



Donald Insall Associates
Chartered Architects and Historic Building Consultants

**Space House, 1 Kemble Street
& 43-59 Kingsway WC2**

Historic Building Report and Heritage Views Impact Assessment
For Seaforth Land

May 2019



KEMBLE STREET

Camden
**WILD
STREET**

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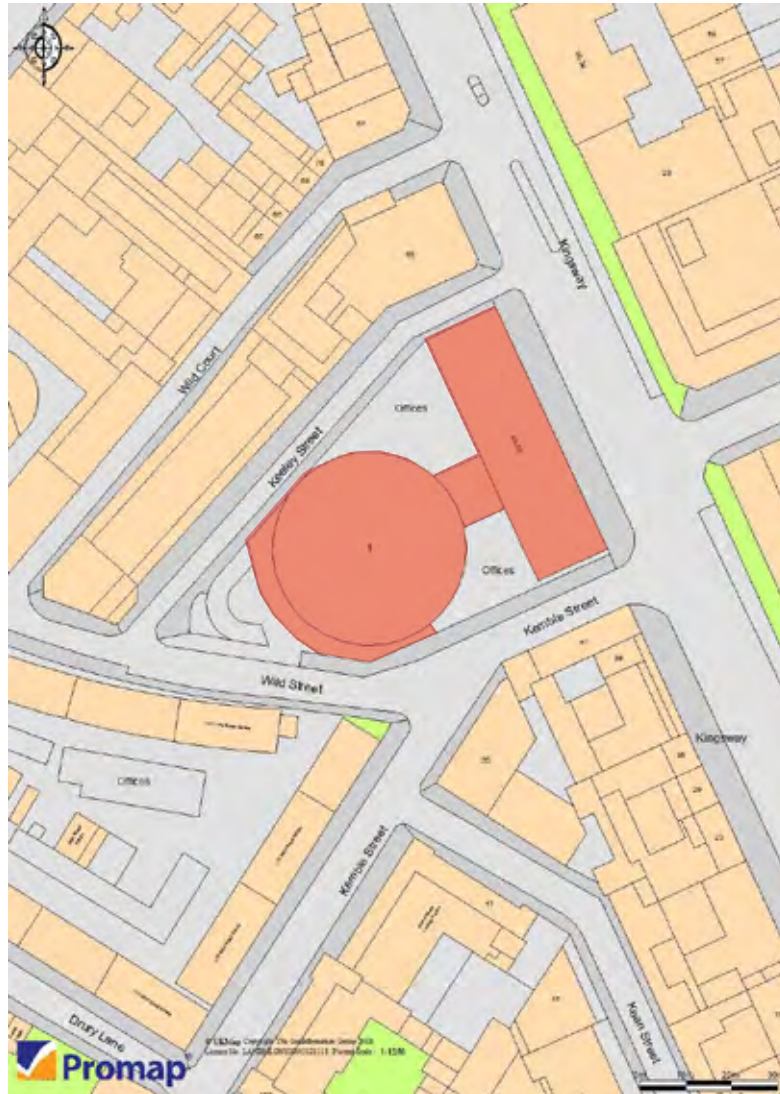
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Ordnance Survey map with the site marked in red.

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1.0 Summary of Historic Building Report

1.1 Introduction

Donald Insall Associates was commissioned by Seaforth Land on behalf of the applicant, SLQR Trustee No. 1 Ltd. and SLQR Trustees No. 2 Ltd. as Co-trustees for Unit Trust No. 3, in June 2018 to assist them in the preparation of proposals for Space House, 1 Kemble Street and 43-59 Kingsway, WC2B 6TE.

The investigation has comprised historical research, using both archival and secondary material, and a site inspection. An illustrated history of the site and building, with sources of reference and bibliography, is in Section 2; the site survey findings are in Section 3. The investigation has established the significance of the building, which is set out below. This understanding has informed the development of proposals for change to the building. Section 4 assesses the impact of the existing building and proposed scheme on conservation area, metropolitan and London views. Section 5 provides a justification of the scheme according to the relevant planning policy and guidance.

1.2 The Building and its Legal Status

Space House is a Grade II-listed building located in the London Borough of Camden. The rectangular block facing Kingsway is located within the Kingsway Conservation Area, whilst the tower behind it is not within a conservation area but is adjacent to the Kingsway and Seven Dials (Covent Garden) Conservation Areas in Camden and The Strand Conservation Area in the City of Westminster. The tower is also visible in views from the Bloomsbury Conservation Area in Camden, from the Covent Garden Conservation Area in the City of Westminster and from View 16A of the London View Management Framework, comprising the river prospect looking from the south bank toward Somerset House. The buildings are within the setting of a number of other listed buildings, including the Grade II-listed Kodak House (1911) opposite Keeley Street; the Grade II* Connaught Rooms (largely of 1863-4 with a 1930s block to the rear) immediately north of this; the Grade II* Freemasons' Hall (1927-33) to the northwest of the site; the Grade II-listed Bruce House (1907) to the south; and the Grade II-listed Kingsway Chambers (1913) and 40-42 Kingsway (1908-9, by Lutyens) to the northeast. In addition, two Grade II-listed telephone kiosks are situated immediately opposite the site on Kingsway. Development which affects the special interest of a listed building or its setting requires listed building consent, and development in a conservation area may also require planning permission.

The statutory list description is included in Appendix I and a summary of the conservation area statement provided by the local planning authority is in Appendix II, along with extracts from the relevant planning policy documents.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. Sections 66 and 72 of the Act impose a statutory duty upon local planning authorities to have 'special regard to the

desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess' and to 'pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas'.

In considering applications for listed building consent or planning permission, local authorities are also required to consider the policies on the historic environment set out in the National Planning Policy Framework 2019. At the heart of the Framework is 'a presumption in favour of sustainable development' and there are also specific policies relating to the historic environment. The Framework states that heritage assets are 'an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'. The Glossary to the National Planning Policy Framework defines a heritage asset as:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

The Framework, in paragraph 189, states that:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Section 1.3 of this report – the assessment of significance – meets this requirement and is based on the research and site surveys presented in sections 2 and 3, which are of a sufficient level of detail to understand the potential impact of the proposals.

The Framework also, in paragraph 193, requires that:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and that 'the more important the asset, the greater the weight should be). This is irrespective of whether the any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

The Framework goes on to state at paragraph 194 that:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.

Section 5 of this report provides this clear and convincing justification.

The Framework requires that local planning authorities categorise harm as either 'substantial' or 'less than substantial'. Where a proposed development will lead to 'substantial harm to (or total loss of significance of) a designated heritage asset', the Framework states, in paragraph 195, that:

... local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use.

Where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, the Framework states, in paragraph 196, that:

...this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

The Framework requires local planning authorities to look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. Paragraph 200 states that:

Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Concerning conservation areas it states, in paragraph 201, that:

Not all elements of a Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole.

The proposed development must also accord with the policies in the **London Plan (March 2016)**. Policy 7.8 considers the Historic Environment and states:

Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail

Where a proposed scheme would affect the strategic views designed within Policy 7.11 of the London Plan, Policy 7.12 stipulates that:

New development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the strategic views and their landmark elements. It should also preserve or enhance viewers' ability to recognise and to appreciate strategically important landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.

In regards to the foreground of a designated view, new development should:

...not be overly intrusive, unsightly or prominent to the detriment of the view

And development in the background of a view should:

...give context to landmarks and not harm the composition of the view as a whole. Where a silhouette of a World Heritage Site is identified by the Mayor as prominent in a Townscape or River Prospect, and well preserved within its setting with clear sky behind it, it should not be altered by new development appearing in its background. Assessment of the impact of development in the foreground, middle ground or background of the view or the setting of a landmark should take into account the effects of distance and atmospheric or seasonal changes.

The policies in the London Plan are informed by the **London Views Management Framework SPG (LVMF)**, which provides detailed guidance on the management of each designated view. These views are grouped into four categories: London Panoramas, River Prospects, Townscape Views and Linear Views. Where a proposed development would affect one or more view, the framework requires an applicant to include a description of each view and provide a justification of visual change.

The view relevant to this development is **View 16A, River Prospect: The South Bank**. A description of this view and a justification of any visual change is provided Sections 3.1.3 and 4.2, and guidance set out in the LVMF is included within Appendix II of this report.

The **Guidelines for Landscape and Visual Impact Assessment (GLVIA)**, published in 2013, set out a framework for assessing the impact of new development on landscapes and on views. The guidelines can be applied both for Landscape and Visual Impact Assessments (LVIAs) that form part of an Environmental Impact Assessment (EIA), or as an appraisal of development proposals for town planning purposes.

The definition of landscapes set out in the GLVIA is broad, and includes rural landscapes, seascapes and townscapes (GLVIA, paragraph 2.5). The GLVIA sets out a suggested methodology for LVIAs, but makes it clear that this methodology is not prescriptive, stating that the approach and methodology adopted should be 'appropriate to the particular circumstances' of the proposal that is being assessed (1.20).

The GLVIA distinguishes between effects of development on two different elements, namely on **landscape as a resource**, and on **views and visual amenity**.

It sets out a suggested **key methodology** for LVIA's when they are standalone appraisals rather than part of an EIA, and these are in summary form (3.2):

- to specify the proposed change;
- to describe the effected landscape and views;
- to predict effects on the landscape and views (but not the significance of these effects); and
- to consider mitigation measures.

An assessment of the impact of the proposals on both View 16A of the LVMF and local views selected by Camden Council is provided in Section 4 of this report.

1.3 Assessment of Significance

Space House was built in 1964-8 to the designs of the architect George Marsh of Richard Seifert and Partners, London's most prolific mid-century commercial practice, as a speculative office and showroom development for London property mogul Henry Hyams. The building has historic interest for its association with Marsh, Seifert and Hyams, one of the most successful developer-architect partnerships operating in London in the 1960s, who were also concurrently working in collaboration on Centre Point (now listed at Grade II), one of London's earliest skyscrapers.

The site comprises two buildings: an eight-storey slab block facing Kingsway and a 15-storey (plus basements) cylindrical tower to the rear of the site, connected by a two-storey bridge link. The primary significance of the buildings lie in their innovative use of a partial pre-cast concrete frame and how this is expressed in their differing slab and cylindrical forms, their spatial relationship and external elevations. The sculptural way in which the structure is handled, with interlocking cruciform shapes and Y-shaped pilotis on the tower in polished concrete, and tapered pilotis and slab formation in polished granite on the Kingsway block, creates a striking sculptural effect. The side elevations of the Kingsway block, which include interlocking structures inspired by a Greek-key motif, also make an artistic contribution to the surrounding public realm.

Not all aspects of the external elevations contribute to the buildings' significance however, as some elements have been altered or replaced. Detracting elements of the tower include the modern plant and telecommunications equipment on the roof, which are also visible in long-distance views from Kingsway and Russell Street in Covent Garden, the modern double-height glazed façade and entrance sign at ground floor level, together with exposed low-level plant. Detracting features of the Kingsway block include the modern enclosure around the former external stair on its south side of the Kingsway, which also obscures the tapered pilotis, the modern glazed and aluminium panelled façade fronting onto Kingsway, as well as the modern glazing to the north entrance and extended canopy.

At the west end of the building there are three original vehicular entrance and exit ramps leading to a two-storey underground car-park, the latter of which has been heavily altered and is of no significance. The ramps, together with their associated access stairs, are of moderate significance as part of the original plan and evidential use of the site, but make little contribution to the appearance of the building.

To the north and west of the tower there are also two original intake and extractor units, the former encased in a kidney shape enclosure clad in a grey coloured mosaic, and the latter under a polygonal concrete plinth. Both are frequently used as benches by members of the public and form part of the surrounding public realm, which, otherwise, was never of great quality and in addition has been heavily altered with unsightly tarmac surfaces, bollards and visually detracting railings.

Internally, the buildings were originally designed as open-plan offices and showrooms, but have since been subdivided with new partitions and furnished with new fixtures and fittings to create modern office interiors that are of no significance. There are also suspended ceilings throughout the majority of both buildings, which detract as they truncate the original window apertures. There are however some original features that survive which are of high significance; in the Kingsway block these features include the original staircases at the north and south end of the building, as well as black marble cladding and a gilded inscription tablet in the main foyer. Within the tower, the original features include the main staircases and the terrazzo staircase between the ground and first floor at the rear of the lobby, which also contains some sections of original mosaic cladding on the walls, are of significance. There are also two original mixed mode ventilation ducts running through the centre of the tower; however these are of little significance as they have been enclosed at roof level with detracting plant decks, and altered with new openings and windows.

The special interest of the buildings is manifest in the fabric, which has the following hierarchy of significance.

Of the **highest significance** and particularly sensitive to change are:

- The external elevations of the tower, link-bridge and Kingsway block, not including the detracting elements listed below; and
- The original structural forms and elements of the building, including the pre-cast concrete frames in their slab and cylindrical forms, concrete pilotis and their spatial relationship to each other.

Of **high significance** and also sensitive to change are:

- The original kidney-shaped intake vent enclosure at the junction of Keeley Street and Wild Street, and the polygonal concrete plinth concealing the extract vent to the north; and
- The original elements of the interiors including the staircases in both the tower and Kingsway block, and the marble panelling and inscription tablet in the foyer of the Kingsway block.

Of **moderate significance** and therefore broadly adaptable are:

- The original vehicular ramps and associated staircases to the rear of the tower block.

Of **neutral significance** and therefore adaptable are:

- The two-storey basement car park and storage areas; and
- The modern interiors throughout both buildings, which have been subdivided with modern partitions, fixtures and fittings.

Factors which **detract** from the buildings' significance and should therefore be addressed are:

- The modern additions to the ground floor of the tower, including the glazed entrance lobby, entrance sign, canopy and low-level plant;
- The conspicuous plant and communications services on the roof of the tower, which also cover the original mixed mode ventilation ducts;
- The ground floor enclosure around the former external stair and concrete pilotis on the south side of the Kingsway block;
- The modern ground floor glazing and aluminium panels on the east side of the Kingsway block, together with the modern extension of the canopy over the north-east foyer and the modern staircase within;
- The modern metal railings enclosing the ramps and forecourt to the rear of the tower and the poor quality public realm around the entire site;
- The numerous suspended ceilings in the interiors of both buildings; and
- The clutter of modern services, access stairs and platforms installed within the two internal mixed-mode ventilation ducts within the tower.

The Kingsway block of Space House is also located within the **Kingsway Conservation Area**. The building adds a strikingly modern contrast to the robust and otherwise fairly institutional Edwardian character of the area. Its elegant use of varied heights, modern materials and Brutalist principles draws the eye and injects energy and interest into the surrounding Portland-stone streetscape, while the slab block elevation remains sensitive to the built scale of the street. The Kingsway block therefore makes a positive contribution to the conservation area; however the modern aluminium panels enclosing the ground floor detract as they weaken the design of the building.

The tower, whilst not in the conservation area, makes a positive contribution to the setting of the conservation area, though roof level plant visible from Kingsway detracts. The present clutter of roof-level plant and servicing is also visible in views from the adjacent conservation areas listed in Section 1.2, and detracts from the interest and contrast that the Modernist commercial building otherwise contributes to local views within largely Victorian and Edwardian commercial (**The Strand, Covent Garden** and **Seven Dials**) and institutional (**Bloomsbury**) streetscapes.

1.4 Summary of Proposals and Justification

As noted in the assessment of significance, Space House is a decidedly Modernist composition originally designed as a speculative commercial office block. Its two integrated components – a cylindrical tower and rectangular slab connected by an enclosed link bridge – are comprised of perceptible structural forms and materials meant to be visually considered in tandem, and were a deliberate, mid-20th century departure from the heavy Edwardian aesthetic of Kingsway. Noticeably less attention was paid to the buildings' interiors, which were largely open plan, utilitarian and – typical of the Seifert-Hyams partnership – unabashedly designed to maximise lettable space.

Despite this, the site struggled to attract consistent tenancy and commercial success, and has arguably gone underutilised as a Modernist London landmark. Present proposals by Squire and Partners provide an opportunity to revive some of the architectural rigour of the 1960s design through its refurbishment whilst opening up back-of-house

spaces, rationalising ground floor areas to both the tower and slab blocks to accommodate a retail and restaurant offer, and improving interior circulation to office spaces. The proposals include roof extensions to both blocks; these have the potential of making high-quality architectural contributions to the rooflines visible from the Kingsway Conservation Area and in wider views.

A major part of the proposals is the particular consideration paid to improving the surrounding public realm to the sides and rear of the site, including the rationalisation of servicing arrangements, an aspect which was largely overlooked in the original scheme. Thus, this report considers that overall the proposed scheme preserves the significance of the listed heritage asset whilst improving the offer of its optimum viable commercial use, while enhancing the appearance of the surrounding townscape and that of the adjacent conservation area. Section 5 of this report analyses the heritage impact of these proposals in more detail.

2.0 Historical Background

2.1 Area History: Holborn and Kingsway

High Holborn follows the path of a Roman road which led west from the City. From the Middle Ages it was home to a number of grand suburban houses, several of which eventually became lawyers' colleges; Gray's Inn and Lincoln's Inn are the two which remain.¹ Great Queen Street, slightly south, was laid out by the 13th century as a continuation of the north side of Lincoln's Inn Fields and was built up with grand houses from the early-17th century, visible in William Morgan's map of 1682 **[plate 1]**. Much of this early network of narrow streets to the north and south of Great Queen Street still defines the area's contemporary layout.

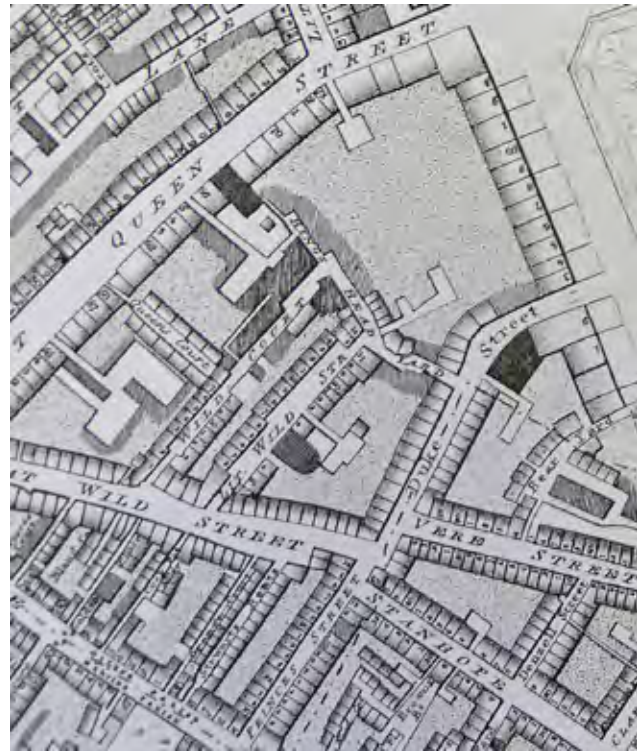
The area south of High Holborn continued to develop throughout the 18th century; by 1799 the large buildings on Great Queen Street, Weld Street and Duke Street had been replaced with small terraced houses, with narrow streets and alleys projecting northeast into their former gardens from Wild (previously Weld) Street **[plate 2]**. By 1841 the population of Holborn had grown to 94,000 and, as its more affluent residents moved further west, the status of the area rapidly declined and became home to some of London's most notorious slums, including Seven Dials and St. Giles. The Ordnance Survey map of 1873 shows that many of the earlier open yards and gardens to the rear to the terraces along Great Queen Street, Great Wild Street, Duke Street and the western side of Lincoln's Inn Fields had been infilled by rear extensions and larger buildings, including the Freemason's Hall to the south side of Great Queen Street, retaining very little open space **[plate 3]**. However, a good deal of Holborn's crowded quarters were transformed by the laying-out of several new roads linking the City to the West End in the mid-to-late 19th century, including New Oxford Street in 1847, Holborn Viaduct in 1869, Clerkenwell Road in 1878, Shaftesbury Avenue in 1886 and Charing Cross Road in 1887. While the resulting architecture associated with the new road works was of some quality, it was rarely grand; much of this was due to the constraints of the Metropolitan Street Improvements Act of 1877, which required the rehousing of those displaced by the new roads, resulting in a number of less-than-remarkable mansion blocks.²

1 Cherry and Pevsner, 2002, p. 249.

2 Cherry and Pevsner, 2002, p. 253.



1 William Morgan's map of 1682 (British Library)



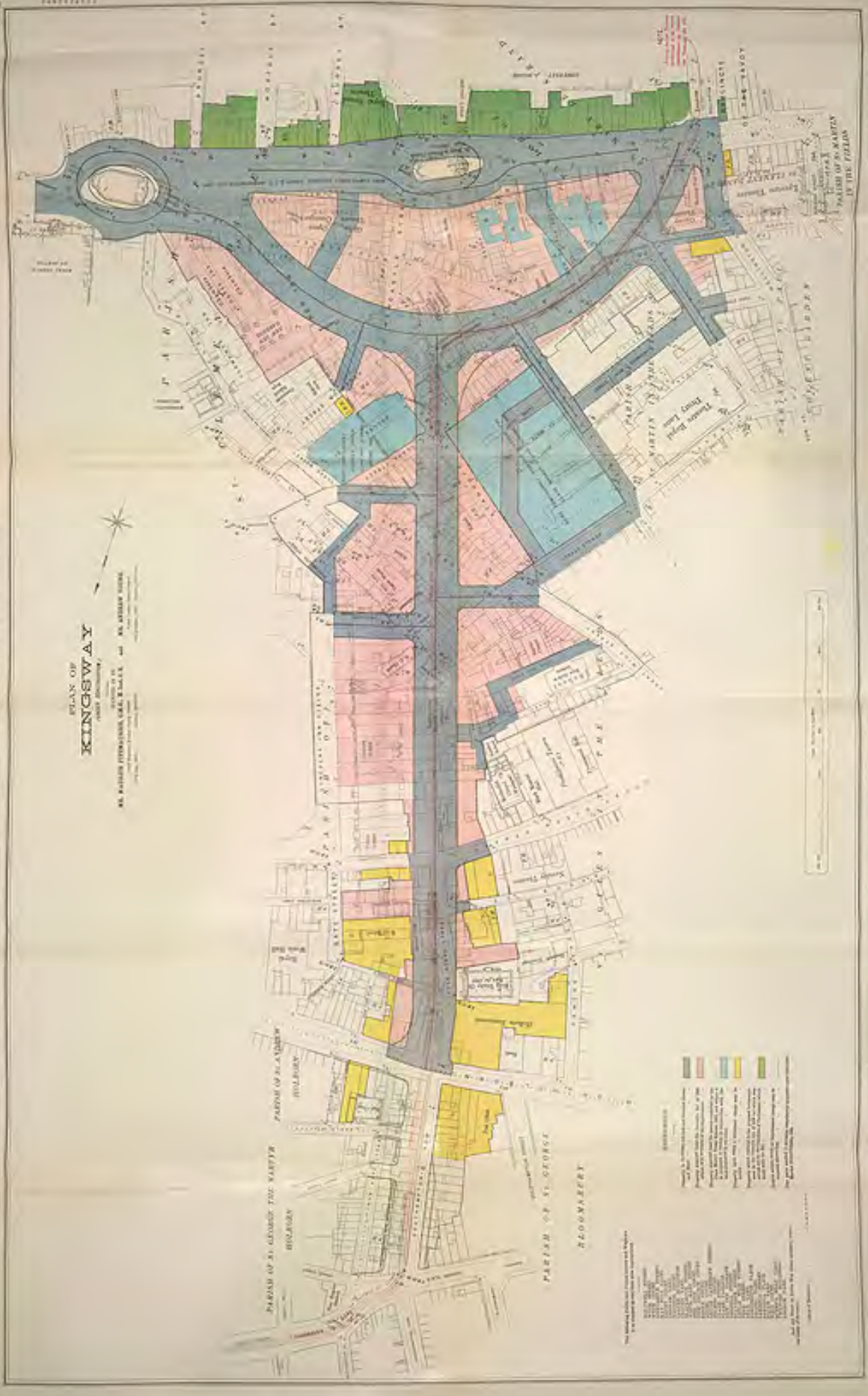
2 Horwood's map of 1799



3 1873 Ordnance Survey map

ROYAL COMMISSION ON LONDON TRAFFIC.

PLATE XVIII.



4 Plan of Kingsway, 1905 (British Library)

Kingsway, one of London's last great Victorian metropolitan improvement schemes, would be a departure from this. A 28-acre, £5 million redevelopment project by the newly-formed London County Council, the scheme included the construction of the crescent at Aldwych, which had been the topic of regular discussion for decades after Drury Lane and Chancery Lane, the extant roads linking Holborn and the Strand, had proven unable to cope with the challenges of Victorian traffic congestion.³ Laid out between Lincoln's Inn Fields to the east and Covent Garden to the west the scheme also provided opportunity for slum clearance and the erection of new housing in adjacent streets. However, Kingsway was planned with the deliberate grace and stateliness of a grand Edwardian avenue lined with trees and commanding commercial buildings, which were largely executed in a Beaux Arts style. A 1905 plan of the scheme illustrates its intended grandeur as it swept northwards from the Aldwych crescent along a broad path that altered the layout and intersections of the streets to either side [plate 4]. The 1914 Ordnance Survey map provides a view of the development within the context of its surrounding streets and of the larger commercial buildings which flanked it [plate 5]. While much of Holborn would go on to suffer the brunt of wartime bomb damage, Kingsway survived largely unscathed. As a result, much of its intended statement as a leafy showpiece of Edwardian townscape remains legible today.

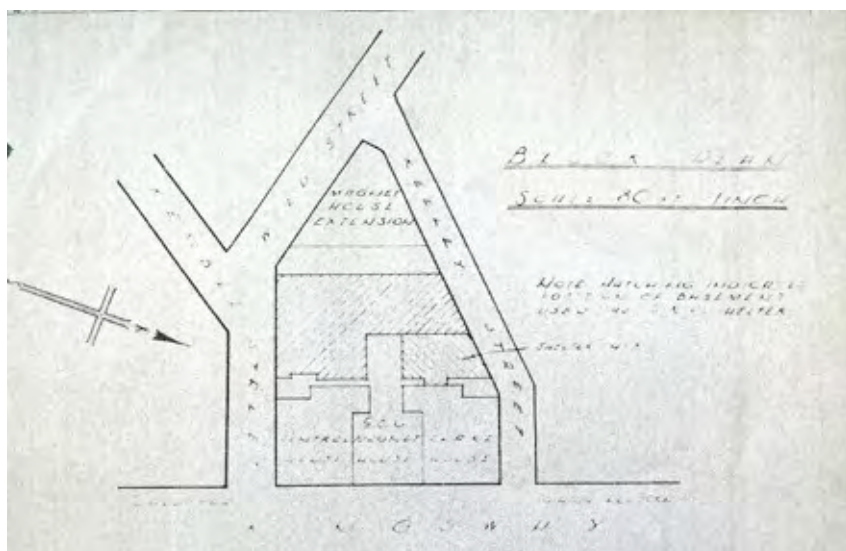


5 1914 Ordnance Survey map

3 Weinreb, Hibbert, Keay and Keay, 2008, p. 465.

2.2 The Building: Space House

Nos. 43-59 Kingsway and 1 Kemble Street were built in 1964-68 on the site of an imposing Edwardian office block called Magnet House, which had extended the full width of the plot between Kemble Street and Keeley Street and had been occupied by the General Electric Co. Ltd. A site plan indicates that Magnet House also comprised a large extension to the rear of the site by 1941, infilling the western corner of the triangular plot between Wild Street and Keeley Street [plate 6], which appears to have replaced a Baptist Chapel marked on the 1914 Ordnance Survey map (see plate 5).



