



GERALDEVE
A NEWMARK COMPANY

One Fitzroy 6 Mortimer Street
London W1T 3JJ
Tel. +44 (0)20 7493 3338
geraldve.com

Planning and Borough Development
London Borough of Camden
5 Pancras Square
London
N1C 4AG

FAO: Brendan Versluys

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Brunswick Centre, London, WC1N 1AE
Application for Full Planning Permission and Listed Building Consent
Response Letter to Consultation Comments

We write on behalf of, *Lazari Properties 2 Limited* ('the Applicant') to respond to consultation comments received in respect of the pending applications for Full Planning Permission and Listed Building Consent (2023/3870/P and 2023/3901/L) at the Brunswick Centre ('the Site').

Background

The Brunswick Centre is a Grade II listed building in mixed use located within the Bloomsbury Conservation Area. The Centre comprises an eight-storey building with residential units located above a public mixed use retail centre and central outdoor plaza. The Site also comprises two basement levels which are currently used for residential and commercial car parking, and plant/drainage associated with the above ground uses.

As part of their continued stewardship of the Brunswick Centre, the Applicant regularly monitor the occupation and vacancy levels of the Site. Through this continued monitoring, it has been identified that the subterranean car park at the Brunswick Centre is becoming increasingly underutilised, in part, due to a general societal shift towards more sustainable forms of transportation such as walking and cycling.

In order to ensure the continued success of the Brunswick Centre, 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 and provide increased footfall to support the existing uses at the Site.

Pending Applications

An application for Full Planning Permission (ref. 2023/3870/P) was validated on 25 September 2023 for the following works:

“Change of use of part of basement car park and one ground floor retail unit to hotel with ancillary food and beverage use, including alterations to upper basement floor slab, installation of plant, acoustic enclosures and PV panels at roof level, and associated works.”

A concurrent application for Listed Building Consent (ref. 2023/3901/L) was validated on 25 September 2023 for the following works:

“Internal and external alterations, including alterations to upper basement floor slab, strengthening of basement structural columns, installation of walls, fit-out and mechanical services at basement and ground floor levels, installation of plant and acoustic enclosures at basement and roof levels, installation of PV panels at roof level, and associated works in association with the change of use of part of the basement car park and one ground floor retail unit to a hotel.”

The 21-day statutory consultation period for the application conducted by Camden Council ran from 25 September 2023 until 16 October 2023. Due to consultation responses stating that residents were not notified of the application’s submission, the Applicant requested Officers to review the number of neighbour notification notices erected around the Site and additional notices were erected, where required. The consultation period was consequently extended until 14 December 2023 to enable all interested parties an opportunity to provide a consultation response.

For the avoidance of doubt, this response seeks to address the key issues raised from neighbour responses and amenity groups that have been received up to the date of this letter.

Consultation Responses

This letter seeks to address the relevant material considerations raised by residents during the consultation period.

Matters raised that are not a material consideration to the applications are not referred to within this letter. However, such responses have been noted and the applicant will liaise with relevant parties on such matters as required.

The comments received have been grouped into key topic areas as follows:

- **Amenity:** Impacts on residential amenity from construction, proposed plant equipment and future hotel guests;
- **Structure and Heritage:** Impacts on the Grade II listed building;
- **Transport:** Loss of residents’ car parking spaces, provision of disabled car parking spaces and strain on local transport infrastructure;
- **Land Use:** Demonstration of demand for a hotel in the area and impact on existing retail offer at the Brunswick Centre;
- **Design:** Use of Circadian lighting, sustainability measures and security of residents; and
- **Consultation:** neighbour notification process.

Impact on residential amenity

Construction

Queries were raised by a number of residents in respect of the impact the construction process may have on residential amenity.

A DRAFT Construction Management Plan has been prepared by Gilbert Ash and was submitted in support of this application. The Construction Management Plan sets out the arrangements that are proposed to be

implemented to manage the project-specific Safety, Health, Environmental and Quality Issues arising from the Proposed Development.

