**FAO KRISTINA SMITH**

**London Borough of Camden**

**Camden Council**

**5 Pancras Square**

**London**

**N1 4AG**

Thursday 3rd April 2025

Dear Kristina,

**RE: NON MATERIAL AMENDMENT TO PLANNING PERMISSION 2024/0479**

On behalf of Regal Chalk Farm Limited (hereafter referred to as ‘The Applicant’), this letter accompanies an application for a non-material amendment to planning permission 2024/0479 (dated 27th November 2024).

**Relevant Planning History**

On 27th November 2024, planning permission was approved for the ‘Demolition of existing buildings and redevelopment of the site to provide two new buildings of between 6-12 storeys: one containing affordable homes (Class C3) and one (with three cylindrical volumes) containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), a ground floor commercial space (Sui Generis), a ground floor commercial space (Class E) together with public realm, access, plant installation, and other associated works’ (application reference 2024/0479).

The Applicant has undertaken a series of pre-application meetings with Kristina Smith (planning case officer) and Alastair Crockett (design officer) since November 2024 to run through proposed design amendments that respond to wider building compliance restraints. The process has been carried out as a series of workshops which have also been attended by Ryder Architects, the appointed Delivery Architect and DSDHA, the retained Design Guardian and original architect appointed through the planning application process. These various discussions have informed the final NMA proposals.

**Building Safety Regulator Context**

The Building Safety Regulator (BSR) is the new regulator that has been established to ensure that defined higher risk buildings meet the highest safety standards. At the original planning application stage, a Gateway 1 assessment was submitted as part of the planning application and the Health & Safety Executive confirmed that it had no objections to the proposals. At the next stage in the process, Gateway 2 will provide rigorous inspection of building regulations requirements, ensuring that building safety is considered at the next stage of design and construction.

Once the original planning application for 100 Chalk Farm Road was submitted in January 2024, the Applicant immediately commenced RIBA Design Stage 3 for the proposals. This was to ensure that sufficient design development could be progressed to inform the necessary Gateway 2 submission to the BSR. The Gateway 2 submission took place in December 2024 with an anticipated decision due in May 2025. In order to ensure a robust and compliant submission, it became clear through Stage 3 & 4 design development that a series of consequential changes are necessary to ensure compliance. This NMA captures these changes and sets out further justification and rationale below, although it should be noted that these have previously been presented and discussed with Camden officers as part of the pre-application discussions ahead of this NMA submission.

Importantly it should be noted that Gateway 2 provides a ‘hold point’ where construction cannot begin until BSR is satisfied that the design meets the functional requirements of the building regulations. Unless the Gateway 2 application is approved, no permanent construction works can be undertaken. It is a requirement that the proposed building designs are approved by the BSR at Gateway 2 or else the project will not progress. The implementation of the new BSR process has not been straightforward and it has been well documented that there has been delays in the process as the wider construction industry and the BSR itself has got to grips with the necessary resource and assessment requirements.

The above therefore sets out an important context for this non-material amendment application. Regal has been working on a number of projects which need to go through the BSR process including 100 Chalk Farm Road. We have therefore gained experience in recent months as to what is required in terms of design and information to ensure a successful application. However, this does require some changes to the proposals as designed at the original planning application stage as it has become clearer on how compliant designs can be achieved.

**Further Rationale for NMA**

Following the granting of planning permission in November 2024, demolition works commenced on Site in Q1 2025. Ahead of this, the proposals have undergone l Stage 3 and 4 design, which includes a compliance review with BSR and fire regulations. The review established a series of amendments required to ensure full compliance with the regulations. These include:

