed Development:

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. Contribution to improved public realm and facilities.

1.21 The application has been assessed in relation to relevant planning policy, guidance, and the statutory tests with which, for the reasons set out within this Statement, the Proposed Development complies, whilst also delivering public benefits. The Proposed Development should therefore be granted the Full Planning Permission and Listed Building Consent applied for.

2 Site and Surrounding Context

- 2.1 This Section describes the Site, including its listing and location within the Bloomsbury Conservation Area, and the surrounding area in respect of nearby land uses and heritage assets.

The Site

- 2.2 The Brunswick Centre is located in the London Borough of Camden and comprises an eight-storey building with residential units located above a public mixed-use retail centre and central outdoor plaza.
- 2.3 The Site also comprises a two-storey subterranean basement (upper and lower basement levels) which is currently used for residential and commercial car parking, and plant/drainage associated with the above ground uses.
- 2.4 The Site occupies an entire street block on the western side of Brunswick Square. The Brunswick Centre is bounded by Bernard Street to the south, Marchmont Street to the west, Hunter Street / Brunswick Square to the east and Handel Street to the north.
- 2.5 Designed by Patrick Hodgkinson and Sir Leslie Mann, and constructed between 1967 and 1972, the Brutalist mixed-use development replaced a series of overcrowded Georgian terraces on the estate of the Foundling Hospital.
- 2.6 The Brunswick Centre was Grade II listed on 14 September 2000 by virtue of its Brutalist architecture (listing ref. 1246230) under the site description of "1-187a O'Donnell Court and 1-212a Foundling Court and Renoir Cinema and Shops (The Brunswick Centre) and Basement Car Park and Attached Ramps and Steps and Studios".
- 2.7 The listing entry states, in full, the following:


"Two linked blocks of 560 flats, incorporating rows of shops at raised ground level over basement car -parking on two levels, with attached workshops, ramps and steps. 1967-72 by Patrick Hodgkinson for Marchmont Properties and LB Camden, completed by L Brian Ingram and T P Bennett and Partners. The first scheme prepared 1960-3 with Sir Leslie Martin, subsequent scheme developed 1963-5 by Hodgkinson, and modified 1966-8,

assisted by F D A Levitt, A Richardson, D Campbell and P Myers. Engineers McAlpine Design Group, and Robert McAlpine and Sons were the builders. Reinforced concrete, some now painted as was always intended, glazed roofs to part of each flat, otherwise roofs are flat. Flat roofs over shops form terraces serving the flats, on which are placed small 'professional studios'.

Complex megastructure of two 'A-framed' blocks, O'Donnell Court and Foundling Court, linked by a raised podium containing shops and a cinema and set over a basement car park on two levels. The outer or perimeter range of five storeys, the inner or main range of eight storeys. Most of the flats on the upper floors have one or two bedrooms, with some studios at the ends, all with glazed living room extending on to balcony, which form a stepped profile down the side of the building. One larger flat and further small flats on the lower floors of the perimeter blocks. The raised ground floor is occupied by a shopping mall, whose projecting form forms two terraces above, linked by a bridge in the early 1990s when steps from the mall were blocked. The professional chambers, intended for functions such as doctor's surgeries, are now leased as offices and workshops. Cinema facing Brunswick Square descends two levels into basement; was originally one screen, but has been subsequently simply subdivided. Basement on two levels has car parking.

The elevations are determined by the plan, with metal windows, and metal balustrading to concrete balconies. Mullions to concealed basement ventilation. Regularly spaced lift-shafts, staircases and ventilator towers reminiscent of Antonio Sant'Elia's scheme of 1914 for Milan Railway Station; there are comparisons too in the formal entrance to the shopping mall opposite Brunswick Square, where the framework of the structure is left open save for the cinema, largely glazed and with glazed doors, sentinel at its entrance. The flats are now entered via modern security doors and the internal 'A'-frame structure is exposed and makes an extremely powerful composition along the landings serving the flats. The internal finishes of the flats, shops and cinema have been inspected, and are not of special interest.

The Brunswick Centre is the pioneering example of a megastructure in England: of a scheme which combines several functions of equal importance within a single framework. It is also the pioneering example of low-rise, high-density housing, a field in which Britain was extremely influential on this scale. The scheme grew out of a theoretical project by Hodgkinson with Sir Leslie Martin for West Kentish Town (St Pancras MB), and his own



student work of 1953. This, however, was for a mat of largely four-storied maisonettes using a cross-over or scissor plan, while in section the Brunswick Centre more closely resembled Harvey Court, designed for Gonville and Caius College, Cambridge, in 1957, a design largely developed by Hodgkinson working with Martin and Colin St John Wilson. Brunswick developed the concept of the stepped section on a large scale and for a range of facilities, whose formality was pioneering. It forms an interesting group of reference with Sir Denys Lasdun and Partners' University of East Anglia (designed 1962-3) and Darbourne and Darke's Lillington Gardens, Westminster (designed 1961). More directly, the housing part of the scheme was taken over in 1965 by LB Camden, and Hodgkinson liaised with the Chief Architect, S A G Cook. His influence on the young architects working for Cook was profound, and can be seen in schemes by Neave Brown, Benson and Forsyth and others built across the borough in the 1970s - and which in their turn were celebrated and imitated on a smaller scale elsewhere. The most celebrated of these schemes is Alexandra Road by Neave Brown, of 1972-8 and listed grade II, which repeats the use of concrete and the stepped building profile, but achieves greater formality by concentrating solely on the provision of housing, set in a crescent."*

- 2.8 The Brunswick Centre is located within the Bloomsbury Conservation Area. The Bloomsbury Conservation Area covers an area of approximately 160 hectares which extends from Lincoln's Inn Fields and High Holborn to Euston Road, and from Gray's Inn Road to Tottenham Court Road.
- 2.9 The initial designation of Bloomsbury as a Conservation Area in 1968 sought to protect elements of development from the Georgian and earlier eras but excluded areas where there had been significant later redevelopment. There have been numerous subsequent extensions that have mostly reflected a growing appreciation of Victorian and Edwardian and high-quality 20th century architecture. The Brunswick Centre sits within Sub Area 12: Coram's Fields/Brunswick Centre.
- 2.10 The Site benefits from a Public Transport Accessibility Level (PTAL) of 6b, which is the highest achievable level, due to its proximity to Russell Square, King's Cross St Pancras, Euston, and Euston Square stations, which provide a range of Underground and National Rail services.


2.11 To summarise, the Site is subject to the following planning policy designations in accordance with LB Camden's Local Plan:

- Location within the Bloomsbury Conservation Area;
- Grade II Listed Status;
- Article 4 – Basements;
- Location within the Central London Area – Clear Zone Area;
- Location in the Central Activities Zone;
- MCIL 2 Central Charging Area;
- CMP Priority Area;
- Location within the Neighbourhood Centre (Brunswick);
- Strategic View : Primrose Hill summit to St Paul's Cathedral;
- Strategic View: Blackheath Point to St Paul's Cathedral;
- Strategic View: Greenwich Park Wolfe statue to St Paul's Cathedral;
- Location within a Critical Drainage Area; and
- Knowledge Quarter.

The Surrounding Area

2.12 The area surrounding the Site is characterised predominately by commercial uses containing a mix of office, retail, cafés, and restaurant uses, in addition to some residential uses. The surrounding area has a diverse townscape, characterised by the varied scale, height, age, form and design of building and streets.

2.13 The Russell Square Underground Station sits to the south of the Site, which provides Piccadilly Line services from Cockfosters to Heathrow Airport. To the east is Brunswick Square Gardens and the Foundling Museum, to the west are the estates of a number of higher education



institutions, including UCL, and to the north are some of London's major transport hubs, including Euston and King's Cross Train Stations.

- 2.14 The immediate surrounding area also falls within the Bloomsbury Conservation Area, with a number of nearby listed buildings including 3-4 Hunter Street, Former London School of Medicine for Women, 4-7 Handel Street, 39-73 Marchmont Street, 11-28 Bernard Street, Russell Square Underground Station, and Frames Coach Station and London Borough of Camden Car Park (all Grade II listed).

3 Site Planning History


- 3.1 A review of the relevant planning history for the Site has been conducted through the LB Camden planning application search function. The planning history relevant to this application is set out below.
- 3.2 There is no planning history specific to the basement levels of the Brunswick Centre. The planning history set out below relates to the Brunswick Centre as a whole.
- 3.3 Planning Permission (ref. PSX0104561) was approved on 1 September 2003 for the:

“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, as shown on drawing numbers: 2105/PL100A; /PL101A; /PL102A; /PL104A; /PL110A; /PL111A; /PL112A; /PL113A; /PL114A; /PL115A; /PL120A; /PL121A; /PL122A; /PL124A; /PL140A; /PL141A; /PL142A; /PL144; /PL150A; /PL151A; /PL152A; /PL153A; /PL154A; /PL155A (Sheet 1 of 3); /PL155A (Sheet 2 of 3); /PL155A (Sheet 3 of 3); /PL160A; /PL161A; /PL162; /PL163A; /PL164A; /PL170A; /PL171A; /PL172A; /PL173A; /PL180A; /PL181A (Sheet 1 of 2); /PL181A (Sheet 1 of 2); /PL182A; /PL183A; and /PL190; and Acoustic Consultancy Report by Buro Happold April 2001; Concrete Upgrade Options by Buro Happold April May 2001; Planning Report by Levitt Bernstein 21 May 2001; and Transport Assessment By Symonds Group December 2001.”

- 3.4 An associated Listed Building Consent (ref. LSX0104562) was approved on 1 September 2003 for the following:

“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, as shown on drawing numbers: 2105/PL100A; /PL101A; /PL102A; /PL104A; /PL110A; /PL111A; / PL112A; /PL113A; /PL114A; /PL115A; /PL120A; /PL121A; / PL122A; /PL124A; /PL140A; /PL141A; /PL142A; /PL144; /PL150A; /PL151A; /PL152A; /PL153A; /PL154A; /PL155A (Sheet 1 of 3); /PL155A (Sheet 2 of 3); /PL155A (Sheet 3 of 3); /PL160A; / PL161A; /PL162; /PL163A; /PL164A; /PL170A; /PL171A; /PL172A; /PL173A; /PL180A; /PL181A (Sheet 1 of 2); /PL181A (Sheet 1 of 2); /PL182A; /PL183A; and /PL190; and Acoustic Consultancy Report by Buro Happold April 2001; Concrete Upgrade Options by Buro Happold April May 2001; Planning Report by Levitt Bernstein 21 May 2001; and Transport Assessment By Symonds Group December 2001.”

- 3.5 There have been a number of applications to vary the 2003 permission. However, these relate principally to hours of servicing and operation (ref. 2003/2973/P, 2006/3210/P, 2012/2887/P), hot food takeaways (ref. 2004/5260/P, 2006/2114/P, 2006/2107/P), retail signage (ref. 2004/1582/P) and (ref. 2005/3070/P) and opening hours (ref. 2012/2660/P).
- 3.6 An appeal (ref. APP/X5210/W/21/3277179) was lodged on 04 October 2021 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.’



The appeal was dismissed on 27 July 2022 and as such, the 2003 permission continues to restrict the ways in which the Brunswick Centre units may be occupied. **Other Relevant Planning History**

- 3.7 Relevant planning history in respect of similar subterranean hotels in Camden is set out below for ease of reference and to demonstrate that the principle of subterranean hotels has previously been accepted in Camden.
- 3.8 An application for Full Planning Permission (ref. 2015/3605/P) was granted permission at appeal (ref. APP/X5210/W/16/3147078) at 112A Great Russell Street for the: **“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.”**
- 3.9 This application was subsequently amended by a s96a application (ref. 2020/1438/P) dated 1 June 2020 to alter the description to omit the number of hotels rooms and to insert a planning condition to secure 166 rooms.

4 Consultation and Community Engagement

- 4.1 This section summarises the outcome of the pre-application and consultation process and explains how the Proposed Development has evolved and responded to comments raised by the community and local stakeholders.
- 4.2 The National Planning Policy Framework ('NPPF'), revised July 2021, emphasises that early engagement and good quality pre-application discussion enables better coordination between public and private resources and provides improved outcomes for the community (paragraph 39). Paragraph 41 reiterates that the more issues resolved at the pre-application stage, the greater the benefits.
- 4.3 At a local level, LB Camden adopted a Statement of Community Involvement ('SCI') in 2006 and this was last revised in 2011. The SCI sets out how LB Camden will involve local people, local businesses and other key organisations and stakeholders when they prepare planning policies and consider planning applications.
- 4.4 In order to inform the Proposed Development, the Applicant and the Project Team have engaged in extensive pre-application discussions with relevant stakeholders prior to the submission of the application. The Applicant has been keen to proactively engage with all relevant parties and respond to comments raised in order to bring forward well received proposals.
- 4.5 This section summarises the outcome of the consultation process and the ways in which the Proposed Development responds to the feedback received. Full details of the consultation process are included within the Statement of Community Involvement ('SCI'), prepared by Kanda Consulting and submitted in support of the Application.

First Round of Public Consultation

- 4.6 An initial round of engagement was held at the beginning of 2023 with newsletters distributed to 2,017 addresses surrounding the Site on 15 March 2023. A website specific to the proposals was also launched on 17 March 2023 which subsequently received 96 views during the first round of consultation.

4.7 Two public exhibitions were held within a vacant unit of the Brunswick Centre on the following dates:

- Wednesday 29 March 2023: 16.00-19:00
- Saturday 01 April 2023: 11:00-14:00

4.8 The dates and times were selected in order to reach the maximum number of stakeholders as possible.

4.9 There were 88 attendees across the two exhibition dates with a range of stakeholders in attendance including representatives from:

- The Bloomsbury Association;
- Brunswick Leaseholders Association;
- Brunswick Tenants and Residents Association; and
- Cllr Adam Harrison, ward member for Bloomsbury and Cabinet Member for Sustainable Camden.

4.10 16 consultees provided feedback on the emerging proposals for the Site through the online Typeform survey and physical feedback forms.


4.11 A site visit took place on 24 March 2023 with representatives of the Brunswick Tenants and Residents Association and the Brunswick Leaseholders Association.

