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

11 February 2025

Our Ref: 6410

Dear Sir/Madam,

The Camden Centre, Camden Town Hall, 5 Judd Street, London WC1H 9JE – Listed Building Consent for: ‘Revisions to Lobby Ventilation through Retrofit of the G.45 Ticket Offices on East and West Internal Elevations’,

On behalf of our client, Eventhia Ltd, please find enclosed an LBC application that seeks a revision to the approved ventilation strategy at Camden Town Hall.

The proposals are necessary to significantly enhance the Camden Centre events venue by improving its functionality in line with its modern use. The Camden Centre can host large numbers of people, proportionate to its scale and use, and could be occupied for extended periods of time during events. The ventilation system is therefore essential to maintain good air quality and atmosphere regulation in both the lobby and gallery spaces, whilst also conditioning the rooms to maintain a comfortable temperature that can assist fabric protection.

The provision of fresh air into both of these spaces is also required to meet Part F of the building regulations. Furthermore, in response to the Covid-19 pandemic, the UK government has issued guidance emphasising the importance of ventilation to reduce the risk of virus transmission.

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

Planning History

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 submitted in 2024:

Managing Director
Helen Cuthbert

Associate Director
Niall Hanrahan

Directors
Stuart Slatter | Dan Templeton

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
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.	Granted	06-02-2025
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.	Granted	06-02-2025
2024/5552/L	Installing new suspended ceilings and ceiling linings to the ground and first floor of Camden Town Hall within the demise of the Camden Centre.	Awaiting Decision	
2024/5774/L	Internal alterations to Camden Centre including installation of platform chair lift.	Awaiting Decision	
2025/0269/L	Installation of 1 no. dumbwaiter between second and third floor.	Granted	05-02-2025
2025/0406/L	Installation of new lighting and associated works to stair cores C / D / G of Town Hall.	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".

National Planning Policy Framework (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 D3 - Optimising site capacity through the design-led approach - Requires development proposals to
- help prevent or mitigate the impacts of noise and poor air quality;
 - achieve indoor and outdoor environments that are comfortable and inviting for people to use;
 - respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character;
 - be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well;
 - aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy.
- 1.20. Policy GG3 – Creating a healthy city – Requires development proposals to ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.
- 1.21. 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)

- 1.22. Camden Council's Local Plan (2017) covers the plan period from 2016-2031 and sets out the Council's vision for the borough.
- 1.23. Camden Local Plan also addresses aspects related to ventilation and indoor air quality, particularly in the context of creating healthy and sustainable environments. This is mentioned in the following policies: CC1 and CC2 – Climate Change Mitigation and Adapting to Climate Change, A1 – Health and Well-being, C2 – Community Facilities, and D1 – Design.
- 1.24. Chapter 7, Policies D1 and D2 relate

1.25. **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

- 1.26. 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)

- 1.27. The Camden Planning Guidance covers a range of topics (such as heritage, housing, sustainability, amenity and planning obligations).
- 1.28. 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
- 1.29. 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.

Camden Air Quality SPG (2021)

1.30. Paragraph 4.12 states *"Indoor air quality needs early consideration in building design. The location of ventilation inlets, flues, opening windows should be on higher floors away from the sources of air pollution at ground level, but also stationary sources of plant. If mechanical ventilation (air conditioning) is considered acceptable (following the cooling*

hierarchy, see Chapter 10 CPG Energy efficiency and adaptation), they should be fitted with proven filtration technology appropriate for the pollutants of concern and should be maintained. Developments should also consider the location of neighbouring receptors.”

Significance of Heritage Assets

The proposals are entirely internal and the only heritage asset that could be affected is considered to be Camden Town Hall (Grade II – list entry number 1379162). The building was listed on 19th 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 original use of the Camden Centre as an assembly hall contributes to the significance of the listed building due to its communal value. The historic development of the Camden Centre reveals a space intended to be distinct in terms of its aesthetic (grand volume, Art deco fittings and features), as well as its use (events including performances, exhibitions, film and cinema, dancing and sport). The maintenance of the historic event function within this part of the building, is therefore of interest to its conservation.

