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N1C 4AG

14<sup>th</sup> March 2024

Via Planning Portal  
Ref. PP-12822566

Dear Alex,

**CAMDEN ROAD HOSTEL, 248-250 CAMDEN ROAD, LONDON, NW1 9HE**  
**NON-MATERIAL AMENDMENT TO PLANNING PERMISSION 2020/3737/P**

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We write to you on behalf of our client, London Borough of Camden c/o Morgan Sindall Construction and Infrastructure Limited (the 'Applicant'), to apply for a Non Material Amendment to planning permission reference 2020/3737/P pursuant to Section 96A of the Town and Country Planning Act 1990 (as amended) in respect of the above site, Camden Road Hostel, 248-250 Camden Road, London NW1 9HE (the 'Site'). The approved description of development is outlined below:

*Redevelopment of the site to include demolition of existing hostel building and the erection of a new 4-6 storey plus basement hostel building (sui generis use) with external stairwell and rear balconies to all levels; erection of 2 x single storey garden buildings; associated works including installation of plant equipment, parking and access arrangements and tree and landscaping works. (Information for the purpose of consultation: the proposed development provides 39 units, which comprise 36 x studios, 2 x 1-beds and 1 x 1-bed wheelchair accessible unit).*

This application proposes a series of physical amendments to the exterior of the approved scheme, as well as amendments to the wording of approved conditions. These changes have been the subject of informal pre-application discussions with officers at the London Borough of Camden in October 2023, where it was agreed that a Non Material Amendment (Section 96A) application would be an appropriate means of bringing these changes forward.

Condition 2 attached to the master planning permission states all the approved planning drawings and application documents that the development must be carried out in accordance with. This application seeks to amend these approved drawings to allow these changes, as well as amending the wording of one additional condition affecting the internal layout of the Site. A list of the approved drawings and those submitted in support of this application are set out in the table in Section A below.

In support of this application, the following documents are enclosed:

- Cover Letter
- NMA Design Document;
- Planning Drawings; and
- Planning application fee - £357 paid via the Planning Portal

## **a. Overview of Proposed Amendments**

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This is a Section 96A Application (S96A) for Non Material Amendments pursuant to Condition 2, which refers *inter alia* to approved drawings, as well as the wording of Condition 4 (Accessible Unit), of the existing granted permission LPA Ref: 2020/3737/P dated 11<sup>th</sup> May 2021.

When considering a proposal for a non-material amendment, due regard must be given to the relevant National Planning Practice Guidance (NPPG); and S96A of the Town and Country Planning Act (1990) (as amended).

A S96A application allows applicants to submit non-material amendments to an existing planning permission, providing that it is clear that the amended proposals do not result in any changes to the actual proposed development to which the planning permission relates and are not contrary to planning policy.

Given the scale of the development, and the length of time since grant of permission, it is understandable that elements of the design may evolve over time, and the applicant may wish to make minor revisions to the site to ensure that the scheme is deliverable and would fully meet all contemporary standards and requirements.

The proposals should not harm the architectural quality of the building and would be executed to a very high standard, wholly respecting the architectural integrity of the scheme and the character of the surrounding area whilst ensuring the internal layouts are appropriate.

The following is a detailed summary of the proposed changes to the approved permission (LPA Ref: 2020/3737/P), including discussion on the extent of the changes and the consideration of each as a non material amendment, included also is the policy compliancy of each amendment.

An assessment of the proposed amendments against the amended development has been carried out below to demonstrate the acceptability of the scheme. Each of the headings below also relate to specific elements to the development.

### **External Changes**

#### **Amendment 1: Minor reduction in building height**

Refer to drawing ref: 123007-WGI-CA-ZZ-DR-A-1150 - North East Elevation - As Proposed; 123007-WGI-CA-ZZ-DR-A-1151 - North West Elevation - As Proposed; 123007-WGI-CA-ZZ-DR-A-1151 - North West Elevation - As Proposed; 123007-WGI-CA-ZZ-DR-A-1153 - South West Elevation - As Proposed

The approved scheme (2020/3737/P) presents a building constructed using a volumetric modular construction design, which presents a maximum building height of 63.15m AOD.

