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Planning Department  
London Borough of Camden  
2nd Floor, 5 Pancras Square  
C/O Town Hall, Judd Street  
London  
WC1H 9JE

21 January 2025

Our Ref: 6410

Dear Sir/Madam,

**The Camden Centre, Camden Town Hall, 5 Judd Street, London WC1H 9JE – Listed Building Consent for the provision of a ‘new dumbwaiter between second and third floor’.**

On behalf of our client, Eventhia Ltd, please find enclosed an LBC application for the provision of a new dumbwaiter between L02 (Room 2.26 Store) and L03 (Room 3.16) to Camden Town Hall, within the ‘Bidborough Works’ demise.

The proposals are associated with works granted under approval of Listed Building Consent (LBC) application reference 2024/0464/L dated 21.05.24. This element of the works is necessary to enhance the commercial floorspace by subtly improving its functionality, allowing the transportation of food, beverages, and other items between floors.

The £76m refurbishment of Camden Town Hall took place in May 2023 as a result of base build application (2019/2257/L) approval. This allowed for the sensitive restoration of the Grade II listed building, sustainability enhancements, investment to provide lettable commercial space at basement, second and third floor levels, as well as refurbishment of the Camden Centre to provide lettable event space. This has been followed by a series of applications to allow for a complementary fit-out, to enable, Il Bottaccio, the future leaseholder of the Camden Centre, to re-occupy the floorspace for the long term.

The following applications were approved in 2024:

Ref. No	Proposal	Decision	Date
2024/0464/L	Internal alterations including works to facilitate acoustic improvements and installation of event AV and lighting, removal of dumbwaiters, new plant and adjusted ducting routes, relaying of areas of flooring and general internal refurbishment.	Granted	21-05-2024
2024/0712/P	External alterations to windows to connect updated servicing arrangement and installation of rooftop plant within existing	Granted	24-07-2024

Managing Director  
Helen Cuthbert

Associate Director  
Niall Hanrahan

Directors  
Stuart Slatter | Dan Templeton

2024/1389/L	Internal alterations for new workspace fit-out at basement, ground, second, third and fourth floor. External alterations to windows to connect updated servicing arrangement and installation of rooftop plant within existing enclosure.	Granted	24-07-2024
2024/3974/L	Details submitted in relation to condition 4 (detailed drawings and samples) of approved application 2024/0464/L dated 21st May 2024 (for: Internal alterations including works to facilitate acoustic improvements and installation of event AV and lighting, removal of dumbwaiters, new plant and adjusted ducting routes, relaying of areas of flooring and general internal refurbishment.	Awaiting Decision	
2024/5584/P	Removal of small section of pavement light slab below grating on the Tonbridge Walk elevation.	Awaiting Decision	
2024/5763/L	Removal of small section of pavement light slab below grating on the Tonbridge Walk elevation and erection of new wall at basement level.	Awaiting Decision	
2024/5774/L	Internal alterations to Camden Centre including installation of platform chair lift.	Awaiting Decision	

### Heritage Legislation

- 1.1. The Planning (Listed Buildings and Conservation Areas) Act 1990 is the primary legislation and foundation on which further policy, and guidance relating to the conservation of the historic environment is built. Section 66 of the Act relates to the 'general duty as respects listed buildings in exercise of planning functions', with Section 66 (1) stating that when deciding whether to grant planning permission for a development, special regard must be given by the local authority to the "desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses".
- 1.2. Section 66 (2) of the Act states that "a local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings".

### NPPF (2024)

- 1.3. The National Planning Policy Framework, with which all Local Development Plans must comply, constitutes the national level of planning policy and is a material consideration in planning decisions. The NPPF was originally introduced in March 2012 and was subsequently updated and published on 24 July 2018. The 2018 update broadly retains the wording of the 2012 Chapter on Conserving and Enhancing the Historic Environment (Chapter 16).
- 1.4. The NPPF was updated again in February 2019 in order to provide definitions for housing need. No paragraph numbers changed as a result of this update. Similarly, an update was published in July 2021, September 2023 and December 2023. The most recent update was published on 12 December 2024.
- 1.5. The NPPF represents a continuation of the philosophy contained within Planning Policy Statement 5 (PPS5), introduced in 2010 and one of a number of planning policy documents replaced by the NPPF in 2012.