1. **Amendments to the PBSA core and internal ground floor layout to rationalise the escape strategy whilst improving the arrival experience to the building, including external escape routes.** The new cores and means of escape have been designed to achieve a full separation from the commercial basement and the PBSA above ground, with more clarity of demises and improved fire separation. This review of the cores and the means of escape routes is as a result of the Applicant’s recent experience on the new BSR review approach on similar schemes. The accompanying Design pack produced by Ryder details this further including commentary on alterations to the facade.
2. **Separation of the bin store**. The arrangement of the bin store has given the opportunity to create two compartments in a way to have a functional separation between the two uses. This has no impact on the overall waste collection strategy.
3. **Readjustment of the student building main entrance by 2m.** An additional means of escape from the basement to ground level, discharged next to the student building entrance door, has been provided to accord with fire regulations. The student building entrance door has been re-adjusted by 2m to allow for a minimum separation distance of the 1.8m between both entrances, as part of the fire strategy to protect the basement escape route. The basement escape door has been located in a way to merge within the bays of the facade design, with no impact on the consented brick piers rhythm. A canopy over the entrance has also been refined further.
4. **Minor amendments to the studio student bedrooms** (without affecting any sizes).The student accommodation staircase has been extended to ground level in line with fire requirements. This has resulted in the relocation of the disabled unit that was using the footprint of the stair shaft at the lower floors. In total, 10% of wheelchair accessible bedrooms will be provided.
5. **Minor window positioning adjustment to align with structural grid.** The student rooms have been tweaked to suit the new core design and also to take into consideration the additional level of detail of the design, which now has been fully designed from an MEP and structural perspective. The design principles of the building remain as per consented.
6. **Increase in slab levels 5 and 6 of student accommodation building to allow for level access, in turn reducing the crown height (overall building heights to remain as permitted).** In order to allow for insulation to be installed to the accessible roof terrace the finished floor level (FFL) had to be raised on levels 5 and 6 in order to allow for the thicker build-up .
7. **Inclusion of a roof terrace mesh balustrade.** During the detailed design development of the façade access and maintenance strategy it has become apparent that a mesh balustrade, while required to the accessible roof, would not be feasible as a full height feature. As such, the mesh balustrade height has been included at a height to allow for the davit arms to be operated between the mesh and the top of the parapet safely.
8. **Amendments to the Affordable Housing lobby and ore to improve circulation and meet fire standards.** This results in minor layouts changes to the flats with no changes to size or mix, or aspect.
9. **Basement Reconfiguration** to respond to latest survey information on existing piles locations, comply with Network Rail construction zone requirements and escape stair distances.

The NMA also captures a series of amendments to the landscaping elements of the planning permission. On the ground floor, in response to fire regulations, green walls have been removed along the Roundhouse escape route. A planter remains with evergreen planting to continue to soften the visual impact of the wall. Where some planters and climbers have been removed, additional trees and planters have been added in other locations to retain the UGF score of 0.34 and to improve privacy of residents. Changes to proposed plant species have been included where environmental conditions are likely to impact their long term growth. In addition, some surface materials have been amended in response to fire safety regulations – including in play areas and in the emergency vehicle set down location. Emergency smoke vents have also been introduced behind integrated screens at podium level in response to fire strategy requirements.

Full details of the proposed amendments are included within the DAS Addendum accompanying this application. This application is supported by the following documents:

* Completed Application Form;
* This Planning Covering Letter (Regal);
* Revised design pack for approval under this NMA application (Ryder Architecture and Anna French Landscape Architects);
* An accompanying letter from DSDHA Architects summarising the design compliance discussions that have been undertaken;
* Revised drawings (see Appendix One) and
* Basement Impact Assessment (Milvum).

The design pack includes indicative visualisations and it should be noted that the façade materials will be agreed separately with officers in accordance with Conditions 15 and 16 attached to the decision notice. The accompanying Basement Impact Assessment (BIA) prepared by Milvum is further to the BIA prepared by Pell Frischmann in support of the approved planning application (2024/0479). The updated BIA summarises that the proposals continue to have no adverse impact on land stability, groundwater and surface water flow, and continues to have a very low risk of flooding.

The proposals were unanimously approved by members at Planning Committee earlier in the year and include a range of benefits, including the delivery of 24 on site affordable homes (a quarter of which will be 3-bed social rent homes) and high quality purpose built student accommodation. The provision of ground floor commercial uses will contribute to the vitality and vibrancy of the high street and Camden Town Centre. Furthermore, the new public realm spaces enhance the setting of the Grade II\* Roundhouse and provide much needed pockets of open space. The high quality design led proposals were considered to respond to the historic significance of the local area, including the Camden Wall legacy and the Regents Canal Conservation Area. The proposals also bring in significant economic and social benefits the Borough.

A payment of £363 (including VAT and the Planning Portal administration fee) has been made via the Planning Portal in respect of the Council’s planning application fee.

We consider that this application is non-material amendment in the context of the overall scheme. This NMA is essential to ensure the delivery of the proposals. The applicant has undertaken a series of pre-application meetings with the case officer Kristina Smith and Design Officer Alastair Crockett to establish these proposed NMA changes in principle. If you have any queries, please do not hesitate to contact Charlotte Wheeler (charlotte.wheeler@regal.co.uk) at this office.

