Our ref: Q080621
Your ref: 2018/0503/P
Email: aaron.brown@quod.com
Date: 21 March 2018

FAO: Seonaid Carr
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall,
Judd Street
London
WC1H 9JE

Dear Seonaid,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
FULL APPLICATION FOR THE REPLACEMENT OF WINDOWS AND CLADDING OF THE FIVE TOWER BLOCKS AT THE CHALCOTS ESTATE WITH A SOLID ALUMINIUM PANEL FAÇADE AND ASSOCIATED EXTERNAL WORKS (REF. 2018/0503/P)
TAPLOW, BURNHAM, BRAY, DORNEY AND BLASHFORD TOWERS, CHALCOTS ESTATE, SWISS COTTAGE, NW3

1 Introduction

1.1 We are instructed by our client, London Borough of Camden (herein referred to as 'the Applicant'), to submit amended design details in relation to the full planning application (ref. 2018/0503/P) for:

> ***Replacement of windows and cladding of the five tower blocks (Taplow, Burnham, Bray, Dorney and Blashford) at the Chalcots Estate with a solid aluminium panel facade and associated external works[1].***

1.2 Since the appointment of ARUP as principal designer for the proposed development associated with application reference 2018/0503/P, a comprehensive review of the original design submitted 29 January 2018 has been undertaken that proposes a number of minor design changes, discussed further under section b) of this letter. The London Borough of Camden Better Homes Delivery Department want to ensure the proposed design is of the highest quality feasible, meeting the needs of existing and future residents. This is critical given the nature of the proposed development.

1.3 The updated design details have been submitted via email to Case Officer Seonaid Carr 15 March 2018 and include the following:

- Updated application form;
- This covering letter;

[1] Updated description of development in accordance with the proposed design changes at Appendix 1.

- Updated set of proposed plans for approval; and
- Addendum to the Design and Access Statement (DAS)

2 Design changes

2.1 The design review of the original design prepared by Neil Davies identified opportunities to enhance the original design to secure a range of benefits, including; improved thermal performance, improved visual appearance and resident safety; better alignment with the as-built condition and enhanced maintenance access, increasing the lifespan of the building.

2.2 The schedule at Appendix 1 sets out the design changes proposed, which tower and element these changes relate to, and the reasons for and benefits derived from the changes where relevant. The design proposals set out in full at Appendix 1 include but are not limited to:

Blashford, Bray, Burnham, Taplow and Dorney

- Increased thickness of the rainscreen system, resulting in:
  - increase of the overall width of the envelope in elevation;
  - decrease in the width of the recessed area at each side of the recess;
  - increase in the depth of the windows reveals; and
  - increase of the capping width at rooftop level.
- Amended boiler flue positions.
- Amended position of cavity barriers.
- New windows[2].
- Vertical band of rainscreen with an atypical build-up included where the rainscreen is directly adjacent to the smoke vents in the recess.

Blashford

- Amended window configuration for the widest window units.
- Intermediate horizontal window profiles omitted.
- Ventilation openings in the rainscreen cladding to the areas where gas pipes are located in the recessed elevations.

3 Policy context

3.1 The purpose of this letter is not to restate the contents of the Planning Statement (January 2018), prepared by Quod, submitted in support of the application (ref. 2018/0503/P). Rather, sections c) and d) of the letter

[2] Four options being considered all with a similar external appearance: bottom hung open inwards; top hung open outwards; tilt & turn inwards; and tilt & turn outwards.

highlight planning policy and related considerations particularly relevant to the design changes proposed herein.

3.2 The statutory development plan for the site comprises the Camden Local Plan (2016) and The London Plan (2017).

a) National Planning Policy Framework (2012)

National Planning Policy Framework (NPPF, 2012)

3.3 The NPPF (2012) sets out the Government's planning policies for England and how these are expected to be applied, it is therefore a material consideration in determining planning applications.

3.4 Paragraph 56 of the NPPF (2012) attaches *"great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people".*

3.5 Paragraph 58 of the NPPF (2012) seeks planning decisions to ensure that development:

- **"will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;**
- **respond to local character and history, and reflect the identity of local surroundings and materials...**
- **create safe and accessible environments…"**

3.6 Paragraph 66 of the NPPF (2012) expects applicants to *"work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably."*

b) Planning Practice Guidance (PPG)

3.7 On 6 March 2014 the Department of Communities and Local Government (now the Ministry of Housing, Communities & Local Government) launched the PPG web-based resource. The PPG adds further context to the NPPF (2012) and it is intended that the two should be read together.

