

Dear Ms Heavey,

Re: 2014/3640/P and  
2014/3806/L

I write to oppose the above  
planning application(s).

Being a local resident I was  
aware of the totally unsuitable nature,  
in many respects, of these plans.

But, yesterday, I received a  
copy of the attached and realise the  
full negative impacts on the  
architecture, structure, residents,  
etc of the Brunswick Centre,

Therefore, I must write to  
support opposition and rejection  
and I trust these plans will be  
thrown out.

Eimear Heavey  
London Borough of Camden  
2nd Floor, 5 Pancras Square  
c/o Town Hall, Judd Street  
London WC1H 9JE

Dear Ms Heavey

**Eye Catcher Proposed Development, Brunswick Centre – Ref. 2014/3640/P and 2014/3806/L**

I wish to make the following comments in objection to the proposed planning and listed building applications for the 'Eye-catcher' development, references as stated above:

**1. Impact on Amenity of Neighbours**

**Location/ Footprint**

1.1 The proposed staircase, lift and service shafts to the design will restrict pedestrian movement and views through the eastern entrance to the Brunswick Centre. The submitted plan Drawing 2937a\_D\_110 does not show the proposed extension of the Renoir cinema, recently consented (ref. 2014/0481/P and 2014/0593/L). The consented application reduced the opening width of the pedestrian passage by approximately 4 metres, the design for the proposed application will reduce the opening by a further approximate 2.5 metres by introduction of a lift and stair – a joint reduction to these applications of more than half the existing opening into the centre. The reduced opening will deteriorate the amenity of the public space and compromise the safe and equal access to the building by restricting pedestrian movement.

I understand also that the recent footfall survey submitted by the developers was not totally representative.

1.2 The location of the proposed development is too close to the residential units to the Brunswick Centre. The Design and Access Statement incorrectly states under item 6.15 of the submitted Planning Statement that 'the proposed development will not cause any loss of privacy... to the residential units... as they are located on the upper floors of the building.' This statement is incorrect as residential units are located on all floors of the building above ground level, including the levels of the proposed development. There are currently no A3 uses at the 2nd floor level, where this application proposes to develop the restaurant/bar and this new use to this level will harm the amenity of the neighbouring residents and could form a precedent for further harm to occupiers of the building.

1.3 The location of the proposed design is significantly closer to the residential units than the consented 'Eye-catcher' design that was granted planning consent in 2003 although it is questionable whether in fact his consent is still valid. The current proposal sits directly under the flats and protrudes significantly into the main precinct – it directly abuts the balconies, living room and bedroom windows of the flats above it. The position of the proposed design would be harmful to the amenity of the neighbouring residents. The proposed restaurant has windows within metres of the residential units above it and this arrangement will

be harmful to the amenity and privacy of these residences through noise generation and by creating direct views into these properties. The proposal would be more harmful to the amenity of its neighbours than the 2003 consented scheme, due to it being in closer proximity to the existing residential and commercial units. This is contrary to Policy DP12 as the proposed use of the building would be harmful to the character, function, vitality and viability of the centre.

1.4 The location and design of the proposal creates a significant loss of privacy to the residential units opposite, in Foundling Court. The design creates a direct line of sight from the fully glazed west elevation of the restaurant into the flats opposite. This would cause overlooking and lead to a loss of privacy to the existing residential units. The nature of the proposed restaurant would also cause noise and light pollution, which would harm the amenity to the existing residential units and be contrary to Camden's Planning Guidance CPG4.

1.5 The proposed scale and footprint of the development would be contrary to National Planning Policy Framework 2012, London Plan 2011, London Borough of Camden LDF Core Strategy Policy CS5, CS14, DP26 and Camden Planning Guidance CPG6.

#### **Noise**

1.6 The location of the proposed development and the nature of the space as A3 use would generate noise through its use that would be harmful to the neighbouring residential units. The noise generated by people using the restaurant would only need to travel metres from the windows of the proposed design to the opening windows of the flats above it. Access to the restaurant, via an open platform would lead customers visiting the premises to generate noise and activity which would be perceived by the locals and due to its raised position this would travel further and be more of a disturbance than the current levels of noise generated at ground level. The nature of the hours of use of the restaurant would be intrusive and harmful to the amenity of neighbouring residents and contrary to Core Strategy Policy CS7 as well Policy DP12. The cumulative impact of use within the centre should also be considered as this increase will contribute to an existing concern of the local community.

1.7 The proposed access for deliveries to the unit and removal of refuse appears to be solely via a public use glass elevator that passes to basement level. One entry to the elevator is contained within the basement but to the restaurant level the elevator opens out onto an external platform. The noise that would be generated to service a premise of this type, at the level of the external platform would be considerable and the hours of servicing unfeasible within the local community. The proposed access strategy for the design would create significant noise pollution that would be harmful to the amenity of the neighbouring residential and commercial units. This disturbance would be contrary to National Planning Policy, as well as Core Strategy Policy DP12 as the proposed use of the building would be harmful to the character, function, vitality and viability of the centre.

1.8 It should be noted that condition 7 of the 2003 planning consent for the development of the shop units to the Brunswick Centre, requires that no servicing of any of the shops should take place from street level, to prevent noise nuisance for residents. Despite this condition, commercial units to the Brunswick Centre are regularly serviced from the street in a straightforward breach of planning and the proposed access strategy for the restaurant is unrealistic in its proposal to service the proposed unit using only a glass lift. The proposed design does not present a workable model that can be serviced without significant harm to neighbouring amenity and the infringement of planning conditions already imposed on the use of the building.