Second Round of Public Consultation

4.12 Following the initial round of engagement and a number of pre-application meetings with LB Camden, the Proposed Development was developed in further detail.

4.13 Consequently, a second round of public engagement was undertaken in order to receive feedback on the detailed proposals and engage further with relevant stakeholders.

4.14 Following consultation with LB Camden, further relevant stakeholders were identified at this stage to engage with as part of the formal pre-application engagement sessions, to which



correspondence was issued allowing for discussion of the proposals. These stakeholders included, but were not limited to, the following:

- The Marchmont Association; and
- Camden Police Safer Neighbourhoods Team Bloomsbury Ward.

4.15 Two further public exhibitions were held within a vacant unit of the Brunswick Centre on the following dates:

- Saturday 17 June 2023: 10.00-13.00
- Monday 19 June 2023: 16.00-19.00

4.16 There were 44 attendees (a combination of residents, visitors and workers) across the two exhibitions with 11 consultees providing feedback via the online Typeform survey and physical feedback forms


4.17 The website was visited a further 142 times in this second round of consultation, bringing the total visits to 238 since its launch in March 2023.

4.18 A follow-up meeting took place on 31 May 2023 with representatives of the Brunswick Tenants and Residents Association including representatives of the Brunswick Leaseholders Association and the King's Cross Neighbourhood Association, followed by a further meeting with the Brunswick Tenants and Residents Association on 12 June 2023.

Further Public Consultation

4.19 The Applicant has proactively engaged with the 20th Century Society throughout the pre-application process. An initial meeting took place on 4 May 2023, followed by a site visit walkaround on 6 June 2023. Following the walkaround, the proposals were presented internally to the 20th Century Society board. A formal response was received dated 30 June 2023, which confirmed that the Society had no objections to the proposals to the change of use in principle or the proposed provision of hotel access using the retail unit.

4.20 Some concerns were raised regarding the proposed lowering of the floor slab and its structural implications. Further detail in respect of this element is set out within the



Structural Report prepared by HTS and in the relevant sections of this Planning Statement below.

4.21 Of key concern to the 20th Century Society was the current condition of the concrete structure of the Brunswick Centre. The Society requested that an assessment of the condition and remedial works be undertaken. Whilst the Proposed Development relates in the main to the subterranean elements of the Brunswick Centre only, as set out below a survey of the Centre is being undertaken at the point of submission which will inform a concrete repairs package, the scope of which is to be discussed and agreed with LB Camden in due course. Further detail is set out below.

4.22 Furthermore, discussions have been held with the Designing Out Crime Officer, with an initial meeting held on 20 February 2023 and subsequent information provided via email correspondence which positively responded to outstanding queries from the initial meeting.

Outcomes of Public Consultation


4.23 The supporting Statement of Community Involvement, prepared by Kanda, provides further detail on the feedback and responses from the public consultations. However, in summary the following key themes arose from the public consultation:

- Impacts on residents from construction noise and dust;
- Provision of residents' car parking during construction and operation; and
- Public interest and demand for subterranean hotel.

4.24 The responses received have been reviewed and responses provided as part of the supporting Statement of Community Involvement. This includes reference to the supporting Draft Construction Management Plan to demonstrate mitigation of noise and dust during construction, clarity on the provision of retained parking spaces, and justification for a subterranean hotel in the Centre.

Pre-application meetings with LB Camden

4.25 Discussions have been held with LB Camden Planning and Design Officers through various pre-application meetings that have taken place from late 2022, to mid-2023. The team has worked closely with LB Camden Officers throughout and sought to respond to comments



where required, with these discussions iteratively shaping the Proposed Development brought forward as part of this Application.

4.26 The pre-application discussions have led to further consideration being given to the suitable location of the proposed hotel entrance, an in-depth review of the heritage significance of the building and the benefits that arise from the proposal, further evidencing of the sustainable slab lowering approach, suitability for Circadian Lighting, and an appropriate MEP strategy in both heritage and sustainability terms.

4.27 The process of engagement with Officers and key stakeholders has been ongoing up to the submission of the Application and will continue throughout the determination stage and following the granting of any permission.

Summary

4.28 In light of the above, it is considered that the Applicant has engaged extensively with local residents, stakeholders and the Council Officers. As such, it is believed that the proposals are in line with the pre-application consultation objectives of the the NPPF and the Camden Statement of Community Involvement Guidance.

5 Description of the Proposals

- 5.1 A full description of the Proposed Development is provided in the Design and Access Statement prepared by Axiom Architects. However, the key points are summarised in this section of the Planning Statement.
- 5.2 As set out above, the NCP car park was recently identified for closure by NCP as part of future restructuring proposals and monitoring undertaken by the Applicant, who manages the Brunswick Centre, identifies that the car park is not being fully utilised.
- 5.3 Car park usage data has been recorded by the centre management team, comprising counts of cars taken at various times during the day from December 2022 and throughout 2023.
- 5.4 Based on the understood demand for the existing car parking spaces at the Brunswick Centre and noting that further discussions are required with LB Camden as leaseholders of the residential car parking, the Applicant has taken a considered approach to ensure that the total number of proposed parking spaces (approximately 160 to serve both the Centre and residents) meets the typical demand identified through the monitoring undertaken above.
- 5.5 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 the existing uses at the Site and optimise the potential of the Site.
- 5.6 Full Planning Permission is therefore sought for:
- “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 the lower ground floor slab, installation of plant at roof and lower ground floor level, installation of PV panels at roof level, and associated works.”**
- 5.7 Concurrently, Listed Building Consent is sought for:
- “Installation of wall and fit-out relating to proposed hotel use at lower ground and ground floor level, alterations to the 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.”**



Scope of Proposals

- 5.8 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 PV panels located at roof level.
- 5.9 The scope of the proposed intervention is set out clearly on the drawings, prepared by Axiom Architects, and submitted in support of this Application for Full Planning Permission and Listed Building Consent.
- 5.10 As part of the proposals, of the approximately 530 existing car park spaces, approximately 160 car parking spaces will be retained for use by visitors to the Brunswick Centre, including Waitrose visitors, as well as the residents of the Brunswick Centre.

hub by Premier Inn (Whitbread)

- 5.11 It is anticipated that the proposed hotel will be occupied by Whitbread under their brand of hub by Premier Inn.
- 5.12 Whitbread is a FTSE 100 company which has been trading for over 275 years.
- 5.13 hub by Premier Inn is the latest concept in city centre hotels from Whitbread, introduced as part of the Premier Inn portfolio in 2014. Hub hotels are compact, contemporary, and connected in addition to delivering high-quality hotel design and comfort.
- 5.14 Features of hub by Premier Inn hotels include:
- Rooms at an affordable price in connected, central locations with high footfall;
 - Contemporary style combined with excellent connectivity;
 - Space-efficient design with compact bedrooms meticulously designed around guests needs; and
 - Modern food and beverage lounge area.

5.15 As set out above, the anticipated incoming occupier of the proposed hotel will be Whitbread under their brand of hub by Premier Inn, an established smart hotel brand. However, this is not a personal permission and the application deliverables for the Proposed Development consider the proposed change of use from an underutilised car park to a hotel to demonstrate that the proposals are practical and function more generally. Where information on the operation and management of the hub by Premier Inn is known, this is included for completeness.

Slab Lowering

5.16 There are currently two levels of subterranean car parking at the Brunswick Centre: an NCP car park at upper basement level which serves the Centre including visitors to Waitrose and a lower basement level, which is part of the leased to Camden Council and which provides residential car parking.

5.17 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.

5.18 This basement slab is required to be lowered to deliver the requisite floor to ceiling heights required for the proposed hotel. Once lowered, the upper basement level of the slab will form the proposed hotel, with the lower basement level comprising associated drainage. The basement slab, either side of the proposed hotel, will remain untouched during the process and will maintain existing floor to ceiling heights for the existing car parking.

5.19 The slab is proposed to be divided into sections with each section layered in turn onto new sleeper walls below, which are required to provide stability. Furthermore, following initial site investigations it is proposed that certain existing columns will be strengthened following the lowering of the slab to assist with structural support at this level.

5.20 In order to facilitate the lowering of the slab, it is required to locally remove small portions of the slab in the following areas:

- Areas that are already double height and as such there is no slab to lower;
- Areas where the existing slab is not suitable for lowering, such as infilled areas of

composite decking which are not part of the original building fabric;

- Areas where the void is not required below the slab, and
- Where regulation-compliant floor-to-ceiling heights are required for the plant room.

5.21 In these locations it is proposed to locally demolish the existing slabs and form any raised sections using a beam and block floor construction, supported from the existing foundations. If sections of the slab are damaged during the cutting or lowering process, sections can also be locally reinstated using a similar method to the original construction, with the construction methods of the Brunswick well-documented as set out in the Heritage, Listed Building and Townscape Assessment.

5.22 Different slab cutting techniques have been assessed based on their levels of precision, vibration, and noise levels. It is proposed to utilise a combination of core stitch drilling and angle grinding / saw cutting to successfully divide the slab whilst minimising noise and vibration.


5.23 The retention and lowering of the basement slab is an innovative construction technique, which will deliver a significant upfront embodied carbon reduction of structural materials compared to a full-scale slab demolition.

Hotel Layout and Entrance Sequence

5.24 As part of the Proposed Development, the main function of the hotel will be located at basement level and will comprise the hotel rooms, reception, F&B area, Back of House rooms, and some of the associated plant.


5.25 An existing ground floor retail unit (Unit 38a; currently Sanrizz) will be repurposed to provide access to the hotel. The implications of this change of use from a land use perspective is set out in Section 7 (Land Use).

5.26 Visitors will enter the hotel through the former retail unit before descending the stairs or via one of the two available lifts to the reception below. A glass balustrade over a void will create a visual connection between the entrance and reception to provide natural surveillance.

- 
- 5.27 Once at reception, guests will be able to check into the hotel using the self-service monitors or by liaising with a member of staff.
- 5.28 The hotel will be publicly accessible between the hours of 7am and 11pm after which it will only be accessible to guests who have checked-in and received a key card. The reception will be manned 24/7 and an intercom will enable guests arriving after 11pm to liaise with reception to access the hotel and check in, although it is anticipated that less than 1% of guests will arrive outside of the 7am and 11pm time period.
- 5.29 The F&B area will be publicly accessible during the hotel opening hours. However, access to the hotel room corridor and bedrooms will always be restricted to guests with a key card.
- 5.30 Appropriate security measures, including externally monitored CCTV and on-foot patrols will ensure the safety and security of guests and staff at the hotel. Proposed security measures were discussed with the Designing Out Crime Officer prior to submission with further details provided as part of the supporting Design and Access Statement, prepared by Axiom Architects.
- 5.31 Wayfinding and signage in respect of the proposed hotel in the immediate area does not form part of the scope of this application and will be brought forward under separate cover in due course. Signage for the entrance of the Site is proposed, however full details are not provided at this stage. We would request a suitably worded planning condition is proposed to allow for such details to be submitted in due course.

Circadian Lighting

- 5.32 Due to the subterranean nature of the proposals, Circadian Lighting is proposed within the lightwells between the proposed hotel rooms which utilises daylight replication technology to provide a natural spectrum of light from dawn until dusk following the human Circadian rhythm.
- 5.33 Multiple Circadian Lights will be positioned within the proposed lightwells to ensure the spread of light does not go below the BRE target of 100 Lux in each bedroom. Such lux levels



will therefore maintain, and in some instances exceed, natural daylight levels received by other above-ground hotel rooms.

5.34 As light is one of the largest influences on Circadian rhythm, the use of Circadian Lighting can improve health and wellbeing – especially in areas which are constricted in the provision of natural light.

5.35 An assessment has been undertaken to compare the energy requirements of Circadian lighting and standard LED lighting. This assessment confirmed that Circadian Lighting has the same power consumption as standard LED lighting and therefore no negative impact on energy efficiency.

F&B Area

5.36 An F&B Area at basement level is proposed which is ancillary to the hotel use and will be publicly accessible during the hotel's opening hours. The F&B Area will provide a limited menu and a space for hotel guests and members of the public to meet, work, and relax.

5.37 In this respect, the F&B Area is proposed to complement, rather than compete with, the existing F&B uses at the Brunswick Centre.

Heritage Proposals

5.38 As part of the proposals, a Heritage Condition Survey of the Brunswick Centre's most significant elevations and structural components is being undertaken to identify their current condition and any required repair works.

5.39 The scope of the Heritage Condition Survey was agreed with LB Camden Officers prior to its commencement.

5.40 At the time of submission, the Heritage Condition Survey is in the process of being undertaken and it is anticipated that the survey will be completed prior to determination for further discussion with LB Camden Officers.

5.41 Upon completion of the Heritage Condition Survey, the Applicant Team and LB Camden Officers will agree on a reasonable and proportionate scope of repairs works to be undertaken. The agreed repair works will be secured by way of a planning obligation within the section 106 agreement to be entered into. Further detail is set out at Section 8 of this Planning Statement and within the supporting Heritage, Listed Building and Townscape Assessment, prepared by Purcell.

Cycle Parking

5.42 The proposed scheme seeks to deliver 11 long-stay cycle parking spaces to comply with London Plan standards. These cycle parking spaces, which will comprise 1 accessible cycle space and 10 spaces within a two-tiered arrangement, will be provided internally in a safe and secure Back of House area at basement level. Access to the long-stay cycle parking would be provided via a suitably sized internal lift.

5.43 The proposed location of the long-stay cycle parking is clearly shown on drawing (ref. 4742-PA1-099 Rev.B) prepared by Axiom Architects and submitted in support of this Application for Full Planning Permission and Listed Building Consent.

5.44 5 no. short-stay external cycle parking spaces are required to be delivered in accordance with the London Plan standards. The short-stay cycle parking will comprise 3 x Sheffield-style stands capable of accommodating 6 bicycles, thereby exceeding the minimum London Plan requirements.


5.45 The short-stay cycle parking spaces will be located externally within the Brunswick Centre's public realm for ease of accessibility. An indicative area is included on the Ground Floor Plan (ref. 4742-PA1-100 Rev B) prepared by Axiom Architects and submitted in support of this application. It is anticipated that full details of the short stay cycle parking will be secured via a suitably worded planning condition.

