

Address:	Brunswick Centre Estate, Brunswick Centre, London, WC1N 1AE		3&4
Application Number(s):	2023/3870/P & 2023/3901/L	Officer: Brendan Versluys	
Ward:	Bloomsbury		
Date Received:	15/09/2023		
Proposal:	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.		
Background Papers, Supporting Documents and Drawing Numbers:			
Existing Drawings:			
4742-PA1- 001, rev B; 4742-PA1- 002, rev B; 4742-PA1- 003, rev F; 4742-PA1- 004, rev C; 4742-PA1- 005, rev C; 4742-PA1- 008, rev B; 4742-PA1- 009, rev B; 4742-PA1- 010, rev B; 4742-PA1-010R, rev B;4742-PA1-011, rev B; 4742-PA1-012, rev B; 4742-PA1-013, rev B; 4742-PA1-014, rev B; 4742-PA1-015, rev B; 4742-PA1-016, rev B; 4742-PA1-017, rev C; 4742-PA1-018, rev B;			
Proposed Drawings:			
4742-PA1-098, rev C; 4742-PA1-099, rev C; 4742-PA1-100, rev B; 4742-PA1-101, rev B; 4742-PA1-130, rev C; 4742-PA1-131, rev B; 4742-PA1-132, rev C; 4742-PA1-133, rev C; 4742-PA1-134, rev B; 4742-PA1-135, rev C; 4742-PA1-200, rev B; 4742-PA1-301, rev B; 4742-PA1-302, rev B; 3608-PSH-XX-XX-DR-M-7900, rev P1; 3608-PSH-XX-XX-DR-M-7901, rev P1; 3608-PSH-ZZ-06-DR-E-9101-1; 3608-PSH-ZZ-06-DR-E-9101-2; 3608-PSH-ZZ-06-DR-E-9101-3; 3608-PSH-ZZ-06-DR-E-9101-4; 3608-PSH-ZZ-06-DR-M-7002-1, rev P1; 3608-PSH-ZZ-06-DR-M-7002-2, rev P1; 3608-PSH-ZZ-06-DR-M-7002-3, rev P1; 3608-PSH-ZZ-06-DR-M-7002-4, rev P1; 3608-PSH-ZZ-B1-DR-M-7000-1, rev P2; 3608-PSH-ZZ-B1-DR-M-7000-2, rev P2; 3608-PSH-ZZ-B1-DR-M-7000-3, rev P2; 3608-PSH-ZZ-B1-DR-M-7000-4, rev P2; 3608-PSH-ZZ-B1-DR-M-7004, rev P1; 3608-PSH-ZZ-B2-DR-M-7001-1, rev P2; 3608-PSH-ZZ-B2-DR-M-7001-2, rev P2; 3608-PSH-ZZ-B2-DR-M-7001-3, rev P1; 3608-PSH-ZZ-B2-DR-M-7001-4, rev P1; 3608-PSH-ZZ-ZZ-DR-E-8800, rev P1; 3608-PSH-ZZ-ZZ-DR-M-7003, rev P1; 3608-PSH-ZZ-ZZ-DR-M-7005;			
Documents:			
BREEAM pre-assessment prepared by Greengage, dated July 2023; Cumulative Impact Area Statement and Checklist prepared by Camden Council, dated 13/07/2023; Construction/Demolition Management Plan pro forma prepared by Eddie Halligan, dated 20/07/2023; Delivery and Servicing Management Plan prepared by RGP, ref. 2023/5262/DSMP01, dated August 2023; Operator's Hotel Management Plan prepared by Whitbread; Employment and Training Strategy prepared by Whitbread, dated August 2023; Energy Statement prepared by Greengage, dated July 2023; Fire Safety Statement prepared by Orion Fire Engineering, ref. OF-000957-OFS-01-C, dated 4/09/2023; Flood Risk Assessment & Drainage Report prepared by Heyne Tillett Steel, ref. 2911, rev 04, dated August 2023; Heritage, Listed Building and Townscape Assessment prepared by Purcell, rev 2, dated August 2023; Heritage Offer/Concrete Repair document, dated February 2024;Statement of Community Involvement prepared by Kanda, dated July 2023; Structural Planning Report prepared by Heyne Tillett Steel, ref. 2911, dated 29/08/2023; Sustainability Statement prepared by Greengage,			

dated July 2023; Healthy Streets Transport Assessment prepared by RGP, dated September 2023; Travel Plan prepared by RGP, dated September 2023; Waste Management Plan prepared by RGP, dated August 2023; Design and Access Statement prepared by Axiom Architects; Acoustic Planning Report prepared by Clarke Saunders, dated 4/08/2023; Air Quality Assessment prepared by Phlorum, ref. 12129.S, dated 14/06/2023; Arboricultural Method Statement prepared by James Blake Associates, ref. JBA 23/138 AR01, rev E, dated 29/08/2023; Planning Statement prepared by Gerald Eve, dated September 2023; Rapid Health Impact Assessment Matrix prepared by Gerald Eve, dated 05/10/2023; Hotel Evidence Statement prepared by Whitbread, dated 22/09/2023; Air Quality Proforma prepared by Gerald Eve; Energy and Sustainability Proforma prepared by Gerald Eve.

RECOMMENDATION SUMMARY:

- i) Grant conditional planning permission subject to a Section 106 Legal Agreement**
- ii) Grant listed building consent**

Applicant:	Agent:
C/O Agent	Gerald Eve LLP One Fitzroy 6 Mortimer Street London W1T 3JJ

ANALYSIS INFORMATION

Land use details				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
C1	Hotel	-	6,538	+6,538
Sui Generis	Car park	17,637	5,751	-11,886
E	Commercial, business and service	555.5	-	-555.5

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	534	160	- 374
Car - Disabled accessible	-	3	+ 3
Cycle Type	Existing spaces	Proposed spaces	Difference

Cycle – residential long stay	0	20	+ 20
Cycle – commercial long stay	0	11	+11
Cycle – short stay (all uses)	0	5	+5

EXECUTIVE SUMMARY

- i) The application relates to The Brunswick Centre, a Grade II listed residential and shopping centre in Bloomsbury. The site lies within Bloomsbury Conservation Area, and The Brunswick Centre was designated as a Grade II listed building (listing ref. 1246230) on 14 September 2000. The site includes a two-storey subterranean basement (upper and lower basement levels) which is currently used for residential and commercial car parking, and plant/drainage associated with the above ground uses.
- ii) The proposal principally relates to repurposing part of the Centre's existing underground car park, to an underground hotel. The underground car park is partly occupied by NCP (National Car Parks), with some spaces leased to London Borough of Camden for residents parking, and has been identified as being underutilised in recent times. The applicant has therefore proposed to repurpose part of the underutilised two-storey car park beneath the Brunswick Centre to deliver a sustainable, smart hotel, to complement the existing uses at the site and optimise the potential of the site.
- iii) The underground hotel would comprise 207 bedrooms and include a reception area and ancillary F&B area. The majority of the function, and floor area, of the proposed hotel will be located at basement level, with an ancillary entrance at ground floor level, and associated plant and PV panels located at roof level. The hotel would be accessed from ground level with the reception being proposed to be located in an existing retail unit, with lifts and staircase providing access to the upper basement level.
- iv) Of the 530 existing car park spaces, approximately 160 car parking spaces will be retained for use by visitors to the Brunswick Centre, including Waitrose visitors, as well as the residents of the Brunswick Centre.
- v) It is anticipated that the proposed hotel will be occupied by Whitbread under their brand of 'Hub by Premier Inn'.
- vi) The applicant has undertaken extensive consultation and community engagement with LBC and other relevant stakeholders, prior to submitting the planning application.
- vii) The principal construction works will involve the lowering of part of the existing basement slab currently separating the upper and lower basement levels, necessary to achieve required floor to ceiling heights for the proposed hotel. Once lowered, the upper basement level of the slab will form the proposed hotel, with the lower basement level comprising associated drainage. The basement slab,

either side of the proposed hotel, will remain untouched during the process and will maintain existing floor to ceiling heights for the existing car parking.

- viii) The hotel will be served by artificial Circadian Lighting, proposed within the lightwells between the proposed hotel rooms which utilises daylight replication technology to provide a natural spectrum of light from dawn until dusk following the human Circadian rhythm.
- ix) With regards to heritage, the scheme causes a medium amount of less than substantial harm from the changes to plan form and disturbance of fabric to the existing underground car park and retail unit, along with the installation of PV panels and plant at roof level. This has been given considerable weight and importance. The level and nature of harm has been carefully considered, and balanced with the benefits that the scheme brings forward.
- x) The loss of resident's car parking is in part subject to separate negotiations between LBC as the leaseholder and NCP. Overall, the loss of car parking at the site is supported as the site benefits from a Public Transport Accessibility Level (PTAL) of 6b, which is the highest achievable level, and is in convenient walking distance to a range of amenities. Notably, 2 x accessible parking bays and 1 x accessible bay would be delivered for the NCP and residential car parking respectively.
- xi) The proposal would bring substantial benefits in terms of delivering increased employment and increased hotel accommodation to support the local economy. A range of other benefits and contributions to Camden would also be secured through a Section 106 Legal Agreement.
- xii) On the balance of all material planning considerations, the proposals are acceptable in planning terms, and it is therefore recommended that planning permission and listed building consent be granted.

OFFICER REPORT

Reason for Referral to Committee:

Major development involving the provision of more than 10 new dwellings or more than 1,000 sqm of non-residential floorspace (Clause 3(i)); and subject to the completion of a legal agreement for matters which the Director of Regeneration and Planning does not have delegated authority (Clause 3(iv)).

1. SITE AND BACKGROUND

Location

- 1.1 The Brunswick Centre was completed in 1972 and comprises an eight-storey building with residential units above a public shopping centre, with a central outdoor plaza. The site also has a two-storey basement car park and a basement level cinema. The site occupies an entire street block and is bounded by Bernard Street to the south, Marchmont Street to the west, Handel Street to the north and Brunswick Square to the east. It is designated as a Central London Neighbourhood Centre. The Brunswick Centre is Grade II listed and the site lies within the Bloomsbury Conservation Area.
- 1.2 The site has a Public Transport Accessibility Level (PTAL) rating of 6b, the highest possible rating. In addition to nearby bus stops, Russell Square Underground Station is located less than a 100m walk to the south-west of the site. Indeed, within a 15-minute walk are the Underground Stations at King's Cross St. Pancras, Euston, Goodge Street, and Holborn.
- 1.3 The character of the surrounding area is predominantly commercial use containing a mix of office, retail, cafes, and restaurant uses, in addition to some residential uses. The surrounding area has a diverse townscape, characterised by the varied scale, height, age, form and design of the building and street.

2. THE PROPOSAL

- 2.1 The Brunswick Centre was completed in 1972 and comprises an eight-storey building with residential units above a public shopping centre, with a central outdoor plaza. The site also has a two-storey basement car park and a basement level cinema. The site occupies an entire street block and is bounded by Bernard Street to the south, Marchmont Street to the west, Handel Street to the north and Brunswick Square to the east. It is designated as a Central London Neighbourhood Centre. The Brunswick Centre is Grade II listed and the site lies within the Bloomsbury Conservation Area.

- 2.2 The proposal is for the creation of an underground hotel within part of an underutilised two-storey car park beneath The Brunswick Centre.
- 2.3 The proposed underground hotel would comprise 207 guest bedrooms, in addition to a reception area and ancillary food and beverage (F&B) area. The majority of the function, and floor area, of the proposed hotel will be located at basement level, with an ancillary entrance at ground floor level, and associated plant and PV panels located at roof level.
- 2.4 Of the 534 car park spaces located in the existing subterranean car park, approximately 160 car parking spaces will be retained for use by visitors to the Brunswick Centre, including Waitrose visitors, as well as the residents of the Brunswick Centre.
- 2.5 It is anticipated that the proposed hotel will be occupied by Whitbread under their brand of 'Hub by Premier Inn'.

Revision

- 2.6 The proposal has been amended to include the provision of 3 x accessible car parking spaces, where no accessible parking spaces were originally sought to be included.

Slab Lowering

- 2.7 The principal intervention to the existing underground car park in the construction of the hotel, would involve retaining and lowering part of the existing basement slab currently separating the upper and lower basement levels. This basement slab is required to be lowered to deliver the requisite floor to ceiling heights required for the proposed hotel. Once lowered, the upper basement level of the slab will form the proposed hotel, with the lower basement level comprising associated drainage. The basement slab, either side of the proposed hotel, will remain untouched during the process and will maintain existing floor to ceiling heights for the existing car parking.

Hotel Layout

- 2.8 The main function of the hotel will be located at basement level and will comprise the hotel rooms, reception, F&B area, back of house rooms, and some of the associated plant.
- 2.9 An existing ground floor retail unit (Unit 38a; currently Sanrizz) will be repurposed to provide access to the hotel. The lower floor area of the hotel would be accessed by a staircase or either of two proposed lifts. Check in will either be self-service or through the assistance of on-site staff.
- 2.10 The hotel guest rooms would be served by Circadian lighting technology. Further details of this is outlined in the 'Standard of accommodation' section of this report below.

Cycle parking

- 2.11 The proposal would provide 11 long-stay cycle parking spaces, 5 no. short-stay external cycle parking spaces, and 20 x residents cycle parking spaces. Further details are outlined in the 'Transportation' section of this report below.

Car Parking

- 2.12 The Site currently comprises 257 car parking spaces at upper basement level and 277 car parking spaces at lower basement level (534 in total).
- 2.13 Of the subterranean parking, it is proposed to retain approximately 160 spaces not affected by the hotel development to serve visitors to the Brunswick Centre, in addition to residents. 2 x accessible parking bays and 1 x accessible bay would be delivered for the NCP and residential car parking respectively.
- 2.14 The applicant is undertaking ongoing work in respect to the reallocation of the retained car parking spaces to ensure that visitors to the Brunswick Centre, as well as existing residents continue to have their parking needs met. This involves negotiating with the Council's Housing Department regarding the resident parking.
- 2.15 Taxi pick-up and drop-off is proposed to be accommodated within the existing taxi rank on Coram Street nearby to the site.
- 2.16 The hotel would not accept any coach parties.

Delivery and Servicing

- 2.17 All delivery and servicing activity for the proposed hotel will be accommodated on-site within the basement level service yard, with vehicles entering the site via the existing access routes to basement level.
- 2.18 Full details of deliveries and servicing area outlined in the applicant's Delivery and Servicing Plan to be secured as part of the Section 106 Agreement accompanying any grant of permission.

3. RELEVANT HISTORY

The site

- 3.1 **2022/4142/PRE** – Change of use of part of existing subterranean carpark and 1 ground floor retail unit to create a c.210-bed hotel with ancillary food and beverage and back of house facilities (c. 5,000sqm), including

demolition and rebuild of basement floor slab. **Pre-application advice issued 22/03/2023**

- 3.2 **Appeal ref. APP/X5210/W/21/3277179** against the non-determination of Certificate of Lawfulness (Existing Use) application ref. 2020/3988/P for 'Application to certify that the existing use of the Brunswick Shopping Centre within Class E and without compliance with Condition 3 of Planning Permission: PSX0104561 is lawful' – **Appeal dismissed 27/07/2022.**
- 3.3 **PSX0104561** – 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 – **Planning permission granted 01/09/2003**

The area

Quick Parking Car Park, 112A Great Russell Street, London, WC1B 3NP

- 3.4 **Appeal Ref: APP/X5210/W/16/3147078** following refusal of planning application ref. 2015/3605/P for a 166 guest room underground hotel – **Appeal allowed 04/11/2016**
- 3.5 **2022/5446/P** – Variation of conditions 2 (approved plans), 3 (air quality), 6 (cycle storage), 9 (noise), 10 (drainage) and 14 (hotel bedroom number) together with submission of details in discharge of condition 12 (electrical plant in basement), of planning permission ref: 2015/3605/P allowed at appeal ref: APP/X5210/W/16/3147078 dated 04/10/2016, as amended by 2020/1438/P dated 01/06/2020, for 'Change of use of part ground floor and basement levels -4 and -5 from Car Park (sui generis) to hotel (Class C1), including alterations to openings, walls and fascia on ground floor elevations on Great Russell Street and Adeline Place', namely to: increase the number of hotel bedrooms from 166 to 187 with associated internal and external alterations on ground floor elevations on Great Russell Street and Adeline Place – **Granted subject to a S106 Deed of Variation 19/04/2023.**

4. CONSULTATION

Statutory consultees

Historic England

4.1 No comments.

Thames Water

4.2 No objection subject to conditions being imposed on the planning permission.

Waste

Thames Water have requested that the scheme incorporates protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Thames Water expects the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer.

Officer response:

The proposals for the below ground drainage include pumps to protect the property from sewer surcharge.

The basement is existing, there are no changes proposed to the basement box, therefore no changes to groundwater are anticipated.

Water supply:

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of the proposed development. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available. Thames Water have therefore requested a condition be attached to the permission restricting development being occupied until confirmation has been provided that either; all water network upgrades required to accommodate the additional demand to serve the development have been completed, or a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied.

Officer response:

The applicant has agreed to the condition being attached to the planning permission.

Water mains:

- The proposed development is located within 5m of a strategic water main. Thames Water do not permit the building over or construction within 5m, of strategic water mains. Therefore, Thames Water have requested a condition be added to the permission, restricting construction from taking place within 5m of the water main.
- The proposed development is located within 15m of a strategic water main. Therefore, Thames Water have requested a condition be added to the permission, restricting piling from taking place until a method statement has been submitted to and approved in writing by the local planning authority in consultation with Thames Water.

Officer response:

The basement is existing, there are no changes proposed to the basement box, therefore it is not anticipated to limit activities to the existing sewers.

London Underground

- 4.3 No objection in principle, though recommend a condition be attached to the planning permission to resolve potential constraints of the development being situated close to London Underground tunnels and infrastructure.

Officer response:

The applicant's Structural Engineer, HTS, have confirmed that the proposed condition is not required as the footprint and basement of the existing building is not changing in the proposals as all proposed works will take place within the existing building. The proposed structural works include for the cutting of the existing Level B1 RC floor slab at existing column locations and lowering of the floor slab. The lowered slab will be re-supported off dwarf masonry walls onto the existing pad foundations, which already carry the loading of the B1 slab. There will therefore be no change in the dead load of the building nor change in application of the load from the building foundations to the ground. HTS are liaising directly with London Underground to confirm this point.

Metropolitan Police

4.4 No objection in principle, but also have comments and recommendations as follows:

- Main entrance from street level to be security rated.
- The cycle and luggage stores should have security rated doors to protect the items contained within.
- Doors to the publicly accessible food & beverage area be closed and access controlled overnight. Doors to be security rated.
- Hotel guest room doors to be triple certificated for security, fire and smoke, spy holes to be part of the door set up.
- CCTV with complimentary lighting be installed and monitored.

