167/02

21 October 2023

Charlotte Meynell Planning Solutions Team London Borough of Camden 133 Foundling Court The Brunswick Centre Marchmont Street London WC1N 1QF

Dear Ms Meynell

The Brunswick Centre, Proposed Hotel Planning Application reference No 2023/3870/P and 2023/3971/L

I note below my comments on the proposals in the application noted above.

I have lived at The Brunswick since 1999 and from 2001 to 2011 I was Chair of the Tenants and Residents Association. Since 2014 my office has been based in one of the commercial units at the Brunswick Centre.

The proposal is for the introduction of a hotel within the basement of the Brunswick Centre with a reception at ground level on the Marchmont Street elevation. New building services and a plantroom enclosure are proposed at roof level to both Foundling Court and O'Donnell Court.

The basement currently has a public car park at level -1 and a private car park and limited bicycle racks for Camden residents at level -2. In the area of the proposed development the slab at level -1 will be cut and lowered to increase the headroom for the hotel bedrooms and common parts. The space below the lowered slab will no longer be accessible. At the north end of the basement a new ramp will be built to provide access for car parking on both levels. A small area of car parking for residents on both levels will be retained at the south end of the building.

The structural report by Heyne Tillett Steel shows the majority of the existing reinforced concrete slab at level -1 will be removed. They propose to strengthen some of the retained reinforced concrete columns to address the possible buckling that may result from an increase in the height of the columns. There is no mention of any assessment of the structural implications arising from the removal of the diaphragm action currently provided by the slab at level -1, and the detachment of the shear walls from the slab at this level. Any implications for the overall stability of the building is a fundamentally important structural issue. A clear response is needed to justify the proposed structural changes and confirm that there will be no structural issues for the overall structure is required. Without this the application should be rejected.

The potential disturbance from noise and vibration during the work is significant. Sound travels through the concrete structure and is very intrusive for people at home or working in the building. As an example, recent drilling in one of the shop units has meant we have had to abandon several web-based meetings. A trial of the proposed methodology should be carried out with representatives of the Brunswick Tenants and Residents Association in attendance so that any additional measures to mitigate noise, dust and vibration can be put in place. Working hours for the removal of concrete should be limited to reduce the disturbance to residents, which is likely to be considerable. I would like there to be no work on weekends that will cause noise or vibration disturbance.

I am very concerned about the proposed enclosure on both roofs for new plant. The roofscape of the Brunswick Centre is a key feature of this Grade II listed building. The proposed plant enclosure can be seen below on the marked-up photo taken from my 5th floor flat. The outline in red of the proposed enclosure is indicative, based on plans and elevations in the application. This proposal causes serious harm to the listed building and should be rejected.



Approximate outline in red of proposed plant enclosure on O'Donnell Court

At roof level the proposal is to install solar panels on the flat roofs above the 7th floor to O'Donnell and Foundling Court. This was something I first suggested more than 15 years ago when I was Chair of the Brunswick Tenants and Residents Association and I support the principle of this proposal.

There is, however, a bigger picture to address when considering the solar panels proposed in this application. The Brunswick Centre has significant issues when dealing with the need to reduce the amount of non-renewable energy to provide heating and hot water. Flats and the commercial units have large areas of single-glazed windows and cold-bridging through uninsulated reinforced concrete walls and slabs. They get cold in the winter and overheat on very hot days in the summer.

It is likely to remain prohibitively expensive to replace the existing glazing to the flats in a way that would be acceptable for a listed building. Addressing the problems of cold-bridging by adding insulation would cause major disruption to those living in the building. It would also significantly alter the appearance of the building in a way that would also be unacceptable for a listed building. The answer, therefore, is to change from the existing gas boilers to a renewable energy supply, such as solar panels.

During a meeting with the freeholder's project team on 12 July 2023 I was very concerned to hear that all of the energy generated by the solar panels will be directed solely to the proposed new hotel. If agreed, this proposal will mean that the options for making the existing building carbon-neutral at some time in the future will be severely limited. My view is that any proposal for renewable energy should be directed to the existing building and not to further development.

I have not had time to look at every document in the application, but those I have read make no mention of the need for repairs to the reinforced concrete structure. This was last repaired as part of the refurbishment works during 2004-5. The repairs were carried out by a Design and Build contractor and were poorly detailed. Many of the repairs have now failed. Any proposed works to the building should be conditional on the freeholder fulfilling their obligation to care for the listed building with regular maintenance and repairs.

For these reasons I recommend that the application be rejected.

Yours sincerely

Stuart Tappin