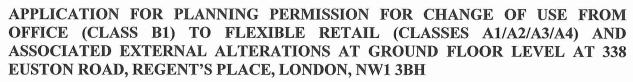
RPW/DF/DP3774

15 January 2015

Development Management Camden Town Hall Extension Argyle Street London WC1H 8EQ

For the attention of Gavin Sexton

Dear Gavin,



We write on behalf of our client, 338 Euston Road Limited (a wholly owned subsidiary company of The British Land Company Plc), to formally submit a full planning application via the Planning Portal in relation to the above site, for the following description of development:

'Change of use from office (Class B1) to flexible retail (Classes A1/A2/A3/A4) and associated external alterations at ground floor level'

The application comprises of the following documentation:

- Completed application form;
- The requisite application fee for £385.00 (paid online);
- CIL Planning Application Additional Information Requirement Form;
- Planning, Design and Access Statement set out in this Covering Letter below; and
- Application drawings as per the attached Drawings Schedule.

Site Description and History

No.338 Euston Road forms part of British Land's (BL) Regent's Place Estate – a locally important commercial estate comprising a number of headquarter office buildings and other uses. The estate is bounded by Euston Road to the south, Osnaburgh Street to the west, Longford/Drummond Streets to the north and Hampstead Road to the east. No. 338 is located on the north side of Euston Road towards the south of the estate.

The site is situated within the 'Central London Area' (London Plan Central Activities Zone) as shown on the London Borough of Camden's Local Development Framework Policies Map 2014. The building is not in a Conservation Area, is not statutorily or locally listed and does not adjoin any listed buildings. It was originally built in the 1960s and in 1988 underwent a full refurbishment.



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More recently BL has made a number of adjustments to the ground floor of the building – these have been linked by a common theme, namely to optimise the beneficial use of the building and to improve the contribution it makes to the wider estate.

- In 2007 planning permission was granted for improvements to the office entrance which forms the southernmost part of the ground floor footprint. This achieved a substantial enhancement of the main office reception.
- In 2008 planning permission was granted for conversion of the northernmost part of the building to provide a two storey retail unit at ground level (and void above). Permission was granted for flexible use under classes A1/A2/A3/A4. This unit was subsequently used as a temporary marketing suite.
- A planning application has recently been submitted for this northernmost element to also allow temporary office use. The proposal will allow an existing tenant of the estate, Facebook, to use this part of the building as a seminars and events space. The application has been registered by Camden's Planning Department under the reference 3878228.

The proposal subject of this new application affects the central part of the ground floor footprint, located between the southern office reception (subject of the 2007 permission) and the northern two storey space (subject to the 2008 permission and current application ref 3578228).

The Proposed Development

The proposal affects only the ground floor area, as shown on the application drawings, and extending to 230 sq m.

This part of the building is currently configured as support areas for the principal office use at No 338 Euston Road – being laid out to provide storage, back of house ancillary office areas, comms room and wcs. These spaces are not required by the office tenants of the upper floors and will be vacated by the end of May 2015.

The proposal is to introduce active uses by providing:

- A retail space spanning across the full width of the building. This space could be subdivided to provide two retail units, as shown on the application drawings. Indeed, the proposed design will allow division in a number of ways, providing flexibility for future tenants. The relationship of these units to the pedestrian thoroughfare to the east which forms an important part of the public realm works at Regent's Place will be reinforced by the introduction of new shopfronts. These will provide for access to the units and glazing for display/merchandising.
- A smaller kiosk unit (converted from the space currently occupied by the wcs), also with frontage to the east side of the building, and also with a new shopfront.

Flexibility is required for the units to be open from 07.00 to 23.00 hours, similar to other retail and theatre uses on the estate.