The nature of the building's use makes it essential to accommodate a large number of visitors simultaneously. The entrance lobby serves as the first internal space that visitors encounter, making it a prime location for visitor engagement prior to entering the main hall. It therefore is a high status space within the building, with a large amount of original fabric and historic features that contribute positively, including its ticket booths in the rear lobby.

The retention and improvement of the historic use, alongside an aesthetically conserved entrance hall into the Camden Centre with improved ventilation, is of both heritage and wider public benefit.

These factors specific to the Camden Centre are important to fully appreciate its historic and architectural interest.

The Provision of the Ventilation Inserts to the G.45 Ticket Offices' East and West Elevations

The current proposals will incorporate ventilation panels to the G.45 Ticket Offices' east and west elevations within the ground floor of the main Camden Centre entrance. It also proposes associated risers and M&E equipment to support the proposed ventilation system. Please refer to Purcell's Design and Access (DAS) for further information.

New service risers will be installed within the former ticket offices. Original features within Room G.45 will be retained, while careful repairs to the existing ticket booths, including joinery and glazing panels, will be undertaken.

The proposals are necessary to enhance the events venue by improving its functionality in line with its consented modern use. The ventilation system is essential to maintain good air quality in both the lobby and gallery spaces, whilst also conditioning the rooms to maintain a comfortable temperature, that can also improve fabric protection through heating and cooling.

The existing ticket office booths are effectively defunct and due to their size, had no clearly defined purpose within the consented scheme. Despite the fact the panelling and glazing panels would benefit from repairs, the two booths do still offer a good understanding of the original lobby arrangement into the Camden Centre and they are an interesting original feature that contributes positively to significance.

The proposed design of the timber ventilation louvres within the recessed timber panelling will replicate the existing timber panel located above the respective glazed openings within the ticket booths. It will relate to only a small proportion of visible surface area and will be sympathetic to the aesthetic of the lobby space. Namely, the vast majority of historic fabric within the booths is either retained or repurposed. The new ventilation panels are bespoke designed and replicate existing panels in the booths, as well as precedents that have been inserted and approved elsewhere in the building (again see DAS), contributing to a heritage led and holistically understood proposal.

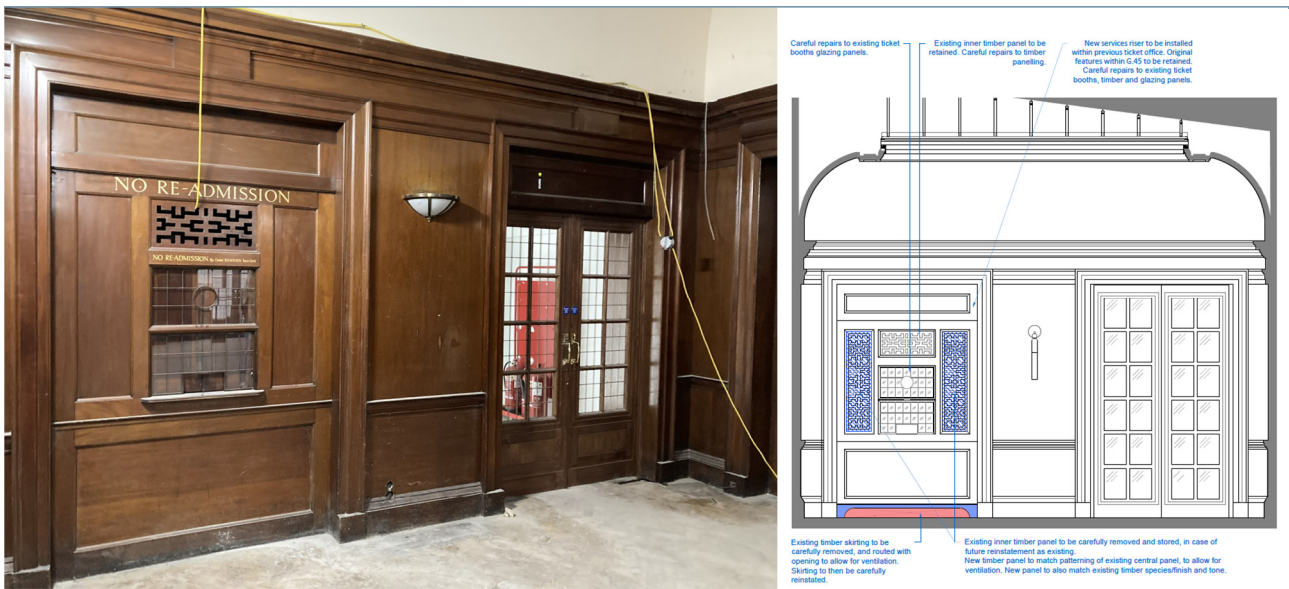
Furthermore, the general arrangement, location and fabric of the ticket booths will remain largely as is, which ensures they will continue to contribute architecturally in the same way as they do now, i.e. their original design and purpose will be clearly legible to the guests using the space. The decision was also taken to split the ventilation requirements between both booths, helping to maintain the spatial symmetry of the rear lobby area.

