

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

14 February 2025

Our ref: NFR/HDA/FPL/U0026406

Your ref: PP-13719615

Dear Sir/ Madam

**Application for Full Planning Permission
Town and Country Planning Act 1990 (as amended)
Greater London House, Hampstead Road, London, NW1 ('the Site')**

We write on behalf of Lazari Properties 3 Limited ("the Applicant") to submit an application for Full Planning Permission for proposed refurbishment works at Greater London House, Camden, NW1 ('The Site'). The works comprise refurbishment works to improve the tenant offer onsite including improvements to the entrance sequence and rear of the Site, the creation of roof terraces and enhanced greening and biodiversity.

Full Planning Permission is therefore sought for:

"Improvements to the building entrance including replacement of ramp with stairs and lifts; relocation of existing cat statues; demolition of ancillary structures; provision of two new roof terraces as ancillary amenity space including new rooftop pavilions; relocation of PV panels; soft landscaping and associated works."

The Site

Greater London House (the former Carreras Cigarette Factory) was constructed between 1926 and 1928. The Hampstead Road elevation is in the Art Deco Egyptian Revival style and the Mornington Crescent elevation is of a less decorative, more functional aesthetic.

The Site is predominantly in office use. Two office floors at the 5th and 6th level were added on the Mornington Crescent side in the 1970s and infill extensions within the footprint of the building were brought forward in 2016. There is also an existing commercial gym currently occupied by Metabolic Gym at the southern end of the Site and a restaurant currently occupied by Azura at the northern end.

The Site is not listed but is located within the Camden Town Conservation Area. The Camden Town Conservation Area Appraisal identifies the Site as contributing positively to the wider Conservation Area as a focal building. Within the Camden Town Conservation Area, the Site is located within Commercial Sub Area 1.

The Site is located in close proximity to a number of listed buildings/structures including:

- Numbers 25-35 Mornington Crescent and Attached Railings (Grade II).
- Bollard outside 25 Mornington Crescent (Grade II).
- Numbers 13-24 Mornington Crescent and Attached Railings (Grade II).
- Animal Drinking Trough at Southern Junction with Hampstead Road (Grade II).
- Numbers 2-12 Mornington Crescent and Attached Railings (Grade II).
- Number 1 Mornington Crescent and Attached Railings.
- Numbers 261 and 263 Hampstead Road and Attached Railings (Grade II).
- Mornington Crescent London Railway Transport Station Including Features Underground (Grade II).

The site is well connected and benefits from the second highest Public Transport Accessibility Level of 6A.

Planning History

The relevant planning history for the Site to which this application relates is set out in the table below:

Ref.	Description of Development	Status
Entrance		
PE9700121	Alterations to the front elevation and forecourt area of the building comprising: the erection of a new glazed canopy over each of the main and two side entrances; the reinstatement of statues on either side of the entrance; the refurbishment of the existing decorative pillars to the front elevation; the installation of replacement windows from elevation; the creation of a new access road from Hampstead Road; the provision of full wheelchair access to the main entrance.	Approved 16 June 1997
PE9700606	Alteration to previously approved development dated 16 June 1997 (ref. PE9700121R1) comprising changes to the proposed staircases between ground and basement levels on the Hampstead Road elevation.	Approved 03 October 1997
2015/4945/P	Removal of existing entrance doors and canopy, new circular sliding entrance doors, and modifications to pedestrian ramp and external steps.	Approved 24 November 2015
2016/1265/P	Non-material amendment involving the replacement of stone paving on external steps and landing with anthracite limestone, to planning permission reference 2015/4945/P (dated 24/11/15) for removal of existing entrance doors	Approved 09 March 2016

	and canopy, new circular sliding entrance doors, and modifications to pedestrian ramp and external steps.	
Terrace		
2008/0747/P	Retention of two sets of double doors to provide access to a flat roof at rear fifth floor level and timber decking and planter boxes on the roof, all to facilitate use of the roof as a terrace in connection with the existing offices (Class B1).	Approved 12 May 2008 This permission relates to a roof terrace at fifth floor level at the rear of the Site fronting Mornington Crescent.
2008/3193/P	Replacement of window with French doors at fifth floor level fronting Mornington Crescent to allow access to roof terrace (retrospective).	Approved 04 September 2008 As above.
2022/0705/P	Refurbishment of existing external terrace at rear fifth floor level including replacement decking, erection of pergolas, alterations to external wall, replacement of windows with doors and installation of new access doors.	Approved 31 August 2022 As above.