5.46 Through the public consultation undertaken in respect of the proposals, it was identified that residents would like the scheme to deliver residents' cycle parking in addition to visitor cycle parking, as there is currently no dedicated residents' cycle parking on site.

- 5.47 The residents' cycle parking will be secured via the s106 agreement, and a suitable location agreed in discussion with LB Camden as leaseholder.

Car Parking

- 5.48 The Site currently comprises 257 car parking spaces at upper basement level and 277 car parking spaces at lower basement level (534 in total).
- 5.49 As part of the proposed change of use of the subterranean car park, it is proposed to retain approximately 160 spaces to serve visitors to the Brunswick Centre, in addition to residents.
- 5.50 Work is ongoing in respect of the reallocation of the proposed retained spaces to serve visitors to the Brunswick Centre, in addition to residents. This information is yet to be formally finalised at the point of submission and is subject to further discussion with LB Camden as leaseholders.
- 5.51 In terms of disabled car parking, the calculation of demand for disabled parking spaces as a result of the Proposed Development has been based on previous research undertaken by Whitbread considering the number reservations made for accessible rooms per annum.
- 5.52 When applied to the proposed 207 hotel bedrooms, RGP concluded that there would typically be 1 guest per night requiring a Universally Accessible (UA) bedroom. A survey was undertaken by the project Transport Consultant which demonstrated that there were three vacant disabled parking bays within 200m of the Brunswick Centre on each of the survey nights (23 and 24 March 2023). There are a total number of two disabled parking bays on Bernard Street outside Russell Square station, one on Bernard Street 70m east of the Marchmont Street junction, two on Handel Street, one on Coram Street, three on Guildford Street, and one on Marchmont Street.
- 5.53 Based on these results, RGP consider that the existing disabled parking spaces surrounding the Site would meet future requirements for disabled parking associated with the Proposed Development and no new on-street disabled car parking bays would be required as a result of the development proposals.


- 
- 5.54 Taxi pick-up and drop-off is proposed to be accommodated within the existing taxi rank on Coram Street, less than 50m from the Brunswick Centre, which has capacity for 3 no. taxis. Whitbread do not accept coach parties and therefore do not need to manage them. However, the Applicant is happy to accept a suitably worded planning condition restricting the use of coaches in connection with the Proposed Development for in the event that another operator were to come forward in the future.

Delivery and Servicing

- 5.55 All delivery and servicing activity for the proposed hotel will be accommodated on-site within the basement level service yard, with vehicles entering the Site via the existing access routes to basement level.
- 5.56 As set out further in the supporting Delivery and Servicing Plan, prepared by RGP, the proposals will seek to minimise the number of vehicle movements to and from the Site through measures such as undertaking a co-ordinated approach with other nearby Premier Inn operations to minimise impact of operations on the highway network.

Other Technical Considerations

- 5.57 The proposals seek to install a strip of PV panels on each of the top-most roofs of the Brunswick Centre. The energy produced by these PV panels will contribute to the energy supply of the hotel.
- 5.58 Greywater harvesting is also proposed to re-use shower water within the hotel to further reduce the water usage of the proposals.
- 5.59 The Proposed Development is targeting an 'Outstanding' rating under the appropriate BREEAM scheme.
- 5.60 A BREEAM Pre-Assessment Report, prepared by Greengage, is submitted in support of this application. The Report presents an indicative possible framework of credits to target a score in excess of 85% equating to a BREEAM 'Outstanding' rating.


- 
- 5.61 Finally, space heating and cooling is proposed to be provided throughout the hotel via Variable Refrigerant Flow (VRFs) air conditioning systems. The VFRs, in addition to the hot water supply for the hotel, are proposed to be powered by Air Source Heat Pumps (ASHPs) located on the roof of the Brunswick Centre with associated pipework running down through existing risers to the proposed hotel at the upper basement level.
- 5.62 The location of the ASHPs has been carefully considered to minimise the impact on the Brunswick Centre, its setting, and the surrounding Bloomsbury Conservation Area and further discussion in respect of this element of works is set out in the Heritage, Listed Building and Townscape Assessment, prepared by Purcell, and Section 9 of this Planning Statement.

6 Planning Policy Framework

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 6.2 Planning policy operates at national, regional, and local levels. At a national level, Central Government updated the National Planning Policy Framework (NPPF) in July 2021. The statutory development plan for the Site comprises, at a regional level, the London Plan (March 2021) and at the local level the Camden Local Plan (July 2017).

National Guidance – National Planning Policy Framework ('NPPF') (revised July 2021)

- 6.3 The NPPF, published in March 2012 and revised most recently in July 2021, sets out the Government's economic, environmental, and social planning policies for England. It summarises in a single document all previous national planning policy advice remaining in force. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 6.4 The NPPF provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities for their communities.
- 6.5 The NPPF establishes the presumption in favour of sustainable development. Specifically, paragraph 11 states that plans and decisions should promote a sustainable pattern of development which meets the development needs of the area, aligns growth and infrastructure, improves the environment, and mitigates and adapts to climate change.
- 6.6 As part of the Government's Levelling Up agenda, a consultation has been undertaken on proposed immediate changes to the NPPF, primarily relating to housing supply and delivery, as well as proposals on further planning policy reform.



Planning Practice Guidance (published 2014, as amended)

- 6.7 The Planning Practice Guidance was first produced and published by the Department of Communities and Local Government ('DCLG') in March 2014 to cover a range of topics which have been varied and supplemented on a number of occasions since.

The London Plan (adopted March 2021)

- 6.8 The London Plan is the overall strategic plan for Greater London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The London Plan forms the London-wide policy context within which the boroughs set their local planning agendas and forms part of the Statutory Development Plan.

Camden Local Plan (adopted July 2017)

- 6.9 At the local level, LB Camden's Local Plan (2017) was adopted by Council on 3 July 2017, replacing the Core Strategy and LB Camden Development Policies documents. This, coupled with LB Camden's Site Allocations Plan (2013) forms the local tier of the Development Plan and is therefore central to planning decisions and the control of future developments in the Borough.

- 6.10 The key planning policy designations relating to the Site are summarised below:

- Location within the Bloomsbury Conservation Area;
- Grade II Listed Status;
- Article 4 – Basements;
- Location within the Central London Area – Clear Zone Area;
- Location in the Central Activities Zone;
- MCIL 2 Central Charging Area;

- CMP Priority Area;
- Location within the Neighbourhood Centre (Brunswick);
- Strategic View : Primrose Hill summit to St Paul's Cathedral;
- Strategic View: Blackheath Point to St Paul's Cathedral;
- Strategic View: Greenwich Park Wolfe statue to St Paul's Cathedral;
- Location within a Critical Drainage Area; and
- Knowledge Quarter.

Supplementary Planning Guidance

6.11 The following LB Camden Supplementary Planning Documents (SPDs) are of relevance to this Application and form material considerations in the determination of the application:

- Camden Planning Guidance – Access for All (March 2019);
- Camden Planning Guidance – Adverts (March 2018)
- Camden Planning Guidance – Air Quality (January 2021);
- Camden Planning Guidance – Amenity (January 2021);
- Camden Planning Guidance – Basements (January 2021);
- Camden Planning Guidance – Design (January 2021);
- Camden Planning Guidance – Employment Sites and Business Premises (January 2021);
- Camden Planning Guidance – Energy Efficiency and Adaptation (January 2021);
- Camden Planning Guidance – Transport (January 2021);
- Camden Planning Guidance – Trees (March 2019);
- Camden Planning Guidance – Developer Contributions (March 2019); and
- Camden Planning Guidance – Water and Flooding (March 2019).

6.12 In addition, the Bloomsbury Conservation Area Appraisal and Management Strategy (adopted 18 April 2011) has been referred to in respect of the Proposed Development.

Emerging Camden Local Plan

6.13 Camden Council are in the process of preparing a new and updated Local Plan. In order to inform the development of this new Local Plan, the Council held a call for views from 4 November 2022 to 13 January 2023.

6.14 The responses received as part of this engagement will feed into the preparation of the draft Local Plan, which is anticipated to be published for consultation later in 2023.

6.15 The Local Development Scheme published in October 2022 confirms that the adopted Local Plan continues to hold full weight in planning decisions.


Further Statutory Planning Legislation

6.16 Due to the Site's location within the Bloomsbury Conservation Area and the Brunswick Centre's Grade II listed status, statutory legislation regarding the historic environment is relevant to this application for Full Planning Permission and Listed Building Consent.

6.17 Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require that when considering whether to grant Listed Building Consent or Planning Permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

6.18 Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 sets out the statutory duty imposed on the decision maker in considering whether to grant planning permission for the development within a Conservation Area, which states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.

Key Planning Considerations



6.19 The key planning considerations for the Proposed Development are:

- a) Land Use;
- b) Design, Heritage and Public Benefits;
- c) Energy and Sustainability;
- d) Transport and Servicing; and
- e) Any other material planning considerations.

6.20 In the following section of the Planning Statement, we address each of the key planning considerations noted above, in addition to other policy considerations, having regard to the Development Plan as a whole, and any wider material considerations.

7 Land Use Principles

- 7.1 This section assesses the Proposed Development in terms of land use in respect of the delivery of hotel floorspace in the Bloomsbury Area and the redevelopment of part of the underutilised subterranean car park in planning policy terms.
- 7.2 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to date Local Plan should be approved. For the reasons set out within this chapter, the Proposed Development is in accordance with the key policies of the Camden Local Plan and is therefore acceptable in principle.

Use Class E

- 7.3 In summer 2020, the Government introduced an Amendment to the Use Classes Order to introduce flexibility via the new Class E to reduce the need for change of use planning permissions. Class E covers a range of town centre uses including offices, retail, restaurants, creches, clinics etc. On 1 September 2020, all planning units being used lawfully within those uses (with no restrictive covenants) automatically transitioned into Class E. However, for ease of reference and understanding of the existing use being carried on, the existing commercial units will be referred to via their former Use Classes.

Proposed Land Uses

- 7.4 The following uses are considered against national, regional, and locally policy below:
- Proposed Hotel (Use Class C1)
 - Loss of Retail (Former Use Class A1)
 - Loss of Car Park (Sui Generis)
- 7.5 The proposals comprise the repurposing of part of the existing two-storey subterranean car park for use as a smart hotel with ancillary F&B use. As the F&B use is ancillary to the hotel, a café / restaurant use has not been assessed separately. Through the conversion of existing floor area, the scheme will lead to the loss of a single retail unit at ground floor level, and a proportion of the existing car parking at basement level.

7.6 For ease of reference, the existing and proposed land use areas are set out in the table below:


Land Use	Existing (GIA sqm)	Floorspace lost (GIA sqm)	Floorspace retained (GIA sqm)	Floorspace proposed (GIA sqm)	Net Change (GIA sqm)
Hotel (Use Class C1)	0	0	0	6,538	+6,538
Retail (Former Use Class A1)	555.50	-555.50	0	0	-555.50
Car Park (Ancillary to residential and commercial uses)	17,637	-11,886	5,751	0	-11,886
Total	18,192.50	-12441.50	5,751	6,538	-5903.5

7.7 The overall net change floorspace figure is negative, due to the fact that the slab lowering will lead to a loss of GIA floorspace at Basement Level -2 as a result of the reduction in floor-to-ceiling heights.

Proposed Hotel Use (Use Class C1)


7.8 Policy SD4 of the London Plan states that the unique international, national, and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions (such as hotels) and local uses, should be promoted, and enhanced.

7.9 Policy E10 of the London Plan states that London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions and supporting infrastructure. As part of this, a sufficient supply and range of serviced accommodation should be provided and maintained.

- 
- 7.10 Policy GG2 of the London Plan requires developments to make the best use of land to create successful mixed-use places. Parts C and D of Policy GG2, in particular, require a proactive approach to the intensification of the use of land to support, inter alia, higher density development in sustainable locations, in addition to a design-led approach to determine the optimum development capacity of sites.
- 7.11 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, which is expected to be concentrated within Central London.
- 7.12 Supporting Paragraph 2.52 of the Local Plan reconfirms that the Council will support Central London as a focus for Camden’s future growth of, inter alia, hotels.
- 7.13 Furthermore, supporting Paragraph 5.1 of the Local Plan states that Camden has a large number of jobs in the health sector, hotels and restaurants, legal services, and transport and distribution, and that the Council wants to maintain and build on this success by encouraging investment that supports business growth to create further job opportunities for Camden residents.
- 7.14 Supporting Paragraph 5.56 of the Local Plan states that visitor numbers to London are expected to continue to increase, creating demand for more hotels and other overnight accommodation, particularly in Central London.

Policy Assessment

- 7.15 The scheme proposes a 207-bed hotel within the subterranean level of the Brunswick Centre, which is located within the CAZ in close proximity to a number of sustainable transport links.
- 7.16 The majority of the function of the hotel will be located at basement level, comprising bedrooms, Back of House areas, an ancillary F&B area, and other ancillary facilities. The proposed entrance will be located at ground level, allowing access to the basement level via both stairs and lifts.
- 7.17 A draft Operational Management Plan is submitted as part of the application which provides information relating to the proposed operation of the hotel use. At this stage, a preferred




hotel operator has been identified, Whitbread, who would operate the proposed scheme under the hub by Premier Inn brand.

- 7.18 Pedestrian access to the hotel reception would be either via Marchmont Street, or through the Brunswick Centre, with easy access to public transport via Russell Square Underground Station, and Euston and King's Cross St Pancras Stations, both approximately 10-minutes' walk away, as well as numerous bus routes.
- 7.19 The Camden Local Plan is clear that the Council supports investment in land uses, such as hotels, which support business growth. The Proposed Development would deliver a hotel use within an existing mixed use retail Centre, thereby contributing to the continued success of the Brunswick Centre by offering a use that complements the Centre, in addition to increasing footfall to increase visitor spending, and creating further job opportunities for Camden residents.
- 7.20 A supporting Hotel Evidence Statement, prepared by Whitbread, has been submitted as part of this Application for Full Planning Permission and Listed Building Consent. In summary, the statement confirms the requirement for the proposed hotel use at the Site to assist in meeting increasing demand for such uses within a Central London location.
- 7.21 Furthermore, as set out in the supporting Employment and Training Strategy, prepared by Whitbread, the proposed hotel would provide jobs for local residents both during the construction and operational phases.
- 7.22 Overall, the proposed hotel would provide a significant boost to the local economy, through the increase in visitor accommodation, facilities which complement the wider area, and improved job opportunities within the local area. Therefore, the proposed hotel and ancillary facilities accord with the relevant NPPF, London Plan policies, and Camden Local Plan policies.

