
From: Charlotte Meynell
Sent: 13 November 2023 08:15
To: Planning Planning
Subject: FW: The Brunswick Centre, Proposed Hotel Planning Application reference No 2023/3870/P and 2023/3971/L



Thanks,

Charlotte Meynell
Senior Planning Officer

Telephone: 020 7974 2598



From: rosamond perrott [redacted]
Sent: 10 November 2023 13:09
To: Charlotte Meynell <Charlotte.Meynell@camden.gov.uk>
Subject: The Brunswick Centre, Proposed Hotel Planning Application reference No 2023/3870/P and 2023/3971/L

Dear Charlotte Meynell,

The Brunswick TRA have studied the proposal to remove part of the upper floor car park, lower the slabs and construct an underground hotel. in the Brunswick. Centre. There are a number of concerns/questions which have been raised by residents, as detailed below.

HERITAGE

The Brunswick Centre is a Grade II listed building and located in the Bloomsbury Conservation Area (both designated heritage assets), and as such the local planning authority has a duty under Sections 16(2) 66(1) and 66(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990. In respect of granting listed building consent or planning permission, the Council must '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' and must pay 'special attention... to the desirability of preserving or enhancing the character or appearance of that [conservation] area'.

The shape, massing, scale, skyline profile and appearance of the Centre form part of its architectural design and are key components of its special architectural or historic interest as a listed building. The striking and iconic service towers are a central feature of the Centre's design.

The Centre is not a traditional urban block with an exterior facing surrounding streets and an inaccessible interior. It has an important pedestrianised street running through it, a highly populated place from which the sloping internal street walls and roof of the Centre can be clearly seen. This is also part of the special interest of the Centre.

A key component of the design of the Centre is the glazed balcony or winter garden feature, that provides to residents' views from each level of the building outwards across the conservation area but, importantly, also inwards across and above the internal street. This is not (only) an amenity matter; it is related to the design of the Centre as a listed building.

Finally, it should be noted that the Brunswick Centre was listed in 2000 **as it was finally built and notwithstanding variations from the design intentions of the original architect.**

Roof Views

Proposals for the roof level, unless confined to just horizontally laid PV panels, fully hidden behind the roof parapet, will undoubtedly harm the heritage significance summarised above. The important skyline profile of the Centre will be altered in a way that is at odds with the design of the listed building.

The report states that views have been provided of the building on every side. However, they are all from outside the Centre. As noted above, the roofscape was an inherent part of the original design, to be seen internally to offer a view of the basic idea of living in the centre. Visibility beyond that originally intended could be viewed as 'heritage' harm.

No evidence is therefore provided by the applicant that these units will not be clearly visible from the internal street/ plaza, podium and flats. The Heritage report states that other smaller detrimental impacts have been caused by aerials and gantry ladders to the roof, but the creation of further harm is not justified by existing harm.

The building was designed relatively with narrow roofs. It has already been said that if PV panels were to generate enough power to give any to the residential areas of the buildings, they would be required to be visible above the parapet. Can it be guaranteed that the PV panels at the new lower angle will generate enough power for the hotel and will not inevitably need to be raised and thus become visible above the parapet?

We understand ASHPs are to be located by the existing towers. They will be visible above the parapet, and therefore will also interfere with the roof line of the listed building.

The visibility of new features such as PVs and ASHPs will harm the special interest of the listed building and its significance as a designated heritage asset. While not substantial harm, such interventions would represent a high level of less than substantial harm, given the important contribution made by the roof line of the Centre to its special architectural or historic interest.

Questions have also been asked as to noise/vibration of ASHPs, especially for flats on 7th and 6th floors. The concrete structure of the building is very susceptible to transmitting of such.

Sustainable Energy

In addition, many residents are very troubled by the fact that there is to be a sustainable energy supply put on the Brunswick roofs solely for the use of a new separate (as yet non-existent) commercial entity below ground rather than for the residential and business areas.

