

23 September 2022
Delivered via Planning Portal (PP-11561313)

Ref: BUPL3010

London Borough of Camden
Planning – Development Control
5 Pancras Square
London
N1C 4AG

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) REGULATIONS 2007 (AS AMENDED)

GROUND FLOOR UNIT FRONTING HAMPSTEAD ROAD, THE LANTERN, 75 HAMPSTEAD ROAD, LONDON, NW1 2PL

APPLICATION FOR FULL PLANNING PERMISSION AND CONSENT FOR THE DISPLAY OF ADVERTISEMENTS

On behalf of our client, Bupa Occupational Health Limited (hereafter: 'the Applicant'), we hereby submit an application seeking full planning permission and consent for the display of advertisements to London Borough of Camden ('LB Camden'), in its role as Local Planning Authority ('LPA'), in respect of the above site for the following proposed development:

"External alterations to ground floor unit; comprising installation of replacement louvres and replacement glazed 2no. entrance doors, together with installation of 1no. internally illuminated fascia signage (0.45m x 0.45m x 0.04m) and 1no. internally illuminated fascia signage (0.3m x 2.9m x 0.04m) fronting Hampstead Road."

THE SITE

The site lies at the junction of Hampstead Road and Drummond Street within the LB Camden, just north of Euston Road, west of Euston Station and to the east of Regents Park. The development (known as 'the Lantern') was permitted under planning permission ref. 2017/3518/P on 09 March 2018 to provide a ground plus 7 storey building containing office (E(g)(i)), flexible office/healthcare (E(g)(i)/ E(e)), retail (E(a)), cafe (E(b)) and 17 residential (C3) units.

Following the grant of the original permission, an application (ref. 2018/0663/P) was made under Section 73 of the Town and Country Planning Act 1990 (as amended) for a variation of Condition 2 (Approved Plans), to demolish 60% of the existing primary structure (as opposed to 30% previously approved) and to

Brownlow Yard
12 Roger Street
London
WC1N 2JU

 [turley.co.uk](https://www.turley.co.uk)

"Turley is the trading name of Turley Associates Limited, a company (No. 2235387) registered in England & Wales. Registered office: 1 New York Street, Manchester M1 4HD."

increase the overall height of the building by 450mm. This minor material amendment application was granted subject to a Section 106 Legal Agreement on 02 July 2018. Please see below for the full site planning history.

The proposals subject of this application relates to the external elevation of the existing Ground Floor unit on Hampstead Road, which is permitted as Class E (restricted to (a - retail) and (e - medical/health services)) under the previous planning permission ref. 2022/2805/P (please see below). The proposals will enable the occupation and operation of the unit as a health clinic.

The building is not listed and does not lie within a Conservation Area, nor are there any listed buildings or Conservation Areas immediately adjacent to the building. The site lies within the Euston Area Action Plan which divides the Euston area into six character areas; the site is within the Regent's Park Estate Character Area.

The site is located within Flood Risk Zone 1 (the lowest risk) and is not located within the Green Belt.

In terms of transport accessibility, the site has a PTAL Rating 6b (highest), with 0 representing the least accessible locations and 6b the highest, and therefore benefits from a very high standard of accessibility. According to the TfL's online WEBCAT Tool this is expected to remain at this level based on a forecast for 2031.

The site is located close to London Euston Railway, Overground and Underground Station is located approx. 450m to the east of the site, serving Avanti West Coast, Caledonian Sleeper, West Midlands Trains, as well as Northern and Victoria lines. In addition, Euston Square Underground Station (serving Circle, Hammersmith & City and Metropolitan lines) is located approx. 300m to the southeast, whilst Warren Street Underground Station (serving Northern and Victoria lines) is located approx. 240m to the south of the site. A number of bus routes run along Hampstead Road itself including 24, 27, 29 and 134.

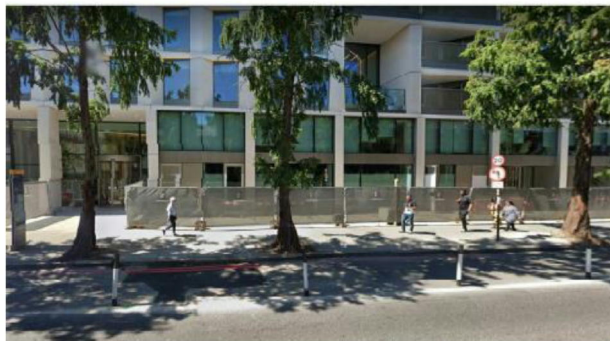


Figure 1: Google Streetview of the ground floor unit (Source: Google)

SITE PLANNING HISTORY

LB Camden granted planning permission (ref. 2017/3518/P) for the following development on 09 March 2018 for:

"Extensive internal and external refurbishment of Stephenson House to provide a ground plus 7 storey building containing 16,709sqm (GIA) of office (B1) floorspace, 904sqm (GIA) of flexible

office/healthcare (B1/D1) floorspace, 857sqm (GIA) of retail (A1) floorspace, 118sqm (GIA) of cafe (A3) floorspace and 17 residential (C3) units (total 2,296.8sqm GIA), comprising 11 market units (1x1 bed, 6x2 bed, 4x3 bed) and 6 affordable units (3 x2 bed and 3x3 bed). The works include the removal of existing colonnade to Hampstead Road elevation, creation of double height entrance on Hampstead Road, multiple storey extensions and infills to the building, creation of three terraces to the rear, three integral pocket gardens to the Hampstead Road elevation and balconies facing Hampstead Road to all residential units. Addition of PV panels to the roof, 249 commercial cycle parking spaces, 33 residential cycle parking spaces, 4 disabled car parking spaces and associated landscaping and works”.

