

20 September 2023

**Submitted via Planning Portal (Ref: PP- 11725606)**

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

Dear Sir/ Madam

## **TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**

**1-11 GRAFTON PLACE, LONDON NW1 1DJ**

### **APPLICATION FOR FULL PLANNING PERMISSION – COVER LETTER AND HERITAGE STATEMENT**

We write to you on behalf of our client, BAE Systems Pension Funds Trustees Limited c/o La Salle ('the Applicant'), in relation to the enclosed application which seeks to secure full planning permission for replacing the existing building's external cladding at 1-11 Grafton Place, London NW1 1DJ in the London Borough of Camden ('LB Camden'). The proposed works are necessary to ensure the fire safety of the building's façade to remove potentially combustible materials. Consequently, planning permission is sought for the following development:

*"Replacement of external building cladding."*

The remainder of this letter describes the application site and its context, in addition to the further details of the proposals and the planning assessment of the proposed development.

### **THE SITE AND SURROUNDING AREA**

The site is a part four storey and part eight storey building and is partly occupied by Travelodge London Central Euston (Use Class C1) and is partly occupied by affordable/ key worker residential units (Use Class C3). The ground floor unit fronting on Eversholt Street is a retail unit (Use Class E). The site was redeveloped to erect the current building under planning permission ref. 2005/3864/P on 08 December 2005.

The site is at the junction between Grafton Place and Eversholt Street and is bounded by a residential block apartment (known as Wellesley House) to the north, Churchway to the east, Grafton Place to the south and Eversholt street to the west.

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Given that most of the southern part of the site is located within the Central Activities Zone (CAZ), the surrounding area is characterised by a mix of town centre uses (such as offices, retail, restaurants, bars, hotels and cultural venues).

Although the site itself is not located within a Conservation Area, the site is in close proximity to several Conservation Areas. The site does form the immediate boundary with the Bloomsbury Conservation Area to the south.

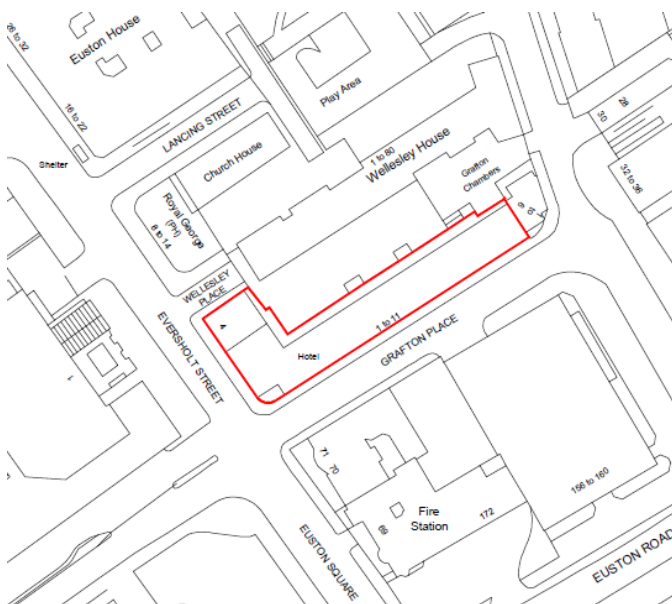
Furthermore, although the building itself is not listed, the site is in proximity to a number of listed buildings. This includes the Grade II Listed Royal George at 8-14 Eversholt Street (directly to the north of the site) and the Grade II\* Listed Euston Fire Station including boundary walls, gatepiers and railings at 172 Euston Road (approx. 50m to the south of the site).

The Environment Agency's online Flood Map indicates that the development site is located within Flood Zone 1. The site therefore benefits from a relatively low risk of flooding (i.e. the annual probability of a flood event is less than 1 in 1,000).

In terms of transport accessibility, the site has a PTAL Rating 6b (highest), with 0 representing the least accessible locations and 6b the highest, and therefore benefits from a very high standard of accessibility. According to the TfL's online WEBCAT Tool this is expected to remain at this level based on a forecast for 2031.

Euston Station is located directly adjacent to the west of the site and provides Underground (Northern and Victoria lines), Overground (services to Watford Junction) and National Rail services (Avanti West Coast, Caledonian Sleeper and West Midland Trains services).