- 1.6. The NPPF uses slightly different terminology to the Act and emphasises that authorities should take account of “the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation” (Paragraph 210).
- 1.7. ‘Conservation’ is defined within the NPPF as “the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance” (p.72).
- 1.8. No definition of ‘preservation’ (or any variant) is contained within the document. However, Historic England advise that both ‘conservation’ and ‘preservation’ are concerned with the management of change which seeks to sustain the special interest or significance of heritage assets. ‘Conservation’ has the addition of taking opportunities to enhance significance where it is possible and considered to be appropriate. This is discussed in Historic England’s 2018 publication Decisions: Legal Requirements for Listed Building and Other Consents.
- 1.9. The NPPF also helps to define other key terms within heritage policy. These are provided within the table below.

Term	Definition
Heritage Assets	“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).” (p.73)
Designated Heritage Assets	“A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.” (p.72)
Significance	“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.” (p.78)
Setting of a Heritage Asset	“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.” (p.78)

- 1.10. Chapter 16 specifically relates to conserving and enhancing the historic environment (paras. 202 - 221).
- 1.11. Paragraph 207 stipulates that within applications, applicants are required to describe the significance of the heritage assets affected and the contribution made by their setting. Local authorities should also identify and assess the significance of the heritage assets affected by a proposal.
- 1.12. This should be taken into account when assessing the impact of a proposal on a heritage asset. Paragraph 203 of the NPPF goes on to state that when determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
  - c) the desirability of new development making a positive contribution to local character and distinctiveness; and

d) opportunities to draw on the contribution made by the historic environment to the character of a place. (p.59)

1.13. Paragraphs 212-221 of the document discuss how potential impacts to heritage assets should be considered with Paragraph 112 stipulating a requirement for great weight to be given to an asset's conservation when considering the impact of a proposed development on its significance. The weight given should reflect the importance of the asset (p.60).

#### **NPPF Degrees of Harm**

1.14. Where harm to the significance of a designated heritage asset is identified, the NPPF requires clear and convincing justification of the proposals. The document categorises levels of harm as: total loss; substantial harm; and less than substantial harm.

1.15. Paragraph 214 states that where a development would lead to substantial harm to (or total loss of) the significance of a designated asset, local planning authorities should refuse consent, unless it can be demonstrated that such harm is necessary to achieve substantial public benefits that outweigh that harm, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

1.16. Paragraph 215 states that where a proposed development will lead to less than substantial harm to the significance of a designated asset, this should be weighed against the public benefits of the proposal, including securing its optimum viable use.

1.17. In the case of impact on non-designated heritage assets, Paragraph 216 states that a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

#### **Planning Practice Guidance (PPG)**

1.18. The PPG offers guidance as to what public benefits may constitute and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework. Public benefits may include heritage benefits, such as:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long-term conservation

#### **London Plan (2021)**

1.19. Policy D5 - Inclusive Design - Requires development proposals to achieve the highest standards of accessible and inclusive design, including being designed to take into account London's diverse population; provide high quality people focussed spaces that are designed to facilitate social interaction and inclusion and be convenient and welcoming with no disabling barriers.

- 1.20. Policy HC 1 - Heritage Conservation & Growth - Seeks for development proposals affecting heritage assets, and their settings, to conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

#### **Camden Council Local Plan (2017)**

- 1.21. Camden Council's Local Plan (2017) covers the plan period from 2016-2031 and sets out the Council's vision for the borough.
- 1.22. **Policy D2 'Heritage'** states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

#### **Listed Buildings**

- 1.23. The local planning authority will seek to preserve or enhance the borough's listed buildings, the Council will:
- i) resist the total or substantial demolition of a listed building;
  - j) resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
  - k) resist development that would cause harm to significance of a listed building through an effect on its setting.

#### **Camden Design SPG (2021)**

- 1.24. The Camden Planning Guidance covers a range of topics (such as heritage, housing, sustainability, amenity and planning obligations).
- 1.25. The overarching design messages underline the council's commitment to excellence in design and that schemes should consider:
- The context of a development and its surrounding area;
  - The design of the building itself;
  - The use and function of buildings;
  - Using good quality sustainable materials;
  - Creating well connected public spaces and good quality public realm
  - Opportunities for promoting health and well-being
  - Opportunities for improving the character and quality of an area
- 1.26. Section 3 of the SPG considers heritage design. Its key messages are:
- Camden has a rich architectural heritage, and we have a responsibility to preserve, and where possible, enhance these areas and buildings.
  - Most works to alter a listed building are likely to require listed building consent.

- The significance of ‘Non-Designated Heritage Assets’ (NDHAs) will be taken into account in decision-making.
- Historic buildings can and should address sustainability and accessibility.
- Heritage assets play an important role in the health and wellbeing of communities.

