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FAO Kate Henry / Alex Bushell

5 July 2021

Our ref: LJW/ANE/KHU/U0005835

Your ref: PP-10014555

Dear Kate

**St Pancras Commercial Centre 63 Pratt Street, Camden, London, NW1 0BY
Non-Material Amendment Application, Town and Country Planning Act 1990 (as amended)**

On behalf of our client Camden Property Holdings Ltd we have been instructed to submit a Non-Material Amendment (NMA) application for amendments to planning permission ref. 2019/4201/P which have arisen as a result of detailed design development. These changes have been discussed during pre-application meetings held in December 2020, April 2021 and May 2021. The NMA submission has sought to address the points raised by officers throughout the pre-application process.

The changes described in the accompanying non-material amendment pack prepared by Caruso St John are largely a result of design development as the project approaches construction and further discussions are undertaken with building control, manufacturers and contractors.

Planning Permission under Section 96A of the Town and Country Planning Act 1990 (as amended) is therefore sought for:

‘Non-Material Amendment sought to planning permission dated 24th December 2020 reference 2019/4201/P (Demolition of existing buildings (Class B1c/B8); erection of 3x buildings ranging in height from 5 to 7 storeys above ground and a single basement level comprising a mixed use development of light industrial floorspace (Class B1c/B8), office floorspace (Class B1), 33x self-contained dwellings (Class C3), flexible retail floorspace (Class A1/A3); associated access and servicing, public realm, landscaping, vehicular and cycle parking, bin storage and other ancillary and associated works) namely to update the approved drawing list to capture detailed design changes, reorganisation of the building services layout at basement, ground and mezzanine level, changes to the cycle parking layout including the addition of 6no. spaces, changes to the escape strategy and to enable the installation of lighting to the balconies of the residential units under Condition 9 of the planning permission amongst other associated changes.’

The non-material amendments are described as follows:

1. Revised ground floor plan comprising:

- a) Relocation of the bin store to accommodate the addition of a transformer room at the request of UKPS
- b) The addition of an external door for access to the basement
- c) A revised entrance design of the doors to the residential and retail units

- d) An additional escape route from the office building to the north
- e) A revised stair arrangement to the stairs connecting basement, ground and mezzanine of the light industrial space
- f) A revised design of the revolving doors of the main office building
- g) Removal of the door between Pratt Street and the ground floor retail area
- h) Reconfiguration of the cycle store entrance, kitchen, bin store, escape routes and electrical transformer rooms

Following the grant of planning permission, further discussion with UKPS (United Kingdom Power Solutions) revealed that a further transformer room was required to serve the two residential buildings. This has been accommodated in the ground floor of the market residential block and the approved bin store has been relocated to the west to accommodate the change. This is identified on the plans in the design pack submitted.

Following advice from manufacturers with regards to access and security, the design and detail of the entrance doors to both apartment buildings and to the ground floor retail space have been developed. As such the application proposes a revised design. Additionally, the extant planning permission prohibits lights to be fixed or to be installed to the external face of building and so the proposed amendments seek an exception to this condition in accordance with the approved drawing list.

The extant planning permission includes a fire escape route from the office building passing through the internal street. However, the gates to the street at night are closed for security reasons. The proposed solution is an escape route from the office building to the north. There will be a very slight loss of light industrial space at ground floor level as a result, but the area is replaced at basement level resulting in a minor difference as shown in the area table included in the design statement.

The stairs connecting the basement mezzanine and ground floors in the light industrial units were originally designed as a straight stair. The subdivision of the units on the east side of the office building is flexible with multiple potential splits to suit varying tenant needs. The tenancy of the units is unknown at this stage and the design has been updated to reflect this, allowing for a void in the slab for a stair and lift and a soft spot for services. This allows for greater flexibility in how the units are divided. The final position and configuration of the stair, lift and services will form part of the future tenants' fit out. The updated drawing also shows steps into the units, these are temporary stairs as the tenant will install their own floor finish.

The application proposes an amendment to the design of the revolving doors on the main entrance to the office as a result of discussions with the manufacturer and the originally proposed doors not being available in the height originally proposed.

The application proposed the omission of a door to Pratt Street as it is not a requirement for the fire escape strategy and in order to meet accessibility standards, a 10m long ramp would be required to be installed to overcome the level difference.

It is proposed to reconfigure the back of house spaces including the cycle store entrance, kitchen, bin store, escape routes and electrical transformers to improve the functionality and operation of the spaces. These changes have very minor implications for the facades as demonstrated in the accompanying design pack.

2. Revised Mezzanine floor plan comprising:

- a) Revision to the area of mezzanine for plant maintenance updated to suit the maintenance strategy
- b) Light Industrial Cores updated to allow for the flexibility in the unit size and splits related to point [e] above.

The changes at mezzanine level comprise reorganisation of plant to suit an updated maintenance strategy. The rationale for the improvement of the light industrial cores has been described under the changes at ground floor level. Connected to the changes at basement level, this relates to the detailed design of the building services strategy.