6 Magnet House, Kingsway site plan, 1941 (Camden Archives)

The new buildings were erected by Robert McAlpine and Sons to the designs of architects Richard Seifert and Partners, but it was George Marsh, a leading practice partner recognised for his bold Modernist aesthetic, who was largely responsible for the scheme. Initially known as Space House, the site was conceived as a speculative office and showrooms development for London property magnate Harry Hyams, who was already in partnership with Marsh and Seifert on the scheme for Centre Point just a half mile to the west. The proposals were a stark departure from the Edwardian block which occupied the site, as well as from the surrounding early-20th century Portland stone buildings which dominated the Kingsway streetscape; only the curtain-walled façade of the 1960 Royalty Theatre (now the Peacock Theatre) to the southeast provided contrast.

Early presentation drawings of the scheme illustrated two options: one featuring an eight-storey rectangular block on slender corner plinths with a glazed ground floor facing Kingsway [plate 7], and a second, more ambitious design which included a cylindrical tower rising sixteen storeys behind the rear of the slab block on elegant, Y-shaped pilotis [plate 8]. The latter option was ultimately built.



7 1963 presentation drawing of Kingsway block by R. Seifert (RIBA Drawings Collection)



8 1963 presentation drawing showing full scheme by R. Seifert & Partners (RIBA Drawings Collection)

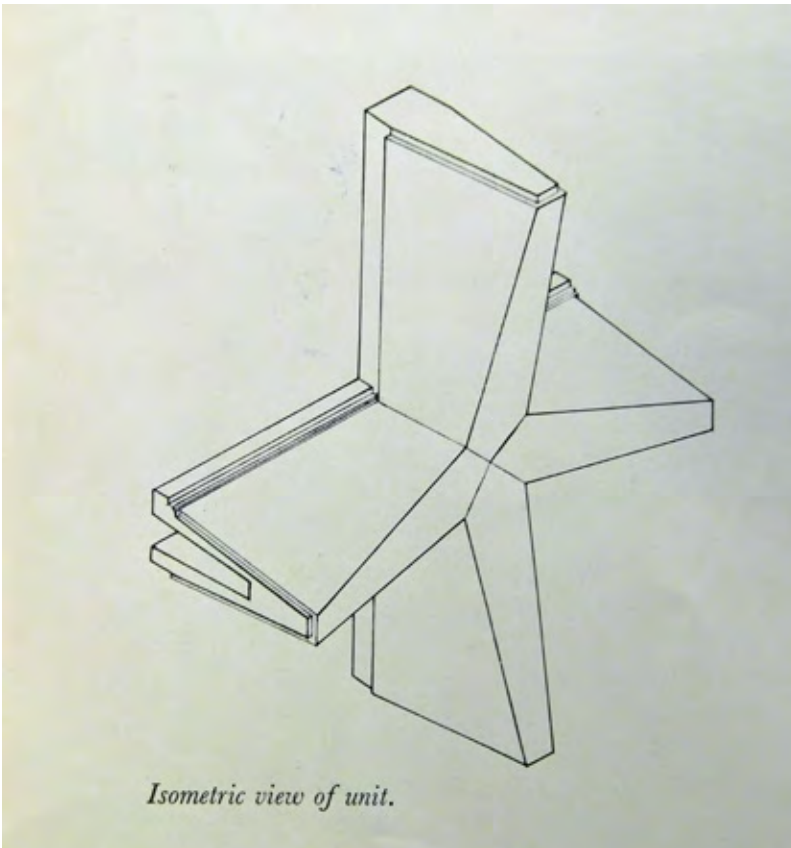
2.2.1 Initial Development

Marsh and Seifert borrowed from their earlier design at Centre Point for the Space House tower block, including the use of dense, Y-shaped columns to elevate the structure above a double-height ground-floor public entrance, which served as the principal entrance to both blocks. The columns supported a modular structure of three-meter-high cruciform blocks in precast concrete that interlocked to form a cylindrical shell perforated with deep-set glazing in aluminium frames, while ring beams provided additional support to precast concrete floors at the core of the building.⁴ A 1968 feature in *Systems, Building and Design* illustrated the cruciform shape and how the components were assembled [plates 9A-B]. Externally, the cylindrical shape of the tower was designed to preserve the daylight to the much lower neighbouring buildings in Wild, Keeley and Kemble Streets. Automobile access for private and public visitors also played a significant role in the design of the forecourt, with the corner of the plot to the west of the tower designed to allow car traffic in and out of underground car parks. A single exit ramp fed into Keeley Street, while two entrance ramps were set somewhat closer to the building; one from Kemble Street led into a private garage while one from Keeley Street led into a public garage, one over the other in a scissor pattern. A 1964 plan by Seifert and Partners illustrates the initial circulation of these ramps, with petrol services provided for in the central island [plate 10].

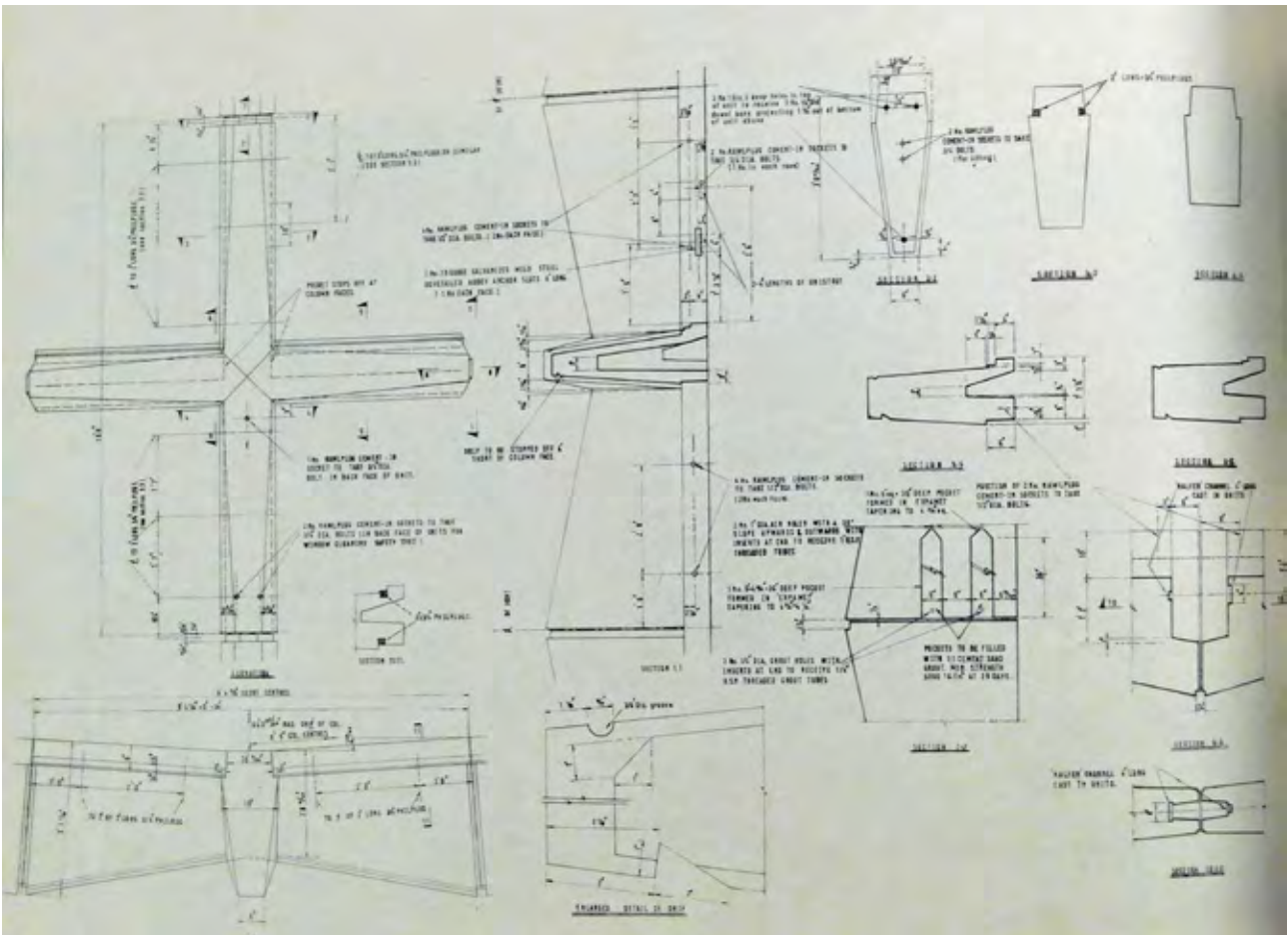
The ground floor principal entrance comprised three pairs of doors and a revolving door between four inner columns set below a dropped canopy ten feet in height, which continued into an entrance hall clad in marble and terrazzo. A 1968 elevation drawing included in the *Systems, Building and Design* feature illustrates how the entrance was recessed below the tower, and how it also aligned visually with the projecting 17th floor at the roofline, which was substantially set back and glazed [plate 11]. A central access core leading to upper floors comprised four lifts and two curved staircases leading to showrooms. In addition to a London Electricity Board substation along the northern side of the tower, this was the only ground floor accommodation.⁵ The same drawing provides a view of the original south elevation of the Kingsway block, also set on angled pilotis with interlocking sculptural elements and an exposed staircase leading from the street up into the first floor in a shape that mirrored design above. A fairly large services compartment was also located on the roof, set back from the Kingsway façade. The Kingsway elevation comprised a 23-bay curtain-walled façade to the street with a recessed ground floor in full-height glazing; this block was deliberately kept at a height in-keeping with the scale of the Kingsway streetscape [plate 12]. The cruciform shape was also utilised here, but the windows remained flush. An additional entrance hall was set back from Kingsway at the northeastern corner; this was decidedly more subdued than the site's principal tower entrance and was only serviced by two lifts.

4 Honikman, 1968, p. 18.

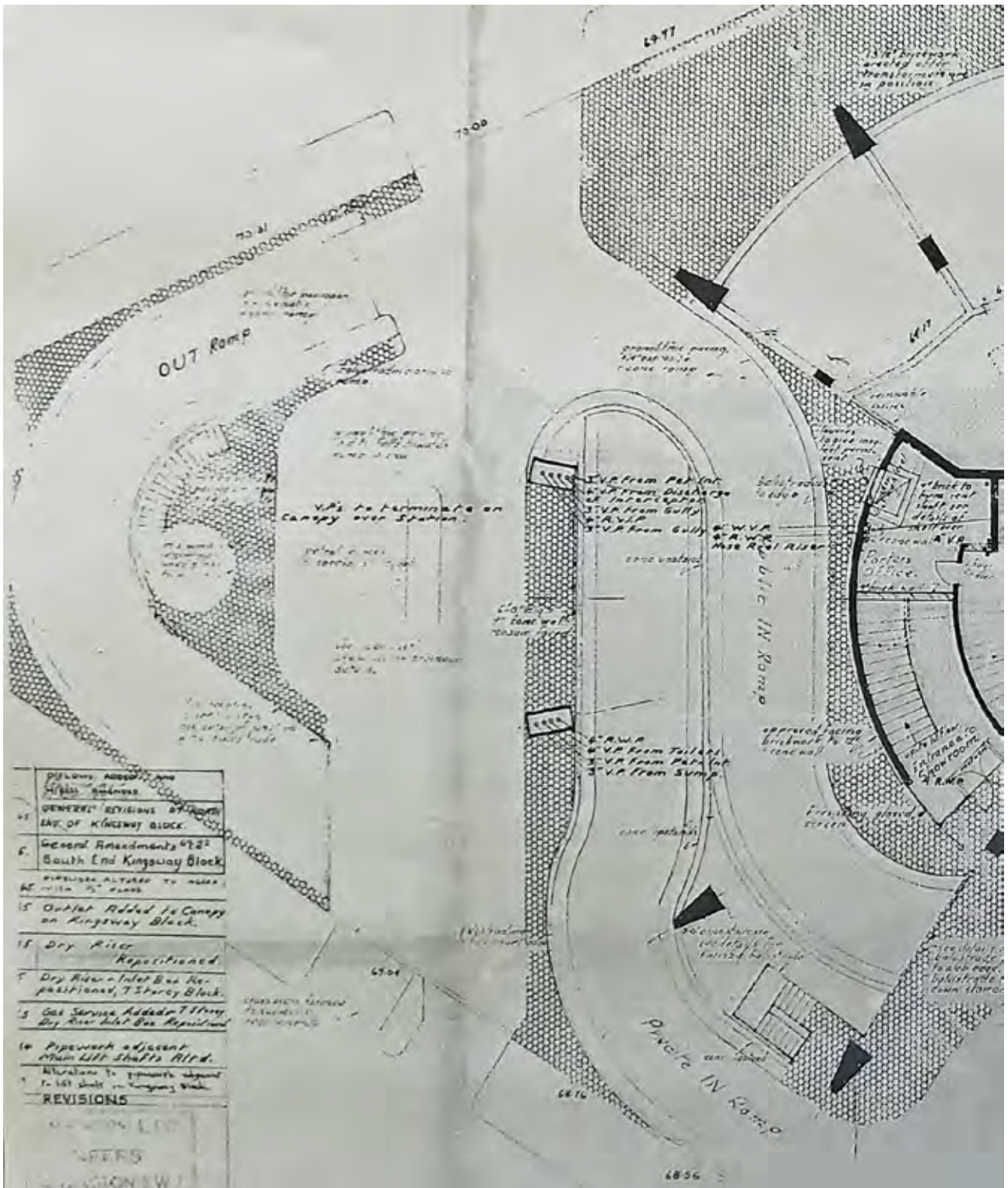
5 Honikman, 1968, p. 14.



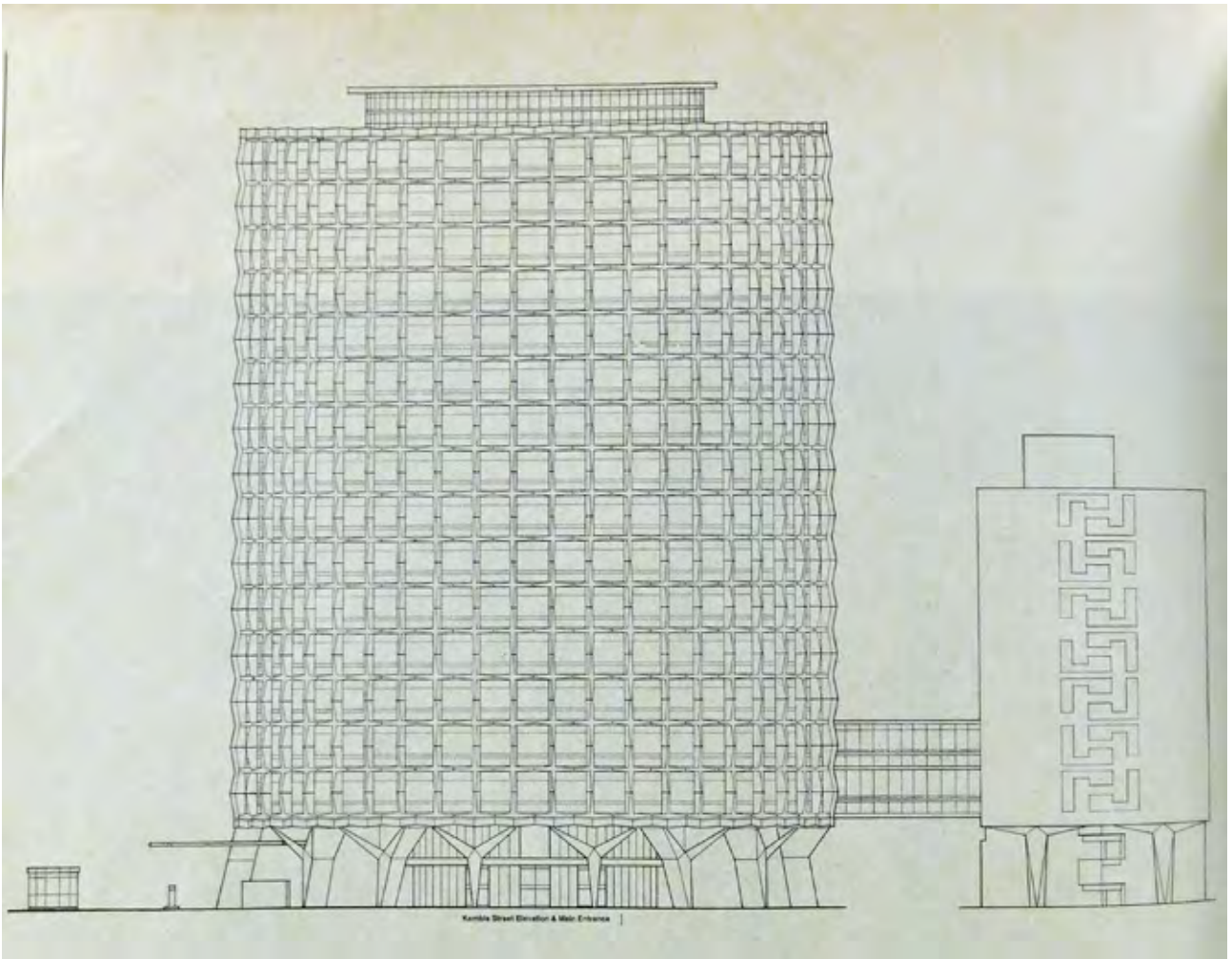
9A Drawing of precast cruciform for the tower block (Concrete Quarterly)



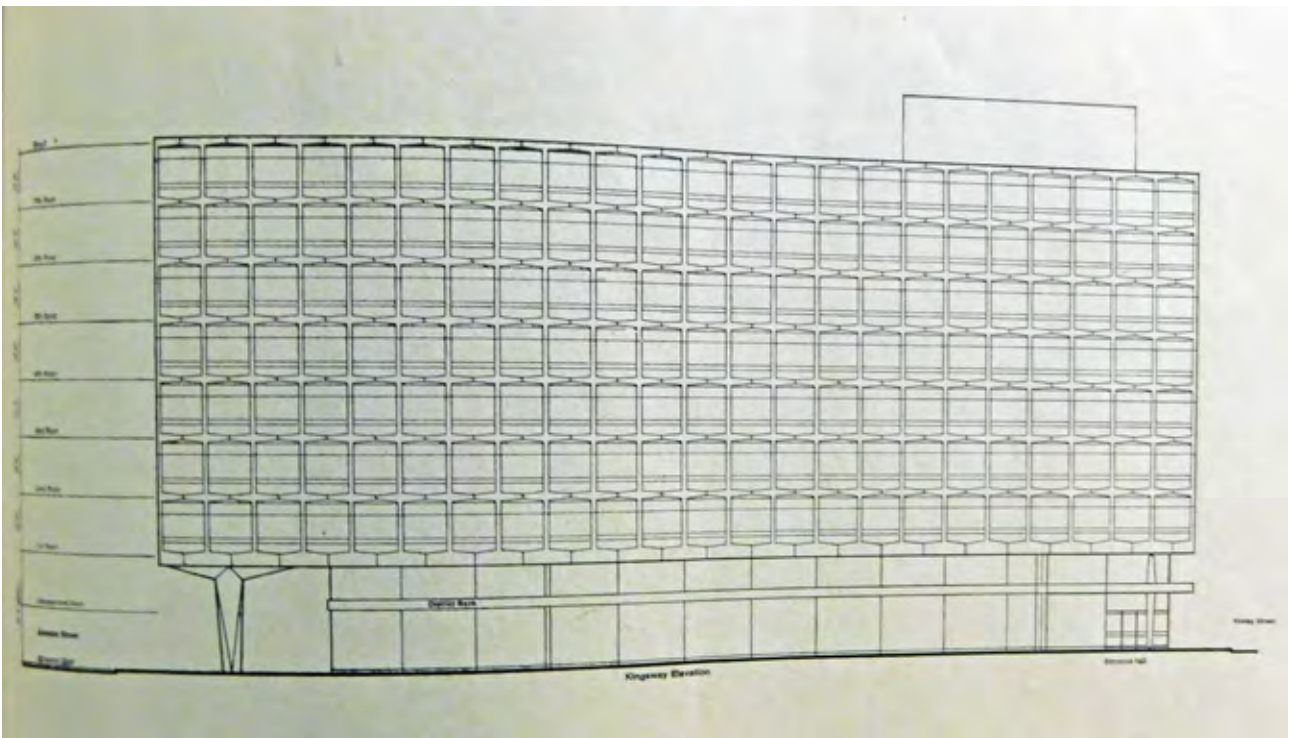
9B Precast concrete structural detail (Systems, Building and Design)



10 1964 plan showing layout of garage ramps, R. Seifert & Partners (Camden Archives)



11 Space House south elevation, 1968 (Systems, Building and Design)



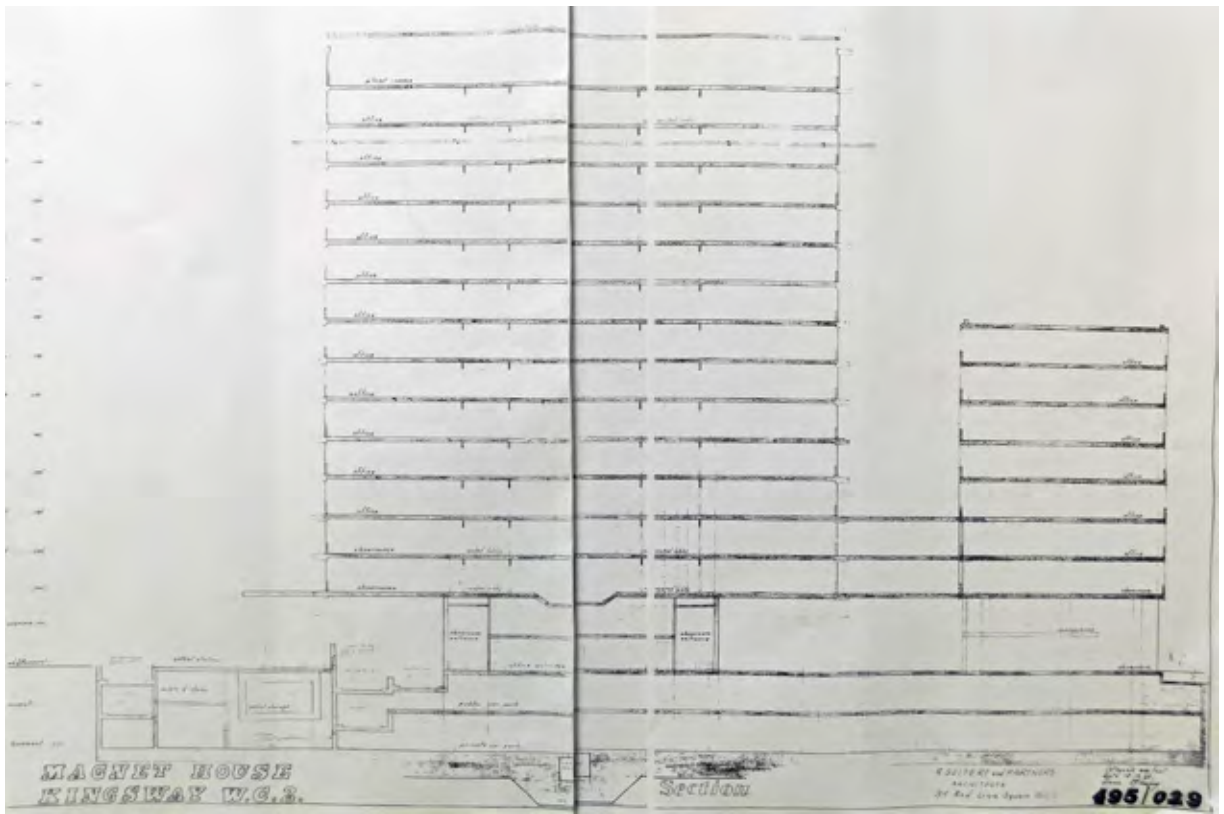
12 Kingsway block elevation, 1968 (Systems, Building and Design)

2.2.2 Original Plans

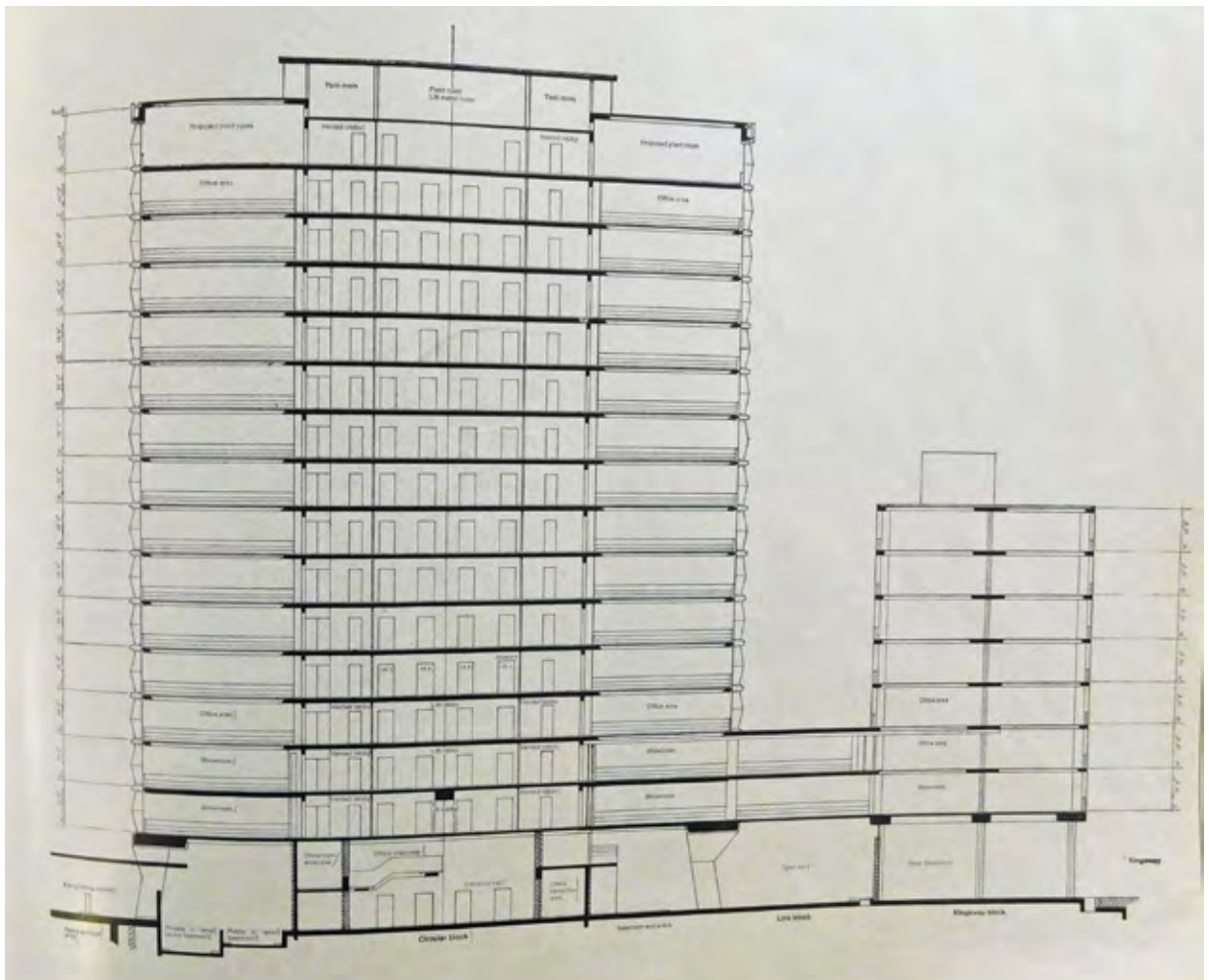
A set of original plans by Seifert and Partners dating to 1963 label the site as 'Magnet House', which suggests the historic name of the site was re-used before the completion of the building. A 1963 section drawing illustrates the use and largely open-plan layout of each floor **[plate 13]**. The Kingsway block featured a double-height ground floor showroom with a mezzanine inserted at the half-level, a showroom on the first floor, and flexible office space at the floors above. A two-storey bridge at the first and second floor linked to the taller tower, which also comprised showrooms on the lower floors and offices above, as well as a plant room level on the uppermost floor. A basement and sub-basement extended beneath the full width of both buildings and comprised a public car park at basement level with a private car park below. In addition, a petrol station was indicated to the rear of the tower, with a petrol storage chamber below ground. A section drawing included in the 1968 *Systems, Building and Design* feature illustrated what was ultimately constructed in more detail, including a central lift and services core rising to all floors, flanked by vented lobbies within the tower block and the central section to the top floor, which housed the lift overrun **[plate 14]**.

