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London Borough of Camden
Planning Department
5 Pancras Square
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4 March 2025

Our ref: NDA/SHIN/HSC/U0028939

Your ref: PP-13784517

Dear Sir/ Madam,

**184-192 Drummond Street, London, NW1 3HP
Application for Full Planning Permission
Town and Country Planning Act (As Amended) 1990**

We write on behalf of our client, British Land Plc ('the Applicant'), to submit a full planning application for the proposed development at 184-192 Drummond Street, London, NW1 3HP (the 'Site').

The proposal includes external works to the ground floor level of 184-192 Drummond Street to improve the building's relationship with the street and its energy efficiency.

A full planning application has been submitted via the planning portal, for the following works:

"Installation of new bin store enclosure, creation of new entrance with level access and replacement of existing glazing on west elevation at ground floor level of 184-192 Drummond Street."

Further details on the proposals are set out within this letter and the drawings and Design and Access Statement, prepared by Arup.

The Site

The Site consists of a 5-storey office building (plus basement) at the corner Longford Street, Drummond Street and Stanhope Street within the London Borough of Camden (LBC).

The Site is not statutorily listed however it is locally listed. The building was added to the Camden Local List due to its architectural and townscape significance. The description confirms it is an "*Early to mid 20th century office building on corner of Drummond Street and Stanhope Street. Of 5 storeys, in stock brick with horizontal linear bands of windows creating a striking street presence and clearly marking this corner site.*"

Directly to the north of the site is the Grade II listed Lord Nelson Public House (No.48) and adjacent to this are the Grade II listed terraces (Nos. 50 & 52). The Site is not located within or adjacent to any Conservation Areas.

The Site is an approx. 5min (0.2) mile walk from Warren Street Underground Station and an approx. 6min (0.3) mile walk from Great Portland Street Underground Station. The Site has a PTAL rating of 6b (best).

The Site sits in an area of varied development with a mixture of uses and building heights, scales and styles.

The Site has the following designations:

- Central London Area (CLA);
- Protected Vistas LVMF 2010 – View 2A.2: Parliament Hill summit to the Palace of Westminster;
- Euston Area Plan; and
- Central Activities Zone (CAZ).

The Site is also located within Flood Zone 1.

Planning History

Following a review of Camden's Planning Register, relevant planning history is set out below.

On 14th March 2017, Full Planning Permission (ref. 2016/5677/P) was granted for:

“Installation of a new entrance door on corner of Drummond St and Stanhope Street; opening up of front lightwells and installation of walk-on cast iron pavement lights; removal of plant from rear enclosed area and creation of an amenity area, installation of 2 x replacement condenser units at roof level. Installation of a new entrance door on corner of Drummond St and Stanhope Street; opening up of front lightwells and installation of walk-on cast iron pavement lights; removal of plant from rear enclosed area and creation of an amenity area, installation of 2 x replacement condenser units at roof level.”

The Planning Register confirms the land use at the time of this application as B1a Business – Office. The Existing and Proposed Ground Floor Plan also annotate the space as in 'Office' use.

On 24 March 2011, Full Planning Permission (ref. 2011/0279/P) was granted for:

“Installation of a single condenser unit on the flat roof of the office building.”

On 25 April 2003, Full Planning Permission (ref. PEX0200629) was granted for:

“Change of use of basement from storage (Class B8) to a dual use of business (Class B1), and the use of the ground floor for business (Class B1) and or storage and distribution (Class B8) as amended by letter dated 11th March 2003.

Informative: The dual use permission gives flexibility of use for 10 years from the date of this permission. After 10 years the lawful use would revert to whichever of the use is taking place at the time and if it is Class B1 then planning permission would be required to change to Class B8 or vice versa.”

On 28 April 2002, Full Planning Permission (ref. PEX0200674) was granted for:

“Change of use of basement from storage (Class B8) to a dual use of business (Class B1), and the use of the ground floor for business (Class B1) and or storage and distribution (Class B8) as amended by letter dated 11 March 2003. As shown on drawing numbers: A3/P1922/(E)0, A3/P122/(E)/1, A3/P1922/(P)0 and A3/P1922/(P)/1.

Informative: The dual use permission gives flexibility of use for 10 years from the date of this permission. After 10 years the lawful use would revert to whichever of the use is taking place at the time and if it is Class B1 then planning permission would be required to change to Class B8 or vice versa.”

based on the above evidence in the planning history, and that no conditions or legal agreements restricting the use have been found and has been in B1 use since 2003, we understand the ground floor level is in lawful Use Class E use.

Proposals

British Land are seeking to carry out external works to the ground floor level of 184-192 Drummond Street to improve the building’s relationship with the street and improve its energy efficiency.

The proposed description of development is as follows:

“Installation of new bin store enclosure, creation of new entrance with level access and replacement of existing glazing on west elevation at ground floor level of 184-192 Drummond Street.”

The proposals are set out in further detail as follows:

1. **New access/entrance** – there are two existing access points on the west elevation. The new entrance is proposed to be located between the two existing access points and provide direct access into the centre of building, compared to the two existing access points which step down into the space. Creating access to the centre of the floor plate will improve tenant experience and access to the building. The new entrance will feature a solid black timber door with black powder coated metal frame with glazing.
2. **Consolidated bin enclosure** - The existing bin storage is informal and consists of bins enclosed with movable barriers, creating clutter on the pavement. The proposal seeks to consolidate the existing on street bin storage by introducing a permanent burnished metal structure with similar materiality to the proposed entrance.
3. **Replacement glazing** – the proposal replaces the existing glazing on west elevation with double glazing. Please refer to the west elevation drawing. The replaced glazing would not only improve building energy efficiency, but also the internal condition of the space.

