

Attn. Charlotte Meynell Planning Department Camden Council

15 November 2023

BRUNSWICK CENTRE ESTATE, BRUNSWICK CENTRE, LONDON WC1N 1AE Application No. 2023/3870/P

The Bloomsbury Residents Action Group (BRAG) was founded in 2016 to remind decision-makers that "Residents Matter". We object to the application to create an Underground Hotel at the Brunswick Centre, supporting the many residents of flats within the Grade II listed building who raise significant concerns about the proposal.

Located in a dense residential area south of the Euston Road, the Brunswick Centre was built in 1972 with 560 flats though the number has apparently been reduced to 400 (presumably following the centre's major renovation twenty years ago). There are 100 flats providing sheltered accommodation to many vulnerable people living within the building.

Existing residents are already familiar with noise and disturbance from commercial operations within the footprint of the building. That is the nature of mixed use. As this is a concrete structure, the inevitable high levels of noise and vibration from construction work in the basement will impact massively on the health and wellbeing of those who live and work in the immediate vicinity. Impact on residential amenity is a Camden Planning policy consideration.

Impact on heritage is another consideration. The Brunswick is Grade II listed and lies within the Bloomsbury Conservation Area. Any changes to the roofline - for solar panels or the enclosure of plant - will cause harm to the building's heritage status. Sustainability measures are to be welcomed, but not if they cause harm to this iconic building.

Serious concerns have been raised about the viability of making changes to the concrete structure below ground. Knocking through concrete slabs to create additional height for hotel rooms sounds suspiciously innocuous, but how will that impact on the overall stability of the structure? The basement levels were designed for car parking, not to be re-designed for hotel accommodation.

There will be inherent problems of how to manage construction traffic (as well as increased deliveries later) in the narrow streets of the immediate locale. Additional work to utility provision for the hotel will add to the disruption during the construction period.

Space is valuable, especially at this location in central London, and it is not surprising that the Brunswick's owners wish to maximise the value of their holdings by partnering with a hotel group.

But surely the commercial viability of the Centre itself will be in jeopardy. There has been an obvious increase in footfall since the Covid period but will people (local residents and visitors) really want to continue to shop, dine and watch films in a place which is dominated during the day by construction noise. If they go elsewhere – will they return?

What about the mental wellbeing of staff who work in the Brunswick Centre? A customer can perhaps endure the noise, shop, pay and leave. But there are many people employed in the shops, the Curzon cinema and Medical Centre (for example) – how will their stress levels cope with the relentless sound of construction, even if there are restrictions to noisy work (eg two hours on / two hours off) in due course.

To create an underground hotel out of a basement car park may seem an ingenious new use for the space - but have the Brunswick's owners and management team really weighed up the pros and cons of this intervention - or did it just seem a profitable solution to an underused space in a popular tourist area near to St Pancras International station?

The underground car park was originally built for residents to park their cars. There may be fewer car owners in 2023, but it is still a necessary amenity for those who do. The unused space could perhaps be turned into a hub for electric car use, attracting visitors from elsewhere to park, charge their e-cars and use the many facilities in the Brunswick.

Have alternative (maybe more imaginative) solutions been considered for the underground space? Where pillars and a low ceiling are no impediment for other uses. Think of the David Hockney show in the newly created underground Light Room in Kings Cross. What about the Brunswick capitalising on its existing creative ventures (gallery and cinema) to provide a new venue for immersive exhibitions?

It is worth reminding oneself of the original aspirations for the Brunswick Centre - "a heroic prototype for a holistic community, integrating housing, shopping, a medical centre, cinema and office space in a single development." The 21st century refurbishment was intended to bring the Brunswick back to "its original, modernist best, all the while working round the daily lives of its residents." (Taken from Levitt Bernstein's website). Note the reference to "community" and "residents".

There is no actual public benefit from the creation of another hotel in the immediate area to weigh against harm to heritage and residential amenity.

The construction of a hotel in the bowels of the Brunswick Centre will impact on the health and well-being of this "holistic community", so we urge Camden to refuse the application and encourage the owners to consider options and possibilities for less harmful re-use of any under-used underground space.

Debbie Radcliffe and Marianne Jacobs-Lim (co-chairs) **Bloomsbury Residents Action Group** (BRAG)