3.8 The PPG confirms *"an application can be amended after it has been submitted"* (NPPF Ref. ID: 15-025-20140306). It is at the discretion of the local planning authority whether to accept such changes, to determine if the changes need to be reconsulted upon, or if the proposed changes are so significant as to materially alter the proposal such that a new application should be submitted. (PPG Reference ID: 14-061-20140306).

3.9 Where an application has been amended it is up to the local planning authority to decide whether further publicity and consultation is necessary. Where the local planning authority has decided that re-consultation is necessary, it is open to them to set the timeframe for responses, balancing the need for consultees to be given time to consider the issue that is being re-consulted upon and respond against the need for efficient decision making. (PPG Reference ID: 15-026-20140306)

c) Regional Planning Policy

London Plan

3.10 The regional planning policy for the Site comprises the London Plan (2016).

3.11 Policy 3.5 of The London Plan (2016) seeks housing developments of *"the highest quality internally, externally and in relation to their context and to the wider environment…"*

3.12 Policy 5.3 of The London Plan (2016) expects development proposals to achieve "the highest standard of sustainable design and construction…" including but not limited to *"minimising carbon dioxide emissions, including building and services (such as heating and cooling systems)"* and *"avoiding internal overheating and contributing to the urban heat island effect".*

3.13 Policy 7.13 of The London Plan (2016) confirms the Mayor will seek to *"…ensure and maintain a safe and secure environment in London… Development proposals should contribute to the minimisation of potential physical risks."*

3.14 The Draft London Plan (2017) does not propose changes that will have a material impact on the revised design for the Chalcots towers.

d) Local Planning Policy

Camden Local Plan (2017)

3.15 Good design is essential to creating places, buildings, or spaces that work well for everyone, look good, last well and will adapt to the needs of future generations. Policy D1 of the Camden Local Plan (2017) confirms the Council will seek to secure high quality design that:

- **"respects local context and character;**
- **preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;**
- **is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;**
- **is of sustainable and durable construction and adaptable to different activities and land uses;**
- **comprises details and materials that are of high quality and complement the local character…"**

e) Planning considerations

3.16 The Applicant has assessed the design changes proposed, set out at **Appendix 1,** against the relevant planning policy and guidance and confirm the changes are not significant so as to materially alter the proposals such that a new application should be proposed. Furthermore, the Council have confirmed that the principle of this approach is acceptable and that the revised proposals represent an opportunity to meaningfully enhance the scheme.

3.17 The Applicant meets regularly with residents of the Chalcots estate to keep the community abreast of developments. The design changes proposed have evolved, in part, to take account of the needs of the community, in accordance with the aspirations of the NPPF (2012).

3.18 The design review process identified opportunities to address safety concerns at the Chalcots Estate. The windows proposed[3] are considered by the Applicant to enhance the safety of residents, as well as mitigate

[3] Four options being considered all with a similar external appearance: bottom hung open inwards; top hung open outwards; tilt & turn inwards; and tilt & turn outwards.

the risk of window hardware failures, in accordance with London Plan (2016) Policy 7.13 by contributing *"to the minimisation of potential physical risks."*

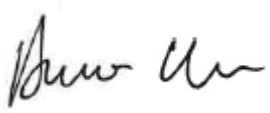
3.19 The proposed changes seek to provide a sustainable design, *"incorporating best practice in resource management and climate change mitigation and adaptation"* in line with Policy D1 of the Camden Local Plan (2017). The minor increase (83.5mm) to the thickness of the rainscreen system, which feeds through into design changes to the main elevations, recessed areas and window reveals and roof parapet overrun for the tower blocks, is proposed to satisfy the thermal performance requirements (Approved Document L1B)

3.20 Finally, the design changes taken as a whole are proposed to secure a high quality design *"not just for the short term but over the lifetime of the development"* in accordance with the aims of national, regional and local planning policy and guidance. The changes to the boiler flue positions and window configuration on Blashford, to provide an appearance that is complimentary with the window typology on the four typical blocks, amongst others, will assist the Applicant in delivering a design of the *"highest quality internally, externally and in relation to their context and to the wider environment…"* (Policy 2.5 of the London Plan, 2016).

