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Development Management Team
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Dear David,

Camden Town Hall | Application for Listed Building Consent for accessibility improvements and future proofing of the Council Chamber and grand staircase

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) in support of works for accessibility improvements and future proofing of the Council Chamber and works to the grand staircase treads at the Grade II listed Town Hall, Judd Street, London, WC1H 9JE. The proposed description of development for the application is:

“Accessibility improvements in the Council Chamber, including a new ramped access, improved operation of moveable seating sections, incorporation of Wi-Fi into updated voting modules in existing benches, new inset nosings to the Grand Staircase, and associated works.”

Application content

This application for listed building consent has been submitted via the Planning Portal (ref: PP-08347095). 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)
- Existing First Floor Plan showing alterations (ref. CTH-PUR-MB-01-DR-A-98000 Rev. P01)
- Proposed First Floor Plan (ref. CTH-PUR-MB-01-DR-A-98010 Rev. P01)
- Council Chamber Dais – Proposed Joinery Detail (ref. CTH-PUR-MB-01-DR-A-98020 Rev. P01)
- Council Chamber Bench – Proposed Joinery Detail (ref. CTH-PUR-MB-01-DR-A-98021 Rev. P00)
- Grand Lobby Staircase – Existing and Proposed Plan (ref. CTH-PUR-MB-01-DR-A-98030 Rev. P01)
- Grand Lobby Staircase – Proposed Nosing Detail (ref. CTH-PUR-MB-G0-DR-A-98031 Rev. P00)
- 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 covering 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 has been 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.

The Council Chamber, which is located on the first floor of the building, is accessed via the principal Judd Street entrance to the east of the site. Opposite this entrance is the Grand Staircase, an imperial staircase starting with one flight and then splitting into two identical returns at half landing level. At the top of this staircase, at first floor, there is an encircling corridor which loops back to the Council Chamber in the centre of the plan. The Council Chamber is the primary space within the building and the focus of the civic and democratic functions of the Council. It is therefore the largest space and one of the most highly decorated, with purpose-built furniture and seating. The double-height room has a central barrel-vault with Diocletian windows at each end. The purpose-built, timber-panelled and leather upholstered furniture is arranged in an arc orientated towards the raised rostrum at the east end. The importance of the Chamber is reflected in its hierarchy of space and symmetry.

Assessment of significance | A Heritage Impact Assessment is included at Section 4 of the accompanying Design Document by Purcell. However, in summary, the Council Chamber and Grand Staircase are deemed to be of very high significance. They form key components which contribute to the significance of the Grade II listed building, including the formal civic functions of the building expressed in the ceremonial route from the Judd Street entrance up to the Council Chamber as well as the spatial qualities and character of the Council Chamber itself. Both the Chamber and staircase are considered to have aesthetic value given their decorative features. In addition, the illustrative and functional value of the plan form of the building, specifically the symmetrical nature of the plan expressed in the volume of the Chamber as well as the Grand Staircase, contribute to the building's significance.

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. 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 support of these forthcoming works, some further works are proposed to the Council Chamber and grand staircase to improve accessibility and to ensure futureproofing. The Council Chamber is at the heart of Camden Town Hall. It stands as a symbol of democracy and inclusivity with galleries for the public to oversee the decisions made by their Council representatives. In its current format and condition, the Chamber creates great difficulties for those with physical impairments. In addition, the general condition of the Chamber is in a poor state of repair caused by general wear and tear. This has been amplified by the introduction of adaptations that have aimed to improve accessibility. Along with improvements to the mechanical and electrical servicing, the joinery benches, desks and Dais have been highlighted for repair works in a recent condition survey. The Dais in particular has been subjected to previous adaptations which has been largely disruptive to the heritage character and symmetry of the Chamber. Other opportunities for futureproofing and improving accessibility have been identified. These aspects have formed the basis for the proposed works.