As set out in the submitted DAS, these proposals have only been required because of on-site investigations which have revealed that the previously agreed ventilation strategy for this part of the building is no longer structurally viable and could create a higher degree of harm than anticipated. Other options have been tested to work to best understand how the ventilation could be integrated most effectively. The studies have revealed that this approach is the least aesthetically harmful and can reflect a progressive and sympathetic use of space that does not otherwise lend itself to long term functional use. The other options that were discounted are described and illustrated in the submitted DAS.

The following steps will be carefully followed to ensure that the sensitive works are undertaken harm to the significance of the heritage asset:

- The 4x small sections of the existing plain timber panelling will be carefully removed and stored for future reinstatement if required.
- The existing timber skirting will be carefully removed and routed with an opening to allow for ventilation. The skirting will then be carefully reinstated in its original position.
- Careful repairs will be made to the timber panelling, including the reinstatement of the small portion that appears to be missing.
- Careful repairs will be made to the glazing panels of the existing ticket booths.

Existing Condition of the Ticket Office (Left); Proposed Design of the Ventilation Louvres (Right)



Source: Purcell

The proposals would therefore fully comply with paragraph 215 of the NPPF and will align with Camden Council’s Local Plan (2017) Policy D1 ‘Design’ and D2 ‘Heritage’, Camden Design SPG (2021) and Camden Air Quality SPG (2021) which considers commitment to excellence in design, air quality and amenity, by creating safe and comfortable spaces within heritage assets.

It is worth reiterating here that the provision fresh air into both of these spaces is also required to meet Part F of the building regulations. Furthermore, in response to pandemic, the UK government has issued guidance emphasising the importance of ventilation to reduce the risk of virus transmission. The provision of the ventilation system proposed, while minimising and mitigating against harm, will therefore represent a good public benefit and conservation benefit (in future proofing the building), that must weigh in favour of the proposals.

To this end, we respectfully ask that listed building consent be granted for these modest interventions to upgrade the events function of the Camden Centre in line with the original permission.

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

Documents

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);
- Demolition Ground Floor Plan (Ref: 242931-PUR-01-GF-DR-A-1001);
- Proposed Ground Floor Plan (Ref: 242931-PUR-01-GF-DR-A-2001);
- Existing Internal Elevation – East (Ref: 242931-PUR-01-ZZ-DR-A-0014);
- Existing Internal Elevation – West (Ref: 242931-PUR-01-ZZ-DR-A-0015);
- Proposed G.45 Entrance Lobby Elevations (Ref: 242931-PUR-01-GF-DR-A-4008);
- Proposed G.45 Ticket Office Elevations (Ref: 242931-PUR-01-GF-DR-A-6023);

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.