Proposals

The proposals seek a series of refurbishment works at Greater London House to improve the Site's arrival experience and amenity offer for tenants. Greater London House is a key employment site acting as a connecting node between Euston and Camden. The Site has capacity to accommodate approximately 4,000 employees each day but that the occupancy levels of the Site have reduced since the Covid-19 pandemic.

The proposals therefore seek to provide enhanced amenity space through the creation of a more welcoming and accessible entrance sequence into the building and ancillary office space at roof level.

In summary, the proposed works comprise:

- The replacement of a car ramp at the entrance of the Site with a contemporary staircase and improved wheelchair accessibility via two new lifts.
- The minor repositioning of the cat statues to better frame the entrance sequence.
- The provision of additional rooftop amenity space located at fifth floor level.
- The provision of additional rooftop amenity space located at sixth floor level.
- Enhanced landscaping and improved biodiversity at roof level.
- Demolition of ancillary structures at lower ground floor level of the eastern frontage of the Site and enhanced landscaping.

- Improvements to the rear of the Site including enhanced greening.

Pre-Application Discussions

A pre-application meeting was held on site to discuss the proposed works at Greater London House on the 5th of November 2024 under reference (2024/3947/PRE). Outlined below is a brief summary of Officers' formal response on the proposed refurbishment works. Overall, Officers were supportive of the proposals in principle subject to further detail and clarifications.

Creation of roof terrace

The Officer's response to the proposed works confirmed that the works would enhance the roof's current deteriorated condition whilst providing an enhanced tenant amenity offer. The relocation of the existing PV panels was supported, as well as the use of planting to increase on site biodiversity and urban greenery. As part of this, it is envisaged that planting proposals will be covered by a pre-occupation planning condition and that a detailed planting design will be prepared at the detailed design stage and submitted for approval.

Refurbishment of the main entrance, the outdoor seating area, along with landscaping work and the relocation of the platform lift.

The Officer considered that the proposed works will enhance the accessibility of the building but queried the dimensions of the proposed lift. Officers also initially requested that a backup wheelchair ramp should be provided alongside the platform lift to guarantee continuous access for wheelchair users in the event that the lift fails to operate. Dimensions of the proposed lift were submitted to Officers via email on 06 November 2024 and subsequently to this, a second lift has been incorporated into the design. The Applicant Team have also clarified to Officers that it is not possible to build a backup wheelchair ramp due to the change in levels. The current ramp is non-compliant and is currently accessed by a platform lift i.e. to get to the ramp, you must use a lift. This is because the rise is too high to install a compliant ramp. It was recommended by Officers that the installation of the lifts be screened by the newly re-positioned cat statues to minimize their impact on the streetscape. This has been incorporated into the proposals.

Officers considered that the tiered planting proposed on either side of the steps would enhance the overall aesthetic of the office building. The creation of outdoor seating on the ground floor level for office occupiers was also supported.

Officers considered that the provision of the decorative railing at rooftop level and the new staircase, particularly on the primary front elevation, would not harm the visual relationship with the adjoining properties at Mornington Crescent. Officers request that any boundary treatment for the roof utilises materials similar to the existing white aluminium railing to minimise the visual impact on the building and nearby Grade II listed buildings. Officers considered that the scale of the roof terrace would ensure that the balance of the building's façade and the surrounding streetscape is protected. Officers noted that alterations like these have the potential to elevate the character and appearance of the area, both individually and cumulatively, and are therefore supported from a design and heritage perspective.

Amenity

Officers agreed that the proposals will not affect existing daylight or sunlight levels in neighbouring properties, nor will they alter the outlook from the rear of these properties or contribute to noise or light pollution. Additionally, the proposals are not expected to result in any loss of privacy or create

an overbearing presence as a result of the positioning of the proposed roof terraces towards Hampstead Road.

Biodiversity Net Gain

Officers requested clarification on whether the proposals would trigger the statutory requirement to provide 10% Biodiversity Net Gain (BNG). A Preliminary Ecological Assessment is submitted in support of this application which demonstrates that the proposals would not impact on a habitat of 25sqm or more or a priority habitat and is therefore exempt from the statutory BNG requirement. Notwithstanding this, the proposals will significantly increase biodiversity and greening on site.

