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London Borough of Camden  
Camden Town Hall  
London  
WC1H 8ND

5 October 2022

Dear Sofie,

**CAMDEN GOODS YARD, CHALK FARM ROAD, NW1 8EH**  
**NON-MATERIAL AMENDMENT TO PLANNING PERMISSION REF: 2020/3116/P**  
**S.96A TOWN AND COUNTRY PLANNING ACT 1990**

Further to pre-application discussions, we write enclosing an application for non-material amendments ("NMA") to Planning Permission ref: 2020/3116/P ("Planning Permission") under Section 96A of the Town and Country Planning Act 1990.

The NMA relates to Blocks A, B and C of the Camden Goods Yard Main Site. More detail summarising these changes is provided in this letter.

**1. Planning Considerations**

S96A of the Town and Country Planning Act 1990 gives the local planning authority the power to make non-material changes to planning permissions. There is no statutory definition of 'non-material'. It is a matter of fact and degree dependent on the context of the whole development as approved.

In the context of the main site and wider Camden Goods Yard development, the amendments proposed through this application are not considered to be material to the approved scheme, and we therefore consider they can be dealt with by way of a non-material amendment application.

The scale and appearance of the proposed Blocks A, B and C on the Main Site remain as approved.

**2. Enclosed Information**

The following four sets of documents are submitted in support of this application:

- Completed application form
- Existing Location Plan
- Drawings schedule – capturing approved and drawings for approval.
- Drawings – as three sets:

- Approved Drawings (references in drawings schedule enclosed)
- Proposed Drawings with mark ups identifying location of the changes (“the cloud drawing set”). Supporting information on changes proposed.
- Proposed Drawings for approval (references in table below)

### **3. Planning History**

On 15 June 2018 full planning permission (ref: 2017/3847/P) was granted (the “Original Permission”) for the redevelopment of the 3.26 hectare site known as Camden Goods Yard, located off Chalk Farm Road.

Subsequently, a S96a non-material amendment was approved by Camden Council on 6th February 2019 (2019/0153/P). This altered the wording of Conditions 47, 48 49 to split out the requirements from these conditions into the PFS and Main Site.

On 24 December 2019, the description of development of the Original Permission was amended pursuant to section 96A of the 1990 Act (decision reference 2019/6301/P).

On 5 May 2020 a Section 73 application (ref: 2020/0034/P) was granted approval for variation of Condition 4 (approved drawings) for redevelopment of the petrol filling station site and main supermarket site; namely for a single storey temporary food store on the Petrol Filling Station site with associated parking, servicing, access and landscaping.

A S96a non-material amendment was approved by LBC on 9 July 2020 (2020/2786/P) which altered the description of development for planning permission ref. 2017/3847/P dated 15/06/2018 (as later amended by 2020/0034/P dated 5/5/2020).

On 3 December 2020, a Section 73 application (ref: 2020/3116/P) was granted for variation of Conditions 3 (approved drawings) and 73 (number and mix of residential units) of planning permission 2020/0034/P for 71 additional homes.

On 23 February 2022, the description of development of the planning permission was amended pursuant to section 96A of the 1990 Act (decision reference 2022/0673/P).

### **4. Proposed Non-Material Amendment**

Several non-material amendments to Planning Permission ref: 2020/3116/P are proposed in respect of the Camden Goods Yard main site to Blocks A, B and C.

The proposed enhancements are a result of detailed design work for these blocks, input from office agents and Morrisons operational requirements.

We have provided a short explanation for the key changes in this letter. These should be read alongside a set of marked up drawings ('cloud drawings') provided as part of the application identifying where the changes are located.

