

David Fowler and Colette Hatton
London Borough of Camden
Development Management Team
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18 August 2022

Dear David and Colette,

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 were 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 (E class), and the change of use of the Camden Centre from Sui Generis (Town Hall) to events use (E class), as well as external physical works.

This NMA application seeks non-material amendments to the scheme which has evolved since the grant of consent following detailed design, namely changes to the accessible toilet, a new door between the office lobby and Camden Centre lobby and the creation of a new community space at ground floor and associated new louvre and extract duct. This application is submitted following an email exchange with LBC planning and design officers, who confirmed the changes are positive and would not object to alterations that are more in line with the original layout.

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 at ground floor to the accessible toilet, a new door between office lobby and Camden Centre lobby and the creation of a new community space and associated louvre and extract duct in Camden Town Hall.”

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 statement 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 online 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 Mansion 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. The areas affected by this application are of neutral significance as noted in the heritage impact assessment by Purcell.

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, particularly the public facing uses resulting in significant conservation, economic and social benefits to the borough.

An NMA and listed building consent application ref: 2020/1992/L and 2020/1990/P approved some minor changes in November 2020. These include the installation of a new slimline draft lobby to improve thermal conditions within the lobby on Judd Street; 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.

Another NMA and listed building consent application was also approved in November 2020 sought further minor amendments which included changes to the lobby door and lifts on the Bidborough Street elevation (ref: 2020/3862/P and 2020/3849/L).

Proposal

LBC is seeking to further improve the functionality and community benefit of the Town Hall through some minor alterations to the approved scheme. These changes include:

Accessible toilet and changing places | Under the approved scheme, a new accessible toilet facility (Room G.09) and a kitchen (Room G.10) were introduced adjacent to the wedding suites on the ground floor. It is proposed to alter Room G.09 to enlarge this room to accommodate a changing places facility in accordance with Government guidelines. This will reduce the size of the kitchen but there will be no change to the overall footprint of the combined toilet and kitchen area and the access off the corridor is unchanged.

New Community Space | There has been some changes to the Council's occupational requirements including a reduced requirement for the quantity of registry rooms and the need for a second registry waiting area (Room G.24). Additionally, the requirement for a records

store and changing rooms are no longer required. This presents an opportunity to relocate the back of house office space into these redundant spaces. The current back of house office space is located in Room G.17, this will be relocated to the now redundant room G.24. This allows the introduction of the new accessible Community Room in Room G.17. New heritage style doors (replicas of existing door types) will also be introduced in G.17 and G24 to access the corridor. The door details can be found in Appendix A of the DAS. The increased occupancy in Room G.17 will also require more ventilation capacity, a new intake louvre and extract duct will be installed into Lightwell 3 services core and the extract will run up to roof level just above the curtain walling parapet.

Door between office lobby and Camden Centre | The approved scheme includes blocking up of the door between G.42 and G.47 to be blocked. LBC is seeking to reinstate this link with a new door.

Planning Policy Context

The policies within The National Planning Policy Framework 2021 (NPPF) including the Planning Practice Guidance 2021 (PPG) form a material consideration in the determination of this application. The Development Plan is formed of the GLA's London Plan 2021, and the Camden Local Plan is comprised of: The Camden Local Plan July 2017; the Site Allocations Plan September 2013; and the Policies Map (updated version) January 2019. These documents are supported by Camden's Planning Guidance Note on Design and the Kings Cross /St Pancras Conservation Area Appraisal 2011.

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.

Assessment of works

LBC is now proposing some minor amendments at ground level at the Camden Town Hall to accommodate a new accessible toilet, changing places and a new accessible community space. The proposed works mostly include the rearrangement of back of house areas and releasing more space to accommodate public facilities. There is no change of use attributed to the new community space and changing places; they remain an important ancillary function of the CTH's primary use as a Town Hall (in Sui Generis use class).

Accessible toilet and changing places | The approved scheme consented a new accessible toilet and a new kitchen in this location so the principle of altering this area has already been accepted. There is some minor removal of fabric proposed in order to accommodate the new accessible toilets and change places. This area is also considered to be of neutral significance and therefore Purcell has confirmed in the accompanying heritage impact assessment that the proposed alteration will not impact the significance of the overall listed building. The proposals will also comply with the Government guidance on accessibility and policy C6 of LBC's Local Plan.

New Community Space | LBC is proposing to create this new community space to provide an accessible meeting and events space. In order to make the space more usable, LBC wishes to remove the modern partitions which is more in line with the original 1937 configuration (see ground floor archive plan on p.10 of the DAS). This would also open up some original back of house spaces which are not publicly accessible allowing the public to appreciate more of the listed building. The proposal therefore is considered to result in heritage

benefits. The new sets of doors will replicate the existing doors on the corridor to reflect the historic character for visual cohesion. This new space requires more ventilation therefore a new hole will be created for a new air intake louvre. A new extract duct is proposed to run through the lightwell up to roof level. The heritage impact assessment by Purcell confirms that this area is low significance due to the back of house utilitarian nature. The extract duct will also only extend just above the curtain walling parapet and therefore will not be visible and will not impact on the appearance of the listed building and the conservation area, complying with LBC Policy D1 and D2. The extract will not impact on the amenity of nearby neighbours as it has been confirmed that the noise levels will not be altered and therefore fully complies with LBC policy A1 and A4.

Door between office lobby and Camden Centre | The approved scheme consented the connection between the Town Hall and the Camden Centre to be blocked. LBC is seeking to reinstate this connection by reinstalling a set of doors. The details of the door are in Appendix A of the DAS. The proposed door will adopt a discreet and neutral style to match the door opposite and therefore the appearance will not be impacted. The heritage impact assessment confirms that this amendment will have no impact to the significance of the 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 are considered negligible. The proposed amendments also secure further public and heritage 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