Recommend conditions be attached to the planning permission to mitigate crime prevention matters:

- Prior to construction proof that the plans can achieve secured by design accreditation must be submitted to the design out crime officer and local planning office.
- For the site to achieve a secured by design accreditation to silver award and to maintain this standard through the life of the development.

Officer response:

The applicant has agreed to the above conditions being attached to the planning permission.

It is considered these conditions are sufficient in generally addressing the above Designing out crime recommendations.

Local groups

The Brunswick TRA

4.5 Objection.

1. The proposed roof level alterations would harm the heritage significance of The Brunswick Centre.
2. The proposed sustainable energy improvements would only benefit the hotel and not the existing residential and business uses.
3. The lowering of the basement slab would alter the original design of the building and cause a high level of harm to the special architectural or historic interest and heritage significance of the building.

4. Concerns relating to adverse effects from construction works.
5. Concerns relating to the sufficiency of the acoustic enclosures for plant, and need for noise monitors for the residential flats.
6. Concerns relating to increased air pollution through construction traffic and increased vehicle traffic.
7. Concerns relating to changes to the existing vehicle access and car parking.
8. Concern regarding ventilation for hotel accommodation.
9. Fire safety concerns
10. Concern that the proposed works could exacerbate existing rodent problems at the site.

Officer response:

1. *See section 8 (Design and Heritage)*
2. *Connecting the proposed photovoltaic panels directly to residents' flats is not feasible due to restrictions in parallel connections with the utility network upstream of the meters.*
3. *See section 8 (Design and Heritage)*
4. *See section 10 (Impact on Neighbouring Amenity) and section 12 (Transport).*
5. *See section 10 (Impact on Neighbouring Amenity)*
6. *See section 15 (Air Quality)*
7. *See section 12 (Transport)*
8. *See section 15 (Air Quality)*
9. *A condition would be attached to ensure the development was undertaken in strict accordance with the Fire Safety Strategy submitted by the applicant.*
10. *Council's Environmental Health Officer has raised no concerns with regard to the proposed works exacerbating rodent infestation at the site.*

Bloomsbury Residents' Action Group

4.6 Objection.

1. Construction works will exacerbate existing noise and vibration problems at the site.
2. Changes to the roofline will cause harm to the building's heritage status.
3. Concerns regarding basement level works adversely affecting the building's existing structure.
4. Concerns regarding management of construction traffic, and concerns regarding impact of construction works on businesses at The Brunswick Centre.

5. The existing underground car park could be converted into alternative uses (other than a hotel).
6. There are no public benefits being brought about by the proposal.

Officer response:

1. See section 10 (*Impact on Neighbouring Amenity*)
2. See section 8 (*Design and Heritage*)
3. See section 8 (*Design and Heritage*)
4. Such concerns would be considered within the Construction Management Plan (CMP). Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. Any building works that can be heard at the boundary of the site must be carried out only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. If this is breached, residents are advised to report this to the Council's noise team for investigation.
5. See section 7 (*Land use*)
6. See section 8 (*Design and Heritage*)

The Twentieth Century Society

4.7 No objection in principle, but have concerns as follows:

- The proposal may have a potential for detrimental impact to the building's structure, through the lowering of the floor slab.
- Concerns relating to impacts that the hotel use may have on the building's existing services.

Recommendations as follows:

- All the exposed concrete, including the internal A-frames to the residential areas should be inspected for damage and then repaired as part of any development works.
- Any new repair work needs to be informed by thorough research and investigation and needs to be tested off-site and in a discreet location on-site before it is implemented. Repairs should be durable but also reversible if necessary and an aesthetic match (in texture and colour). A maintenance plan should also be produced.

Officer response:

7. See section 8 (*Design and Heritage*)

Bloomsbury CAAC

4.8 Objection covering the following issue(s):

1. Loss of public car parking
2. Preclusion of possible future PV solar energy cells to address energy efficiency shortcomings of the building.
3. Concerns about the sufficiency of the structural proposals to remove the Level -1 slab.
4. Construction noise and disruption to residents of the upper level flats.
5. Adverse visual effects of the plant enclosures at roof level, which would be visible from residents of the flats at the building, result in clutter and cause harm to the appearance of the listed building.
6. The Brunswick centre is in a poor state of repair and any new proposals should have the rectification of the building condition as a requirement of any planning permissions.

Officer response:

1. See section 12 (Transport)
2. Installation of PV panels are included as part of the proposed works.
3. See section 8 (Design and Heritage)
4. See section 8 (Design and Heritage)
5. See section 10 (Impact on Neighbouring Amenity)
6. See section 8 (Design and Heritage)

Adjoining occupiers

4.9 Thirteen sites notice were displayed as follows:

- 5 x outside entrances on Marchmont St
- 4 x outside entrances on Brunswick Square/Hunster St
- 1 x outside central entrance on Handel St
- 1 x outside central entrance on Bernard St
- 2 x in the centre of the Brunswick Centre

4.10 The notices at the exterior of the Brunswick Centre were displayed on 27/09/2023 until 21/10/2023, and the 2 x notices within the Brunswick Centre were displayed on 27/10/2023 until 20/10/2023 and the application was advertised in the local paper on 05/10/2023 (expiring 29/10/2023).

4.11 Objections were received from at least 65 local households. The objections received by the Council are on the Council's website. The key issues raised are.

Topic

1. Loss of car parking – the car park is well used and provides convenient access to all, particularly disabled persons.
2. Loss of disabled car parking.
3. Loss of on-street car parking.
4. Loss of car parking for residents with existing parking permits.
5. Non-provision of solar PV energy cells – the proposed rooftop plant would remove any future space for future cells being implemented by residents/existing tenants of The Brunswick Centre.
6. Concerns relating to the sufficiency of the structural proposal, specifically the removal of the basement slab.
7. Construction works would cause noise and disruption to residents of The Brunswick Centre.
8. Construction works, namely dust and heavy traffic, causing environmental pollution.
9. Rooftop plant – the proposed plant enclosures would be visible from long views and flats at the site, and cause harm to the appearance of the building.
10. Concern that the solar panels would only service the hotel and not benefit the existing flats.
11. Rooftop plant (noise to existing residents)
12. Rooftop plant (causing damage to the roof)
13. The Brunswick Centre is in a poor state of repair and any new proposal should rectify the building's existing condition.
14. Concern that hotel could be converted to other uses in the future.
15. Concern for standard of hotel accommodation (i.e. no natural light).
16. Need to explore other alternative uses for the existing underground car park.
17. Lack of consultation process and consultation process is unfair to vulnerable tenants.
18. Construction works would disrupt a stream running in or close to the proposed development.
19. Heat from the ventilation shaft and plant will exacerbate existing overheating problems to the existing building.
20. Hotel guests would have access to the existing residents lifts, causing problems.
21. The hotel would not improve sustainable outcomes, and would be entirely dependent on artificial lighting and ventilation.
22. The existing Brunswick Centre walkways are not designed to accommodate a hotel use.
23. The proposal would bring minimal additional benefits for existing businesses.
24. The hotel's operations would exacerbate existing noise issues.
25. The proposal would cause security issues.

Officer response:

1. See section 12 (Transport)
2. See section 12 (Transport)
3. See section 12 (Transport)
4. See section 12 (Transport)
5. See section 11 (Sustainability and Energy)
6. See section 8 (Design and Heritage)
7. *Such concerns would be considered within the Construction Management Plan (CMP). Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. Any building works that can be heard at the boundary of the site must be carried out only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. If this is breached, residents are advised to report this to the Council's noise team for investigation.*
8. See section 15 (Air quality)
9. See section 8 (Design and Heritage)
10. See section 11 (Sustainability and Energy)
11. See section 10 (Impact on neighbouring amenity)
12. See section 8 (Design and Heritage)
13. See section 8 (Design and Heritage)
14. *A condition is proposed (condition 21) restricting the use of the hotel for any other alternative purpose.*
15. See section 9 (Standard of accommodation)
16. See section 7 (Land use)
17. *The consultation has been carried out in accordance with the Council's statement of community involvement. The Council does not control how the applicant chooses to engage with local stakeholders. It is however understood various meetings were held/offered during the application process. Pre-application discussions are confidential, it is at the applicant's discretion whether they choose to engage with local stakeholders at that stage of the development process.*
18. See section 11 (Sustainability and Energy)
19. See section 9 (Standard of accommodation)
20. See section 11 (Sustainability and Energy)
21. See section 7 (Land use)
22. See section 7 (Land use)
23. See section 10 (Impact on neighbouring amenity)
24. See section 7 (Land use)

5. POLICY

National and regional policy and guidance

[National Planning Policy Framework 2023 \(NPPF\)](#)

[National Planning Practice Guidance \(NPPG\)](#)

[London Plan 2021 \(LP\)](#)

[London Plan Guidance](#)

Local policy and guidance

Camden Local Plan (2017) (CLP)

[Policy G1 Delivery and location of growth](#)

[Policy C1 Health and wellbeing](#)

[Policy C2 Community facilities](#)

[Policy C3 Cultural and leisure facilities](#)

[Policy C5 Safety and security](#)

[Policy C6 Access for all](#)

[Policy E1 Economic development](#)

[Policy E2 Employment premises and sites](#)

[Policy E3 Tourism](#)

[Policy A1 Managing the impact of development](#)

[Policy A2 Open space](#)

[Policy A3 Biodiversity](#)

[Policy A4 Noise and vibration](#)

[Policy A5 Basements](#)

[Policy D1 Design](#)

[Policy D2 Heritage](#)

[Policy D3 Shopfronts](#)

[Policy CC1 Climate change mitigation](#)

[Policy CC2 Adapting to climate change](#)

[Policy CC3 Water and flooding](#)

[Policy CC4 Air quality](#)

[Policy CC5 Waste](#)

[Policy TC1 Quantity and location of retail development](#)

[Policy TC2 Camden's centres and other shopping areas](#)

[Policy TC3 Shops outside of centres](#)

[Policy TC4 Town centre uses](#)

[Policy TC5 Small and independent shops](#)

[Policy T1 Prioritising walking, cycling and public transport](#)

[Policy T2 Parking and car-free development](#)

[Policy T3 Transport infrastructure](#)

[Policy T4 Sustainable movement of goods and materials](#)

[Policy DM1 Delivery and monitoring](#)

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

[Access for All CPG - March 2019](#)

[Air Quality - January 2021](#)

[Amenity - January 2021](#)

[Basements - January 2021](#)

[Biodiversity CPG - March 2018](#)

[Community uses, leisure and pubs - January 2021](#)

[Design - January 2021](#)

[Developer Contribution CPG - March 2019](#)

[Employment sites and business premises - January 2021](#)

[Energy efficiency and adaptation - January 2021](#)

[Planning for health and wellbeing - January 2021](#)
[Public open space - January 2021](#)
[Town centres and retail - January 2021](#)
[Transport - January 2021](#)
[Trees CPG - March 2019](#)
[Water and flooding CPG - March 2019](#)

Other guidance:

[Bloomsbury Conservation Area appraisal and management strategy \(2011\)](#)

6. ASSESSMENT

6.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

7	Land use
8	Design and Heritage
9	Standard of Accommodation
10	Impact on Neighbouring Amenity
11	Sustainability and Energy
12	Transport
13	Trees and Landscaping
14	Flood Risk and Drainage
15	Air Quality
16	Refuse and Recycling
17	Fire Safety
18	Employment and Training Opportunities
19	Health Impact
20	Community Infrastructure Levy (CIL)
21	Conclusion
22	Recommendation
23	Legal Comments
24	Conditions Planning Permission
25	Informatives Planning Permission
26	Conditions Listed Building Consent
27	Informatives Listed Building Consent

7. LAND USE

Loss of Car Parking

- 7.1 Policy T2 of the Camden Local Plan states that the Council will support the redevelopment of existing car parks for alternative uses in order to reduce car use and lead to reductions in air pollution and congestion, and to improve the attractiveness of an area for local walking and cycling. The site is located within the Central London Area and is highly accessible in terms of public transport. The existing upper and lower basement levels comprises NCP owned car parking, and is allocated as an NCP operated car park, along with a private residents car park and a Waitrose operated car park (both leased from NCP). The proposals would replace the NCP car park and the majority of residents' parking spaces, with the loss of approximately 370 car parking spaces. The existing Waitrose car park would be retained with at least 160 car parking spaces over the upper and lower basement levels, and some residents' car parking would also be retained at the upper basement level.
- 7.2 The existing NCP and residents' car parks appear to be under-used, and the site is not identified in Camden's Site Allocations Plan as being a car park which supports the functioning of a town centre. As such, the proposed redevelopment of the car park would support sustainable and efficient transport.
- 7.3 However, from a heritage perspective, the existing two-deck car park is an important source of the site's special interest. It embodies developing 1960s thinking about the separation of uses – traffic and consumers – on different levels. Whilst a remnant of the original parking arrangement would be retained to the northern and southern ends, it is considered that significant heritage benefit will need to be demonstrated to justify the harm to the special interest of the building from the change of use of the basement car park and associated alterations. This is discussed further in the 'Design and Heritage' section below.
- 7.4 It should also be noted that the existing car park includes parking spaces for residents of flats within the Brunswick Centre which are leased by Camden Council, and the loss of these car parking spaces is subject to separate negotiation between the owner and the Council.

Loss of Retail

- 7.5 The scheme proposes to utilise the ground floor retail unit 38a as the entrance to the hotel. This unit is situated within the covered passageway leading to the central plaza, close to the Marchmont Street entrance. This would result in the loss of a retail unit (Class E, formerly Class A1) within the Brunswick Centre.

- 7.6 Condition 3 of the 2003 planning permission (ref. PSX0104561) for the refurbishment of the Brunswick Centre (see 'Relevant planning history' section above) permits up to a maximum of 40% of the retail floorspace equating to 3386sqm (excluding the supermarket and eye-catcher unit above the Brunswick Square entrance) to be used within the previous use classes A2 (financial and professional services) and A3 (café/restaurant), in order to safeguard the retail function and character of the Brunswick Centre. A Planning Inspector concluded in an appeal decision in July 2022 (see 'Relevant planning history' section above) that this condition continues to restrict how the site may be used.
- 7.7 Furthermore, Camden Local policy TC2 requires a minimum of 50% of the units within the Brunswick Centre to remain in retail use and that no more than 3 consecutive premises are in non-retail use.
- 7.8 As the proposed hotel use is not a former Class A2 or Class A3 use (instead being a Class C1 use) the conversion of the retail unit into the hotel entrance, would not contravene condition 3 of the 2003 planning permission.
- 7.9 The unit occupied by the proposed hotel entrance would also remain adjacent to existing retail units, therefore not contravening policy TC2.
- 7.10 The retail unit to be converted is also located in one of the side passages of the retail arcade, which would have a lower footfall and has a lesser contribution as an active frontage compared to the units with shopfronts located on the perimeter of the Brunswick Centre or fronting onto the courtyard or main passageways in the Brunswick Centre. Therefore, the loss of the selected retail unit would have a lesser impact in terms of the overall retail function of the Brunswick Centre, relative to many of the other units which are in more prominent and valuable locations.
- 7.11 The loss of the retail unit would also be offset by the significant increase in footfall to be brought about by the proposed underground hotel, in particular through hotel guests who would pass by or otherwise have convenient access to the retail offerings at The Brunswick Centre. The increase in footfall would further support the on-going viability of the retail function of the Brunswick Centre.
- 7.12 It is considered that the loss of one retail unit would be acceptable and would not be detrimental to the character, function, vitality and viability of the Brunswick Centre.

Proposed Hotel Use

- 7.13 In terms of new hotels and visitor accommodation, Policy E3 of the Camden Local Plan recognises the importance of the visitor economy in Camden and states that the Council will support tourism development and visitor

accommodation. New, large-scale tourism development and visitor accommodation is expected to be located in Central London.

- 7.14 The site has a GIA in excess of 5,000sqm and the proposed hotel aims to provide 207 bedrooms. A hotel of this size would be acceptable in this location within the Central London Area.
- 7.15 The principle of a hotel which is entirely subterranean has already been established within Camden, through an appeal allowed at 112A Great Russell Street (appeal ref. APP/X5210/W/16/3147078) for the change of use of part ground floor and basement levels -4 and -5 from car park to hotel (see 'Relevant planning history' section above).
- 7.16 Whilst the site would be easily accessible by public transport, the scheme would not be able to accommodate pickup and set down points for taxis or coach parking, as required by part g) of Policy E3. However, the Transport Assessment and Transport Plan conclude that such trips would be low and that these facilities would therefore be unnecessary. This issue is discussed in further detail in the 'Transport' section below.
- 7.17 The scheme also includes the provision of a food and beverage (F&B) area which would be ancillary to the proposed hotel use. Whilst the proposed level of food and drink provision has not been finalised, it has been confirmed at the pre-application meetings that the intention is for a relatively limited food and beverage offering which will be open to the public throughout the day.
- 7.18 The F&B area is expected to principally be used by hotel guests, being located at basement level and directly accessible from the hotel accommodation. The F&B area would also not be located at street level and not have a visible presence to passing foot traffic, nor would it operate independently from the hotel. The F&B Area is also expected to provide a limited menu and in this respect is unlikely to ever become a destination in its own right. Therefore, the proposed F&B area would not harm the balance and mix of uses within the Brunswick Centre through providing undue competition with the existing established F&B businesses at the centre, and as such the inclusion of the ancillary F&B area is considered acceptable.
- 7.19 The applicant has also submitted a Draft Operational Management Plan which sets out to manage the activities within the development as well as facilitate good relationships with guests, visitors, neighbours and the wider local community whilst also ensuring a pro-active approach to management responsibilities. The parameters of this Management Plan would be reviewed once a year to ensure the operator responds to any changes to regulations and the ongoing management of the development. The Hotel Management Plan would be implemented and monitored by the hotel's General Manager (or Duty Manager).

- 7.20 The Operational Management Plan provides details of the guest arrival/check-in experience, staffing, management of the lower ground floor lounge and bar, access and security, cleaning, maintenance, waste and servicing. The scope and details of the draft Operational Management Plan are considered appropriate in ensuring the safe and efficient operation of the hotel. The Operational Management Plan would be secured as part of the Section 106 Legal Agreement.
- 7.21 Some residents have queried the need for a hotel at the site given the provision of other existing hotels in the area. A Hotel Evidence Statement has been prepared and submitted by Whitbread, the anticipated incoming occupier. 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. As submitted by the applicant, 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). In summary, whilst occupancy levels are not as strong as 2019 levels, they are expected to return to pre-pandemic levels and the applicant considers a hotel in this location will meet current and future demand.
- 7.22 Overall, the principle of the hotel use at the site is acceptable and an assessment of the more specific aspects of the hotel's operation are outlined further in the report.