Transport

Officers requested confirmation on the impact of the proposals on delivery, servicing and waste management. As set out in further detail below, the proposals will result in the infilling of the existing crossovers onto the pavement but will otherwise have no impact on delivery, servicing and waste management which will continue as per the existing situation. Officers noted that the Applicant must be prepared to contribute towards necessary highways improvements in the local area including the submission of a Construction Management Plan, Implementation Support Contribution and a Support Bond to ensure impacts on local infrastructure area appropriately managed during the construction process.

Flood Risk

Officers initially requested that a Flood Risk Assessment is submitted in support of the application. The Applicant subsequently confirmed that no works were proposed to deepen or increase the width of the basement and as such, a Flood Risk Assessment would not be required. This was agreed with Officers via email on 17 December 2024.

Conclusion

Officers considered that the Proposed Development, including the refurbishment of the main entrance and creation of roof terraces to provide additional ancillary office accommodation, would be generally in keeping with the character of the existing building and the surrounding Camden Town Conservation Area.

Officers outlined that the modest scale of the changes, including the use of appropriate materials and a detailed design that replicates the original period features, suggests that the visual integrity of the area would not be significantly affected.

Officers stated that the proposal raises no significant concerns regarding amenity, and the setback and boundary treatment will adequately screen the seating area from nearby sensitive receptors.

Officers confirmed that, overall, subject to the comments described above, the Proposed Development is likely to be considered acceptable in principle.

Planning Policy Assessment

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.

Planning policy operates at national, regional, and local levels. At a national level Central Government published the National Planning Policy Framework (“NPPF”) in December 2024. The Statutory Development Plan for the Site comprises the:

- London Plan (adopted March 2021); and
- Camden Local Plan (adopted January 2017)

Camden Council are in the process of preparing a new and updated Local Plan. In order to inform the development of this new Local Plan, the Council held a call for views from 4 November 2022 to 13 January 2023. The Council consulted on the draft new Local Plan from 17 January to 13 March 2024. We understand that the emerging Local Plan is anticipated to be adopted in Summer 2026.

The Local Development Scheme published in October 2022 confirms that the adopted Local Plan continues to hold full weight in planning decisions.

National Legislation

Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 sets out the statutory duty imposed on the decision maker in considering whether to grant planning permission for the development within a conservation area, which states that special attention shall be paid to the desirability or preserving or enhancing the character or appearance of a conservation area.

Design and Heritage – Policy

At the regional level, London Plan Policies D1 to D3 apply to the design and layout of the development and set out a range of urban design principles relating to the quality of the public realm, the provision of convenient, legible movement routes and the importance of designing out crime.

Policy D5 of the London Plan states that development proposals should achieve the highest standards of accessible and inclusive design and that proposals should deliver high quality people focused spaces, which are convenient and welcoming with no disabling barriers.

Policy HC1 (Part C) of the London Plan outlines that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.

At a local level, Policy D1 of the Camden Local Plan seeks to secure high quality design in development and to ensure that new developments are attractive, safe, and easy to use.

Policy D1 sets out the characteristics LB Camden expect to secure high-quality development proposals, including those which, inter alia, are sustainable in design and construction, are inclusive and accessible for all and which maximise opportunities for greening whilst preserving strategic and local view.

Policy D2 of the Camden Local Plan states that it requires that development within Conservation Areas to preserve or, where possible, enhance the character or appearance of the area. Supporting text at paragraph 7.16 of the Camden Local Plan states that “any adaptation of existing buildings must respond to access needs whilst ensuring that alterations are sympathetic to the building’s character and appearance.”

Supporting Paragraph 7.18 of the Camden Local Plan states that design should create safe and attractive places and be designed to prevent crime and antisocial behaviour.

The Camden Town Conservation Area Appraisal outlines that the Conservation Area retains many diverse historic rooflines which it is important to preserve. Fundamental changes to the roofline, insensitive alterations, poor materials, intrusive dormers, or inappropriate windows can harm the historic character of the roofscape and will not be acceptable.

Design and Heritage – Assessment

The proposals seek to carry out refurbishment works to the existing building to deliver high-quality office amenity space and a welcoming and accessible entrance sequence. The proposals seek to maintain and enhance the Site's Art Deco Egyptian Revival Style decoration, thereby ensuring the Site continues to contribute positively to the wider Camden Town Conservation Area.

The current entrance sequence is unwelcoming, and its configuration makes it vulnerable to anti-social behaviour. The proposed reconfiguration seeks to remove the existing car-centric design and reframe the entrance through the minor repositioning of the existing Egyptian cat statues. In line with Camden Policy D1, wheelchair accessibility will be improved compared to the existing situation which comprises a non-compliant ramp which is only accessible by means of a lift. The proposals therefore seek to provide a wheelchair accessibility from ground level with a second back up lift in the event of lift failure.