Sub-basement and basement plans from 1963 and 1964 respectively, show how the open plans of both floors extended beneath the full width of the block **[plates 15-16]**. An additional area for petrol storage was located in the western corner of the basement. Both floors were accessed via two lifts at the north end of the Kingsway block, stairs at the north and south ends of the Kingsway block and at points below the perimeter of the tower base.

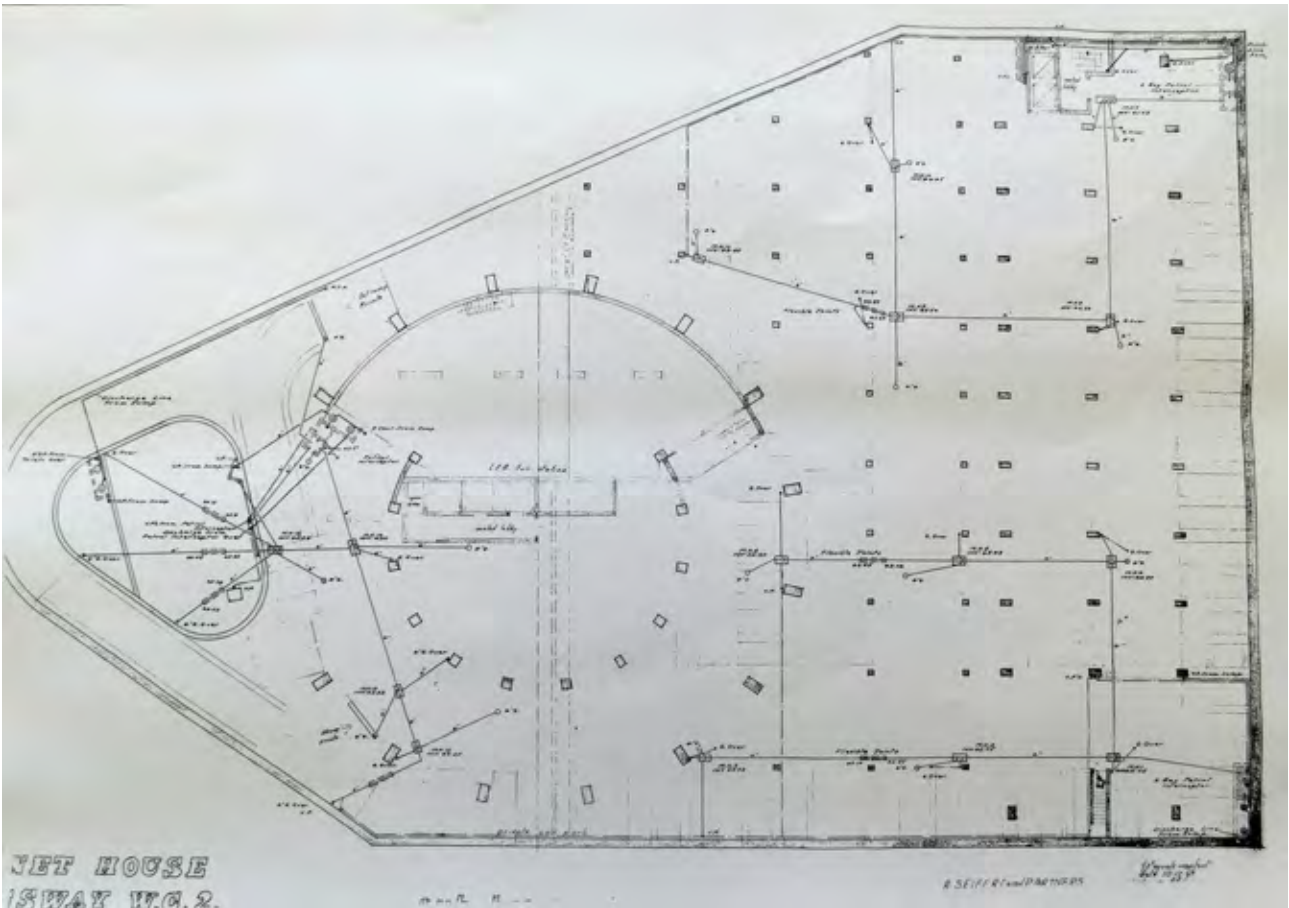
The location of the tower staircases are more legible in Seifert and Partners' 1964 ground floor plan, which show the stairs to the basement and the stairs to the showrooms and mezzanine above **[plate 17]**. Two additional flights of stairs led down from the forecourt of the basement around the inner curve of the garage exit ramp and closer to the tower between the two entrance ramps. The ground floor layout of the tower included three entrances into a central lobby and a separate double-door entrance to the left leading to stairs which followed the outer curve of the building up to a showroom level. The entrance lobby provided access to four lifts along the northern wall, with a small porter's office to the west and a refuse store and loading bay to the east of the lift core. A large plant area was located to the north of the entrance lobby comprising space for transformers and coolers. The Kingsway block was largely open plan for use as a showroom, though there was a separate retail unit at the southern end occupied by the District Bank. The showroom and retail units were accessed from shop frontages on Kingsway, while six sets of double-doors along the western elevation provided rear entrances and access to a services area. The main entrance to the offices was at the northern end of the block, slightly recessed from the street, which led into an office lobby with two lifts and a staircase leading up along the southern wall to the first floor. A separate staircase was also located at the northwestern corner, which was expressed externally. . A series of 1969 photographs of the District Bank by Colin Westwood provide more detailed views of the southern end of ground floor of the Kingsway block as built, including views of the southern entrance exterior and external stair, glazed front to Kingsway, interior arrangement and ceiling treatment **[plates 18A-E]**. Plans also included a mezzanine above the ground floor; in the tower block this comprised small offices and store rooms toward the centre, with an open plan around the perimeter **[plate 19]**.



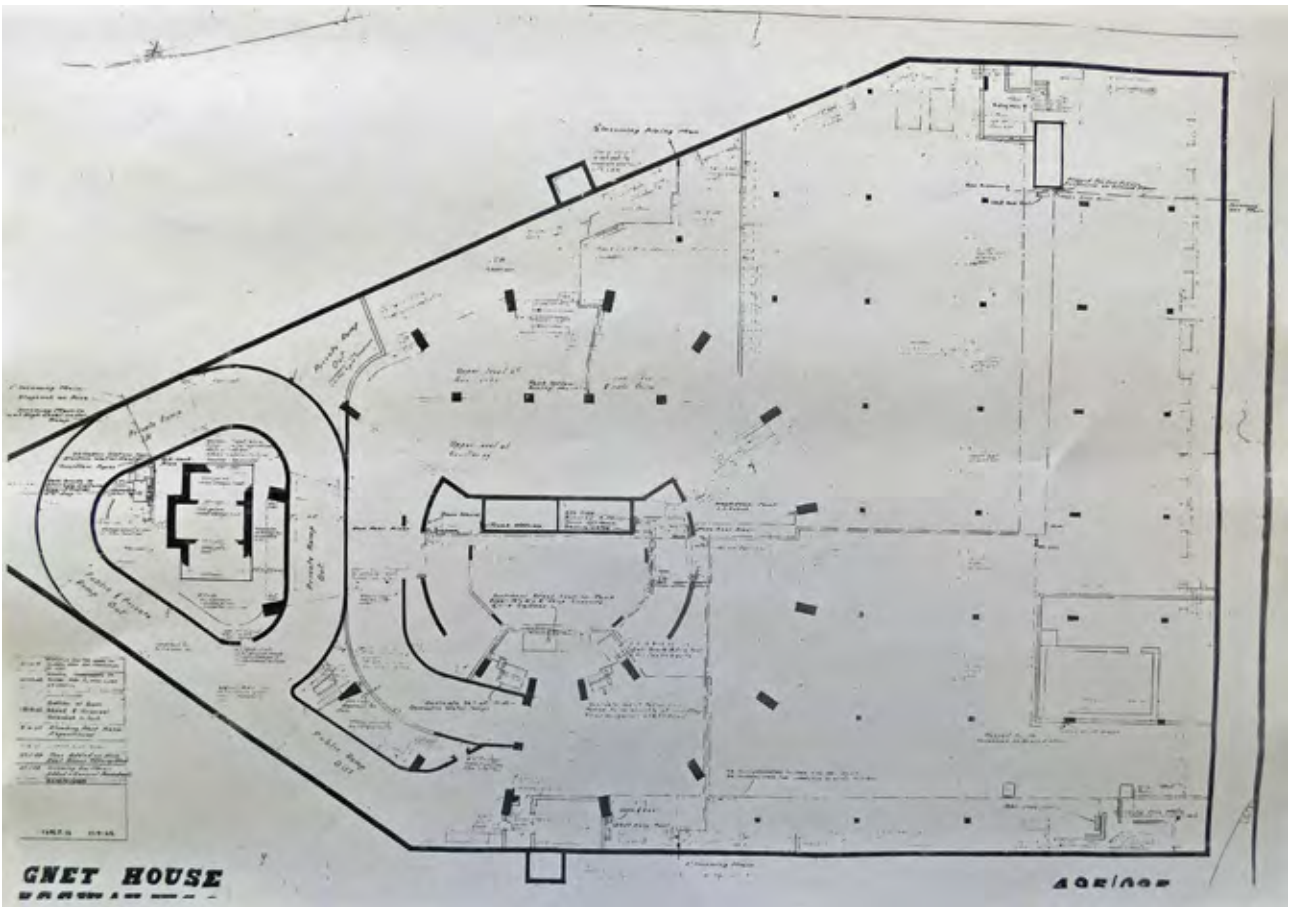
13 1963 section drawing, R. Seifert & Partners (Camden Archives)



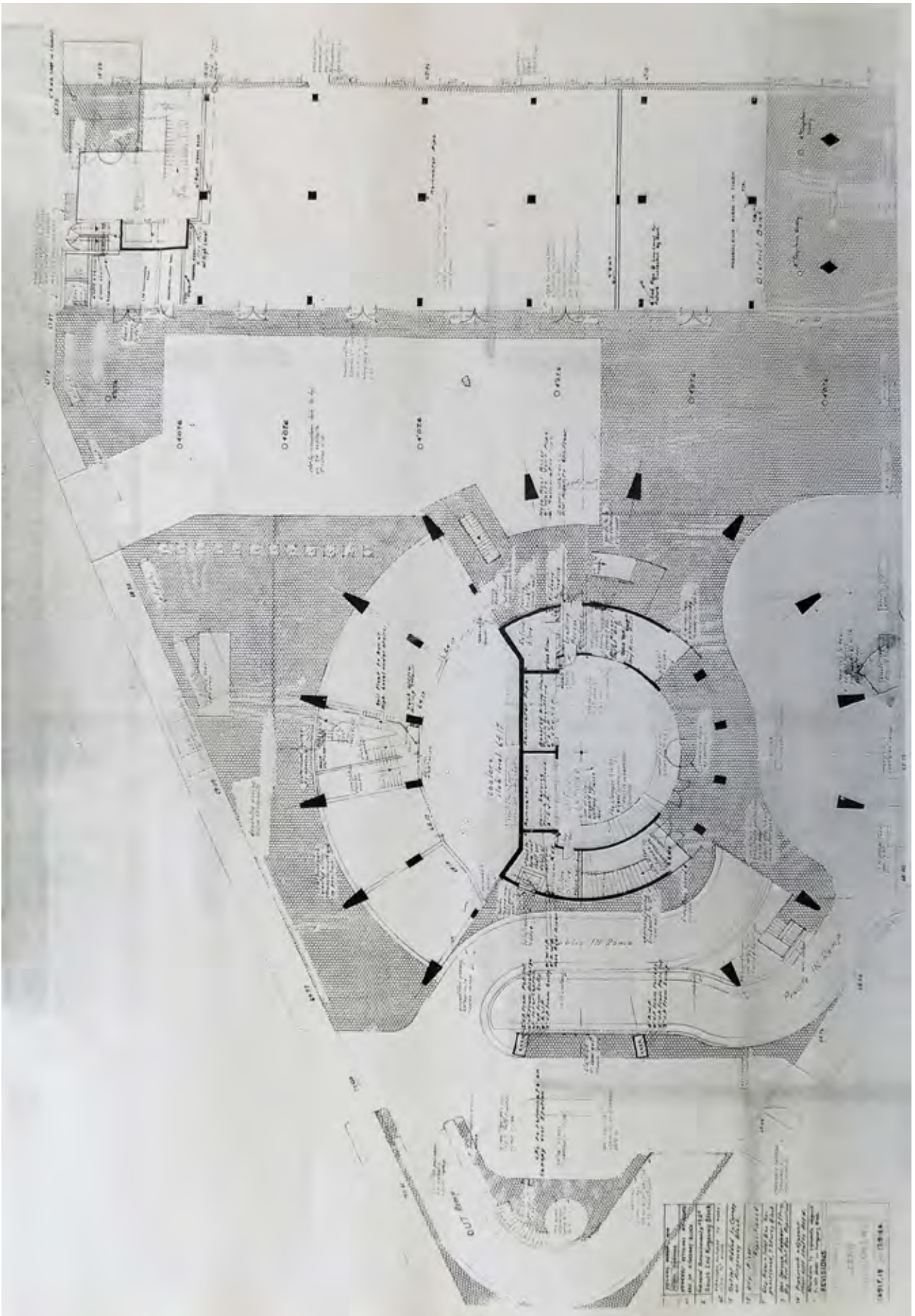
14 1968 section drawing (Systems, Building and Design)



15 1963 sub-basement plan, R. Seifert & Partners (Camden Archives)



16 1964 basement plan, R. Seifert & Partners (Camden Archives)



17 1964 ground floor plan, R. Seifert & Partners (Camden Archives)



18A 1969 photograph of Kingsway block, looking east (RIBA Photographs Collection)



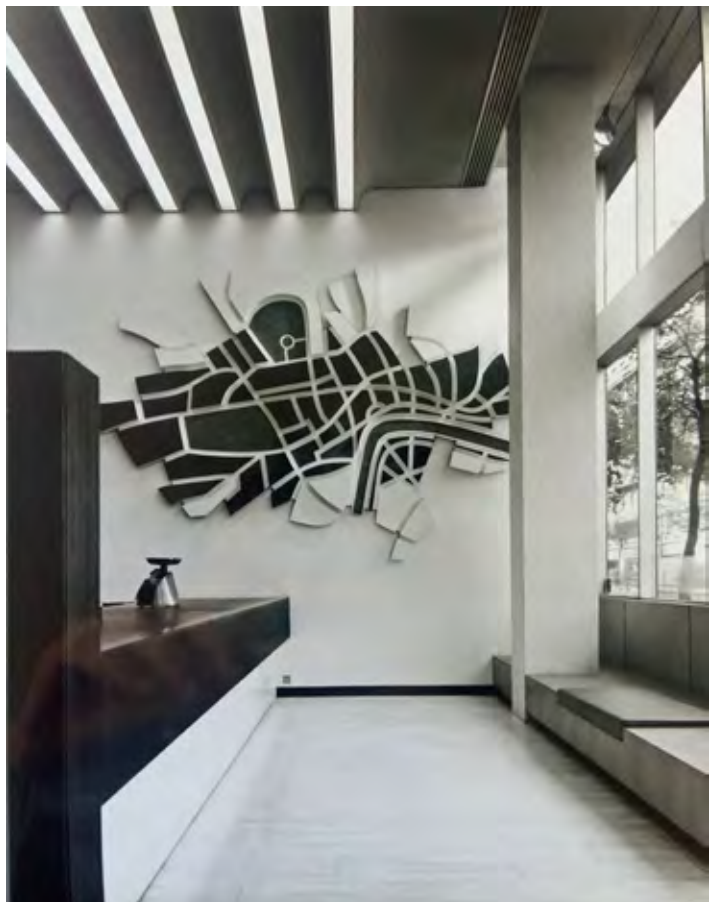
18B 1969 photograph of Kingsway block, looking west (RIBA Photographs Collection)



18C Kingsway block, ground floor elevation, 1969 (RIBA Photographs Collection)



18D 1969 District Bank interior, Kingsway block (RIBA Photographs Collection)



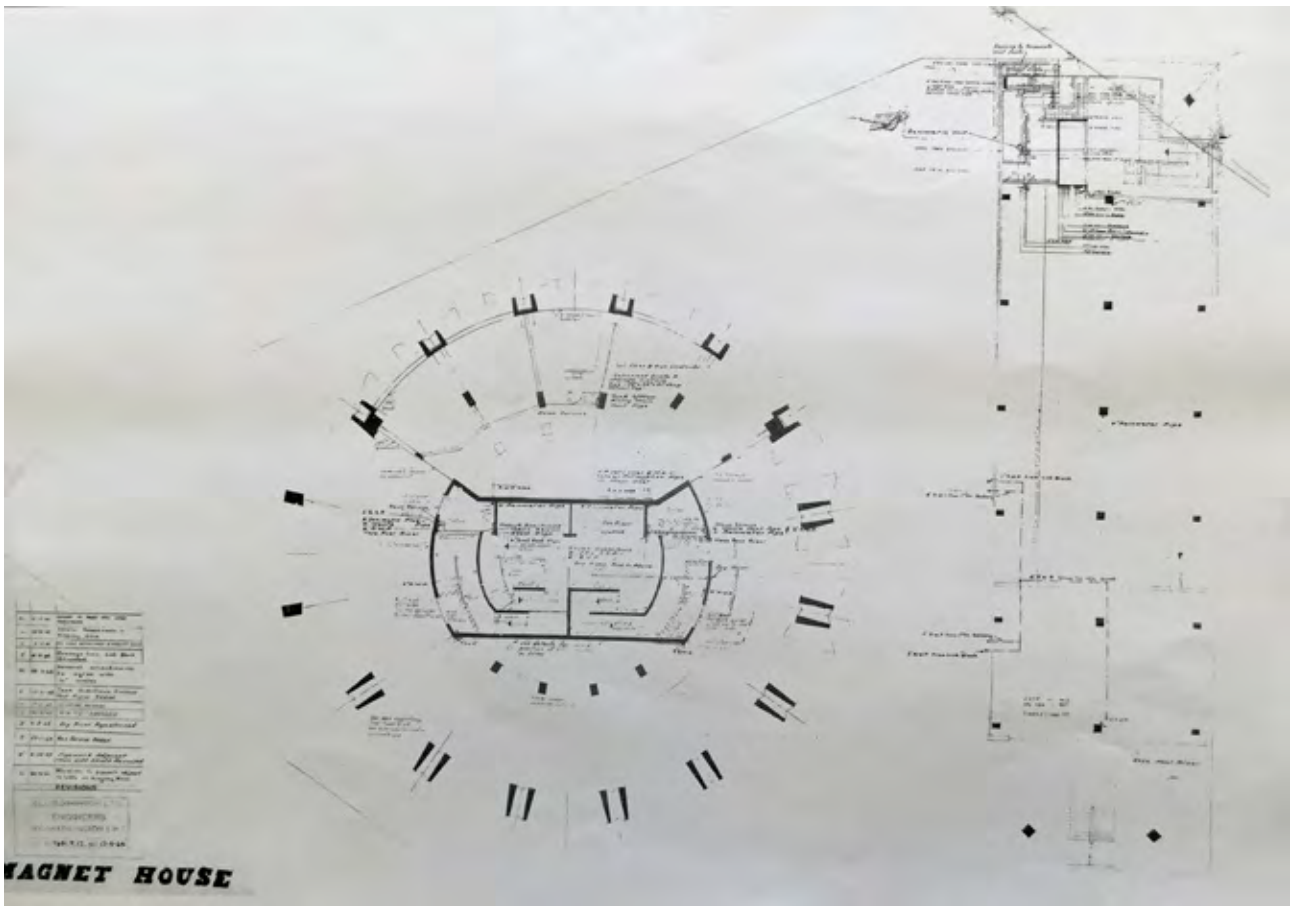
18E 1969 District Bank interior, Kingsway block, looking north (RIBA Photographs Collection)

The 1964 ground floor plan also provides some indication of the treatment of the forecourt and public realm around the site, which included decorative hexagonal paving laid on asphalt, rectangular pavement lights and smoke vents lining the perimeter of the site, the petrol pumps between the entrance and exit ramps to the west and a large grille over an open area to the north of the tower along Keeley Street **[plate 17]**. The intake and extractor units to the air conditioning system, the former at the junction of Keeley Street and Wild Street encased in a kidney-shaped enclosure clad in white mosaic, and the latter, further along Keeley Street concealed beneath a polygonal concrete bench are not marked on the plan, and must have been added during the course of construction.

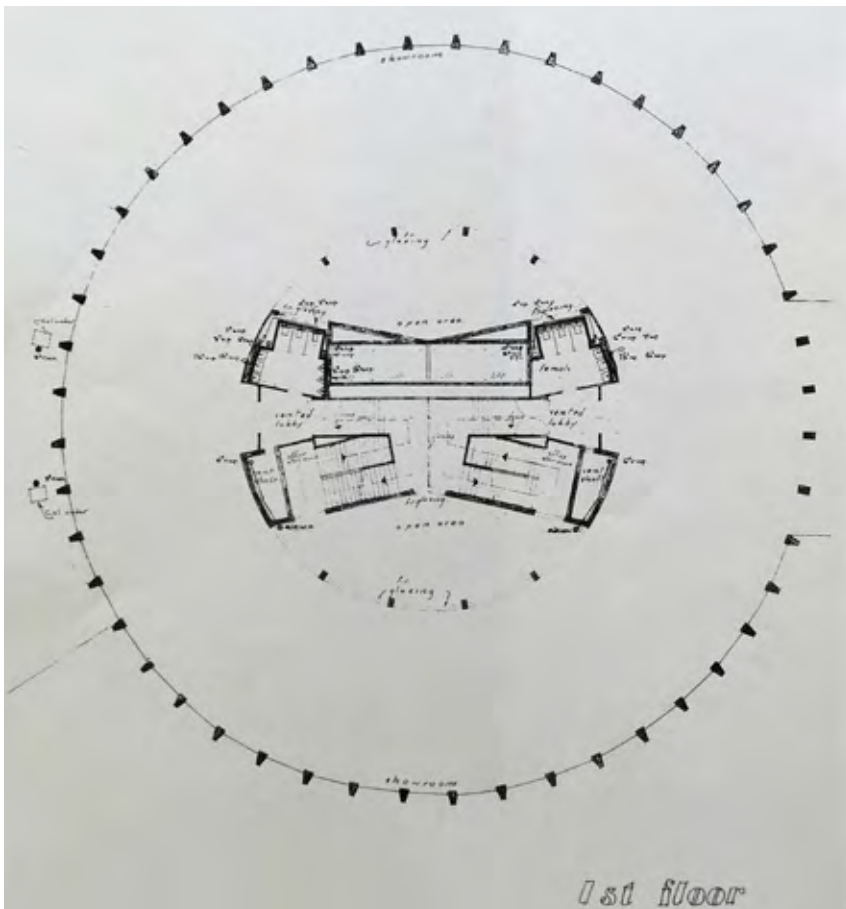
An early 1963 drawing of the first floor of the tower block by Seifert and Partners shows that the central core to the building was originally designed in a butterfly shape, comprising office stairs at angles to the south and a lift core to the north flanked by WCs **[plate 20]**. A 1964-6 plan illustrates the ultimate first floor design, which comprised fixed glazing to the curved outer walls and a central vented lobby flanked by two dog-leg staircases and a lift core **[plate 21]**. A narrow rectangular ventilation duct extended along the rear of the lift core to the substation below, as well as a cooling chamber with a flat roof over, while at the rear of the staircase there was a large ventilation duct flanked by two smaller shafts. The mixed mode ventilation ducts appear to have been inserted for cross-floor ventilation, with warmer air produced at the bottom of the duct which would rise to draw air through the floors from the outer windows, exiting at the top. The remainder of the floor was dedicated as showroom space, including the bridge link and Kingsway block **[plate 22]**. A similar plan continued in both buildings at the second floor, which was also in showroom use within the tower block and link bridge, but in office use in the Kingsway block **[plate 23]**. The upper floors continued in a similar fashion as open-plan offices, though without the link bridge connection. The Kingsway block ended at the seventh floor, with a large lift overrun and water tank compartment on the flat roof.

A 1964 plan of the ninth through fourteenth floors shows that this open office arrangement continued within the top half of the tower **[plate 24]**. Annotations provide some additional information regarding the original but largely utilitarian finishes, which included vinyl tile flooring to the lift lobbies, timber tile flooring to the offices, metal skirting, trunking plaster ceilings and aluminium windows. The fifteenth floor was dedicated as plant and storage space, including separate compartments around the perimeter for a boiler house, air conditioning plant, water tanks and a cooling tower, and rooflights were installed above each stairwell **[plate 25]**. Tank rooms were also located at either side of the enclosed central section of the roof, which had a large lift motor room at the centre **[plate 26]**.

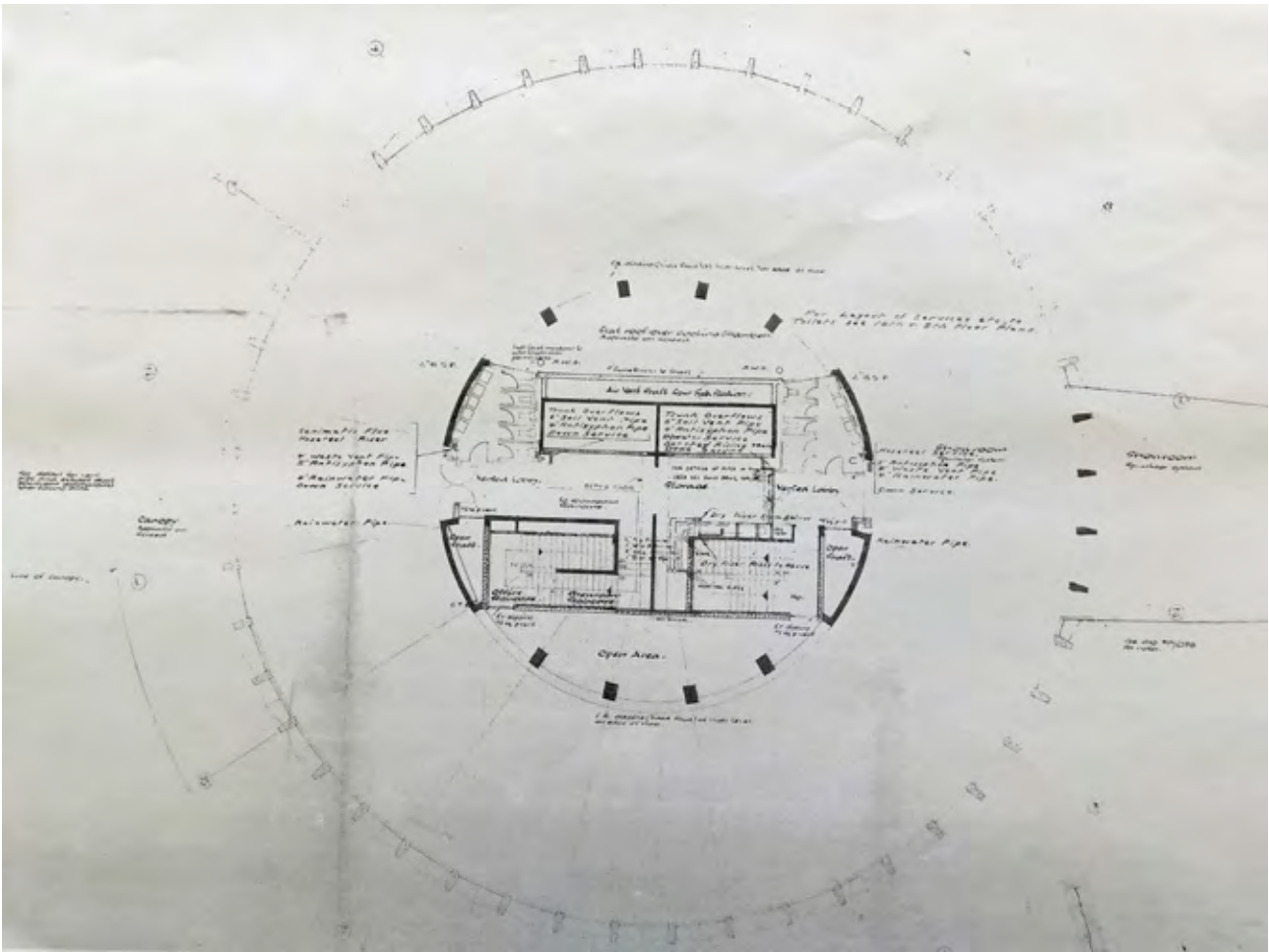
Photographs taken shortly after Space House was constructed illustrate the completed composition and provide an idea of the spatial relationship between the low and high-level components **[plate 27A]**, how the tower sat within the Victorian and Edwardian streetscape **[plates 27B-C]** and the impact of the tower block within the wider Holborn townscape **[plate 27D]**. The latter photograph, taken in 1972, also provides a view of the original roofline, including the original glazed observation deck set back on the roof of the tower and the plant room on the roof of the Kingsway block.



