

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

**FAO: Brendan Versluys**

**Our ref: NFR/SNE/FPL/U0013257**

**Your ref: PP-13577343**

**Brunswick Centre, London, WC1N 1AE ("the Site")  
Town and Country Planning Act 1990 (as amended)  
Planning (Listed Buildings and Conservation Areas) Act 1990  
Application for Full Planning Permission and Listed Building Consent**

We write on behalf of Lazari Properties 2 Limited ("the Applicant") to apply for Full Planning Permission and Listed Building Consent for lighting improvements to The Coram Arcade, retail entrances and the canopy of the shopping arcade at The Brunswick Centre.

Full Planning Permission and Listed Building Consent is sought for the following:

"Replacement of existing canopy lights, installation of new linear lights surrounding retail entrance, removal of existing ceiling features and fixings in Coram Arcade and installation of panel ceiling lights, and associated works."

## **The Site**

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.

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.

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".

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.

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.

The surrounding uses comprise predominantly of retail, commercial, and residential uses. The surrounding building are between 4-6 storeys in height, with a variety of styles. To the east of the Site is open space known as Brunswick Square Gardens.

## Planning History

An online review has been undertaken of the Camden online planning register to determine the relevant planning history for the Site. A summary of the relevant applications is as follows:

Full Planning Permission (ref. 2023/3870/P) received a resolution to grant on 03 March 2024 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.”**

Associated Listed Building Consent (ref. 2023/3901/L) received a resolution to grant on 03 March 2024 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.”**

Full Planning Permission (ref.2022/2425/P) and associated Listed Building Consent (ref. 2022/3137/L) approved on 25 July 2022 for:

**“The replacement of the existing shopfront and internal alterations associated with the amalgamation of the existing units 12 & 14.”**

Full Planning Permission (ref.2020/0939/P) and associated Listed Building Consent (ref. 2020/1437/L) was approved on 24 March 2020 for:

**“Replacement of 3 shopfronts to retail units on the north-west elevation fronting Handel Street, involving the removal of mullions and grilles to all units and replacement with clear glass, and addition of glass canopy above entrance to Unit 68.”**

Full Planning Permission (ref. 2019/5822/P) was approved on 13 December 2019 for:

**“Installation of new entrance doors to shopfront.”**

Full Planning Permission (ref. 2019/5517/P) and associated Listed Building Consent (ref. 2019/5726/L) was approved on 13 November 2019 for:

**“Installation of painted mild steel handrail to be fixed to the existing concrete balustrade at level C (podium)”**

Full Planning Permission (ref. PSX0104561) and associated Listed Building Consent (ref. LSX0104562) 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.”**

The above planning history demonstrates that various works have been carried out to the Brunswick Centre in recent years to assist in improving the commercial offer on the Site, and improve the experience for visitors.

## **The Proposals**

The Proposed Development seeks to deliver an enhanced lighting scheme that will provide an ambient and pleasurable atmosphere whilst critically ensuring improved lighting for security reasons.

As part of their continued stewardship of the Brunswick Centre, the Applicant regularly monitor the occupation and vacancy levels of the Site as well as footfall within the Site. Through this continued monitoring, it has been identified that the shopping area and central outdoor plaza of the Brunswick Centre is becoming increasingly underutilised and unsafe, in part, due to the lighting currently not being sufficient for the space.

To assist in improving the lighting levels within the Centre, the applicant seeks permission for the installation of the following lighting:

- Installation of replacement lighting, and associated fixings, under the canopies along the shopping street;
- Installation of linear LED lighting around the entrance to Waitrose; and
- Installation of LED lighting panels to the ceiling of Coram Arcade.

The Proposed Development would deliver a number of benefits, both in respect of the general public and local residents, which are summarised below.

1. Minor alterations and enhancements to the lighting already present on site to improve the security of the area, particularly for periods of the year that experience less daylight hours and also for nighttime hours;
2. Improved lighting within the shopping centre to ensure increased footfall, improving the visitor economy in the area and continuing to provide local employment opportunities; and
3. A sensitively designed lighting scheme that respects the Brutalist architecture of the listed Brunswick Centre.

The proposals are fully detailed, outlined and assessed within the corresponding application documentation included as part of this submission.

## **Pre-Application Discussions**

This application for Full Planning Permission and Listed Building Consent follows pre-application consultation and discussion with Camden Council.

A pre-application discussion was held on site on the 17<sup>th</sup> of July 2024 with the Case Officer and Heritage Officer to discuss a wider scope of lighting works across the site.

The Applicant has sought to respond positively to the matters raised during this engagement and this submission takes these comments into account.

## **Planning Policy Context**

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.

For the purposes of the proposed development, the adopted Development Plan comprises:

- The London Plan (2021)
- Camden Local Plan (2017)

As part of the adopted planning policy map, the Site falls under the following designations:

- Bloomsbury Conservation Area;
- Local Plan Central London Area; and
- Protected Vistas; Blackheath Point to St Paul's Cathedral, Greenwich Park Wolfe statue to St Paul's Cathedral and Primrose Hill summit to St Paul's Cathedral.

In terms of emerging policy, Camden are currently in the process of reviewing the Local Plan. The draft Local Plan is currently in the early stage of development and Camden consulted on the draft Local Plan (Regulation 18 consultation) between 17 January to 13 March 2024. The fully reviewed new Local Plan is expected to be adopted in the summer of 2026. Therefore, at this stage, in line with paragraph 48 of the NPPF, limited weight should be applied to policies within the draft Local Plan. They have, therefore, not been considered in detail in this letter.