The DRAFT Construction Management Plan has been developed to identify and outline measures to minimise construction impacts, in line with the Council's proforma. The Plan 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.

The Applicant is committed to an interactive approach to managing construction impacts on the surrounding area. It is understood that a full Construction Management Plan will be secured via condition, which will require full details of mitigation measures to be submitted to and approved by the Local Planning Authority prior to the commencement of works. The full Plan will be prepared in consultation with neighbours and will take into account the feedback provided by local residents throughout the consultation period to ensure measures are put in place to minimise the impact on residents through controls for noise and dust, in addition to the safe and efficient use of roads for construction traffic.

Trial works will be undertaken prior to the slab lowering to inform mitigation measures which will be fed into the updated Construction Management Plan. Information from the trial works will be shared with residents. 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.

Proposed plant equipment

In line with Camden's planning guidelines, new plant noise is proposed to be lower than the existing background sound levels at the nearest sensitive (residential) receptors. Mitigation measures will be installed to assist with reducing noise levels, and this will include a combination of silencing and acoustic screens/louvres, which have been designed to match the existing louvres at the Brunswick Centre for consistency. Roof plant will be mounted on isolated bases, to control vibration and noise transfer through the roof. It is therefore considered that sufficient measures have been proposed to mitigate noise levels and also meet the requirements of Camden planning policy.

The proposals have been reviewed by Camden's Environmental Health Officers who have confirmed that as the proposed plant will be located on the rooftop above existing residential dwellings, spatial allowance has been incorporated into the design to site the plant items on a fully isolated plant deck. This will serve to minimise the risk of structural noise transmission.

Future hotel guests and concerns around disruption from entering/leaving hotel, and access to residential areas.

The hotel will only be publicly accessible between the hours of 7am and 11pm, after which time 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. The location of the proposed entrance is adjacent to an existing thoroughfare for the Centre and therefore any hotel guests will follow similar routes to existing visitors to the Site.

Furthermore, hotel guests will not have access to residential accommodation, which will remain secure as per the existing situation. This includes the existing residential lifts to which proposed hotel guests will not have access. Hotel guests will only have access to the proposed lifts in the lobby of the hotel which will only provide access to the ground and lower ground level of the hotel.

Impact on the Grade II listed structure

Structural impacts of the proposals

The project structural engineer, HTS, have reviewed a comment made in the consultation in relation to concerns of the structural implications arising from the removal of the diaphragm action currently provided by the slab at Level -01 and the detachment of the shear walls from the slab at this level. HTS confirm that the lowering of the existing basement B1 slab will not affect the overall stability of the building as the ground floor slab, which props the perimeter basement walls, is not affected by the works (except for a localised stair and lift opening).

The perimeter basement walls of the Brunswick Centre are propped by the Level B2 slab and the ground floor RC slab only, and the stability of the building is achieved through the reinforced concrete walls extending from basement Level B2 to roof level. The Level B2 slab, ground floor slab and stability walls of the building are not being demolished as part of the proposed structural works to form the Hotel, except for a new localised stair and lift opening through ground floor slab. There will therefore be no effect on the overall stability of the building.

The existing basement columns are currently 2 storeys tall, each of approximately equal length. Lowering the Level B1 slab will essentially make the basement columns 1 storey tall but of a greater length. The proposed structural investigations will look into how the reinforcement within the basement columns has been arranged. Strengthening works will only be needed to the basement columns if the existing reinforcement is found to not be continuous between Levels B2 and B1. If the reinforcement is found to be continuous, no strengthening works will be necessary.

Structural investigations to prove the construction of the RC columns in the basement have been undertaken, and further investigations are due to take place in due course, to confirm if any strengthening works the basement columns are required and further information will be provided in due course.