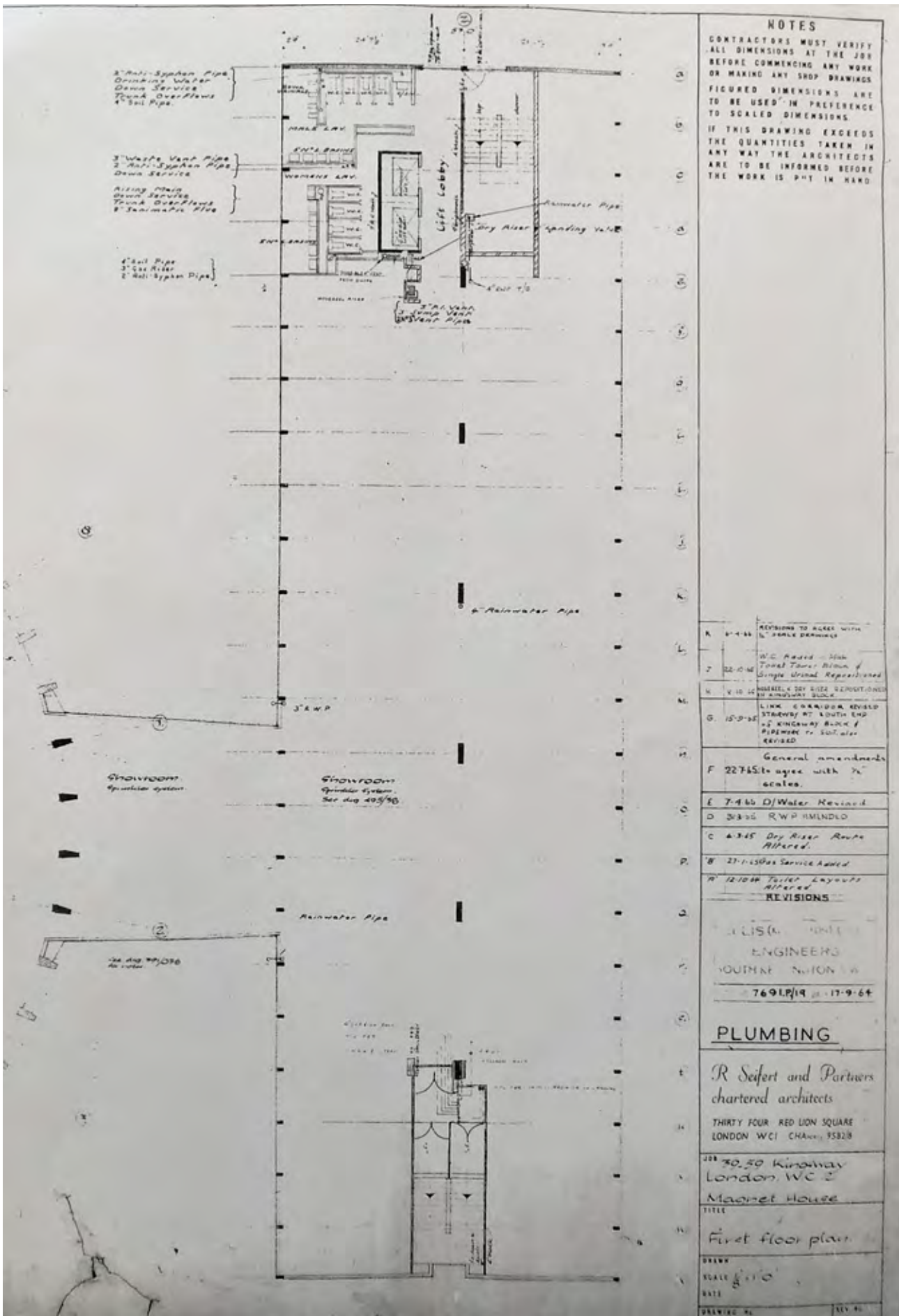
19 1964 mezzanine plan, R. Seifert & Partners (Camden Archives)



20 1963 initial first floor plan, R. Seifert & Partners (Camden Archives)



21 1964 first floor tower plan, R. Seifert & Partners (Camden Archives)



NOTES

CONTRACTORS MUST VERIFY ALL DIMENSIONS AT THE JOB BEFORE COMMENCING ANY WORK OR MAKING ANY SHOP DRAWINGS

FIGURED DIMENSIONS ARE TO BE USED IN PREFERENCE TO SCALED DIMENSIONS

IF THIS DRAWING EXCEEDS THE QUANTITIES TAKEN IN ANY WAY THE ARCHITECTS ARE TO BE INFORMED BEFORE THE WORK IS PUT IN HAND

A	8-4-66	REVISIONS TO ALICE WITH 1/4" SCALE DRAWINGS
Z	22-0-66	W.C. Heads - 2 each Toilet Tanks - 2 each Single Urinal Re-positioned
K	8-10-66	ROOFING, 4 DRY RISE REPOSITIONED TO KINGSWAY BLOCK
G	15-9-66	LINK & CHAMBER, REVISED STAIRS AT 4 DUTH END 2 KINGWAY BLOCK & PIPEWORK TO SUIT, also REVISED
F	22-7-65	General amendments to agree with 1/4" scales.
E	7-4-65	D/Water Revised
D	20-2-65	R/W R/W R/W
C	4-3-65	Dry Rise Route Altered.
B	27-1-65	Gas Service Added
R	12-10-64	Toilet Layouts Altered

REVISIONS

J. LISMAN
ENGINEERS
109 THE NORTON
7691/19 17-9-64

PLUMBING

R Seifert and Partners
Chartered architects

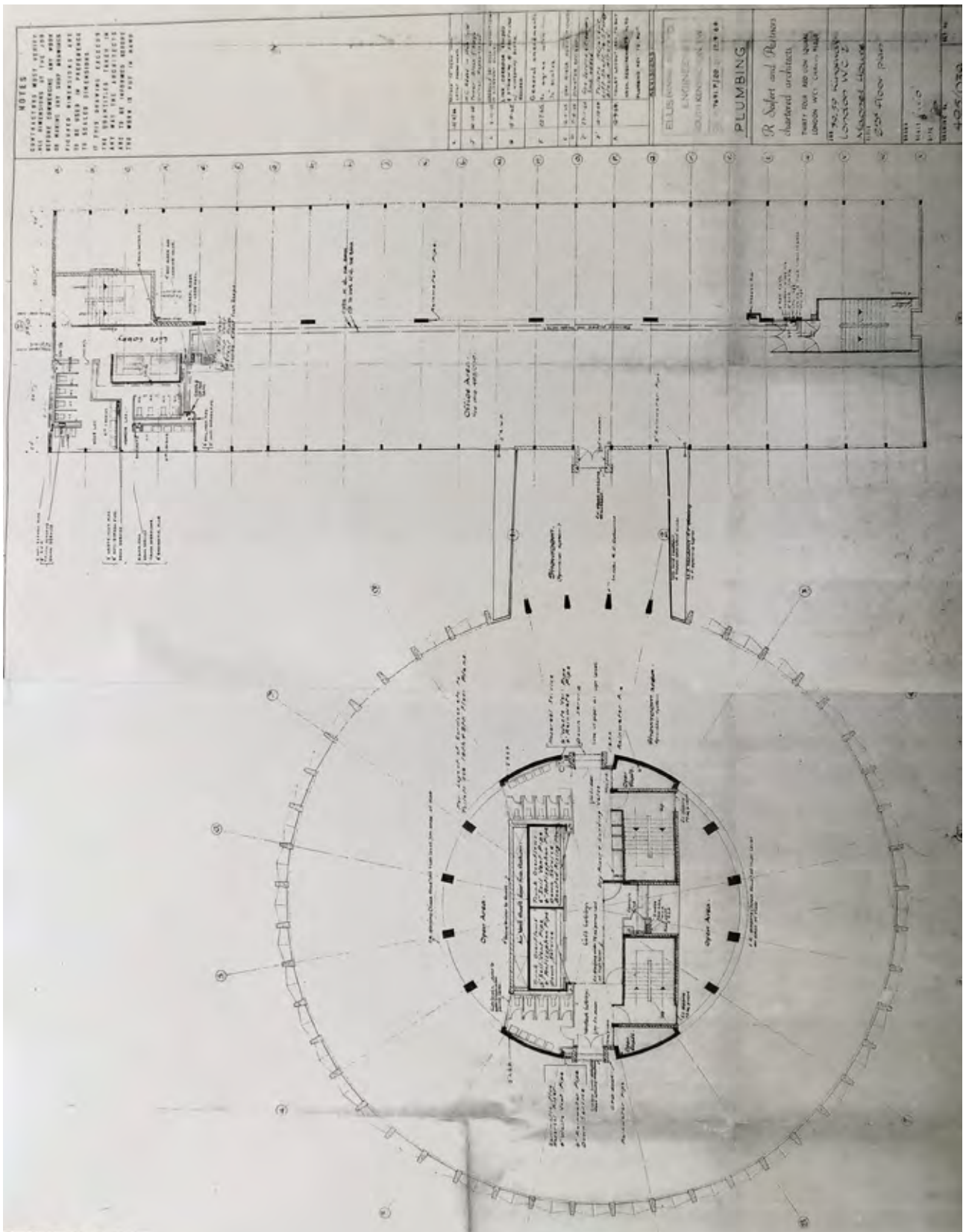
THIRTY FOUR RED LION SQUARE
LONDON WC1 CHANCERY, 95828

JOB NO. 30.50 Kingsway
London WC 2
Maquet House

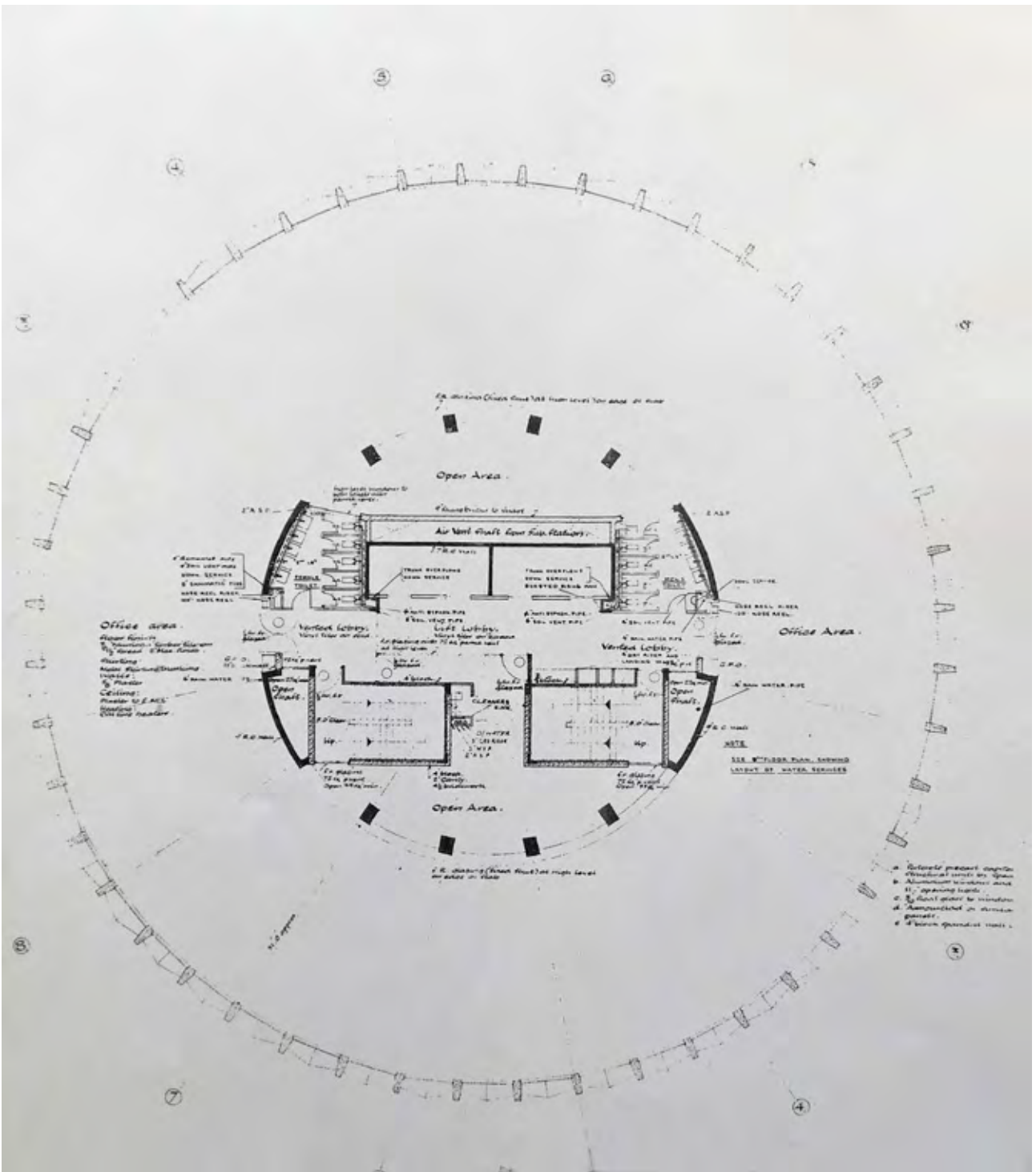
TITLE
First floor plan

DRAWN
SCALE 1/8" = 1'-0"
DATE
DRAWING NO. REV. NO.

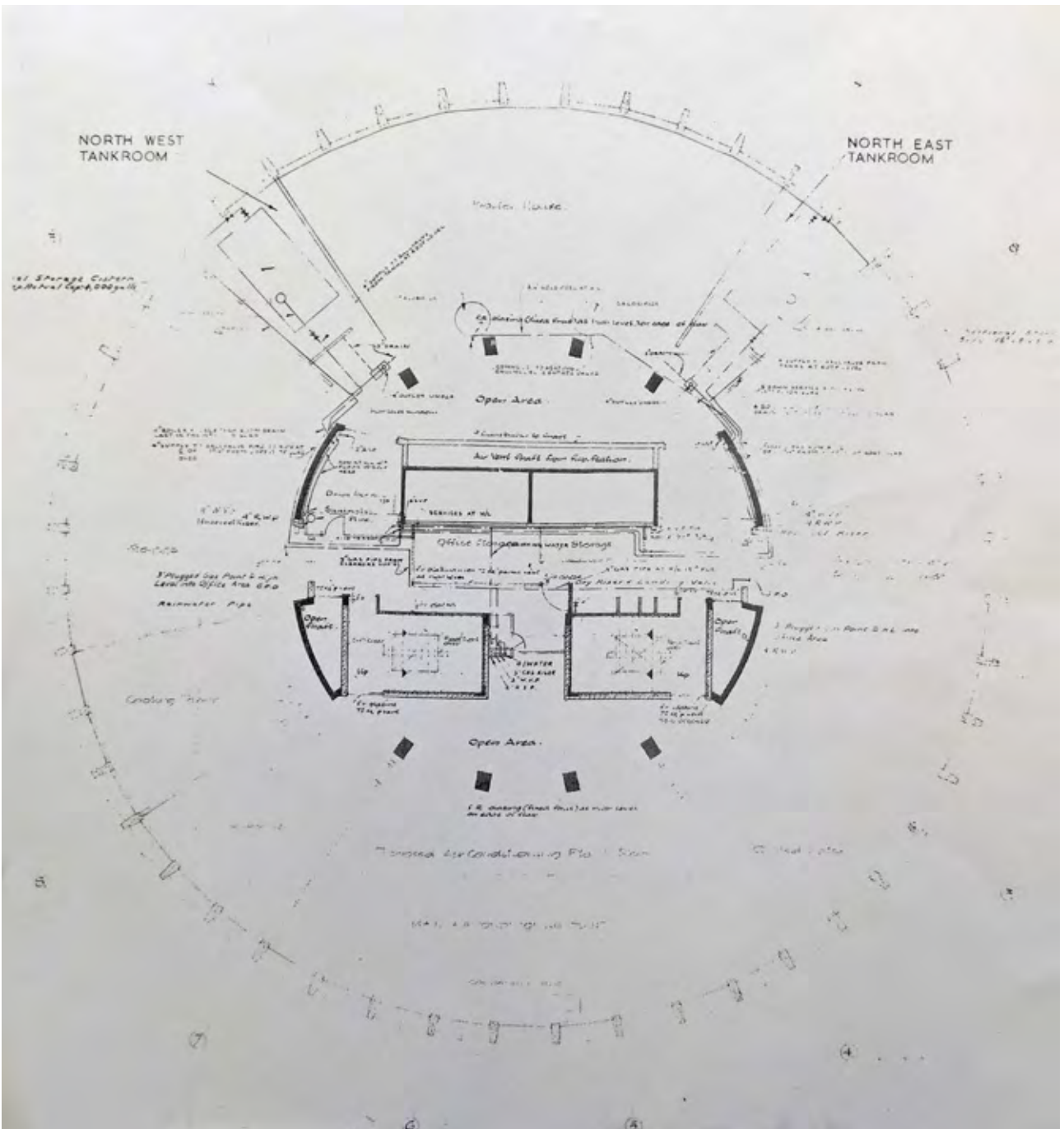
22 1964 first floor Kingsway block plan, R. Seifert & Partners (Camden Archives)



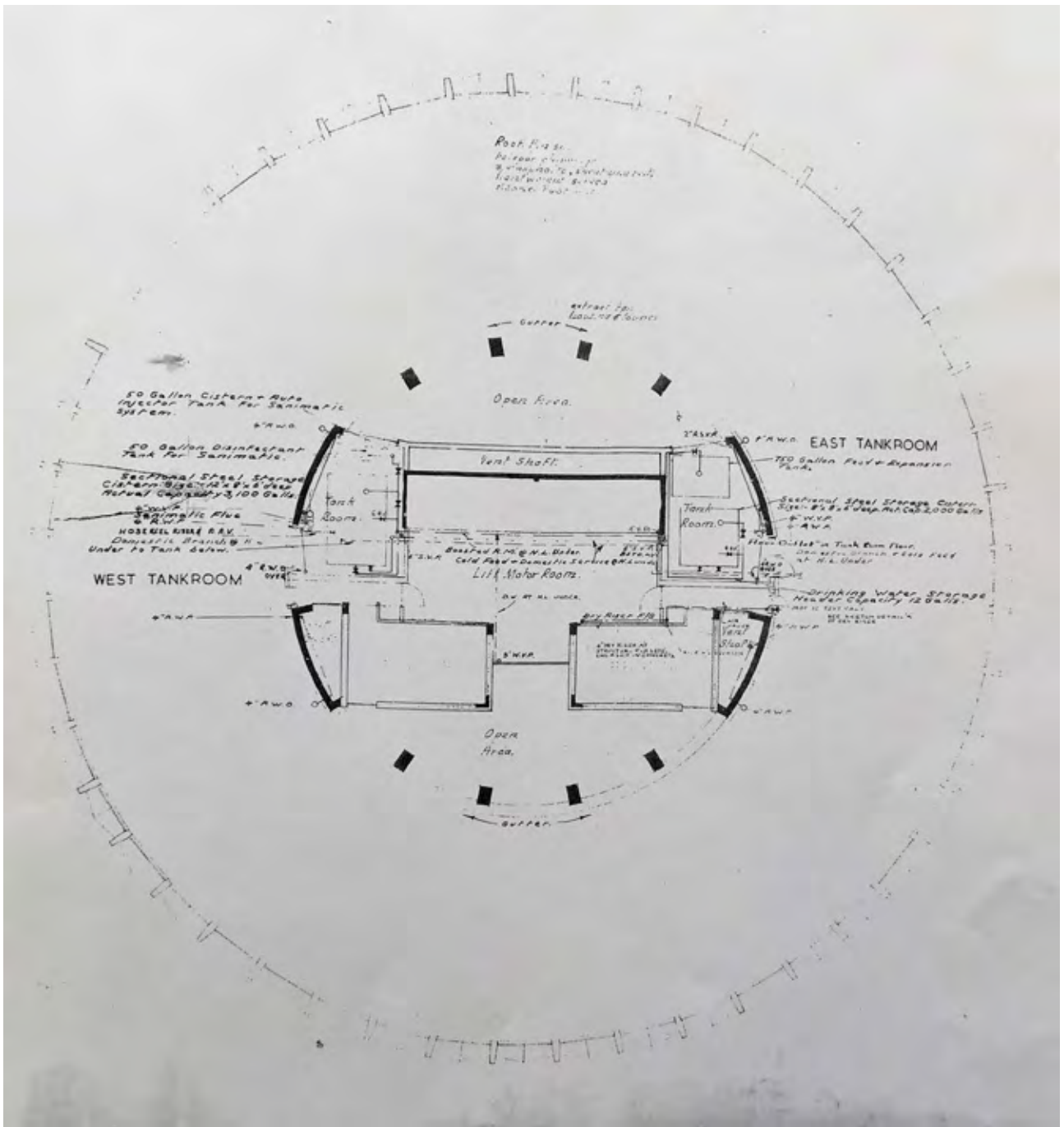
23 1964 second floor plan, R. Seifert & Partners (Camden Archives)



24 1964 typical ninth to fourteenth floor plan, R. Seifert & Problems (Camden Archives)



25 1964 fifteenth floor plan, R. Seifert & Partners (Camden Archives)



26 1964 tower roof plan, R. Seifert & Partners (Camden Archives)



27A Space House looking east, 1968 (RIBA Library)



27B View from beneath tower block, 1967 (Concrete Quarterly)



27C Space House view from Peabody House estate, 1967 (Concrete Quarterly)



27D Space House roofline, 1972 (RIBA Photograph Collections)

2.2.3 Later Alterations

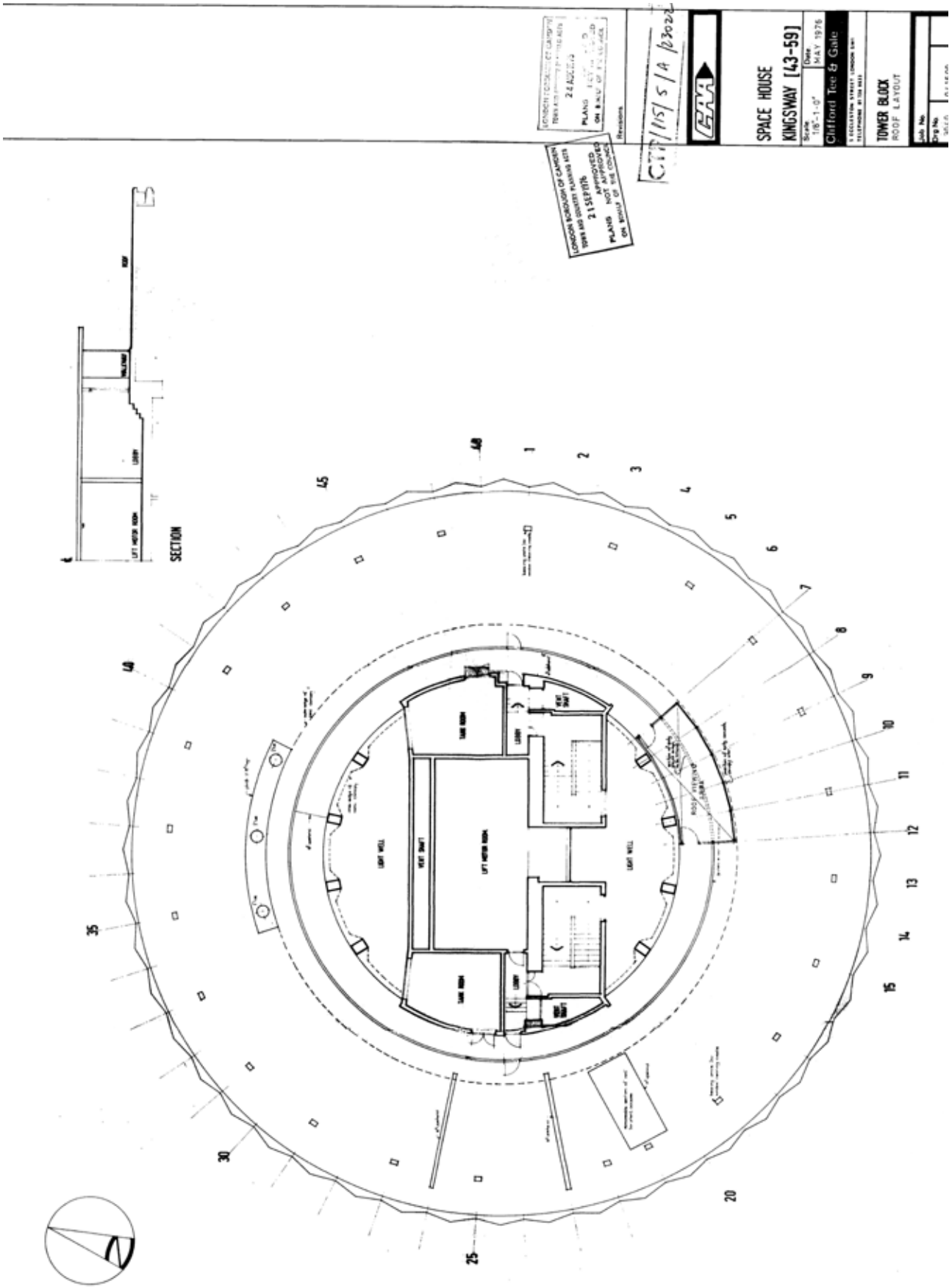
Despite the prominence of its design and central London location, Space House remained untenanted until 1975 due to apprehension arising from the use of high alumina cement within its pre-stressed beams and Y-shaped columns around the tower perimeter, which had cracked⁶ (the material was later banned from use in the UK due to strength concerns⁷). The Civil Aviation Authority (CAA) signed a 45-year lease for the site in 1975, but as a result of the perceived potential structural weaknesses of the building, it was agreed that the gross rateable value of Space House be reduced by the Lands Tribunal from £1,200,000 to £1,000,000 per annum. In addition, before the CAA could take up residence the buildings underwent a good deal of remedial works, including the replacement of the lugs securing the galvanised metal straps to 150 windows, the re-plastering of structural materials, the asphaltting of the roof and the addition of an external collar to the tower block to prevent further movement. At this time, the building was renamed Civil Aviation Authority House, CAA House for short.

