

15 March 2021



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Dear Madam

**APPLICATION FOR A NON-MATERIAL AMENDMENT APPLICATION UNDER SECTION 96 OF THE TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) AT:  
KODAK HOUSE, 65 KINGSWAY, LONDON, WC2B 6TD**

We are instructed on behalf of Kings Keeley Limited to submit a non-material amendment (NMA) application under Section 96A of the Town and Country Planning Act 1990 (as amended), in respect of planning permission 2019/6088/P at Kodak House, 65 Kingsway, London, WC2B 6TD. Camden Council formally granted Planning permission and Listed Building Consent (Ref: 2019/6270/L & 2019/6088/P) on 1 May 2020 for the following description of development:

*"Alterations to the existing building including recladding of the 6th floor extension together with new window openings, rebuilding and recladding of the 7th floor extension with new window openings, installation of new plant screen on the roof, replacement of all windows, reinstatement of window openings and new entrance on the ground floor Keeley Street elevation, installation of new canopy, metal signage detailing "Kodak House" on Kingsway entrance and on new Keeley Street entrance, creation of communal terrace, green roof and associated railings at 8th floor level all in association with the existing mixed use building".*

As part of the detailed design process, some scheme amendments are now proposed to the consented scheme, and this NMA application seeks to gain your Council's approval for these essentially minor changes. Alongside this application, a new listed building consent application has been submitted to deal with these changes.

The application has been submitted via the Planning Portal (Ref: PP-09467773) and comprises the following information:

- This Cover Letter, prepared by Savills
- Completed application form
- Statutory application fee of £234.00
- Heritage Advice Note, prepared by Bidwells
- Schedule of Changes, Prepared by Barr Gazetas
- Drawings, prepared by Barr Gazetas, as follows:

Old Drawing Number	New Drawing Number	Drawing title	Scale and Size
1914-BG-01-ZZ-DR-A-00.100 Rev P4	N/A	Site Location Plan	1:1250 @ A1
1914-BG-01-00-DR-A-20.202 Rev P4	1914-BG-01-00-DR-A-20.202 Rev P6	Proposed Ground Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-01-DR-A-20.203 Rev P4	1914-BG-01-01-DR-A-20.203 Rev P6	Proposed First Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-03-DR-A-20.204 Rev P4	1914-BG-01-03-DR-A-20.204 Rev P5	Proposed Second Floor Plan	1:100 @ A1 / 1:200 @ A3

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1914-BG-01-03-DR-A-20.205 Rev P4	1914-BG-01-03-DR-A-20.205 Rev P5	Proposed Third Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-04-DR-A-20.206 Rev P4	1914-BG-01-04-DR-A-20.206 Rev P5	Proposed Fourth Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-05-DR-A-20.207 Rev P4	1914-BG-01-05-DR-A-20.207 Rev P5	Proposed Fifth Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-06-DR-A-20.208 Rev P4	1914-BG-01-06-DR-A-20.208 Rev P5	Proposed Sixth Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-08-DR-A-20.210 Rev P4	1914-BG-01-08-DR-A-20.210 Rev P9	Proposed roof plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-B1-DR-A-20.201 Rev P4	1914-BG-01-B1-DR-A-20.201 Rev P7	Proposed Basement Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.252 Rev P4	1914-BG-01-ZZ-DR-A-20.252 Rev P5	Proposed Section BB	1:100 @ A1 / 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.255 Rev P4	1914-BG-01-ZZ-DR-A-20.255 Rev P9	Proposed Section EE	1:100 @ A1 / 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.271 Rev P4	1914-BG-01-ZZ-DR-A-20.271 Rev P9	Proposed Keeley Street Elevation	1:100 @ A1 / 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.272 Rev P4	1914-BG-01-ZZ-DR-A-20.272 Rev P6	Proposed Kingsway Elevation	1:100 @ A1 / 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.273 Rev P4	1914-BG-01-ZZ-DR-A-20.273 Rev P6	Proposed Wild Court Elevation	1:100 @ A1 / 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.274 Rev P4	1914-BG-01-ZZ-DR-A-20.274 Rev P6	Proposed West Elevation	1:100 @ A1 / 1:200 @ A3
1914-BG-ZZ-07-DR-A-20.209 Rev P4	1914-BG-ZZ-07-DR-A-20.209 Rev P5	Proposed Seventh Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-00-DR-A-15.202 Rev P4	1914-BG-01-00-DR-A-15.202 Rev P5	Demolition Ground Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-01-DR-A-15.203 Rev P4	1914-BG-01-01-DR-A-15.203 Rev P6	Demolition First Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-02-DR-A-15.204 Rev P4	1914-BG-01-02-DR-A-15.204 Rev P5	Demolition Second Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-03-DR-A-15.205 Rev P4	1914-BG-01-03-DR-A-15.205 Rev P5	Demolition Third Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-04-DR-A-15.206 Rev P4	1914-BG-01-04-DR-A-15.206 Rev P5	Demolition Fourth Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-05-DR-A-15.207 Rev P4	1914-BG-01-05-DR-A-15.207 Rev P5	Demolition Fifth Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-06-DR-A-15.208 Rev P4	1914-BG-01-06-DR-A-15.208 Rev P5	Demolition Sixth Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-07-DR-A-15.209 Rev P4	1914-BG-01-07-DR-A-15.209 Rev P5	Demolition Seventh Floor Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-B1-DR-A-15.201 Rev P4	1914-BG-01-B1-DR-A-15.201 Rev P5	Demolition Basement Plan	1:100 @ A1 / 1:200 @ A3
1914-BG-01-ZZ-DR-A-15.252 Rev P4	1914-BG-01-ZZ-DR-A-15.252 Rev P5	Demolition Section BB	1:100 @ A1 / 1:200 @ A3
1914-BG-01-ZZ-DR-A-15.255 Rev P4	1914-BG-01-ZZ-DR-A-15.255 Rev P5	Demolition Section EE	1:100 @ A1 / 1:200 @ A3
1914-BG-01-ZZ-DR-A-15.271 Rev P4	1914-BG-01-ZZ-DR-A-15.271 Rev P5	Demolition Keeley Street Elevation	1:100 @ A1 / 1:200 @ A3
1914-BG-01-ZZ-DR-A-15.273 Rev P4	1914-BG-01-ZZ-DR-A-15.273 Rev P5	Demolition Wild Court Elevation	1:100 @ A1 / 1:200 @ A3
1914-BG-01-00-DR-A-34.601 Rev P4	1914-BG-01-00-DR-A-34.602 Rev P5	Kingsway Entrance Detail	1:20 @ A1 / 1:40 @ A3
1914-BG-01-ZZ-DR-A-20.301 Rev P4	1914-BG-01-ZZ-DR-A-20.301 Rev P5	Typical Core details	1:30 @ A1 / 1:60 @ A3
1914-BG-01-ZZ-DR-A-35.270 Rev P4	1914-BG-01-ZZ-DR-A-35.270 Rev P5	Proposed Historic Ceiling Detail - Ground Floor	1:50 @ A1 / 1:100 @ A3