### Significance of Heritage Assets

The proposals are entirely internal and the only heritage asset that could be affected is Camden Town Hall (Grade II – list entry number 1379162). The building was listed on 19<sup>th</sup> April 1996.

The significance of the heritage assets has been outlined in great detail as part of applications 2019/2257/L and 2024/0464/L and does not need to be repeated again in full to contextualise the amendments proposed under this application.

It is nonetheless worth reiterating that the affected spaces of this application are outside of the most significant civic areas in the building, representing the historically more functional and secondary spaces for the Town Hall staff.

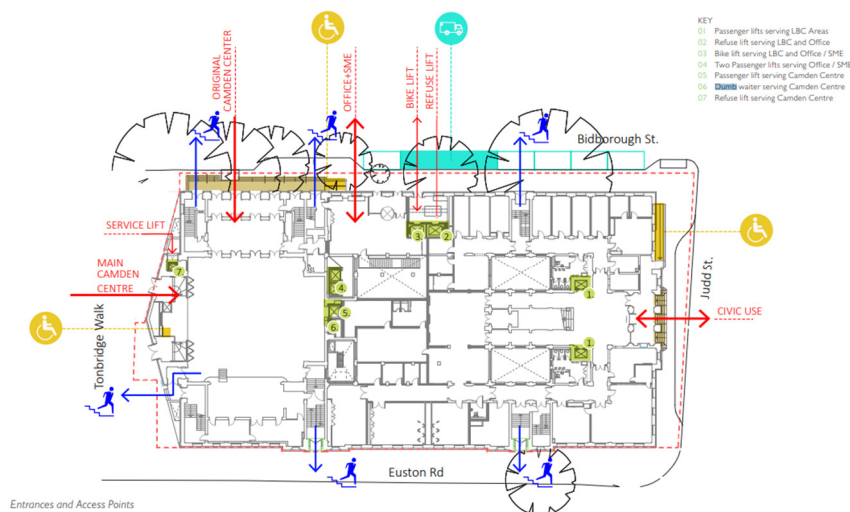
The upper floors were primarily built as offices for the council to deliver its various municipal functions. They therefore have a lower level of decoration than the principal public facing areas at ground and first floors. They have also undergone greater evolution than the ground and first floors below, in particular changes to partitions and plan form, as well as modern suspended ceiling and ventilation to facilitate workspace as part of the base build.

The overall significance of the second and third floor levels is lower than the principal ground and first floors. These levels have been in supporting office use and have a lower level of decorative finish. However, some simple architectural details, such as skirtings and doors survive, along with parquet flooring and other original finishes.

### Vertical Circulation as Part of 2019/2257/L Permission

Dumbwaiters, as well as other vertical circulation routes, have been integral elements in buildings of this type, use, period, and style. As a 1930’s listed building, the town hall was constructed with technological advances in mind, including progressive M&E systems, and a new dumbwaiter would not be anathema to the historic rationale of the building.

They have been previously approved within the Town Hall demise, most recently, as part of the base build application (2019/2257/L) approval. Below is the proposed Ground Floor base build plan, highlighting the approved vertical routes within the most significant floor space of the demise.