Shortly thereafter, proposals were approved in 1976 for a roof viewing area within the glazed observation deck **[plates 28A-B]**. This comprised the removal of a section of the existing exterior glazed screen, the construction of a raised floor on concrete kerbs with a sisal carpet finish, and new full-height glazed panels set in steel frames. Planning records indicate that additional alterations made during the late-20th century principally comprised the substantial addition of plant and telecommunications equipment on the roof and throughout the buildings; the enclosure of the southern ground-floor staircase of the Kingsway block in the late-1980s; the enclosure of a ground-floor goods bay and fire escape; the addition of a service lift; alterations to Kemble Street and Kingsway entrances; and the addition of a security fence and security cabins to the rear forecourt in 1993-4.

Major refurbishments were executed in 1996 and 2003, including the remodelling of lobby areas to both buildings, the removal of the shop and bank units in the Kingsway block, and the replacement of the enclosure around the southern staircase of the Kingsway block with glazing. In 2000, proposals were approved for the addition of a new ground floor entrance and extension of the canopy at the northeastern corner of the Kingsway block. Accompanying plans show modern partitions in place at the ground floor, which had been converted into office use **[plate 29]**, while a 2005 existing plan of the first floor by Morey Smith illustrates how the original open-plan layouts of the upper floors of both blocks had been typically sub-divided by later partitions and furnishings **[plate 30]**.

6 Building Design, 1979, p. 39.

7 The Concrete Society, 2018.



28A 1976 roof walkway extension plan (Camden Planning)

23022/

Arch:
The drawings to be used in connection
with this contract are those of the
architect and shall prevail over any
other drawings or specifications.

ARCHITECT: CLIFFORD TEE & GALE
112, ST. MARK'S PLACE, LONDON, W.C.2.
PLANS: 1/4" = 1/8" (1/8" = 1/4")
ON 8/10/51

23022/1A



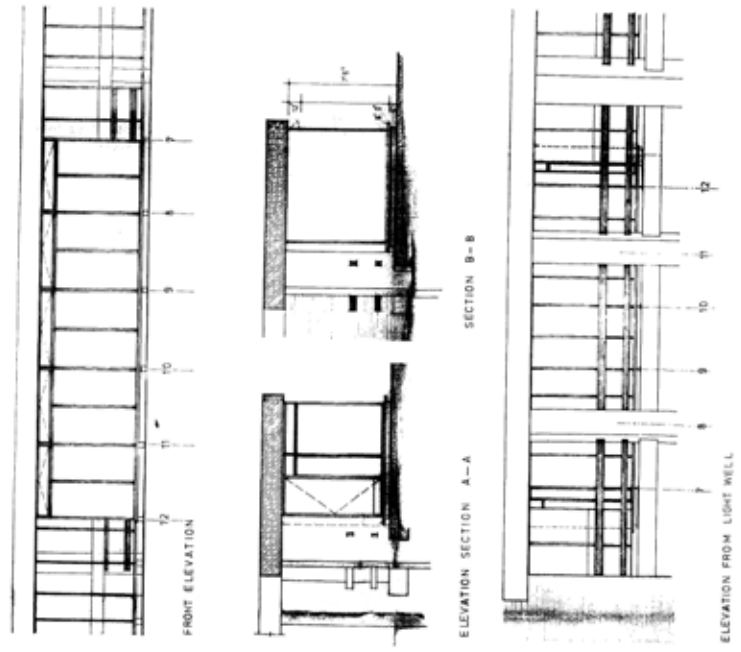
FRAGE HOUSE
42-53 KINGSWAY
LONDON
W.C.2.

Scale: 1/4" = 1/8" (1/8" = 1/4")
Date: March 1975

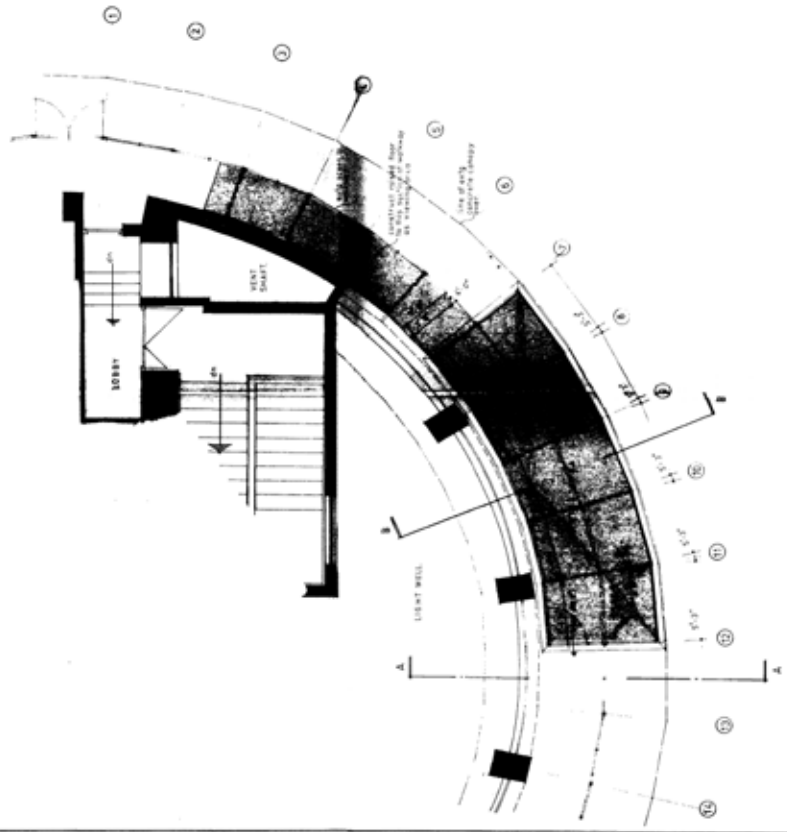
Clifford Tee & Gale
112, ST. MARK'S PLACE, LONDON, W.C.2.

TOWER BLOCK
ROOF VIEWING AREA

Job No.
3050
Drawing No.
0/1161

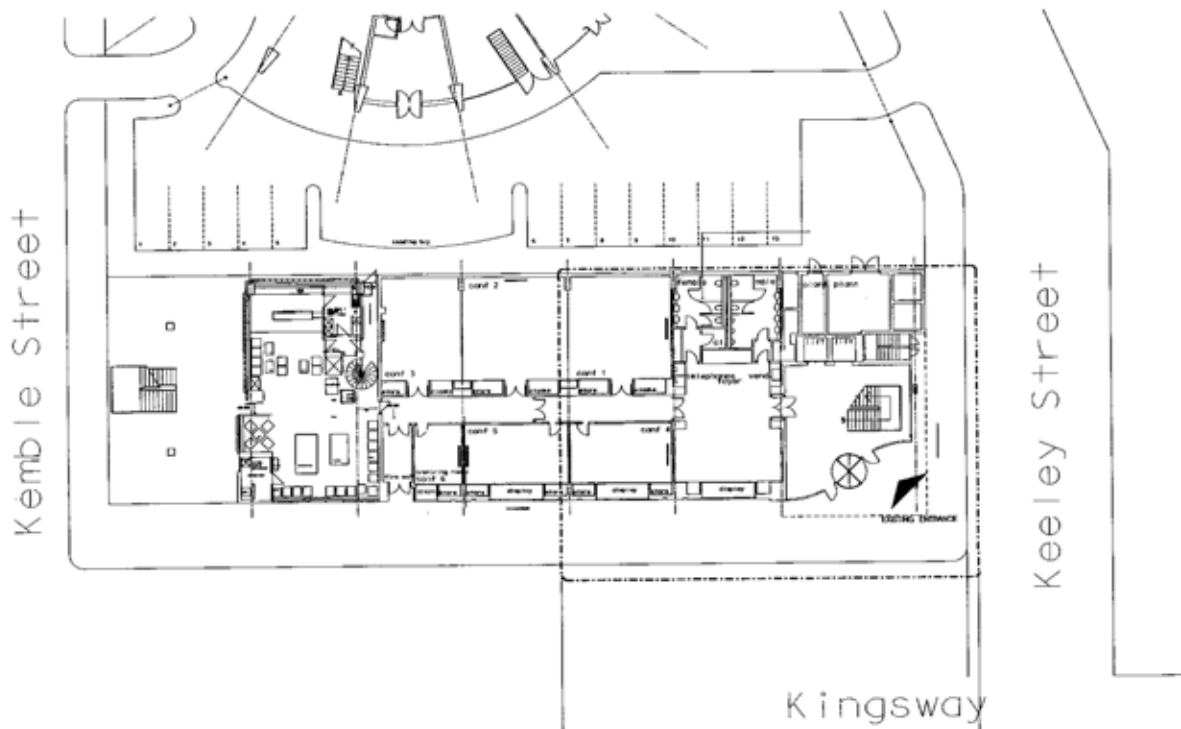


NOTE
 All framing for glazing to be 2x2x2
 timbers. The glazing to be fixed in a
 aluminium frame. The glazing to be
 fixed in a frame of glass type 1000
 Series and construction to be checked
 separately on site.



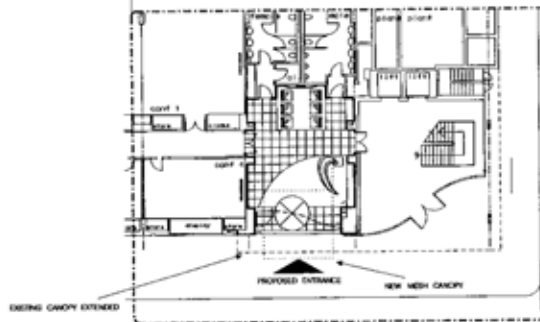
PART ROOF PLAN

28B 1976 roof extension elevations (Camden Planning)



EXISTING PLAN
Scale 1:100

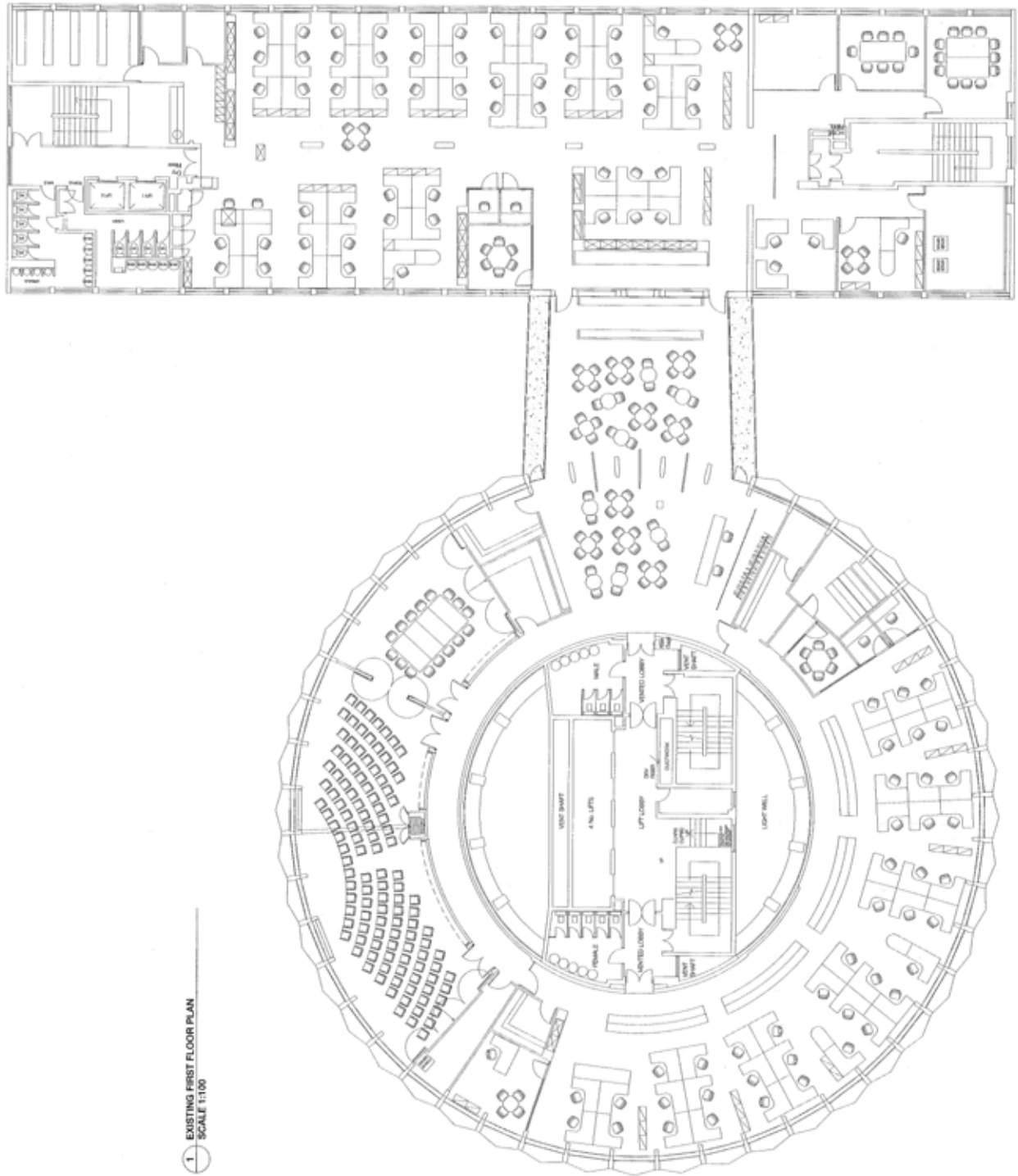
02



PROPOSED ENTRANCE
Scale 1:50

03

29 2000 proposals for new ground floor entrance, Kingsway block (Camden Planning)



1. EXISTING FIRST FLOOR PLAN
SCALE 1:100

NOTES
1. ALL DIMENSIONS TO BE CHECKED ON SITE

Project Name	45-49 Kingsway & 1 KIMBLE STREET LONDON WC2
Client	Camden Council
Architect	Camden Planning
Date	15/05/2005
Scale	1:100
Drawn by	Camden Council
Checked by	Camden Council
Project No.	15/05/2005
Sheet No.	1

FOR PLANNING
EXISTING FIRST FLOOR PLAN

30 2005 existing first floor plan (Camden Planning)

2.3 Planning History

The following history of relevant planning applications for 1 Kemble Street and 45-59 Kingsway has been extracted from the London Borough of Camden's online planning record.

2011/5945/P **03 April 2012** **Granted**

Installation of an air handling unit at roof level and associated equipment, including alterations to provide steel walkway and hand rails, pipework and relocated staircase in connection with existing office use (Class B1)

2006/4790/P **30 November 2006** **Granted**

Installation of 2 X 300 mm diameter transmission dishes and ancillary equipment at roof level to existing office building (Class B1)

2006/1083/P **15 May 2006** **Granted**

Installation of 8x transmission dishes (7x 300mm diameter and 1x 600mm diameter) and ancillary equipment at roof level to existing office building (Class B1)

2006/0345/P **03 March 2006** **No objection**

Replacement of existing 2 no. aluminium glazed louvres above second floor window and installation of 2 no. new louvres on the second floor western rear elevation of the building

2005/2573/P **15 July 2005** **No objection**

Display of externally illuminated signage to entrance on Kemble Street

2005/1752/P **22 June 2005** **Granted**

Replacement of metal and glass fanlights with aluminium panels to rear elevation and replacement of temporary timber panels and balcony door to the bridge link

2005/1019/P **08 June 2005** **No objection**

The installation of new condenser units and extension of existing flues at 16th floor roof level; the installation of a louvre screen at ground floor level; and the display of entrance signage

PSX0004569 **25 July 2000** **Granted**

The installation of telecommunications antennae and equipment cabin

PSX0004091 **14 March 2000** **Granted**

New entrance and extended canopy on Kingsway frontage

PSX0004090 **14 March 2000** **Granted**

New goods entrance on west elevation of Kingsway block

PS9904177 **15 April 1999** **Granted**

Installation of telecommunications antennae, equipment cabin and ancillary equipment

PS9904162 **01 April 1999** **Granted**

Enclosure of the fire escape stair at south end of the building near Kemble Street

PS9804897	12 November 1998	Granted	The installation of telecommunication apparatus on roof
PS9804436	26 June 1998	Granted	Installation of telecommunications equipment on the roof
PS9804136	29 May 1998	Granted	Installation of new goods lift
PS9705187R1	17 April 1998	Granted	Enclosure of external fire escape
PS9704257	08 May 1997	Granted	Replacement of window with new glazed disabled access door
PS9704066	20 March 1997	Granted	Installation of comfort cooling and fresh air ventilation equipment on roof of building
9501646	27 October 1995	Granted	Alterations to entrances on Kemble Street and Kingsway
9501177	18 August 1995	Granted	Installation of attenuators to existing chiller units and erection of acoustic screening
9400038	11 February 1994	Granted	Erection of 2 security cabins on forecourt
9301369	12 October 1993	Granted	Erection of security fence and gates to garage forecourt area
9300754	08 October 1993	Granted	Construction of a goods bay enclosure at ground level under the existing building structure
9300020	04 March 1993	Granted	Installation of air cooling liquid chiller and construction of galvanised walkway plus related alterations on roof of Kingsway block
9201220	04 February 1993	Granted	Change of use of the ground floor of the Kingsway block from office and library only to Class B1 business use as described in the Town and Country Planning (Use Classes) Order 1987 including ancillary conference/meeting rooms
9100723	24 September 1991	Granted	The extension of existing chiller units on the roof of CAA House tower block
8800461	07 December 1988	Granted	Alterations to provide further glazing to external staircase at CAA House

8800026 **05 May 1988** **Granted**

Installation of rooftop cellular radio base station

8700896 **22 July 1987** **Granted**

The installation of 12 air conditioning condenser units on roof of round tower block CAA House

27680 **06 February 1979** **Granted**

The use of the vacant ground floor showroom as a car showroom

23022 **24 September 1976** **Granted**

The extension of the existing walkway at roof level to form a viewing platform

21386 **08 January 1976** **Granted - Conditional**

Change of use of the first floor of the rectangular block, the first and second floors of the tower block and the bridges connecting the two buildings from showrooms to offices and ancillary uses for the Civil Aviation Authority, including a Medical Centre, Meeting Rooms, Staff Recreation Facilities, an internal telephone exchange and telex facilities

32344 **12 February 1965** **Granted**

Erection of a building of sub-basement, basement, ground floor, and part 7 and part 14 storeys over, for use as car park in sub-basement and basement, showrooms on the ground and first floors, showrooms and offices on the second floor and offices on the third to fourteenth floors

2.4 The Architects

Horace George Marsh, Architect (1921-1988)

Horace George Marsh was born on 10 March 1921 in Birmingham. He studied as an apprentice in the Birmingham firm of Bradley & Clarke from 1936 until 1941 before formally attending the Birmingham School of Architecture. He then took a position with the office of H.W. Weedon and Partners, leading Birmingham architects, before ultimately pursuing work in London in 1946. After a year working with R. Jelinek-Karl he joined the practice of Sir John Burnet, Tait and Partners; Gordon Tait proposed his admittance to the RIBA in March 1956. He left the practice the following year for that of Richard Seifert, who made Marsh a founding partner of the newly-formed R. Seifert and Partners in 1958. Marsh worked as a senior partner there until 1970.⁸

Marsh brought a fresh, Modernist aesthetic to Seifert's practice, more strongly influenced by the likes of Le Corbusier, Oscar Niemeyer and American practice Skidmore Owings and Merrill, and was the practice's leading designer during the 1960s and early 1970s. The result can be seen in a number of his significant buildings, including the Grade II-listed Centre Point (1963-66, listed Grade II in 1995); Alpha Tower (1970-2, listed Grade II in 2014); and Space House (1964-8, Grade II listed in 2015); and Tolworth Tower in Kingston (1963). The home he designed for himself at 29A Loom Lane, Hertfordshire (1962-5) was also Grade II-listed in 1999. Marsh retired from architecture in 1986, and died in October 1988.⁹

Richard Seifert, Architect (1910-2001)

Born Reuben (later known as Robin or Ruben, then Richard) Seifert into a Swiss family that subsequently moved to London, Seifert was one of ten children of a cinema manager. He was schooled at the Central Foundation School in the City of London and won a scholarship to the Bartlett School of Architecture in 1927 where he studied under Albert Richardson and graduated in 1933. After an architectural and surveyor apprenticeship, Seifert set up his own practice in 1934 in a basement room in Hanover Square; he started with shop fronts, conversions and other small commissions, and 'failed miserably trying to make a living',¹⁰ before beginning to work on more profitable housing developments of traditional appearance, mostly in north-west London. In 1934 he became an Associate of the RIBA and in 1942 a Fellow.

Seifert served in India and Burma with the Royal Engineers during the Second World War. He rose to the rank of Lieutenant Colonel, and was often referred to after the war as Col. Seifert, a title he carried with pride. After the war Seifert started to receive commercial commissions, including a large factory building for Rival Lamps in 1947, and in 1956, a new store for Woolworths in Marylebone Road which he designed in a neo-classical style.

Seifert's trademark architecture were striking tall office blocks, residential and hotel towers with bold geometrically patterned or sculpted elevations, inspired by the architecture of Oscar Niemeyer. He began designing in this vein with a series of London commissions: Tolworth House, a 22-storey office building on the Kingston bypass in Surbiton opened in 1964; Space House, off Kingsway, one of Seifert's most memorable buildings with a

8 'Horace George Marsh' in *The Dictionary of Scottish Architects*, 2016.

9 Alpha Birmingham, 2016, online.

10 Richard Seifert quoted in: *Sunday Times*, 13 February 1972.

geometrically structured elevation on a circular plan, was completed in 1962; Centre Point, the tallest building in London when it was finished in 1963, marked the intersection of Oxford Street and Tottenham Court Road with a precast, concrete-framed, fin-shaped tower of thirty-six storeys. Seifert was adamant that these striking, patterned designs, whilst criticized by contemporaries, and derogatively named 'pop architecture' by Erno Goldfinger, befitted London: 'Nine months of the year we have grey skies. The light is poor and we lack shadow. I think that a sculpted building creates shadow. And this is absolutely essential. Architecturally it has greater strength about it than a glass building'.¹¹ Most of these 'pop' buildings were designed by Seifert's partner in business, George Marsh, who had joined the firm in 1957.

Seifert was notorious for his immense business acumen, his close relationships with speculative property developers, and his great skill at interpreting and finding loopholes in laws and regulations that allowed his practice to build big commercial buildings at unusually large plot ratios, often in sensitive locations. Seifert was himself critical of the low quality of much of the commercial architecture of the 1950s, and called it a 'regrettable period', but felt that the 1960s were a better period when good architecture was being built.¹² Whilst most of the building that the practice designed after the war were office developments, part of their oeuvre included hotels, and in London these were the Royal Garden Hotel, Kensington (his first London hotel); the Britannia Hotel, Grosvenor Square; the Penta (later called the London Forum, then Kensington Forum) and the Park Tower Hotel in Knightsbridge. Seifert had respect for the task of designing hotels, noting 'hotels are really little towns. An office block is a Meccano set compared to a hotel'.¹³

During his fifty years in practice, celebrated in 1984 with an exhibition by the RIBA, Seifert built, as was remarked at the time, more London buildings than Sir Christopher Wren, and had undeniably the greatest effect of any post-war architect on the city's skyline. His oeuvre in Britain and Europe consisted of over 3,000 schemes, including more than 500 office buildings, and in 1969 his practice had 300 employees. He retired in 1985.

11 Ibid.

12 Ibid.

13 Ibid.

2.5 Sources and Bibliography

London Metropolitan Archives

GLC Photographs Collection
Maps Collection
Plans (Building Act Case Files)

Camden Local Studies and Archives Centre

Original Plans

Camden Planning Archives

Building Case File
Redevelopment Drawings

RIBA Library

Richard Seifert, biographical file

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'Rates reduced due to design defects' in *Building Design*. No. 434. 23 February 1979.
Richardson, V. February 2006. 'Lost in Space House' in *Blueprint*. No. 239.
'Space House Kingsway London' in *Concrete Quarterly*. July-September 1967.
Weinreb, B., Hibbert, C. Keay, J. and Keay, J. (eds.). 2008. *The London Encyclopaedia*. London: Macmillan.

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'Horace George Marsh'. 2016. *The Dictionary of Scottish Architects*. The Concrete Society. *Question on High Alumina Cement (HAC)*. Accessed June 2018. Online <<http://www.concrete.org.uk/fingertips-nuggets.asp?cmd=display&id=687>>.

3.0 Site Survey Descriptions

3.1 The Setting of the Site and the Metropolitan and Conservation Area Context

3.1.1 The Wider Setting

In addition to a small range of buildings along the eastern side of Southampton Row, the Kingsway Conservation Area comprises the narrow stretch of buildings flanking either side of Kingsway from High Holborn in the north to Kemble Street in the south, after which the street continues southward into Westminster. Only the Kingsway slab block of the Space House site falls within the conservation area, though the tower is visible in street views **[marked in red in plates 31A-C]**. Kingsway is recognised for its early-20th century commercial architecture and robust, neo-Classical frontages **[plate 32]**. As most of the buildings were constructed during the relatively short period between 1900 and 1922, the elevations lend an air of consistency, almost all in Portland stone with elaborate detailing, and most six to eight storeys in height. The rooflines of Kingsway vary however, in an array of mansards, dormers, attic storeys, turrets and parapet details; these are revealed in glimpses between mature foliage **[plate 33]**. The street's four lanes funnel traffic north into Holborn and south into Aldwych and the Strand, and though Kingsway is lively with both vehicle and pedestrian activity, the rows of trees which flank the street contribute to a leafy streetscape.

The tower is also visible in views from the west as it emerges prominently above the largely six and seven-storey townscape along Kemble Street and Russell Street toward Covent Garden **[marked in red in plates 34A-D]**. The impact of the proposed scheme on conservation area, metropolitan and London views is analysed in Section 4.0.



31A CAA House tower visible from Kingsway (marked in red) (Insall)



31B CAA House tower visible from Kingsway (Insall)



31C CAA House tower visible from Kingsway (marked in red) (Insall)



32 Kingsway, looking south (Insall)



33 Kingsway looking north (Insall)



34A CAA House visible from west (marked in red) (Insall)



34B CAA House tower visible from west (marked in red) (Insall)



34C CAA House tower visible from west (marked in red) (Insall)



34D CAA House tower visible from west (marked in red) (Insall)

3.1.2 The Immediate Setting

Only Space House and the Peacock Theatre to the southeast break from the Edwardian Kingsway streetscape as mid-20th century insertions. The character changes in the area to the rear of the Space House buildings, which is not in a conservation area. A mix of modern seven-storey office and educational buildings overlook the site from the north side of Keeley Street, while a range of six-storey Victorian apartment blocks in yellow brick which form part of the Peabody Estate are situated opposite in Wild Street. The estate continues west down the north side of Kemble Street, which is lined by late-19th and early-20th century offices and housing along its southern side. A few small trees dot Wild Street, otherwise the area is largely devoid of greenery. The scale of the Space House tower block affords substantial contrast to its surroundings at 17 storeys in height, and it is visible in a number of views. The sculptural treatment of its cylindrical elevation also draws the eye upward and provides a sense of texture and light within the somewhat bland townscape to the west. At ground level however, this is diminished by the presence of conspicuous modern and detracting railings and bollards, and a forecourt cluttered with plant, a security booth, modern glazed partitions and enclosures, a bin store and narrow strip of car park between the Kingsway and tower blocks [plates 35A-D].



