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**FAO: Kate Henry**

21 September 2021

**Our ref: LJW/KHU/SAV/U0005835**

**Your ref: 2019/4201/P / PP-10215224**

Dear Kate,

**St Pancras Commercial Centre, 63 Pratt Street, Camden, London, NW1 0BY**  
**Minor Material Amendment Application to Vary Planning Permission Ref. 2021/347/P**  
**Town and Country Planning Act 1990 (as amended) - Section 73**

On behalf of our client Camden Property Holdings Ltd we have been instructed to submit a Minor Material Amendment (MMA) 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 MMA submission has sought to address the points raised by officers throughout the pre-application process.

The proposals discussed in the accompanying design addendum pack which has been submitted with the application, have arisen as a result of design development and reorganisation of the plant strategy. This application follows a non-material amendment to the extant permission ref. 2021/347/P for a number of changes which were agreed to be non-material to the planning permission granted. As the changes proposed under this application materially affect the external appearance of the building, this application is submitted under Section 73 of the Town and Country Planning Act.

### **Relevant Planning History**

On 24<sup>th</sup> December 2020, full planning permission (ref: 2019/4201/P) was granted for the following:

**“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.”**

On 18<sup>th</sup> August 2021 planning permission (ref: 2021/3447/P) was granted at the site for the following:

**“Non material amendment to include changes to openings and elevational details; alteration to plant screen on 6th floor of affordable housing block; internal changes at basement, ground, mezzanine, 1st, 5th and 6th floor levels, including reorganised layouts; adjustment to perimeter of basement; revised commercial cycle store layout; change of M(4)3 unit in market residential block, approved under planning permission 2019/4201/P, dated 24/12/2020 (for:**

**Demolition of existing buildings and erection of new buildings to re-provide light industrial floorspace, provision of office space, self-contained dwellings, flexible retail space, associated access and servicing, public realm, landscaping, vehicular and cycle parking, bin storage and other ancillary and associated works)."**

All pre-commencement planning conditions have been approved and the planning permission has been implemented.

### **Pre-Application Advice**

Pre-application advice on the proposals was received from Camden planning and design and conservation officers in December 2020, April 2021 and May 2021. The advice received was in respect of both the proposals approved by the recent NMA and the changes that are the subject of this application.

The advice received considered that the proposed changes were acceptable in principle and it was agreed which proposals were considered to be non-material and minor material in nature.

### **Proposals**

This application seeks planning permission for the following:

**"Variation of Condition 2 (Approved Drawings) and Condition 9 (Externally Mounted Equipment) of planning permission ref. 2019/4201/P for 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, to enable changes at 6<sup>th</sup> and 7<sup>th</sup> floor level to the office building to accommodate a revised plant strategy and additional external amenity space and to enable the installation of lighting to the residential balconies and entrances and to the retail unit.**

#### 1. Installation of downlights to the residential entrances at ground floor level

The design and detail of the entrance doors to both apartment buildings and to the ground floor retail space have been developed incorporating advice from the manufacturer on access and security. A light is needed to ensure that the faces of visitors using the entry phone are visible.

Condition 9 of the Planning permission prohibits lights placed on the external face of the building. We are therefore seeking an amendment to the planning permission to enable the installation of these lights which are necessary from a security perspective. Similarly, a light is proposed to be installed in the entrance of the retail unit to discourage anti-social behaviour in the recessed doorway at night-time. These changes are detailed in the addendum DAS submitted.

#### 2. Installation of residential lights to the balconies

Lighting is required on the residential balconies so that these spaces can be used safely after dark. The proposed fitting would direct light down, illuminating the surface of the wall and the floor and will supplement the light spilling from the apartment interiors without producing a direct visible light which would be a nuisance to neighbours and impact their amenity. We think this is a reasonable design solution and would like it to be considered as a revision to the application.

To accompany changes proposed in respect of lighting, detailed specification sheets have been submitted with the application.

As a result of amendments described under point 1 and 2, Condition 9 of planning permission 2019/4201/P would need amending to read:

**'Notwithstanding lighting permitted by plan refs: 477\_CSJ\_00\_ZZ\_EL\_A\_3300\_D2\_P04, 477\_CSJ\_00\_ZZ\_EL\_A\_3301\_D2\_P04 & 477\_CSJ\_00\_ZZ\_SC\_A\_3201\_D2\_P04 no lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the buildings.'**

### 3. Amenity space at 6<sup>th</sup> floor level

Planning permission was granted for the provision of a shared amenity space for building users on the sixth floor of the office building. This was available to all office tenants but was principally intended for the use of tenants on levels 1, 2 and 3 who do not have direct access onto external terraces. It is proposed that the size of the space is increased by 54m<sup>2</sup> to create a more useful interior space with a small kitchen and store to facilitate events.