8. DESIGN AND HERITAGE

Designated and non-designated heritage assets

- 8.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. Section 72 of the same Act sets out that special regard must be given to preserving or enhancing the character and appearance of a conservation area.
- 8.2 The proposal also includes an application for Listed Building Consent for the works to the Brunswick Centre. Section 16 of the Listed Buildings Act requires the local authority, when considering an application for a Listed Building Consent, to have special regard to the desirability of preserving the

building or its setting, or any features of special architectural or historic interest which it possesses.

8.3 Any harm arising to heritage assets should be mitigated as far as possible, for example, through the design and approach of the scheme. Considerable weight and importance must be given to any harm to designated heritage assets, and any harm identified should be outweighed in the balance by considerable public benefits.

8.4 Paragraph 202 of the NPPF states:

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

8.5 There are also non-designated heritage assets in the area which are various unlisted buildings that make a positive contribution to the Bloomsbury Conservation Area.

8.6 Any harm to non-designated heritage asset is a matter of planning balance as set out in paragraph 203 of the NPPF:

203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

8.7 The development plan and the policies of the NPPF make clear that conservation and heritage are important factors that should be given considerable weight in decision making. The design and heritage policies set out in the Camden Local Plan (CLP) (Policy D1 and D2) and London Plan (LP) policy on heritage (Policy HC1) all note the importance of character and appearance. The development plan focuses on the potential impact of new development on the built environment, but also the impact on archaeological remains which may often be unidentified but discovered in the future. Development should avoid harm or minimise harm to designated heritage assets. The policies and NPPF also provide protection to non-designated heritage assets.

Relevant heritage assets

8.8 The Brunswick Centre is the only listed building on the site and is grade II listed. The whole of the site is within the Bloomsbury Conservation Area.

- 8.9 There is one other non-designated heritage asset at the site is a Locally Listed 'Street feature of other structure' described as a 'Boundary Marker-Brunswick Square' located at the pavement immediately to the south-west of the Centre. The proposed works are not considered to impact on this feature given the works do not propose to alter/remove this feature or place any new structures in its immediate vicinity.

Bloomsbury Conservation Area

- 8.10 The site is located within Sub Area 12 (Coram's Fields/Brunswick Centre) of the Bloomsbury Conservation Area. The Bloomsbury Conservation Area and Appraisal and Management Strategy describes how the area is dominated by large-scale, green open spaces of historic significance in and around Coram's Fields. There is a predominance of institutional (hospital, university, education), recreational and community uses with secondary residential and office uses. The area is relatively busy during the daytime as a result of these uses. The Brunswick Centre, in total contrast, is a postwar monolithic concrete megastructure occupying an entire street block on the west side of Brunswick Square.
- 8.11 The Brunswick Centre itself is described as an influential concrete megastructure with a shopping centre and 400 flats on the upper floors, constructed in 1967-72 to the designs of Patrick Hodgkinson and Sir Leslie Martin. It was a precedent for a number of innovative housing estates designed by various architects under Sydney Cook when he was Camden's borough architect. Since its refurbishment by Levitt Bernstein Architects, the shops and restaurants grouped around its central open-air precinct have become a popular focal point.

Impact of proposals

Underground car park – less than substantial harm

- 8.12 While the car park does not display architectural virtues and has limited prominence to the public-realm, it is nonetheless a vital service element and embodies the planning philosophy of its period, relating to the separation of vehicle movement from pedestrian activity. The Brunswick Centre's integrated parking and servicing arrangements, being designed to be underground and separated from the above ground plaza above, is a key feature of the Centre's overall design and significance as a 'megastructure' in which the integration of diverse components – offices, shops, homes, cinema, parking – deviated from earlier and more traditional high streets and housing estates.

- 8.13 The proposal would see the lowering of the upper car park deck, sliding it in sections on jacks down its supporting piloti, to create a double-height space with a service level below.
- 8.14 The proposed lowering of the upper car park deck, through sliding it in sections on jacks down its supporting piloti, would result in a high level of intervention to the existing building, involving a very considerable disturbance of fabric and major loss of plan form in this significant area. Given the extent of fabric disturbed and the scale of change to the original plan form, these works are considered harmful and would affect the traditional function of this subterranean area and its significance to the overall design of the megastructure. The area affected forms a large proportion of the building as a whole and results in a substantial change from an open and utilitarian volume used for parking and servicing to an enclosed, separate hotel.
- 8.15 However, because of the construction technique proposed, whereby the slab is reutilised, the actual loss of fabric is minimised. In addition, the fabric of the basement – comparatively rough concrete of the 20th century, has a moderate significance. In addition, approximately one third of the basement levels would not be altered, and remain as a two-deck car park (although additional access point to the residents' car parking at the upper basement level will need to be created). This will enable future onlookers to understand to some extent the original operation and materiality of the subterranean space, thus overall protecting, its historical and evidential contribution.
- 8.16 Overall, while the works to the basement levels are significant in the scale of change to the original plan form, and consequently impact on the significance of the subterranean parking function, the construction technique utilised would minimise loss of the original building fabric, and a large area of the car park would remain unaltered to still allow for appreciation of the original operation and materiality of the subterranean space. Therefore, harm to this part of the Centre's historical and evidential contribution as a listed building is mitigated.

Rooftop – less than substantial harm

- 8.17 The proposed rooftop interventions involve the installation of solar panels and other plant, to serve the underground hotel.
- 8.18 While the solar panels are likely to be able to be concealed behind the roof's deep parapet and so not be visible from the ground, it is likely some tall plant will be visible around the "chimneys" at roof level.

- 8.19 These rooftop works would therefore result in a degree of visible change to the high-level form of the building. However, it is considered that the proposed alterations to the roof will have a minor effect on a building of this scale and robustness. In particular, the existing roof line is not entirely free of interruption, and there are already elements of existing plant visible.
- 8.20 Overall, the rooftop solar panel and plant intervention, while changing the external appearance of the building, would result in less than substantial harm to the listed building and to the Bloomsbury Conservation Area. This is principally due to; the limited overall intervention to the roofscape noting the large scale of the roof relative to area of plant and solar panels proposed, the rooftop already being characterised by existing plant, the equipment being positioned in areas of existing plant, and limited visibility of the plant from public areas.

Shopfront – less than substantial harm

- 8.21 The hotel's reception arrangements are proposed to occupy a shop unit in the northern pedestrian arcade. An opening in the ground floor slab would be created to form a double-height space through to the basement, allowing access (via a lift and staircase) and visibility.
- 8.22 While the internal arrangements of individual shop units at this site do not generally interfere with the special interest of the building, the creation of a connection between levels is a significant intervention and cause a loss of fabric and harm to plan form. This element would create a separate access to the basement from a retail shop, where no other such examples exist for other retail units in the Brunswick Centre.
- 8.23 The works would cause loss of fabric and harm to plan form, allowing a view into the basement that was not previously possible and not intended by the original architect.
- 8.24 There are no mitigating factors for the intervention of the opening at ground floor to the basement level, however these works are limited to affecting only one of the many retail units at the Centre, and it is acknowledged that these works are required to create suitable access from the ground floor to the hotel accommodation below.

Additional heritage benefits

- 8.25 In order to balance the heritage harms outlined above, the applicant has proposed to implement a programme of heritage benefits intended to

conserve other parts of the Brunswick Centre (outside of the basement area), which would be secured by a Section 106 legal agreement.

- 8.26 This programme is informed by a Heritage Condition Survey of the Brunswick Centre's most significant elevations and structural components, commissioned by the applicant to identify its current condition and required repair works.
- 8.27 The Survey has identified hundreds of instances of cracking, spalling, impact damage, poorly executed or inappropriate previous repairs, redundant fixing holes, redundant fittings, out-of-plumbness, areas of missing concrete, failed mastic joints, calcium deposits, salts deposits, failed or damaged coatings and finishes, unauthorised painting of concrete, cracking of render, missing mortar, algae staining, pyrites and rust staining, graffiti, dirt and vegetation growth.
- 8.28 This programme takes the form of a large number of important repairs, which will greatly alleviate the parlous condition of the building's exterior fabric. The repairs are detailed in type and location in the Heritage Offer document
- 8.29 Specifically, the improvement works include remediating the perimeter concrete plinth vents at ground level as well as the full height structure above and around the cinema opening fronting onto Brunswick Square, comprising approximately 250 individual repairs. The concrete plinth vents ventilate the underground car park and are therefore directly connected to the area affected by the proposed underground hotel. The repair works also relate to building fabric located at ground floor level at the building's side elevations and highly visible from the public-realm. .
- 8.30 The repair works would be secured by condition as well as through the Section 106 Legal Agreement.

Conclusion

- 8.31 Less than substantial harm has been identified to several designated heritage assets, as set out above. The impact on these assets has been minimised and mitigated by limiting the extent of building fabric to be removed internally, limiting the scope of intervention at roof level to ensure the proposed plant are placed in the least sensitive locations on the building roof, and overall limiting the extent of visible change to the external appearance of the building. Considered cumulatively, and taking account of the heritage benefits of the scheme, there is still a net harm to the assets listed. The harm is less than substantial.
- 8.32 In accordance with paragraph 202 of the NPPF, where a development will lead to 'less than substantial harm', the harm should be weighed against the

public benefits of the proposal, including securing its optimum viable use. In carrying out this balance, in accordance with the statutory requirements, considerable weight and importance should be attached to harm to designated assets.

- 8.33 Officers consider that the public benefits of the scheme, principally the repair works to the Brunswick Centre to be delivered through the scheme, in addition to local workforce employment opportunities both during construction and post construction (detailed elsewhere in this report) and other contributions sought as part of the section 106 legal agreement, are, in principle, sufficient to outweigh the temporary harm identified to the heritage assets.

9. STANDARD OF ACCOMMODATION

- 9.1 An important objective of the NPPF (Paragraph 130), the London Plan, and the Camden Plan (Policy A1) is to seek to secure a good standard of amenity for all future occupants of buildings.
- 9.2 There is no specific planning policy or guidance that sets out standards of amenity for hotel accommodation. Camden Policy A1 only refers to development being to the comfort of the short stay occupants. Camden Planning Guidance on 'Amenity' refers to the BRE 'Site Layout Planning for Daylight and Sunlight' (Oct 2011) which is generally applied to residential (Class C3) situations only.
- 9.3 The principle of the acceptability of underground hotel rooms without windows has been established by way of the appeal decision for the underground hotel at 112A Great Russell Street. The inspector found that while it was a legitimate point of view that underground hotel rooms without windows are in principle an unsuitable way of accommodating visitors, this does not find support in planning policy or guidance. Visitors to London have a wide choice of hotel accommodation, and some people would choose to not sleep in a room without a window, while others may decide that the benefits of a highly accessible location, close to numerous visitor attractions, would outweigh the absence of a window. Notwithstanding, Circadian Lighting is proposed within the lightwells between the proposed hotel rooms which utilises daylight replication technology to provide a natural spectrum of light from dawn until dusk following the human Circadian rhythm.
- 9.4 Typical room layouts have been provided. Whilst the rooms would be compact, they would be suitable for short term use by visitors.
- 9.5 The standard of accommodation in terms of guest comfort and facilities are therefore considered to be addressed.

Noise and vibration

Noise ingress from transportation sources

- 9.6 Re-radiated noise levels from underground trains were shown to be more than the hotel operator's performance standard. The initial design has, therefore, included provision for the hotel guestrooms to be constructed on an isolated concrete slab, with internal walls and ceilings isolated from the core building structure.

Noise transmission from Curzon Cinema

- 9.7 Except for the cinema, there are no adjacent retail uses that would be expected to generate significant levels of noise or vibration. The acoustic report states that no noise from film soundtracks could be heard nor measured on the concrete wall, over the existing background levels. The proposed guestrooms adjacent to the cinema demise will be fully isolated from the building structure, including the already substantial separating structure.
- 9.8 The Council's Environmental Health Noise Pollution Officer has recommended that an informative be added to the decision to recommend that hotel bedrooms are designed and located such that unoccupied noise levels do not exceed the criteria specified in Table H.1 Airborne Sound Insulation and Table H.3 Indoor ambient noise level ranges for hotel bedrooms of BS8233:2014.

Daylight and sunlight

- 9.9 There are no standards for sunlight and daylight to hotel accommodation. Notwithstanding, the proposed underground hotel is provided with appropriate lighting to provide adequate comfort for the hotel guests.
- 9.10 The underground hotel would utilise Circadian Lighting within lightwells adjacent to the bedrooms, which will mimic natural light cycles in line with natural Circadian rhythms.
- 9.11 The Circadian Lighting would provide similar lux levels to hotel bedrooms served by natural daylight, and ensure the guest rooms are served with appropriate lighting.

Outlook and privacy

- 9.12 The hotel rooms windows which face into the lightwells, would be angled so they do not face directly into one another. Privacy screens included between window will be fitted in some locations to prevent overlooking.
- 9.13 These design measures mean that a reasonable sense of outlook and privacy can be maintained.

Accessibility

- 9.14 Building Regulations require at least 5% of new hotel rooms to be wheelchair accessible. The proposal would meet this requirement through providing at least 10 wheelchair accessible rooms. Access to the hotel guest rooms would also be 'step free' with a lift providing access for wheelchairs etc between the ground floor reception and upper basement floor.
- 9.15 A condition would be attached for at least 10 (5%) of the guest rooms to be fully wheelchair accessible (condition 20).

Conclusion

- 9.16 The proposed underground hotel is considered acceptable in terms of aspect, outlook, noise, light, and amenity space and would provide an acceptable level of amenity. It would provide accessible hotel guest rooms for all, including provision of wheelchair accessible guest rooms, allowing the buildings to provide an adequate standard of short-stay accommodation that can be used safely, easily and with dignity.

10.IMPACT ON NEIGHBOURING AMENITY

- 10.1 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impact from construction works are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of current and proposed occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.
- 10.2 Given the hotel would be located almost entirely underground and no additional bulk to the building is proposed, the proposal would not cause a loss of sunlight/daylight or visual privacy to surrounding properties.
- 10.3 Some residents of the Brunswick Centre have raised concerns regarding heat transmission through the introduction of the hotel use. The proposed hotel would 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.
- 10.4 Some residents have also raised concerns regarding the impact of the proposals on their security.
- 10.5 The security of both hotel guests and residents has been a key consideration through the design development stage and the proposals

were discussed with Camden's Designing Out Crime Officer prior to submission of the application.

- 10.6 In terms of its day to day operations, the hotel will be publicly accessible between the hours of 7am and 11pm after which 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. The F&B area will be publicly accessible during the hotel opening hours. However, access to the hotel room corridor and bedrooms will always be restricted to guests with a key card.
- 10.7 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.
- 10.8 In addition, a condition would be secured requiring that prior to above ground works, evidence that the proposed hotel can achieve secured by design accreditation to Silver Award be submitted to and approved in writing (in consultation with the Designing Out Crime Officer) by the local planning authority (condition 12). The condition would also require design accreditation be maintained for the duration of the life of the development.

Noise impacts

Noise impact from building services/mechanical plant operation

- 10.9 The proposal includes the installation of Air Source Heat Pumps (ASHPs) and other plant on the roof of the Brunswick Centre.
- 10.10 A Plant Noise Assessment in line with BS 4142 has identified the maximum acceptable noise levels which may be emitted by the proposed plant equipment during both the daytime and night-time periods. With the mitigation measures specified in Table 8.2 of the report, the noise levels identified should ensure that the likelihood of an adverse impact is low.
- 10.11 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.

- 10.12 Rooftop plant would also be enclosed within an acoustic enclosure in line with the existing ventilation towers, further mitigating noise emissions.
- 10.13 The Council's Environmental Health Noise Pollution Officer has reviewed the submitted Plant Noise Assessment and has confirmed that the proposals are considered acceptable in their impact with regards to noise and vibration, subject to compliance with condition 16 to install anti-vibration measures and condition 17 to ensure the cumulative sound level from building services and fixed plant is 10dB(A), and by 15dB(A) where the source is tonal, at the nearest residential receptor. It is considered that these conditions would ensure that the amenity of neighbouring residents is protected in terms of noise and vibration from the proposed rooftop plant.

Noise impact from roll cages

- 10.14 Mitigation measures to address the potential noise impact from re-radiated noise from roll cages should be addressed in the finalised Delivery and Servicing Management Plan to be secured in the Section 106 Legal Agreement. Council's Environmental Health Noise Pollution Officer has noted modern low-noise polyurethane wheels should be used in all roll cages.

Noise impact from construction

- 10.15 The noise impact from demolition and construction will be addressed as part of the Construction Management Plan (CMP) which will be secured via a Section 106 Legal Agreement. An initial discussion between the Council's Environmental Health Noise Pollution Officer and the project acoustic consultant has confirmed that standard mitigation measures will not suffice due to the structural characteristics of the Brunswick Centre. The following measures have been discussed as part of the early CMP engagement process:

- Bespoke quiet periods (in consultation with Curzon, Waitrose and residents) for high-impact works.
- Acoustic trials (in advance of the start of the demolition works) to establish the best demolition methodology.
- Avoiding the use of percussive breakers, favouring the use of low-impact demolition technologies.
- Isolating the demolition area so that noise does not travel through the building.

Structural impacts

- 10.16 A Structural Report has been submitted, which assesses the proposed structural works in the areas of the central basement car park at upper and lower basement levels, the existing retail unit proposed as the hotel entrance, and localised areas of roof where plant is to be located.

- 10.17 The Structural Report has been reviewed by the Council's Structures Manager who considers the report identifies the structural support works where necessary.
- 10.18 Overall, it is considered that the works will not have an impact on the structural stability of the building.

11. SUSTAINABILITY AND ENERGY

- 11.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.
- 11.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.
- 11.3 Local Plan policy CC2 expects non-residential development arising from conversion, extension or change of use, to meet BREEAM Excellent.

Sustainability (BREEAM)

- 11.4 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2) and major developments should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen)

As this is a major application, an Energy and Sustainability Statement was submitted by the Applicant. This was assessed by the Council's Sustainability Officer. All main targets are met and exceeded in accordance with Policies CC1 and CC2 of the Camden Local Plan 2017. Planning requirements for the proposed non-domestic development is an Excellent BREEAM rating (with a minimum of 70% required for an 'Excellent' rating). The proposal reviewed currently achieves a score of 85.45%, which equates

to an 'Outstanding' rating.