Loss of Retail

- 7.23 Paragraph 86 of the NPPF seeks to support the role that the town centre plays at the heart of local communities, taking a positive approach to their growth, management, and adaptation.

- 
- 7.24 London Plan Policy SD6 seeks to promote and enhance the vitality and viability of London's varied town centres. The policy recognises that a mix of vibrant town centre uses should be delivered (Part F).
- 7.25 Policy E9 of the London Plan advises that a successful, competitive, and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported.
- 7.26 Policy E9 (Part F) states that development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable, in addition to residential development.
- 7.27 Policy E1 (Part I) of the Local Plan states that the Council recognises the importance of employment generating uses, including tourism.
- 7.28 Policy E3 states that the Council will support tourism development and visitor accommodation, in particular, tourism development located in Central London.
- 7.29 Policy E3 (Parts H and I) states that all tourism development and visitor accommodation must:
- Not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems; and
 - Not lead to the loss of permanent residential accommodation.
- 7.30 Policy TC2 of the Camden Local Plan advises that the Council promote successful and vibrant centres throughout the borough to serve the needs of residents, workers, and visitors. The Council will seek to protect and enhance the role and unique character of each of LB Camden's Centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located. Furthermore, the policy seeks to protect a high proportion of retail uses along primary and secondary frontages, but would accept a broader range of town centre uses which support the viability and vitality of the Centre.

7.31 Policy TC2 further states that the Council will seek to retain convenience shopping for local residents in Camden's Neighbourhood Centres and will ensure that development in them does not harm the function character or success of that Centre.

7.32 The Council's expectations for the mix and balance of uses within frontages for each designated centre are set out in Appendix 4 of the Local Plan. Specifically in relation to the Brunswick Centre, there is a requirement for a minimum of 50% of the units in each individual frontage to remain in retail use, with a maximum of 25% of former A3, A4 and A5 former use classes combined in each individual frontage, and no more than two consecutive food, drink, or entertainment uses. The Camden Local Plan and the Camden Town Centres and Retail Supplementary Planning Guidance identifies retail uses as Use Class A1 (Shops).


Policy Assessment

7.33 The Proposed Development seeks the conversion of a single existing retail unit at ground floor level to create a suitable entrance for the hotel use which will be located at basement level. The existing retail unit is located within the concourse of the Brunswick Centre, and is currently occupied by Sanrizz.

7.34 Although the proposal will lead to a loss of an existing retail unit, the conversion will allow for the introduction of a hotel to the Site, which in turn will help to improve the vitality and vibrancy of the retail sector through the increased footfall and visitor spending.


7.35 The introduction of the proposed hotel, in lieu of the existing retail unit, will also help in promoting an increase in job opportunities in the local area, whilst promoting a complementing use to the Brunswick Centre, which will not undermine the function or character of the Centre.

7.36 Following pre-application discussions with Planning Officers, Officers confirmed that the loss of one retail unit to accommodate the proposals 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.

- 
- 7.37 The Proposed Development has been assessed against Policy TC2 which refers to the former Use Class Order on a without-prejudice basis.
- 7.38 In respect of Policy TC2, there are five existing units located along the individual frontage on which Sanrizz Unit is located. Of the five existing retail units, four (including Sanrizz) are currently in former A1 (retail) use. One unit is in A3 (F&B) use, however, the main entrance fronts the internal Brunswick concourse and there is limited accessibility on the Sanrizz elevation.
- 7.39 Nevertheless, including this A3 use and even with the loss of the Sanrizz unit to the proposed hotel, 3 of the existing units (or 60%) will remain in former A1 (retail) use which complies with Policy TC2. There would also not be more than 2 consecutive A3, A4 or A5 uses on this individual frontage in line with Policy TC2.
- 7.40 Overall, the conversion of a single retail unit, for the introduction of a hotel use to the Brunswick Centre, is considered acceptable and will allow for a suitable alternative town centre use on the Site which will complement the existing function of the centre, whilst also promoting further footfall which will enhance the vitality of the centre.
- 7.41 The change of use of the existing retail unit would also not be in contravention of Policy TC2 of the Camden Local Plan. Therefore, the proposed hotel and ancillary facilities accord with the NPPF, London Plan policies, and Camden Local Plan policies.


Loss of Car Parking

- 7.42 Policy SD7 (Part C2) of the London Plan states that Development Plans should recognise the capacity of low-density commercial sites, car parks and retail parks for mixed-use redevelopment.
- 7.43 Policy T6 of the London Plan states that car-free development should be the starting point for all development proposals in places that are well-connected by public transport.
- 7.44 Policy D2 (Part A2) of the London Plan confirms that the density of development proposals should be proportionate to the Site's connectivity and accessibility by walking, cycling and public transport to jobs and services (including PTAL).

- 
- 7.45 Supporting text for Policy D2 states, at Paragraph 3.2.3, that “in general, the higher the public transport access and connectivity of the Site, and the closer it is to a Town Centre or station, the higher the density and the lower the car parking provision should be” and “the ability to support higher densities through encouraging increased levels of active travel should be taken into account.”
- 7.46 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.
- 7.47 The subterranean car park at the Brunswick Centre is not identified in Camden’s Site Allocations Plan as a car park which supports the functioning of the Town Centre.

Policy Assessment

- 7.48 The Proposed Development comprises the conversion of part of the existing car park at basement level, to the proposed hotel. The upper car parking level is currently let to NCP, with the lower car parking level leased to Camden Council for use by residents. The proposed conversion will lead to the loss of approximately 370 car parking spaces, with the retention of approximately 160 spaces to serve the Brunswick Centre, including visitors to Waitrose, as well as local residents.
- 7.49 Footfall at the Brunswick Centre is down on pre-pandemic levels and the NCP car park was recently identified for closure. Monitoring undertaken by the Applicant also identifies that two levels of car parking are not being fully utilised.
- 7.50 When taking an average of the individual daily peaks, the maximum number of cars parked on a given day was typically 149 cars. RGP consider this figure is representative of the Site’s typical requirement for car parking and represents a more appropriate quantum of retained car parking to ensure the Site does not overprovide parking or encourage car travel where alternative modes are available (in line with Camden Local Plan Policy T2).


- 
- 7.51 The Site has a PTAL Rating of 6b, which demonstrates excellent accessibility to the existing Site via modes of sustainable transport. Furthermore, developments within areas of high PTAL ratings would normally promote car-free schemes.
- 7.52 There is policy support at a national, regional, and local level for the redevelopment of underutilised car parks to provide high-density and optimised mixed-use developments within highly accessible locations. The proposed scheme will promote an appropriate complementing use within a mixed-use centre within in a highly accessible location to optimise and make better use of the space.
- 7.53 The proposals have also sought to retain approximately 160 car parking spaces which are considered to meet the current demand requirements for the Centre including visitors to the existing Waitrose, and local residents. These parking spaces will remain accessible from the existing access ramps to the basement level from ground level.
- 7.54 Discussions are ongoing with LB Camden as leaseholders of the car park in respect of the retained spaces, as well as the spaces which will be retained for use during construction.
- 7.55 Overall, the conversion of part of the existing underutilised car parking will promote a complementary use within an existing mixed-use centre in a highly accessible location. The proposals to convert the underutilised car parking into a car-free smart hotel therefore aligns with London Plan Policies SD7, D2 and T6, and Camden Local Plan Policy T2.

8 Design, Heritage & Townscape

- 8.1 This section considers the Proposed Development against relevant national, regional, and local design and heritage planning policy and guidance relating to designated heritage assets, Conservation Areas, and townscape.


Design

- 8.2 The Government attaches great importance to the design of the built environment in the NPPF with Chapter 12 referring to achieving well designed places.
- 8.3 Paragraph 126 of the NPPF states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 8.4 At paragraph 130, the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, which would function well over the lifetime of the development.
- 8.5 At the regional level, London Plan Policies D1 to D3 apply to the design and layout of the development and set out a range of urban design principles relating to the quality of the public realm, the provision of convenient, legible movement routes and the importance of designing out crime.
- 8.6 Policy D5 of the London Plan states that development proposals should achieve the highest standards of accessible and inclusive design and that proposals should deliver high quality people focused spaces, which are convenient and welcoming with no disabling barriers.
- 8.7 Policy D11 of the London Plan states that development proposals should maximise building resilience and minimise potential physical risks. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity, and help mitigate its effects.
- 8.8 At a local level, Policy D1 of the Camden Local Plan seeks to secure high quality design in development and to ensure that new developments are attractive, safe, and easy to use.

- 
- 8.9 Policy D1 sets out the characteristics LB Camden expect to secure high-quality development proposals, including those which, inter alia, are sustainable in design and construction, are inclusive and accessible for all and which preserve strategic and local views.
- 8.10 Supporting text at paragraph 7.16 of the Camden Local Plan states that *“any adaptation of existing buildings must respond to access needs whilst ensuring that alterations are sympathetic to the building’s character and appearance.”*
- 8.11 Supporting Paragraph 7.61 states that the listed nature of a building does not preclude the development of inclusive design solutions and the Council expects sensitivity and creativity to be employed in achieving solutions that meet the needs of accessibility and conservation.
- 8.12 Supporting Paragraph 7.18 of the Camden Local Plan states that design should create safe and attractive places and be designed to prevent crime and antisocial behaviour.

Policy Assessment

- 8.13 The majority of works required to be undertaken in respect of the Proposed Development are located within the basement levels and therefore internal. The only external works forming part of the development are the change of use of 1 no. ground floor retail unit to serve as the hotel entrance (and associated fenestration changes), and the installation of ASHPs and PV panels on the roof of the Brunswick Centre.
- 8.14 The internal layouts of the proposed hotel have been designed to meet the appropriate needs of future guests, whilst also providing a high-quality innovative design for the location of the use, as well as being sympathetic to the heritage asset (discussed further below).
- 8.15 The proposed hotel entrance, located at ground floor level, has been suitably designed into the Centre with minimal structural intervention required. The only external changes relate to minor fenestration changes to the doors and signage. Internally, the ground floor unit is proposed to be refurbished to provide accessible access to the hotel reception at basement level, as well as a suitably designed void between ground and basement level to allow for natural surveillance.
- 8.16 The principles of accessible design have been incorporated into the proposals. Access into the hotel entrance from ground floor will allow for step free access with visitors able to access the hotel lobby, located at basement level, via steps or lifts. Once within the hotel demise,



step-free access will be possible throughout the scheme. In addition, evacuation lifts will be installed at appropriate fire exits to assist with step-free access in these locations during such emergencies.

8.17 With regards to accessible rooms, 10% have been proposed as accessible as part of the scheme. These have been located to allow for appropriate access from the hotel lobby.

8.18 The lifts from the hotel entrance will also serve to transport bicycles down to basement where the long-stay bicycle storage is located.

8.19 During the development of the scheme, consideration has also been given to the necessary security measures that are required for a hotel use, including 24/7 CCTV coverage, with discussions also being held with the Designing Out Crime Officer. Further details on the proposed security measures can be found at Chapter 16 of the supporting Design and Access Statement, prepared by Axiom Architects.

8.20 Due to the proposed hotel bedrooms being located below ground, careful consideration has been given to how the rooms are appropriately lit. The scheme proposes the use of Circadian Lighting within lightwells adjacent to the bedrooms which will mimic natural light cycles in line with natural Circadian rhythms.

8.21 This innovative approach provides appropriate lighting for guests, whilst also promoting greater lux levels than may be achieved by some hotel bedrooms via natural daylight above ground.

8.22 The Proposed Development proposes the use of sustainable and innovative construction techniques to lower the existing basement slab level in line with Policy D1 of the Camden Local Plan which seeks to deliver proposals which are sustainable in both design and construction.

8.23 At roof level, the location of the ASHPs and PV panels have been carefully considered by the Design Team to minimise impact of the works on the street scene and surrounding Conservation Area. This is discussed in further detail below as part of the Heritage Section of this document.

8.24 Enclosures are required to be installed around each side of the rooftop condensers to minimise vibration transfer due to their proximity to residents. The enclosures have been designed to match the existing louvres at the Brunswick Centre for consistency.

8.25 The Proposed Development seeks to deliver an innovative, high-quality, accessible smart hotel utilising sustainable construction techniques. The proposals therefore accord with the relevant national, regional, and local level guidance in respect of design and is therefore acceptable in principle.


Heritage & Townscape

8.26 This section provides consideration concerning heritage matters at the Site. It deals with the proposals in the context of the statutory tests within the Planning (Listed Buildings and Conservation Areas) Act 1990. The following sections of this Act are relevant, in addition to Section 38(6) of the Planning and Compulsory Purchase Act 2004:

- a. **Section 16** - which places a statutory duty on the decision maker in considering whether to grant listed building consent for any works to have **special regard** to the desirability of preserving a building or its setting or any features of special architectural or historic interest which is possesses;
- b. **Section 66** - which requires that **special regard** is given to the desirability of preserving listed buildings or their settings or any features of special architectural or historic interest which is possesses; and
- c. **Section 72** - which states that **special attention** shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.
(our emphasis added)

8.27 The Government has attached great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made on the basis of the significance of the asset, and the harm (substantial or less than substantial) that the proposal would cause to the significance of the heritage asset.

8.28 Under paragraph 194 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected,



including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

8.29 Following on from this, paragraph 195 sets out that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal taking account of the available evidence and any necessary expertise and that such an assessment should be taken into account when considering the impact of a proposal on a heritage asset.


8.30 Paragraph 199 of the NPPF states that *“when considering the impact of a Proposed Development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*

8.31 Paragraph 202 of the NPPF states that (our emphasis added), *“where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*

8.32 Policy D8 of the London Plan states that development proposals should address visual impacts, including an analysis through long-range, mid-range, and immediate views from the surrounding streets; architectural quality and materiality of an exemplary standard and consider nearby heritage assets and their settings.