The proposals offer an opportunity to improve both internal floorspace and the general streetscape around the building by adding a new level access point, consolidating the street side bin enclosure, and replacing the existing glazing on the west elevation.

Full details of the proposals are set out within the Design and Access Statement, prepared by Arup.

Planning Policy Context

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.

The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:

- The London Plan (2021); and
- The London Borough of Camden's Local Plan (2017).

The National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) are material considerations.

LBC consulted on the draft new Local Plan from 17 January to 13 March 2024. currently considering all the responses received and will publish an updated version of the Local Plan for further consultation later this year. The Local Plan will in time replace the current Camden Local Plan (2017) and Site Allocations Plan (2013). At the time of writing, the emerging Local Plan carries no weight in planning terms and accordingly, has not been assessed as part of this application.

The relevant policy background and considerations are set out below.

Design

London Plan Policy D3 also states that development should 'enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions'.

Camden Local Plan Policy D1 states that the Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character;
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d. is of sustainable and durable construction and adaptable to different activities and land uses;
- e. comprises details and materials that are of high quality and complement the local character;
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- g. is inclusive and accessible for all;
- h. promotes health;
- i. is secure and designed to minimise crime and antisocial behaviour;
- j. responds to natural features and preserves gardens and other open space;
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- l. incorporates outdoor amenity space;
- m. preserves strategic and local views;

- n. for housing, provides a high standard of accommodation; and
- o. carefully integrates building services equipment.

The new entrance will feature a solid black timber door with a black powder coated metal frame and glazing that ties in with the existing windows. As a result, the entrance proposals will respect the local context, preserve the heritage asset, and comprise materials which complement the local character in accordance with criteria a), b) and e) of Local Plan Policy D1.

The new entrance proposal will create level access into the building thus improving tenant experience and accessibility of the space in line with criteria g) of Local Plan Policy D1 which seeks to ensure development is inclusive and accessible for all.

The consolidated bin store will improve upon the existing informal arrangement by introducing a permanent solution to waste management with the store being constructed from a similar material to the proposed entrance in line with e) of Local Plan D1. The enclosed bin store will reduce pavement clutter and provide opportunities for planting in line with criteria k) of Local Plan Policy D1 which seeks to incorporate landscaping.

The intention for the replacement glazing on the west elevation is to use the same materiality and layout as the existing façade. The replacement glazing also responds to sustainability requirements and will assist in improving the buildings energy efficiency.

Overall, the proposals have been sensibly designed and meets the overall objectives of London Plan Policy D3 and Local Plan Policy D1 creating accessible commercial space which is attractive to potential occupiers.

Heritage

In relation to non-designated heritage assets, Camden Local Plan Policy D2 states that the Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares. It adds that the effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

The Site is not statutorily listed however it is locally listed. The building was added to the Camden Local List due to its architectural and townscape significance. Directly to the north of the site is the Grade II listed Lord Nelson Public House (No.48) and adjacent to this are Grade II listed terraces (Nos. 50 & 52).

A Heritage Statement has been prepared by KM Heritage which assesses the proposed scheme and its possible effect upon the heritage significance and townscape character of the surrounding context.

The Heritage Statement sets out the effect of the proposal upon the setting of the adjacent designated heritage assets will be positive. It adds that their heritage significance will be safeguarded, sustained and enhanced.

The Heritage Statement also confirms the proposed scheme will have a positive effect upon townscape quality adding visual interest and reinforcing the Locally Listed building's contribution by virtue of a careful and contextually appropriate design.

The Heritage Statement makes clear that the proposal will preserve the special architectural or historic interest of nearby Listed buildings by preserving and enhancing their setting. The Statement summaries the proposed development is consistent with heritage policies of the National Planning Policy Framework, the London Plan, and the Camden Local Plan.

Highways

Camden's Streetscape Design Manual states that there are guidelines for maintaining 'clear footway' widths for different volumes of traffic:

- 1.8 metres – minimum width needed for two adults passing.
- 3 metres – minimum width for a bus pedestrian street, though greater widths are usually required.

The existing bin storage is informal and consists of bins enclosed with movable barriers, creating clutter on the pavement. The proposed bin store will have an extremely limited impact on the footway and a 2850mm footway is maintained. The proposed width goes beyond the 1.8m requirements. This is not a busy street thus the 3m requirement is not applicable however the clearance is only 150mm off this requirement.

Economy

Camden Local Plan Policy E1 states that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for residents and businesses. The proposal will improve tenant experience and increase the value of the space.

Summary

The proposals offer the opportunity to improve the existing office building and the general streetscape. The proposals seek to improve, preserve and enhance the character of the locally listed building. It is considered that the proposals accord with relevant National and Local planning policy and should therefore be granted.

Application Documents

The requisite fee of £363.00 has been paid online via the planning portal. The following documents are submitted in support the planning application:

- Application Form, prepared by Newmark;
- Design and Access Statement, prepared by Arup;
- Drawings, prepared by Arup; and
- Heritage Statement, prepared by KM Heritage.

If you have any questions regarding the application, please do not hesitate to contact Sophie Hinton (Sophie.Hinton@nrmk.com) or Hannah Scott (Hannah.Scott@nrmk.com) at this office

NEWMARK

Yours Sincerely

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