Table 3.1 Summary of BREEAM Category Scores

BREEAM category	Credits available	Credits targeted	Weighting (%)	Category score (%)
Management	20	20	14.92%	14.92%
Health & Wellbeing	20	11	17.80%	9.79%
Energy	24	23	18.04%	17.29%
Transport	11	11	9.57%	9.57%
Water	8	7	6.96%	6.09%
Materials	13	12	16.32%	15.06%
Waste	9	7	7.34%	5.71%
Pollution	9	5	9.04%	5.02%
Innovation	10	2	10.00%	2.00%
TOTAL				85.45%
TARGETED RATING				OUTSTANDING

Figure 1 – Summary of BREEAM Category Scores (source: applicant's Energy Statement prepared by Greengage)

Energy (CO2 reduction beyond Part L 2013)

- 11.5 The energy strategy for the scheme is detailed in the Energy Statement report issued by Greengage in July 2023. As shown in Table 1 (below), the underground hotel will reduce emissions by 36% when compared to the Part L 2021 baseline, and the proposed energy efficiency measures will reduce emissions by a further 9% as described in the 'Be Lean results' section.
- 11.6 Therefore, the scheme meets and exceeds the target of overall 35% carbon reduction over Part L building Regulations as set out in the London Plan Policy SI2. The scheme also meets and exceeds Policy CC3 requirements from the Camden Local Plan 2017.
- 11.7 The above targets will be secured via S106 legal agreement through an Energy and renewables plan and a Sustainability plan (BREEAM compliance).

Energy and carbon summary

- 11.8 The following summary table shows how the proposal performs against the policy targets for carbon reductions in major schemes, set out in the London Plan and Camden Local Plan.

Policy requirement (on site)	Min policy target	Proposal reductions
Total carbon reduction: LP policy SI2 and LP CC1	35%	36%
Be lean stage (low demand): LP policy SI2	15%	9%
Be green stage (renewables): CLP policy CC1	20%	27%

Table 1 - Carbon saving targets and the scheme results

Total carbon reductions

- 11.9 Reductions are measured against a baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021). The remainder of the carbon savings to 100% reduction (zero carbon) should then be secured through a carbon off-set payment. This is charged at £95/tonne CO₂/yr (over a 30 year period) which is spent on delivery of carbon reduction measures in the borough.
- 11.10 Residential development should be exceeding the target now, so GLA guidance has introduced a more challenging aspirational target of 50% on-site total savings that residential development should aim to achieve.
- 11.11 In this case, the development exceeds the policy target of 35% reductions, achieving an overall on-site reduction of 36% below Part L requirements as shown in Table 1 above. A **carbon offset of £110,301 will be secured by Section 106 legal agreement** to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand) -

- 11.12 London Plan policy SI 2 sets a policy target of at least 15% reduction of carbon emissions beyond the Building Regulations baseline through reduced energy demand at the first stage of the energy hierarchy.
- 11.13 In this case, the development does not meet the policy target of 15%, reducing emissions by 9% at this stage. However, domestic hot water accounts for most of the proposals energy demands and the proposed improvements do not directly impact this demand. This results in limited potential to reduce carbon emissions for this type of development where domestic hot water demand has such a significant impact on energy performance. If the domestic hot water consumption is excluded from the calculation, the emissions savings obtained in the rest of the energy uses from the efficiency measures, including measures such as energy efficient lighting and ventilation, at the Be lean stage, would be 25%. The applicant has also demonstrated that Waste Water Heat Recovery would not be suitable for the development. However, the Council's Sustainability Officer

considers the shortfall in achieving the targeted reduction of 15% to be acceptable.

Be clean stage (decentralised energy supply)

- 11.14 London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.
- 11.15 In this case an assessment of the existing London heat map has been made and demonstrated that there are no existing local networks present within connectable range of the scheme. Instead, a series of VRF systems are proposed to provide space heating and cooling to the proposed underground hotel, as well as a central ASHP system for hot water generation.

Be green stage (renewables)

- 11.16 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.
- 11.17 In this case, the development exceeds the policy target of 20%, reducing emissions by 27% at this stage through renewables, in compliance with the development plan. The proposal includes PV panels on the roof with full details secured by condition 9. The proposal includes low carbon heating like Air Source Heat Pumps (ASHPs) which are proposed on the roof of the building.

Be seen (energy monitoring)

- 11.18 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting. The proposal includes sub-metering to enable post construction monitoring. Additionally, the 'Be Seen' methodology has been used to report on the predicted Energy Use Intensity and space heating demand of the proposed hotel.

Climate change adaption and sustainable design

- 11.19 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent. The proposal would exceed the standard, achieving a BREEAM Outstanding rating (category score of 85.45%).

- 11.20 The proposal includes the incorporation of water efficient design measures to minimise overall water consumption on site. In addition, greywater harvesting system is to be installed and used for WC flushing by collecting water from showers, thereby reducing water demand.
- 11.21 Dynamic thermal modelling has been submitted by the applicant, as part of the justification for proposing active cooling. Council's Sustainability Officer has reviewed the modelling and considers that due to the nature of the hotel being located almost entirely underground, and taking into account the results of the modelling, it is accepted that active cooling is necessary on this site in order to meet the TM52 Thermal Comfort criteria.
- 11.22 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SUDS) and water efficiency measures.
- 11.23 In this case, the development cannot implement SUDS and blue roofs due to the structural constraints of the existing roof. Flood risk is covered in the 'Flood risk and drainage' section of this report.

Summary

- 11.24 The proposal satisfies policy objectives by optimising sustainability through the incorporation of best practice design, construction, and operation measures. Based on the above, it is considered the proposals accord policy and guidance in respect of sustainability matters and is therefore acceptable in terms of sustainability.

12. TRANSPORT

Car free

- 12.1 Policy T2 seeks to limit the availability of parking and require all new developments in the borough to be car-free.
- 12.2 In this respect the new underground hotel would be secured as car-free by means of a section 106 legal agreement, restricting the hotel from obtaining any on-street or on-site parking permits in connection with the development.
- 12.3 It is noted that some displaced car parking spaces would be re-provided as part of the construction works, however there would be a substantial reduction in the overall amount of car parking on site.

Cycle parking

- 12.4 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, London Plan Policy T5 (1 space per 20 bedrooms long-stay and 1 space per 50 bedrooms short-stay), CPG Transport, and the London Cycling Design Standards (LCDS).
- 12.5 11 covered and secure long-stay cycle parking spaces and 5 secure short-stay cycle parking spaces would be provided in accordance with the London Plan standards, which require 1 x long-stay cycle space per 20 bedrooms, and 1 x short-stay cycle space per 50 bedrooms.
- 12.6 The long-stay cycle parking would be provided within a dedicated internal cycle store which comprises 1 x accessible cycle space and 10 standard spaces within a two-tiered arrangement. Access would be via a suitably sized internal lift in accordance with the London Cycling Design Standards.
- 12.7 The short-stay cycle parking would be located externally, close to the hotel entrance.
- 12.8 This would take the form of 3 x Sheffield style stands able to accommodate 6 bicycles.
- 12.9 The cycle parking proposals are deemed to be Local Plan Policy T1 and London Plan Policy T5 compliant.

Highways works

- 12.10 The proposal would not require any physical alterations to the public highway, and it is felt that a highways contribution is not required on this occasion.

Managing and mitigating the impacts of construction

- 12.11 The Council needs to ensure that the development can be implemented by mitigating impact on amenity and ensuring the safe and efficient operation of the highway network in the local area. A detailed CMP would therefore be secured via a s106 planning obligation if planning permission is granted. A CMP implementation support contribution of £29,943 would be secured via a s106 planning obligation if planning permission were granted. A construction impact bond (£31,497) would also be required. The bond is fully refundable on completion of works, with a charge only being taken where contractors fail to take reasonable actions to remediate issues upon notice by the Council.

Impact on local transport infrastructure

- 12.12 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.

- 12.13 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. Implementation of the Travel Plan and associated monitoring and measures would be secured through the Section 106 Legal Agreement.
- 12.14 In addition, the applicant has proposed to make contributions to secure improvements to local transport infrastructure in proximity to the site and which may be used by or affected by and hotel guests and staff in trips to/from the hotel. These take the form of contributions to; an electric vehicle charging point and bay, cycle improvements on Guilford Street, pedestrian improvement works (to be delivered as part of the Holborn Liveable Neighbourhood project), environmental improvements to the northbound cycle contraflow on a section of Marchmont Street, bus improvements to Woburn Place, and extension of existing dockless cycle bay on Bernard Street. These transport improvements which the site is located in proximity to and hotel guests may access in trips to/from the hotel. Additionally, the applicant would provide cycle facilities at the site for residents of the Brunswick Centre, in the form of delivering 20 x cycle spaces.
- 12.15 These contributions and the residents cycle parking would be secured through the section 106 legal agreement.

Summary

- 12.16 Overall, the proposal is acceptable in terms of transport implications, being car-free and located in a highly sustainable and accessible location in line with planning policy. The existing public highway network has sufficient provision for ancillary transport requirements including taxi pick-up and drop-off. Sufficient provision is made for disabled car parking within the re-provided NCP and residents parking in the Brunswick Centre. The proposal will not generate a significant level of vehicular traffic and as such, would not have a significant impact on the capacity of the surrounding highway network. Conveniently accessible long-stay and short-stay cycle parking would be provided.

13. TREES AND LANDSCAPING

- 13.1 The scheme involves development beneath tree pits within the central courtyard of the Brunswick Centre. No trees are proposed for removal or pruning in order to facilitate development. The Council's Tree and

Landscape Officer has reviewed the submitted arboricultural method statement and confirmed that the existing onsite courtyard trees will not be adversely impacted by the development and no physical tree protection measures are required.

14. FLOOD RISK AND DRAINAGE

- 14.1 A Flood Risk Assessment has been submitted in support of the application.
- 14.2 The Flood Risk Assessment identifies that the Site is located within Flood Zone 1 with low flood risk from all uses.
- 14.3 The National Planning Policy Framework identifies hotels as a 'more vulnerable' land use in flooding terms. However, in accordance with the NPPF table of Flood Risk Vulnerability and Flood Zone Compatibility, it is appropriate to locate new hotels within Flood Zone 1.
- 14.4 The Flood Risk Assessment identifies a small part of the central area of the Site to be at low to medium risk of flooding from surface water. However, as the Proposed Development is located within the basement levels of the building, and given the remaining building footprint is at low risk of flooding from surface water, HTS consider the risk of surface water flooding to be low.
- 14.5 The Flood Risk Assessment identifies that the Site is partially located within an area of Increased Susceptibility to Elevated Groundwater. Having reviewed historic groundwater flood incidents, neither the Site, nor areas around the Site, have any record of groundwater flooding. HTS consequently consider the risk of flooding from groundwater to be low.
- 14.6 With regard to drainage, the underground hotel would utilise the site's existing drainage strategy, with new foul water drainage provision to serve the new hotel rooms and F&B area at the lower ground floor. New pumping stations are to be formed below the existing slab, with storage included in the void space below the slab.

SUDS

- 14.7 No rainwater harvesting would be incorporated into the proposals, however this is considered appropriate due to there being minimal works proposed above ground level. As such, the existing rainwater gravity network would be utilised.
- 14.8 Throughout the pre-application discussions, it was agreed that changes externally to alter drainage and introduce SuDs at the site are not feasible

due to the listed nature of the building, drainage layout and limited scope of works outside the basement level.

- 14.9 Greywater harvesting is however proposed to be incorporated into the scheme which will provide sufficient daily water for flushing toilets in all hotel rooms.
- 14.10 Council's Sustainability Officer has reviewed the proposal and supports the introduction of greywater harvesting within the hotel. The greywater harvesting would be managed and maintained by the proposed underground hotel operator. Full details of the greywater harvesting would be secured by a condition of consent (condition 11).
- 14.11 Thames Water have also been consulted and the applicant has adequately responded to their queries in respect to sewage flooding, groundwater, and other impacts on Thames Water assets. A condition (condition 7) would be secured to ensure necessary network upgrades and agree a development and infrastructure phasing plan with Thames Water, prior to the occupation of the development.

15. AIR QUALITY

- 15.1 The proposals are located in an area of poor air quality, especially at the frontages onto Bernard and Hunter Street:

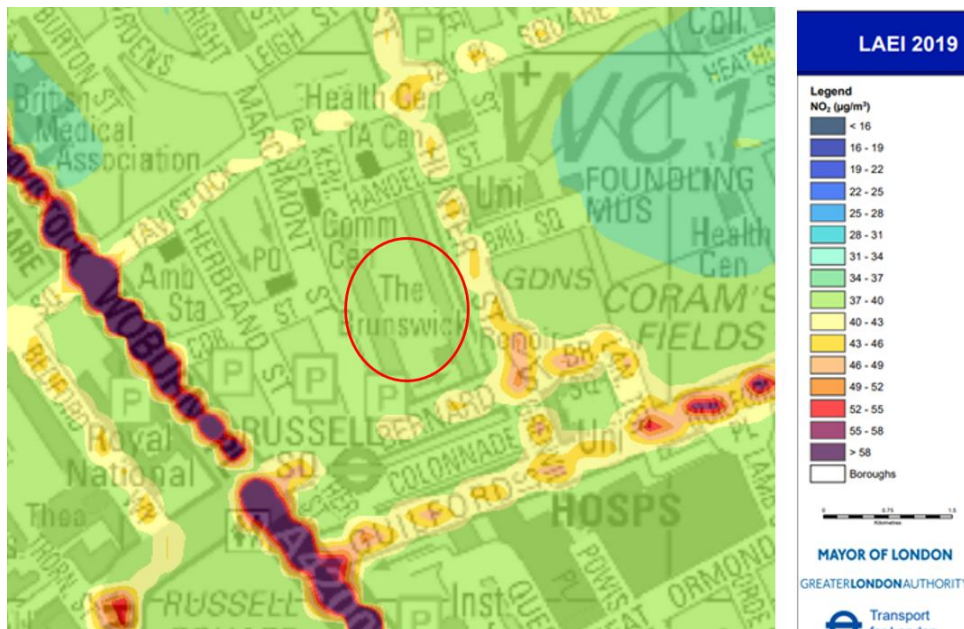


Figure 2: London Atmospheric Emissions Inventory air pollution map (source, Greater London Authority)

Operational impact of development on local area

- 15.2 The proposal is for heating through a non-combustion Air Source Heat Pump which is welcomed in this area of poor air quality. The applicant also notes that an emergency generator will be installed sized to life safety functions, at a size of <1MWth and will be tested for <50 Hours per year, the generator exhaust will be at roof level away from residential receptors. The applicant should further ensure it is away from any other air intakes.
- 15.3 A diesel generator (for emergency use only) is proposed but details are not yet finalised. A condition (condition 13) would be attached to the planning permission, requiring details of the diesel generator to be submitted and approved in writing by the local planning authority, prior to the commencement of construction other than implementation of the basement level works.

Air Quality Neutral Assessment

- 15.4 The building currently passes the AQ Neutral assessment for transport and building emissions. There is no dedicated on-site parking and the impact on traffic activity is expected to be small and therefore the transport emissions are considered to be air quality neutral. It is also noted that the development will replace what is currently a car park which will more broadly discourage car trips into central London. The building also passes the AQ neutral assessment for operational impacts as it is reliant on an electric heat pump solution for heating & hot water.

Operational impact on occupants

- 15.5 A desk study of NO₂ and PM concentrations has been undertaken for the proposed development. This predicts that at the SE and SW boundaries of the site there will be exceedances of UK National Air Quality objectives for NO₂ at between 41.7 and 42.0µg/m³ respectively. However, the air intake location is away from the road with concentration at ground level predicted as 38.0µg/m³, additionally the air intake is at a height of 10m meaning there will be greater dispersion at this height. In addition PM₁₀ & PM_{2.5} is modelled to exceed WHO air quality guidelines at most modelled receptors. As this is a hotel it is not anticipated to have the same sensitivity as residential use.
- 15.6 Note: NO_x filtration will not be fitted to the mechanical ventilation as this will increase the operational energy usage. Air inlets should be located as far as possible from roads, heating flues or other sources of air pollution.
- 15.7 With regard to mechanical ventilation, indicative details have been provided showing the location of fresh air intakes at low level and the generator exhaust at roof level. These details are considered acceptable in principle by Council's Sustainability Officer. A condition (condition 14) would be attached, requiring full details of mechanical ventilation to be submitted to and

approved in writing by the local planning authority, prior to the commencement of development.

Construction impacts risk assessment

- 15.8 Note: There has been some discussion about potential exacerbated risks to construction workers undertaking works such as cutting the concrete slab in the confined basement. These risks have been addressed by mitigation measures outlined in the 'Site specific mitigation' of the applicant's Air Quality Assessment report, further details should also be brought forward as part of a construction management plan.
- 15.9 It is concluded that the overall risk is "Medium Risk with regards to dust soiling", with highly sensitive receptors including residential properties within 20m of the site boundary. Developments which fall into a medium risk category would be required to install air quality monitoring. This is not addressed in the mitigation measures outlined.
- 15.10 While dust monitoring would usually be required for a development of this scale, as the majority of the demolition and construction works would occur underground, it is not necessary for real-time air quality monitoring to be implemented during the construction works. An informative would also be attached to the permission, outlining that mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.
- 15.11 With regard to air quality effects from non-road mobile machinery (NRMM), a condition would also be attached restricting the use of NRMM at the site, unless it compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).
- 15.12 Overall, it is judged that the proposed development is consistent with Paragraph 180 of the NPPF, being appropriate for its location in terms of its effects on the local air quality environment. It is also consistent with Paragraph 181, as it will not affect compliance with relevant limit values or national objectives. The proposed development is compliant with Camden Council Local Plan as well as with Policy SI1 of the London Plan.

16. REFUSE AND RECYCLING

- 16.1 The London Plan Policy SI 7 sets a target of 95 per cent for recycling/ reuse of construction, excavation and demolition waste. The applicant has significantly reduced construction waste, as well as embodied carbon

(equivalent to a 98% reduction in carbon from materials) by reusing the existing basement slab, in lieu of demolition and avoiding the need for a new floor slab.

Circular economy

- 16.2 The promotion of a more circular economy involves resource conservation, waste reduction and increases in material reuse and recycling and is one of the key new policies in the London Plan 2021 (Policy SI 7 – Reducing waste and supporting the circular economy). To help achieve this, the London Plan requires all referable applications to submit a Circular Economy Statement.
- 16.3 While a specific circular economy assessment has not been undertaken, the whole underground hotel would be contained within an existing space and therefore demonstrates a high level of circularity by making best use of an existing space. During the slab lowering process there will be approximately 125m³ of reinforced concrete that will need to be demolished, the applicant is currently exploring options for reuse of this demolition material into the proposed structure.
- 16.4 The new materials in the fit-out of the hotel have also been designed to follow the six key circular economy principles.
- 16.5 The monitoring, reduction, and recycling of construction waste will be included as part of a waste management strategy as a component of the Construction Management Plan secured by section 106 legal agreement. The minimisation of construction waste will comply with CLP policy CC1, LP policy SI 7, and the relevant guidance.