The larger space facilitates changes in office working culture following Covid-19 which has seen an increase in the demand for flexible workspace provision. The increased area displaces some plant equipment and exhaust ducts. Tenant expansion plant equipment is located to the north of the 6th floor. These units will be at low level only and will not be visible above the roof parapet. Larger bulky items are moved to the 7th floor and concealed within the extended plant enclosure.

The openings on the south elevation of the 6th floor have been updated with an additional door and window. Provision is made for lighting along the south elevation to allow the terrace to be used in the evening. In addition to this it is proposed to locate visual and audio beacons on all terraces (4th, 5th & 6th floors) for the purposes of emergency escape.

### 4. Seventh floor plant space

Following the reorganisation of the plant strategy, some elements of plant have been moved to the 7th floor level. To accommodate this, the north edge of the plant enclosure has been extended by 2.5m. This change was presented during pre-application meetings to officers and the verified views have been updated to demonstrate the visual impact. A side-by-side comparison of the views is included in the addendum DAS. It is considered that the impact of this change in the views from the street are minimal and barely noticeable.

In addition, an addendum acoustic report has been prepared by Hann Tucker Associates and has been submitted with the application to demonstrate the acoustic implications for the revised plant strategy.

The assessment indicates that the proposed plant, in conjunction with the proposed attenuation, should be capable of achieving the proposed environmental noise criteria at the nearest noise sensitive residential windows.

**To accommodate the changes proposed under points 1-4, Condition 2 needs to be amended to update the approved drawing list cited.**

## 5. Variation of Condition 15 relating to cycle parking

Application ref. 2021/3447/P permitted additional cycle parking and increased the provision from 228 to 234 long stay spaces. There are no further changes proposed as part of this application though for consistency, the wording of the condition which specifically references quantum of spaces should be revised to read:

**'The approved cycle storage facilities for the residential (26 for the affordable block and 35 for the market block) and office uses (234 spaces) shall be provided in their entirety prior to the first occupation of any of the new residential units / commencement of the commercial uses (as appropriate), and permanently retained thereafter.'**

### Revised Areas

The proposed areas have changed since the approval of the planning permission for the following reasons owing to the additional amenity space at 6<sup>th</sup> floor level:

Land Use	Approved (GIA sqm)	Proposed (GIA sqm)	Total (GIA sqm)
Light Industrial (Class B1c) and Storage and Distribution (Class B8)	3,273	3,273	0
Office (Class B1a)	16,588	16,642	+54
Retail (Flexible Class A1 and A3)	764	764	0
Residential (Class C3)	4,083	4,083	0
<b>Total</b>	<b>24,708</b>	<b>24,762</b>	<b>+54</b>

### **Conclusion**

The proposed amendments to the approved development will deliver the following benefits to the site:

- i. Improving the design, safety, function and operation of the completed development;
- ii. Installation of additional lighting to the residential entrances, balconies and the retail unit to improve the security strategy of the approved development and discourage antisocial behaviour; and
- iii. Improving the internal and external amenity provision for office tenants to improve the useability of space and to respond to changes in office culture and wellbeing provision following the Covid-19 pandemic.

### **Submission Documents**

In support of this application, the following documents have been submitted electronically via planning portal (ref: PP-10215224):

- Completed application form and certificates;

- CIL Form, prepared by Gerald Eve LLP;
- Site and Site Location Plan; prepared by Caruso St John;
- Approved plan, section and elevation drawings; prepared by Caruso St John;
- Proposed plan, section and elevation drawings, prepared by Caruso St John;
- Design and Access Statement Addendum, prepared by Caruso St John;
- Noise Impact Assessment Addendum Report, prepared by Hann Tucker Associates; and
- Lighting Specification Sheets.

The application fee of £234 has been made concurrent to the submission of this application.

We would be grateful if you could confirm receipt and validation of this application. In the meantime, please contact Katie Hughes (0203 486 3494) or Sam Aviss (020 3486 3524) of this office should you have any questions.

Yours faithfully



**Gerald Eve LLP**

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