The provision of additional rooftop amenity space at fifth and sixth floor level will provide high-quality ancillary amenity space to benefit the office occupiers in addition to providing enhanced urban greening and biodiversity opportunities. Further greening will be provided at Lower Ground Floor to enhance the existing offer.

KM Heritage, the Applicant's appointed Heritage Advisor, has identified five key townscape views against which to assess the proposals from a townscape perspective. These views are primarily from the south and east looking towards the Site. KM Heritage consider that meaningful views from the north or west would be non-existent given the nature and location of the changes proposed. The assessed views are therefore primarily from the south and east looking towards the Site. As demonstrated in the Design and Access Statement, the proposed pavilion is only marginally visible from the majority of identified views.

The central pavilion will be most visible when viewed from the east across Harrington Square Gardens (view 2), however, this type of clear view would only be obtained in deep winter condition from this specific location, and even then, would be screened by the branches and trunks of the mature trees set around the perimeter of the gardens. Where the pavilion is seen, KM Heritage consider the effect will be wholly positive. The design responds sensitively to the existing architecture, both in terms of scale and form, employing a modern interpretation of the palmiform motifs used on the building's main elevation directly below.

On this basis, KM Heritage consider that the proposed development will support and sustain the contribution that the building makes to the character and appearance of the Camden Town Conservation Area as well as to the setting of heritage assets located in proximity to the site. In so doing it satisfies S.66(1) and S 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It is also consistent with the heritage policies of the National Planning Policy Framework, the London Plan and the Camden Local Plan.

Further details of the Heritage impact can be found within the heritage section of the Design and Access Statement submitted as part of this application for Full Planning Permission.

Accessibility Policy

London Plan Policy D5 outlines that development proposal should achieve the highest standards of accessible and inclusive design including providing high-quality, people-focused spaces and allowing buildings to be entered, used and exited safely, easily and with dignity for all.

Camden Local Policy D1 (Part G) outlines that developments are required to be inclusive for all.

Accessibility Policy Assessment

The proposed development seeks to enhance the accessibility to the building for all users, through a series of minor adjustments to the entrance sequence and roof.

The proposed roof terrace will have level access through the introduction of a platform lift, which will be designed to be concealed within the steps to allow wheelchair access to the pavilion. Level access is then provided between the pavilion and the external terrace area. There will also be disabled refuge call points provided on each terrace in close proximity to the fire escape stairs. Also, the 6th floor pavilion is proposed to contain two DWCs, in addition to the existing 2 found with the core. Lastly, the existing lifts which serve 6th floor are DDA compliant.

In respect of the ground floor entrance, at current the access is poor with the one existing ramp which is not DDA-compliant and is only accessible by means of a platform lift. Consequently, as part of the proposed plans the ramped access will be removed. Instead, two disabled access lifts will be provided to serve both disabled occupants. In the event of system failure, the availability of a second lift ensures continued access. To enhance security, the access lifts will be gated at street level, with call points provided for visitor access.

Sustainability – Policy

London Plan Policy SI2, which principally relates to major development, supports the provision of renewable energy sources to contribute to the decarbonisation of the existing building stock.

Policy CC1 (Climate Change Mitigation) of the Local Plan requires developments to meet the highest feasible environmental standards.

Sustainability Policy Assessment

The proposed development seeks to provide additional office amenity space at roof level through the creation of roof terraces and associated pavilions. In order to do so, a number of existing lightwells are required to be removed and their PV panels relocated. To further improve the performance of the building, additional PV panels are proposed. It is calculated that the total PV provision will produce 6.4 kWp total capacity load, which would equate to a reduction in carbon emissions of approximately 2,330 kgCo2 per year.

The proposals accord with relevant regional and local planning policy and are therefore acceptable in principle.

Biodiversity – Policy

London Plan Policy G3 states that developments should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

Local Plan Policy A3 requires applications to be assessed against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development which are proportionate to the scale of development proposed.

Biodiveristy Policy Assessment

As part of their formal Pre-Application Response, Officers requested confirmation on whether the proposals would be exempt from the statutory requirement to deliver 10% Biodiversity Net Gain. A Preliminary Ecological Assessment has been prepared by TLP which demonstrates that the proposals would not impact an existing habitat of greater than 25sqm or a priority habitat and are therefore exempt from the statutory requirement to deliver 10% Biodiversity Net Gain on this basis.

