

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

12 March 2025

Our Ref: 6410

Dear Sir/Madam,

The Camden Centre, Camden Town Hall, 5 Judd Street, London WC1H 9JE – Listed Building Consent for:
‘The adaptation of the current layout to staff WC 1.40 by replacing one WC cubicle with a shower cubicle’, and
‘Relocation of existing wall mounted electrical boxes that are visible in the event space (G.50) and the installation of a new timber joinery piece to conceal these’ within the demise of the Camden Centre.

On behalf of our client, Eventhia Ltd, please find enclosed a joint LBC application for the adaptation of the current layout to staff WC 1.40 by replacing one WC cubicle with a shower cubicle, and relocation of existing wall mounted electrical boxes that are visible in the event space (G.50) and the installation of a new timber joinery piece to conceal these.

The proposals are associated with works granted under approval of LBC application reference 2024.1389.L + 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:

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	Granted	21-05-2024

Managing Director
Helen Cuthbert

Associate Director
Niall Hanrahan

Directors
Stuart Slatter | Dan Templeton

	adjusted ducting routes, relaying of areas of flooring and general internal refurbishment.		
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	
	Revisions to Lobby Ventilation through Retrofit of the G.45 Ticket Offices' on East and West Internal Elevations.	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 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)

- 1.20. Camden Council's Local Plan (2017) covers the plan period from 2016-2031 and sets out the Council's vision for the borough.
- 1.21. **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

- 1.22. 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)

- 1.23. The Camden Planning Guidance covers a range of topics (such as heritage, housing, sustainability, amenity and planning obligations).
- 1.24. 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.

Significance of Heritage Assets

- 1.25. 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.
- 1.26. 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.
- 1.27. 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.

Assessment of the Proposals

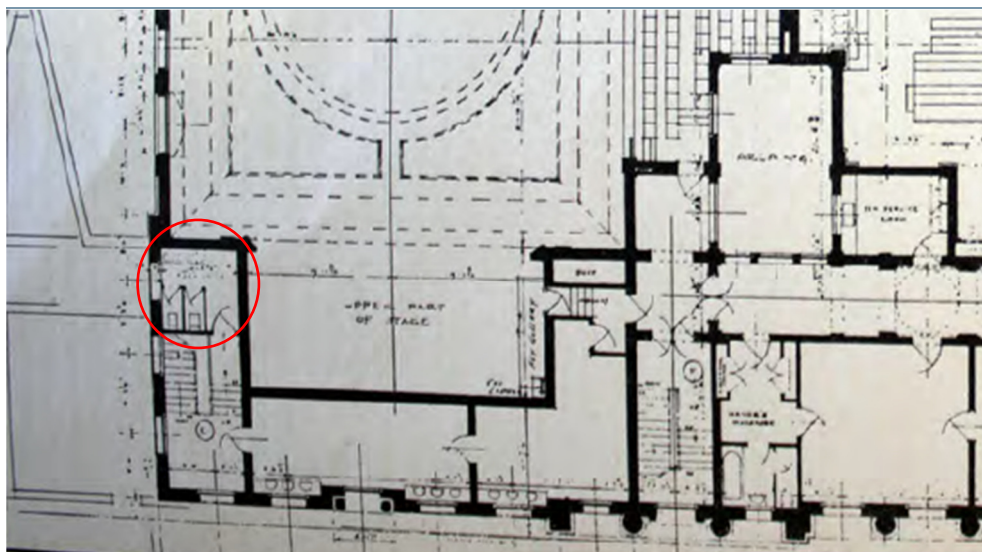
Relocation of existing wall mounted electrical boxes in the event space (G.50) and the installation of a new timber joinery piece

- 1.28. The proposals are necessary to enhance the Camden Centre events venue by improving its functionality in line with its modern use.
- 1.29. The relocation of existing wall mounted electrical boxes in the event space (G.50) and the installation of a new timber joinery are necessary in order to maintain the aesthetic integrity of the primary event space.
- 1.30. The existing visible electrical boxes and black cabling detract from the finished appearance of the area, which is critical for creating an appealing and professional environment for events. The image of the existing condition of the electrical boxes is provided on page 4 of the DAS.
- 1.31. By relocating these elements to the south wall and concealing them with new timber joinery pieces that match the existing wall panelling, it will be ensured that the space remains visually cohesive and in keeping with the historical character of the building and the hierarchy of the space. Additionally, the proposed reversible installation method (details provided in the DAS and drawing 242931-PUR-01-ZZ-DR-A-6022) will protect the building's listed fabric while allowing for future modifications if needed.
- 1.32. Overall, this proposal will enhance the appearance of the event space (G.50). The details of the installation of the boxes, provided in the DAS and drawing 242931-PUR-01-ZZ-DR-A-6022, demonstrate that the proposal will have no detrimental impact on the existing fabric.

The adaptation of the current layout to staff WC 1.40 by replacing one WC cubicle with a shower cubicle

- 1.33. The 1937 plan below indicates that the original configuration of the WC has been maintained to the present day. A site visit has confirmed that the existing terrazzo wall and cubicle partitions hold historical significance.

First Floor Plan, As Built 1937



Source: Purcell

As part of the 2024/0464/L application, approval was granted to rearrange the existing terrazzo cubicle partitions by rotating them 90 degrees, so they run perpendicular to the window.

The current proposals to accommodate a new shower cubicle in place of the existing WC in staff WC 1.40 will not impact the significance of the heritage asset. The existing terrazzo wall, floor, and cubicle finishes will be retained.

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.

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 images, technical and design considerations, are set out in the accompanying DAS, provided by Purcell. Existing and proposed floorplans, sections and elevations are submitted as part of this application.

Documents

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

- Heritage Statement
- Design and Access Statement (Ref: 242931-PUR-00-XX-RP-A-0007);
- 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);
- Proposed Ground Floor Plan (Ref: 242931-PUR-01-GF-DR-A-9201);

- Existing First Floor Plan (Ref: 242931-PUR-01-01-DR-A-9002);
- Proposed First Floor Plan (Ref: 242931-PUR-01-01-DR-A-9202);
- Camden Centre BOH WC Elevations (Ref: 242931-PUR-01-01-DR-A-4038);
- Camden Centre Events Space Timber Joinery Detail (Ref: 242931-PUR-01-ZZ-DR-A-6022);

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.