Bus services run frequently from in front of Euston Station – the bus routes served include 18, 59, 68, 91, 253 and 390 and these include services to Hackney, Sudbury, West Norwood, Streatham Hill, Crouch End and Archway.



**Figure 1: Site Location Plan, prepared by Cumming Group**

## PROPOSALS

The proposals subject of this planning application seek to replace the existing cladding used in the façades of each of the building's elevations. This changes to the cladding are required as the existing panel material has been found to be combustible within the build-up from the sheathing board outwards in the copper cladding and the insulation of the render system.

For the avoidance of doubt, the external appearance of this cladding is not proposed to be changed, with materials of a like-for-like appearance selected.

In order to improve the building's fire safety, it is proposed to replace all the flammable materials with safer and more suitable materials. More specifically the following cladding system and materials are proposed:

Type	Existing Cladding System and Materials	Proposed Cladding System and Materials
EWS-01	Tecu copper rain screen cladding affixed to plywood sheathing board and timber battens.	Copper cladding to mirror existing stratigraphy. Copper cladding is to be affixed to metal decking, new mineral wool insulation will be installed within the cavity.
EWS-02	Insulated acrylic render incorporating combustible expanded polystyrene insulation.	Insulated acrylic render incorporating mineral wool insulation.
EWS-03	Powder coated composite spandrel panels incorporating combustible Styrofoam insulation.	Powder coated composite aluminium spandrel panels incorporating mineral wool insulation.

The proposed works are required to ensure that the building meets the requirements set out in the Fire Safety: Approved Document B (2022).

Further details of the proposed materials and their fire safety performance can be found in the submitted proposed drawings, supporting technical reports and accompanying Gateway One Fire Statement. No other works or alterations to the building are proposed as part of this planning application.

## PLANNING POLICY CONTEXT

### Development Plan

In accordance with Section 38(6) of The Planning and Compulsory Purchase Act 2004, the proposals must be assessed against the Development Plan and other material considerations. The adopted Development Plan for the site comprises:

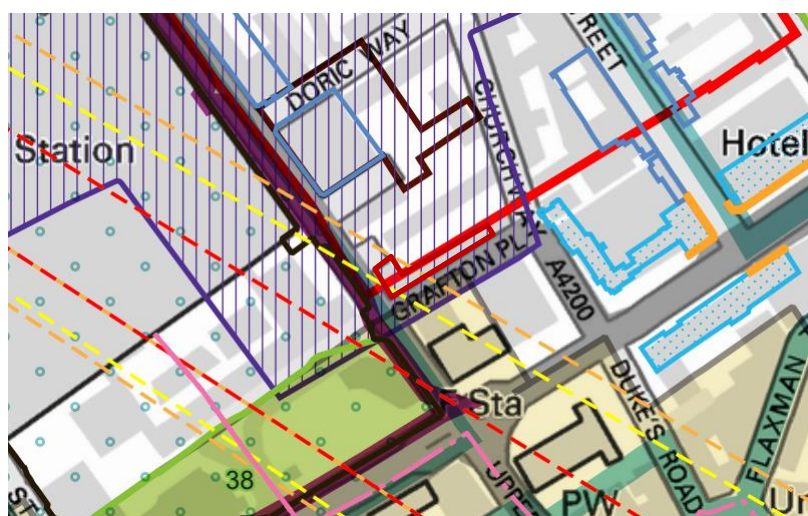
- London Plan (2021)

- LB Camden Local Plan (2017)
- LB Camden Policies Map (2021)
- Euston Area Plan (2015)

## Adopted Policies Map Designations

A review of the Camden Policies Map (2021) shows that the site has the following designations:

- Central London Area
- Transport Safeguarding Area



**Figure 2: Adopted Policies Map (2022) Extract (Approx. site boundary added in red by Turley)**

Other policy documents that are material to the consideration and determination of this application include Camden Planning Guidance (CPG), prepared by LB Camden, such as Design CPG (2021).