8.33 Policy HC1 of the London Plan further reinforces this point, and requires that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and taking their surroundings into account.

8.34 The supporting text at Paragraph 7.1.3 of the London Plan emphasises that:



“Ensuring the identification and sensitive management of London’s historic assets, in tandem with the promotion of the highest standards of architecture, will be essential to maintaining the blend of old and new that contributes to the capital’s unique character.”

- 8.35 Supporting Paragraph 7.1.7 of the London Plan identifies that heritage significance is defined as the *“archaeological, architectural, artistic or historic interest of a heritage asset.”* The paragraph goes on to state that *“development that affects heritage assets and their settings should respond positively to the assets’ significance, local context, and character to protect the contribution that settings make to the assets’ significance.”*
- 8.36 At a local level, the importance of the built heritage to the character of the London Borough of Camden is formally acknowledged in the Camden Local Plan.
- 8.37 Policy D1 (Part B) of the Camden Local Plan states that the Council requires development to preserve or enhance the historic environment and heritage assets in accordance with Policy D2 (Heritage).
- 8.38 Policy D2 of the Local Plan states that the Council will preserve and where appropriate, enhance LB Camden’s rich and diverse heritage assets and their settings. In respect of designated heritage assets, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage assets unless the public benefits of the proposal convincingly outweigh that harm.
- 8.39 Policy D2 continues that the Council will require development with Conservation Areas to preserve or, where possible, enhance the character or appearance of the area.
- 8.40 Policy D2 further confirms that the Council will resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building.
- 8.41 Supporting Paragraph 7.56 of the Local Plan states that *“historic buildings including those in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving while preserving their special interest and ensuring their long-term survival. In assessing applications for retrofitting sustainability measures to historic buildings the Council*

will take into consideration the public benefits gained from the improved energy efficiency of these buildings.”

- 8.42 Supporting Paragraph 7.56 of the Local Plan continues that the considerations of improved energy efficiency and climate resilience will be weighed up against the degree to which proposals will change the appearance of the building, taking into consideration the scale of harm to appearance and significance of the building.
- 8.43 Supporting Paragraph 7.62 of the Local Plan states that proposals that reduce the energy consumption of listed buildings will be welcomed provided they do not cause harm to the special architectural and historic interest of the building or group.

Policy Assessment

Significance

- 8.44 The Brunswick Centre is Grade II listed building and is located within the Bloomsbury Conservation Area. A number of other Grade II listed buildings are located within close proximity to the Site. These include 3-4 Hunter Street, Former London School of Medicine for Women, 4-7 Handel Street, 39-73 Marchmont Street, 11-28 Bernard Street, Russell Square Underground Station, and Frames Coach Station and London Borough of Camden Car Park (all Grade II listed).
- 8.45 A supporting Heritage Assessment, prepared by Purcell, has been submitted in support of this application for Full Planning Permission and Listed Building Consent.
- 8.46 As required by paragraph 194 of the NPPF, the Heritage Statement provides a full commentary regarding the significance of the designated heritage assets within the Site. This includes the Bloomsbury Conservation Area. For the designated Brunswick Centre, the elements of high, moderate, and neutral significance are set out, as well as any elements that currently detract from the significance of the building or its setting.
- 8.47 Colour-coded plans identifying the areas of significance of the Brunswick Centre are included as part of the supporting Heritage, Listed Building and Townscape Assessment, prepared by Purcell.

8.48 As the Brunswick Centre is of relatively recent architectural design with trades and construction methods which are well understood, the supporting Heritage Statement concludes that the Site has low evidential value.

8.49 The Heritage Statement states that the Brunswick Centre has high significance in respect of its historic value as a result of its design which evokes a Georgian Street, its stepped terrace as a popular Post-War device and its presence and a megastructure.

8.50 The assessment concludes that all rooftops are of low architectural and aesthetic value and the street elevations are of medium architectural and aesthetic value. Furthermore, the car park spaces themselves are of low architectural and aesthetic value.


8.51 With regards to the Conservation Area, the supporting Heritage Statement considers that the visual appearance and architectural identity of the Brunswick Centre makes a significant contribution to the wider Bloomsbury Conservation Area, although its character is not the predominant architecture in the area (Victorian and Georgian).

Views

8.52 In consultation with LB Camden Officers, a total of 8 no. Verified Views have been assessed as part of the supporting Heritage Assessment, prepared by Purcell. All Verified Views have been carefully selected in order to demonstrate the range of ways in which the elements of the Proposed Development located on the roof of the Centre would be seen.


8.53 The following views are therefore set out and assessed:

- 1) Brunswick Square Gardens;
- 2) Landscaped area at the junction of Bernard Street and Brunswick Square;
- 3) From Russell Street looking north through the Brunswick precinct;
- 4) From Russell Square Station;
- 5) Coram Street;
- 6) Looking southeast down Marchmont Street;
- 7) From Handel Street looking west; and
- 8) From Brunswick Square looking northwest.

- 
- 8.54 The supporting report highlights that the condensers have been carefully sited to minimise impact on the Brunswick Centre and to protect its contribution to the wider Bloomsbury Conservation Area. The roof parapet and proposed condenser enclosures also further reduce the visibility of the new units from the public realm.
- 8.55 Nevertheless, in some views, the condensers will be seen as minor additions at the base of the service towers on either side. The impact on the listed building and the Conservation Area are considered minimal although a level of harm is acknowledged to both.
- 8.56 As such, it is concluded that the proposals will result in some low adverse harm on the listed building and the wider Conservation Area, with such harm suitably mitigated by the public benefits of the scheme, including heritage benefits described below.

Heritage Impact Assessment

- 8.57 The Proposed Development has paid special regard to the significance of the heritage assets, and sought to minimise works to the building that are considered of high significance. As set out in the supporting Heritage Listed Building and Townscape Assessment, the main elements of the works are undertaken to areas of low significance, and although in some instances will change the plan form (i.e. lowering of the car park slab), those areas will still remain an important feature of the building. Appropriate mitigation is proposed for such areas by retaining elements of the current circulatory systems and areas of parking intact.
- 8.58 With regards to the roof level, the impact of the proposed condenser units, as mentioned above, is considered to cause some low adverse harm for the small number of views in which part of the structures will be seen from the public realm. In addition, the proposed PV panels will not be visible from the wider Conservation Area due to their location behind the existing roof parapet walls. Their installation will not impact the listed building or the Conservation Area, and their addition is considered beneficial against wider planning policy for climate change mitigation and resilience. However, in heritage terms, Purcell concludes that their installation will have a neutral heritage impact.
- 8.59 Overall, the Proposed Development is considered to constitute less than substantial harm at the lesser end of that category to the listed building and the Bloomsbury Conservation Area.



In accordance with the NPPF, in particular Paragraph 202, consideration is therefore given to the public benefits that would be delivered as part of the Proposed Development.


8.60 With regards to public benefits, the Proposed Development seeks to deliver the following:

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. Contribution to improved public realm and facilities.

8.61 As set out above, it is proposed a programme of concrete repairs will be undertaken to areas of the building of highest significance.

8.62 A condition survey, the scope of which was agreed previously with Officers, is in the process of being undertaken at the point of submission. This condition survey will serve to establish the baseline condition of the Brunswick Centre which will inform the programme of concrete repairs to the building.

8.63 A schedule of defects and repairs will be produced to accompany the condition survey. This schedule of defects and repairs will identify the nature of each defect, in addition to its location and quantity, a recommendation for its repair, and a photographic reference. Each defect will be attributed a priority rating which may assist in informing the concrete repair strategy and phasing of any future works.


- 
- 8.64 Finally, it is proposed to produce a complete set of survey drawings identifying the defect locations. These survey drawings will assist in understanding the distribution and variety of repair types.
- 8.65 Upon completion of the Heritage Condition Survey, the Applicant Team and LB Camden Officers will agree on a reasonable and proportionate scope of repairs works to be undertaken. The agreed repair works will be secured by way of a planning obligation within the section 106 agreement to be entered into.
- 8.66 Whilst the proposals will result in less than substantial harm to the listed building and Conservation Area, it is considered that this harm is outweighed by the public benefits set out above, including inter alia, the proposed concrete repairs package.

Summary

- 8.67 In accordance with the NPPF, the Proposed Development has established the relative significance of the designated heritage asset on the Site and sought to sustain the contribution of that asset to the Bloomsbury Conservation Area.
- 8.68 In line the guidance set out within NPPF, it is concluded that the proposals would have less than substantial harm to the heritage asset at the lesser end of that category, which would be sufficiently outweighed by the public benefits arising as a result of the proposals.
- 8.69 It is therefore considered that the proposals comply with the relevant paragraphs of the NPPF, notably Paragraph 202, and with the relevant criteria of Camden's Local Plan policies.
- 8.70 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.
- 8.71 The Proposed Development is therefore concluded to be in accordance with heritage and townscape policies at national, regional and local levels.

9 Energy and Sustainability

- 9.1 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. The NPPF contains some of the Government's policy on climate change.
- 9.2 Paragraph 119 of the NPPF encourages development that makes as much use as possible of previously developed or 'brownfield' land.
- 9.3 Paragraph 154 states that new development should be planned for in ways that help to reduce greenhouse gas emissions, such as through its location, orientation and design and that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.
- 9.4 Paragraph 157 of the NPPF states that new development should take account of landform, layout, building orientation, massing, and landscaping to minimise energy consumption.
- 9.5 Policy GG2 of the London Plan states that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land by, inter alia, prioritising sites which are well-connected by existing or planned public transport; and planning for good local walking, cycling and public transport connections.
- 9.6 Policy GG6 of the London Plan states that to help London become a more efficient and resilient city, those involved in planning and development must support the move to a low carbon circular economy and ensure that buildings and infrastructure are designed to adapt to a changing climate.
- 9.7 Policy G5 of the London Plan states that major development proposals should contribute to the greening of London by including urban greening and incorporating high quality landscaping, green roofs, green walls, and nature based sustainable drainage.
- 9.8 Policy SI 7 of the London Plans states that resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved



by the Mayor, waste planning authorities and industry working in collaboration. Developments should have adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

9.9 Policy SI 7 (Part A5) sets a target of each of the following for waste and material streams:

- a) Construction and demolition – 95 % reuse / recycling / recovery
- b) Excavation – 95 % beneficial use


9.10 London Plan Policy D3 (Part 13) requires that development proposals should aim for high sustainability standards and should take into account the principles of the circular economy.


9.11 Part A of the London Plan Policy SI 2 states that major development should be net zero carbon. Greenhouse gas emissions should be reduced, and annual and peak energy demands minimised in accordance with the following energy hierarchy:

- a) Be lean: use less energy and manage demand during operation;
- b) Be clean: exploit local energy resources and supply energy efficiently and cleaning;
- c) Be green: maximise opportunities for renewable energy on site; and
- d) Be seen: monitor, verify and report on energy performance.

9.12 Part C of the London Plan Policy SI 2 sets the following targets to be achieved by major developments:

- a) Net zero carbon with at least 35 per cent reduction in carbon emissions beyond Part L of the 2021 Building Regulations; and
- b) Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures.

- 
- 9.13 Policy SI 2 (Part C) continues that where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
- a) Through a cash in lieu contribution to the borough's carbon offset fund; or
 - b) Off-site provided that an alternative proposal is identified, and delivery is certain.
- 9.14 Policy SI 2 (Part E) requires major development proposals to calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e., unregulated emissions.
- 9.15 In support of the policies of the London Plan, the Mayor's SPG on Sustainable Design and Construction provides the context for all developments and provides a mechanism for addressing climate change impacts through new developments.
- 9.16 Supporting Paragraph 2.5.9 of the SPG states that in order to maximise the reduction in carbon dioxide emissions across London, boroughs should establish a planning related carbon dioxide reduction fund and set a price at which the carbon dioxide short fall will be calculated.
- 9.17 The London Plan sets a nationally recognised non-traded price of £95/tonne which boroughs may use to collect offset payments.
- 9.18 The Sustainable Design and Construction SPG (2014) also provides detailed guidance and preferred standards for achieving sustainable design and construction.
- 9.19 At a local level, through Local Plan Policy CC1, LB Camden requires all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. In addition, there is a requirement for all major development to demonstrate how the London Plan targets for carbon dioxide emissions have been met.

- 
- 9.20 In support of these objectives LB Camden requires the location of development and mix of land uses to minimise the need for car travel, support energy efficiency improvements to existing buildings and the optimisation of energy efficiency.
- 9.21 Local Plan Policy CC2 requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures.
- 9.22 Local Plan Policy CC2 also promotes the incorporation of sustainable design and construction measures within developments.
- 9.23 In January 2021 LB Camden updated the Camden Planning Guidance (CPG) 'Energy Efficiency and Adaptation' to ensure that the Council's commitment to reducing carbon emissions is achieved.

Policy Assessment

Energy

- 9.24 A supporting Energy Statement, prepared by Greengage, has been submitted as part of this Application for Full Planning Permission and Listed Building Consent. In addition to a completed LB Camden Sustainability and Energy proforma for major applications. These documents provide a comprehensive assessment of the proposal in energy terms, with a summary provided below.
- 9.25 The Proposed Development has prioritised a reduction in energy demands at the 'Be Lean' stage of development through both passive and active measures in line with Part A of the London Plan Policy SI 2.
- 9.26 The 'Be Lean' measures proposed, through measures such as highly energy efficient ventilation and lighting, are anticipated to result in an estimated reduction in regulated CO₂ emissions of 5.5 tCO₂/year, equating to a 9% reduction when compared to the Part L 2021 baseline emissions rate.