Notwithstanding this, the proposals introduce planting and greening where possible to enhance the physical environment and provide new habitats and biodiversity improvements to the area. The proposed planting scheme will also include a variety of nectar-rich flowering plants as well as fruiting and berrying species from rooftops, tree canopies to shrub and ground cover levels. In addition, the green roof areas (intensive and extensive) will help to slow surface water run-off as well as reduce the heat island effect. Decorative uplighting is also proposed to be incorporated, where appropriate, to illuminate small trees and vertical greening.

It is envisaged that planting and lighting details will be covered by suitably worded planning conditions to be submitted to the LPA for approval as required.

Consequently, whilst the proposals are exempt from the statutory requirement to deliver 10% Biodiversity Net Gain, the proposed alterations to the roof terrace and rear landscape would create a substantial increase in the greening of the building, aligning with the policy of the Camden Local Plan and the London Plan.

Amenity - Policy

London Plan Policy D14 outlines that proposals should avoid significant adverse noise impacts on health and quality of life.

Policy A1 of the Local Plan states that the Council will seek to protect the quality of life of occupiers and neighbours.

Amenity Policy Assessment

As agreed with Officers at Pre-Application Stage, the proposals will not affect existing daylight or sunlight levels in neighbouring properties, nor will they alter the outlook from the rear of these properties or contribute to noise or light pollution. Additionally, the proposals are not expected to result in any loss of privacy or create an overbearing presence and therefore are in line with Local and London Plan Policy. In respect of noise, the proposed roof terrace has been positioned to front Hampstead Road and away from the residence at the rear of the site to protect residential amenity, and will be managed in line with the existing and approved roof terrace located to the west of the Site.

Transport - Policy

London Plan Policy T7 states that developments proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.

Local Plan Policy T1 (Prioritising Walking, Cycling and Public Transport) of the Local Plan states that the Council will support the use of sustainable transport modes including walking, cycling and public transport.

Transport Policy Assessment

There are no proposed alterations to the rear of the Site that will alter or impact the existing delivering, servicing and waste management procedures to the site. The scope of works to the rear of the Site comprise the provision of additional greening to screen the servicing yard. As a result, a Transport Assessment is not required to be submitted in support of this application.

The proposals will result in the infilling of the existing crossovers onto the pavement but will otherwise have no impact on highways. In their formal Pre-Application Response, Officers noted that the Applicant must be prepared to contribute towards necessary highways improvements in the local area including the submission of a Construction Management Plan, Implementation Support Contribution and a Support Bond to ensure impacts on local infrastructure area appropriately managed during the construction process. The Applicant is willing to discuss and agree this with Officers during the determination period.

Basement Impact – Policy

Policy A5 (Basements) of the Camden Local Plan states that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm.

Basement Impact Policy Assessment

The proposed works do not include any widening or deepening of the existing basement or any alterations to the basement level, only the removal of the cluttered external portacabins at Lower Ground Floor. Therefore, it has been confirmed by the Case Officer via email that neither a Basement Impact Assessment nor a Flood Risk Assessment will not be required as part of this application.

Overall, the proposed works align with regional and local planning policy and are therefore acceptable in principle on this basis.

Documentation

On the basis of the above, and in addition to this cover letter, the following documentation is submitted in support of this pre-application request:

- Site Location plan, prepared by DMFK;
- CIL form, prepared by Newmark;
- Cover Letter, prepared by Newmark ;
- Existing, Demolition and Proposed Plans, Sections and Elevations, prepared by DMFK;
- Design and Access Statement, prepared by DMFK;
- Landscape Statement, prepared by TLP;
- Preliminary Ecological Assessment, prepared by TLP.

The application fee of £1242.00 (including the £70.00 Planning Portal fee) has been made concurrently with the submission.

We trust that the above is acceptable for the purposes of the registration and validation of the pre-application and look forward to confirmation of receipt and validation in due course. Please do not hesitate to contact Nia Fraser (0207 333 6299), Hannah Davies (0207 333 6221) or Flossie Plowden (0203 486 3790) of this office should you have any questions in the meantime.

Yours faithfully

A handwritten signature in black ink that reads "Newmark Gerald Eve LLP". The signature is written in a cursive, slightly slanted style.

Nia Fraser
Partner

Nia.Fraser@nmrk.com
Direct tel. [+44 207 333 6299](tel:+442073336299)
Mobile. [+44 795 769 1616](tel:+447957691616)