### **Block A Changes**

There are eight proposed changes to Block A:

1. Morrisons car park entrance (north west elevation): The consented design contains a roller shutter controlling access to the Morrisons car park. The consented elevation is missing a panel to conceal a downstand beam above the vehicle ramp. This would mean the building is not supported structurally at upper levels and is therefore undeliverable. The panel is also needed to conceal a metal shutter which is also missing from the approved drawing. A metal panel to the façade above vehicular entrance to car park has been added across the full width of structural opening. This minor change has been agreed through pre-app discussions with LBC.
2. Roof parapet: The handrail drawn on consented planning drawing does not achieve the minimum 1.1m height in accordance with building regulations. The planning drawings have been amended to increase height of roof parapet level by approximately 330mm but set back to mitigate any visual increase in height. The non-compliant handrail has been omitted. Omitting the balustrade interface also reduces significant risk of water ingress and leaks. This minor change has been agreed through pre-app discussions with LBC.
3. Retail doors (north east elevation) and residential entrance doors (north west elevation): Design work linked to the Stephenson Street road upgrade to adoptable standard and adjacent landscaping means that the consented design cannot deliver accessibility compliant levels around Block A level access for pedestrian access and fire tenders. External ground levels are very challenging to tie into required highways levels in this area whilst providing a Part M compliant route around Block A. With respect to the north east elevation retail unit doors, if the consented door position were to remain it would require new a landing, introduction of a ramp and steps with a balustrade in front, compromising pavement width and required fire tender access. This will also make the landscape more cluttered. Two retail doors have been moved from the outer bays centrally to the inner bays. This change has been agreed with LBC through pre-app discussions. With respect to the residential entrance on the north east elevation, to achieve Part M compliant levels and meet LBC highway requirements for an adoptable standard highway design, the entrance door has moved one glazing bay along (east).
4. Revised roof plant enclosure: The design at planning stage was based on plant being located on the top of the stairwell and lift over run to both Block A1 and A2. This was not shown correctly on the planning elevations. Plant on the

top of Block A cores would therefore marginally protrude outside the approved plant enclosure envelope.

On Building A1 the plant has been maintained within the consented plant enclosure height. The plant enclosure has been widened by 3,000mm to accommodate plant alongside a minor adjustment to the flue location.

Core A2 is not able to accommodate plant is proposed to be increased by 850mm above the NW tower plant enclosures due to there being no roof space to widen the enclosure due to other requirements such as PVs. An increase of 850mm to plant enclosure height is therefore required alongside a minor change to flue location.

These minor changes have been agreed through pre-app discussions with LBC.

5. Gym plant door (south west elevation): The consented proposals omitted an access door to the gym plant room. Access cannot be taken from the office cycle store due to a downstand beam in wall separating gym plant room. There is no other means of reaching the gym plant room other than by creating new access as proposed. Both spaces are also part of different demises. Fourth bay change from hit and miss brickwork to include plant room door and louvres to match building window RAL colours (grey). External access stair provided. Fifth (end) bay changes from Flemish bond brickwork to hit and miss brickwork. Bricks remain the same. Hit and miss will make the bay detail consistent with the other bays. This minor change has been agreed through pre-app discussions with LBC.
6. Spandrel panels (north west, north east and south east elevations): Approved layouts for some of the private homes in Block A have cupboards or kitchen cabinets behind the windows. To achieve building regs compliant layouts the cupboards and cabinets cannot be moved. The spandrel panels will conceal fixed fittings behind the affected windows. The spandrel panels are in the form of back painted glass which will match the tone of the windows and building. This approach ensures the visual appearance of these elevations is retained. This minor change has been agreed through pre-app discussions with LBC.
7. Office façade, internal updated and relocation of terrace stairs: Having reviewed the office occupier journey and end of journey facilities with St George's office agents Cushman & Wakefield, a number of minor enhancements were proposed and agreed with LBC which would improve the quality of the office space in Block A:
  - a. Relocation of external stair within the first floor office terrace internally to within the office lobby serving ground-first floors, adjacent to lift.
  - b. Reconfiguration of office cycle parking and facilities at ground floor with direct access to lobby providing greater space for end of journey

changing and shower facilities, supporting sustainable modes of travel. Cycle space provision remains as consented for residential and office.

- c. Office entrance doors have been changed from single to double to create a more welcoming entrance. The double door design remains consistent with an office double door detail on first floor terrace.
- d. The office terrace doors have changed from traditional outward opening to sliding doors on both office terraces to provide more flexible access internal and externally for example during warmer months and for events, maximising the use of this amenity space.

These minor changes have been agreed through pre-app discussions with LBC.