## Proposed Non-Material Amendments

The non-material amendments to which this application seeks approval for relates to minor works throughout the building. The proposed non-material amendments are, as follows:

- a) **Basement Floor**
  - Amendment to the scope of drainage demolition amended to suit changing room layout
- b) **Ground Floor**
  - Alteration to layout of Soho Coffee Bin store (this part of Soho Coffee was included in the approved scheme)
  - Location of electrical riser in office space changed.
  - Reception design layout amended
  - New partition wall to Kingsway Entrance
- c) **First Floor**
  - Removal of 2 additional columns Grid C/4 and D/4.
  - Wall to secondary stair core pushed back in line with riser
- d) **Slab Demolition Scope: All Floors**
  - Reduction of slab demolition at GL B/3-6 and E/6-7
- e) **Slab Demolition Scope: Second Floor**
  - Additional slab demolition and re-instatement Grid B/3-5 to C/3-5
- f) **Slab demolition scope - 6th and Ground Floor**
  - Removal of areas of defective slab
- g) **Primary Core - all floors:**
  - Omission of firefighting lift and reconfiguration of risers
  - Movement of lift bank approx. 300mm towards GL 4 to avoid existing structure, and thus footprint of core is slightly reduced
  - Reconfiguration of WC's to suit
- h) **Secondary Core**
  - Movement of riser and structural core wall : Basement - 5th floor
  - Minor adjustments to stair layout and riser position to suit services and structural requirements: 5th - 7th floor
- i) **Roof**
  - New door to plant enclosure added.
  - Abseil anchor point and high-level walkway (within plant enclosure) added.
  - Terrace set back increased
- j) **External Finishes to new core extension 6F - Roof:**
  - Terrace and street facing walls finished in white render.
  - Plant -facing walls finished in grey metal cladding
- k) **Kingsway Entrance**
  - New soffit-mounted light

## Planning Context

Section 96A of the TCPA gives a local planning authority the power to grant changes to approved planning permissions if satisfied that the change is immaterial. There is no statutory definition of 'non-material', however this will be on a case by case basis and depends on the degree of change when viewed in the context of the

approved scheme. In order to grant an application under S96A, the Council must be satisfied that the proposed amendment is non-material.

### **Assessment**

In our view, when assessing the proposed non-material amendments, the scheme remains appropriate and acceptable. In summary:

- The proposed amendments are not considered to be material to the scheme
- The proposed amendments do not alter or result in a development that is of a scale or nature substantially different from that already been approved by the Council
- The proposed amendments do not alter the description of the development, nor do they alter the application site boundary
- The proposed amendments are in our view wholly acceptable and is uncontentious
- The amendments are minor and are not contrary to any development plan policies

### **Conclusion**

Overall, our opinion is that the proposed changes are not material when viewed in the context of the overall scheme and can therefore be considered as a non-material amendment. We therefore respectfully request that the application is determined favourably by the Council. We trust you have all the relevant information to register and validate the application; and that these non-material amendments will gain your Officers' support. We would be grateful if you could acknowledge receipt of this application and contact either, Raveen Matharu or myself.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Mike Washbourne", with a stylized flourish at the end.

**Mike Washbourne**  
**Director**