Concerns surrounding visibility, and heritage impact, of the plant equipment of the roof

The location of the proposed plant equipment on the roof was assessed through the use of Verified Views which accompanied the Heritage, Listed Building and Townscape Assessment prepared by Purcell and has been submitted in support of the applications for Full Planning Permission and Listed Building Consent. The location and content of the Verified Views were agreed with Camden's Conservation Officer prior to their production and were 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, or not seen, from the public realm. During discussions on the views, it was agreed views from the Brunswick internal plaza would not be included on the basis the plant would not be visible from any location within this locality. It is not within the scope of a Heritage, Listed Building and Townscape Assessment to assess views from private dwellings, to which the Applicant would not have access.

The Heritage, Listed Building and Townscape Assessment notes 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. On all elevations the building is a robust and powerful piece of architecture; its character relies on strong horizontal and vertical axes and concern for these elements has been paramount in the thinking where to position the new condenser units. The roof parapet and the setting back of the housings to the condensers on both sides of the building has further reduced the visibility of the new units from the public realm. In some views the units will be seen as minor additions at the base of the service towers on either side. The impact of these units on the listed building and the conservation area is minimal. The harm from the installation of the proposed plant equipment at roof level is considered to be low adverse in heritage terms.

The proposed photovoltaic panels on the roof will not be visible from anywhere on the building or the public realm surrounding the building. They will sit behind the parapet walls on both blocks and will not impact the listed building. Their addition to the roofscape is beneficial against wider planning policy for climate change mitigation and resilience but there is neutral heritage impact from their inclusion in the scheme.

Lack of acknowledgement of the need for repairs to the existing reinforce concrete structure

At the point of submission of the application for Full Planning Permission and Listed Building Consent, limited information was available on the current state of the Brunswick Centre, and which areas of the building required repair.

As part of the pre-application discussions with the LB of Camden, it was agreed that a structural survey would be undertaken, relating to the areas of high significance in heritage terms, to determine the current state of the building in these locations and likely repairs required. The undertaking of the survey itself was deemed a heritage benefit to offset an element of harm from the proposals. This survey has now been submitted as part of this application, and a heritage offer put forward which sets out the repair works which would be undertaken in relation to this proposal, and how this is deemed to offset the less than substantial heritage harm caused by the proposals.

Transport impacts of the proposals

Loss of residential car parking and reconfiguration of car parking spaces

By way of background, the upper car parking level is let to National Car Parks (NCP) on a commercial lease and is utilised by visitors to the Brunswick Centre (including Waitrose) and the surrounding area. The lower car parking level is included in the Applicant's lease with the London Borough of Camden (Camden Council) and contains residential car parking spaces. The NCP-operated car park currently contains 257 spaces and the residents' car park contains 277 spaces.

As part of the supporting Transport Assessment, prepared by RPS, it has been demonstrated that a survey has been undertaken to assess the usage of the car park over an extended period of time. The results of this survey have assisted in understanding the existing demand for car parking. As part of the proposals, 163 parking spaces would be retained, comprising 118 spaces within the northern section of the car park and 45 car parking spaces within the southern section of the car park, of which 60 are proposed to be provided for residential use and the remaining 103 for NCP use. This provision is considered to meet the current demand requirements for the Centre including visitors to the commercial offer at the Brunswick Centre (including Waitrose), and local residents. These parking spaces will remain accessible from the existing access ramps to the basement level from ground level.

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 complementary use within a mixed-use centre located in a highly accessible location to optimise and make better use of the space.

In relation to the reconfiguration of the car parking spaces, the retained spaces have sought to reflect the existing configuration and dimensions of existing car parking spaces. Associated tracking has been undertaken to demonstrate these spaces are acceptable.

Access to car parking will be available to residents throughout the construction period and further details on this will be released to residents in due course.