- 8. Additional terrace door to gym (south east elevation): A new double door is proposed between the gym and south terrace for two reasons. This will provide access to external amenity space for gym users. Secondly, to provide independent access for façade cleaning and maintenance operatives out of hours, meaning access would not be required via the office demise. The door and bay detail replicates the approved design as both office lobbies. In terms of how the terrace space will be used and closed off as queried by LBC, the terrace will be accessible to gym users during opening hours with some seating and tables anticipated being provided. The extent of terrace available to gym users remains the same as the extent of the gym along this elevation. LBC queried in pre-app how the terrace space is delineated between users. It is proposed that the gym and office terrace is delineated by planters which provide a high quality soft-green screen between users. These provide the flexibility to be move if needed for maintenance, meaning no fixed features being added.

## **Block B Changes**

### **1. North Elevation:**

- a. Morrisons customer entrance: Morrisons have requested minor updates to the configuration of their entrance doors across the four arch bays to the north elevation. This is to ensure that access aligns with the operating requirements for the store and a proposed cafe. In short the proposals include an additional set of doors in one of the arches meaning 3 of the 4 arches are activated instead of 2, a positive change and improvement on the consented design. The revised proposals are therefore summarised as follows:
  - Arch 1: Double doors serving a café directly inside inserted with mullion detailing updated.
  - Arch 2: Consented doors removed with mullion detailing updated.

- Arch 3: Double doors serving as the entrance/exit to the new store inserted. Mullion detailing updated.
  - Arch 4: Double doors serving as the entrance/exit to the new store retained. Mullion detailing updated.
- b. Morrisons HGV entrance: Vehicle tracking on the proposed façade during detailed design has highlighted a pinch-point against the consented elevation arch detail located directly above the HGV entrance. To mitigate the potential for vehicle strikes various design options were developed to provide sufficient height and width for Morrisons HGVs. These included widening the arch, raising the arch or creating a rectangular opening. These options were presented to LBC who confirmed that (i) agreed in principle the change was needed and (ii) a raised height arch detail retained option was preferred. St George have incorporated this detail into the NMA for approval.
- Lifting the arched head of the HGV entrance provides much more tolerance for the HGVs which should enable the vehicles to enter and exit the Morrisons service yard more efficiently.
2. Second Urban Farm lift: St George has undertaken significant work over the past 18 months to develop proposals for the roof top Urban Farm on Block B and kept LBC regularly updated on progress. The Urban Farm proposals comprise food growing space alongside a café-restaurant in line with the consented scheme. St George has undertaken extensive discussions with both food & beverage and food growing operators to identify minimum design requirements to enable the Urban Farm to operate and trade successfully. All operators spoken to raised the minimum requirement for a second lift to provide continuity of service to operations and trading in the event one lift breaks down. Should no lift be in service, the Urban Farm will not be able to operate. Secondly, the second lift will enable one lift to act as a service lift whilst the other can be used for front of house for visitors. The minor proposed change to the design comprises widening slightly the existing lift tower to enable a second lift to be slotted next to the existing consented lift. Access at roof level will continue to be taken via the consented walkway. This change has been agreed with LBC through pre-app discussions in September 2021.
3. Office internal reconfiguration, cycle parking and LV switch room: Having reviewed the office occupier journey and facilities with St George's office agents Cushman & Wakefield, a number of minor enhancements are proposed and agreed with LBC which would improve the quality of the office space in Block B making Camden Goods Yard an attractive place to work. The following changes have been agreed with LBC:
- Cycle parking improvements:
    - Residential: Relocation of 56 standard and 2 accessible Core B1 residential cycle spaces to the Cycle Hub under Block C and adjacent to the Affordable Workspace.



- Residential: The remaining Core B1 resident 72 standard and 3 accessible cycle spaces will be retained in Building B.
- Office: 14 standard (plus 4 additional spaces provided) and 1 accessible office cycle parking spaces will be relocated to Building B from the Cycle Hub.
- This will ensure a better distribution of cycle spaces and maximising use of available space in Block B, promoting sustainable means of travel to work for cycle users where take up will be high. The reconfigured cycle parking also now includes a low voltage (LV) electrical switch room for the office, fire cupboard and bin store. This change has been agreed through pre-app discussions with LBC.