During the detailed design process, the design approach has changed to incorporate a light gauge steel construction system which would present a reduction in the height of the building by 288mm, to a maximum height of 62.862m AOD. This would be an imperceptible decrease in height relative to the extant permission and retain otherwise the existing form and appearance of the building.

It is considered that amendment 1 is suitable for a S96A application, as the alterations would have a very limited impact to the external appearance of the building, would only lead to an improvement to adjacent residential amenity and would comply with all relevant planning policy.

#### **Amendment 2: Extended maintenance access ladder at roof level**

Refer to drawings refs: 123007-WGI-CA-ZZ-DR-A-1150 - North East Elevation - As Proposed; 123007-WGI-CA-ZZ-DR-A-1151 - North West Elevation - As Proposed; 123007-WGI-CA-ZZ-DR-A-1151 - North West Elevation - As Proposed; 123007-WGI-CA-RF-DR-A-1007 – Roof Plan - As Proposed

The approved scheme (2020/3737/P) does not presently allow for appropriate access arrangements to the roof for maintenance purposes, which is contrary to health and safety regulations.

Following discussions with Officers at the Council, an extended roof access ladder, 1100mm above the roof parapet level would be installed to the north-east elevation of the building, to ensure compliance with health and safety regulations. The location of the ladder is discreetly positioned towards the rear of the building at the side, to minimise visual impact to the street scene.

Amendment 2 is considered suitable for a S96A application as it would present a very minor change to the overall appearance of the building and ensure a limited visual impact to the wider street scene, whilst allowing the development to comply with relevant health and safety requirements. The proposals would also accord with all relevant planning policy.

### **Amendment 3: Minor changes to approved cladding modules**

Refer to drawing ref: 123007-WGI-CA-ZZ-DR-A-1150 - North East Elevation - As Proposed; 123007-WGI-CA-ZZ-DR-A-1151 - North West Elevation - As Proposed; 123007-WGI-CA-ZZ-DR-A-1151 - North West Elevation - As Proposed; 123007-WGI-CA-ZZ-DR-A-1153 - South West Elevation - As Proposed

The approved scheme (2020/3737/P) would allow a façade comprising cladding modules of 250mm x 300mm in size. Through the detailed design process, it has been identified instead the development should be erected using cladding modules which are 225mm x 300mm in size, but of a similar appearance.

Amendment 3 is considered to be suitable for a S96A application as the minor change in cladding module size would present an imperceptible change in the overall appearance of the building and have a very limited impact upon the street scene, whilst allowing for the building to be built out in line with the detailed design, which has been developed since grant of planning permission. The changes would align in full with all planning policy.

### **Amendment 4: Use of alternative materials to the rear elevation wall and deck**

Refer to drawing ref: 123007-WGI-CA-ZZ-DR-A-1152 - South East Elevation - As Proposed; 123007-WGI-CA-00-DR-A-1002 Rev P02 - Floor Plan Level 01-As Proposed; 123007-WGI-CA-02-DR-A-1003 - Floor Plan Level 02-As Proposed; 123007-WGI-CA-03-DR-A-1004 - Floor Plan Level 03-As Proposed; 123007-WGI-CA-04-DR-A-1005 - Floor Plan Level 04-As Proposed

The approved scheme (2020/3737/P) permitted a ribbed/smooth equitone panelling to the rear wall. During the detailed design process, it has been decided that for ease of long-term maintenance and cleaning, the rear walls would instead comprise STO render. As set out in the supporting Design Document, this would provide the benefit of allowing small, damaged areas to be repaired easily, whereas damage to equitone panelling would require replacement of entire panels, at a much greater cost. The overall appearance would remain very similar.

