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6<sup>th</sup> May 2020

Dear David,

**Application for a Non-Material Amendment to Planning Consent ref: 2019/2238/P and associated Listed Building Consent for these amendments | Camden Town Hall, Judd Street, London, WC1H 9JE**

**Introduction**

Enclosed is a non-material amendment (NMA) application pursuant to Section 96A (s96A) of the Town and Country Planning Act 1990, together with an associated listed building consent, made in relation to the Camden Town Hall development on behalf of Lendlease, acting as Project Managers on behalf of the London Borough of Camden (LBC).

Full planning permission and listed building consent (ref. 2019/2238/P and 2019/2257/L) for this development was granted by LBC, with shadow s106 agreement, on 20 December 2019. This scheme permitted the part change of use of the Grade II listed Camden Town Hall from Sui Generis at (part) basement, second and third floors to office use (B1), and the change of use of the Camden Centre from Sui Generis (Town Hall) to events use (comprising D2), as well as external physical works.

This NMA application seeks non-material minor amendments to the scheme which have evolved since the grant of consent, namely changes to the Judd Street entrance to include installation of a new slimline draft lobby to improve thermal conditions within the lobby; like-for-like rebuilding of the main entrance steps; rebuilding of 1940s roof extension to improve structural stability including insertion of structural steels through the North West and South West lightwells; revised layout of rooftop plant to accommodate larger air source heat pumps and retention of existing lift over run and re-purpose as pump room. This application is submitted following pre-application discussions with LBC planning and design officers.

The proposed description of development for the listed building consent application is:

*“Listed building consent (in association with LBC ref. 2019/2257/L) for minor amendments to the Camden Town Hall Judd Street entrance to include installation of a new slimline draft lobby to improve thermal conditions within the lobby, like-for-like rebuilding of the main entrance steps. Internal reconfiguration of the Bidborough Street internal layout to accommodate ground floor level bin store and revised office entrance lobby. Rebuilding of 1940s roof extension to improve structural stability including insertion of structural steels through the North West and South West lightwells. Revised layout of rooftop plant to accommodate larger air source heat pumps and retention of existing lift over run and re-purpose as pump room.”*

**Application content**

This application for an NMA and listed building consent has been submitted via the Planning Portal (ref: PP-08669178 and PP-08668510). The following make up the application and supporting documents:

- Application form
- Location Plan at scale 1:1250
- Existing Plans
- Approved Plans
- Proposed Plans
- Drawing list
- Design and Access document prepared by Purcell (*includes a Heritage Impact Assessment, revised roof top views and structural engineering justification for works*)

- Updated Noise Impact Assessment note by Arup

## 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.

**Assessment of significance** | CTH was designed and built as a Town Hall by St Pancras Borough Council between 1935 and 1937. The design is a result of an architectural competition won by Albert J Thomas, who worked closely with Lutyens. The original building included the Assembly Hall (now known as the Camden Centre). CTH was listed Grade II in 1996, it is located in the King's Cross Conservation Area. The building's significance is derived from its use as a Town Hall as well as its physical fabric. Further details on the significance of the CTH can be found in the Heritage Statement that was approved as part of the original permission.

## 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 shadow s106 was agreed on 20 December 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.

Since the grant of consent, further investigations have taken place which have resulted in the need for some non-material, minor amendments. These amendments will further enhance the functionality of the refurbished and repurposed Town Hall, resulting in significant conservation, economic and social benefits to the borough and surrounding areas.

As you will be aware, the project team had a pre-application meeting with planning officers on 2 December 2019 to discuss the proposals. Officers have confirmed in correspondence dated 28 January 2020 that, given the nature and scope of the proposed amendments, and the fact that the changes are "no worse than the current situation", an NMA pursued through a s96A application is an appropriate application format in this case. In principle support for the changes was also expressed. An associated Listed Building Consent application is enclosed.

## Proposal

All design changes are as described in detail in the Design and Access Statement Addendum but are summarised as follows:

**Judd Street entrance alterations** | In the approved scheme, it was proposed to remove the existing non-original glass draught lobby, returning the portico to its original layout. It was intended that heat loss and thermal comfort would be managed by the installation of heat curtains located internally above each entrance door. The existing stepped and ramped arrangement to the porticoed entrance was

proposed to be retained, with the existing door to the top landing of the ramped entrance proposed to be removed to assist with wheelchair access.