	Consented Position		Revised Split	
	Standard Spaces	Accessible Spaces	Standard Spaces	Accessible Spaces
<b>Block B</b>				
Residential	128	5	72	3
Office	0	0	4	0.5
<b>Total</b>	<b>128</b>	<b>5</b>	<b>76</b>	<b>3.5</b>
<b>Cycle Hub</b>				
Residential	0	0	56	2
Office	14	1	18	0
<b>Total</b>	<b>14</b>	<b>1</b>	<b>74</b>	<b>2</b>

#### 4. East elevation:

- New substation relocated to lower ground of Block B (east elevation) from Block C (ground floor): A substation in Block C (ground floor) needs to be relocated to Block B to provide power to Block B and the Affordable Workspace units. This is due to Block C being delivered slightly later. It is not possible to provide power to Block B and affordable workspace in time for occupation without this change. The elevational change relates to the third arch within the east elevation at ground level. This comprises inserting a louvered detail instead of the existing consented curtain walling with windows. We have considered comments from LBC which queried whether the two louvered arches could be located together. Unfortunately due to the location of the office escape stairs, structural columns and strict utility provider technical specification requirements for the substations on space dimensions and louvres, it is not possible to locate existing and newly inserted substations together. We have commented on the changes relating to the removal of the substation in Block C in a separate section for this block.
- Ground floor arches to Morrisons upper level demise: Morrisons require their internal plant room to be marginally extended by 9m along the east elevation to meet operational requirements for the store. This requires changing the third and fourth arches of the elevation to louvres.

- First floor windows to residential and office: Minor changes are required to the first floor window of the residential accommodation. The window positioning has been adjusted very slightly to allow a structural load path to be achieved whilst retaining the same visual appearance as the consented building. A change has also been made to an adjacent office window which is changing to an inset brickwork detail. This is to avoid a clash with the internal party wall between the office and residential properties in this location, whilst maintaining the rhythm of the fenestration at this level.
5. Roof (all elevations) and south terrace balustrade: Following detailed design review the consented balustrade height as drawn is not building regs compliant for publically accessible areas. Secondly, there is a compliance requirement for a maximum of 100mm opening which requires vertical bars to be added alongside the horizontal bar. These areas form part of the Urban Farm and communal residential terrace respectively. The planning drawings have been amended to reflect the correct balustrade height and to the compliance requirement for maximum 100mm openings.
6. West elevation: Minor elevational changes have been made in the following locations in agreement with LBC through pre-app:
- Morrisons need to introduce a service riser behind the façade and within their demise forming part of their staff entrance. The proposed change requires the introduction of back painted glass to small section of existing glazing.
  - Incoming services cupboard: In order to service Block B with utilities from the energy centre in the basement, a riser has been inserted behind the façade between the ground office lobby and separate office unit. This requires a minor fenestration change in the form of changing from vision glazing to back painted glass, to match the tone of the existing.
  - Work on the detailed structural strategy and column positions needed to deliver load paths revealed a clash with one 2nd floor window (see cloud plan for east elevation). Minor adjustment required to window positioning to deliver consented facade. At ground floor level directly below the window minor changes have been made to the curtain fenestration to remove a small section of louvres to a residential cycle parking and utilities cupboard. This is an improvement and contributes to improving the activation of the elevation.
7. South Elevation: Work on the detailed structural strategy and column positions needed to deliver load paths has revealed a clash with two first floor windows above the Urban Farm entrance. Minor adjustment made to central window positioning outwards across first to sixth floors to deliver consented facade.



**Block C Change (South East Elevation)**

There is one proposed change to at ground floor level which relates to the relocation of the consented Block C substation to Block B. This is discussed earlier in this letter. The existing substation has been replaced by extending the adjacent retail unit by 5.4 sqm. This also allows the consented louvered area of the former substation to be changed to glazing. This positive change delivers additional active frontage to the south east elevation and additional commercial space will be well received by occupiers. This should be read alongside any change in active frontage to Block B.

A payment for £234 +VAT to cover the requisite application fee has been made online via the Planning Portal. Planning Portal Ref: PP- 11578276.

I trust that the information provided will enable this NMA to be validated and I look forward to confirmation in due course. If you have any queries or require further detail to determine this application please do contact me on 020 7471 4444 or [richard.syddall@stgeorgeplc.com](mailto:richard.syddall@stgeorgeplc.com)

Yours sincerely.

Richard Syddall  
**Senior Development Manager**  
**St George West London Limited (SGWL)**