Commercial waste and recycling

- 16.6 The new materials in the fit-out of the hotel have also been designed to follow the six key circular economy principles.
- 16.7 The hotel would contain a dedicated bin store at hotel bedroom level, which would be located adjacent to the back of house areas.
- 16.8 The bin store would also be adjacent to the Brunswick Centre service road which ensures the transfer distance from the bin store to a collection vehicle is minimised. A shallow gradient ramp connects the bin store to the service road and the collection point is flat.
- 16.9 The bin store location and transfer route (in red) are shown below. The overall route from the bin store to the service road is approximately 10m.

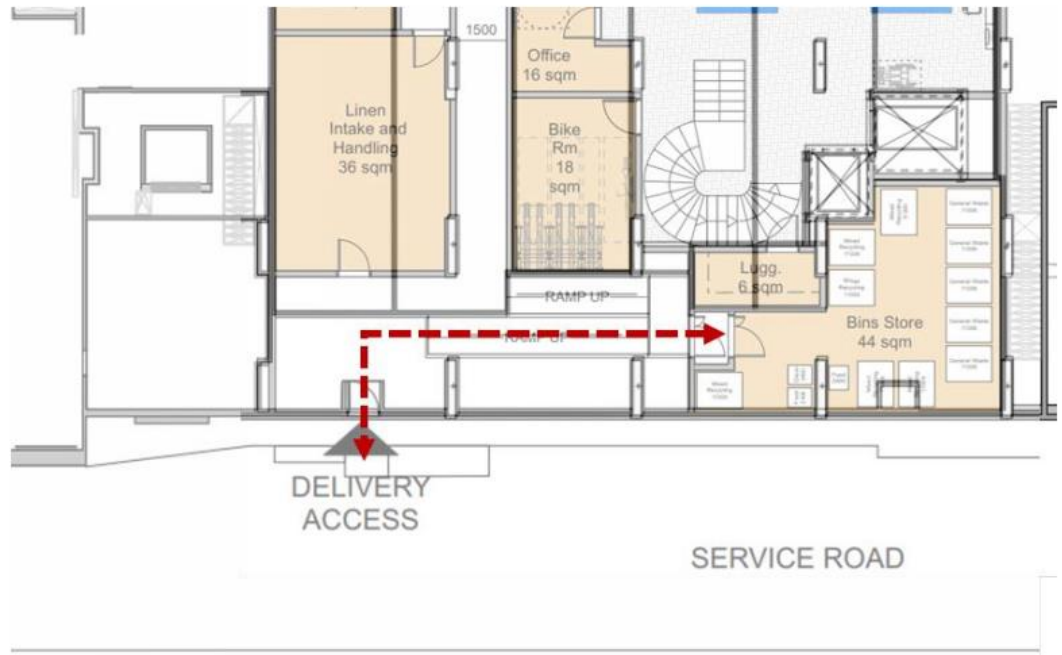


Figure 3 Bin store and transfer route (source: applicant's Waste Management Plan prepared by RGP)

- 16.10 The collection point will be adequately lit for collection staff and no public pedestrian access is available around the service road, which is entirely clear and segregated from the public highway.
- 16.11 The development would provide waste and recycling facilities in the form of 5 x 1,100 litre bins (general waste), 6 x 1,100 litre bins (mixed recycling), 2 x 240 litre bins (food waste), and 1 x 240 litre bins (glass).
- 16.12 Hotel bedrooms will be provided with a single small waste bin only, which will be collected by cleaning staff.
- 16.13 Waste and recycling material from the hotel back of house areas and kitchen will be segregated at source and directed to the appropriate bins. No food will be provided in bedrooms (no room-service is available) and will be limited to the main hotel kitchen and catering areas only.
- 16.14 All servicing activity for the hotel would be accommodated on-site within the basement level service yard, which serves the wider Brunswick Centre. Access is taken from a ramp on Marchmont Street (at the shopping centre's western frontage) and egress via a separate ramp on Hunter Street (at the shopping centre's eastern frontage).
- 16.15 The proposed hotel would be served by 3 bin collections per week, as summarised below. Deliveries and servicing of the underground hotel would

also likely be consolidated with collection of another hotel (operated by the same hotel operator) on Camden High Street. No collections would take place on Sundays or Bank Holidays:

- 3 x weekly collections
- Maximum duration of 20 minutes
- Collection timed between 06:30 and 18:00

Conclusion

16.16 In summary, the applicant's Waste Management Plan sets out a number of clearly defined procedures relating to the delivery and servicing requirements of the proposed hotel at the Brunswick Centre. The plan has been scoped to account for the potential of the hotel being operated under different hotel operators. Overall, the applicant has sought to minimise the amount of waste generated by the hotel, and the hotel would be provided with adequate facilities for the storage and collection of water and recycling and collection of these will be undertaken in a safe and efficient manner.

17. FIRE SAFETY

17.1 London Plan policy D12 Fire Safety requires all development proposals to achieve the highest standards of fire safety and incorporate the necessary measures to ensure the safety of occupants. All major development proposals should be accompanied by a Fire Statement produced by a suitably qualified assessor detailing how the development proposal will function in terms of 1) construction methods, products and materials; 2) means of escape; 3) features reducing risk to life; 4) access for fire services and equipment; 5) provision within the site curtilage for fire appliances to access the building; 6) ensuring any potential future modifications to the building will not compromise the base build fire safety/protection. Policy D5 (Inclusive Design) is also relevant in this respect which provides for safe and dignified emergency evacuation for all building users.

17.2 The Mayor introduced the London Plan policy to ensure fire safety is addressed at the outset when planning permission is applied for, instead of the issue being first considered at the Building Control stage. The London Plan policy is accompanied by the Fire Safety London Plan Guidance which was issued in draft form for consultation purposes on 11 February 2022. This informs how the mayor will expect developers to address the policy in terms of providing supporting information and also clarifies the planning authority's role in its determination of applications. The guidance states that the onus is on the applicant to demonstrate compliance with D12 and D5 through its use of fire safety professionals and that it is for the planning officer to ensure the information has been provided. The review of the fire safety measures and their compliance against building regulations and

standards will still take place at the Building Control stage and shall not be undertaken by planning officers.

- 17.3 The application is accompanied by a “Fire Safety Statement” document outlining the key fire safety features incorporated within the development. The submitted document has been prepared by Orion Fire Engineering Ltd who are a firm of qualified fire engineering consultants. It provides information on means of escape (including disabled refuge spaces), fire resistance to building structure elements, smoke clearance vents, fire-fighting staircase core provision, alarm systems and fire suppression measures.
- 17.4 In view of the above it is therefore considered that the proposals comply with London Plan policies D12 and D5.

18. EMPLOYMENT AND TRAINING OPPORTUNITIES

- 18.1 Camden Local Plan policies E1, E2 and CPG – Employment sites and business enterprises seek to secure a successful and inclusive economy. Camden will support local enterprise development, employment and training schemes for Camden residents, and recognises the importance of other employment generating uses including retail, education, health, markets, leisure and tourism.
- 18.2 The proposed underground hotel would provide jobs for local residents both during the construction and operational phases. Approximately 103.5 full-time jobs would be created as part of the operational phase.
- 18.3 The Council’s Inclusive Economy Team have been consulted on the application and their comments are incorporated below.
- 18.4 In terms of apprenticeships during the construction phase, as the build cost for this scheme exceed £3 million (total build cost of £19 million), the applicant must recruit 1 construction apprentice paid at least London Living Wage per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG (i.e. build costs of £10 million would have 3 construction apprentices and a combined support fee of £5100). Recruitment of construction apprentices should be conducted through the Council’s King’s Cross Construction Skills Centre. As the total build cost is £19 million, 6 x construction apprenticeships would be recruited with £10,200 payable as a support contribution. The construction apprenticeships and contribution would be secured through a s106 legal agreement.

- 18.5 Regarding Construction Work Experience Placements, there is an expectation for the applicant to provide a set number of work experience placements (being one placement per 500m² of employment floorspace) of not less than 2 weeks each, to be undertaken over the course of the development, and to be recruited through the Council's King's Cross Construction Skills Centre, as per section 69 of the Employment sites and business premises CPG. As the underground hotel provides an uplift of 6,538² C1 floorspace, this would equate to 13 construction work experience placements. These 13 construction work experience placements would be secured through a section 106 legal agreement.
- 18.6 In terms of Local Recruitment, Camden's standard local recruitment target is 20%. The applicant should work with the Kings Cross Construction Skills Centre to recruit to vacancies, advertising with us for no less than a week before the roles are advertised more widely.
- 18.7 Regarding Local Procurement, the applicant would also sign up to the Camden Local Procurement Code (to be secured as part of the section 106 legal agreement), as per section 61 of the Employment sites and business premises CPG. Camden's local procurement code sets a target of 10% of the total value of the construction contract. The spending of a significant proportion of the total construction build cost on supplies/suppliers, sub-contractors etc within the Camden borough area, will support local businesses and the overall functioning of the local economy.
- 18.8 The proposal also presents opportunities to secure end use / occupation phase benefits for Camden. In this regard, 3 x end use apprenticeships (rolling term) would be secured for the underground hotel operation, through a section 106 legal agreement.
- 18.9 The applicant has also confirmed their commitment to ensuring the site offers local employment benefits in the long term by:
- Joining the Council's Inclusive Business Network and promoting this and good employment practice to occupiers
 - Working with the council to deliver work experience placements through the hotel.
 - Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market, possibly through supported employment initiatives
- 18.10 Section 73 provides for a Section 106 contribution to be used by the Inclusive Economy service to support employment and training activities and local procurement initiatives. This approach is supported through policy

E2 of the Local Plan and applies to major commercial developments which will result in a net increase of 1,000sqm (GIA) or more of employment space including office, hotel and leisure developments. There is an uplift of C1 floorspace of 6,558m². The employment and training contribution has been calculated as £30,390.96, which would be secured in the section 106 legal agreement.

- 18.11 The provision of a significant number of new jobs in Camden to be created by the new underground hotel, is welcomed. As discussed in section 7.18, the proposed F&B component of the underground hotel would not create an imbalance with the existing food and beverage offerings at The Brunswick Centre. The range of employment and inclusive economy contributions to be delivered as part of implementation of the scheme, would be fully in accordance with Camden's policies regarding an inclusive economy. Overall, the proposal would deliver a hotel use within an existing mixed use retail centre, thereby contributing to the continued success of The Brunswick Centre by offering a use that complements the centre, in addition to increasing footfall to increase visitor spending, and creating further job opportunities for Camden residents.

19. HEALTH IMPACT

- 19.1 Camden Local Plan policy C1 seeks to promote strong, vibrant, and healthy communities. A Health Impact Assessment (HIA) has been carried out by the applicant and the findings of the assessment have been submitted as part of this application. The Proposed Development's potential health impact has been assessed based on the HUDU Planning for Health Rapid HIA Tool.
- 19.2 The submitted HIA finds that there would be a number of positive health impacts from the development. The proposal would prioritise and encourage walking, and reduce car use, through the partial conversion of the carpark to the underground hotel and a significant reduction of car parking at the site, with the scheme also being 'car free'. The proposal would also prioritise and encourage cycling through providing cycle parking facilities which exceed minimum short-stay cycle parking standards.
- 19.3 In particular in relation to accommodating people with mobility problems or disabilities, the principles of accessible design have been incorporated into the design of the underground hotel. Access into the hotel entrance from the ground floor will allow for step free access and step free access is also incorporated into the design of the hotel lobby and wider hotel demise. In addition, 10% of the hotel rooms would be designed as accessible rooms. The lifts from the hotel entrance would also serve to transport bicycles down to the basement where the long-stay cycle storage is located.

- 19.4 There would be an increase in employment under the proposals which is also positive health impact. The proposals have been designed to minimise crime and fear of crime, which disproportionately affects women and the elderly.
- 19.5 In some regards, the development would have a neutral impact. The proposals would have a neutral impact in terms of open space, as no new areas or improvements to existing open spaces are proposed. This is considered appropriate given the provision of the existing open spaces and the new underground hotel being contained within the existing building structure.
- 19.6 To mitigate potential negative health impact from construction impacts in terms of noise, dust and pollution, a Construction Management Plan would be secured via section 106 agreement.
- 19.7 The proposals would particularly benefit Camden residents through the provision of increased employment opportunities during the construction and operational phases. Overall, the development is designed to improve health outcomes for existing residents and visitors to the area, as well as new visitors to the area brought about by the proposed hotel.

20. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 20.1 No new floorspace is proposed and so the scheme will not be CIL liable. The CIL applies to all proposals which add 100m² of new floorspace or an extra dwelling. This includes bringing vacant buildings back into use. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule.
- 20.2 The proposed development is liable for both Mayoral and Camden CIL. The development would have an uplift of 6,538sqm GIA (Class C1 hotel accommodation). Based on the Mayor's CIL2 and Camden's CIL charging schedules and the information submitted the charges would be approximately £1,634,500.00

Mayor CIL2

Hotel - £140 sqm (Central London and Isle of Dogs)

Camden

Hotel - £110 sqm (Zone A – Central)

- Camden CIL: £719,180.00
- Mayoral CIL: £915,320.00
- **Total CIL: £1,634,500.00**

20.3 The above is an estimate only and would be subject to the verification of the proposed floor area and calculations by the Council's CIL team.

21. CONCLUSION

21.1 The proposed development is a well-considered scheme which would be in accordance with local and national policies.

21.2 With regard to land use, the proposals involve the conversion of part of the existing Brunswick Centre's underground car park, which has been identified as being underutilised. The proposed underground hotel and provision of additional short stay accommodation would represent a more efficient use of this space and bring significant economic benefits for the local area, and be in accordance with both local and national policies. Underground hotel accommodation is an established type of short-stay accommodation and are already existing in Camden. The underground hotel is designed to be high-quality and would complement the existing mix of uses at The Brunswick Centre.

21.3 The existing building make a positive contribution to the character and appearance of the Bloomsbury Conservation Area and is Grade II listed.

21.4 The proposed development is in general accordance with policies of the development plan and the National Planning Policy Framework (2021). The application has also been considered in respect of the NPPF tests for impact on heritage assets. Officers identify there to be less than substantial harm to the significance of the designated heritage asset, as a result of the interventions to the plan form and alterations/removal of fabric at the underground car park, retail unit and at roof level. Harm has been minimised through limiting the extent of building fabric to be removed internally, limiting the scope of intervention by placing new plant at the least sensitive locations on the building roof, and overall limiting the extent of visible change to the external appearance of the building.

21.5 Paragraph 202 of the NPPF states that less than substantial harm to a designated heritage asset should be weighed against the public benefits of the proposals in reaching a decision.

21.6 There are several key public benefits that officers consider are capable of outweighing the harm. These benefits include:

- Implementation of concrete repair works to the Brunswick Centre
- Provision of residents' cycle parking

- Economic benefits in the creation of jobs during the construction phase (temporary) and operation of the hotel
 - Economic benefits to local businesses and wider Borough as a whole
- On balance, it is considered that the application is acceptable with public benefits of the scheme, capable of outweighing the harm. Considerable weight and importance has been given to the identified harm.

21.7 In addition, the development would not result in undue harm to neighbouring amenity, nor to the local transport network or infrastructure subject to the recommended conditions and S106 obligations.

21.8 Paragraph 10 of the NPPF states that there is a presumption in favour of sustainable development, which should be a golden thread running through decision making. The dimensions of sustainable development are economic, social and environmental which should be sought jointly. The proposed development would result in benefits through all three strands of sustainable development without any adverse impacts significantly or demonstrably outweighing them. The proposal is considered to be a favourable sustainable development that is in accordance with relevant National and Regional Policy, the Camden Local Plan, Camden Planning Guidance and other supporting policy guidance for the reasons noted above.

22. RECOMMENDATION

22.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:

- Concrete repair works to be completed in accordance with Heritage Offer/Concrete Repair document.
- Sustainability plan (BREEAM compliance) – secure BREEAM Excellent rating
- Carbon offset payment of £110,301
- Car-free development.
- Conversion of 3 x standard car parking space in the existing car park to accessible bays (2 x accessible spaces for NCP car park and 1 x accessible space for residential car park), and provision of an electric vehicle charging point.
- Travel plan and associated monitoring and measures contribution of £11,221.
- Off-site contribution of £20,000 for an electric vehicle charging point and bay.
- Construction Management Plan (CMP) and CMP implementation support contribution of £29,943.

- CMP Impact Bond of £31,497.
- Requirement to form a construction working group consisting of representatives from the local community.
- Operational Management Plan (including provisions to limiting groups to no more than 8; no coach parties accepted)
- Delivery and Servicing plan.
- Cycle improvements on Guilford Street (introducing with-flow and contraflow cycle facilities) of £100,000
- Pedestrian Improvement (enhancements to be delivered in the Holborn Liveable Neighbourhood) (£100,000)
- Environmental Improvements to the northbound cycle contraflow on Marchmont Street between Bernard Street and Coram Street (£50,000)
- Bus improvements to Woburn Place (£50,000)
- Micromobility (extension of existing dockless cycle bay on Bernard Street) (£2,000)
- Residential on-site cycle parking (20x spaces) to be provided
- Employment and training contribution of £30,390.06
- Construction Apprenticeships - 6 Apprentices paid London Living Wage + £10,200 in support fees
- Construction Work Experience Placements - 13 work experience placements
- Local Recruitment - Work with King's Cross Construction Skills Centre to recruitment in line with Camden's local recruitment target of 20% advertising with Council for no less than a week before the roles are advertised more widely.
- Local Procurement - Sign up to the Camden Local Procurement Code which sets a target of 10% of the total value of the construction contract.
- End Use Apprenticeships – 3 x end use apprenticeships for the hotel use on a rolling term.
- Local Employment Commitments (Network) – Joining the Council's Inclusive Business Network and promoting this and good employment practice to occupiers.
- Local Employment Commitments (Work Experience) – Working with the Council to deliver work experience placements through the hotel.
- Local Employment Commitments (Recruitment) - Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market possibly through supported employment initiatives.

23. LEGAL COMMENTS

- 23.1 Members are referred to the note from the Legal Division at the start of the Agenda.