Design and Access

The existing facades at the ground floor level largely consist of a framed curtain wall system broken down into a large number of small window units. This offers very little in terms of visual interest to passers by. Replacement facades were installed in several bays when the works referred to above were undertaken to the southern office reception and to the north of the building in 2007/2008. The current proposal includes a replacement façade treatment to three further bays on the east side of the building to serve the new retail shopfronts. New façades are also proposed at two bays on the west side of the building to allow rear access. A further two bays on the west side will be replaced so as to provide a consistent design treatment at ground level – these will serve the retained office reception, which is to be subject to some changes in terms of interior layout, to further enhance the office entrance and reception

The new facades will replace the existing curtain wall system at ground floor level only. Existing column casings will be retained and a new base-loaded structural silicon glazed curtain wall system to match the newer elements of glazing will be installed within the newly created ground floor openings.

The new retail frontages will accommodate accessible entrances, a signage zone and louvre area for venting.

Planning Policy Considerations

The proposed introduction of retail uses is considered to be highly appropriate in this location and will meet the objectives of Development Plan policies.

- Camden Core Strategy policy CS3 for 'Other highly accessible areas' states that the Council will promote appropriate development in the designated Central London area (which includes Regent's Place). This is considered to be a suitable location for a range of uses including shops, food, drink and office uses.
- Core Strategy policy CS9 'Achieving a Successful Central London' confirms that the Council will support and promote the Central London area as a successful and vibrant place to live in, work in and visit. The policy supports Central London as a focus for growth of a variety of land uses including shops.
- Core Strategy policy CS7 promotes successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors. This includes providing for a range of shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice.

Policies also seek to secure a strong economy in Camden. The more detailed Development Policy, DP13, indicates that the Council will generally seek to retain land and buildings that are suitable for continued business use. In this case, the proposed change of use will affect only a small part of the ground floor of 338 Euston Road. The upper floor offices are not affected. Indeed, this element at ground floor is quite separate from the office floorplates above and is currently under-used, with no beneficial role to play in support of the office use on the upper



floors. It is isolated from the office activities within the building and offers no realistic prospect of being successfully let as a small standalone office suite.

BL has therefore given close consideration to how this part of the ground floor might be put into active use. The introduction of retail uses would provide an opportunity to reinforce the continued activation of ground floor frontages across the estate and, importantly, the route into the estate from the pedestrian crossing on Euston Road along the east side of the building.

It is envisaged that the northern unit of 338 Euston Road will be converted to retail/restaurant use in the longer-term, to further reinforce this route and activate the building frontage, once the space is no longer required for office use by Facebook (see Site Description and History above).

In addition to introducing new market and affordable apartments, BL has, over the last ten years developed major new office buildings at 10 and 20 Triton Street, and 10 and 30 Brock Street totalling in excess of 700,000 sq ft. The latest estimate is that approximately 15,000 people work and live at Regent's Place.

A vital aspect of this recent successes has been the focus on public realm and new amenities – this is a continuously evolving aspect which is subject to regular review by BL. A recent survey undertaken by ZZA Consulting highlighted many positives but also indicated the scope for improvements to the public realm and amenity, including a more varied retail offer across the estate.

The vacant back office area at the ground floor of 338 Euston Road represents a valuable opportunity to add to the retail facilities at the estate. Conversion to retail use would:

- provide improved services to residents, workers and visitors; and
- create an enhanced, enlivened frontage in stark contrast to the current inactive facades.

Since the reduction to office floorspace is only 230 sq m, and since the main office use of the building will continue, we believe the conversion to retail will not conflict with any of the objectives of the Council's planning policies. Indeed, by improving the overall attractiveness of the building to office occupiers, the proposal will meet the Council's policy to reinforce the local economy and support commercial business uses.

The retail units will also, of course, offer new job opportunities for local people with a range of skills and so will result in increased employment by comparison to the existing underused accommodation.

We trust you will find this application to be acceptable, both in terms of the principle of introducing the retail use, and the hours of operation set out above.



We look forward to receiving confirmation of validation of the application and would ask you to contact Dan Fyall at the above office if you require any further information.

Yours faithfully,

OPG Ltd

DP9 Ltd.

Encs.