

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

14 May 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 'Internal alterations to Camden Centre including installation of platform chair lift'.

On behalf of our client, Eventhia Ltd, please find enclosed an LBC application for the Installation of five power sockets and data points to the Entrance Lobby G.45 and the installation of a wheelchair lift from Stair F to Lobby G.49, within the demise of the Camden Centre in Camden Town Hall.

The proposals are necessary to enhance the events venue by improving its functionality in line with its modern use, as well as improve accessibility. The proposals are associated with works granted under approval of Listed Building Consent (LBC) application reference 2024/0464/L dated 21.05.24.

The £76m refurbishment of Camden Town Hall took place in May 2023 following the approval of application reference 2019/2257/L. 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 for Il Bottaccio, the future leaseholder of the Camden Centre, and enabling to re-occupy the floorspace for the long term.

The following applications were approved in 2024 and form the relevant background to this proposal:

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
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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
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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 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 original and evolving design of the space also sought to install the best technology in order to facilitate its flexible but often demanding mixture of uses.

The maintenance of the historic event function within this part of the building, is therefore of interest to its conservation. The retention and improvement of this use for the future, alongside an aesthetically enhanced hall with improved accessibility would be of both heritage and wider public benefit. These factors specific to the Camden Centre are important to fully appreciate its historic and architectural interest, as distinct from the wider Town Hall.

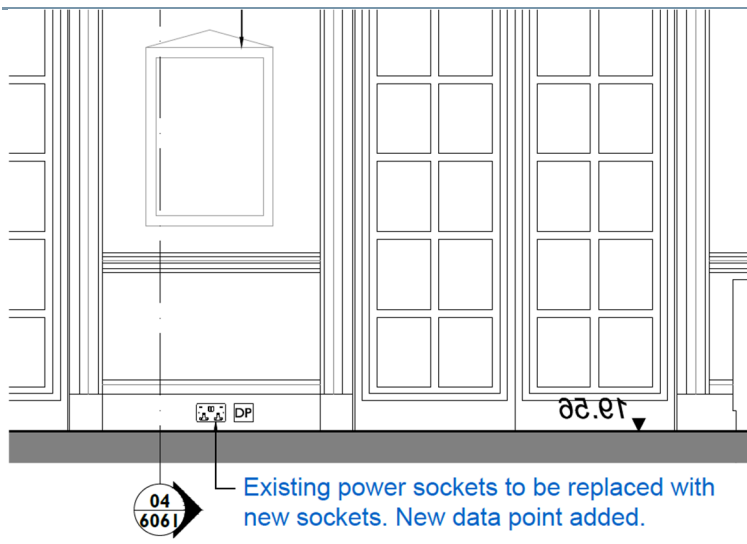
The current proposals will incorporate:

- Installation of five power sockets and data points to the Entrance Lobby G.45;
- Provision of wheelchair lift from Stair F to Lobby G. 49;

New Power Sockets and Data Points to Lobby G.45

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. As typical for a state-of-the-art events space of the inter-war period, the entrance foyer has always facilitated space for advertisements, promotional information and wayfinding, as evidenced through the existing timber poster boxes within lobby G.45. New power and data points are required to support its ongoing function including for the flexible use of freestanding screens for presenting information to guests. The existing provision of power and data points in this area is insufficient and outdated, requiring a modest and proportionate uplift.

Proposed Power Sockets to Entrance Lobby G.45



Source: Purcell

It is vital to acknowledge that this element of the proposals has been developed through careful assessment and negotiation of various options to enhance modern wayfinding, advertisement, and customer experience, all while avoiding any detrimental impact on the building's fabric. The proposed alterations are every modest and reflect typical M&E provisions, as seen in other parts of the building and indeed, already within the foyer itself. This element of the proposals will have a neutral impact on the appreciation of the historic entrance foyer, by providing minor contemporary additions in discrete locations to complement its

function. The proposals will align with Camden Council's Local Plan (2017) Policy D1 'Design' and D2 'Heritage' and Camden Design SPG (2021) which considers commitment to excellence in design, among other, by creating well connected public spaces and good quality public realm.