24. CONDITIONS PLANNING PERMISSION 2023/3870/P

1	<p>Three years from the date of this permission</p> <p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans and documents:</p> <p>BREEAM pre-assessment prepared by Greengage, dated July 2023; Cumulative Impact Area Statement and Checklist prepared by Camden Council, dated 13/07/2023; Construction/Demolition Management Plan pro forma prepared by Eddie Halligan, dated 20/07/2023; Delivery and Servicing Management Plan prepared by RGP, ref. 2023/5262/DSMP01, dated August 2023; Operator's Hotel Management Plan prepared by Whitbread; Employment and Training Strategy prepared by Whitbread, dated August 2023; Energy Statement prepared by Greengage, dated July 2023; Fire Safety Statement prepared by Orion Fire Engineering, ref. OF-000957-OFS-01-C, dated 4/09/2023; Flood Risk Assessment & Drainage Report prepared by Heyne Tillett Steel, ref. 2911, rev 04, dated August 2023; Heritage, Listed Building and Townscape Assessment prepared by Purcell, rev 2, dated August 2023; Statement of Community Involvement prepared by Kanda, dated July 2023; Structural Planning Report prepared by Heyne Tillett Steel, ref. 2911, dated 29/08/2023; Sustainability Statement prepared by Greengage, dated July 2023; Healthy Streets Transport Assessment prepared by RGP, dated September 2023; Travel Plan prepared by RGP, dated September 2023; Waste Management Plan prepared by RGP, dated August 2023; Design and Access Statement prepared by Axiom Architects; Acoustic Planning Report prepared by Clarke Saunders, dated 4/08/2023; Air Quality Assessment prepared by Phlorum, ref. 12129.S, dated 14/06/2023; Arboricultural Method Statement prepared by James Blake Associates, ref. JBA 23/138 AR01, rev E, dated 29/08/2023; Planning Statement prepared by Gerald Eve, dated September 2023; Rapid Health Impact Assessment Matrix prepared by Gerald Eve, dated 05/10/2023; Hotel Evidence Statement prepared by Whitbread, dated 22/09/2023; Air Quality Proforma prepared by Gerald Eve; Energy and Sustainability Proforma prepared by Gerald Eve</p> <p>4742-PA1- 001, rev B; 4742-PA1- 002, rev B; 4742-PA1- 003, rev F; 4742-PA1-004, rev C; 4742-PA1- 005, rev C; 4742-PA1- 008, rev B; 4742-PA1- 009, rev B; 4742-PA1- 010, rev B; 4742-PA1-010R, rev B;4742-PA1-011, rev B; 4742-PA1-012, rev B; 4742-PA1-013, rev B; 4742-PA1-014, rev B; 4742-PA1-015, rev B; 4742-PA1-016, rev B; 4742-PA1-017, rev C; 4742-PA1-018, rev B; 4742-PA1-098, rev C; 4742-PA1-099, rev C; 4742-PA1-100, rev B; 4742-PA1-101, rev B; 4742-PA1-130, rev C; 4742-PA1-131, rev B; 4742-PA1-132, rev C; 4742-PA1-133, rev C; 4742-PA1-134, rev B; 4742-PA1-135, rev C; 4742-PA1-200, rev B; 4742-PA1-301, rev B; 4742-PA1-302, rev B; 3608-PSH-XX-XX-DR-M-7900, rev P1; 3608-PSH-XX-XX-DR-M-7901, rev P1; 3608-PSH-ZZ-06-DR-E-9101-1; 3608-PSH-ZZ-</p>

	<p>06-DR-E-9101-2; 3608-PSH-ZZ-06-DR-E-9101-3; 3608-PSH-ZZ-06-DR-E-9101-4; 3608-PSH-ZZ-06-DR-M-7002-1, rev P1; 3608-PSH-ZZ-06-DR-M-7002-2, rev P1; 3608-PSH-ZZ-06-DR-M-7002-3, rev P1; 3608-PSH-ZZ-06-DR-M-7002-4, rev P1; 3608-PSH-ZZ-B1-DR-M-7000-1, rev P2; 3608-PSH-ZZ-B1-DR-M-7000-2, rev P2; 3608-PSH-ZZ-B1-DR-M-7000-3, rev P2; 3608-PSH-ZZ-B1-DR-M-7000-4, rev P2; 3608-PSH-ZZ-B1-DR-M-7004, rev P1; 3608-PSH-ZZ-B2-DR-M-7001-1, rev P2; 3608-PSH-ZZ-B2-DR-M-7001-2, rev P2; 3608-PSH-ZZ-B2-DR-M-7001-3, rev P1; 3608-PSH-ZZ-B2-DR-M-7001-4, rev P1; 3608-PSH-ZZ-ZZ-DR-E-8800, rev P1; 3608-PSH-ZZ-ZZ-DR-M-7003, rev P1; 3608-PSH-ZZ-ZZ-DR-M-7005;</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Long-stay cycle parking</p> <p>The approved long-stay cycle parking facility comprising two-tier stands for 11 x cycles shall be provided as shown on plan 4742-PA1-099, rev C, prior to the occupation of the development and shall thereafter be permanently retained as such.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.</p>
4	<p>Short-stay cycle parking</p> <p>The approved short stay cycle parking facility comprising 3 x Sheffield stands shall be provided as shown on plan 4742-PA1-100, rev B, prior to the occupation of the development and shall thereafter be permanently retained as such.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.</p>
5	<p>Deliveries and collections</p> <p>Deliveries and collections (including waste collections) shall be taken at or despatched from the site only between 0630hrs and 2100hrs on any day.</p> <p>Reason: To safeguard amenities of adjacent premises in accordance with the requirements of policies A1 and T4 of the London Borough of Camden Local Plan 2017.</p>
6	<p>Refuse and recycling storage facilities</p>

	<p>Prior to occupation of the development the refuse and recycling storage facilities intended for its occupiers shall be provided as shown on the drawings hereby approved. Thereafter the refuse and recycling storage facilities shall be permanently retained as such.</p> <p>Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5, A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
7	<p>Water supply</p> <p>No development shall be occupied until confirmation has been provided that either:</p> <ul style="list-style-type: none"> - all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. <p>Reason: To ensure the water supply infrastructure has sufficient capacity to cope with the additional demand in accordance with the requirements of Policy A5 of the Camden Local Plan 2017.</p>
8	<p>Drainage</p> <p>The development shall proceed in strict accordance with the drainage drawings and strategy accompanying this application. The strategy shall be fully implemented as approved before the first occupation of the development.</p> <p>Reason: To reduce the rate of surface and foul water discharge from the buildings and limit the risk to the occupiers of the development and the surrounding area from flooding in accordance with Policies A5, CC1, CC2, CC3 of the London Borough of Camden Local Plan 2017.</p>
9	<p>Photovoltaic cells details</p> <p>Prior to commencement of construction other than lowering of the basement slab and preparation of the basement area, drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy</p>

	<p>output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.</p>
10	<p>Air Source Heat Pump details</p> <p>Prior to commencement of construction other than lowering of the basement slab and preparation of the basement area, details, drawings, and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or COP of 4 or more or SCOP of 3.4 or more) and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing.</p> <p>The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local Plan 2017.</p>
11	<p>Greywater harvesting system</p> <p>Prior to commencement of development other than site clearance & preparation, details of greywater recycling proposals should be submitted to the local planning authority and approved in writing. Submitted details should include drainage layouts, drawings, predicted reductions in water usage and a site-specific lifetime maintenance schedule for the proposed system. The development shall thereafter be constructed in accordance with the approved details.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with Policies CC1, CC2, CC3 of the London Borough of Camden Local Plan 2017.</p>
12	<p>Secure by Design</p>

	<p>Prior to above ground works, evidence that the plans can achieve secured by design accreditation to Silver Award, must be submitted to and approved in writing (in consultation with the Designing Out Crime Officer) by the local planning authority. The design accreditation shall be maintained for the duration of the life of the development.</p> <p>Reason: To ensure the development minimises the opportunities for crime and anti-social behaviour and ensures community safety in accordance with policy D1 and C5 of the Camden Local Plan 2017 and policy D11 of the London Plan 2021.</p>
13	<p>Diesel back-up generators</p> <p>Prior to commencement of construction other than lowering of the basement slab and preparation of the basement area, details of the proposed Emergency Diesel Generator Plant and any associated abatement technologies including make, model and emission details shall have been submitted to and approved by the Local Planning Authority in writing. Generators should be appropriately sized for life saving functions only, alternatives to diesel fully considered and testing minimised. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and details of emission certificates by an accredited MCERTS organisation shall be provided following installation and thereafter every three years to verify compliance with regulations made by the Secretary of State.</p> <p>Reason: To safeguard the amenity of occupants, adjoining premises and the area generally in accordance with policy A1 and CC4 of the Camden Local Plan 2017, and policy GG3 and SI1 of the London Plan 2021.</p>
14	<p>Mechanical ventilation</p> <p>Prior to commencement of development excluding demolition and site preparation works, full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads and the boiler or any other emission sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.</p> <p>Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.</p>
15	<p>Non-road mobile machinery</p> <p>No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any</p>

	<p>superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).</p> <p>Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the Camden Local Plan 2017, and policy GG3 and SI 1 of the London Plan.</p>
16	<p>Anti-vibration isolators</p> <p>Prior to use, the plant located at the rooftop shall be mounted with proprietary anti-vibration isolators.</p> <p>Reason: To ensure that the amenity of occupiers of the development site / surrounding premises is not adversely affected by vibration from mechanical installations/ equipment, in accordance with Policy A4 of the Camden Local Plan 2017.</p>
17	<p>Cumulative sound level from new external building services and fixed plant</p> <p>The cumulative sound level from new external building services and fixed plant shall be 10dB(A) or more below the background sound level (15dB if tonal components are present) at the nearest residential receptor window or façade at any time. Where using pre-existing ventilation systems, noise emissions from existing ventilation louvres shall be equal to or lower than the pre-existing level. The plant and equipment shall be installed and constructed to ensure compliance with the above requirements and an acoustic report submitted to provide suitable evidence prior to operation.</p> <p>Reason: To ensure that the amenity of occupiers of the development site / surrounding premises is not adversely affected by noise from mechanical installations/ equipment, in accordance with Policy A4 of the Camden Local Plan 2017.</p>
18	<p>Emergency Plant – Noise</p> <p>Noise emitted from the emergency plant and generators hereby permitted shall not increase the minimum assessed background noise level (expressed as the lowest 24 hour LA90, 15 mins) by more than 10dB one metre outside any premises. Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>

19	<p>Emergency Plant – Testing</p> <p>Testing of emergency plant and generators hereby permitted may be carried out only for up to one hour in a calendar month, and only during the hours 09.00 to 17.00 hrs Monday to Friday and not at all on public holidays.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
20	<p>Wheelchair accessible rooms</p> <p>Prior to the commencement of use of the hotel, there shall be the provision of 10 (5%) fully wheelchair accessible rooms.</p> <p>Reason: To ensure that the internal layout of the building makes sufficient provision for the needs of people with disabilities in accordance with the requirements of policy D5 of the London Plan 2021 and Policy C6 of the London Borough of Camden Local Plan 2017.</p>
21	<p>Premises to only be used as hotel</p> <p>Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order, 1987, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the premises shall not be used other than as a hotel within a single planning unit.</p> <p>Reason: In order to ensure that the amenities of the surrounding area are protected in accordance with policies A1, A4 and D1 of the London Borough of Camden Local Plan (2017).</p>
22	<p>Group bookings</p> <p>The hotel hereby permitted shall not accept group bookings for parties of more than 8 people.</p> <p>Reason: In order to ensure that the amenities of the surrounding area are protected in accordance with policies A1, A4 and D1 of the London Borough of Camden Local Plan (2017).</p>
23	<p>Number of hotel bedrooms</p> <p>The development hereby permitted shall not comprise more than 207 hotel bedrooms upon completion and shall be delivered in accordance with the approved plans set out in Condition 2 of this planning permission.</p>

	Reason: In order to ensure that the amenities of the surrounding area are protected in accordance with policies A1, A4 and D1 of the London Borough of Camden Local Plan (2017).
24	<p>Fire safety</p> <p>The development shall at all times be occupied and managed in strict compliance with the Fire Statement prepared by Orion Fire Engineering dated 4/09/2023.</p> <p>Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with policies D5 and D12 of the London Plan.</p>

25. INFORMATIVES PLANNING PERMISSION 2023/3970/P

1	Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.
2	This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.
3	Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.

4	Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.
5	Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
6	This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
7	<p>The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; and construction methods;</p> <p>This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.</p>
8	Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.
9	Non-road mobile machinery (NRMM) is any mobile machine or vehicle that is not solely intended for carrying passengers or goods on the road. The Emissions requirements are only applicable to NRMM that is powered by diesel, including diesel hybrids. For information on the NRMM Low Emission Zone requirements and to register NRMM, please visit " http://nrmm.london/ ".
4	We recommend that hotel bedrooms shall be designed and located such that the unoccupied noise levels do not exceed the criteria specified in <i>Table H.1 Airborne Sound Insulation</i> and <i>Table H.3 Indoor ambient noise level ranges for hotel bedrooms</i> of BS8233:2014.

26. CONDITIONS LISTED BUILDING CONSENT 2023/3901/L

1	<p>Implementation</p> <p>The works hereby permitted shall be begun not later than the end of three years from the date of this consent.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans and documents:</p> <p><u>Documents:</u></p> <p>Heritage, Listed Building and Townscape Assessment prepared by Purcell, rev 2, dated August 2023; Structural Planning Report prepared by Heyne Tillett Steel, ref. 2911, dated 29/08/2023; Heritage Offer/Concrete Repair document, dated February 2024</p> <p><u>Plans:</u></p> <p>4742-PA1- 001, rev B; 4742-PA1- 002, rev B; 4742-PA1- 003, rev F; 4742-PA1- 004, rev C; 4742-PA1- 005, rev C; 4742-PA1- 008, rev B; 4742-PA1-009, rev B; 4742-PA1- 010, rev B; 4742-PA1-010R, rev B;4742-PA1-011, rev B; 4742-PA1-012, rev B; 4742-PA1-013, rev B; 4742-PA1-014, rev B; 4742-PA1-015, rev B; 4742-PA1-016, rev B; 4742-PA1-017, rev C; 4742-PA1-018, rev B; 4742-PA1-098, rev C; 4742-PA1-099, rev C; 4742-PA1-100, rev B; 4742-PA1-101, rev B; 4742-PA1-130, rev C; 4742-PA1-131, rev B; 4742-PA1-132, rev C; 4742-PA1-133, rev C; 4742-PA1-134, rev B; 4742-PA1-135, rev C; 4742-PA1-200, rev B; 4742-PA1-301, rev B; 4742-PA1-302, rev B; 3608-PSH-XX-XX-DR-M-7900, rev P1; 3608-PSH-XX-XX-DR-M-7901, rev P1; 3608-PSH-ZZ-06-DR-E-9101-1; 3608-PSH-ZZ-06-DR-E-9101-2; 3608-PSH-ZZ-06-DR-E-9101-3; 3608-PSH-ZZ-06-DR-E-9101-4; 3608-PSH-ZZ-06-DR-M-7002-1, rev P1; 3608-PSH-ZZ-06-DR-M-7002-2, rev P1; 3608-PSH-ZZ-06-DR-M-7002-3, rev P1; 3608-PSH-ZZ-06-DR-M-7002-4, rev P1; 3608-PSH-ZZ-B1-DR-M-7000-1, rev P2; 3608-PSH-ZZ-B1-DR-M-7000-2, rev P2; 3608-PSH-ZZ-B1-DR-M-7000-3, rev P2; 3608-PSH-ZZ-B1-DR-M-7000-4, rev P2; 3608-PSH-ZZ-B1-DR-M-7004, rev P1; 3608-PSH-ZZ-B2-DR-M-7001-1, rev P2; 3608-PSH-ZZ-B2-DR-M-7001-2, rev P2; 3608-PSH-ZZ-B2-DR-M-7001-3, rev P1; 3608-PSH-ZZ-B2-DR-M-7001-4, rev P1; 3608-PSH-ZZ-ZZ-DR-E-8800, rev P1; 3608-PSH-ZZ-ZZ-DR-M-7003, rev P1; 3608-PSH-ZZ-ZZ-DR-M-7005;</p>

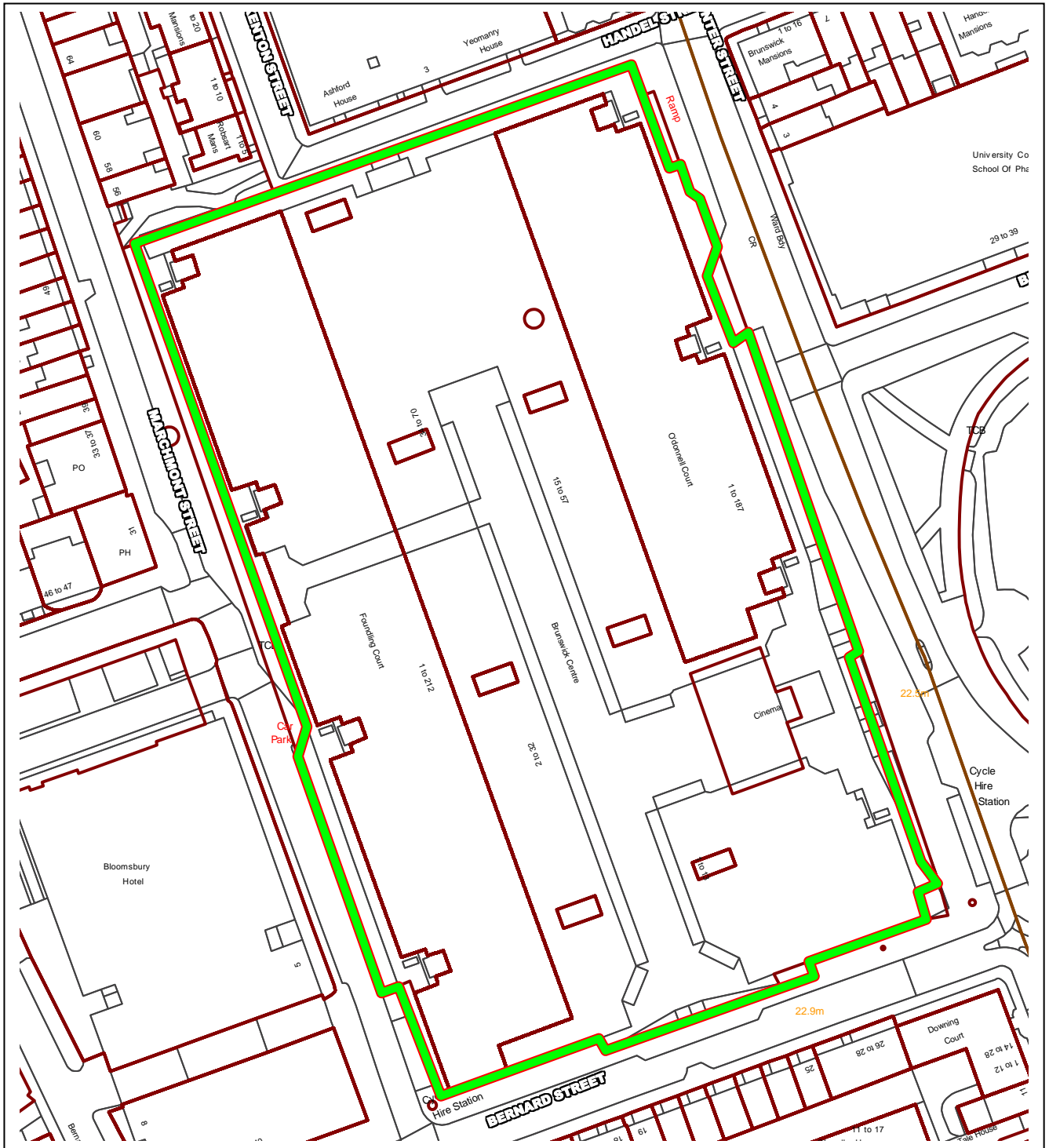
	<p>Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.</p>
3	<p>New work to match original</p> <p>All new work and work of making good shall be carried out to match the existing adjacent work as closely as possible in materials and detailed execution.</p> <p>Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of Policy D2 of the Camden Local Plan 2017.</p>
3	<p>Concrete repairs</p> <p>Prior to the occupation of the development, evidence that the concrete repair works as specified in the approved Heritage Offer/Concrete Repair document, dated February 2024, have been completed, shall be provided to the satisfaction of the local planning authority.</p> <p>Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.</p>
4	<p>Lobby and F&B area</p> <p>Before the commencement of the relevant works, detailed drawings at an appropriate scale of the lower ground floor lobby and F&B area shall be submitted to and approved by the local planning authority providing details of the following:</p> <ul style="list-style-type: none"> - concrete encasement - floor finishes in the lobby area Details of the junctions between the new work and the existing building <p>Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.</p>
5	<p>Reception / shopfront details</p> <p>Before the commencement of the relevant works, detailed drawings at an appropriate scale of the exterior of the hotel entrance and interior ground</p>

