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London Borough of Camden
Development Management Team
5 Pancras Square
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24th August 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 amendments to the scheme which has evolved since the grant of consent, namely changes to the SME office lobby on Bidborough Street including combining the goods and bikes lift and installation of a sliding door instead of a revolving door. 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 SME office lobby on Bidborough Street to include installation of a double sliding automatic door and internal reconfiguration to accommodate a single dual purpose lift."

Application content

This application for an NMA and listed building consent has been submitted via the Planning Portal (ref: PP-09000238 and PP-09000300). The following make up the application and supporting documents:

- Application form
- Location Plan at scale 1:1250
- Approved and proposed Plans
- Drawing list
- Design and Access document prepared by Purcell (*includes a Heritage Impact Assessment*)

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. A fee of £234 has been paid for the NMA.

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 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.

There is currently a live NMA and listed building consent application ref: 2020/1992/L and 2020/1990/P which includes 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. These applications are due to be determined imminently.

This NMA and listed building consent application seeks further minor amendments which were discussed during a meeting with design officer, Colette Hatton on 29th July, who confirmed that the amendments can be submitted before the determination of the live NMA and listed building consent application ref: 2020/1992/L and 2020/1990/P.

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 2016 (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 Amenities (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 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.

Proposal and assessment of works

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

SME/office lobby alterations | In the approved scheme, it was proposed to have an environmental lobby with a new revolving door within room G.42. Following detailed design review, the proposal will replace the revolving door with a double sliding automatic door. This will improve the flow of movement entering and exiting the building. This will also improve the environmental performance of the building. This area has been noted in Purcell's significance plans as neutral significance. The change will also not impact on existing fabric that was not previously approved. Therefore, there is no harm to the significance of the listed building. This change will also not be seen externally so it will not affect the appearance of the conservation area.

Single dual use lift | There were two lifts proposed to serve the Ground to Basement level for bikes and goods separately in the SME/office lobby. It is now proposed to combine the two functions and reduce the number of goods and bike lift from two to one. This reduction will create more space in room G.57 and additional cycle parking spaces which will have a capacity of 91 spaces. This would result in a reduced amount of demolition required as only a single lift pit would be required. Therefore, the reduction in lifts will not impact on the significance of the listed building.

Overall, the proposed amendments are limited in nature. The significance of the listed building will be enhanced as a result of the improvements to the visual integrity and the usability of the listed building.

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.

If you have any questions, please contact susie@theplanninglab.com or melanie@theplanninglab.com.

Yours sincerely,

Susie Taylor
The Planning Lab