35A Modern railings to rear of site (Insall)



35B Modern railings and bollards to forecourt (Insall)



35C Rear parking area within forecourt (Insall)



35D Present bin store in forecourt (Insall)

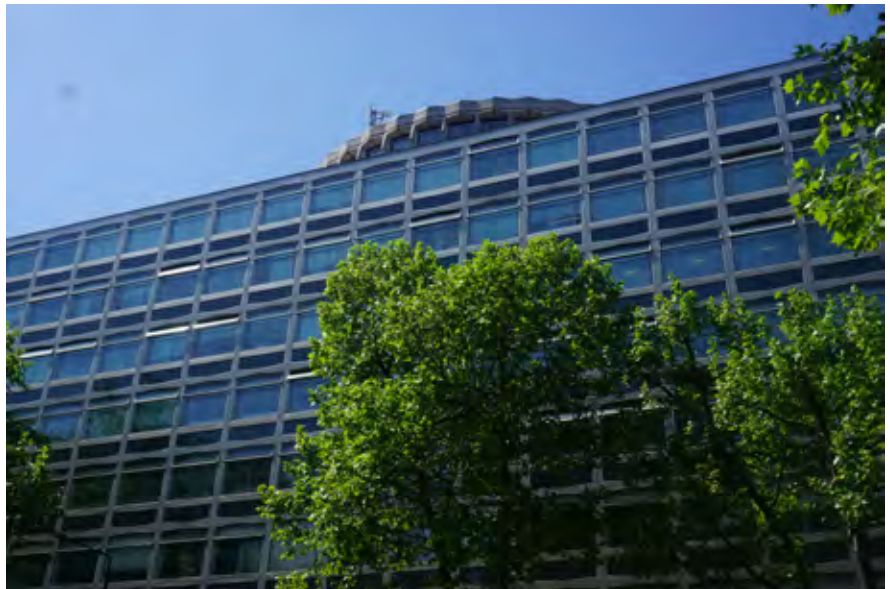
3.2 The Kingsway Block: 43-59 Kingsway

3.2.1 Front Elevation

The principal elevation to Kingsway rises eight storeys in polished granite over a curtain-walled frontage of 22 bays of original, aluminium-frame windows. At the upper floors windows are flush, with spandrel panels in dark opaque glass set below each window **[plate 36]**. The ground floor is recessed, with broad display windows set within polished metal surrounds; these are later infills of original shopfronts and are of no significance **[plate 37]**. The glazed staircase enclosure to the south is also a modern addition which obscures the view of original tapered concrete pilotis and staircase, and this detracts from the significance of the building. The north end has also been altered at the ground floor with modern curved glazing panels and the extension of the original canopy.

3.2.2 Rear Elevation

The rear elevation also comprises eight storeys in polished granite over 22 bays of aluminium-frame windows, but is bisected by a two-storey bridge link connecting the tower block at the first and second floors **[plate 37]**. As at the principal elevation, windows are flush, with spandrel panels in dark opaque glass. Most windows comprise a narrow casement panel at the top; to the north these have been replaced with detracting metal vents. The north end of the ground floor is constructed of dark brick, inset with a number of unattractive modern vents. Most of the original doorways from the rear of the retail units have been in-filled with matching brick, though the concrete lintels remain. The south end comprises double-height metal and glazed panels arranged in narrow vertical strips around the former external stair. Modern plant projects at the centre of the roofline, which detracts from the appearance and significance of the building.



36A Principal elevation fenestration, Kingsway block (Insall)



36B Principal elevation ground floor, Kingsway block (Insall)



37 Kingsway block rear elevation (Insall)

3.2.3 Side Elevations

Both side elevations rise eight storeys, and are also faced in polished gray granite at the upper floors **[plate 38]**. Original aluminium-frame windows comprising fixed and casement units light stairwells at either end of the building, set behind elegant granite block patterns with a Greek-key effect visible from Kingsway. The northern return elevation comprises modern glazed panels to the ground floor entrance lobby set behind original pilotis in polished white concrete which are bisected by a dark, flat canopy **[plate 39]**. A span of original vertical glazed panels remain to the rear of the modern glass at the ground floor, with original aluminium double doors and an enclosure in dark brick and white mosaic tile. The ground floor area to the south side was originally open, with the projecting slab supported by tapered pilotis in polished concrete mirroring those beneath the tower to the west; this has been awkwardly infilled by a modern glazed staircase enclosure presently used for advertising, ruining the effect of the pilotis and obscuring views of the ground floor elevation **[plates 40A-B]**.

The elevations of the bridge link connecting the two buildings comprise two storeys of recessed aluminium windows between granite slabs, set back behind balustrades with transparent panels which form narrow galleries to each side. A metal handrail is visible at the roofline **[plate 41]**.

3.2.4 Roof

Flat asphalt roof with large lift overrun enclosure and modern plant. Not inspected at time of site survey.



38 Kingsway block side elevation, upper floors (Insall)



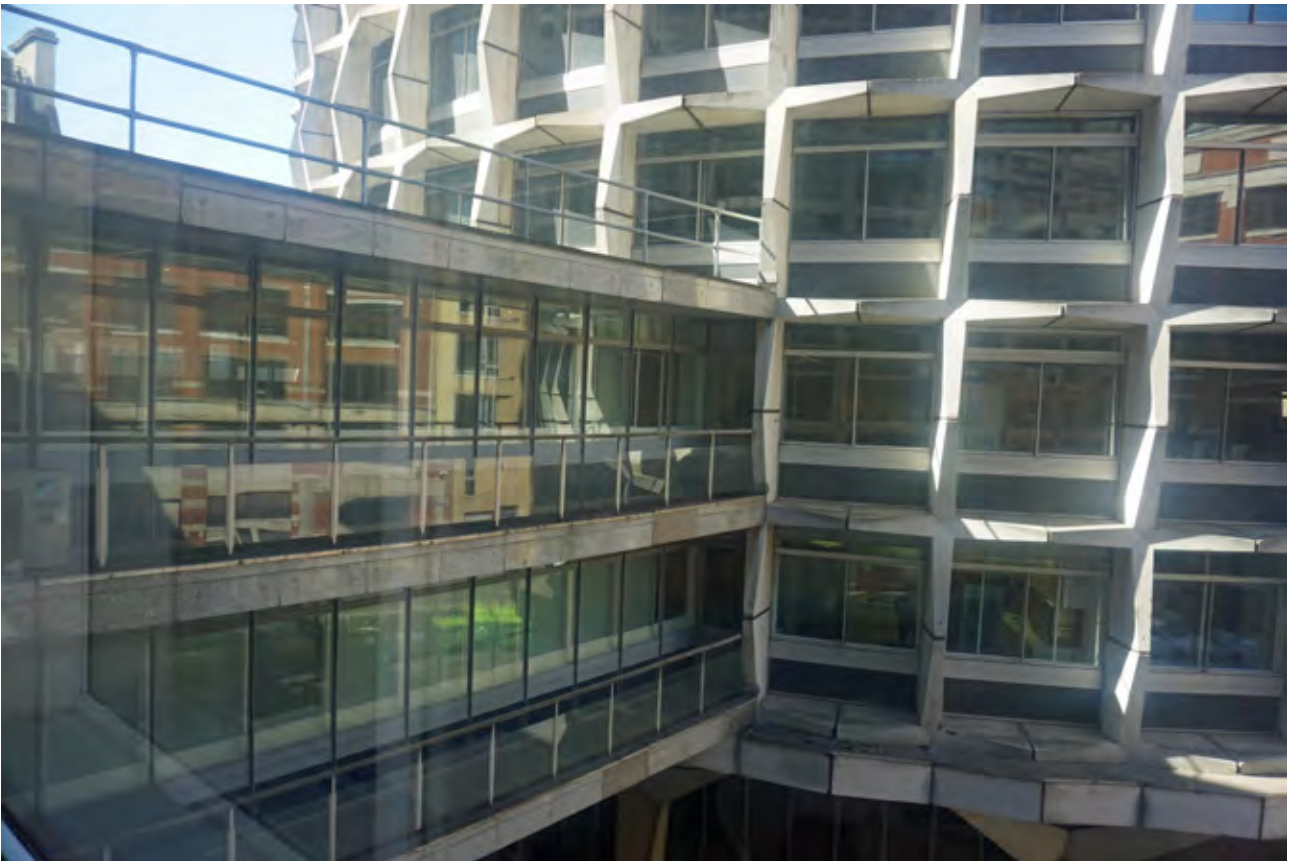
39 Kingsway block north return elevation, ground floor canopy and glazing (Insall)



40A Kingsway block southern return elevation (Insall)



40B Kingsway block southern return elevation, ground floor (Insall)



41 Bridge link elevation (Insall)

3.2.5 Interior

The interiors of the Kingsway block largely comprise open-plan offices, though these have been obscured at some levels by an array of modern partitions. The foyer at the northern end was completely refurbished and enlarged in 1996, though some original panels in black marble with an original inscription naming the architects and builder remain to the southern wall **[plate 42]**. The open stair in mosaic tile and polished concrete treads to the south and once an exterior feature is also original, though has been obscured by a detracting modern glazed enclosure **[plates 43A-B]**. Secondary staircases and their doors **[plates 44A-B]** and aluminium-frame windows are mostly original, but the interiors have otherwise been heavily modernised and are of no significance.



42 Original black marble panels, Kingsway block north foyer (Insall)



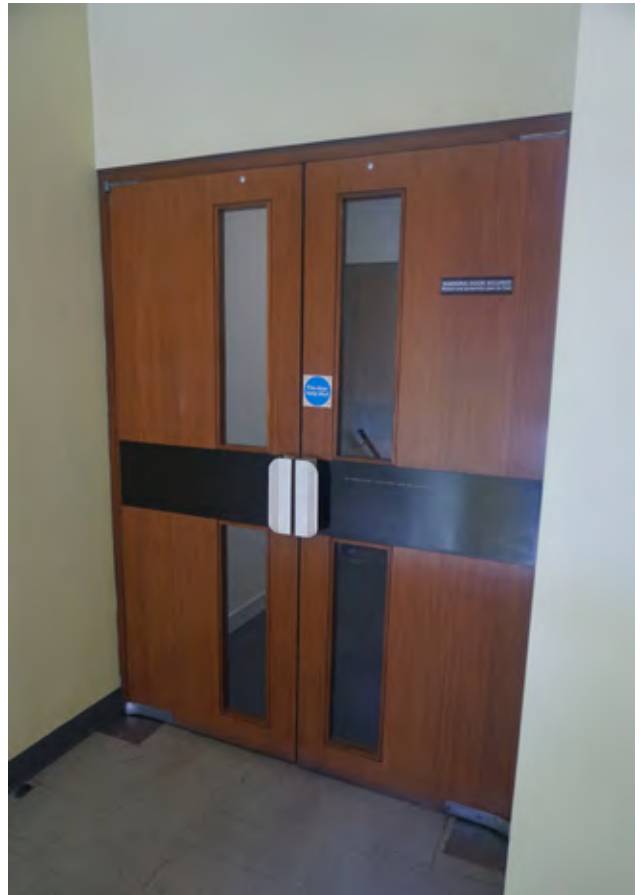
43A Southern staircase treads, Kingsway block (Insall)



43B Southern staircase, Kingsway block (Insall)



44A Original secondary staircase, Kingsway block (Insall)



44B Staircase compartment doors, Kingsway block (Insall)

3.3 The Tower Block: 1 Kemble Street

3.3.1 Exterior

The cylindrical tower block rises 15 storeys over a two-level basement in an arrangement of interlocking, tapered cruciform units in pre-cast polished white concrete visible in views from street level to either side of the Kingsway block **[plate 45 and see plate 40A]**. The first floor and tower above rest on tapered, Y-shaped concrete pilotis that encircle a recessed ground floor **[plate 46]**. The rear of the ground floor is clad in solid dark brick, to which unsightly modern plant units have been affixed in places, whilst the principal entrance has been refurbished with new glazing and entrance openings which are of no significance. Aluminium-framed windows are largely original and uniformly set-back between the structural cruciforms, creating texture and interest.

Curved ramps lead into and out of the underground parking levels, weaving between the concrete pilotis; these and their access stairs with concrete treads that mirror those of the southern stairway to the Kingsway block, are original **[plates 47A-C]**. The ramp entrance at sub-basement level has been blocked with a modern breeze-block partition. Elsewhere within the tower block forecourt there is an original curved extract cover clad in white mosaic tile at the western corner of the plot, as well as a polygonal concrete bench nearer Keeley Street, which also conceals an extract **[plates 48A-B]**.



45 Tower block exterior (Insall)



46 Ground floor pilotis, tower block (Insall)



47A Original garage ramps (Insall)



47B Original garage ramps (Insall)



47C Original ramp access stairs (Insall)



48A Original forecourt mosaic extract enclosure (Insal)



48B Original forecourt concrete extract cover (Insal)

The roofline has been cluttered by the ongoing addition of plant and telecommunications services in the late-20th and early-21st century, which is visible from the street in places, and this detracts from the appearance and significance of the building.

3.3.2 Roof

The circular flat roof is obscured by a substantial amount of modern and visually detracting plant, conduit, metal access platforms and telecommunications equipment [plates 49A-C]. The platforms extending over the full-height semi-circular mixed mode ventilation ducts are also a modern addition [plate 50]. Sections of the glazed walkway encircling the original top floor were added in the late-1970s, set upon a raised floor [plates 51A-B].

3.3.3 Interior

As in the Kingsway block, the interiors to the tower block have been substantially refurbished, including the principal entrance lobby which now comprises all new finishes, openings and glazing of no significance [plate 52]. The original staircases from the lobby to the showrooms above have been removed, but the secondary stair behind the reception area in white mosaic cladding and terrazzo flooring is original, as are the two secondary stairs from first to fourteenth floor level [plate 53]. The office floors have been heavily modernised and are of no significance overall, but the late-20th century or early-21st century suspended ceilings and boxing detract as they awkwardly abut the windows and truncate the original interior volumes [plate 54]. The concrete basement and sub-basement parking areas are also of no significance in terms of their fit-out, and these floors have also been altered with new concrete block partitions and modern storage areas [plate 55].

The two full-height mixed-mode ventilation ducts have been clumsily obscured at the bottom and top by late-20th century plant and metal-clad conduit routes, which have also somewhat impeded their original function [plates 56A-C]. In the centre the original ventilation duct is still legible, though interior windows in both areas are later replacements of no significance [plate 57].



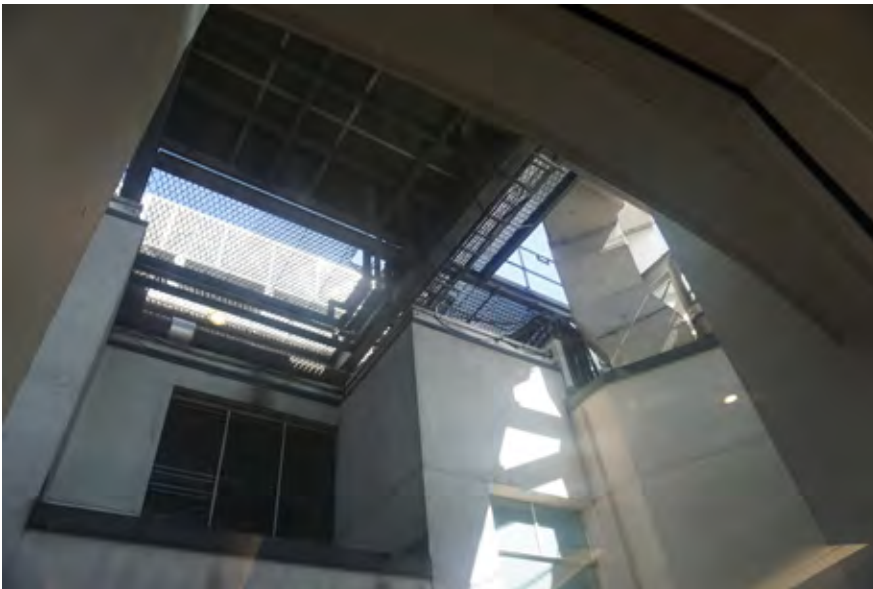
49A Tower block roof plant (Install)



49B Tower block roof plant (Install)



49C Tower block roof plant (Install)



50 Tower block, modern roof platform over interior area (Insall)



51A Tower block roof enclosure (Insall)



51B Tower block roof enclosure (Insall)



52 Refurbished principal entrance lobby to tower block (Insall)



53 Tower block, original secondary staircase (Insall)



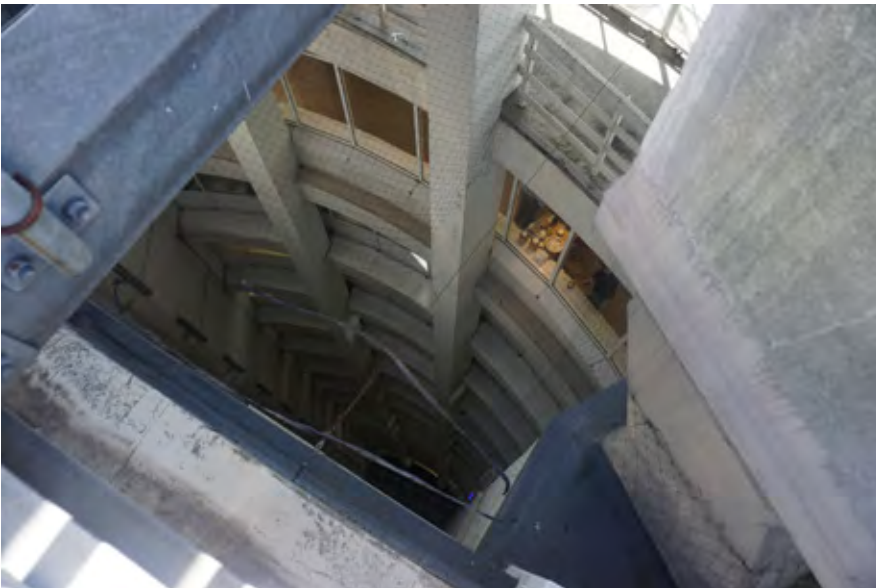
54 Refurbished tower block office space (Insall)



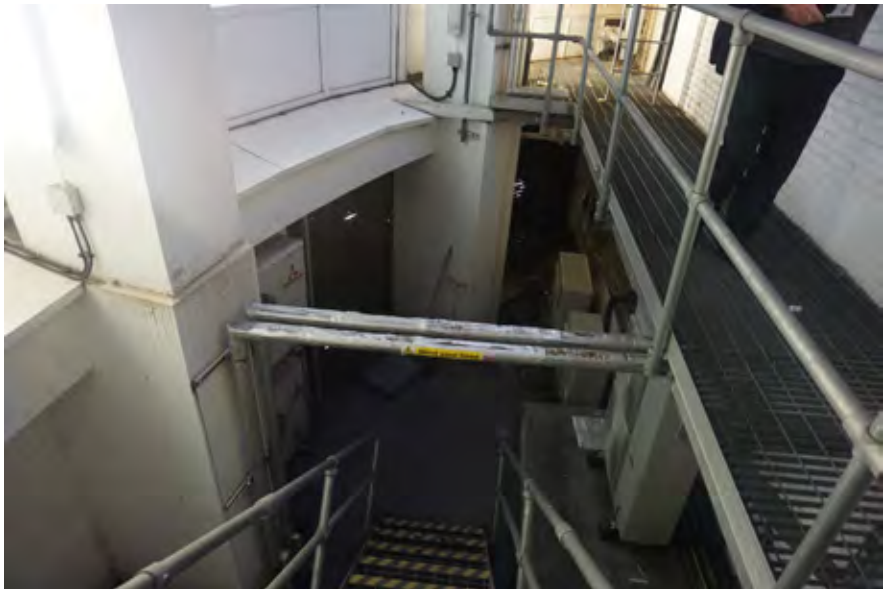
55 Tower block, underground garage area (Insall)



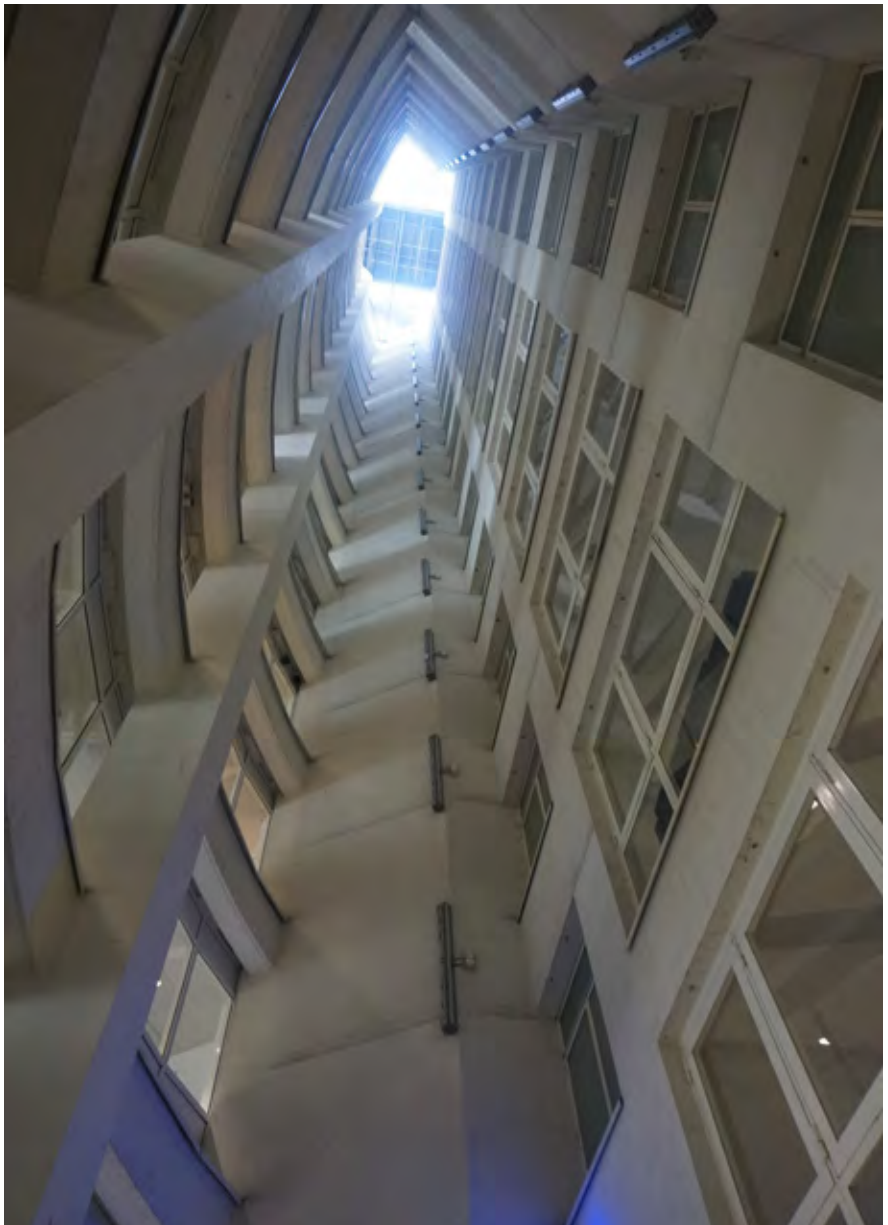
56A Tower block mixed mode ventilation duct with modern infill (Insall)



56B Tower block mixed mode ventilation duct (Insall)



56C Tower block mixed mode ventilation duct infilled with modern metal staircase (Install)



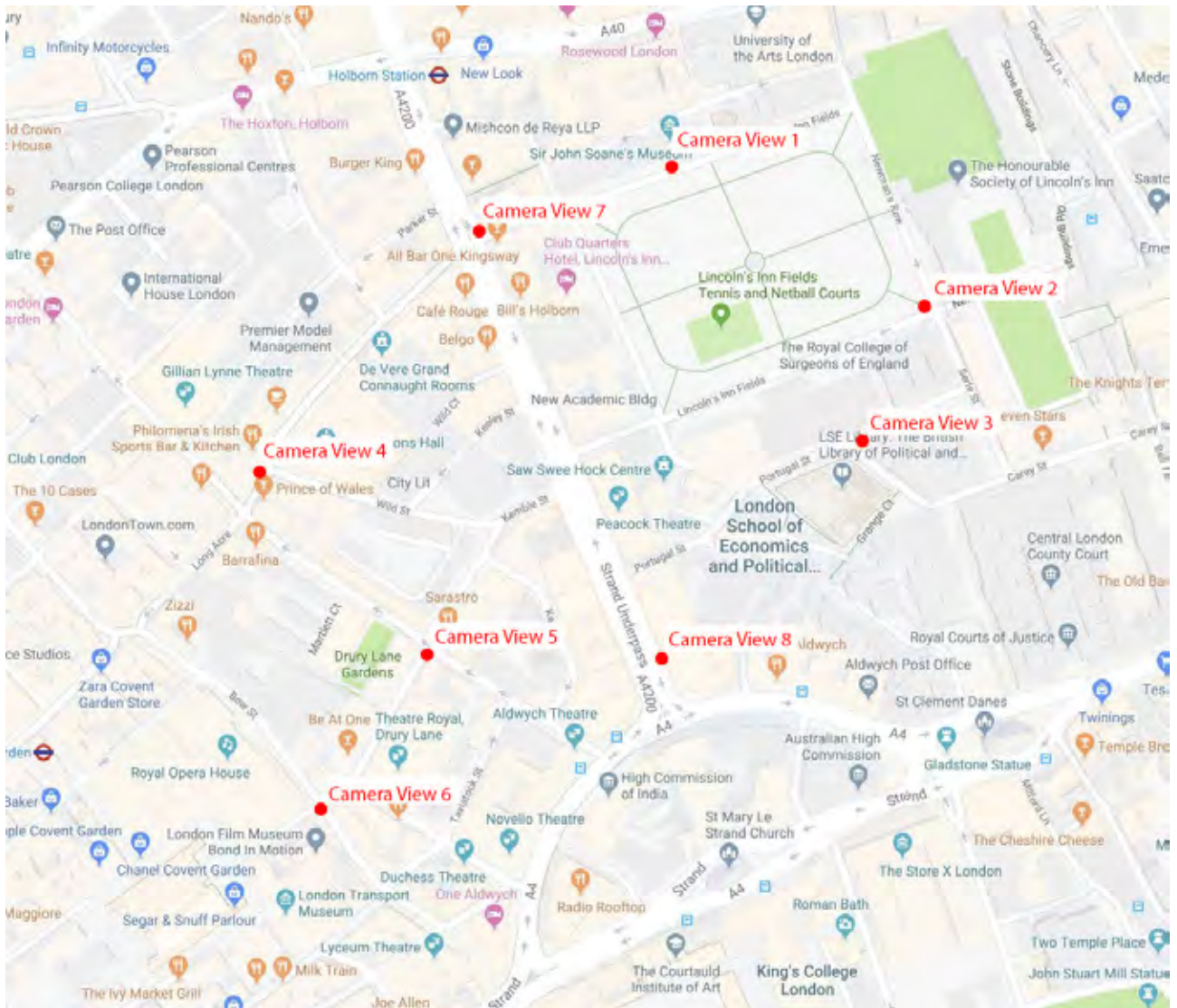
57 Original mixed mode ventilation duct, tower block, now partially enclosed at roof level with a modern plant deck (Install)

4.0 Heritage Views Impact Assessment

4.1 Introduction and Study Area

Space House, and particularly its tower block, is presently visible within a number of street views, including from points within the Kingsway Conservation Area, Bloomsbury Conservation Area and Seven Dials (Covent Garden) Conservation Area in Camden, The Strand and Covent Garden Conservation Areas in the City of Westminster, and in View 16A of the London View Management Framework. In addition to the latter, eight additional views from within the local area, most of which are located within the aforementioned conservation areas, have been analysed to determine the impact of proposals upon the wider townscape setting, including the setting of other nearby listed buildings, as requested and agreed by the London Borough of Camden.

The viewpoints are identified on a map of the surrounding area **[plate 58]**, and are analysed below according to the guidance set out by the NPPF (2019) and GLVIA (2013) as outlined in Section 1.2 of this report. Each is accompanied by an existing view and render of the proposed scheme by Squire and Partners for illustrative purposes.