- 9.27 This 9% figure is driven principally by the demands of the Proposed Development on domestic hot water (DHW), and also the limited ability of incorporating Be Lean measures (such as passive measures) due to the location of the Proposed Development in an existing underground space. If the DHW consumption is excluded from the calculation, the emissions savings obtained through energy efficiency measures would be 25%.
- 9.28 In terms of the 'Be Clean' Stage, the potential to connect the Proposed Development to an existing or proposed decentralised energy network has been assessed. However, it was concluded by the Project Team that no networks are within an appropriate distance to successfully achieve this.
- 9.29 Instead, it is proposed to utilise a series of Variable Refrigerant Flow (VFRs) systems to provide efficient space heating and cooling to the Proposed Development, and a centralised system of Air Source Heat Pumps (ASHPs) is specified for the domestic hot water generation.
- 9.30 The proposed form of domestic hot water system can, however, facilitate a connection to any future heat network, thereby futureproofing the proposals.
- 9.31 The 'Be Green' appraisal undertaken by Greengage demonstrated that the most appropriate low or zero carbon technologies for the Proposed Development are ASHPs for hot water generation and VFR systems for space conditioning.
- 9.32 The ASHPs and VRF systems are all-electric, thereby contributing to the future transition to zero carbon.
- 9.33 Furthermore, it is proposed to install PV panels onto the highest roof of the Brunswick Centre as a means of on-site renewable electricity generation. The energy created by these PV panels will contribute to fulfilling some of the energy demands of the proposed hotel.
- 9.34 Greengage predict the 'Be Green' technologies will reduce the CO₂ emissions on-site by 16.1 tCO₂/year, equating to a 27% reduction over the Part L 2021 baseline case.
- 9.35 In terms of the 'Be Seen' Stage, the Proposed Development will be designed with sub-metering to enable post-construction monitoring and reporting of energy performance.

9.36 Greengage have also utilised the 'Be Seen' methodology to report on the predicted Energy Use Intensity (EUI) and space heating demand of the Proposed Development.

9.37 Overall, the proposed scheme aims to achieve a carbon reduction of 36% when compared to the Part L 2021 baseline, which exceeds the London Plan target. The scheme has sought to maximise carbon reduction where possible and would provide a cash-in-lieu contribution to achieve the remaining carbon reduction required to meet the net-zero carbon target.

Sustainability (including bespoke WLC and CE assessments)

9.38 During pre-application discussions, it was agreed with Planning Officers that, due to the nature of the proposal, it would not be feasible to undertake comprehensive Circular Economy and Whole Life Carbon Assessments. As such, bespoke assessments for these principles have been included in the supporting Sustainability Statement, prepared by Greengage. A summary of the sustainability measures is provided below, with further details included within the supporting statement.

Whole Life Carbon

9.39 Given the nature of the development as largely a fit-out of the existing space, a bespoke Whole Life Carbon Assessment has been undertaken on the new materials to be installed in the building to understand their impact and identify any potential areas for carbon savings as the design progresses.

9.40 By re-using the existing slab, in lieu of demolition and replacement with a new floor slab, the embodied carbon of the development is reduced significantly. This innovative approach will result in a significant upfront embodied carbon reduction of structural materials compared to a full-scale demolition.

9.41 Although it is not possible to directly compare the embodied carbon total of the proposal to generic industry benchmarks, the GLA residential benchmark is considered to be the closest match to a hotel use. When the proposals are compared to the embodied carbon levels A1-A5 for a new residential building, the proposal surpasses the aspirational GLA benchmarks.

9.42 Greengage have identified the following measures which can be integrated into the design to further reduce the embodied carbon of the Proposed Development:

- 1) Potential to include further recycled content within the strengthening steel;
- 2) Opting for exposed services and a higher ceiling height in lieu of installing a suspended ceiling; and
- 3) Use of recycled carpets.

Circular Economy

9.43 The Proposed Development makes use of an existing space and many retained materials, thereby demonstrating a high level of circularity.

9.44 The reuse of the existing slab aligns with the GLA requirements for designing out waste, as demolition material has been reduced, and the requirement for new material avoided.

9.45 During the slab lowering process some of the basement slab is required to be removed, either to facilitate the slab lowering or achieve Building-regulation compliant floor-to-ceiling heights for the plant area.

9.46 The Design Team are exploring options for the reuse of this demolition material into the proposed structure and will continue to investigate possibilities throughout the detailed design process.

9.47 The proposed fit-out materials have been selected in accordance with the following key Circular Economy principles:

- 1) Building in layers – ensuring that different parts of the building are accessible and can be maintained and replaced where necessary;
- 2) Designing out waste – ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build, and reuse of secondary products and materials;
- 3) Designing for longevity;
- 4) Designing for adaptability or flexibility;
- 5) Designing for disassembly; and

6) Using systems, elements or materials that can be reused and recycled.

9.48 During construction, a Site Waste Management Plan will be produced by the main contractor, which will aim to follow waste reduction measures in line with both the waste hierarchy and circular economy principles.

9.49 During operational use, a supporting Waste Management Plan, prepared by RGP, has been submitted as part of the application and sets out the how waste management will be undertaken during the operation of the hotel. This includes the provision of an appropriately sized bin store which will accommodate general and recyclable bins.

Water Usage

9.50 The Proposed Development seeks to incorporate water efficient design measures to minimise overall water consumption on site.


9.51 The measures proposed to be implemented to achieve savings in water consumption include water-efficient sanitaryware including dual-flush toilets, low flow, aerated taps, and showers. Monitoring and control measures for water efficiency will also be installed.

9.52 Furthermore, a greywater harvesting system is planned to be installed and used for WC flushing by collecting water from showers, thereby reducing water demand.

9.53 Consideration was given as to whether appropriate SuDS measures could be incorporated into the development. However, as there are no areas of soft landscaping, and minimal intervention above ground level, it was deemed that SuDS measures were not feasible for the scheme.

Air Quality

9.54 Further details on Air Quality are provided in Section 11 of this document. In summary, the Proposed Development is expected to generate low volumes of traffic, which will not impact on the existing receptors of the Site. In addition, the scheme is expected to be Air Quality Neutral in relation to building and transport emissions.



9.55 During construction, careful consideration is given to the mitigation of dust with appropriate measures incorporated into the draft Construction Management Plan, prepared by Gilbert Ash.

BREEAM


9.56 A BREEAM Pre-assessment Report has been undertaken by Greengage on the Proposed Development and has been submitted as part of this application.


9.57 As set out within the report, the building has been assessed under BREEAM Refurbishment and Fitout 2014 and is targeting an 'Outstanding' rating, exceeding the LB Camden policy requirements.

9.58 Based on the above, it is considered the proposals accord with the relevant national, regional, and local level policy and guidance in respect of sustainability matters and is therefore acceptable in principle.

10 Transport, Servicing and Waste

- 10.1 This section assesses the Proposed Development against the national, regional, and local planning policy in respect of transport matters.
- 10.2 Chapter 9 of the NPPF sets out the Government’s policies with regards to transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and will contribute to the wider sustainability and health objectives.
- 10.3 One of the key objectives of the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. Furthermore, paragraph 106 states that planning policies should aim for balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure education and other activities.
- 10.4 Paragraph 104 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.
- 10.5 Paragraph 110 of the NPPF states it should be ensured that: opportunities to promote sustainable transport modes have been taken, transport has safe and suitable access for all users and any significant impacts on the highway network have been assessed.
- 10.6 Paragraph 111 of the NPPF states that:
- “Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*
- 10.7 Paragraph 152 of the NPPF states that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.

- 
- 10.8 London Plan Policy T4 states that transport assessments should be submitted with development proposals to fully assess impacts on transport networks when required in accordance with national or local guidance.
- 10.9 London Plan Policy T4 (Part B) states that Travel Plans and Delivery and Servicing Plans will also be required having regard to Transport for London guidance.
- 10.10 London Plan Policy T5 (Cycling) requires development proposals to help remove barriers to cycling and create healthy environments in which people choose to cycle. This can be achieved through the provision of cycle parking in accordance with the minimum standards.
- 10.11 London Plan Policy T6 (Car Parking) restricts car parking in line with levels of existing and future public transport accessibility and connectivity. Appropriate disabled persons parking for Blue Badge holders should, however, be provided, as required by Policy T6.5 of the London Plan.
- 10.12 London Plan Policy T6.4 states that, in the CAZ and locations of PTAL 4-6, any on-site provision of car parking for hotel and leisure uses, should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing.
- 10.13 At a local level, LB Camden Local Plan Policy T1 prioritises walking, cycling and public transport in the borough. In pursuance of this LB Camden will seek to ensure developments improve the pedestrian environments. The delivery of improved walkways, wide pavements and safe and permeable development is supported.
- 10.14 Policy E3 (Parts F and G) of the Camden Local Plan state that all tourism development and visitor accommodation must:
- Be easily reached by public transport; and
 - Provide any necessary pickup and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary.
- 10.15 Policy T1 (Part H) states that LB Camden will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the




London Plan (Table 6.3) and design requirements outlined within LB Camden's Transport CPG (2021).

- 10.16 LB Camden Local Plan Policy T2 states that the Council will limit the availability of parking and require new development in the borough to be car free.
- 10.17 Supporting Paragraph 5.60 of the Local Plan states that new tourism developments should be easily reachable by public transport.
- 10.18 Camden Transport Strategy was adopted in 2019 and aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably.

Policy Assessment

- 10.19 The Proposed Development comprises the introduction of a hotel use at the Brunswick Centre, which in turn will lead to a reduction of approximately 370 parking spaces at basement level, with the retention of approximately 160 parking spaces for Waitrose and residents.
- 10.20 Footfall at the Centre is currently down on pre-pandemic levels (2018/2019) and market research undertaken in 2016 demonstrated that only circa 2% of customers arrived at the Centre by car. In addition, the NCP car park was recently identified by NCP for closure as part of their restructuring.
- 10.21 In line with London Plan Policy T4, a Transport Assessment and a Travel Plan for the proposed hotel use have been prepared by RGP and are submitted in support of this Application for Full Planning Permission and Listed Building Consent.
- 10.22 The Site benefits from the highest Public Transport Accessibility Level (PTAL) of 6b due to its location in close proximity to a number of bus, TfL and National Rail services.
- 10.23 The potential trip generation associated with the Proposed Development has been calculated using data agreed with Camden Council over the course of the pre-application meetings.

- 10.24 The Proposed Development is anticipated to generate a total of 1,469 no. two-way movements by all modes over the course of a typical day, based on an assumption of full occupancy. This would comprise 119 no. two-way movements during the AM peak hour and 123 no. two-way movements during the PM peak hour.
- 10.25 A total of 26 no. two-way vehicle movements would be anticipated on a typical weekday, comprising a maximum of 2 no. two-way movements during the PM peak hour, with no movements across the AM peak hour. RGP anticipate that these vehicle movements would almost entirely comprise taxi pick-up / drop-off activity, given the excellent public transport services available in close proximity to the Site.
- 10.26 Taxi pick-up and drop-off is proposed to be accommodated within the existing taxi rank on Coram Street, less than 50m from the Brunswick Centre, which has capacity for 3 no. taxis.
- 10.27 With regards to disabled car parking, London Plan policy T6.5 states that *“all non-residential elements should provide access to at least one on or off-street disabled persons parking bay”*. Additionally, Camden Local Plan policy T2 and supporting text at paragraph 10.18 of the Local Plan states that *“parking for disabled people for both residential and non-residential developments should be provided where it can be demonstrated as necessary”*.
- 10.28 Although no hotel car parking is proposed as part of the scheme, consideration has been given to the provision of disabled parking for guests and staff. In order to ascertain the number of disabled parking spaces likely to be required as a result of the Proposed Development, the Applicant Team reviewed previous research by Whitbread which demonstrates the usage of Universally Accessible (UA) bedrooms from 10 Premier Inn hotels within central London. This has shown that over the course of a year, of the 530,028 reservations made, only 20,040 were made for an accessible room (i.e., 3.78%).
- 10.29 However, UA rooms will ultimately be booked regardless of whether a guest requires it or not, when room bookings at each hotel begin to approach full capacity closer to the date of stay Therefore, to filter this information to make it more robust, an assumption has been made that those requiring a UA room would make a reservation at least 30 days prior to



arrival at the hotel, which leaves a total of 2,809 bookings over this period (i.e., 0.5% of the total room bookings).

10.30 On this basis, when applied to the proposed 207 hotel bedrooms, there would typically be 1 guest per night requiring a UA bedroom (0.5% of the total bedrooms).

10.31 In order to confirm whether any new dedicated on-site disabled parking is necessary, the nearby on-street parking bays have been surveyed to understand existing usage and spare capacity. The surveys were conducted using the 'Lambeth' survey methodology on 23 and 24 March 2023. This survey methodology is commonly accepted across London Boroughs to identify the overnight usage of parking bays i.e., when the potential demand for parking would be greatest. The results of the parking stress survey are contained within the supporting Transport Assessment (Figure 13 and Appendix D), and identify three available disabled parking spaces overnight within approximately 200m of the Site.


10.32 The closest available disabled parking bay on each survey night was at Bernard Street, approximately 120m from the hotel entrance, with the others typically being around 200m away. The route to the hotel entrance from all disabled parking bays is of a generally level topography and entirely step free, with existing dropped kerb crossings provided on all routes.

10.33 The predicted requirements for disabled parking spaces are therefore identified to be able to be sufficiently accommodated by the nearby on-street parking bays.

10.34 As set out above, Whitbread do not accept coach parties and therefore do not need to manage them. However, the Applicant is happy to accept a suitably worded planning condition restricting the use of coaches in connection with the Proposed Development in the event that another operator were to come forward in the future.

10.35 With regards to cycle parking, based on number of bedrooms, the London Plan standards requires 11 long-stay cycle parking spaces and 5 short-stay cycle parking spaces. It is proposed to deliver 11 long-stay cycle parking spaces within a secure Back of House area.

10.36 It is also proposed to deliver 3 x Sheffield style stands externally capable of accommodating 6 no. bicycles, thereby exceeding the minimum short-stay cycle parking standards. The



location of the short-stay cycle parking is to be agreed with LB Camden in due course. An indicative area is included on the Ground Floor Plan (ref. 4742-PA1-100 Rev B) prepared by Axiom Architects and submitted in support of this application. It is anticipated that full details of the short stay cycle parking will be secured via a suitably worded planning condition.