As you are aware, the project team had a pre-application meeting with planning officers on 2 December to discuss the proposals. We understand that Officers are keen to view the Council Chamber again – we are happy to arrange this at your earliest convenience during the determination period.

Proposal

All works are internal, within the Council Chamber and the grand staircase. No external works are proposed. The proposals can be summarised as follows:

Accessible seating improvements | Currently, there are two hinged bench locations in the Chamber which can be used by wheelchair users. However, these require prior knowledge of wheelchair users attending meetings to ensure that these areas can be prepared in

advance. The repeated mounting and demounting of these accessible locations over the years has caused significant damage to the joinery and has not proven to be an efficient way of adapting the Chamber for wheelchair use.

The proposed works retain these locations but improve the integration and flexibility of the adaptable joinery in the following ways:

- Firstly, two accessible folding tables with pivoting post leg are proposed to be hinged to the existing benches, each directly in front of the Dais. These will be finished to match existing joinery in the Chamber and topped with leather to match existing.
- Secondly, two moveable benches are proposed slightly further back from the Dais. There are two benches in these locations currently. The proposed bench will be placed on castors with the ability to be deadbolted into new position to allow for wheelchair access behind the bench.

Dais improvements | The Dais currently comprises a stepped arrangement which is unsymmetrical and distracts from the strong symmetry of the Chamber. The proposed works seek to reinforce the symmetry of the joinery while improving access to all, with a focus on wheelchair accessibility. Joinery works to the Dais are proposed to reduce the width of the desk but removing a single section of panelling to either side. This enables greater room for movement, which will allow for a wheelchair user to access the raised platform. In addition, it is proposed to remove a further raised central section to the Dais and make good the floor, which will allow a wheelchair user to have full use of the Dais and desk. Equal steps will be installed on either side to strengthen the symmetry while introducing more appropriate step nosings in keeping with the character of the Chamber and providing space for the installation of a temporary ramps to allow for wheelchair users to access the Dais. Finally, the Dais writing desk top will be removed and replaced with a new leather surface.

Connectivity improvements | There are currently integrated delegate voting stations. In association with the already approved electrical reservicing of the Town Hall, it is proposed to make local alterations to the existing benches to enable new microphones and a new voting system to be integrated into them. This will bring the Council Chamber up to modern standards and help to futureproof the building. It is proposed to remove a section of joinery to the top of the desks and remove the existing microphone and voting systems. The new microphone systems will be surface mounted to each bench, running the new cable routes (which will allow for the integration of USB charging ports) behind a new panel to the underside of the desktop, and reinstating a new panel to match the existing. The new systems will enable the user to pick up the microphone and hold it by hand, if required. This benefits less-abled users who may not be able to lean forward to use the current static microphones. The inset voting station and USB charging plates will be finished in antique brass to retain the character of the Chamber. In addition, the existing leather writing desktop will be removed and reinstated with a new like-for-like finish.

Grand Staircase | The bottom three treads of the Grand Staircase currently incorporate small, diamond-shaped, adhesive stickers on them. These were added some time ago to facilitate visibility, but they have worn off over time leaving an inconsistent appearance that detracts from the grandeur of the staircase. It is proposed to provide a more permanent solution with brass nosing detail on each step of the Grand Staircase – this will improve the visibility and general safety of the steps while respecting the significance of the staircase. The existing stickers on the bottom three steps will be removed. Slots will be marked and cut out at the front of each step. The open grooves will be inlaid with 3 no. anti-slip solid brass strips per nosing – each strip will be 5mm in width, 11mm deep and will extend along the length of each step, retaining a narrow margin on either side, between the step and handrail. The new inset nosings will be raised enough to provide grip and ensure they are perceptible whilst not creating a trip hazard. Overall, the proposed treatment will help ensure compliance with DDA, Building Regulations and the Equality Act requirements.

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, C6 Access for all; Camden Planning Guidance – Access for all.