58 Map illustrating locations of selected local views for analysis (Squire & Partners)

4.2 Existing and Proposed View Assessments

LVMF View 16A, River Prospect: the South Bank

Presently, only the tower roof is visible in LVMF View 16A; this includes its untidy array of rooftop plant structures and services, which detract from the view from the South Bank of the Thames. The view is dominated by Somerset House and views of the riverfront; the area behind Somerset House has been infilled in part by modern development, though its dome remains an articulated feature of the skyline [plates 59A, 60A and 61A]. As the view changes somewhat moving eastward from Waterloo Bridge, three viewpoints have been analysed to determine the comprehensive impact of the proposed scheme upon this view, illustrated by renders of the proposed tower composition [plates 59B, 60B and 61B].

In the eastern and westernmost perspectives from this vantage point (visible in plates 59B and 61B), the proposed tower extension would remain clear of the central dome of Somerset House, and would abut the east side of the dome in views from the central perspective (as visible in plate 60B). However, the quality of the proposed extension would allow the distinctive pattern of the concrete exterior of the listed building to be appreciated and offer a pleasing contrast to the classical exterior of Somerset House. The high-quality design would also provide a much cleaner, streamlined profile and thus an improvement to the disarray of plant atop the tower which presently forms part of the skyline and negatively impacts the view of Somerset House. Therefore, the impact that the proposals would have on View 16A is considered acceptable in heritage terms.

It is also noted that Historic England has been consulted on the impact that proposals may have on LVMF View 16A, and they do not object to the proposed scheme in terms of this protected view, pending design details of the tower extension's facsimile approach.



59A Existing LVMF View 16, west (Squire & Partners)



59B Render of LVMF View 16, west (Squire & Partners)



60A Existing LVMF View 16, central (Squire & Partners)



60B Render of LVMF View 16, central (Squire & Partners)



61A Existing LVMF View 16, east (Squire & Partners)



61B Render of LVMF View 16, east (Squire & Partners)

**View 1: Sir John Soane's Museum, north side of Lincoln's Inn Fields
(Bloomsbury Conservation Area)**

The view looking southwest from the Grade I-listed Sir John Soane's Museum building and north side of the Grade II-listed Lincoln's Inn Fields also falls within the boundary of the Bloomsbury Conservation Area. While largely concealed by foliage in summer and autumn, the tower block is presently visible from this vantage point during other times of the year, including its uppermost stories and substantial rooftop plant **[plate 62A]**. The proposed tower extension would remain visible from this view and extend 2 storeys taller **[plate 62B]**. Therefore, the facsimile approach of the extension would allow the pattern of the most significant element of Space House – the multi-faceted, cruciform exterior of its tower block – to be appreciated within this view, replacing the fragmented view of the uppermost floor which is presently visible. Views of unsightly plant fixtures would be replaced with a pleasingly streamlined rooftop enclosure which visibly steps back from the original parameter of the tower. These factors, and considering that despite the increase in height the building would still blend in with other buildings in the middle ground, would mean that the proposed tower extension would enhance the view from this point and is therefore acceptable in heritage terms.



62A Existing view from Sir John Soane's Museum (Squire & Partners)



62B Render of view from Sir John Soane's Museum (Squire & Partners)

View 2: Junction of Newmans Row and Lincoln's Inn Fields, Southeast (Bloomsbury Conservation Area)

The view looking west from the southeast corner of the Grade II-listed Lincoln's Inn Fields would also be visible from the Grade II*-listed New Hall, and the Grade II-listed 11A New Square and Land Registry buildings. The tower block of Space House is presently visible from this point and forms an interesting Modernist terminus to the view. However, the disorderly bulk of plant and services on its roof presently detract from this vista and from the wider setting of the adjacent listed buildings **[plate 63A]**.

The proposed extension to the tower also would be visible and still sit comfortably within the foliage line of Lincoln's Inn Fields to the north and parapet line of the six-to-eight storey Victorian and Edwardian buildings to the south **[plate 63B]**. As much of the proposed extension would be a facsimile of the highly-significant current exterior of the listed building, and the set-back roof enclosure would rationalise the present visible clutter at the top of the building, the proposed scheme would enhance this important view.



63A Existing view from southeast corner of Lincoln's Inn Fields (Squire & Partners)



63B Render of view from southeast corner of Lincoln's Inn Fields (Squire & Partners)

View 3: Portugal Street, near the junction with Carey Street (The Strand Conservation Area)

This also comprises a view of Space House looking west, but it originates to the southwest of View 2 behind the Grade II*-listed Royal College of Surgeons. The upper floors of the tower and its rooftop plant are clearly visible from this point at present, and the bulky silhouette of the plant particularly detracts from the skyline **[plate 64A]**. The proposed tower block extension would also be visible from this point, and would offer a more rationalised view of the listed building and skyline **[plate 64B]**. However, construction of a new, ten-storey building at 44 Lincoln's Inn Fields (opposite the southwest corner of the Fields) has commenced, consented in July 2017 (RN 17/01479/FULL), and will be erected within the middle ground of this view; this will ultimately conceal views of Space House from this perspective.



64A Existing view from Portugal Street & Carey Street (Squire & Partners)



64B Render of view from Portugal Street & Carey Street (Squire & Partners)

View 4: Great Queen Street and Wild Street, near the Freemasons' Hall (Seven Dials (Covent Garden) Conservation Area)

The tower block is presently visible from within the Seven Dials (Covent Garden) Conservation Area from Great Queen Street near Freemasons' Hall (Grade II*, 1927-33). The curve of the tower makes a distinct impression rising above a somewhat narrow street view along Wild Street, though plant fixtures currently visible at the roofline detract **[plate 65A]**. The proposed tower block extension would lift the view of the building somewhat, and present views of rooftop plant would be replaced by the cleaner lines of a streamlined 'cap' which would remain clearly set back from the perimeter line of the original building **[plate 65B]**. The proposed scheme would have a beneficial impact on the setting of the Grade II*-listed Freemasons' Hall, whilst remaining subservient to it in views from the conservation area. Thus, the proposals from this perspective are considered acceptable in heritage terms.



65A Existing view from corner of Great Queen Street & Wild Street (Squire & Partners)



65B Render of view from corner of Great Queen Street & Wild Street (Squire & Partners)

View 5: Drury Lane and Russell Street Junction (near boundary of Covent Garden Conservation Area)

The intersection of Drury Lane and Russell Street is located just outside of the boundary of the Covent Garden Conservation Area. As this is located only a block away from Space House, both its tower block and slab block fronting Kingsway are currently visible from this point at the end of a narrow street lined with residential buildings [plate 66A]. The tower rises in the distance above the six-storey return elevation of the Peabody Estate, its curved elevation providing pleasing contrast to the linear elevations lining Russell Street. The lower slab block forms part of the terminus of this view, partially concealed by greenery in warmer months

The proposed extensions to both blocks would largely maintain the visible proportion between the individual elements of the listed building [plate 66B]. Within this view the extensions would arguably improve the relationship, as the tower block, when viewed together with the slab, appears somewhat truncated, if not squat. The impact of the extensions would be minimised by the facsimile approach to the tower block design, as well by the slight increase in visible massing to the present rooftop enclosure of the slab block, which would maintain proportionality between the two components in views. Both extensions, however, would remain visibly subservient to the listed building from this vantage point, and enhance their role within the skyline.



66A Existing view from Drury Lane & Russell Street (Squire & Partners)



66B Render of view from Drury Lane & Russell Street (Squire & Partners)

View 6: Wellington Street and Russell Street Junction (near boundary of Covent Garden Conservation Area)

The view from this point also lies just outside the Covent Garden Conservation area, along a narrow street lined with commercial and theatre buildings. The tower block as existing is partially visible rising above the lower brick elevations lining the east side of Russell Street and providing material contrast. The Kingsway slab block also offers Modernist contrast to the streetscape and forms the terminus of the view, though the rooftop plant at its southern end is presently visible and breaks up the horizontality of the slab **[plate 67A]**.

In the proposed view, the extension to the Kingsway block makes a more noticeable impression than the extension to the tower block, particularly as the proposed upper floor of the tower is clearly set back from the principal elevation **[plate 67B]**. The proposed extension to the slab would envelop the existing roof enclosure to the north and replace significant visible rooftop plant to the south. Whilst this would have an impact upon views of the listed building, the proposed extension would be provided a mosaic treatment similar to the cladding of the existing roof extension, and maintain the proportion between the higher and lower elements of the overall composition. Therefore, this is not considered to be harmful to the view of the listed building.



67A Existing view from Wellington Street & Russell Street (Squire & Partners)



67B Render of view from Wellington Street & Russell Street (Squire & Partners)

View 7: Kingsway (north) and Remnant Street Junction (Kingsway Conservation Area)

The slab block is visible in views looking south down Kingsway from the east side of the street, providing a linear break within the streetscape in the design of its principal elevation when compared with the rhythmic bays of the neighbouring Edwardian frontages, which draw the eye upward. The roofline and rooftop plant of the tower block are just visible behind the slab in existing views when not obscured by foliage **[plate 68A]**.

The proposals increase the visibility of the tower block from this perspective, rising above the slab block and extending the view of the Modernist composition from the street **[plate 68B]**. This would make an impact on the Edwardian streetscape of Kingsway, but the tower would be directly aligned with the slab block in the foreground, and would read as a combined and distinctly Modernist insertion, as originally intended, particularly given the facsimile extension approach proposed for the tower.

The proposed extension to the Kingsway block would also be partially visible here, but as at present this view comprises the back end of a service enclosure, the proposals would offer an improvement. The extension would be set back from the parapet, and would be clad in mosaic tile similar to the existing roof enclosure. It would also fit within the horizontality of the existing building in south-facing views down the street. Therefore, the impact which proposals would have in this view would cause no harm and would be considered acceptable in heritage terms.



68A Existing view from Kingsway (north) & Remnant Street (Squire & Partners)



68B Render of view from Kingsway (north) & Remnant Street (Squire & Partners)

View 8: Kingsway (southeast side), near Metro Bank (The Strand Conservation Area)

The view of the existing building becomes more apparent from the south in northward views along the east side of Kingsway. Depending on the state of foliage, the slab block is visible in narrow views aligning with robust Edwardian commercial frontages, though largely concealed in summer by trees **[plate 69A]**. The tower block is not visible.

The tower block would remain concealed from view from this vantage point. The extension to the Kingsway slab block would be visible, but it would remain substantially set back from the parapet line with curved corners intended to soften its frontage **[plate 69B]**. It would be clad in mosaic tile which mirrors that of the block's existing roof enclosure, and any glazing to the extension would be broken up by panels in the same mosaic. As with the rest of the Kingsway elevation, the proposed extension would also be concealed by foliage in warmer months.

Proposals would also improve northward street views of the ground floor of the Kingsway block, where existing late-20th century shopfronts which detract from the building would be replaced with shopfronts carefully designed to be more sensitive to the listed building which would help to enliven the frontage and improve interaction with the building at street level. Whilst proposed changes and the Kingsway extension would be visible here, they are not harmful in heritage terms.



69A Existing view from Kingsway (southeast) (Squire & Partners)



69B Render of view from Kingsway (southeast) (Squire & Partners)

4.3 Conclusion

The existing images and proposed renders which accompany this assessment demonstrate the impact that the existing building has and the proposed scheme would have on both View 16A of the London View Management Framework, and also upon eight more immediate perspectives located within a number of conservation areas in both the London Borough of Camden and City of Westminster.

The elements of the proposed scheme with the most impact on views and setting comprise the extension to the tower block, and, in some views, the extension to the slab block fronting Kingsway. As the existing upper storeys of the tower and the bulk of its unsightly roof plant are presently visible in most of the identified views, it is considered that the proposed treatment of this area, including a one-and-a-half storey facsimile extension and a subservient roof 'cap' set back from the parapet, would substantially improve current views of the roofline by offering a streamlined and rationalised design approach which would remain sensitive to the character and appearance of the listed building.

Likewise, the Kingsway block extension would also offer a cleaner rooftop treatment, replacing an array of plant and an original roof service enclosure. Whilst it was never intended to form a key part of the Kingsway frontage, the mosaic materiality of the extant enclosure would be reflected within the mosaic cladding provided for the new extension, which would be set back from the parapet to read as a new element to the building. This extension would be visible within fewer of the selected views as it would sit much lower than its tower counterpart, instead having the most impact on views from the direction of Covent Garden and along Kingsway. In the case of both the tower and Kingsway slab block extensions, the potential impact of all assessed views has been mitigated by careful and sensitive design, which has ensured that the extensions remain subservient to the listed building and allow the original and celebrated forms of its exterior to remain dominant. Therefore, whilst the proposed elevations would be visible in local views, they are not considered to cause harm in heritage terms, and in any cases where harm may be perceived, this would be less than substantial in light of policy put forward the NPPF regarding impact on setting.

Proposals also accord with guidance set out in the London Plan and London View Management Framework (LVMF), which, regarding background development within View 16A, states that:

Development in the background of Somerset House should not dominate the landmark. Improvements to the setting of the landmark are encouraged through appropriate, high-quality design that respects Somerset House as the principal building in the view. The skyline of the view could be improved by new development of high architectural design quality in the background that respects the horizontal composition of the view and the dominance of Somerset House.

In accordance with current national and local heritage policy, the proposed scheme would not cause substantial harm to views of the listed building, the setting of the listed building or the character or appearance of the Kingsway or surrounding Conservation Areas. Therefore, the proposals are considered acceptable in heritage terms.

5.0 Commentary on the Proposals

5.1 Description of the Proposals

Proposals by architects Squire and Partners seek to reinvigorate the Grade II-listed Space House (also known as CAA House), a 1960s commercial development by Richard Seifert and Partners, which has been under-utilised as a London Modernist landmark for decades. In common with other 20th century landmark buildings such as Centre Point and Battersea Power Station, part of the aim of the scheme is to improve the sustainability of the building and to maximise the use of the accommodation on the site. The proposals include sensitively-designed, limited and proportional extensions and the repurposing of low quality areas which have historically been underused or utilised for servicing or car parking. The intention is also to provide modern M&E services which improve energy efficiency without compromising the special interest of the listed building.

Allied with this is a key aim to make major improvements to the surrounding public realm and to the relationship between the building and the Kingsway Conservation Area. The relationship between Space House and its ground level setting has been an issue since its construction, and the proposed introduction of ground floor uses are designed to engender pedestrian movement, enhance original fabric and increase the vitality of the presently dismal immediate setting. However, to achieve these goals and provide the listed building with long term viability requires some changes, and these are described below.

The proposed scheme has evolved following a series of pre-application consultations with both Historic England and the London Borough of Camden, including a design workshop. The proposals reflect officers' advice. For a detailed description of proposals, please refer to the document prepared by Squire and Partners which accompanies this report. Key components of the proposed changes to the listed building are outlined as follows:

Exterior

- The addition of a two-storey facsimile rooftop tower block extension with a set-back 'cap' feature for office use;
- The addition of a single-storey rooftop extension to the slab block which would step back from the Kingsway façade and southern end of the building, and be clad in mosaic reflecting the materiality current roof enclosure;
- The cleaning of the concrete and granite façades, including repairs where necessary;
- The creation of a publically accessible ground floor area within the tower, including an enlarged reception lobby and café space set beneath the architecture of original canopy at the west side of the tower block, which would entail the replacement of the detracting c. 2000 ground floor entrance extension with streamlined glazing set behind the tower's original pilotis;

- The replacement of the low quality glazed infill beneath the south end of the Kingsway block with a pushed-out, light-touch glazed design that would allow the two original sculptural plinths and open mosaic staircase to be viewed as a composition both inside and outside the building;
- The opening-up of the rear wall at the ground floor of the Kingsway block and the removal of detracting ground floor shopfronts to accommodate proposed double-fronted retail units;
- The replacement of fenestration throughout both blocks with new aluminium frames in the style of the original and double-glazing; and
- Improvements to the public realm between the blocks and to the west side of the site and in public circulation routes as designed by Gustafson, Porter + Bowman.

Interior

- The renewal of the principal entrance and reception at the north end of the Kingsway block, including the replacement of the extant detracting staircase with one more in-keeping with the original design;
- The replacement of low quality office fit-outs at all levels of both blocks with refurbished office interiors;
- The removal of modern suspended ceilings to reveal original concrete ceiling structures within both blocks;
- The expansion of the lift core within the tower block and infill of its interior mixed mode ventilation ducts;
- The infill of mixed mode ventilation ducts within the tower block;
- The opening up of the two basement car park and storage levels below the tower block to create two useable floors;
- The removal of two of three original car park ramps leading from the west side of the site to the basement levels to maximise the use of presently redundant basement space.

5.2 Justification of Proposals

The proposed scheme for Space House reflects ongoing conservation, planning and design officers' feedback, resulting in a thoughtful design that has carefully considered the special interest and character of the listed building and its setting. The following analyses the impact of key components of the present scheme in heritage terms.

Proposed Extensions

The proposed tower block extension would utilise a careful facsimile approach and remain in balance with the Modernist symmetry of the tower's original design. Whilst the tower exterior is of highest significance, a conspicuous late-20th century plant deck and general rooftop clutter detract from the character of the building and blights a number of views including LVMF View 16A. The extension proposes to address this by relocating some plant to the basement and concealing other units with a design which provides roofline interest, as demonstrated in accompanying visuals by Squire and Partners. It is considered the proposed extension to the tower would enhance the character and appearance of the overall architectural composition, adding a small amount of extra height to address its somewhat truncated appearance, and if any perceived harm is caused to the special interest of the listed building this would be less than substantial and balanced by the additional heritage and public benefits of the wider scheme.

As discussed in Section 4 of this report, the extension would be visible in views from within the Kingsway, Bloomsbury and Seven Dials (Covent Garden) Conservation Areas in the Borough of Camden, and from The Strand and Covent Garden Conservation Areas in the City of Westminster. The tower is currently already visible in local views, and though its curved form provides architectural interest, it makes an overall lacklustre presentation and its present conspicuous clutter of rooftop plant and servicing detracts in these views. A high quality extension design would alleviate this and could elevate the detracting impact the roofline of the tower presently makes in conservation area views to a positive contribution, which would be of public benefit.

The proposed extension would also be partially visible within the London View Management Framework View 16A from the South Bank looking toward Somerset House, directly behind the right side of its dome. This is principally a dynamic view, so the potential impact of proposals changes by degrees as the viewpoint moves. However, it is also noted that this protected view has already been altered by recent development and the silhouette of the dome of Somerset House has already been compromised. The proposed tower block extension would comprise a streamlined profile which would allow the dome to remain the focal point of the view.

The proposed roof extension to the Kingsway block would also remain subservient to the original building. It would step back from the Kingsway façade to reduce its visual impact, whilst maintaining the established proportion between the tower and the much lower horizontal slab – the latter a key component of the significance of the composition. The ends of the proposed extension have been curved to have more sensitive impact on views of the listed building, and the extension would be clad in a mosaic similar to that of the existing original rooftop plant enclosure. Though the extension would result in the loss of some original fabric and alter the appearance of the Kingsway block, it would cause less than substantial harm to the significance of the listed building overall, and would have a neutral impact on views from the Kingsway Conservation Area. This would be further balanced by the benefits of delivering modern office floor space, as well as access to the roof, which would provide impressive views of both the conservation area and the tower block, allowing both heritage assets to be better-appreciated.

Proposed Ground Floor-Level Alterations

The proposed enclosure of the area below the original canopy to the west of the tower and the expansion of the enclosure beneath the south end of the slab block would cause some harm to the significance of the listed building, as it would impact the 'floating' quality of the overall composition. However, the use of light-touch, streamlined glazing would minimise this and ensure that the original forms of the building remain visible. It would also allow the extant c. 2000 detracting entrance enclosure and signage to Kemble Street and stairway enclosure below the Kingsway block to be removed, overall, therefore the change would result in an enhancement.

The infill below the western tower canopy would house a proposed ground floor flexible retail and A1/A3 space. This would be set back and glazed to ensure the legibility of both the original sculptural pilotis, which sit below the radial projection of the tower, and textured underside of the canopy projection. The area would face the intersection of Wild Street and Keeley Street, and provide the additional benefit of increased footfall within a presently neglected area of the townscape; this in turn would enhance

activity and interaction with the listed building from the west, where there is presently no public internal access. A new office reception area is proposed at the ground floor just east of this; pilotis here would remain exposed, as the outer glazed wall would be set behind them. The original tower lobby area was altered by the awkward expansion of the original tower entrance and insertion of detracting signage in c. 2000 and is now, according to the list description, of little interest. The proposals would maintain an entrance in an original location, while offering an elegant streamlined street frontage that would enhance the listed building.

The area around what was originally an external stair at the south end of the Kingsway block was enclosed with particularly low quality glazed partitions in the late-20th century; heavy aluminium mullions and overbearing advertising currently congest the space and obscure views of the original mosaic stair and views to the rear of the site. Proposals would replace these partitions with full-height glazing which would sit within the edge of the south end of the block and allow the stair once again to be viewed in tandem with the original concrete pilotis to either side. Enclosing the pilotis and stair would, overall, result in an enhancement to the significance of the listed building as it would improve the current arrangement, allowing the sculptural elements to be viewed as a composition together from within an internal seating area. The proposed glazing would be slim-line in character without transoms, and would also improve views of the composition from street views. This proposed food and beverage area at the south end of the slab block would also draw people from Kingsway into the public realm area proposed between the blocks and west of the tower.

It is also proposed to reinstate the original retail use on the ground floor of the Kingsway block, replacing the current detracting metal cladding on the front of the building with glazed shopfronts, and opening the brick wall at the rear to accommodate double-fronted ground floor flexible retail and A1/A3 units. Though the brick to the rear elevation is original the area was intended to be secondary in nature facing a rear service yard, and its alteration would have no impact upon the significance of the listed building. The proposed flexible retail units would also activate what has become a cold and somewhat bleak ground floor frontage to Kingsway, improving both the relationship between the building and the conservation area/ public realm and the overall appearance of the building and footfall to areas behind the Kingsway block which are presently neglected.

Proposed Changes to Fenestration and Façade Cleaning

It is proposed to replace the aluminium frames and glazing of the original windows of the tower and slab blocks with modern units in the form and finish of the originals. Glass would be upgraded with double-glazing to all windows to achieve improved thermal performance as required for Grade A office space, and the solid spandrel panels to the tower block windows would be replaced with mesh-infill glazed panels which would appear solid from the outside but allow some light to permeate internally to address low floor-to-ceiling heights internally. This would cause less than substantial harm to the significance of the listed building through the loss of fabric, but the original composition of the mullions and transoms would be maintained legibly, and the overall appearance of the building would therefore be preserved. It has to be remembered that Space House was built at a time before the energy crisis of the 1970s, when fuel was cheap and the construction methods adopted assumed this would carry on forever. However, the acknowledged threat of a changing climate means that

larger buildings must now adapt to be sustainable and secure their long-term viability. Quite rightly this was the philosophy adopted in the recent restoration of Centre Point, and this scheme intends to follow that lead.

In addition, the façades of the tower and slab block, which have dulled over time with a noticeable accumulation of grime particularly visible at joints and to the concrete of the tower block, would undergo conservation cleaning. Together with the updates to the window frames, this would restore the original sleek appearance intended for both elements of the composition.

Proposed Alterations to the Basement Levels and Ramps

It is proposed to open up the two basement levels which presently extend below the entire site. The lower level would maintain its ramp access to accommodate a generous cycle storage area, and UKPN would retain its demise below the tower. The rest of the area would be designated for plant, storage and a spacious expanse of lettable ancillary or flexible retail/A1-A3 space, and flexible B1 and events space that would feature a double-height open area lit from above by pavement lights. These levels were originally designed for car parking and their fabric is of no interest; therefore, alterations here would have a negligible impact on the significance of the listed building. The ramp presently most visible from the street would be retained, and while the loss of the two additional concealed ramps would cause harm to original fabric, they are utilitarian in nature and their use has been made redundant (basement access via one of the ramps is presently blocked with a modern partition); therefore, the harm would be less than substantial. In addition to enabling the flexible use of the basement levels, the space gained from their proposed removal would allow for the creation of the aforementioned flexible retail space at the ground floor, improve public engagement with the building fabric, and open previously closed, back-of-house areas, which would be a heritage benefit.

Proposed Infill of Mixed Mode Ventilation Ducts and Expansion of Lift Cores

The two ventilation ducts within the tower would be partially infilled at all floors with service risers and WC accommodation. As these spaces were designed as principally utilitarian service areas, this would have a neutral impact on the significance of the listed building. It is also proposed to increase the number of lifts within the tower by two, and to insert a new lift core near the centre of the Kingsway block. This would impact fabric of low significance and would therefore have a neutral impact on the overall significance of the listed building, whilst improving access to and circulation within the building's interiors. Interior finishes from the first floor and above would be updated to meet modern office use expectations, and M&E systems would be renewed. As, according to the list description, 'the doughnut-shaped office floors are not of special interest' within the tower block and 'the open-plan office interiors are not of special interest' within the Kingsway block, this would cause no harm to the significance of the listed building, whilst the subsequent improvements would ensure that the site remains within its optimum and viable use as commercial offices.

Proposed Improvement of the Public Realm

The public realm in the area immediately surrounding Space House has been in need of improvement since the building's construction, as very little attention was paid to these spaces as part of Seifert's original

commercial scheme and they have been largely neglected since. The resulting drab and hardened character of the key corner site has always had a negative impact on the largely residential townscape to the west of Kingsway. The proposals would soften this through the addition of greenery and seating to the west of the site at the intersection of Keeley Street and Wild Street, and throughout the area between the two blocks of the building. The present, post primary construction, unsightly and detracting metal perimeter railings to the west of the site would also be removed, as well as the security kiosk, both of which are identified as being 'not of special interest' by the list description, whilst the much more significant sculptural ventilation cover and mosaic-clad corner projection would be cleaned and integrated into the scheme. These proposals would enhance the public realm and encourage pedestrian footfall and animate the site during business hours in areas which are presently underutilised and designated for services. They would also enhance street-level views of the site from within the local area and from the neighbouring conservation areas, including The Strand Conservation Area of which the south side of Kemble Street forms a part. As such, proposals would have a positive impact on the listed building and its setting and the character and appearance of the adjacent conservation areas.

5.3 Conclusion

The submitted proposals by Squire and Partners and Gustafson, Porter + Bowman are considered to preserve the special architectural and historic interest of the listed building, which resides overwhelmingly in the principal external elevations of both the tower and Kingsway blocks. They are also considered to preserve the character and appearance of the Kingsway Conservation Area, of which the Kingsway block forms a part, and improve views from additional conservation areas which are adjacent. The interiors of the building were originally designed to be flexible for the sake of commercial use and have since been extensively refurbished; therefore there is little of significance internally, though proposals will make most of extant original fabric by revealing the internal structure of the concrete ceilings.

The wider proposed scheme offers substantial public benefits which would outweigh any perceived 'less than substantial harm', therefore meeting the tests within the NPPF for sustainable development insofar as these relate to the historic environment. The building's optimum viable use as a commercial complex – a key part of its significance as outlined by the building's list description – would be maintained, and the proposed scheme would also accord with the relevant policies of the NPPF, and with Camden Council's local policies regarding the historic environment. The proposals are therefore considered to be acceptable in heritage terms.

Appendix I - Statutory List Description

Space House (now Civil Aviation Authority House)

Grade II

Date first listed: 26 January 2015

List entry number: 1421847

Summary of building: Speculative office development, 1964-8 by Richard Seifert & Partners (partner-in-charge George Marsh) for Harry Hyams
Reasons for designation: Space House, an office development of 1964-8 by George Marsh of Richard Seifert & Partners for the developer Harry Hyams, is listed at Grade II for the following principal reasons:

Architectural interest: as one of London's best speculative office buildings, whose arresting yet subtly-handled exteriors reflect many of the 'Pop' themes at play in the contemporary Centre Point development;
Technical interest: for the innovative use of a precast concrete grid, a form of partial prefabrication that allowed for rapid construction without the use of scaffolding, as well as for striking visual effects;

Historic interest: as an icon of the 1960s commercial property boom, built by the most successful developer-architect partnership of the day, its assertive styling reflecting the confidence and dynamism associated with the period.