10.37 A supporting Travel Plan, prepared by RGP, has also been submitted which comprises a package of measures tailored to the needs of the Site and aims to promote active and sustainable modes of travel. Such measures include establishing travel behaviour patterns and recognising barriers to change, and implementing a package of physical and management measures that will facilitate and actively encourage the use of sustainable modes of transport.

10.38 In summary, the Proposed Development is car-free, in addition to being located in a highly sustainable and accessible location in line with the London Plan and Camden planning policy. Furthermore, all ancillary requirements such as taxi pick-up and drop-off, as well as disabled parking, can be comfortably accommodated within the existing public highway network.

10.39 The Proposed Development will not generate a significant level of vehicular traffic and as such, would not have a significant impact on the capacity of the surrounding highway network.


10.40 The proposals will meet the London Plan standards for long-stay cycle parking and exceed the standards for short-stay cycle parking.

10.41 The Proposed Development consequently accords with relevant national, regional, and local planning policy in respect of highways matters and is therefore acceptable in principle.

Waste and Servicing


10.42 London Plan Policy S17 seeks to reduce waste and increase material reuse, recycling and reduction in waste. Developments should be designed to have separate collection of dry recyclables and food.


10.43 Policy T7 of the London Plan specifically deals with deliveries, servicing and construction.

- 
- 10.44 Policy T7 (Part G) states that development proposals should facilitate safe, clean and efficient deliveries and servicing and that provision of adequate space for servicing, storage and delivered should be made off-street, with on-street loading bays only used where this is not possible.
- 10.45 Policy T7 (Part G) continues that Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- 10.46 Policy T7 (Part H) states that developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night-time.
- 10.47 Policy T7 (Part K) requires the inclusive and safe access for people walking or cycling to be prioritised and maintained at all times during the construction phase of development.
- 10.48 Local Plan Policy T4 states that the Council will promote the sustainable movement of goods and materials.
- 10.49 Policy CC5 of the Camden Local Plan outlines that the Council will seek to make LB Camden a low waste borough, particularly by ensuring that developments include facilities for the collection of waste and recycling.

Policy Assessment

- 10.50 A Delivery, Servicing and Waste Management Plan, prepared by RGP, is submitted in support of this application.
- 10.51 All delivery and servicing activity for the hotel would be accommodated on-site within the basement level service yard, which serves the wider Brunswick Centre. Access is available from an existing ramp on Marchmont Street, on the western frontage of the Brunswick Centre, and egress is available via separate existing ramp on Hunter Street, on the eastern frontage of the Centre.

- 
- 10.52 Due to the physical constraints of the Site, a test run was undertaken on 20 February 2020 to establish the appropriate vehicle size for the Site. As a result of these investigations, it is proposed to utilise a 14t Rigid vehicle.
- 10.53 It is anticipated that approximately two vehicle movements per day, between 30 and 40 minutes, will be required to service the proposed hotel. Delivery and servicing trips are proposed to be undertaken during the daytime to ensure that the peak highways hours are avoided.
- 10.54 In addition to the above, as Whitbread are the envisaged incoming occupier, delivery and servicing is proposed to be undertaken in accordance with their adopted strategy. It is Whitbread policy for vehicles to visit a number of hotels as part of a coordinated strategy to reduce the impact of Whitbread operations on the highway network.
- 10.55 In terms of waste management, the proposed hotel will contain a dedicated bin store at hotel bedroom level, adjacent to the Back of House areas, and close to the Brunswick Centre service road which will ensure that the transfer distance from the bin store to the collection vehicle is minimised.
- 10.56 The bin store will contain the following waste / recycling streams:
- a) General waste: 1,100 litre bins;
 - b) Mixed recycling: 1,100 litre bins;
 - c) Food waste: 240 litre bins; and
 - d) Glass: 240 litre bins.
- 10.57 Hotel bedrooms will be provided with a single small waste bin only, which will be collected by cleaning staff. As is typical of hotel bedrooms, the material in the bins will not be manually segregated by hotel staff and will go directly to the general waste bins.
- 10.58 Waste and recycling material from the hotel Back of House areas and kitchen will be segregated at source and directed to the appropriate bins. No food will be provided in bedrooms (no room-service is available as part of the hub offer proposed to be carried on by Whitbread) and will be limited to the main hotel kitchen and catering areas only.



10.59 The proposed hotel will be served by 3 no. bin collections per week, with collection times between 06:30 and 18:00. No collections would take place on Sundays or Bank Holidays. As with the servicing strategy, it is proposed that the collection vehicle will visit a number of hotels as part of a coordinated strategy.

10.60 The Delivery, Servicing and Waste Management Plan therefore confirms the following:

- a) Suitable arrangements are in place for the storage of waste and recyclable materials at the site;
- b) Waste and recyclable materials would be collected from the site through a suitably managed arrangement;
- c) The operator would seek to increase reuse / recycling and limit waste sent to landfill;
and
- d) Measures are in place to ensure safe and efficient storage and collection practices would be maintained.

10.61 In summary, all delivery and servicing is proposed to take place within the Site. Storage containers will be clearly labelled, and materials will be segregated at source in the Back of House areas and kitchen. Overall, the proposals accord with the relevant national, regional, and local planning policies and are therefore acceptable in principle.

11 Amenity


- 11.1 This section assesses the potential effects of the Proposed Development in terms of amenity, predominantly in relation to noise and air quality.

Noise


- 11.2 The NPPF contains guidance on noise management in planning decisions. Paragraph 185 states that the outcome of planning decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of development and mitigate noise impacts. This paragraph contains recognition that development will 'often create some noise.'
- 11.3 London Plan Policy D14 places the responsibility for mitigating impacts from existing noise on the proposed new noise sensitive development. New noise and nuisance generating development close to noise sensitive uses should put measures in place to mitigate and manage noise impacts.
- 11.4 Local Plan Policy A4 is clear that the Council will seek to ensure that noise is controlled and managed, and that development should have regard to LB Camden's Noise and Vibration Thresholds.
- 11.5 Policy A5 of the Local Plan outlines that planning permission for noise generating development will only be granted if it can be operated without causing harm to amenity. The Council will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.


Policy Assessment

- 11.6 An Acoustic Report has been prepared by Clarke Saunders and is submitted in support of this Application.
- 11.7 The Acoustic Report contains a survey of external environmental noise levels at rooftop level, and a survey of noise and vibration levels from underground trains within the lower basement level of the Brunswick Centre.

- 
- 11.8 Clarke Saunders have utilised the results of this environmental survey data to establish new plant noise emissions criteria in accordance with LB Camden's noise standards.
- 11.9 The Acoustic Report identifies a number of attenuation measures required to ensure that the proposed rooftop plant is compliant with LB Camden's noise standards.
- 11.10 The basement noise and vibration surveys confirmed that vibration levels from underground trains are below tactile thresholds and fulfil both LB Camden's and Premier Inn's acoustics requirements.
- 11.11 Whilst the re-radiated noise levels from underground trains were found to be within LB Camden's acoustic limits, they were found to exceed the hotel operator's performance standard.
- 11.12 In response to this, the Proposed Development was updated to enable the hotel guestrooms to be constructed on an isolated concrete slab, with internal walls and ceilings isolated from the core building structure.
- 11.13 This proposed design solution will meet the hotel operator's requirements and that of London Borough of Camden.
- 11.14 Film soundtrack noise breakout from the cinema demise was inaudible during the surveys. The current design incorporates full isolation of guestrooms from the building structure and suitable buffer zones to minimise risk. Detailed design will target compliance with LB Camden and Premier Inn internal noise level requirements.
- 11.15 The Acoustic Report demonstrates that the proposed rooftop plant will fulfil LB Camden's acoustic requirements with the requisite attenuation measures and will not have an adverse impact on nearby sensitive receptors. The Proposed Development therefore accords with the relevant national, regional, and local policy and is therefore acceptable in principle.


Air Quality


- 
- 11.16 At a national level, the NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution (paragraph 174).
- 11.17 NPPF paragraph 185 advises that planning decisions should ensure that development is located appropriately. Development proposals should consider the likely effects of pollution on health, living conditions and the natural environment, as well as potential sensitivity of the Site or the wider area to effects that could arise from development. In pursuance of this, development proposals should mitigate and reduce to a minimum any potential effects upon amenity.
- 11.18 NPPF paragraph 186 states that “planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.”
- 11.19 Policy GG3 of the London Plan states that developments should seek to improve London’s air quality by, inter alia, reducing public exposure to poor air quality and ensuring that buildings are well-insulated and ventilated.
- 11.20 London Plan Policy SI1 states development proposals must be at least air quality neutral and should not:
- a) lead to further deterioration of existing poor air quality;
 - b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; and
 - c) create unacceptable risk of high levels of exposure to poor air quality.
- 11.21 At a local level, Local Plan Policy CC4 requires development to provide air quality assessments where the proposed scheme is likely to expose residents to high levels of air pollution.
- 11.22 Local Plan Policy A1 requires developments to protect the quality of life of occupiers and neighbours including in respect of odour, fumes and dust.

- 
- 11.23 LB Camden declared a borough-wide Air Quality Management Area (AQMA) in 2002 due to exceedances of the annual mean Air Quality Standard (AQS) for nitrogen dioxide (NO₂) and the 24-hour mean AQS for particulate matter (PM₁₀). As such, all developments are to limit their impact on local air quality.
- 11.24 LB Camden Planning Guidance 'Air Quality' published in 2021 states that the Council's overarching aim is for new development to be 'air quality neutral', not lead to further deterioration of existing poor air quality and, where possible, to improve local air quality ('air quality positive').
- 11.25 LBC have drafted the Camden Clean Air Strategy 2019-2034 and the Camden Clean Air Action Plan 2022-20266, which outlines the actions and strategies being undertaken to reduce pollution concentrations across the borough. These measures include the incentivising of cleaner forms of transport and reducing emissions from development and buildings.

Policy Assessment

- 11.26 An Air Quality Assessment, prepared by Phlorum, is submitted in support of this application. In accordance with LB Camden's requirements, the Camden Air Quality proforma has also been completed by Phlorum and is submitted in support of this application.
- 11.27 All existing Air Quality monitors (operated by DEFRA and Camden) within 1.0km of the application site have been included within the baseline chapter (Chapter 3).
- 11.28 The Assessment confirms that the main sources of air pollution in the vicinity of the application site are vehicles travelling on the local road network; specifically, each of the four road links that surround the Brunswick Centre. These are, namely, the B502 Bernard Street, Marchmont Street, Handel Street, and the B504 Brunswick Square.
- 11.29 Assessments were undertaken to determine the baseline air quality conditions in the vicinity of the Site through a combination of appropriately sourced background concentration estimates and local monitoring data.

- 
- 11.30 The Assessment considers that the Proposed Development is considered to be of Medium Risk for nuisance dust soiling effects, Low Risk for PM10 health effects and a Negligible Risk for ecological impacts, in the absence of mitigation.
- 11.31 Consequently, a number of mitigation measures are recommended to minimise impacts from dust and fine particles including the covering of skips, chutes and conveyors.
- 11.32 After the implementation of mitigation measures, it is considered the significance of each phase of the construction programme will be reduced and the residual significance of impact for the construction phase is expected to be Negligible.
- 11.33 From an operational perspective, due to the low volume of traffic expected to be generated by the proposals, it is not anticipated that the Proposed Development will have an adverse impact on local air quality at existing receptors surrounding the Site.
- 11.34 The Proposed Development is also anticipated to achieve Air Quality Neutral status in respect of the building and transport emissions.
- 11.35 The air intakes of the proposed hotel will utilise the existing work shafts within the Brunswick Centre, distanced approximately 35m from the closest roadside pollutant contribution (B502 Bernard Street).
- 11.36 The existing air intakes are elevated approximately 10m above street-level. As such, pollutant concentrations at these intakes are likely to be further reduced in comparison to roadside (ground-level) concentrations; the result of greater pollutant dispersion with increasing height.
- 11.37 London Atmospheric Emission Inventory, UK-AIR and local air quality monitoring data from the wider area suggest that whilst air quality within the surrounding area is poor at roadside locations, background pollution concentrations across the site, including at the location of the fresh air intake, are likely to be below the relevant UK Air Quality Standard concentrations. Therefore, the location of the Proposed Development is considered suitable for its proposed hotel use.



11.38 During pre-application discussions, LB Camden Officers confirmed that internal filtration for both NOX and PM will not be required for the Proposed Development. This is due to concentrations of both pollutants being anticipated to be below their respective Air Quality Standards as set out above, as well as the additional energy burden these strategies may potentially cause.

11.39 Overall, the Proposed Development accords with the relevant national, regional, and local planning policy in respect of air quality and is therefore acceptable in principle.

12 Technical considerations

12.1 A number of other planning matters have been taken into account when designing and assessing the proposals. Consideration of these matters follows below:

- 1) Fire
- 2) Arboriculture
- 3) Flooding
- 4) Drainage
- 5) Construction principles

Fire


12.2 Policy D5 of the London Plan states that development proposals should achieve the highest standards of accessible and inclusive design.

12.3 Policy D5 (Parts B4 and B5) state that development proposals should be entered, used and exited safely, easily and with dignity for all and that development should be designed to incorporate safe and dignified emergency evacuation for all building users.

12.4 Policy D12 of the London Plan illustrates the importance of fire safety and ensuring the safety of all building users meaning all development proposals must achieve the highest standards of fire safety. Developments should be constructed in an appropriate way to minimise the risk of fire spread, provide suitable means of evacuation and should develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in.

12.5 Policy D12 (Part B) of the London Plan states all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

12.6 Supporting Paragraph 3.12.1 of the London Plan goes on to state that the fire safety of developments should be considered from the outset. Development agreements,



development briefs and procurement processes should be explicit about incorporating and requiring the highest standards of fire safety.

- 12.7 Local Plan Policy D1 advises that the LB Camden will require that development carefully integrates building services equipment, including fire escapes.

Policy Assessment

- 12.8 In line with Policy D12 (Part B) of the London Plan, a Fire Statement (including Evacuation Strategy) has been prepared by Orion Fire and is submitted in support of this application.

- 12.9 The Fire Statement assesses the proposed fire safety systems, the building fabric, and components, means of escape, space separation and fire service access.