Whilst not forming part of the Statutory Development Plan, the following documents remain important material considerations:

- National Planning Policy Framework (NPPF) (2024);
- National Planning Practice Guidance (NPPG) (as amended); and
- London Borough of Camden's Supplementary Planning Documents.

## **Statutory Legislation**

The statute regarding the heritage environment is relevant to this application. Both the site's historic fabric and the surrounding environment have been carefully considered in the development of the proposals having regard to the statutory legislation below.

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant listed building consent, special regard shall be paid to the desirability of preserving the building or its setting or features of architectural or historic interest which it possesses.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that local planning authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when considering applications.

Section 72 of the same Act states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

## **Planning Policy Assessment**

### Amenity

Camden Local Plan Policy A1 states that to manage the impact of development the Council seek to protect the quality of life of occupiers and neighbours and therefore consider the impact of artificial lighting levels as a factor.

Camden Local Plan Policy supporting paragraph 6.6 states that Camden's dense character means that light pollution can be a bigger problem in the borough than in lower density areas where uses are not so close together. Artificial lighting should only illuminate the intended area and not affect or impact on the amenity of neighbours. A similar approach is referred to in the Camden Amenity CPG.

As demonstrated in the supporting Design and Access Statement, prepared by Studio 29, careful consideration has been given to the proposed lighting installations on the Site to achieve the main objectives of improving the lighting for security reasons during the evenings and darker winter months, whilst also providing high quality, aesthetically pleasing lighting which is deemed more appropriate for a retail location and will aim to assist in improving footfall to the area.

The supporting Design and Access Statement demonstrates the lighting assessment that has been undertaken to determine the existing, and proposed, lighting levels for the Site. This assessment concludes that the lighting proposed will assist in improving lighting to the areas where the installations are undertaken, without creating adverse impacts to surrounding uses, including the residential uses at the upper levels, through light spill/glare etc. Further measures are also proposed to assist in mitigating light impacts on surrounding uses, through the suggestion of lighting controls, including the dimming of certain lighting later in the evening, more detail on this is provided in the Design and Access Statement.

In respect of the proposals impact on amenity, the proposed works will elevate the street whilst making visitors feel more safe and secure in their surroundings as well as provide an enhanced sense of belonging and quality of life for the residents and visitors.

Overall, the proposed lighting scheme will help make residents and visitors feel more safe and secure in their surroundings, increase foot fall, aiding growth within the centre, whilst mitigating light pollution onto neighbouring properties through a number of strategies. It is therefore concluded that the proposed design complies with Policy A1 of the Camden Local Plan.

## Heritage

Paragraph 207 of the NPPF states 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.

Paragraph 212 of the NPPF states 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.

Paragraph 213 also states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Part C of Policy HC1 of the London Plan outlines that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Policy D1 of Camden's Local Plan sets out that the Council will seek to secure high quality design in development and requires that development respects local context and character.

Policy D2 of Camden's Local Plan sets out that the Council will seek to preserve and where appropriate, enhance heritage assets and their settings, including conservation areas. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits.

In terms of design, careful consideration has been given to the proposed lighting installations to make sure they are sympathetic to the listed building and of a high-quality and are appropriate for the area they are located within, as well as serving the intended purpose of improving lighting for security purposes, and creating more inviting spaces for visitors.

In terms of heritage impact, a supporting Heritage Impact Assessment ('HIA'), prepared by Purcell, has been submitted as part of the application.

The supporting HIA has undertaken an assessment of the heritage asset, the relevant significance of the building, and the impact the proposed lighting will have on the listed building, and Bloomsbury Conservation Area.

In conclusion, the HIA states that the proposed lighting will cause no harm to the listed building in NPPF terms and there are no impacts on any other heritage assets nearby. Such is the nature of the Brunswick that there is also no impact on the wider conservation area and therefore the character and appearance of the Bloomsbury Conservation Area is maintained.

Therefore, the proposal complies with the statutory legislation, NPPF, London Plan Policy HC1, and Local Plan Policies D1 and D2.

### **Summary**

The Proposed Development seeks to deliver an enhanced lighting scheme that will ensuring improved lighting for security reasons whilst providing an ambient and pleasurable atmosphere sympathetic to the Brunswick Centre.

The proposal has been designed to a high-quality, which will appropriately mitigate any amenity impacts on surrounding uses. In addition, the proposal has been assessed to cause no harm to the heritage asset and will maintain the character and appearance of the Conservation Area.

Therefore, the proposal complies with the Development Plan and should be approved without delay.

### **Application Documentation**

In accordance with the Camden Council's validation requirements, we have submitted the following documents through the Planning Portal, alongside this cover letter:

1. Application Forms and Notices, prepared by Newmark;
2. Cover Letter, prepared by Newmark;
3. Design and Access Statement (including a lighting assessment), prepared by Studio 29;
4. Site Location Plan, prepared by Newmark;
5. Existing and Proposed Plans and Sections, prepared by Studio 29; and
6. Heritage Statement, prepared by Purcell.

The requisite application fee of £1,242.00 (including the £70.00 Planning Portal administrative fee) has been paid by the Applicant on submission of this application via the Planning Portal.

We trust that we have provided all of the material required for the purposes of validation and therefore await confirmation of the registration and validation of this application shortly.

Please do not hesitate to contact Sam Neal (0203 486 3312) or Flossie Plowden (0203 486 3790) of this office should you have any queries.

Yours faithfully

Newmark Gerald Eve LLP

**Newmark**

Encs. As above