Provision of disabled residential parking spaces

It is noted that some residents have queried the number of disabled parking spaces to be incorporated into the proposals. In line with anticipated demand, it is proposed to provide two disabled parking bays for the NCP car park with suitable lift access provided to ground level from these spaces. The residents' car park is proposed to include one disabled parking bay, which would also have suitable lift access for disabled users up to the residential levels. The existing car parking at the Site comprises constrained parking bay dimensions and columns which restrict movement. The proposed residential disabled bay will be well designed with more space than the existing provision to more easily accommodate disabled users' access requirements and will be secured as an accessible bay via a legal agreement with Camden Council. The currently proposed quantum of disabled parking bays also balances the requirement to ensure that sufficient standard parking bays are delivered as part of the proposals in line with anticipated demand. The Applicant notes that the quantum of disabled parking bays may be adjusted following future discussions with Officers and residents if required.

In addition to the on-site provision, surveys of the existing external disabled parking spaces were undertaken prior to submission to confirm that the existing provision will sufficiently accommodate the anticipated demand from the proposed hotel. The closest available disabled parking bay is located 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 on-street disabled parking bays is of a generally level topography and entirely step free, with existing dropped kerb crossings provided on all routes.

Perceived additional strain on local infrastructure

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. Based on the proposed trip generation, it is considered that the local public transport networks can accommodate the demand from the proposal.

Furthermore, the proposals would not generate a significant level of vehicular traffic and hence would not have a significant impact on the capacity of the surrounding highway network. A DRAFT Travel Plan has also been submitted to demonstrate how the proposal would seek to promote the use of sustainable transport modes.

In addition to the response to transport matters above, it is noted that the Council's Transport Officer has reviewed the proposals and considers the scheme to be appropriate in transport terms, subject to the inclusion of S106 obligations which are being discussed at present with the Council.

Land Use

Demand for a hotel at the Site

Several residents raised queries about the demand for a hotel at the Site. A Hotel Evidence Statement has been prepared by Whitbread, the anticipated incoming occupier, and has been submitted in support of the applications for Full Planning Permission and Listed Building Consent.

The Hotel Evidence Statement notes that total market supply for hotels in London is forecast to have declined by circa 3% by 2023 when compared to 2019 levels as independent hotels continue to exit the market. Conversely, the Budget Hotel sector has seen a 3.3% Compound Annual Growth Rate in rooms across London since 2019.

Since the Covid-19 pandemic, the industry has seen the gradual return of inbound travellers to London. This has meant that, whilst the current occupancy within 'Bloomsbury/Covent Garden/Soho' submarket is below 2019 levels (82% currently vs 93% in 2019), there is significant scope for recovery to pre-pandemic levels. In addition, the existing Premier Inn offerings that sit within this submarket (Bloomsbury/Covent Garden/Soho) are outperforming the sector (88% vs 80% for the rest of the market).

Consequently, whilst occupancy levels are not as strong as 2019 levels, they are expected to return to pre-pandemic levels and Whitbread consider a hotel in this location will meet current and future demand.

Impact on the existing retail offer at the Brunswick Centre through inclusion of F&B offer

Certain consultation responses queried the impact of the proposed hotel on the existing retail offer at the Brunswick Centre. Whilst the proposed hotel will deliver an F&B area, it is anticipated that this will be principally used by hotel guests. The F&B area is anticipated to deliver a high-quality but limited menu in line with existing Premier Inn hubs meaning that the offer will not compete with the varied F&B offer already existing at the Brunswick Centre. The introduction of additional visitors to the Brunswick Centre through the incorporation of a hotel will also provide additional footfall to help support the existing offer at the Site.

Design

Use of Circadian lighting and concerns on health of visitors

Circadian lighting refers to an artificial lighting system that is designed to have a biological impact on the human circadian system. With true circadian lighting, our bodies are getting better daytime light signals which can help improve sleep, mood, and our overall sense of well-being. With LED light sources comes the ability to dim and colour mix, creating new dynamic lighting systems that can mimic the spectrum of daylight. A circadian lighting system is, in essence, an artificial 'sunrise to sunset' that travels through illuminance levels and colour spectrums from a warm colour spectrum to brighter, cooler, and back again.