- 12.10 The fire safety provisions and the ways in which they satisfy the London Plan requirements and relevant legislation are set out in the Fire Statement prepared by Orion Fire and are considered to accord with the relevant regional and local planning policies.


Arboriculture

- 12.11 Policy G7 of the London Plan states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed.

- 12.12 Part C of Policy G7 advises that the planting of additional trees should generally be included in new development – particularly large canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

- 12.13 Policy A3 of the Camden Local Plan is clear that the Council will protect, and seek to secure additional, trees and vegetation.

- 12.14 Policy A3 further requires trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development in line with



BS5837:2012 'Tree in relation to Design, Demolition and Construction' and positively integrated as part of the site layout.

Policy Assessment

12.15 A supporting Arboricultural Method Statement, prepared by James Blake Associates, is submitted in support of this application.


12.16 The Arboricultural Method Statement confirms that there are 4 no. existing trees on site (T1 – London Plan, T2 – London Plane, T3 – Norway Maple and T4 – Sycamore), all of which are proposed to be retained as part of the proposals.

12.17 The Statement confirms that no tree works are required to facilitate development or are recommended on the basis of good arboricultural practice. Furthermore, there will be no construction activity in the vicinity of the young trees T1 and T2 or passing close to off-site trees T3 and T4. Consequently, no additional tree protection measures are required for these trees as a result of the Proposed Development. Therefore, the proposal accords with the relevant regional and local planning policies.

Flooding


12.18 The NPPF identifies that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.

12.19 Local Plans should also be supported by Strategic Flood Risk Assessments and develop policies to manage flood risk from all sources. Sequential tests should be used to steer development to areas with the lowest probability of flooding. Strategic Flood Risk Assessments would provide the basis for applying this test. If, following the application of the sequential test, it is not possible or consistent with wider sustainability objectives for development to be located in areas with a lower probability of flooding, the exception test should be applied if appropriate.

- 
- 12.20 Chapter 14 of the National Planning Policy Framework recommends that SuDS should be utilised, where possible, within all new drainage schemes.
- 12.21 Policy GG6 of the London Plan seeks to help London become a more efficient and resilient by ensuring that buildings are designed to reduce impacts from natural hazards like flooding.
- 12.22 London Plan Policy SI 12 states that development proposals should ensure that flood risk is minimised, mitigated and the residual risks are addressed.
- 12.23 London Plan Policy SI 13 states that developments should utilise SuDS unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates, ensuring that surface water runoff is managed as close to its source in line within the GLA identified drainage hierarchy.
- 12.24 Policy CC3 of the Camden Local Plan states that the Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible, inter alia, through the use of SuDS where feasible.
- 12.25 Supporting Paragraph 8.55 of the Local Plan states that major developments and high or intense water use developments, such as hotels, hostels and student housing, should include a grey water and rainwater harvesting system.
- 12.26 LB Camden Planning Guidance 'Water and Flooding' (March 2019) also gives further guidance in respect of the water environment in LB Camden, water efficiency and flooding.


Policy Assessment

- 12.27 A supporting Flood Risk Assessment, prepared by Heyne Tillett Steel (HTS), is submitted in support of this application.
- 12.28 The Flood Risk Assessment identifies that the Site is located within Flood Zone 1 with low flood risk from all uses. Nevertheless, due to the change of use at basement level and the Site's location within a Critical Drainage Area, a Flood Risk Assessment has been undertaken.

- 
- 12.29 The National Planning Policy Framework identifies hotels as a ‘more vulnerable’ land use in flooding terms. However, in accordance with the NPPF table of Flood Risk Vulnerability and Flood Zone Compatibility, it is appropriate to locate new hotels within Flood Zone 1.
- 12.30 HTS identify the flood risk from rivers and the sea, the flood risk from sewers and the flood risk from artificial sources such as reservoirs to be low.
- 12.31 The Flood Risk Assessment identifies a small part of the central area of the Site to be at low to medium risk of flooding from surface water. However, as the Proposed Development is located within the basement levels of the building, and given the remaining building footprint is at low risk of flooding from surface water, HTS consider the risk of surface water flooding to be low.
- 12.32 The Flood Risk Assessment identifies that the Site is partially located within an area of Increased Susceptibility to Elevated Groundwater. Having reviewed historic groundwater flood incidents, neither the Site, nor areas around the Site, have any record of groundwater flooding. HTS consequently consider the risk of flooding from groundwater to be low.

Drainage

- 12.33 The scheme proposes to retain the existing drainage strategy with the only amendments to the drainage limited to the area of intervention with foul water drainage provision to serve the new hotel rooms and F&B area at lower ground floor.
- 12.34 New pumping stations are to be formed below the existing slab, with storage included in the void space below the slab. The pumping stations require localised breaking out of the basement slabs to install but the majority of the slabs will be unaffected.
- 12.35 In accordance with Camden Local Plan policy and the London Plan, the design and feasibility of SuDS was explored. A SuDS drainage hierarchy assessment has been carried out and is presented within Section 5 of the supporting Flood Risk Assessment.
- 12.36 Due to the fact that minimal works are proposed above ground level, it is considered that it would be inappropriate to incorporate rainwater harvesting into the proposals i.e., redirect



rainwater to an attenuation tank in the basement prior to pumping it back to the high-level network. Consequently, it is instead proposed to maintain the existing rainwater gravity network. Due to the lack of proposed soft landscaping, other forms of SuDS have also been considered as not feasible.

12.37 Furthermore, consideration has been given to the potential to install a green roof to the Brunswick Centre throughout the pre-application stages.

12.38 Initial investigations suggested that the installation of a green roof would result in the PV panels protruding about the parapet line, thereby being visible from the wider street scene.

12.39 This rationale was accepted by Officers at the final pre-application meeting who requested confirmation that this would be the case.

12.40 Since this time, further investigations have been undertaken and at this stage it is considered that the loading requirements for a green roof would have an adverse impact on the structural integrity of the listed building, and as such, is not included within the scope of the Proposed Development


12.41 However, greywater harvesting is proposed to be incorporated into the scheme which will provide sufficient daily water for flushing toilets in all hotel rooms.

12.42 As set out above, in light of the fact that the proposals are limited to the basement and the existing high-level drainage is proposed to be retained, HTS conclude that the introduction of SUDs into the basement is not appropriate.

12.43 A pre-application enquiry was submitted to Thames Water who have confirmed that the existing combined sewers on Marchmont Street and Hunter Street have capacity to support the Proposed Development.

12.44 Overall, the proposed development is therefore considered to accord with the relevant national, regional, and local planning policies.

Construction Principles

- 
- 12.45 A supporting draft Construction Management Plan (CMP), prepared by Gilbert Ash, has been submitted as part of this application. The DRAFT CMP identifies and outlines measures to minimise construction impacts.
- 12.46 The supporting draft CMP has been developed to identify and outline measures to minimise construction impacts, in line with the Council's proforma. The draft CMP provides a range of measures including, and in response to residents' concerns, the use of a Traffic Light System in respect of construction noise, whereby the average noise levels are assessed. If a peak of disturbance remains for a prolonged period of time, an amber light will come on and the Team will down tools to ensure the average of construction noise remains within the requisite limits. Details of this system were shared with residents at the second round of consultation and with LB Camden during the final pre-application meeting.
- 12.47 In addition, the Project Management Team will set up a construction working group and hold consultation meetings with local businesses and residents in advance of works commencing on site.
- 12.48 Further detail is set out in the draft CMP, prepared by Gilbert-Ash, and submitted in support of this application for Full Planning Permission and Listed Building Consent.
- 12.49 A full CMP will be prepared in consultation with neighbours and submitted for approval from LB Camden prior to the commencement of works.
- 12.50 The Site is located within the Cumulative Impact Area (CIA). All development sites located within the Cumulative Impact Area which are required to submit a CMP are required to complete the CIA checklist. As such, the requisite checklist has been completed and is submitted in support of this Application.

13 Planning Obligations and CIL

- 13.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of land.
- 13.2 In accordance with Regulation 122 of the CIL Regulations, and paragraph 57 of the NPPF, planning obligations must only be sought where they meet all of the following tests:
- Necessary to make the Proposed Development acceptable in planning terms;
 - Directly related to the Proposed Development; and
 - Fairly and reasonably related in scale and kind to the Proposed Development.
- 13.3 Paragraph 55 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 13.4 Under Paragraph 56 of the NPPF, planning obligations should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise, and reasonable in all other respects. It goes on to state that agreeing conditions is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided unless there is clear justification.
- 13.5 Supporting Paragraph 4.26 of the Camden Local Plan states that the Council will seek Section 106 planning obligations, where it is legitimate to do so, to ensure that the additional demand a development places on existing community infrastructure and services is met.
- 13.6 Supporting Paragraph 4.27 of the Camden Local Plan continues that the Council will take viability into account as a factor in determining the types of facilities or services that are required under Section 106 agreements and the timeframe in which these can be delivered.

13.7 LB Camden published its Developer Contributions Planning Guidance in March 2019, which replaced the CPG 8 Planning Obligation (July 2015 – updated March 2018), which has been consulted as part of the proposals.

Draft Heads of Terms

13.8 The Applicant will enter into a legal agreement with the London Borough of Camden to secure the reasonable and necessary planning obligations associated with the development in accordance with Regulation 122 of the CIL Regulations and relevant planning policies.

13.9 Based on the scope of the Proposed Development, it is envisaged that the following obligations would be agreed as part of the Section 106 agreement:

- Agreement and implementation of a defined Heritage Condition Repair Package;
- Agreement and implementation of an Employment and Training Strategy;
- Employment and training contribution;
- Construction Management Plan (CMP);
- CMP monitoring fee;
- Travel Plan;
- Travel Plan monitoring fee;
- Public realm improvements contribution;
- Delivery and Servicing Management Plan;
- Carbon offset contribution; and
- Residents' cycle parking provision.

13.10 Greengage have calculated the anticipated carbon offset contribution which is set out within the Energy Statement submitted in support of this application for Full Planning Permission and Listed Building Consent.

13.11 Based on the £95 / tonne figure set out in the London Plan, the anticipated carbon reduction payment is **£110,301**.

13.12 Furthermore, the Applicant has agreed to pay a contribution of £20,000 in respect of a Public Realm Improvements contribution to improve the existing northbound cycle contraflow on Marchmont Street between Bernard Street and Coram Street.

Community Infrastructure Levy

13.13 On 6 April 2010, the Community Infrastructure Levy Regulations 2010 (as amended) came into force to fund the provision, improvement, replacement, or maintenance of infrastructure required to support development, as set out within each Local Authority's annual infrastructure funding statement (a 'living' document which provides a summary of the infrastructure which CIL receipts should fund).

13.14 Most new development which creates net additional floor space of 100 square metres or more, or creates a new dwelling, is potentially CIL liable. This is confirmed by Paragraph 3.2 of the Camden Developer Contributions CPG.


13.15 A change of use that requires planning permission is deemed development for the purposes of CIL. However, if there is no 'new build' or no net increase in the GIA of the existing building, then the charge would be zero.

13.16 The proposed change of use of part of the lower ground floor car park and one retail unit at the Brunswick Centre to hotel use would be deemed development for the purposes of CIL.

13.17 However, no new floorspace is created and the existing building has also been in lawful use for a continuous 6-month period in the last three years. Accordingly, no CIL liability is calculated to arise in connection with the Proposed Development.

14 Conclusion

- 14.1 The Proposed Development will deliver a high quality, innovative, and sustainable change of use of an underutilised car park to deliver a smart hotel at lower ground floor of the Brunswick Centre.
- 14.2 The applications follow extensive pre-application consultation with the planning, design, highways, and sustainability officers at Camden Council. Pre-application discussions have also taken place with other local stakeholders, including the 20th Century Society and Designing Out Crime Officer, as well as extensive consultation with the local community. During this process, the team has positively responded in terms of design and perceived impacts on neighbouring uses.
- 14.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 14.4 This Planning Statement has assessed the proposals against the development plan and other relevant planning policy and guidance at national, regional, and local policy levels.
- 14.5 It concludes that the Proposed Development meets the aspirations of the statutory development plan, which actively supports visitor accommodation in this location. The public benefits of the Proposed Development are also material considerations of notable weight in favour of the proposals.
- 14.6 Section 38(6) of the 2004 Act therefore requires that Full Planning Permission be granted.
- 14.7 Due to the Site's statutory listing, and location within the Bloomsbury Conservation Area, consideration has also been given to the statutory tests contained in the Planning (Listed Buildings and Conservation Areas) Act 1990, specifically Sections 16, 66 and 72. As set out in the supporting Heritage, Listed Building and Townscape Assessment, prepared by Purcell, it is concluded that the Proposed Development would cause less than substantial harm at the lesser end of that category to the listed building and Conservation Area. In accordance with NPPF Paragraph 202, this less than substantial harm has been weighed against the public



benefits of the proposal. Overall, the public benefits are considered to outweigh this less than substantial harm.

- 14.8 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.
- 14.9 The Proposed Development meets the aspirations of development plan policy, in addition to satisfying the relevant statutory tests. The Proposed Development will promote an appropriate use which will complement the existing function of the Centre.
- 14.10 The application for Full Planning Permission and Listed Building Consent should therefore be granted consent accordingly.

OFFICES

London (West End)
One Fitzroy
6 Mortimer Street
London, W1T 3JJ
Tel. +44 (0)20 7493
3338

London (City)
Bow Bells House
1 Bread Street
London EC4M 9BE
Tel. +44 (0)20 7489
8900

Birmingham
45 Church Street
Birmingham B3 2RT
Tel. +44 (0)121 616
4800

Cardiff
32 Windsor Place
Cardiff CF10 3BZ
Tel. +44 (0)29 2038
8044

Leeds
1 York Place
Leeds LS1 2DR
Tel. +44 (0)113 204 8419

Manchester
No1 Marsden Street
Manchester M2 1HW
Tel. +44 (0)161 259 0450

Milton Keynes
Avebury House
201-249 Avebury
Boulevard
Milton Keynes MK9 1AU
Tel. +44 (0)1908 685950

West Malling
35 Kings Hill Avenue
West Malling
Kent ME19 4DN
Tel. +44 (0)1732 229420