3. Revised basement level comprising:

- a) Reorganisation of the plant room at basement level
- b) Addition of light industrial space at basement level
- c) Perimeter of the basement adjusted to simplify construction
- d) Revision to the cycle storage layout
- e) Revision to the light industrial cores again relation to point [e] above

Following the planning submission, the arrangement of the stair and lift access was altered to improve access and circulation and to provide a designated space for bicycle maintenance and a drying room for wet clothes. The approved scheme includes 228 long stay spaces in the cycle store, this has been increased to provide 234 cycle storage spaces of which there are 222 in two tier stands and 12 in Sheffield stands for non-standard bicycles. In addition, there are eight folding bike lockers which means there is provision for 242 bicycles overall. In addition, the changes at basement level mainly comprise internal reorganisation of space as identified in the design pack.

4. Revised First Floor Level comprising:

- a) Relocation of the M(4)3 unit
- b) Wall identified in the accompanying pack from Caruso St John moved out by 112mm at all levels to resolve brick setting out
- c) A very light reduction in office area of 7sqm due to the upstand beam over the internal street
- d) A reduction in the stone sizes over the whole building (office and residential) resultant of conversations with quarries and stone suppliers
- e) A reduction in the height of external residential windows as a result of the recent requirement to have sprinklers in all habitable rooms.
- f) The addition of external lighting to balconies

Following discussions with the approved inspector in relation to compliance with space standards as set out in part M for fully accessible dwellings, it became apparent that this originally intended unit was not suitable and therefore it is now proposed to amend the internal layout of one of the units on the western side of the building to make it fully accessible in compliance with Part M.

The site slopes from north to south, and the internal street also slopes to connect Pratt Street and St Pancras Way. To ensure there is sufficient clearance for a variety of large vehicles, including refuse collection, the beam in the north facade of the office building, which is spanning a double bay, has been pushed up into the floor plate of the first-floor office, maintaining a clear height of 4.1m. This is a subtle

change in the facade, but the upstand beam also reduces the internal area of the first floor by 7m² and this is reflected in the revised area table in the accompanying design pack.

In the original application, the stone spandrel panels were drawn as very large pieces (the full width of a window bay). Following discussions with a number of quarries and suppliers, the red sandstone elements have been reduced so that they can be sourced without reduced wastage.

Following the changes to approved document B in 2020. Residential buildings over the height of 11m are to have sprinklers in all habitable rooms. To incorporate this, the ceiling void in the living rooms, kitchens and bedrooms have been increased to contain the necessary sprinkler pipework and heads which influences the windows and doors. They have therefore been reduced in height by two brick courses. The internal daylight impacts of this has been tested and it is confirmed that there is no discernible difference.

Planning condition 9 attached to the extant permission prohibits the addition of external lights. This amendment application seeks to enable lighting to be installed on balconies to enable safe usage of the spaces after dark.

5. Changes at Fifth Floor Level:

- a) A reduction in the external circulation space at rooftop level
- b) Revisions to the internal layout of one of the apartment A-05-01 to improve the emergency escape strategy
- c) Revision to the internal layout of apartment A-05-02 to meet the requirements of the unit being fully accessible.

The internal layout of apartment A-05-01 has been reconfigured to as an improvement to the emergency escape strategy. In addition to this, the internal layout of apartment A-05-02 has been reconfigured to make the apartment fully accessible against the requirements set out in approved document M.

6. Changes at Sixth Floor Level

The eastern wall of the plant screen and been moved by 1.5m to the east to conceal the plant equipment associated with the affordable residential building.

7. Changes to the approved elevation and section drawings:

The majority of these changes are listed above but for clarity the elevation and section drawings have been amended for consistency. The changes are identified on in the accompanying design pack prepared by Caruso St John but primarily include:

- a) Slight relocation of a door on the St Pancras Way elevation
- b) On the Pratt Street elevation, the plans have been updated to show the door removed and the update to the elevational treatment so that it is more consistent over the three bays
- c) On the Royal College Street Elevation, the drawing has been updated to take account of the revised revolving doors design
- d) One the Georgiana Street elevation, the drawing has been revised to take account of the addition of the transformer room and the reduction of the window heights.
- e) Replacement of the glazing shown on section AA3 replaced with aluminium to conceal the back of house space escape spaces

Areas

The increase in residential areas by 74m² is a result of a combination of adjusting the building to fit brick dimensions combined with a general thinning of the façade construction as we have progressed the detail.

The increase in the office area by 62m² can largely be attributed to the adjusted escape route on ground floor to the north and changes in the basement plant rooms.

Application documentation

This Non-Material Amendment application comprises the following documents:

1. This covering letter;
2. Completed application forms;
3. Caruso St John Design Statement explaining the design amendments;
4. Caruso St John drawing set and revised schedule of drawings; and
5. Planning Application fee £234

The changes have been discussed with officers in detail prior to submission of the application and so we trust that the application is self-explanatory. However, should you have any queries, please contact Katie Hughes at the above office.

Yours sincerely

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