	<p>floor lobby area shall be submitted to and approved by the local planning authority providing details of the following:</p> <ul style="list-style-type: none"> - details of the entrance door; - the walkway and staircase - details of the junctions between the new work and the existing building <p>Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.</p>
6	<p>Servicing arrangements</p> <p>Before the commencement of the relevant works, servicing arrangements for the rooftop plant equipment including ASHPs and PV panels shall be submitted to and approved by the local planning authority.</p> <p>Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.</p>

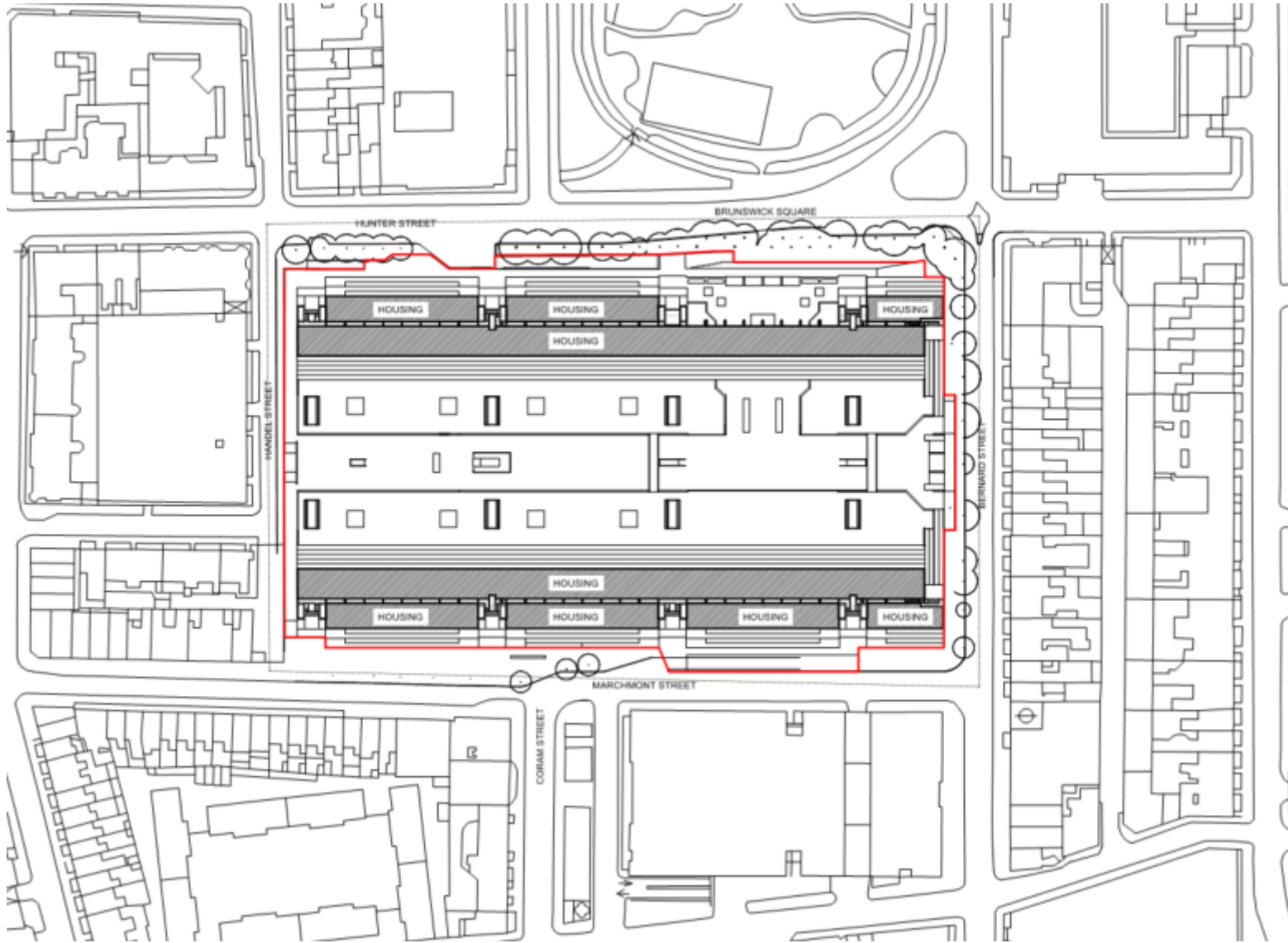
27. INFORMATIVES (PLANNING PERMISSION AND LISTED BUILDING CONSENT)

10	<p>You are advised that any works of alterations or upgrading not included on the approved drawings which are required to satisfy Building Regulations or Fire Certification may require a further application for listed building consent.</p>
----	---

The Brunswick Centre - 2023/3870/P



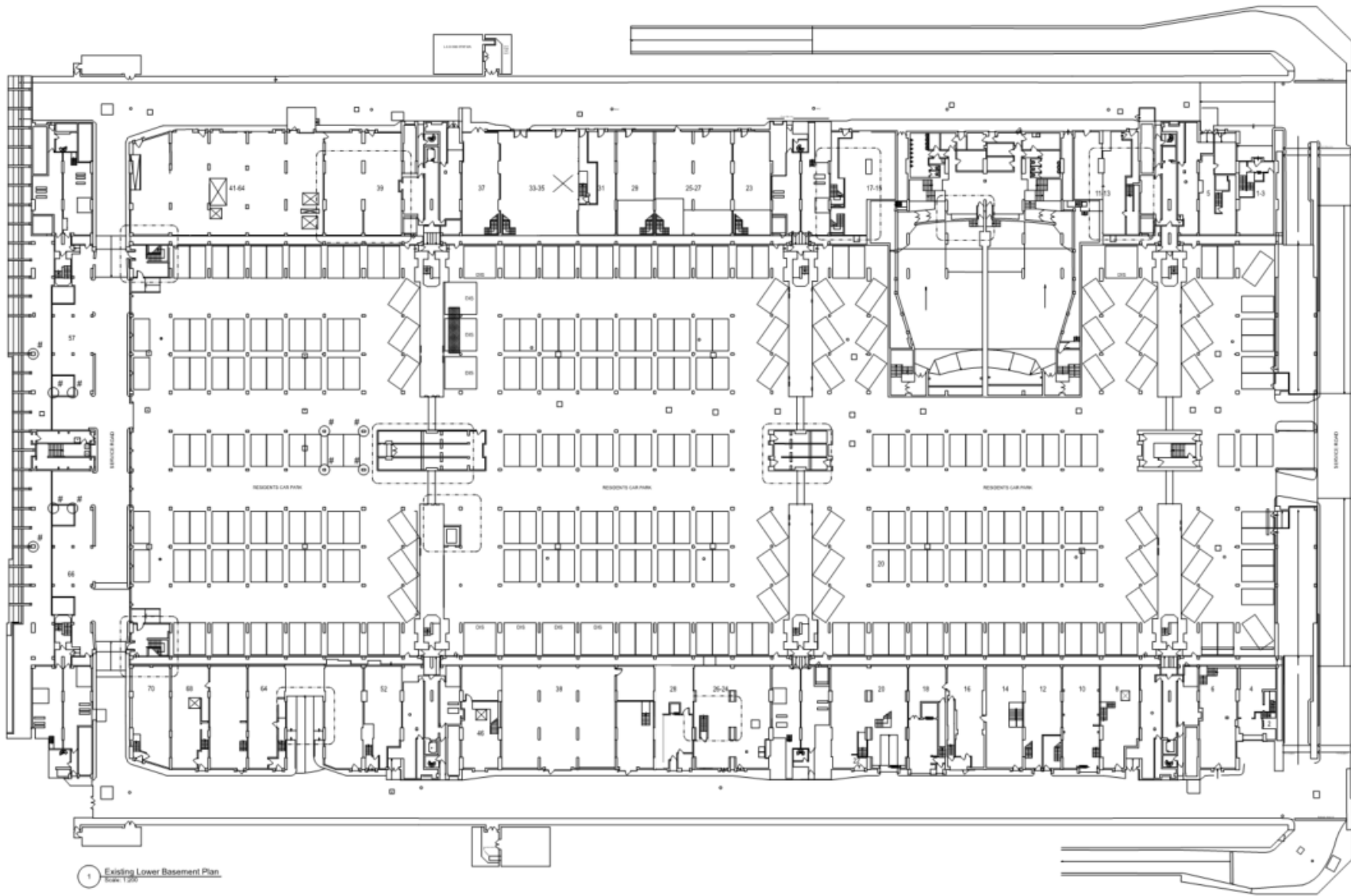
This material has been reproduced from Ordnance Survey digital map data with the permission of the controller of Her Majesty's Stationery Office, © Crown Copyright.