Following the grant of the original permission, an application for minor material amendments (ref: 2018/0663/P) under Section 73 of the Town and Country Planning Act 1990 (as amended) to planning permission 2017/3518/P was approved on 2 July 2018 for:

“Variation of condition 2 (approved plans) of 2017/3518/P dated 08/03/2018 (for extensive refurbishment of building and extensions to create 16,709sqm office, 904sqm flexible office/healthcare, 857sqm retail, 118sqm café and 17 residential units (including 6 affordable) and associated works (summary)) namely to demolish 60% of the existing primary structure (as opposed to 30%) and to increase the overall height of the building by 450mm.”

This was recently followed by a change of use application to facilitate Bupa’s occupation of unit (alongside the change of use of the other units within the building) by the Landlord directly, and has been granted under ref. 2022/2805/P on 04 August 2022 for the following development:

“Change of use of the Class A1 (retail) ground and lower ground floor units on Hampstead Road to Class E (restricted to (a - retail) and (e - medical/health services)) and change of use of the flexible Class B1/D1 (office/community) ground floor unit on Drummond Street to Class E (restricted to (a - retail) and (b - food and drink)).”

PROPOSALS

The proposals seek full planning permission and advertisement consent for the replacement of the existing louvres (above the ground floor windows) and minor external alterations to the Hampstead Road façade comprising the installation of new replacement external entrance doors and dedicated entrance signage. More specifically, the description of the development is as follows:

“External alterations to ground floor unit; comprising installation of replacement louvres and replacement glazed 2no. entrance doors, together with installation of 1no. internally illuminated fascia signage (0.45m x 0.45m x 0.04m) and 1no. internally illuminated fascia signage (0.3m x 2.9m x 0.04m) fronting Hampstead Road.”

Proposed Louvres

Given the permitted use of the unit as a health clinic (Use Class E(e)), new louvres and louvre panels are required to provide sufficient air intake and exhaust for the ventilation strategy of the unit.

It is therefore proposed to remove the existing band of louvres and replacing with 2no. comparably designed louvres, which have greater air permeability levels to improve air flow and ventilation. This will be further supported by enlarging the surface area of louvres to extend above the two entrance doorways the works are required as part of the wider fit out and conversion of the unit for occupation as a health clinic.

Proposed Entrance Doors

The proposed replacement entrance doors will comprise a new glazed automatic sliding door for the main customer entrance (ensuring improved access), and an inward opening glazed hinged door for the secondary entrance, which would predominantly be used by staff (replacing the current door which is hinged to open out onto the street). The new doors are intended to match the materiality and appearance of the existing doors on Hampstead Road.

Proposed Entrance Signage

The proposals also include 2no. internally illuminated fascia signage (subject of this application), as well as internally applied window vinyl at the main customer entrance (which would benefit from deemed consent)¹.

This Covering Letter should be read in conjunction with the supporting Design and Access Statement (DAS), together with the existing and proposed plans and drawings, prepared by Lusted Green.

PLANNING POLICY CONTEXT

In accordance with Section 38(6) of The Planning and Compulsory Purchase Act 2004, the proposals must be assessed against the Development Plan and other material considerations. The adopted Development Plan for the site comprises:

- London Plan (2021);
- LB Camden Local Plan (2017); and
- Euston Area Plan (2015).

Other policy documents that are material to the consideration and determination of this LBC application include Camden Planning Guidance (CPG), prepared by LB Camden. This includes the following (not an exhaustive list):

- Advertisements CPG (2018)
- Design CPG (2021)

The Government's national planning policies for England are set out in the National Planning Policy Framework ('NPPF') (2021). Supporting the NPPF is the online national Planning Practice Guidance ('PPG' or 'NPPG') (2021), and the recently published National Design Guide (2019). This is also a relevant material consideration when assessing the site.

PLANNING ASSESSMENT

Principle of external alterations to support the unit as a health clinic (Use Class E(e))

London Plan Policy S2 emphasises the Mayor's support for the delivery of high-quality new and enhanced health and social care facilities to meet identified need.

¹ As defined by Schedule 3, Part 1, Class 12 of the Town and Country Planning (Control of Advertisements) Regulations 2007.

Local Plan Policy C1 promotes strong, vibrant and healthy communities through ensuring a high-quality environment with local services to support health, social and cultural wellbeing. Camden recognises the need for medical centres within Central London and supports the addition of these facilities.

