

Henry Yeung Development Management Camden Town Hall Judd Street WC1H 9JE

Date: 11th April 2025

Dear Henry,

Objection to Planning Application Reference: 2025/0912/P - Greater London House, Hampstead Road, London, NW1 7QX

We are instructed on behalf of our Client, the British Heart Foundation (hereinafter 'our Client'), to submit representations in relation to planning application ref. 2025/0912/P at Greater London House.

Under application ref. 2025/0912/P proposals include a variety of internal and external works to the existing Site at Greater London House, Hampstead Road, London, NW1 7QX ('the Site').

Our Client is, in principle, supportive of the Applicant's efforts to enhance the existing building but raises an objection to the current proposal submitted under planning application reference ref. 2025/0912/P due to potential impacts on the operation of their business as outlined below.

This letter should be read alongside representations submitted in relation to application ref. 2025/0685/P.

Additionally, we would highlight that Knight Frank has been instructed to act on behalf of both the British Heart Foundation and ASOS Ltd, who each occupy premises within Greater London House. Separate representations have been submitted on their behalf to address the specific concerns and priorities relevant to each tenant.

Background

The Client

The British Heart Foundation have been a tenant of Greater London House since November 2008, occupying the fourth floor of the building for office use.

The Application

A planning application has been submitted by Lazari Properties 3 Limited for a variety of proposed works to the existing Site. The application seeks planning permission for:

"Improvements to the building entrance, including replacing the existing ramp with stairs and lifts; relocating the cat statues; demolishing ancillary structures; creating two new roof terraces for amenity use, including rooftop pavilions; repositioning PV panels; introducing soft landscaping; and carrying out associated works."

It is understood that the applicant has engaged in limited consultation with our Client. While preliminary discussions concerning potential works to the building were held with the Client in January 2025, the information provided regarding the scope of the proposed works was minimal. Since that time, no further details have been supplied prior to the submission of



application ref. 2025/0912/P. Consequently, there has been a distinct lack of meaningful engagement, leaving our Client inadequately informed, unclear about the potential impacts on their operations and unable to provide any constructive input on the final design.

Objections

Inadequate Access

Upon reviewing the submitted documentation, it is understood that the proposed improvements to the Site's entrance include the replacement of the existing accessibility ramp (which is also currently used for deliveries) with a larger staircase, alongside enhanced wheelchair accessibility via two new lifts. From reviewing documents submitted as part of the application, it is understood that these lifts will serve for both disabled access and delivery services.

It is considered that the absence of a designated disability lift, coupled with the potential usage patterns of the lifts by other tenants, presents a potential risk that both lifts could be in use continuously and simultaneously, to the detriment of individuals with physical disabilities. In such an instance, if a person arrives at the building and both lifts are occupied, with at least one of these due to deliveries, they would be unable to access the building and would be required to wait until a lift becomes available.

Therefore, we respectfully request that consideration be given to the provision of an alternative delivery access route to ensure continuous disabled access, either through amendments to the currently submitted plans or by securing this through an appropriately worded planning condition.

Construction Impacts

Considering the scope of works proposed under this planning application, we respectfully request that due consideration be given to the potential construction-related impacts, including site movements, dust and noise on our Client's on-going operations.

Given the nature of our Client's business, these disruptions could have a significant adverse effect on their day-to-day activities.

To mitigate such impacts, we request the inclusion of a planning condition as part of a future permission to ensure that appropriate measures are implemented to safeguard our Client's operations during the construction phase. These measures may include (among others) restrictions on working hours, dust suppression techniques and noise abatement strategies, all of which would serve to minimise operational disruption.

It is requested that both the Construction Phase Plan and the Construction Logistics Plan (or any other relevant documentation) be made available for review by the British Heart Foundation prior to their approval.

Fifth Floor Terraces

The creation of the fifth-floor terrace area will have a direct impact on the Client's meeting rooms and office space at the mezzanine floor, by completely blocking natural light to these areas.

This issue was briefly raised during a previous tenant meeting in January 2025, where the idea of introducing electric panels to replicate natural light in place of the existing glass panes was suggested. However, no further details or specifications regarding these panels have been provided since that discussion or prior to submission of this application.

Additionally, a large proportion of the Client's demise will be situated beneath the fifth-floor terrace as part of the proposed plans, which is also where lightwells currently exist. The removal of these lightwells will have a significant impact on the working environment, it is therefore essential a solution is devised to address to this issue, either through appropriate amendments to submitted plans..

Given that the Client occupies the 4th floor, there are also concerns regarding potential noise pollution originating from the terraces above, particularly given the extended operating hours proposed for these.



Lack of Engagement

Paragraph 131 of the National Planning Policy Framework ('NPPF') emphasises that the creation of high-quality, beautiful, and sustainable buildings is fundamental to the planning and development process. It highlights that good design is a key aspect of sustainable development, creating better places to live and work and making development more acceptable to communities. Policy stresses that clear design expectations and effective engagement between applicants, communities, local planning authorities and other stakeholders throughout the process are essential for achieving these outcomes.

Furthermore, Paragraph 137 explains that design quality should be considered throughout the evolution of proposals. It is noted that early engagement between applicants, the local planning authority and the local community about the design and style of emerging schemes is essential to align expectations and balance local and commercial interests. Policy also notes that applicants must also work closely with those affected by their proposals to ensure that the designs evolve in response to community feedback.

There has been limited consultation with our Client. While preliminary discussions concerning potential works to the building were held with the Client in January 2025, the information provided regarding the scope of the proposed works was minimal. Since that time, no further details have been supplied prior to the submission of the application. As a result, there was a clear lack of meaningful engagement, leaving our Client uninformed, unclear of the potential impacts to their operations and unable to provide input on the final design. The design of the proposed development has a direct impact on the Client's use of the premises, and the absence of any meaningful consultation with the Client undermines the design process, especially considering the potential operational disruptions and concerns that could have been addressed through early engagement.

Given this lack of consultation prior to submission of Application Ref. 2025/0912/P, it is evident effective stakeholder involvement has not been undertaken in the design process in accordance with requirements set out in the NPPF.

Summary

As stated above, our Client is, in principle, supportive of the Applicant's efforts to enhance the existing building under application reference 2025/0912/P. However, there is potential for the proposals to detrimentally impact our Client's significant business operations at the Site. As required by the NPPF, effective engagement to ensure good design and align expectations is essential and we do not consider that this application has sufficiently satisfied this requirement.

We therefore request that this application be assessed with full consideration of its potential impacts upon the British Heart Foundation, as an operational tenant of the building. Additionally, we would request an opportunity for the British Heart Foundation to review the final application prior to its determination, ensuring that all concerns are adequately addressed.

Specifically, we request that the relevant plans and documents be amended to address the concerns raised before the application is determined. Alternatively, if amendments are not possible, we request that any relevant additional details be approved by way of condition attached to the planning permission if granted.

As noted previously, Knight Frank have been instructed to act on behalf of both the British Heart Foundation and ASOS Ltd, who each occupy premises within Greater London House. Separate representations have been submitted on their behalf to address the specific concerns and priorities relevant to each tenant.

Please do not hesitate to contact myself or my colleague Niki Walia the above further.

if you would like to discuss

Yours sincerely,

Sarah Hiscutt

Partner