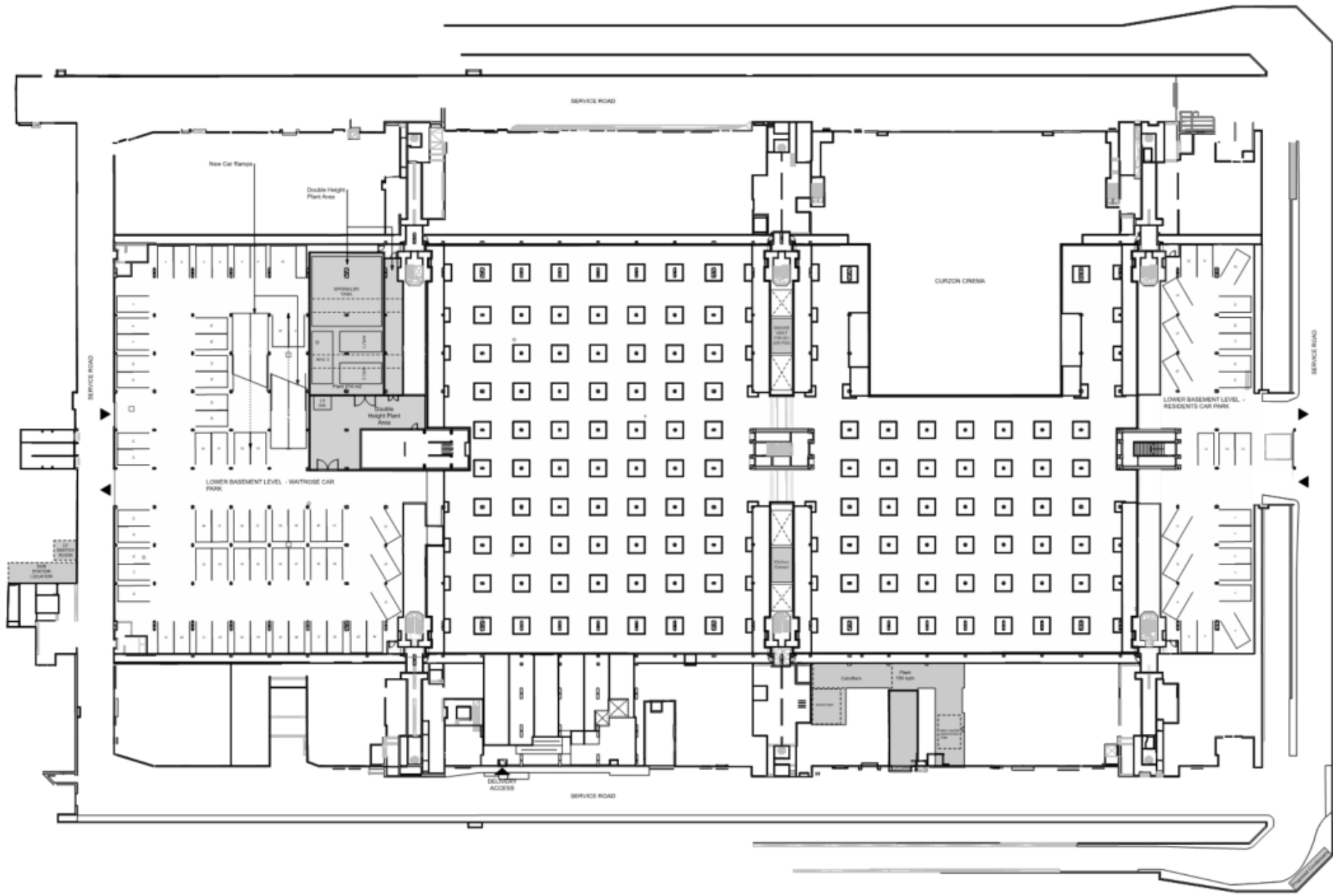


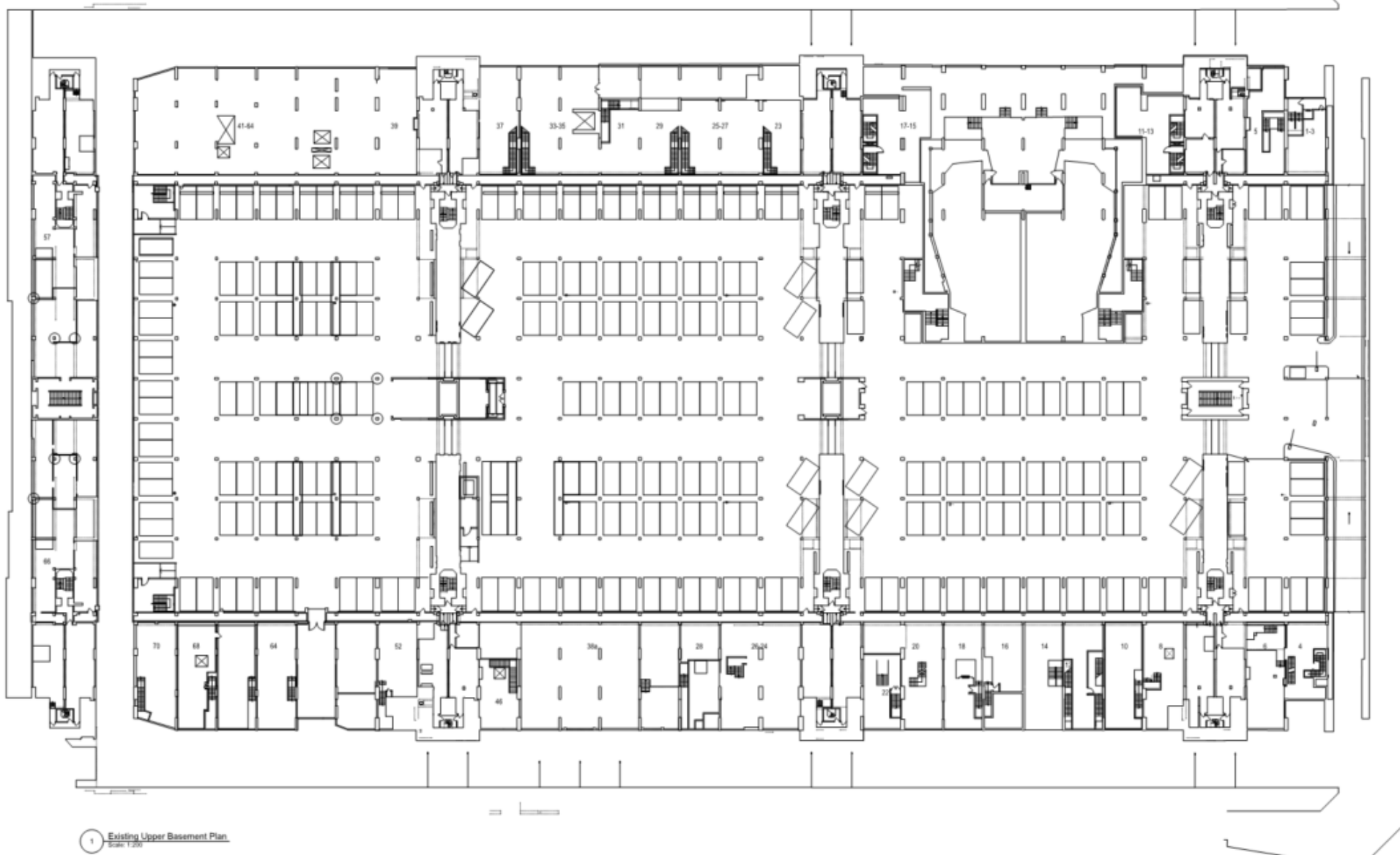
Public green area in a leafy square

Marchmont Community Garden

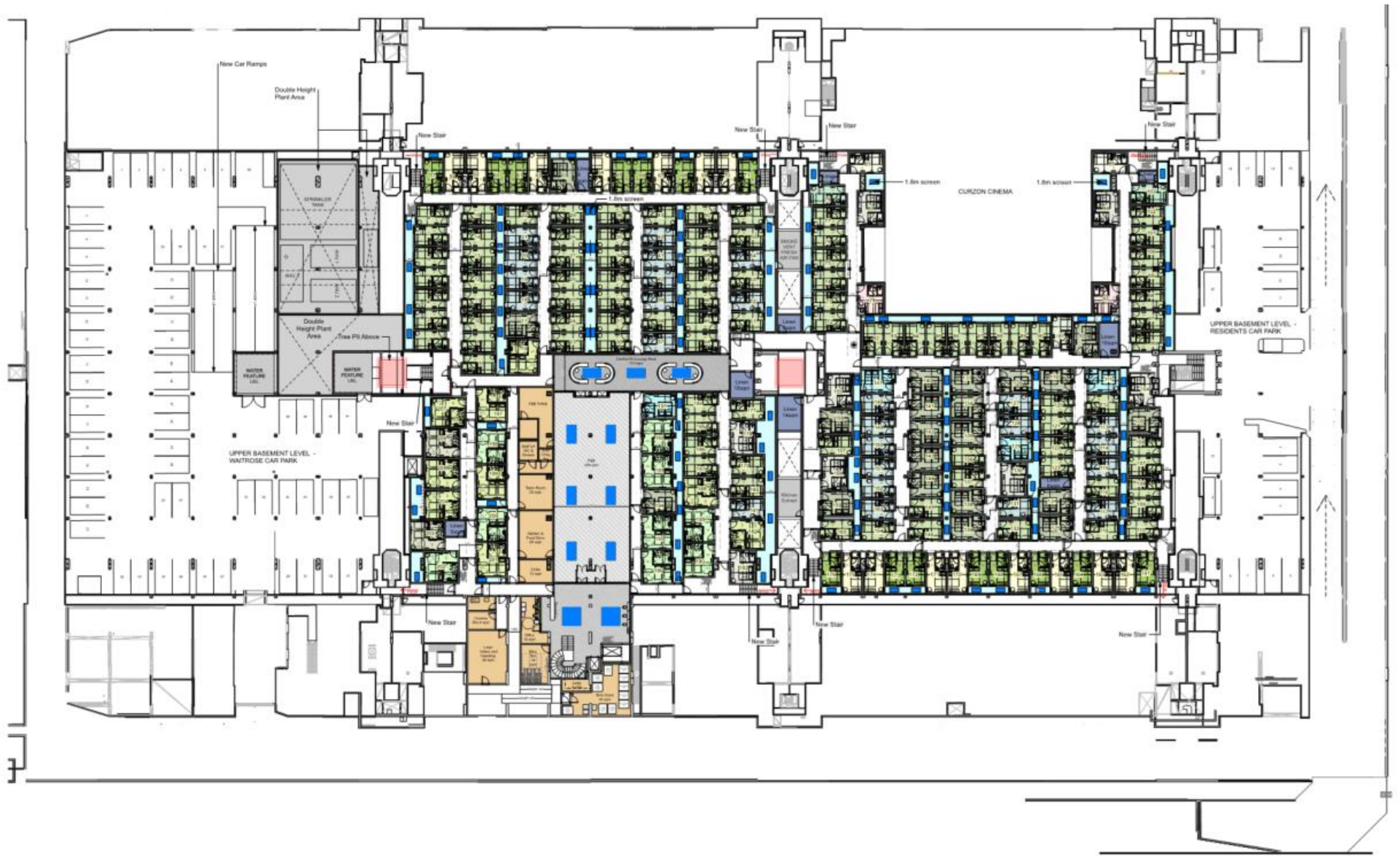


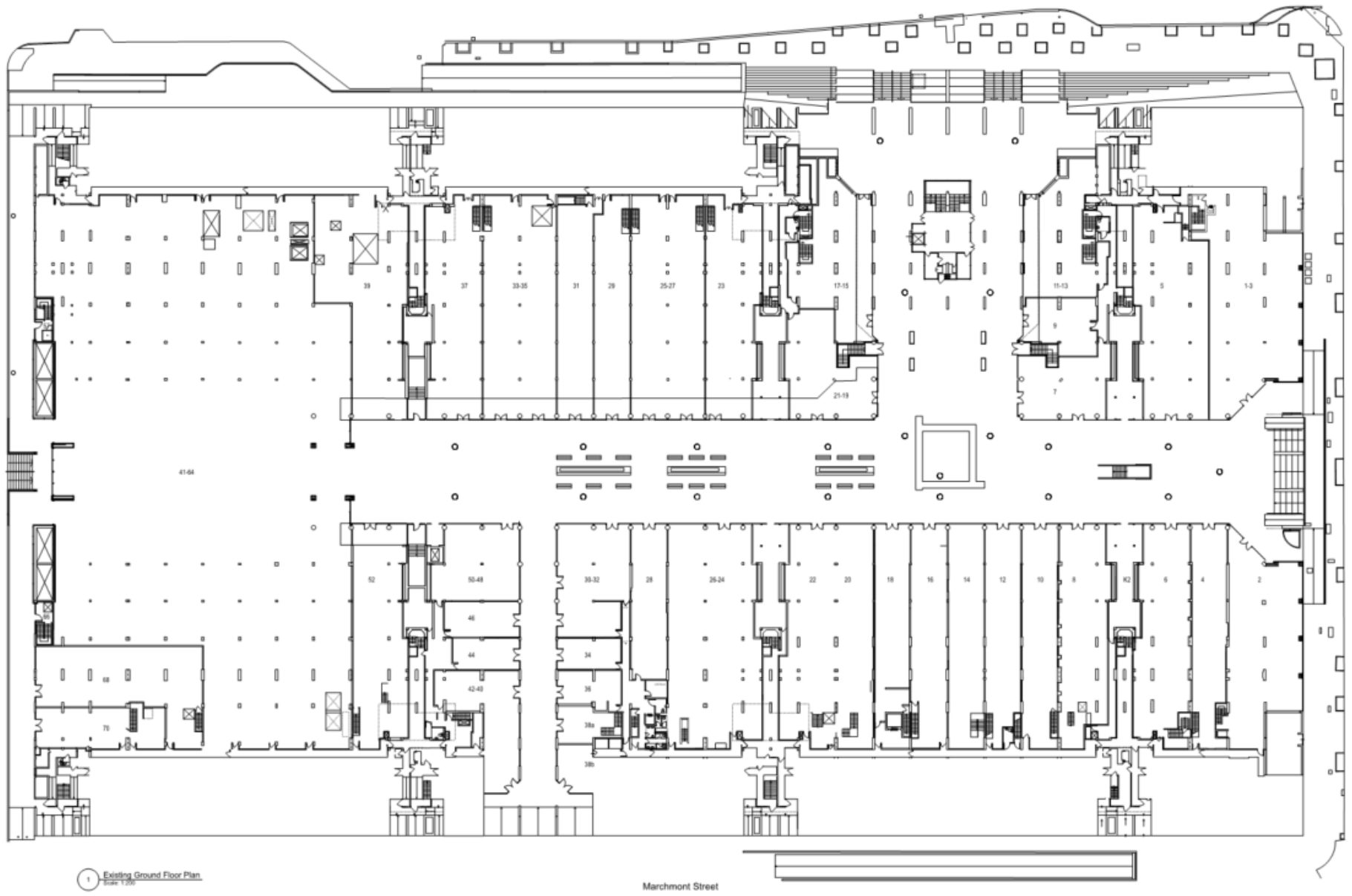
1 Existing Lower Basement Plan
Scale: 1:250

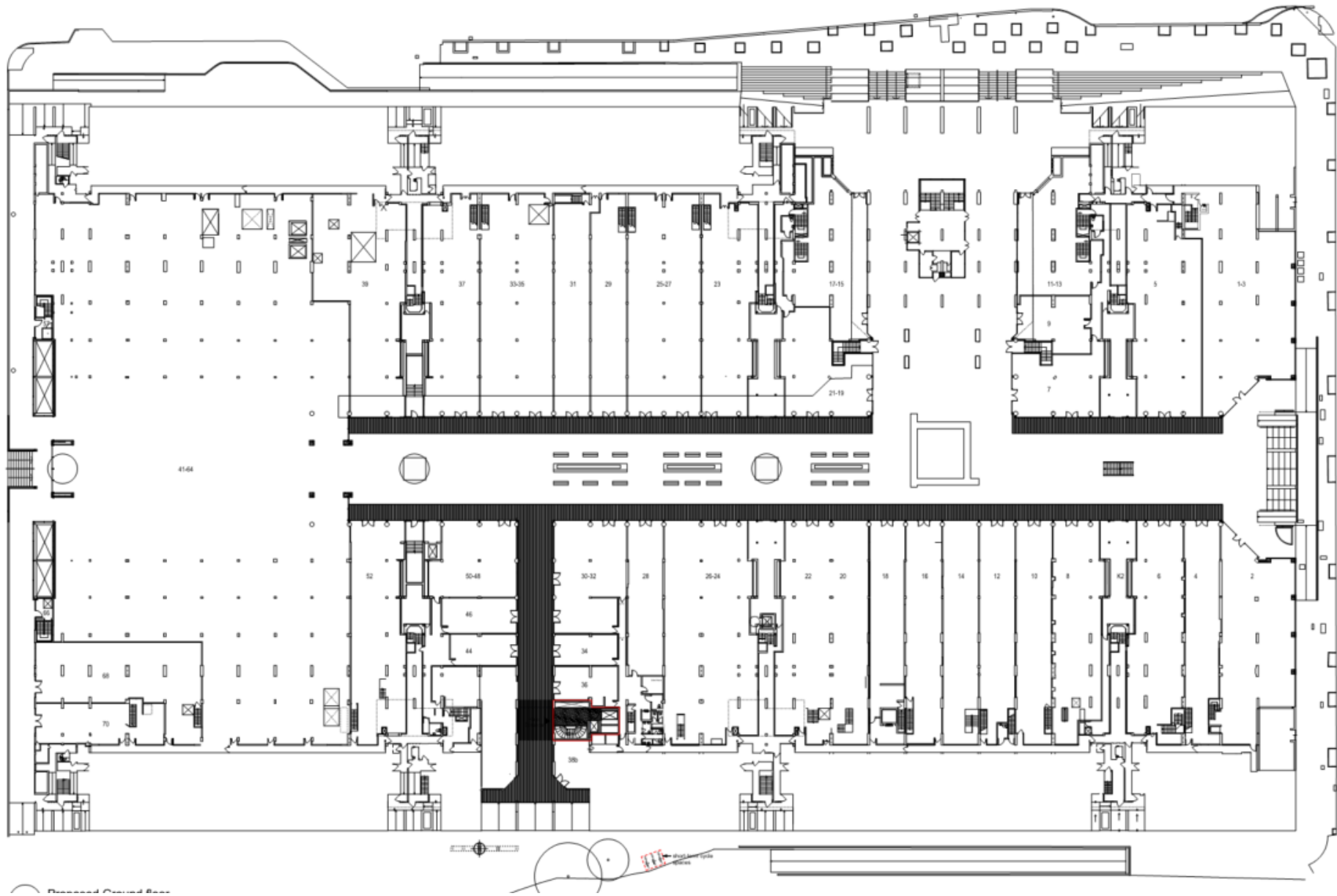


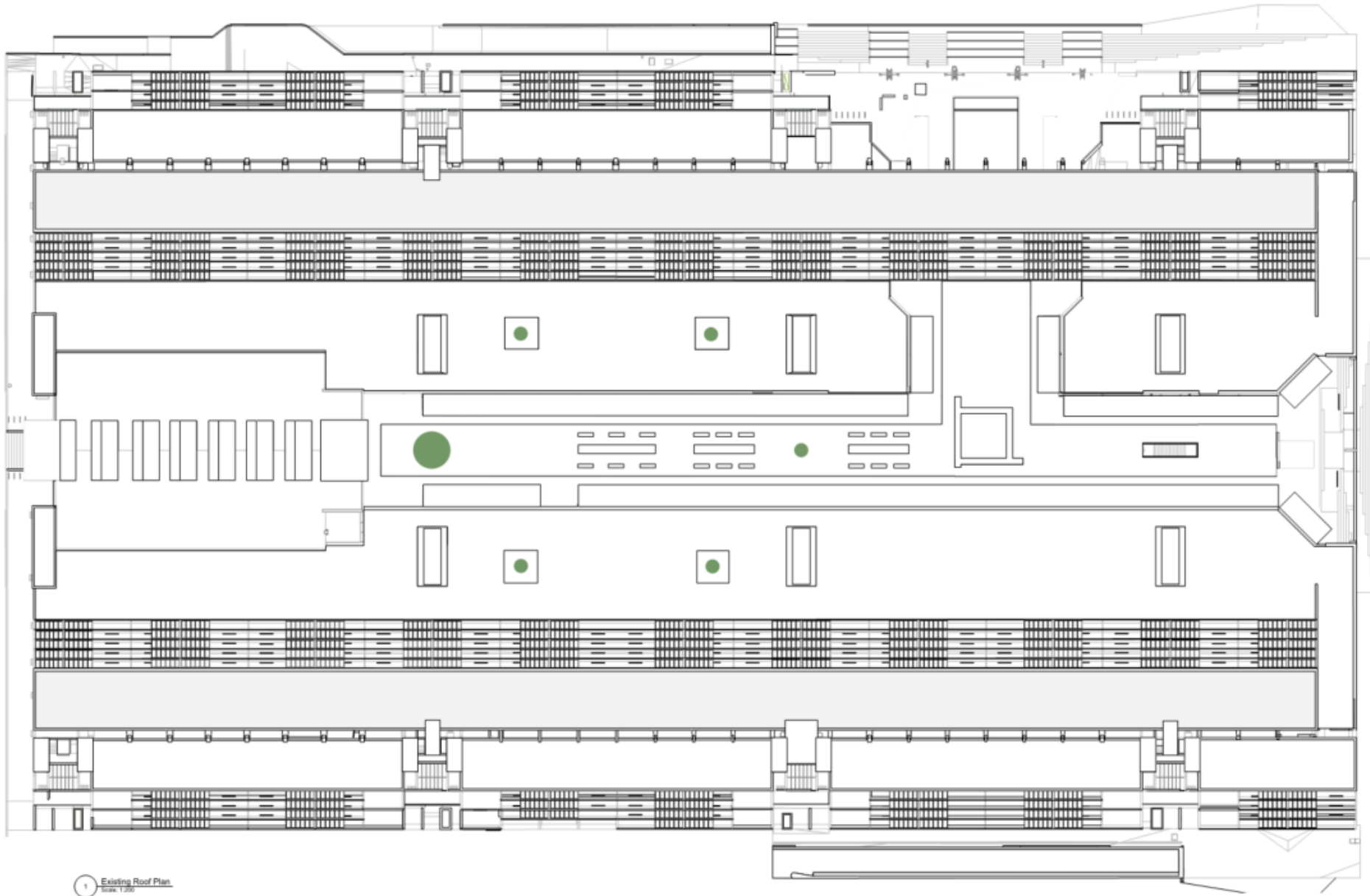


1 Existing Upper Basement Plan
Scale 1:200

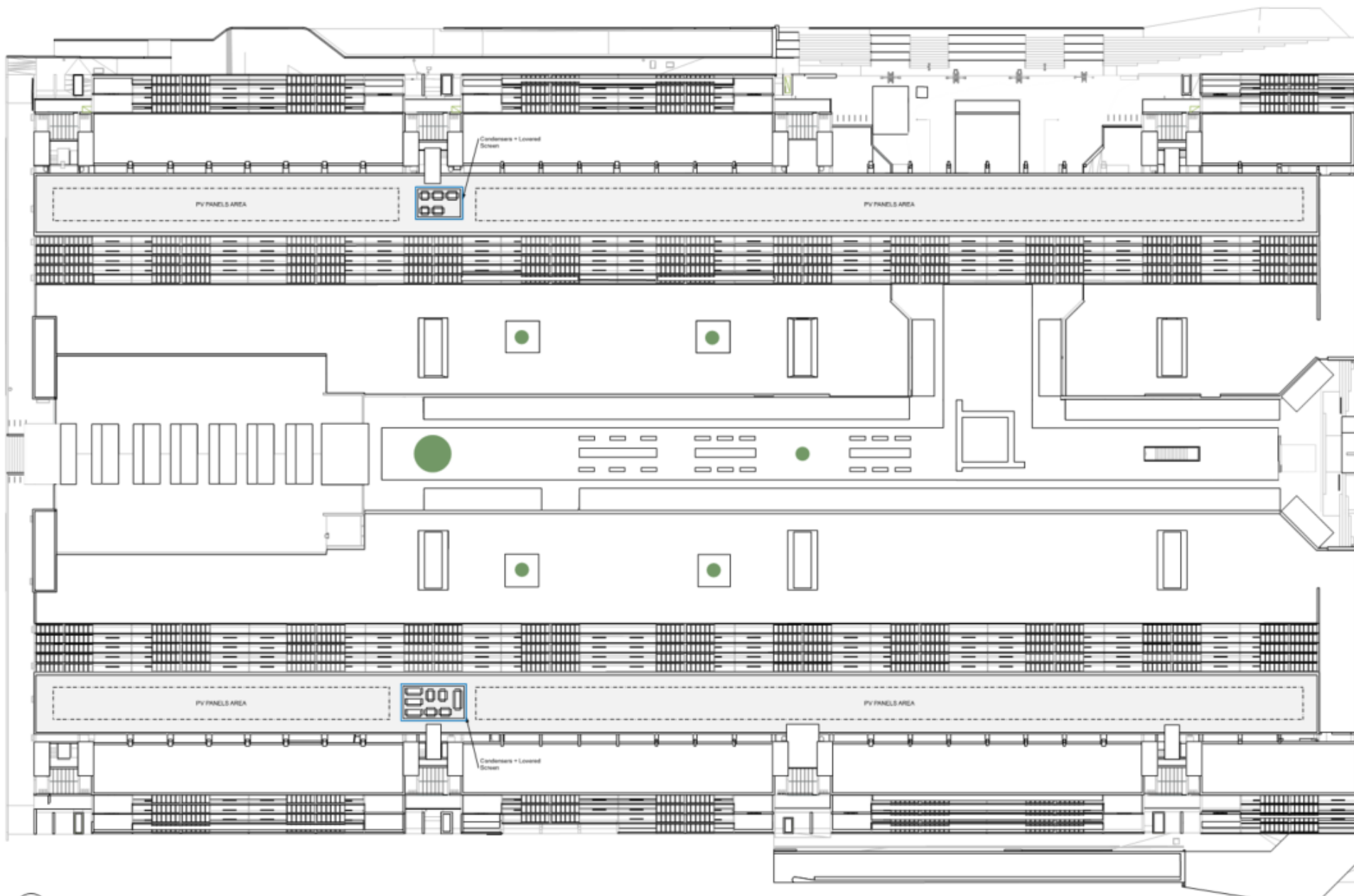








Existing Roof Plan
Scale: 1:250



Proposed Roof plan



View at entrance lobby



View at reception



View at reception



View at F&B area