UNDERGROUND WORKS

Heritage implications

The proposed 'lowering' of the intermediate car park slab effectively involves the partial demolition of a listed building. It also alters the original design of the building – its section will be changed from that originally designed. This, indisputably, represents a high level of less than substantial harm to the special architectural or historic interest and heritage significance of the listed building.

Structural Problems

It has been asked how can it be guaranteed that removing two-thirds of the upper floor will not seriously harm the structure of the building? Should the cutting out of the large slabs with a concrete-cutter prove not feasible, is there a Plan B? If so, what is it?

Noise

There has been much concern raised about the very high levels of noise, vibration (and dust) during works scheduled to last 80 weeks, particularly during the first 6 months of demolition/cutting out.

Can it be guaranteed that acoustic screens as described will ensure not just structure borne, but also airborne and ground borne, noise will not exceed decibels levels as mentioned in proposal?

Noise monitors were promised at consultations for individual flats on higher levels, but are also especially needed for ground/1st/2nd/3rd floors. There is much concern about elderly/sheltered tenants particularly on these floors unable to get out during the day, as also people who work from home, with specialist computer/recording equipment.

Would it be possible for there to be a trial where the noise is monitored and amendments made to the process if required?

Hours of working

Planning application says 8.00 am-6.00 pm, M-F, 8.00 am -1.00 pm Saturday if agreed by LBC. In consultations, it was said noisy work would be two hours on, two hours off, but did not say if this would be no noisy works at all during the two hours off or if they were merely to be moved from north to south ends (and vice versa) of building. Though marginally less audible, noise/vibration will still be heard throughout the buildings.

It is unanimously felt that there should be no noisy works on Saturdays. The noise/ vibration/ whining will be extreme especially given the nature of the building and sound transmission through concrete, and the fact that the shape of the building itself acts as sound 'enhancer'. Concrete-cutters may have less vibration but have more high frequency noise - which travels very well. The base of concrete columns will require more vibratory demolition method.

CAR PARK

New Ramp

The construction of a new ramp at the Waitrose end on upper floor wasn't mentioned in presentations/consultations. Where exactly is this? What is likely impact on current ingress/egress for residents during excavating and building and afterwards? Concerns have also been raised about the size of parking spaces, especially those on the diagonal. We assume there will be provision for electric charging points?

AIR POLLUTION

Bloomsbury is among the dirtiest boroughs in London in terms of air pollution. It is currently in 98th national percentile and exceeds three WHO limits. Undoubtedly, the demolition works and extra traffic will further increase the already bad levels of air pollution. Will there be air pollution monitors? What actions will be taken after exceedances over the WHO recommended levels? And how will the exceedances and actions be communicated to residents?

Ventilation to hotel accommodation: how is the air to be purified/filtered? Where are the proposed intakes and extracts, especially for cooking?

ROAD WORKS

New connections to Thames Water - says "may require some road and pavement trenching and connections to the boundary of the site". Digging up roads nearby? Where, which exactly?

FIRE

Concern has been a raised about proposed 'living wall' in the Circadian light well – consisting of plastic flowers. Should there be a fire (however unlikely) plastic will emit extremely toxic fumes.

RODENTS

Point 39 of pro-forma CMP states: "Gilbert-Ash will carry out an initial visual survey of the site to determine the presence of rodents." Please note rodents (rats and mice) are already in situ. Disturbance from the proposed works could cause migration to the upper levels, including the plaza as well as residential areas where considerable rodent problems have taken years to get under some sort of control. Measures need to be in place to prevent this.

SUMMARY AND CONCLUSION

The proposed development will clearly cause harm to the special architectural or historic interest and heritage significance of the listed building. Such harm must be given great weight in the consideration of the proposed development and, as required by the National Planning Policy Framework, be weighed against the public benefits of the proposal. There are also many questions which we feel need further explanation.

We are not convinced that the proposed development, a private commercial enterprise, will offer sufficient or genuinely public benefits to outweigh the less than substantial harm that is indisputably caused by the proposals.

Roz Perrott
Chair
Brunswick TRA