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London Borough of Camden
Development Management Team
5 Pancras Square
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16 December 2019

Dear David,

Camden Town Hall | Application for Listed Building Consent for the full replacement of the existing roofing slates

Introduction

Enclosed is an application for listed building consent, made on behalf of Lendlease, acting as Project Managers on behalf of the London Borough of Camden (LBC), for the full replacement of the existing roofing slates at the Grade II listed Town Hall, Judd Street, London, WC1H 9JE.

Application content

This application for listed building consent has been submitted via the Planning Portal (ref: PP-08347026). The following make up the application and supporting documents:

- Application form
- Location Plan at scale 1:1250 (ref. CTH-PUR-MP-ZZ-DR-A-90010 Rev. S5 P01)
- Existing Site Plan (ref. CTH-PUR-MP-ZZ-DR-A-9011 Rev. S5 P01)
- Proposed Roof Plan (ref. CTH-PUR-MB-RF-DR-A-98101 Rev. P01)
- Design Document, dated December 2019, prepared by Purcell (*includes a Heritage Impact Assessment at Section 4*)

We would be grateful if the contents of this letter could also be taken into consideration. Applications for listed building consent are exempt from payment.

Site

Camden Town Hall (CTH), formerly St Pancras Town Hall, was built between 1934-37 to designs by A.J. Thomas. It is a Grade II listed building, bounded by Judd Street, Euston Road, Tonbridge Walk and Bidborough Street. It is located within the King's Cross Conservation Area, and on the boundary of the Bloomsbury Conservation Area. It has been the primary public building and focus of the civic and democratic functions of the London Borough of Camden. The former Assembly Room, previously known as the Camden Centre, lies at the east end of the building with its foyer currently accessed from Bidborough Street.

The site is bounded to the north by Euston Road, a major road with fast flowing traffic, bus and cycle routes. Directly to the north of the site is St Pancras Station and Chambers and the St Pancras Renaissance Hotel. Adjacent to this, on either side, are the Grade I listed British Library and King's Cross Station.

To the west of the site, on Judd Street, are office buildings and student accommodation. The offices of the Royal National Institute for the Blind are located to the south west of the site. Directly south of the site, the character is more residential with the Queen Alexandra Manson Block, a 5-7 storey residential block, located behind the town hall. The streets beyond are formed of terraced houses and mansion blocks and form the northern fringes of Bloomsbury. At the end of Bidborough Street is the Argyle Primary School. At the corner of Bidborough Street and Tonbridge Street, at the south east corner of the site, is the Victorian-era Dolphin Pub.

On the western side of Judd Street, opposite the site is another Victorian pub, the Euston Road Tavern. Directly to the east of the site, on Tonbridge Walk, is the former Town Hall Annex; this was sold by the Council and has been converted into a hotel by a private developer. There was until recently a bridge linking the Annex to the Town Hall at second floor level. This was removed as part of the Annex conversion and the developer is responsible for making good the exposed Town Hall elevation.

Background

Applications for full planning and listed building consent application (ref: 2019/2238/P +2019/2257/L) for refurbishment of the Town Hall were submitted in April 2019 and approved at Committee in August 2019, subject to the Section 106 agreement. The proposals will deliver essential building work to upgrade the whole building, whilst protecting its historic significance. The project will create a partnership with new commercial organisations, which will enhance the local economy and provide employment opportunities, while generating a long-term income stream to support the initial investment made by LBC.

In association with these forthcoming works, replacement roofing slates are now proposed. Initially, the approach involved localised repair and replacement of some roofing slates. However, upon further inspection and following a specialist survey, it has been established that the current slates are coming towards the end of their lifespan. Many of the slates are in poor condition, with slipped slates, excessive pollution and visible water retention around poor waterproofing details. In addition, it has been determined that, in order to carry out essential works only, all slates would need to be removed anyway to ensure that no further damage is done to existing slates. To achieve a more cohesive approach, it is now proposed to fully replace all of the roofing slates. This will ensure visual continuity in relation to the roof. It will also create an opportunity to futureproof and extend the lifespan of the Town Hall.

As you are aware, the project team had a pre-application meeting with planning officers on 2 December 2019 to discuss the proposals. Officers were supportive of the principle of the full replacement and were shown samples of the proposed roofing slate, which were deemed to be acceptable in principle.