The Government's national planning policies for England are set out in the National Planning Policy Framework ('NPPF') (2023). Supporting the NPPF is the online national Planning Practice Guidance ('PPG' or 'NPPG') (2021), and the recently published National Design Guide (2019). This is also a relevant material consideration when assessing the site.

## HERITAGE STATEMENT

London Plan Policies HC1 and HC2 require development affecting heritage assets to conserve their significance, by being sympathetic to that significance and also their settings, and subsequently enhance heritage assets and architectural features that contribute towards local character.

Local Plan Policy D2 further notes that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and Listed Buildings. The Policy confirms the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset, unless the public benefits of the proposal convincingly outweigh that harm.

The proposed materials have been selected to closely follow both the colour and materiality of the existing building façade, therefore ensuring the overall appearance and design quality is retained. The use of comparable materials and colours will ensure the proposals preserve the character and appearance of the Conservation Area and the neighbouring heritage assets. On this basis the proposed development is considered to have a neutral affect on the setting of nearby Conservation Areas and are therefore considered to be in accordance with London Plan Policies HC1 and HC2, and Local Plan Policy D2.

## **PLANNING ASSESSMENT**

### **Design and Heritage**

London Plan Policy D3 (A) confirms all development must make best use of land by following a design-led approach that optimises capacity of sites. London Plan Policies D3 (D) further notes proposals are expected to respond to local context through their layout, orientation, scale, appearance, and shape, with buildings of a high standard of sustainable design and architecture whilst providing active frontages and achieving safe, inclusive environments.

Similarly at the local level, Local Plan Policy D1 confirms the Council will seek to secure high quality design in development and requires that development, inter alia: respects local context and character; and preserves or enhances the historic environment and heritage assets.

The proposals seek to replace the existing external cladding panels which comprise a mix of combustible expanded polystyrene and Styrofoam insulations. The proposals will therefore be replaced with new mineral wool insulation within the cavity which will improve the overall fire safety of the building to ensure it align with current building regulations and safety guidance.

The proposed materials have been selected to closely follow both the colour and materiality of the existing building façade, therefore ensuring the overall appearance and design quality is retained. The use of comparable materials and colours will ensure the proposals maintain the character and appearance of the building and local area. On this basis the design of the proposals are considered to be acceptable in accordance with London Plan Policy D3 and Local Plan Policy D1.

### **Fire Safety**

The proposals are supported by a Fire Statement, prepared by Fire Engineering Consultancy and produced in accordance with London Policy D12 which requires all development proposals to achieve the highest standards of fire safety for all buildings users. The Statement confirms the acceptability of the chosen replacement panelling and demonstrates that the appropriate materials have been chosen to minimise the risk of fire spread.

## **SUBMISSION DOCUMENTS**

This application for full planning permission is accompanied by the following documents:

- Application Forms and Certificates;
- Site Location Plan, prepared by Cumming Group;
- Existing and Proposed Elevations, prepared by Cumming Group, including:
  - Grafton Place Elevation

- Wellesley House Elevation
- Euston Square Elevation
- Churchway Elevation
- RIBA Stage 3 Plus Thermal Report, prepared by Maffis Engineering;
- RIBA Stage 3 Plus Structural Report, prepared by Maffis Engineering;
- RIBA Stage 3 Plus Detail Report, prepared by Maffis Engineering;
- RIBA Stage 3 Plus Survey Plan, prepared by Maffis Engineering;
- RIBA Stage 3 Plus Scope of Work Document, prepared by Maffis Engineering;
- Specification EWS-01, prepared by Maffis Engineering;
- Specification EWS-02, prepared by Maffis Engineering;
- Specification EWS-03, prepared by Maffis Engineering;
- Façade Risk Assessment, prepared by Maffis Engineering; and
- Completed Fire Statement Form, prepared by Fire Engineering Consultancy.

A payment for the requisite planning application fee of £298.00 has been made via the Planning Portal.

We trust the enclosed provides you with adequate information to progress and validate the application. We will be in touch shortly, but in the meantime, if you require any further information or clarifications, please contact me or my colleague Kinari Tsuchida ([Kinari.Tsuchida@turley.co.uk](mailto:Kinari.Tsuchida@turley.co.uk)) at these offices.

Yours sincerely



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