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

29 January 2025

Our Ref: 6410

Dear Sir/Madam,

**Bidborough Works, Camden Town Hall, 5 Judd Street, London WC1H 9JE – Listed Building Consent for “The Installation of New Lighting and Associated Works to Stair Cores C, D, G of Camden Town Hall”**

On behalf of our client, Eventhia Ltd, please find enclosed an LBC application for the provision of a new lighting design to stair cores C / D / G of Bidborough Works within Camden Town Hall demise. The proposed works aim to uplift the lighting and servicing to sensitively enliven and formalise the front of house environment when circulating between the floors.

The proposals are associated with works granted under approval of LBC application reference 2024.1389.L and 2024.0712.P dated 24.07.24.

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 spaces. The stair cores C, D, and G do features of interest, principally the terrazzo stairs, attractive metal balustrades, and terrazzo panelling to dado level which elevate the status of the stair cores in the hierarchy of the building. However, their current appearance is diminished by unattractive light fittings and surface-mounted trunking across the walls and soffits. These features detract from the appreciation of the spaces and undermine the historic character of these circulation routes.

The overall significance of the stair cores C, D, G is lower than the principal rooms of Camden Town Hall. They are noted as higher status circulation routes of moderate significance, due to the materiality and retained features within them.

According to the "Review of St Pancras Town Hall" (1937), the Town Hall originally adopted a progressive approach to its electricity supply and lighting strategy, utilising the latest technology and incorporating designs by the Architect that complemented the overall decoration. At the time of construction this included progressive lighting elements including footlights, spotlights, cornice lighting, and other decorative lighting elements. As such, the innovative servicing of the building, reflective of its time of construction, also contributes to the significance of the listed building and is material to note for this application.

### **New Lighting Design to Stair Cores C, D, G**

The proposed works to the stairs aim to enhance the lighting and services. The proposed strategy does not touch the terrazzo and does not require chasing of services within the existing masonry. Instead, it is proposed to build out the walls with a minimal lining that will allow for concealed cabling to new decorative wall lights with a continuous linear LED wash down the walls to provide the required lux levels for safe use of the stairs.

The lining is fully reversible and impacts only the existing plaster on the walls. It does not affect the appreciation of the existing decorative elements of the stairs that contribute to significance, namely the terrazzo, which minimises and mitigates against potential harm.

The proposals will also incorporate extrusion lighting, chandeliers that are sympathetic to the Art-Deco style, and other bespoke lighting. The specifications for all types of lighting are attached as part of this application. These features are consistent with the innovative design intent of the town hall more generally, as noted above, and are also consistent with the Art Deco design intent of the internal spaces.

Overall, the proposed interventions do not damage existing fabric or decorative features, including the terrazzo stairs, metal balustrades, and terrazzo dado wall panelling. The slight projection of the dado rail and the terrazzo beneath would also be maintained. Therefore, the works will have a neutral impact on the fabric of the stair cores.

The proposed works will also enhance the lighting and services to create a more suitable front-of-house environment when moving between floors, thereby promoting a more comfortable use of the space. This enhancement supports long-term occupancy while ensuring fewer interventions are necessary in the long term, which is an overarching conservation benefit. They will also result in the removal of unsightly, modern surface level trunking to be replaced with a consistent wall surface and lighting strategy, which is also a heritage benefit to weight in favour of the works. As such, the proposals reflect a modest heritage benefit overall.

The application 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.

There is also a precedent within the building for permitting new feature lighting in stair cores A, B and E and other areas. These changes were approved as part of the 2024/0464/L application. The proposed lighting will be consistent in design with the approved ones.

To this end, we respectfully ask that listed building consent be granted for these modest interventions to enhance the visual appeal and 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, and the lighting specifications document.

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 Ground Floor Plan (Ref: 242931-PUR-01-GF-DR-A-9001);
- Existing First Floor Plan (Ref: 242931-PUR-01-01-DR-A-9002);
- Existing First Floor Mezzanine Level Plan (Ref: 242931-PUR-01-MZ-DR-A-9005);
- 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 Ground Floor Plan (Ref: 242931-PUR-01-GF-DR-A-9201);
- Proposed First Floor Plan (Ref: 242931-PUR-01-01-DR-A-9202);
- Proposed First Floor Mezzanine Level Plan (Ref: 242931-PUR-01-MZ-DR-A-9205);
- Proposed Second Floor Plan (Ref: 242931-PUR-01-02-DR-A-9203);
- Proposed Third Floor Plan (Ref: 242931-PUR-01-03-DR-A-9204);
- Stair C Existing (Ref: 242931-PUR-ZZ-XX-DR-A-6405);
- Stair G Existing (Ref: 242931-PUR-ZZ-XX-DR-A-6406);

- Stair D Existing (Ref: 242931-PUR-ZZ-XX-DR-A-6407);
- Stair C Proposed (Ref: 242931-PUR-ZZ-XX-DR-A-6408);
- Stair G Proposed (Ref: 242931-PUR-ZZ-XX-DR-A-6409);
- Stair D Proposed (Ref: 242931-PUR-ZZ-XX-DR-A-6412);
- Stair Core Lighting Specifications Document.

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

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