The materials to the deck walkway were designed as an aluminium plank system, but it is proposed to change these to porcelain floor tiles, as this would provide benefits not only in terms of reduction in noise from usage but also being a simpler option for long-term maintenance. Both changes would be to the rear of the building, presenting a minimal visual impact.

Amendment 4 is considered to comprise non-material change as the minor changes in materials would be not only imperceptible, but also would not relate to the street facing elevations and would allow for simpler long-term maintenance solutions to the development. The proposals would be compliant with planning policy.

### **Amendment 5: Alterations to rear stair core and basement layout**

Refer to drawing refs: 123007-WGI-CA-00-DR-A-1001 Rev P02 - Floor Plan Level 00-As Proposed; 123007-WGI-CA-00-DR-A-1002 Rev P02 - Floor Plan Level 01-As Proposed; 123007-WGI-CA-02-DR-A-1003 - Floor Plan Level 02-As Proposed; 123007-WGI-CA-03-DR-A-1004 - Floor Plan Level 03-As Proposed; 123007-WGI-CA-04-DR-A-1005 - Floor Plan Level 04-As Proposed; 123007-WGI-CA-05-DR-A-1006 - Floor Plan Level 05-As Proposed; 123007-WGI-CA-ZZ-DR-A-2453 - Stair-Lift Core Sections - As Proposed; 123007-WGI-CA-ZZ-DR-A-2454 - Stair-Lift Core Sections - As Proposed

The approved scheme (2020/3737/P) includes a cleaners' cupboard and plant room at basement level, accessed via a lift.

Through amendments to the fire strategy, the cleaners' cupboard has been relocated to ground floor level, where the lift shaft terminates. Accordingly, new stair access to the basement for maintenance purposes is to be provided. The layout at basement level is to be revised as a result.

Amendment 5 is considered to be suitable for a S96A application as it would create a minor alteration to the stair core which would not impact upon the overall appearance of the development, nor the wider street scene and would ensure the scheme meets current fire regulations. There are no material impacts to the change to the basement layout. The proposals would be compliant with planning policy.

#### **Amendment 6: Omission of Service Risers to the rear walkway**

Refer to drawing refs: 123007-WGI-CA-00-DR-A-1001 Rev P02 - Floor Plan Level 00-As Proposed; 123007-WGI-CA-00-DR-A-1002 Rev P02 - Floor Plan Level 01-As Proposed; 123007-WGI-CA-02-DR-A-1003 - Floor Plan Level 02-As Proposed; 123007-WGI-CA-03-DR-A-1004 - Floor Plan Level 03-As Proposed; 123007-WGI-CA-04-DR-A-1005 - Floor Plan Level 04-As Proposed; 123007-WGI-CA-05-DR-A-1006 - Floor Plan Level 05-As Proposed

The approved scheme (2020/3737/P) includes service ducts projecting into the walkway, which were required as part of the volumetric modular construction design.

As set out in Amendment 1, the construction method is proposed to diverge from this design, with the new light gauge steel construction system enabling incorporation of the service risers internally. This would provide an additional benefit in the creation of a clearer walkway circulation space.

Amendment 6 is considered suitable for a S96A application as it would present a limited change in the appearance of the rear elevation of the building, whilst accommodating changes required through a change in approach to design and construction. The proposals would be compliant with planning policy.

