



Our ref: SM/Endsleigh Court
Planning Portal ref: PP-11420188

London Borough of Camden
Planning - Development Control
Camden Council
Camden Town Hall
London
WC1H 8ND

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25th October 2022

Dear Sir/Madam,

Endsleigh Court, 24 Upper Woburn Place, London, WC1H 0HA
Application for a Certificate of Lawful Existing Use or Development (CLEUD)

We write on behalf of our client, LKB Investments Limited, to submit an application for a Certificate of Lawful Existing Use or Development (CLEUD) for the use of the existing ground floor and lower ground floor as residential (C3 Use Class). This application is submitted under Section 191 of the Town and Country Planning Act 1990.

A Supporting Statement has been prepared which provides full background on why we believe that the lawful use of the ground floor and lower ground floor is Use Class C3. In summary, the Statement concludes that comprehensive and clear evidence has been submitted in support of the Application. The evidence demonstrates beyond any reasonable doubt (less still on the balance of probabilities) that:

- (i) the Existing Use did not, and does not, require the grant of planning permission because it is not 'development' within the meaning of the Act;
- (ii) in any event, the Existing Use is, and has been for a period of at least four years (and, indeed, considerably in excess of ten years too), a use within Use Class C3 such that no enforcement action has been, nor can be, taken by the Council in respect of the Existing Use; and
- (iii) therefore, the Existing Use is lawful within the meaning of the Act.

The application package includes the following documents:

- Completed application form
- 1:1250 Site Location Plan (with the site outlined in red)
- Statutory declaration of Paul Lamper including Appendices:
 - Exhibit A – Site Plan



- Exhibit B – Detailed floorplans (drawing numbers 0497 (18) 100 and 0497 (18) 099)
- Exhibit C – Existing Condition Report (dated June 2022)

For clarification, the application fee of £1,848.00 has been paid online by electronic payment.

We look forward to receiving notification that the application has been validated. If you have any queries in the meantime, please contact Stefanie Mizen of this office on 0203 147 1815 or at Stefanie.Mizen@jll.com.

Yours faithfully,

Stefanie Mizen

Stefanie Mizen
Director – Planning and Development
JLL