



Dear Mr Diver

The Marchmont Association wishes to express support for the Brunswick TRA's objections to the above applications, which have been laid out in a cogent way.

We are, however, puzzled as to why the applicant hasn't consulted the occupants of the 400+ flats above the shopping centre, in light of the obvious sensitivities and historical concerns expressed by Brunswick TRA about any proposals to increase food and drink outlets (A3) in the centre, which would doubtless have been brought to their attention by the owner and management of the building.

Submitting this application without the benefit of pre-planning advice demonstrates naivety, at best, and arrogance, at worst.

If they had consulted residents they would have been left in no doubt that this is an unwelcome development, fraught with potential problems.

Their application fails to acknowledge that this is primarily a residential building, with homes outnumbering commercial outlets by about 10 to 1.

Our specific concerns are:

1. The change of use from A1/Retail to A3/Restaurant with associated A5/Takeaway is in conflict with the standards of quality aimed for under the approved Allied London Redevelopment plans of 2003, and the recently stated aspirations of the current owner.
2. The applicant states that this will increase the vibrancy of the centre to the benefit of other businesses, without reference to the negative impact on residents and the local environment often associated with fast food takeaway operations. ICCO are promoting themselves as a 'desirable' and allegedly 'unique' offer for Bloomsbury, which will increase footfall and so be good for other businesses in the Centre. Their claim is based on the fact that they produce traditional, sour dough pizza, baked in two authentic, electric pizza ovens (not exactly traditional). Franco Manca in Bernard Street already offer the same sour dough pizza, albeit in a wood burning 'tufae' brick oven.
3. The proposed hours of operation - Mondays to Fridays, 7am to 11pm, and Saturdays and Sundays 9am to 11pm - are inappropriate for the residential/commercial mix, and will cause additional noise nuisance for residents late at night.
4. Pizzas are claimed to be the only primary cooking to be undertaken on site, with cooking fumes vented to the service area at the rear with "special filters", which they claim will have "No associated noise or smells". We feel this is an entirely optimistic claim, and in view of the serious existing issues with ventilation from cooking permeating residential properties above the commercial units, we feel this should be fully tested by the Council and independently verified using the expertise of qualified, independent experts.
5. The applicant's Design and Access Statement refers to guidelines pertaining to the Brunswick Neighbourhood Shopping Centre, citing the 100 sq metre limit on unit size for A3 uses. They declare that although Unit 18 is 357 sq metres, only 175 sq metres are on the ground floor, 50% of which is "back house". This is a blatant misinterpretation of the regulation, which alone justifies refusal of the application.
6. They have also cited the consent granted to Unit 2 as recent precedent in their favour. However, primary cooking has not been permitted at Unit 2, so this argument fails.
7. The applicant rehearses the percentage argument, quoting the maximum permitted number of A3, A4 and A5 (food, drink and entertainment) units as 25%, and claim this currently stands at 20.5, with their change of use only marginally tipping the balance over this limit by 0.6%. The rule is the rule and should not be flouted, although we dispute the figures on which their assumption is based, because a number of the designated A1 units are in fact operating as A3 by preparing cooked food on the premises. Brunswick TRA

have highlighted discrepancies with the way these percentages are calculated. There has also been an alarming increase in void units since the Council last assessed the commercial mix.

8. The applicant claims that the site has been vacant since May 2017, which they use to justify the change of use. However, they haven't submitted evidence to show how the unit has been marketed, which they should be required to do by Camden. We noticed To Let signs appearing in several larger vacant units for the first time in recent weeks.
9. We have concerns about the proposed new venting into the shopping centre, both from a design point of view and because the extracted air may discolour the attractive awnings above the shop front. Also, any new ventilation into the rear of the premises has to go somewhere. This has been downplayed by the applicant.
10. We also object to the internally illuminated projecting signs – only one of which is permitted on the shop front.

Yours faithfully

Ricci de Freitas

On behalf of the Marchmont Association Committee