The proposals are required to support the operation of the ground floor unit as a health clinic (with the use of the unit already permitted under permission ref: 2022/2805/P). The proposals will ensure the Applicant can offer a new class leading level of care to local residents in the Borough and other Londoners. The proposals are thus considered to be acceptable in principle in line with London Plan Policy S2 and Local Plan Policy C1.

Design

London Plan Policy D3 (A) confirms all development must make best use of land by following a design-led approach that optimises capacity of sites. London Plan Policies D3 (D) further notes proposals are expected to respond to local context through their layout, orientation, scale, appearance, and shape, with buildings of a high standard of sustainable design and architecture whilst providing active frontages and achieving safe, inclusive environments.

Similarly, Local Plan Policy D1 states development should secure high quality design which respects and complements the local context and character, is sustainable in design and construction, and contributes positively to the street frontage.

Local Plan Policy D4 is specific to advertisements and requires advertisements to preserve or enhance the character of their setting and host building. Advertisements must respect the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail. The Council's Advertisements CPG provides further advice on the design and siting of advertisements to ensure they contribute positively to the appearance and character of an area.

External Alterations

The proposed louvre panels will replace and replicate the existing band above the ground floor windows. It is therefore considered that the scale of the proposed louvres will be subordinate to the existing building, whilst providing sufficient air volume and flow requirements associated with the health clinic use. Further, in terms of materiality, the new louvres will match the materiality and appearance of the existing bronze decorative panels, to ensure the original design approach and overall appearance and character of the external façade fronting Hampstead Road is sustained. Accordingly, the proposed louvres are considered to be in accordance with London Plan Policy D3 and Local Plan Policy D1.

The proposed entrance will include a new automatic sliding door for the main customer entrance, and an inward opening hinged door for the secondary staff entrance. This element of the proposal will deliver a visually attractive new glazed entrance and frontage, improving visual permeability, legibility and accessibility to the unit from the street. The new doors have been designed to match the materiality and appearance of the existing doors, which comprises bronze metal framed glazed units. This will ensure the overall design and appearance of the external ground floor façade on Hampstead Road is maintained, in accordance with London Plan Policy D3 and Local Plan Policy D1.

Proposed Signage

New external fascia signage will be installed which will help to enhance the entrance and frontage of the unit. The signage proposal has been designed to incorporate the use of a high-quality acrylic signage and soft illumination carefully aligning with Bupa's design approach across comparable healthcare clinics within its portfolio. The scale of the signage proposed is considered proportionate to both the unit and

wider Lantern Building, and will improve legibility and wayfinding for future users, without having an overbearing impact on the host building. The proposals are therefore considered to be in accordance with London Plan Policy D3, Local Plan Policies D1 and D4, and the Advertisements CPG.

In summary, it is considered that the proposed works are of a minor scale and will not result in any detrimental impact on the character and appearance of the existing building and its surrounding context, whilst critically allowing the future occupation of the unit by Bupa as a new health clinic within the Borough. Overall, the proposals are therefore considered to fully accord with London Plan Policy D3 and Local Plan Policies D1 and D4, and the Advertisements CPG.

Noise

London Plan Policy D14 confirms development proposals should seek to reduce, manage and mitigate noise impacts.

Similarly, Local Plan Policy A4 states the Council will seek to ensure that noise and vibration is controlled and managed. The Policy notes that planning permission will only be granted for noise generating development, including any plant and machinery, if it can operate without causing harm and minimise impact to local amenity.

To support this application, a Background Noise Survey Report is currently being prepared by Ramboll. The Report will incorporate the results of the baseline noise survey are considered suitable for setting louvre noise rating limits. Rating noise limits are set so that noise will not have an adverse impact or a significant adverse impact (BS4142) and to meet the policy requirements set out in the Local Plan.

It is expected that a suitable noise rating level from the louvres should be at least 10 dB below the lowest measured representative background level (LA90), meaning that noise limits will be around 48-50dB at the receptors which is not particularly onerous for the day. This will ensure the proposals are in compliance with London Plan Policy D14 and Local Plan Policy A4.

SUBMISSION DOCUMENTS

The application was submitted via the Planning Portal under reference PP-11561313. This application for full planning permission and display of advertisements is accompanied by the following documents in addition to this Cover Letter, Application Form, Completed CIL Form and Legal Notices:

- Site Location Plan, prepared by Lusted Green;
- A suite of Existing and Proposed Drawings, including Floor Plans, Elevations, Sections; prepared by Lusted Green;
- Design and Access Statement, prepared by Lusted Green; and
- Background Noise Survey Report, prepared by Ramboll (to be submitted w/c 26 September 2022).

A payment for the requisite planning application fee of £398.20 has been made via the Planning Portal.

We trust the enclosed provides you with adequate information to progress and validate the application. We will be in touch shortly, but in the meantime, if you require any further information or clarifications,

Turley

please contact my colleague Samuel Brown [REDACTED] or myself at these offices if you have any queries.

Yours sincerely

[REDACTED]

Kinari Tsuchida
Assistant Planner

[REDACTED]