Yours sincerely,

C Wheeler

Charlotte Wheeler

Senior Planning Manager

For and on behalf of Regal Chalk Farm Limited

**Appendix One: To be Approved Drawings Schedule**

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| 356\_P40.121\_Proposed AH Section FF\_Proposed.pdf  |
| 356\_P20.099\_Basement Floor Plan\_Proposed.pdf  |
| 356\_P20.100\_Ground Floor Plan\_Proposed.pdf  |
| 356\_P20.101\_Level 1 Floor Plan\_Proposed.pdf  |
| 356\_P20.102\_Level 2-3 Floor Plan\_Proposed.pdf  |
| 356\_P20.104\_Level 4-5 Floor Plan\_Proposed.pdf  |
| 356\_P20.106\_Level 6 Floor Plan\_Proposed.pdf  |
| 356\_P20.107\_Level 7-8 Floor Plan\_Proposed.pdf  |
| 356\_P20.109\_Level 9 Floor Plan\_Proposed.pdf  |
| 356\_P20.110\_Level 10 Floor Plan\_Proposed.pdf  |
| 356\_P20.111\_Level 11 Floor Plan\_Proposed.pdf  |
| 356\_P20.112\_Level 12 Floor Plan\_Proposed.pdf  |
| 356\_P20.113\_Roof Plan\_Proposed.pdf  |
| 356\_P20.129\_PBSA Basement Floor Plan\_Proposed.pdf  |
| 356\_P20.130\_PBSA Ground Floor Plan\_Proposed.pdf  |
| 356\_P20.131\_PBSA Level 1 Floor Plan\_Proposed.pdf  |
| 356\_P20.132\_PBSA Level 2 - 4 Floor Plan\_Proposed.pdf  |
| 356\_P20.135\_PBSA Level 5 Floor Plan\_Proposed.pdf  |
| 356\_P20.136\_PBSA Level 6 Floor Plan\_Proposed.pdf  |
| 356\_P20.137\_PBSA Level 7 - 8 Floor Plan\_Proposed.pdf  |
| 356\_P20.139\_PBSA Level 9 Floor Plan\_Proposed.pdf  |
| 356\_P20.140\_PBSA Level 10 - 11 Floor Plan\_Proposed.pdf  |
| 356\_P20.142\_PBSA Level 12 Floor Plan\_Proposed.pdf  |
| 356\_P20.143\_Roof Plan\_Proposed.pdf  |
| 356\_P20.160\_Affordable Housing Building Proposed Ground Floor Plan\_Proposed.pdf  |
| 356\_P20.161\_Affordable Housing Building Proposed Level 1 Plan\_Proposed.pdf  |
| 356\_P20.162\_Affordable Housing Building Proposed Level 2 - 3 Plan\_Proposed.pdf  |
| 356\_P20.164\_Affordable Housing Building Proposed Level 4 - 6 Plan\_Proposed.pdf  |
| 356\_P20.167\_Affordable Housing Building Proposed Level 7 - 8 Plan\_Proposed.pdf  |
| 356\_P20.169\_Affordable Housing Building Proposed Level 9 Plan\_Proposed.pdf  |
| 356\_P20.170\_Affordable Housing Building Proposed Level 10 Plan\_Proposed.pdf  |
| 356\_P20.172\_Affordable Housing Building Proposed Roof Plan\_Proposed.pdf  |
| 356\_P30.104\_Context Elevations\_Proposed.pdf  |
| 356\_P30.120\_PBSA\_North\_Elevation\_Proposed.pdf  |
| 356\_P30.121\_PBSA\_South\_Elevation\_Proposed.pdf  |
| 356\_P30.122\_PBSA\_East\_Elevation\_Proposed.pdf  |
| 356\_P30.123\_PBSA\_West\_Elevation\_Proposed.pdf  |
| 356\_P30.130\_Affordable Housing North Elevation\_Proposed.pdf  |
| 356\_P30.131\_Affordable Housing South Elevation\_Proposed.pdf  |
| 356\_P30.132\_Affordable Housing East Elevation\_Proposed.pdf  |
| 356\_P30.133\_Affordable Housing West Elevation\_Proposed.pdf  |
| 356\_P40.110\_Proposed PBSA Section AA\_Proposed.pdf  |
| 356\_P40.111\_Proposed PBSA Section BB\_Proposed.pdf  |
| 356\_P40.112\_Proposed PBSA Section CC\_Proposed.pdf  |
| 356\_P40.113\_Proposed PBSA Section DD\_Proposed.pdf  |
| 356\_P40.120\_Proposed AH Section EE\_Proposed.pdf  |
| 356\_P40.121\_Proposed AH Section FF\_Proposed.pdf  |