Proposal

It is proposed to remove all existing roof slates. Waterproofing works to the substrate are proposed. New Westmorland Green slates will be reinstated on a like-for-like basis – this will be undertaken by a specialist roofing subcontractor, with support from the conservation architect. All lead flashings and waterproofing functions will be undertaken by a LSTA accredited leadworker. It is anticipated that the new roofing slates will be guaranteed for the next 75 years.

As the tiles are being replaced on a like-for-like basis, there will be little change in terms of the visual appearance of the roof. However, the current tiles have been partially discoloured due to general weathering, pollution and ageing, therefore the new slates may have a slightly different appearance and colouring initially. However, over time they will naturally weather. In addition, the new slates will create a harmonious language with St Pancras Renaissance Hotel directly opposite, which has recently been the subject of a full replacement of Westmorland Green slates.

Planning Policy Context

The key primary legislation relevant to the planning process is as set out in the Planning (Listed Building and Conservation Areas) Act 1990 (the Listed Building Act). S.16 and s.66 of the Listed Building Act impose a statutory duty on planning authorities consider the impact of proposals upon listed buildings and their settings.

The policies within The National Planning Policy Framework 2019 (NPPF) including the Planning Practice Guidance 2014 (PPG); and the Development Plan form a material consideration in the determination of this application. The Development Plan is formed of GLA's London Plan 2017 (which is under review), and the Camden Local Plan comprised of: The Camden Local Plan July 2017; the Site Allocations Plan September 2013 and the policies map (updated version) January 2019.

Other relevant guidance is within LBC Kings Cross/St Pancras Conservation Area Statement (December 2003), LBC Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011). The following policies have been considered in devising this proposal: NPPF Section 12 'Well-designed Places' and new Section 16 'Conserving and Enhancing the Historic Environment'; London Plan policy 7.8 Heritage assets and archaeology, 7.9 Heritage-led regeneration; LBC strategic policy D1 Design, D2 Heritage.

Assessment of work

The primary planning policy consideration for the proposed works is the design impact of the works on heritage significance, namely the special architectural and historic character of the Grade II listed building. The key policy consideration are as follows:

- Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced. It requires heritage assets to be conserved in a manner appropriate to their significance.
- London Plan Policy 7.8 states that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

- London Plan Policy 7.9 states that, wherever possible, heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.
- Policy D1 of Camden's Local Plan requires that development preserves or enhances the historic environment and heritage assets in accordance with Policy D2.
- Policy D2 states that the Council will 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.

The existing roof slates have been permanently discoloured and have come to the end of their lifespan. Therefore, like-for-like roofing slates are proposed, which will futureproof the building in a sensitive and appropriate manner. The proposed roof slates are of the highest quality and will have visual improvements for the Town Hall. The new slates will create a harmonious language with St Pancras Renaissance Hotel directly opposite, which has recently been the subject of a full replacement of Westmorland Green slates. The new slates will also show how the Town Hall would have looked originally when first built, which is fitting of such an extensive refurbishment project. A specialist roofing subcontractor will be instructed to undertake the works to ensure that works are undertaken sensitively.

Overall, the proposals will result in sensitive improvements to the heritage asset and will guarantee the integrity of the roof for the next 75 years. The proposals are like-for-like, therefore no harm to the heritage asset will arise – rather, the new tiles will preserve and enhance the heritage asset into the future, in accordance with Section 16 of the NPPF. There will be no adverse impact on the special architectural and historic character of the Grade II listed building nor the surrounding Conservation Area – rather, the proposals will further integrate the building into the surroundings, in particular St Pancras Renaissance Hotel. The works fully meet the objectives of the NPPF (section 16), London Plan policies 7.8 and 7.9, as well as Camden Local Plan policies D1 and D2.

Summary

CTH is an important building in Camden and the proposed works will ensure that appropriate repair works are undertaken to the roof to futureproof it, whilst preserving its heritage and ensuring the long-term longevity of the building.

The proposals are not considered to cause harm in accordance with NPPF terminology and are fully justified in the context of the works. They will fully respect the special architectural or historic interest of the listed building. Overall, the proposals will support the LBC's function and mission and will continue to enhance the building's important status and significance.

If you have any questions, please contact victoria@theplanninglab.com or melanie@theplanninglab.com (0207 257 9363),

Yours sincerely,

Vicky Cartwright | Director
The Planning Lab