Provision of wheelchair platform lift from Stair F to Lobby G.49

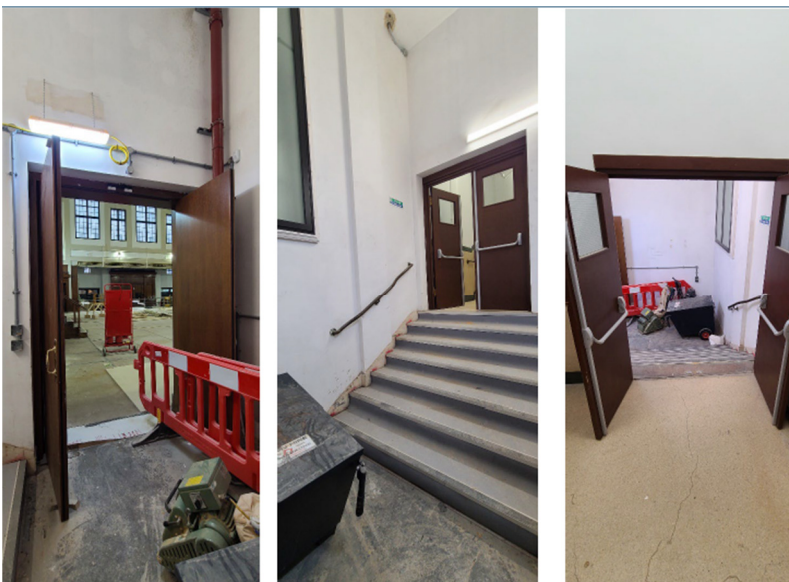
The wheelchair lift will be installed in the Stair F Hallway leading to Lobby G.49, an area that has recently undergone refurbishment and has been finished in a simplistic manner. The stair, handrails, and wall plaster in this space are all modern, and there are no significant decorative heritage features present. It has always served a secondary and ancillary function for discrete access to the stage and is not prominent from within the primary spaces.

As a result, the installation of the wheelchair lift will not require removal or interference with any significant historic fabric. The platform lift specified is compact in design, requires no additional space on the upper landing, is quiet and folds flat against the wall in a discrete manner when not in use. The new accessible wheelchair platform lift will provide public benefits by ensuring permanent wheelchair access from the event space to the stage level, greatly enhancing accessibility for performers, visitors and staff alike.

Alternative options for the lift have been thoroughly reviewed during the design development process, with details on these alternatives provided in the Design and Access Statement.

This element of the proposals is not considered harmful to the Town Hall's significance and reflects a necessary modern upgrade for improved accessibility. The objectives of this proposal align with Policy D5 'Inclusive Design' of the London Plan (2021), which requires development proposals to achieve the highest standards of accessible and inclusive design by being convenient and welcoming with no disabling barriers.

Existing Stair F to Lobby G.49 Condition



Source: Purcell

Summary

The internal works are all specified within the demise of the Camden Centre in Camden Town Hall (Grade II). The proposals are associated with works granted under approval of LBC application reference 2024/0464/L dated 21.05.24. The works are required to enhance the events venue by improving its functionality in line with its modern use, as well as improve accessibility.

The introduction of new power sockets and data cables points to Lobby G.45 will have a neutral impact on the significance of the heritage asset. The provision of wheelchair lift from Stair F to Lobby G. 49 will introduce a significant public benefit by ensuring permanent wheelchair access from the event space to the stage level, greatly enhancing accessibility for performers, visitors and staff alike.

The proposals would therefore fully comply with paragraph 215 of the NPPF and will accord with Policy D2 'Heritage' and Policy D5 'Inclusive Design' of the London Plan (2021), Camden Local Plan (2017), and Section 3 of Camden Design SPG (2021) that mentions that 'historic buildings can and should address sustainability and accessibility'. 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.

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. Further internal images are also provided on pages 5-10 of the DAS Cover Letter.

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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