#### **Amendment 7: Changes to Stair Core Service Risers**

Refer to drawing refs: 123007-WGI-CA-00-DR-A-1001 Rev P02 - Floor Plan Level 00-As Proposed; 123007-WGI-CA-00-DR-A-1002 Rev P02 - Floor Plan Level 01-As Proposed; 123007-WGI-CA-02-DR-A-1003 - Floor Plan Level 02-As Proposed; 123007-WGI-CA-03-DR-A-1004 - Floor Plan Level 03-As Proposed; 123007-WGI-CA-04-DR-A-1005 - Floor Plan Level 04-As Proposed; 123007-WGI-CA-05-DR-A-1006 - Floor Plan Level 05-As Proposed; 123007-WGI-CA-ZZ-DR-A-2453 - Stair-Lift Core Sections - As Proposed; 123007-WGI-CA-ZZ-DR-A-2454 - Stair-Lift Core Sections - As Proposed

The approved scheme (2020/3737/P) does not include services risers to the rear of the development. However, following discussions with the appointed M&E consultant, the service risers are required to set out from the building and rotate by 90° in order to achieve compliance with fire regulations.

Amendment 7 is considered to be non-material, as it will present a very limited aesthetic alteration to the rear of the building and will not have any undue impact on the overall appearance of the development, nor the surrounding street scene or Conservation Area. However, it will allow the optimal function of the building and compliance with fire regulations. The proposals would be compliant with planning policy.

#### **Other changes**

#### **Amendment 8: Amendment to wording of Condition 4**

Refer to drawing ref: 123007-WGI-CA-00-DR-A-1001 Rev P02 - Floor Plan Level 00-As Proposed; 123007-WGI-CA-00-DR-A-1002 Rev P02 - Floor Plan Level 01-As Proposed; 123007-WGI-CA-02-DR-A-1003 - Floor Plan Level 02-As Proposed; 123007-WGI-CA-03-DR-A-1004 - Floor Plan Level 03-As Proposed; 123007-WGI-CA-04-DR-A-1005 - Floor Plan Level 04-As Proposed; 123007-WGI-CA-05-DR-A-1006 - Floor Plan Level 05-As Proposed

As a design audit of the scheme has been undertaken by the Project Team taking forward the detailed design and delivery of the proposals, it has been observed that the hostel accommodation within both schemes has not been designed to meet the design criteria and compliance requirements associated with the Approved Document Part M.

Instead, the rooms were designed in accordance with the Camden Hostels Guidelines, which recommend only the minimum Bedroom, Kitchen and Shower Room minimum floor areas and there is no reference in the Hostel Design Guidelines to Part M compliance.

Furthermore, the approved development has a Sui Generis use class, which is not subject to compliance with AD Part M and it is evident that the unit layouts developed by the original architects working closely with the Council's Homelessness Team were not designed to achieve AD Part M4(2) compliance. The shower tray arrangement was preferred by the client's Team as the most suitable for the units.

Therefore, the schemes as approved would not be able to meet Part M4(2) compliance requirements. In order to achieve compliance, the internal layouts would need to be reconfigured, to provide a level access shower and introduce 300 mm unobstructed door nibs. This would impact upon the internal circulation arrangements and, potentially, the approved quantum of hostel rooms.

Accordingly, the scheme as approved would not comply with the part of each condition requiring 'all other units being designed and constructed in accordance with Building Regulations Part M4(2). Whereas it is understood that this was presented as such within the planning submission and determination, this presents a conflict within the planning permission.

Following discussions with officers at the Council, it is agreed that the wording of Condition 4 be changed as follows to reflect the above, with the amendments set out in red:

*The wheelchair accessible unit shown on the plan number **123007-WGI-CA-00-DR-A-1001 Rev P02** hereby approved, shall be designed and constructed in accordance with Building Regulations Part M4 (3), with all other units being designed and constructed in accordance with Building Regulations Part **M4 (1)**.*

*Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy C6 of the London Borough of Camden Local Plan 2017*

### Summary

The proposed amendments above do not materially alter the scheme approved under planning permission 2020/3737/P and are therefore considered to constitute non-material amendments to the approved development.