1.9 The design proposal drawings are limited in their information for how mechanical extraction will be provided to the restaurant. The service shaft – which is not adequately labelled on the drawings – is independent of the restaurant space so it must be assumed that a suitable attenuated strategy has not been developed for the design. The proposal indicates that a suitable strategy is not feasible and that the

noise generated by the extraction would be significant and harmful to the amenity of the residents as well as neighbouring commercial units and day-to-day users of the building and Contrary to Policy DP26.

1.10 There is no acoustic survey submitted with the application and how the proposed mechanical extraction system and the noise pollution generated by the development will be dealt with has not been adequately addressed in the proposals. The risk of causing harm to the amenity of the area is significant and against planning policy.

1.11 The proposed development seeks to attach to the existing structural columns to form partial support for the elevated restaurant unit. It should be noted that the 2003 consent to develop the building created a similar condition to the area developed and now used by Waitrose. This development led to serious issues with noise pollution caused through vibration up the columns of the original structure. Waitrose had to undertake costly remedial work to cushion the structure in the basement to reduce the noise transfer and disturbance to the residential units above – work that took many years to resolve. Given the nature of the proposed development it is likely that significant disturbance would be generated from the proposed use of the restaurant and from the mechanical extraction to it. This noise that would likely pass to the original structure of the building would cause nuisance to the residential units above the proposed development as well as to the cinema below. As the columns are exposed it is unlikely a suitable cushioning strategy could be developed that would alleviate this problem. The proposed design does not adequately address this and as it stands it would cause significant harm to the amenity of the neighbouring units and to the listed status of the building.

1.12 Use of the studio units to the 2nd floor level, where the proposed restaurant would be built, have restrictions on their hours of use due to the detrimental impact of late working hours on the neighbouring residential units. The proposed development of a restaurant to this same level and its location under the 3rd floor flats would be contradictory to the current permitted hours of operation in the building and the resulting noise from this use would be harmful to the peace and amenity of the neighbouring residents.

## 2. Impact on the Special Character of the Listed Building

### Views

2.1 The proposed development would significantly detract from the exposed structural A-frame and columns facing Brunswick Square. The stepped concrete section to the building, exposed to the east elevation over the Renoir cinema, is one of the strongest characteristics of the building and constitutes the special artistic and architectural interest for which the centre is listed. These seven arches represent The Seven Lamps of Architecture by John Ruskin who was a resident in adjoining Hunter Street and this proposal would block views of this part of the building and alter the context in which the centre is viewed from Hunter Street, Coram Street and Brunswick Square harming the appearance of the listed building and character of the immediate area. This will be in conflict with the protected listing of the building and with London Borough of Camden LDF Core Strategy Policy CS14, DP24 and DP25.

2.2 It is clear from the submission that the proposed design has significant proportions of solidity. The rendered views of the proposals submitted within the Design and Access Statement show large elevations of glass, however it is believed that these views are misleading in the level of transparency the proposed development will achieve and that the proposal will appear more solid and significant block views of the listed structure.

## Materials

2.3 The proposed designs use of aluminium cladding panels would be at odds with both the form and material palette of the listed building - contrary to points 6.4 and 6.5, 6.9 and 6.10 of the submitted Planning Statement, which are merely subjective conjecture which we would refute (similar to point 5.11 of the Heritage Statement) - constituting its artistic and architectural interest. The use of these panels as a "veil" to "conceal the glass skin behind" is counterintuitive and contributory to the increased massing, whilst the precedents used for the derivation of these proposals have no relation to the design or materiality of the Brunswick Centre. The apparent bulk of the built proposal and the proposed painted "bold, decisive (D&A statement, p.58)" steel truss frame construction would form a significant detraction from the concrete frame to the housing above and the diminutive structure of the existing cinema entrance. As is clearly evident in the Design and Access Statement rendered imagery, blocking the integral link to Brunswick Square, contrary to point 5.11 of the Heritage Statement.

I also wish to make you aware of the significant public interest that has been raised in opposition to the development proposed by this application. The following should be noted as references of objection to the proposal:

1. The letter sent by the Brunswick TRA to GL Hearn, and copied to you, on 20th June 2014. This letter states how the TRA felt that the residents were not properly consulted by the building owners over the design proposed by this application and that they would make their objection to the proposals through the planning process rather than the consultation scheme proposed by the building owner.
2. The paper petition, signed by residents of the Brunswick Centre noting their objection to the proposed application.
3. The online petition lodged at change.org, which counts as a record of the significant public interest this application has raised and the unified view that the proposal will harm the historic character of the building, damage the value of the public amenity to the Brunswick Centre and to the residential units above. It should be noted that the signees to the petition are both local residents, users of the Brunswick Centre and people who know and love the building and are concerned that the proposals will cause irreparable damage. Included in the signees are internationally acclaimed architects, historians and journalist who are unanimous in their opposition to the proposed application.
4. application.
5. Article in the Camden New Journal, Thursday 24th July 2014, recording the public importance of the objection against the application. Further article in the Evening Standard.

Please accept this as my objection to the proposed development and refuse the application.

Yours sincerely,

G. Fenmore-Jones (local resident)  
Flat 69  
Sandwich House  
Sandwich Street  
London. WC1H 9PP

7/10/2014