Following review, the client has requested a more preventative measure of reducing heat loss into the entrance lobby and reception. As this is the primary entrance to the Civic and Democratic spaces, the lobby will be subject to a high level of pedestrian traffic. There is also a requirement for doors to be propped open along the processional to the wedding suits on a frequent basis. As such, thermal fluctuation will be a potential issue and there is a risk of this affecting the comfort levels throughout the ground floor of the Town Hall. Therefore, an amendment to the approved scheme is proposed to reintroduce a draught lobby within the existing entrance portico but with a much more sensitive slim line design than existing.

The replacement draught lobby will span the full width of the portico, thereby drawing attention to the symmetry of this feature within the elevation. It will have a dark-coloured, slender aluminium frame and will be predominantly glazed, better showcasing the historic features and materiality of the entrance. The dark colouration will also complement the metal handrails and window frames that have been approved as part of the recent application.

Regarding the door at the top landing of the ramped entrance, the amended scheme reinstates a new door within the existing opening to maintain a security line and protect the historic image of the principal entrance façade. From a wheelchair accessibility perspective, the ramp will continue to provide wheelchair access with a push to open button at the top of the ramp.

Finally, a recent condition survey of the existing historic fabric established that the existing stone entrance steps are in a poor condition and should be rebuilt. Repair of the existing steps has been considered, however it was determined that patch repairs may merely draw attention to their poor condition and would result in visual inconsistency. Details from the conditions survey can be found in the DAS. The amendment application therefore seeks the like-for-like replacement of the entrance steps with a new natural Yorkstone. An anti-slip inset nosing is also proposed to match materials used in the redevelopment project. This will improve the visual distinction of the steps for accessibility, health and safety as well as durability.

**Relocation of bin store** | In the approved scheme, the bin store was located at basement level. However, following a further review with the client and project team, it is proposed to move the bin store to ground floor level. This will be accessed via the bike and refuse lobby on Bidborough Street. The proposed amendment will reduce the size of the office / SME lobby by approximately 25 sqm, and it will also reduce the extent of the glazed screen to the SME spaces at basement level. Subsequent spatial amendments are proposed at basement level as a result of the relocation of the bin store from this area, including the introduction of a Prayer Room and a Facilities + Maintenance Store.

This amendment ensures that the bin store is at street level and it complies with the 10-metre maximum pull distance for bins, as requested by Camden's waste contractor. All other elements of the Operational Waste Management Strategy that was submitted as part of the original application remain as approved. The amendment has no external impact.

**1940s extension – flat roof structure** | In the approved scheme, an area of pitched roof to the 1940s T-shape extension was proposed to be removed and replaced with a flat lightweight slab roof which would accommodate new mechanical plant. The new roof slab was proposed to be supported by existing steel columns which were assumed to run from basement to third floor roof level. However, a detailed survey revealed that the steel columns actually terminate at second floor level and so the existing pitched roof is only supported on non-structurally sound brick piers. The survey therefore established that the existing steel columns would require significant strengthening works with additional steel elements, which would involve full height breaking of the existing historic fabric to expose the columns at each level internally – this involves all 10 columns located under the 1940s roof, including at ground and first floor level, where the existing fabric is of the highest heritage significance. This solution was considered detrimental to the significance of the listed building.

Therefore, to minimise the impact of the structural requirements on significant fabric, the solution is to install a new independent structural frame by introducing two new columns on each of the adjacent lightwells that will support the new flat roof slab. These columns will be restrained laterally at every floor level and four new pad foundations will be formed at the basement level to support the load of the new structural frame as well as the new mechanical plant. The proposed amendment therefore provides a less intrusive and more sensitive alternative solution that removes the need to strengthen the existing structural frame which would require physical interventions to the historic fabric.

**Rooftop plant** | The approved scheme comprised 6 no. Air Source Heat Pumps (ASHPs) on the new flat roof to the 1940s extension. A new plant enclosure was proposed to replace the existing lift motor room at the western end of the roof.

Following design development, the ASHP and attenuator arrangement has been resized to meet the requirements of the building loads and acoustics. A new background noise survey was carried out to update the previous survey and to reflect the position of the plant at the westerly end of the building (the previous survey was carried out at the east end of the building). The findings of the revised noise

survey are found in the ARUP note that accompanies this application. Attenuators are required to be mounted to the top and sides of the units to limit and noise outputs to ensure they are compliant with the Camden Guidance. In addition, the ASHPs need to be mounted on springs and supported off a secondary structure to prevent sound transmittal via reverberation through the new lightweight structure. A number of options for the ASHPs have been explored, and it has been determined that the most efficient option is for 3 no. larger capacity ASHPs in substitution of 6 no. smaller capacity units. This has led to a small increase in the overall height of the arrangement. It is considered this is the most efficient option with regards to meeting building loads whilst also balancing the overall height and complying with the noise level limits. An updated Noise Impact Assessment is submitted in support of the application.