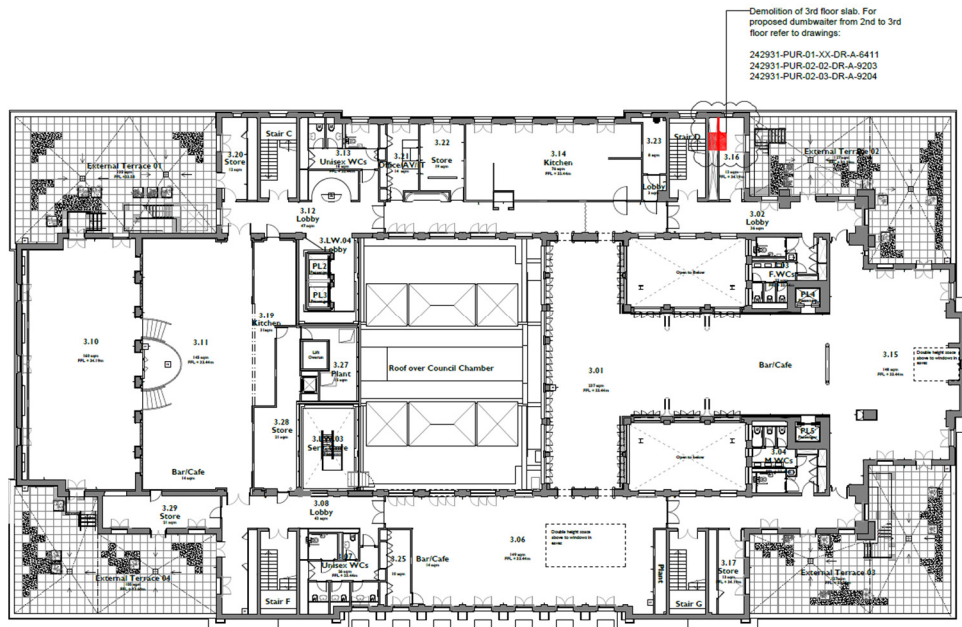


The justification for this proposal was provided in the 2019/2257/L Design and Access Statement and states: "A new passenger lift and pair of dumbwaiters will be installed below the western gallery and extend between Basement and First floor gallery level. The area identified for this more intrusive intervention is an area where the level of change had already led to a significant loss of original fabric; The expression of the new lift doors and 2x dumbwaiters would be sensitively designed to be in keeping with the character of the Camden Centre interior and would appear as a clearly modern addition."

### New Dumbwaiter between L02 (Room 2.26 Store) and L03 (Room 3.16)

A new dumbwaiter is proposed for the Bidborough Works demise of Camden Town Hall. It is proposed to be installed between rooms L02 (Room 2.26 Store) on the second floor and L03 (Room 3.16) on the third floor. These rooms are back of house areas which already contain connecting risers providing vertical connection for services and goods. The images are provided on page 4 of the DAS. Therefore, the dumbwaiter will be situated in secondary areas on both floors that have very limited heritage significance relative to the principal internal spaces and its exterior.

Only a small section of the floor slabs (1320x1320) will be removed between the second and third floors. The minor extent of the demolition is apparent from the Existing Demolition Third Floor Plan, provided below.



Overall, the rooms where the dumbwaiter is proposed are very plain and have no architectural or historic merit. The minimalistic design of the dumbwaiter will blend within the spaces. The proposed installation also takes up a very small area of floorspace and will resemble fitted storage or furniture along the edge of the second and third floors.

The provision of the dumbwaiter would make the functionality and connection between the floor spaces much more efficient. This is detailed on page 3 of the DAS.

It has been demonstrated that the principle of this type of vertical servicing route is already established in the building and the introduction of dumbwaiters between 2<sup>nd</sup> and 3<sup>rd</sup> floor requires minimal loss of fabric and minimal changes to interior aesthetic of relevant spaces.

It is also not a circulation route, but a much smaller and compact servicing route, not dissimilar to existing ducting and other vertical routes, with far less potential to disrupt plan form or the historic circulation pattern of the building. To be clear, there is

no potential for people to use this vertical route, going up a single storey, and it forms part of servicing upgrades for the new tenant.

This proposal will not result in harmful impacts to the understood significance of the building. It will provide public benefit, by ensuring the upgraded commercial floorspace operates with enhanced functionality and efficiency, as is expected by modern requirements. The proposals will contribute to ensuing long term occupancy, which is an overarching conservation benefit.

The proposals would therefore fully comply with paragraph 215 of the NPPF and will accord with Policy D2 'Heritage' of the London Plan (2021), Camden Council's Local Plan (2017) Policy D1 'Design' and D2 'Heritage' and Camden Design SPG (2021), that specifically emphasises that the overarching design messages underline the council's commitment to excellence in design and that schemes should consider the use and function of the building.

To this end, we respectfully ask that listed building consent be granted for these modest interventions to upgrade the functionality of the Camden Town Hall.

Full details of the proposals, including technical and design considerations, are set out in the accompanying DAS, provided by Purcell, existing and proposed floorplans, sections and elevations.

In support of this application, please see the following submitted documents:

- Heritage Statement;
- Design and Access Statement;
- Site Location Plan (Ref: 242931-PUR-01-SL-DR-A-0100);
- Existing Block Plan (Ref: 242931-PUR-01-SL-DR-A-0101);
- Existing Second Floor Plan (Ref: 242931-PUR-01-02-DR-A-9003);
- Existing Third Floor Plan (Ref: 242931-PUR-01-03-DR-A-9004);
- Proposed Second Floor Plan (Ref: 242931-PUR-01-02-DR-A-9203);
- Proposed Third Floor Plan (Ref: 242931-PUR-01-03-DR-A-9204);
- Proposed Dumbwaiter Details (Ref: 242931-PUR-01-XX-DR-A-6411).

We trust that the application meets the Council's validation requirements, but should you require anything further please do not hesitate to contact the undersigned.

Yours sincerely,



Elizaveta Konstantinova

Planning and Heritage Advisor

**Heritage Potential**

London

Enc.