Furthermore, the supporting Design and Access Statement, prepared by Axiom Architects, provides further detailed information on the lux levels for the proposed circadian lighting and demonstrates that such lighting will exceed the minimum BRE target criteria. Therefore, it is considered that the proposed circadian lighting will not have an adverse effect on guests of the hotel and on the contrary will be beneficial.

Sustainability measures including PV panels

As part of the scheme and as set out above, it is proposed to install a strip of PV panels on each of the upper-most roofs of the Brunswick Centre. The energy produced by these PV panels is anticipated to contribute to the energy supply of the hotel.

Some residents have raised concerns surrounding the installation of the PV panels regarding the use of the generated electricity. Some residents are concerned that the installation of PV panels for the use of the proposed hotel would impede the building's capacity to decarbonise in future years.

The installation of PV panels is one examples of decarbonisation measures which are being adopted by building owners in response to the climate crisis. The use of electricity generated through PV panels will be an important, but small, contribution to the decarbonisation of the Site. The full decarbonisation of any building, including the Site, could not be achieved through the installation of PV panels alone and would not prevent further decarbonisation works to the building in the future.

To exclusively serve the hotel via the proposed PV panels is not driven by financial gain for the hotel, but rather by technical limitations. Connecting the PVs directly to residents' flats is not feasible due to restrictions in parallel connections with the utility network upstream of the meters. While some or all of the PV power could be made available to residents for communal services, this would reduce our abilities to be policy complaint on policy grounds relating to the proposal, and this is likely to result in exporting unused electricity to the grid, benefiting the electricity company more than the residents.

The hotel with PV is a good engineering balance because it has a good demand all the time, and all of the PV output can be used on Site.

Concerns regarding heat transmission

The proposals have considered and proposed relevant measures to mitigate the risk of overheating by the proposed hotel. The proposal hotel will be temperature controlled with no direct impact on the residential units located above the use. In addition, most of the heat rejecting plant equipment is proposed to be located on the upper-most roof of the building which will allow sufficient ventilation for the heat generated.

Security of residents

Concerns have been raised by residents regarding the impact of the proposals on their security.

The security of both hotel guests and residents has been a key consideration through the design development stage and the proposals were discussed with the Designing Out Crime Officer prior to submission. The Brunswick Centre is actively monitored by CCTV which covers all public areas in the car park and the building with security guards patrolling the Site throughout the day and night. No change to the existing management of the Brunswick Centre from a security perspective is sought as part of the proposals. In addition to the existing security measures, it is proposed to utilise 24/7 CCTV coverage for the hotel which will be actively monitored. Hotel guests will also not have access to any residential areas within the Brunswick Centre as per the existing situation.

Consultation

As set out above, some consultation responses were received stating that residents were not notified of the applications' submission, the Applicant subsequently queried this with Officers who confirmed that Camden do not notify neighbours of planning applications by letter and haven't done so since 2016. A total of 11no. site notices were put up in the streets surrounding the Brunswick Centre to inform the public of the proposed development and the application was also advertised in the local press (Camden New Journal) on 5 October 2023. Nevertheless, Officers reviewed the number of neighbour notification notices erected around the Site and additional notices were erected, where required. The consultation period was consequently extended until 14 December 2023 to enable all interested parties an opportunity to provide a consultation response.

Conclusion

This letter has been prepared to provide a comprehensive response to matters raised by consultees during the consultation period.

Overall, it is considered that appropriate responses have been provided to respond to concerns raised, alongside the Applicant's commitment to continued engagement with relevant stakeholders, and it is requested that the scheme now be taken forward to Planning Committee for determination.

We trust that this response will be taken into consideration in the determination of the application. Please do not hesitate to contact Nia Fraser (0207 333 6299), Sam Neal (0203 486 3312) or Hannah Davies (0207 333 6221) of this office should you have any queries.

Yours faithfully,



Gerald Eve LLP

Encl.