In addition, the amended scheme proposes to retain the existing lift overrun (which was to be replaced as part of the approved scheme) due to the increased mechanical requirements. It is proposed that the structure and profile of the lift overrun will be reused to form the pump room housing. The existing lift overrun will be re-utilised and re-clad with metal louvres to reduce its visual impact from street level.

Finally, the amended scheme proposes to replace the existing timber ladder-type stair to the north-west terrace with a new compliant metal access stair to enable access to the plant.

#### **Non-material amendment process**

According to National Planning Practice Guidance (updated 2019), there is no statutory definition of 'non-material'. This is because it will be dependent on the context of the overall scheme – an amendment that is non-material in one context may be material in another. The local planning authority must be satisfied that the amendment sought is non-material in order to grant an application under section 96A of the Town and Country Planning Act 1990. Of relevance here:

**Scale |** The proposals involve amendments to the appearance of the Judd Street entrance and the reinstatement of an existing 28 sqm of floorspace to the scheme through the replacement draught lobby. In addition, the rooftop plant will increase in height by a small amount compared with the approved plant (by 500mm), however as it is now proposed to re-use the existing lift overrun present on the roof, the impact on the view is now no worse than the existing condition. With the exception of these this element, the heights, mass, site coverage and floorspace of the building remain within the external envelope of the consented scheme. In addition, a new structural frame is proposed, however this is within the internal envelope of the scheme – in the lightwells – and therefore will have no external impact from the surroundings. The new structural frame will not result in additional height or floorspace. Therefore, it is considered that the scale of the amended scheme in relation to the original approval is not substantially different.

**Nature |** The only other change proposed is the relocation of the bin store. This is entirely internal and does not have any impact on the external appearance of the building. No other physical or operational/functional changes are proposed as part of this application. The uses are as per the approved scheme and are not modified. The red line boundary and description of development are not affected. Consideration has been given to all aspects of the previous submission to assess whether the amendments change the impacts of the approved scheme (these are summarised briefly below).

It is concluded that, while the amendments do alter (and improve) the appearance and function of CTH, they have no other material effect on third parties. There is no change to privacy, outlook or day and sunlight considerations as the proposed heights and mass of the amended scheme do not exceed the external envelope of the approved scheme, nor do they alter the conclusions of the reports submitted with the approved scheme. The planning policy assessments all remain valid. The nature of the application is, therefore, not substantially different from the approved scheme in planning terms. A non-material amendment application is therefore appropriate in this instance. This has been confirmed by LBC planning officers in correspondence dated 28 January 2020.

#### **Planning Policy Context**

There have been no major changes in national or local planning policy since the original approval. The policies within The National Planning Policy Framework 2019 (NPPF) including the Planning Practice Guidance updated 2019 (PPG); and the Development Plan form a material consideration in the determination of this application. As per the original 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. 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.

In addition, supporting information to the Development Plan is found in the Camden Planning Guidance Documents which have also been reviewed as part of the proposed amendments, including CPG Access for all (March 2019), CPG Design (March 2019), CPG Energy Efficiency and Adaptation (March 2019) and CPG Amenity (March 2019). Other relevant guidance is within LBC Kings Cross/St Pancras Conservation Area Statement (December 2003) and LBC Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011).



## 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 considerations 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.

**Design + Heritage** | A Design and Access Statement, prepared by Purcell, is submitted in support of this application. In addition, a Heritage Impact Assessment is included at Section 4 of this design document. However, in summary, the design and heritage impact of each of the proposed design amendments is outlined below:

- **Judd Street entrance alterations:** the existing draught lobby is detrimental to the significance of the listed building due to its poor aesthetic quality and condition. The replacement draught lobby is of sensitive and high quality design which will help it to better integrate into the building than the existing lobby. The use of glazing will ensure that the proposed lobby is subservient to the main building, whilst the dark aluminium frames will complement the metal handrails and window frames. The significance of the listed building will still be improved as a result of the proposals, in accordance with Policy D1. In addition, there will be additional public benefits that will arise as a result of the improvements to the thermal and environmental efficiency of the building and quality of the internal lobby. This will improve the overall usability of the space.