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.
- The NPPF notes at paragraph 91 that planning policies and decisions should aim to achieve healthy and inclusive places which are safe and accessible. Further, paragraph 108 requires planning applications to ensure safe and suitable access to the site for all users.
- 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 alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building.
- Policy C6 of Camden's Local Plan requires the Council to make Camden an accessible place. It states that the Council will require the highest standards of accessibility in buildings and spaces.
- Camden's 'Access for all' Planning Guidance states that the Council expects all development to be inclusively designed and useable by all to promote equality of opportunity. Furthermore, the Council will balance the requirements to provide access with the conservation of heritage assets. Section 6.1 specifically states that sensitive design solutions in listed buildings that achieve access for all should be sought.

Council Chamber | The proposed works to the Council Chamber are required to enhance accessibility for wheelchair users, to make connectivity improvements to modernise the A/V facilities and to secure the future use of the building. The proposed works will greatly improve the accessibility and adaptability of the space, reinstating the original symmetry of the room and readjusting the access to the Dais while formalising the means of adapting the seating to allow for wheelchair users. This is in accordance with Camden's policies D1, D2 and C6, as well as the 'Access for all' Planning Guidance.

The proposed works to the Dais and desk requires the removal of existing joinery. However, the works are required to improve accessibility and to ensure the Dais can be accessed by the wheelchair user. In addition, the proposals seek to retain symmetry, where possible, including the removal of a panel on either side of the Dais. The accompanying Heritage Impact Assessment identifies that this will ensure that the completed works read as a comprehensive solution and not an adapted element. The works will also remedy poor alterations to the historic joinery and result in a more cohesive scheme, preserving and enhancing the heritage asset, in support of national planning policy as well as Camden's policies D1 and D2.

The proposed works will be sensitively undertaken by a specialist contractor and with materials that will result in a comprehensive material palette that will unify all elements of the Council Chamber in a single aesthetic. Any proposed materials are based on the existing and complement the heritage character of the Chamber.

Grand Staircase | The proposed brass nosing detail to the stair treads are invasive and non-reversible. However, they are a required intervention to improve slip resistance, public safety and accessibility, and to make the steps more perceptible to those who are partially sighted. The proposed works are also an improvement on the current stick-on diamonds, which detract from the steps and are a temporary solution that has worn badly over time.

The accompanying Heritage Impact Assessment recognises that the proposed strips are a formal and solid introduction that complements the character of the marble and emphasises the power and status of the staircase being the primary democratic access. The proposed brass finish is harmonious with surrounding fixtures and will integrate with the character of the space.

Overall, the proposed works are in keeping with the approach to the rest of the works in improving accessibility and securing the longevity of the Town Hall into the future. Any minor harm which would arise as a result of the adaptations is far outweighed by the significant improvement in accessibility, inclusiveness and connectivity. The proposals will ensure that the building is fully accessible to all members of the public whilst protecting the grandeur of the Council Chamber and Grand Staircase into the future. This is in accordance with paragraph 196 of the NPPF, which states that where a development proposal leads to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

The proposed works are minor in nature. Any minor harm is outweighed by the benefits of the proposed works, including public benefits. The proposed works are entirely internal and no external works are proposed. Therefore, there are no changes to the external appearance of the building. The works thereby meet the objectives of the NPPF (section 16), specifically paragraph 196, as well as Camden Local Plan policies D1, D2 and C6, and Camden's 'Access for all' Planning Guidance.

Summary

Overall, the proposals seek to improve accessibility and futureproof the Council Chamber, whilst respecting the listed fabric and minimising physical interventions. The proposals within the Council Chamber are sensitive to the existing design and character of the building and will have minimal visual impact. The proposals to the Grand Staircase will improve grip and highlight the step edges to ensure they are more perceptible – this will ensure the on-going safety of users of the building,

The proposals are considered to cause less than substantial harm in accordance with NPPF terminology and are fully justified in the context of the works. They fully respect the special architectural or historic interest of the listed building. Overall, the proposals will support the LBC's function and mission and thus continue enhancing 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**