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

30 May 2025 Our ref: NFR/HDA/FPL/U0026406 Your ref: PP-14042208

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 the proposed reconfiguration of the existing lightwells to provide amenity space at Greater London House, Camden, NW1 ('The Site').

Full Planning Permission is therefore sought for:

"Creation of paved terraces at third floor level within the existing North and South lightwells, including seating, planting, creation of new access doorways, and other 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).

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- 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		
2016/4208/P	The construction of 3 storey infill extensions at upper ground, 1st and 2nd floor levels within the open air atrium of the building to create an additional 3,897m ² of office floorspace (B1a); the removal of the existing redundant bridge link structures; associated facilities at lower ground level; the addition of plant at roof level and cycle parking.	Approved 26 October 2016
2017/2792/P	Details of solar PV equipment and green roof as required by conditions 7 and 8 of 2016/4208/P dated 26/10/2016 (for 3 storey infill extensions, an additional 3,897m ² of office floorspace (B1a), plant and associated works).	Approved 12 June 2017

Proposals

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 maximise and upgrade the Site in order to provide an improved offering for the building's tenants. The Applicant has reviewed the condition of the existing lightwells and considers that the space could be better utilised. As such, it is proposed to reconfigure the existing lightwells to provide ancillary office amenity space.

The existing lightwells are topped by a green roof which was secured via an approval of details application (ref. 2017/2792/P). As part of the works, part of these green roofs will be removed to provide amenity space and additional, biodiverse planting will be incorporated to enhance the space and offset any loss of green roof.

In summary, the proposed works comprise:



- Reconfiguration of the existing North and South lightwells at third floor;
- Introduction of seating and planters to provide amenity space and biodiversity; and
- New doorways in window bays to provide access to each terrace.

Further detail is set out in the Design and Access Statement prepared by Forme UK and submitted in support of this application.

Pre-Application Discussions

A pre-application meeting was held on Site to discuss the proposed works at Greater London House on 5 November 2024 (ref. 2024/3947/PRE). Outlined below is a brief summary of Officers response on the lightwells works.

The Officer confirmed that "the use of planting is generally supported, as the proposal will increase on-site biodiversity and urban greenery. The proposed lightwell area would not be visible from any public viewpoint, and these upgrades are welcomed to improve the employment environment for office users." It was also outlined by Officers that the proposals could be secured via a Non-Material Amendment (NMA) application, which was subsequently submitted.

Consultation Comments

Following this, consultation comments have prompted an updated approach to securing the proposals. As agreed with Officers, this application for Full Planning Permission will replace the withdrawn NMA (ref. 2025/0685/P).

This submission includes adjustments to the scope of works submitted under the NMA in response to consultation responses received from the Building Occupiers. The proposed amenity space at fourth floor of the North and South Lightwells has been removed from the scope of works and an Operational Management Plan is submitted in support of this application. It is understood that these adjustments resolve the concerns raised by Building Occupiers.

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.

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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 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."

Design and Heritage – Assessment

The proposals seek to carry out refurbishment works to the existing building to deliver high-quality office amenity space and enhanced greening on Site. The provision of additional amenity space at the third floor of the existing lightwells will provide high-quality ancillary amenity space to benefit the office occupiers in addition to providing enhanced urban greening and biodiversity opportunities.

From a design and heritage perspective, the reconfiguration of the internal lightwells would have no impact on the wider Conservation Area or any neighbouring listed buildings by virtue of their location within the footprint of the building, thereby maintaining the character of the Conservation Area in line with Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990.

The proposals therefore accord with relevant planning policy and legislation in respect of design and heritage.

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.

Biodiversity Policy Assessment

A Biodiversity Net Gain Assessment has been prepared by the Landscape Partnership and is submitted in support of this application. The assessment confirms that the, despite the loss of some



existing green roof, the Proposed Development, including high-quality planting, will achieve a Biodiversity Net gain score of 142.16%, thereby exceeding the minimum statutory 10% requirement and adhering to Policy G3 of the London Plan and Policy A3 of the Local Plan. It is anticipated that the Biodiversity Net Gain will be secured via a suitably worded planning informative in line with similar schemes in Camden.

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

The proposals will not result in any amenity impacts on neighbouring properties due to their enclosed location within the footprint of Greater London House. Furthermore, the terrace areas will be only accessible to Office tenants. In respect of noise, the proposed third floor terraces will be managed in regard to hours of usage which can be found within the Operational Management Plan submitted 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 application for Full Planning Permission:

- Site Location plan, prepared by Forme UK;
- Completed application form (PP-14042208);
- Completed CIL Form;
- Design and Access Statement, prepared by Forme UK;
- Proposed, Section and Elevation Drawings, prepared by Forme UK;
- Landscape Statement, prepared by TLP;
- Preliminary Ecological Assessment, prepared by TLP; and
- Operational Management Plan.

The application fee of £383.00 (including the £85.00 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 preapplication 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

Newmark Gerald Eve LLP

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