The other amendment to the Judd Street entrance elevation comprises the replacement of the existing door at the top of the ramped entrance. This would result in a negligible change in impact from that of the approved scheme as the door is not an original feature and has limited visibility both from within and outside the building. This amendment also provides thermal and environmental improvements to the building, thereby securing public benefits in accordance with NPPF policy.

- **Relocation of bin store:** This amendment is entirely internal and relates only to relocating the approved new partitions. There is no impact on historic fabric nor the significance of the listed building. From a design perspective, this change ensures that the bin store is at street level and enables compliance with the 10-metre maximum pull distance for bins, as requested by Camden's waste contractor. In this regard, the proposed amendments are an improvement to the approved position.
- **1940s extension – flat roof structure:** The new independent structural frame is a new feature and therefore will have some visual impact on the existing lightwells. This will only be visible from inside the building and will not be visible externally. This solution is essential to provide sufficient structural support to the 1940s roof extension. It is considered to be more appropriate and a lot more sensitive than the other solution which would require significant interventions to the historic fabric. It is considered that any minor impact is outweighed by the overall benefits to the building, which include upgrading the lightwells and making them useable internal spaces, as well as thermally upgrading the building by covering the lightwells at roof level. The steel frames will add to the already utilitarian and industrial character of these spaces. This, together with the approved proposals to improve the appearance of the lightwells through the removal of services and conservation repairs, will result in a considerable enhancement to the lightwells, in accordance with Policy D1.

- **Rooftop plant:** The re-use of the structure and profile of the existing lift overrun ensures that the amendments to the rooftop plant are not worse than the existing situation at roof level. In terms of massing, the impact on townscape will be neutral as there will be no change from existing. In addition, the lighter, broken surface of the proposed metal louvre cladding will further reduce its visual impact where it could be visible from the surrounding area. The other areas of amended plant would not be visible from the surrounding townscape as the units remain obscured from street level behind the pitched roofs, as demonstrated by the verified views. The proposed new staircase is likely to be visible, but this is proposed to be a slender structure and so is unlikely to be perceptible when viewed in the context of the building as a whole.

In addition, the amended ASHP arrangement has been selected as it is the most efficient one for the building. This will support the BREEAM Excellent that is being targeted for the scheme.

Overall, the proposed amendments are relatively limited and do not materially affect the Heritage Impact Assessment that was approved as part of the original applications. The significance of the listed building will be enhanced as a result of the improvements to the visual integrity of the listed building through external repair and re-presentation. There will also be improvements to the setting and character of the Kings Cross St Pancras Conservation Area, as well as other heritage assets.

**Townscape + views** | New verified views have been produced and are submitted in support of this application to assess the visual impact of the rooftop plant amendments from street level. Out of the five views selected in the main application, views 1, 2 and 5 are not impacted by the proposed amendments and so are not considered in further detail.

In regard to views 3 and 4, the increased height of the ASHPs has no visual impact on these views as the units remain obscured from street level behind the pitched roofs. In the original application, the removal of the lift motor room and its replacement with a more subtle plant enclosure meant that there was an improvement on these views from street level and a beneficial effect on the townscape. The proposed amendment means that, in terms of massing, the impact on the townscape will be neutral as there will be no change in comparison to the existing. However, the proposed metal louvre cladding will help to soften the impact on the rooftop addition, improving these views from street level and its impact on the townscape.

**Noise** | An updated Noise Impact Assessment is submitted in support of this NMA application. This report reassessed the background noise criteria at the Judd Street side of the building, where the ASHPs will be installed. The noise criteria has been updated to use the background noise data at this side of the building as a more appropriate benchmark for the ASHP attenuation selection, which has enabled the total height of attenuation to be reduced. The plant addresses the required noise criteria in accordance with Policy A4.

**Energy + sustainability** | The proposed amendments do not have any impact on the conclusions previously reported and the Energy Statement that was submitted as part of the original application remains as approved. BREEAM Excellent is still being targeted for the site.

**Other consideration** | No changes are required to any of the other approved documents. All other technical aspects remain as approved.

#### **Summary**

Overall, the proposed amendments cause less than substantial harm in accordance with NPPF terminology and are fully justified in the context of the works. The proposed amendments also secure further public benefits, in line with national and local planning policy, including creating more efficient and usable space within the Town Hall. They fully respect the special architectural or historic interest of the listed building. The proposals will facilitate the already approved scheme to ensure that the building is optimal in its function, layout and design, and will support the LBC's function and mission and thus continue enhancing the building's important status and significance.

Yours sincerely,

**Vicky Cartwright | Director**  
**The Planning Lab**