Accordingly, the following plans are submitted for amendment pursuant to Condition 2. All other plans, elevations and documents remain as set out in Condition 2. These revised plans are enclosed with this letter and the table below shows which the relevant approved plans and the corresponding superseding plans:

Approved plans (2020/3461/P)	Submitted plans
1931-RCK-ZZ-B1-DR-A- 08100 Rev P04 - Floor Plan Level B1 - As Proposed	123007-WGI-CA-B1-DR-A-1000 - Floor Plan Level B1-As Proposed
1931-RCK-ZZ-00-DR-A- 08101 Rev P04 - Floor Plan Level 00 - As Proposed	123007-WGI-CA-00-DR-A-1001 Rev P02 - Floor Plan Level 00-As Proposed
1931-RCK-ZZ-01-DR-A- 08102 Rev P04 - Floor Plan Level 01 - As Proposed	123007-WGI-CA-00-DR-A-1002 Rev P02 - Floor Plan Level 01-As Proposed

1931-RCK-ZZ-ZZ-DR-A- 08103 Rev P04 - Floor Plan Levels 02- 03 - As Proposed	123007-WGI-CA-02-DR-A-1003 Rev P02 - Floor Plan Level 02-As Proposed
1931-RCK-ZZ-ZZ-DR-A- 08103 Rev P04 - Floor Plan Levels 02- 03 - As Proposed	123007-WGI-CA-03-DR-A-1004 Rev P02 - Floor Plan Level 03-As Proposed
1931-RCK-ZZ-04-DR-A- 08104 Rev P04 - Floor Plan Level 04 - As Proposed	123007-WGI-CA-04-DR-A-1005 Rev P02 - Floor Plan Level 04-As Proposed
1931-RCK-ZZ-05-DR-A- 08105 Rev P04 - Floor Plan Level 05 - As Proposed	123007-WGI-CA-05-DR-A-1006 Rev P02 - Floor Plan Level 05-As Proposed
1931-RCK-ZZ-RF-DR-A- 08106 Rev P04 - Roof Plan - As Proposed	123007-WGI-CA-RF-DR-A-1007 Rev P02 – Roof Plan - As Proposed
1931-RCK-ZZ-XX-DR-A- 08202 Rev P05 - North East and South West Elevations - As Proposed (Revised)	123007-WGI-CA-ZZ-DR-A-1150 Rev P02 - North East Elevation- As Proposed
1931-RCK-ZZ-XX-DR-A- 08200 Rev P04 - North West Elevation - As Proposed	123007-WGI-CA-ZZ-DR-A-1151 Rev P02 - North West Elevation - As Proposed
1931-RCK-ZZ-XX-DR-A- 08201 Rev P05 - South East Elevation - As Proposed	123007-WGI-CA-ZZ-DR-A-1152 Rev P02 - South East Elevation - As Proposed
1931-RCK-ZZ-XX-DR-A- 08202 rev P05 - North East and South West Elevations - As Proposed (Revised)	123007-WGI-CA-ZZ-DR-A-1153 Rev P02 - South West Elevation-As Proposed
N/A	123007-WGI-CA-ZZ-DR-A-2453 Rev P02 - Stair-Lift Core Sections - As Proposed
N/A	123007-WGI-CA-ZZ-DR-A-2454 Rev P02 - Stair-Lift Core Sections - As Proposed

## b. Conclusion

In summary, the proposed amendments are considered non-material in nature, acceptable in planning terms and will not have a detrimental impact on neighbouring residents or to those in the surrounding locality. The changes primarily relate to very minor external design changes to the approved development, as well as amendments to the wording of conditions..

Following submission of the information detailed above, we trust that you have sufficient information required to consider the proposed non material amendments and we look forward to receiving confirmation in writing.

Should you have any queries or wish to discuss any aspect of the application in further detail please do not hesitate to contact William Clutton ([wclutton@iceniprojects.com](mailto:wclutton@iceniprojects.com), 07557 805372) or Kieron Hodgson ([khodgson@iceniprojects.com](mailto:khodgson@iceniprojects.com), 07807 264 704) of this office in the first instance.

Yours faithfully,

Iceni Projects Ltd.

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