3.21 The proposed changes will allow the London Borough of Camden Better Homes Delivery Department to deliver an improved design that will benefit both existing and future residents of the Chalcots estate. These changes are considered to be generally consistent with the proposals applied for under the existing full planning application (ref. 2018/0503/P).

3.22 We trust the enclosed is sufficient for you to register and validate the revised design details. If however you require any additional information please do not hesitate to contact me.

Yours sincerely



Aaron Brown
Planner

APPENDIX 1

SCHEDULE OF DESIGN CHANGES PROPOSED

Tower(s)	Location	Element	Description of design change
Blashford, Bray, Burnham, Taplow and Dorney	Main elevations	Increase rainscreen build-up	Amended rainscreen build-up of 300mm thickness from the face of the outer concrete panel substrate to the outer face of the rainscreen panels (216.55mm as proposed by original design). This results in a minor increase of the overall width of the envelope in elevation of 83.5mm at each side of the elevation.
Blashford, Bray, Burnham, Taplow and Dorney	Recessed areas	Increase rainscreen build-up	Amended rainscreen build-up of 300mm thickness from the face of the outer concrete panel substrate to the outer face of the rainscreen panels (216.55mm as proposed by original design). This results in a minor decrease in the width of the recessed area of 83.5mm at each side of the recess.
Blashford, Bray, Burnham, Taplow and Dorney	Window reveals	Increase rainscreen build-up	Amended rainscreen build-up of 300mm thickness from the face of the outer concrete panel substrate to the outer face of the rainscreen panels (216.55mm as proposed by original design). This results in an increase in the depth of the windows reveals of 83.5mm.
Blashford, Bray, Burnham, Taplow and Dorney	Main elevations	Boiler flues	Boiler flue positions revised to match the as-built position.
Bray, Burnham, Taplow and Dorney	Recessed Areas	Window configurations	Window configuration amended to maintain the as-build position.
Blashford, Bray, Burnham, Taplow and Dorney	Main elevations	Cavity barriers positioning	Vertical position of cavity barriers amended with respect to the structural slab level.

Blashford, Bray, Burnham, Taplow and Dorney	Windows	Window opening functions	Amended window opening function. The proposed drawings assume that the windows will open inwards for the purposes of safety and robustness to mitigate the risk of window hardware failures. The Council is engaging residents on 4 options: bottom hung open inwards; top hung open outwards; tilt & turn inwards; and tilt & turn outwards. All options being considered would have a similar external appearance for planning purposes. If after engagement a further change is required a non-material amendment application will be submitted later in the process.
Blashford	Windows	Window configuration	Intermediate horizontal window profiles omitted. This provides increased glazing area and an appearance that is complimentary with the window typology on the four typical towers.
Blashford, Bray, Burnham, Taplow and Dorney	Recessed areas	Build-up variation for recessed areas	A vertical band of rainscreen with an atypical (slimmer) build-up is necessary where the rainscreen is directly adjacent to the smoke vents (AOV's) in the recess. The rainscreen build-up is reduced from the typical build-up of 300mm in order to allow the AOV's to open outwards without clashing with rainscreen.
Blashford, Bray, Burnham, Taplow and Dorney	Roof parapet overrun	Increase capping to existing parapet overrun	Amended rainscreen build-up of 300mm thickness from face of the outer concrete panel substrate to the outer face of the rainscreen panels (216.55mm as proposed by original design). This leads to an increase of the capping width at rooftop level of 83.5mm outwards.
Blashford	Windows	Window configuration	Window configuration amended for the widest window units on Blashford. An

			additional vertical framing element is introduced in the centre of the windows to facilitate the amendment to open the windows inwards.
Bray, Burnham, Taplow and Dorney	Main elevations	Window cill levels	Window frame level raised by 40mm to accommodate minimum internal cill heights.
Blashford	Recessed area	Ventilation openings in rainscreen	The proposed rainscreen will encapsulate the existing gas pipes within the rainscreen cavity. Ventilation openings through the rainscreen panels are proposed to vent the cavity externally. The rainscreen cavity is sub-divided (by cavity barriers) in to storey height zones, the ventilation openings are located at the bottom and top of each storey height zone.