History: The triangular site bounded by Kingsway, Keeley Street, Kemble Street and Wild Street was redeveloped in 1964-8 by the property tycoon Harry Hyams and the architects Richard Seifert and Partners, already at that time in collaboration on the Centre Point scheme half a mile to the west. The existing Edwardian building, Magnet House, was replaced by a new speculative office complex known as Space House. Built by Robert McAlpine and Sons, it comprised two buildings: an eight-storey slab facing Kingsway, with shops and a bank at street level and showrooms and offices above, and a 17-storey office tower behind, its cylindrical form an attempt to avoid infringing neighbouring residents' right to light. The two blocks were connected by means of a two-storey link bridge and at the subterranean level by a large underground car park, divided into public and private sections and equipped with a small on-site filling station.

As at Centre Point, the architect-in-charge was George Marsh, and the two projects have a number of features in common, notably the sculptural external treatment with cruciform precast units and massive Y-shaped pilotis. Again like Centre Point, Space House sat empty for some years after its completion, allowing Hyams to accrue (untaxed) income on its increasing rental value. It was eventually let to the Civil Aviation Authority in 1975, although structural defects in the pilotis and radial beams meant that significant remedial work was required prior to occupation (these were technical faults rather than design flaws however). Major refurbishments in the 1996 and 2003 saw the remodelling of the lobby areas in both buildings and, in the Kingsway block, the removal of the shop and bank units and the glazing-in of the open southern stair.

Richard Seifert (1910-2001) was Britain's most successful and prolific commercial architect of the 1960s and 70s. Swiss-born but resident in England from an early age, in 1927 he won a scholarship to study at the Bartlett School of Architecture, where he received a traditional Beaux-Arts education under Professor Albert Richardson. After graduating in 1933 he established his own practice, working on speculative housing schemes in north London. During WWII he served with the Royal Engineers in Burma and India, eventually achieving the rank of Colonel – a sobriquet that followed him throughout his professional life. Seifert's first major building was an office block (later the London headquarters of Woolworth's) in the Marylebone Road, built in a Richardsonian Classical style in 1955. Business picked up in the late 50s with the relaxation of government building controls and the arrival of partner George Marsh (1921-88), who henceforth set the practice's architectural direction while Seifert, with his encyclopaedic knowledge of the planning system and eagle eye for its loopholes, took charge of strategy. The combination of Seifert's legal and tactical brilliance with Marsh's eye-catching, Op Art-esque designs – inspired by Italian and South American architects such as Gio Ponti and Felix Candela, as well as contemporary US Modernists like Gordon Bunshaft and Edward Durell Stone – allowed the firm to ride the crest of the 1960s commercial property wave, becoming the architects of choice for many developers including the notoriously ruthless Hyams.

Office buildings formed the majority of Seifert and Partners' vast output during the 1960s and 70s. Major projects included Centre Point (Grade II), Drapers Gardens (demolished) and the Natwest Tower in central London, the Alpha Tower in Birmingham (Grade II) and Gateway House in Manchester. Other work included numerous hotels (e.g. the cylindrical Park Tower in Knightsbridge) as well as residential developments, exhibition centres, shopping centres, sports halls and cinemas. Seifert retired in 1985; the practice was carried on by his son John, and continues internationally as Sigma Seifert.

Construction and plan: The development comprises two buildings: an eight-storey slab block (45-59 Kingsway) to the east, and a 17-storey cylindrical tower (1 Kemble Street) to the west, linked at first- and second-floor level by an enclosed bridge. Both blocks combine in-situ concrete construction with a structural outer grid of precast units, the latter allowing for rapid construction without the need for scaffolding. In the Kingsway block, this grid forms the long east and west elevations, with a central row of columns providing additional support for the concrete floor slabs. This block has an 'end core' plan, with circulation and services kept to the north and south ends, leaving the central two-thirds of each floor as a single office space. The tower has a circular concrete core, 67ft in diameter, with six 28ft 6in floor panels and pre-stressed beams spanning across to the external grid. An underground car park fills the whole site below street level, with entrance and exit ramps curving round the base of the tower; this was formerly divided into public and private sections, and boasted a small filling station (now removed).

Exterior: The external treatment serves to dramatise the relationship between the Kingsway block, a long rectangular slab with proportions reflecting those of the surrounding Edwardian office buildings, and the tower behind, whose cylindrical form is only glimpsed from Kingsway, and becomes fully apparent only on turning the corner into Kemble Street or Wild Street. The connection between the two buildings is asserted

through the use, in both cases, of an external grid of tapered cruciform precast units; the distinction between them is brought out in the very different ways in which these units are handled.

In the slab, the units are flat-faced and clad in polished grey granite, with the aluminium-framed glazing and dark-coloured spandrel panels set flush with the surface. The solid end-walls are also granite faced, and have tall stair windows whose form recalls an outsize Greek key pattern. At street level, the circulation cores at the two ends of the building are marked by big tapering pilotis of in-situ concrete. The south end, left open at first, has been enclosed by aluminium and glass screens (not of special interest); the foyer at the north end has been remodelled and enlarged, and the original shop units were infilled to create more office space (the infill is not of special interest). The bridge element that connects the two buildings is treated like the slab, but with the glazing recessed to form narrow galleries on each side.

In the tower, by contrast, the concrete – a polished white Capstone aggregate resembling Portland stone – is exposed, and the units themselves have sharply angled profiles with the joints emphasised and the glazing set well back. This arrangement, as well as being visually striking, was intended to shed rainwater and act as a brise-soleil. At ground level, the grid is carried on a ring of huge Y-shaped pilotis, like modified, scaled-up versions of the units above. A raking zigzag canopy cantilevers out on the western side, over what was the site of the filling station. The foyer, facing Kemble Street, originally sat within the ring of pilotis but has been modified and enlarged, with new glass screens and canopy (not of special interest). Also within the pilotis are various service entrances and utility areas (not of special interest).

Interiors: These were never particularly elaborate, and have been much altered in both cases. In the Kingsway block the main feature – originally an external one – is the south stair, whose lower flights form a vertiginous construction with floating concrete treads and white mosaic soffits. The lobby area at the north end has been remodelled and enlarged. Original elements include the floating entrance canopy (now extended) and the black marble revetments to the side wall, with a gilt inscription naming the original architects and builders; the new elements, including the veneer panelling and the flying metal stair, are not of special interest. The open-plan office interiors are not of special interest, nor is the plant room on the roof.

The tower lobby (not of special interest) has been very much altered, with the main staircase to the former first-floor showroom removed and all surfaces renewed; the secondary stair with its terrazzo floor and white mosaic cladding survives behind. The doughnut-shaped office floors are not of special interest.

Subsidiary features: The main features associated with the underground parking arrangements are the entrance and exit ramps, which curve sinuously around the feet of the tower pilotis; with the angular flying access stairs also contributing to the drama. The subterranean parking and service areas themselves are not of special interest.

The original scheme of landscaping has been renewed, and the present *perimeter fence and *security kiosk are not of special interest. The two surviving features are the intake and extractor units to the air conditioning system. The former, at the junction of Keeley Street and Wild Street, is encased within a kidney-shaped sculptural feature clad in white mosaic; the latter, further along Keeley Street, is concealed beneath a polygonal concrete bench.

* Pursuant to s.1 (5A) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act') it is declared that these aforementioned features are not of special architectural or historic interest.

Appendix II - Planning Policy and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 66 and 72 of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

in considering whether to grant permission for development which affects a listed building or its setting, the local planning authority, or as the case may be the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Similarly, section 72(l) of the above Act states that:

... with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (February 2019). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

Paragraph 7 of the Framework states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' and that, at a very high level, 'the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At paragraph 8, the document expands on this as follows:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

and notes at paragraph 10:

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

With regard to the significance of a heritage asset, the framework contains the following policies:

190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 192 of the NPPF identifies the following criteria in relation to this:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 193 the framework states the following:

...great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether the any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

The Framework goes on to state at paragraph 194 that:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.

Where a proposed development will lead to 'substantial harm' to or total loss of significance of a designated heritage asset paragraph 195 of the NPPF states that:

...local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

With regard to 'less than substantial harm' to the significance of a designated heritage asset, of the NPPF states the following;

196. Where a development proposal will lead 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 including, where appropriate, securing its optimum viable use.

The Framework requires local planning authorities to look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. Paragraph 200 states that:

Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Concerning conservation areas it states, in paragraph 201, that:

Not all elements of a Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole.

National Planning Practice Guidance

The planning practice guidance was published on the 6th March 2014 to support the National Planning Policy Framework and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment. The relevant guidance is as follows:

Paragraph 3: What is meant by the conservation and enhancement of the historic environment?

The conservation of heritage assets in a manner appropriate to their significance is a core planning principle. Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural, economic and environmental benefits.

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in everyday use to as yet undiscovered, undesignated buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-taking to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified, the aim then is to capture and record the evidence of the asset's significance which is to be lost, interpret its contribution to the understanding of our past, and make that publicly available.

Paragraph 7 states:

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being;
- and an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Paragraph 8: What is "significance"?

"Significance" in terms of heritage policy is defined in the Glossary of the National Planning Policy Framework.

In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of the identified heritage asset's significance. Some of the more recent designation records are more helpful as they contain a fuller, although not exhaustive, explanation of the significance of the asset.

Paragraph 9: Why is 'significance' important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

The "setting of a heritage asset" is defined in the Glossary of the National Planning Policy Framework.

A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.

When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

Paragraph 15: What is a viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also the future conservation of the asset. It is obviously desirable to avoid successive harmful changes carried out in the interests of repeated speculative and failed uses.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative viable uses, the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes.

The optimum viable use may not necessarily be the most profitable one. It might be the original use, but that may no longer be economically viable or even the most compatible with the long-term conservation of the asset. However, if from a conservation point of view there is no real difference between viable uses, then the choice of use is a decision for the owner.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused provided the harm is minimised. The policy in addressing substantial and less than substantial harm is set out in paragraphs 132 – 134 of the National Planning Policy Framework.

Paragraph 20: What is meant by the term public benefits?

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 7). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Public benefits may include heritage benefits, such as:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset

Historic England: Historic Environment Good Practice Advice in Planning (March 2015)

The purpose of the Good Practice Advice note is to provide information on good practice to assist in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (NPPG).

Note 2 'Managing Significance in Decision-Taking'

This note provides information on:

- assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

It states that:

The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset needs to be proportionate to the significance of the heritage assets affected and the impact on that significance.

In their general advice on decision-taking, this note advises that:

Development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect. The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest.

Paragraph 6 highlights the NPPF and NPPG's promotion of early engagement and pre-application discussion, and the early consideration of significance of the heritage asset in order to ensure that any issues can be properly identified and addressed. Furthermore, the note advises that:

As part of this process, these discussions and subsequent applications usually benefit from a structured approach to the assembly and analysis of relevant information. The stages below indicate the order in which this process can be approached – it is good practice to check individual stages of this list but they may not be appropriate in all cases and the level of detail applied should be proportionate.

- Understand the significance of the affected assets;
- Understand the impact of the proposal on that significance;
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- Look for opportunities to better reveal or enhance significance;
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;

- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The Assessment of Significance as part of the Application Process

Paragraph 7 emphasises the need to properly assess the nature, extent and importance of the significance of a heritage asset and the contribution of its setting early in the process, in order to form a successful development, and in order for the local planning authority to make decisions in line with legal objectives and the objectives of the development plan and the policy requirements of the NPPF.

8. Understanding the nature of the significance is important to understanding the need for and best means of conservation. For example, a modern building of high architectural interest will have quite different sensitivities from an archaeological site where the interest arises from the possibility of gaining new understanding of the past.
9. Understanding the extent of that significance is also important because this can, among other things, lead to a better understanding of how adaptable the asset may be and therefore improve viability and the prospects for long term conservation.
10. Understanding the level of significance is important as it provides the essential guide to how the policies should be applied. This is intrinsic to decision-taking where there is unavoidable conflict with other planning objectives.
11. To accord with the NPPF, an applicant will need to undertake an assessment of significance to inform the application process to an extent necessary to understand the potential impact (positive or negative) of the proposal and to a level of thoroughness proportionate to the relative importance of the asset whose fabric or setting is affected.

Curtilage Structures

15. Some buildings and structures are deemed designated as listed buildings by being fixed to the principal building or by being ancillary within its curtilage and pre-dating 1 July 1948. Whether alteration, extension or demolition of such buildings amounts to harm or substantial harm to the designated heritage asset (i.e. the listed building together with its curtilage and attached buildings) needs careful consideration. Some curtilage structures are of high significance, which should be taken fully into account in decisions, but some are of little or none. Thus, like other forms of heritage asset, curtilage structures should be considered in proportion to their significance. Listed buildings designated very recently (after 25 June 2013) are likely to define curtilage definitively; where this is (or is not) the case will be noted in the list description.

Cumulative Impact

28. The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has

been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape.

Listed Building Consent Regime

29. Change to heritage assets is inevitable but it is only harmful when significance is damaged. The nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be needed if it is to go ahead. In the case of listed buildings, the need for owners to receive listed building consent in advance of works which affect special interest is a simple mechanism but it is not always clear which kinds of works would require consent. In certain circumstances there are alternative means of granting listed building consent under the Enterprise & Regulatory Reform Act 2013.

Opportunities to Enhance Assets, their Settings and Local Distinctiveness

52. Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation.

Design and Local Distinctiveness

53. Both the NPPF (section 7) and PPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:
 - The history of the place
 - The relationship of the proposal to its specific site
 - The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept
 - The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size
 - The size and density of the proposal related to that of the existing and neighbouring uses
 - Landmarks and other built or landscape features which are key to a sense of place
 - The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces
 - The topography

- Views into, through and from the site and its surroundings
- Landscape design
- The current and historic uses in the area and the urban grain
- The quality of the materials

The Extent of Setting

4. The setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset.

The setting of a heritage asset may reflect the character of the wider townscape or landscape in which it is situated, or be quite distinct from it. Extensive heritage assets can include many heritage assets and their nested and overlapping settings, as well as having a setting of their own. I.e. A conservation area will include the settings of listed buildings and have its own setting. All interested parties should be included at an early stage to avoid conflict between setting and other aspects of a proposal.

Views and Setting

5. The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, including a variety of views of, across, or including that asset, and views of the surroundings from or through the asset, and may intersect with, and incorporate the settings of numerous heritage assets.
6. Views which contribute more to understanding the significance of the heritage asset include:
 - those where relationships between the asset and other historic assets or places or natural features are particularly relevant.
 - Those where town-or village-scape reveals views with unplanned or unintended beauty;
 - Those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected;
 - those with historical associations, including viewing points and the topography of battlefields;
 - those where the composition within the view was a fundamental aspect of the design or function of the heritage asset; and
 - those between heritage assets and natural or topographic features, or phenomena such as solar and lunar events.

Even if recent unsympathetic development has affected the setting or views of a heritage asset, consideration will still be given to whether developments would further detract or enhance the significance of the asset.

Setting and the Significance of Heritage Assets

9. Setting is not a heritage asset, nor a heritage designation, though land within a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset. This depends on a wide range of physical elements within, as well as perceptual and associational attributes pertaining to, the heritage asset's surroundings. The following paragraphs examine some more general considerations relating to setting and significance.

Cumulative Change

Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing views of a building.

Change over Time

Settings of heritage assets change over time. Understanding this history of change will help to determine how further development within the asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting in which the asset was constructed are likely to contribute to significance but settings which have changed may also themselves enhance significance, for instance where townscape character has been shaped by cycles of change and creation over the long term. Settings may also have suffered negative impact from inappropriate past developments and may be enhanced by the removal of the inappropriate structure (s).

Access and Setting

Because setting does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting, constraints on access such as remoteness or challenging terrain, and the importance of the setting to a local community who may be few in number. The potential for appreciation of the asset's significance may increase once it is interpreted or mediated in some way, or if access to currently inaccessible land becomes possible.

Buried Assets and Setting

Heritage assets that comprise only buried remains may not be readily appreciated by a casual observer, they nonetheless retain a presence in the landscape and, like other heritage assets, have a setting. These points apply equally, in some rare cases, to designated heritage assets such as scheduled monuments or Protected Wreck Sites that are periodically, partly or wholly submerged, eg in the intertidal zone on the foreshore.

Designed Settings

Many heritage assets have settings that have been designed to enhance their presence and visual interest or to create experiences of drama or surprise and these designed settings may also be regarded as heritage

assets in their own right. Furthermore they may, themselves, have a wider setting; a park may form the immediate surroundings of a great house, while having its own setting that includes lines-of-sight to more distant heritage assets or natural features beyond the park boundary. Given that the designated area is often restricted to the 'core' elements, such as a formal park, it is important that the extended and remote elements of design are included in the evaluation of the setting of a designed landscape. Reference is sometimes made to the 'immediate', 'wider' and 'extended' setting of heritage assets, but the terms should be regarded as having any particular formal meaning. While many day-to-day cases will be concerned with development in the vicinity of an asset, development further afield may also affect significance, particularly where it is large-scale, prominent or intrusive. The setting of a historic park or garden, for instance, may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site's visual boundary.

Setting and Urban Design

The numbers and proximity of heritage assets in urban areas mean that the protection and enhancement of setting is intimately linked to townscape and urban design considerations, and often relate to townscape attributes such as lighting, trees, and verges, or the treatments of boundaries or street surfaces.

Setting and Economic and Social Viability

Sustainable development under the NPPF can have important positive impacts on heritage and their settings, for example by bringing an abandoned building back into use or giving a heritage asset further life. However, the economic and social viability of a heritage asset can be diminished if accessibility from or to its setting is reduced by badly designed or insensitively located development.

Landscape Assessment and Amenity

Analysis of setting is different from landscape assessment. While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance of a heritage asset, if at all. Careful analysis is therefore required to assess whether one heritage asset at a considerable distance from another, though intervisible with it – a church spire, for instance – is a major component of the setting, rather than just an incidental element within the wider landscape. Similarly, setting is different from general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting.

A Staged Approach to Proportionate Decision-taking

10. All heritage assets have significance, some of which have particular significance and are designated and the contribution made by their setting to their significance also varies. And, though many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset. This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change. It can also depend on the location of the asset: an elevated or overlooked location; a riverbank, coastal or island location; or a location within an

extensive tract of flat land may increase the sensitivity of the setting (ie the capacity of the setting to accommodate change without harm to the heritage asset's significance). This requires the implications of development affecting the setting of heritage assets to be considered on a case-by-case basis.

11. Protection of the setting of heritage assets need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development. Many places are within the setting of a heritage asset and are subject to some degree of change over time. NPPF policies, together with the guidance on their implementation in the Planning Policy Guidance (PPG), provide the framework for the consideration of change affecting the setting of undesignated and designated heritage assets as part of the decision-taking process (NPPF, Paragraphs 131-135 and 137).
12. Amongst the Government's planning objectives for the historic environment is that conservation decisions are based on the nature, extent and level of a heritage asset's significance and are investigated to a proportionate degree.

Historic England: Conservation Principles and Assessment (2008)

Conservation Principles (2008) explores, on a more philosophical level, the reason why society places a value on heritage assets beyond their mere utility. It identifies four types of heritage value that an asset may hold: aesthetic, communal, historic and evidential value. This is simply another way of analysing its significance. These values can help shape the most efficient and effective way of managing the heritage asset so as to sustain its overall value to society.

Evidential Value

35. Evidential value derives from the potential of a place to yield evidence about past human activity.
36. Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them. These remains are part of a record of the past that begins with traces of early humans and continues to be created and destroyed. Their evidential value is proportionate to their potential to contribute to people's understanding of the past.
37. In the absence of written records, the material record, particularly archaeological deposits, provides the only source of evidence about the distant past. Age is therefore a strong indicator of relative evidential value, but is not paramount, since the material record is the primary source of evidence about poorly documented aspects of any period. Geology, landforms, species and habitats similarly have value as sources of information about the evolution of the planet and life upon it.
38. Evidential value derives from the physical remains or genetic lines that have been inherited from the past. The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.

Historical Value

39. Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.
40. The idea of illustrating aspects of history or prehistory – the perception of a place as a link between past and present people – is different from purely evidential value. Illustration depends on visibility in a way that evidential value (for example, of buried remains) does not. Places with illustrative value will normally also have evidential value, but it may be of a different order of importance. An historic building that is one of many similar examples may provide little unique evidence about the past, although each illustrates the intentions of its creators equally well. However, their distribution, like that of planned landscapes, may be of considerable evidential value, as well as demonstrating, for instance, the distinctiveness of regions and aspects of their social organisation.
41. Illustrative value has the power to aid interpretation of the past through making connections with, and providing insights into, past communities and their activities through shared experience of a place. The illustrative value of places tends to be greater if they incorporate the first, or only surviving, example of an innovation of consequence, whether related to design, technology or social organisation. The concept is similarly applicable to the natural heritage values of a place, for example geological strata visible in an exposure, the survival of veteran trees, or the observable interdependence of species in a particular habitat. Illustrative value is often described in relation to the subject illustrated, for example, a structural system or a machine might be said to have 'technological value'.
42. Association with a notable family, person, event, or movement gives historical value a particular resonance. Being at the place where something momentous happened can increase and intensify understanding through linking historical accounts of events with the place where they happened – provided, of course, that the place still retains some semblance of its appearance at the time. The way in which an individual built or furnished their house, or made a garden, often provides insight into their personality, or demonstrates their political or cultural affiliations. It can suggest aspects of their character and motivation that extend, or even contradict, what they or others wrote, or are recorded as having said, at the time, and so also provide evidential value.
43. Many buildings and landscapes are associated with the development of other aspects of cultural heritage, such as literature, art, music or film. Recognition of such associative values tends in turn to inform people's responses to these places. Associative value also attaches to places closely connected with the work of people who have made important discoveries or advances in thought about the natural world.
44. The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of

people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value.

45. The use and appropriate management of a place for its original purpose, for example as a place of recreation or worship, or, like a watermill, as a machine, illustrates the relationship between design and function, and so may make a major contribution to its historical values. If so, cessation of that activity will diminish those values and, in the case of some specialised landscapes and buildings, may essentially destroy them. Conversely, abandonment, as of, for example, a medieval village site, may illustrate important historical events.

Aesthetic Value

46. Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place.
47. Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects – for example, where the qualities of an already attractive landscape have been reinforced by artifice – while others may inspire awe or fear. Aesthetic values tend to be specific to a time and cultural context, but appreciation of them is not culturally exclusive.
48. Design value relates primarily to the aesthetic qualities generated by the conscious design of a building, structure or landscape as a whole. It embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship. It may extend to an intellectual programme governing the design (for example, a building as an expression of the Holy Trinity), and the choice or influence of sources from which it was derived. It may be attributed to a known patron, architect, designer, gardener or craftsman (and so have associational value), or be a mature product of a vernacular tradition of building or land management. Strong indicators of importance are quality of design and execution, and innovation, particularly if influential.
49. Sustaining design value tends to depend on appropriate stewardship to maintain the integrity of a designed concept, be it landscape, architecture, or structure.
50. It can be useful to draw a distinction between design created through detailed instructions (such as architectural drawings) and the direct creation of a work of art by a designer who is also in significant part the craftsman. The value of the artwork is proportionate to the extent that it remains the actual product of the artist's hand. While the difference between design and 'artistic' value can be clear-cut, for example statues on pedestals (artistic value) in a formal garden (design value), it is often far less so, as with repetitive ornament on a medieval building.

51. Some aesthetic values are not substantially the product of formal design, but develop more or less fortuitously over time, as the result of a succession of responses within a particular cultural framework. They include, for example, the seemingly organic form of an urban or rural landscape; the relationship of vernacular buildings and structures and their materials to their setting; or a harmonious, expressive or dramatic quality in the juxtaposition of vernacular or industrial buildings and spaces. Design in accordance with Picturesque theory is best considered a design value.
52. Aesthetic value resulting from the action of nature on human works, particularly the enhancement of the appearance of a place by the passage of time ('the patina of age'), may overlie the values of a conscious design. It may simply add to the range and depth of values, the significance, of the whole; but on occasion may be in conflict with some of them, for example, when physical damage is caused by vegetation charmingly rooting in masonry. 53 While aesthetic values may be related to the age of a place, they may also (apart from artistic value) be amenable to restoration and enhancement. This reality is reflected both in the definition of conservation areas (areas whose 'character or appearance it is desirable to preserve or enhance') and in current practice in the conservation of historic landscapes.

Communal Value

54. Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values, but tend to have additional and specific aspects.
55. Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it. The most obvious examples are war and other memorials raised by community effort, which consciously evoke past lives and events, but some buildings and places, such as the Palace of Westminster, can symbolise wider values. Such values tend to change over time, and are not always affirmative. Some places may be important for reminding us of uncomfortable events, attitudes or periods in England's history. They are important aspects of collective memory and identity, places of remembrance whose meanings should not be forgotten. In some cases, that meaning can only be understood through information and interpretation, whereas, in others, the character of the place itself tells most of the story.
56. Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them. They tend to gain value through the resonance of past events in the present, providing reference points for a community's identity or sense of itself. They may have fulfilled a community function that has generated a deeper attachment, or shaped some aspect of community behaviour or attitudes. Social value can also be expressed on a large scale, with great time-depth, through regional and national identity.

57. The social values of places are not always clearly recognised by those who share them, and may only be articulated when the future of a place is threatened. They may relate to an activity that is associated with the place, rather than with its physical fabric. The social value of a place may indeed have no direct relationship to any formal historical or aesthetic values that may have been ascribed to it.
58. Compared with other heritage values, social values tend to be less dependent on the survival of historic fabric. They may survive the replacement of the original physical structure, so long as its key social and cultural characteristics are maintained; and can be the popular driving force for the re-creation of lost (and often deliberately destroyed or desecrated) places with high symbolic value, although this is rare in England.
59. Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of place. It includes the sense of inspiration and wonder that can arise from personal contact with places long revered, or newly revealed.
60. Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there.

Regional Policy

The London Plan Policies (Further Alterations to the London Plan (FALP) 2016)

In March 2016, the Mayor published (i.e. adopted) the Further Alterations to the London Plan (FALP). From this date, the FALP are operative as formal alterations to the London Plan (the Mayor's spatial development strategy) and form part of the development plan for Greater London.

The London Plan has been updated to incorporate the Further Alterations. It also incorporates the Revised Early Minor Alterations to the London Plan (REMA), which were published in October 2013 and March 2015.

Policy 7.8: Heritage Assets and Archaeology

Strategic

- A. London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.
- B. Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

Planning decisions

- C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- D. Development affecting heritage assets and their settings should conserve their significance by being sympathetic to their form, scale, materials and architectural detail.
- E. New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

Policy 7.9: Heritage-led Regeneration

Strategic

- A. Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration.

This includes buildings, landscape features, views, Blue Ribbon Network and public realm.

Planning decisions

- B. The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. 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.

Where a proposed scheme would affect the strategic views designed within **Policy 7.11 (the London View Management Framework)** of the London Plan, **Policy 7.12 (implementing the London View Management Framework)** stipulates that:

New development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the strategic views and their landmark elements. It should also preserve or enhance viewers' ability to recognise and to appreciate strategically important landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.

In regards to the foreground of a designated view, new development should:

...not be overly intrusive, unsightly or prominent to the detriment of the view

And development in the background of a view should:

...give context to landmarks and not harm the composition of the view as a whole. Where a silhouette of a World Heritage Site is identified by the Mayor as prominent in a Townscape or River Prospect, and well preserved within its setting with clear sky behind it, it should not be altered by new development appearing in its background. Assessment of the impact of development in the foreground, middle ground or background of the view or the setting of a landmark should take into account the effects of distance and atmospheric or seasonal changes.

The policies in the London Plan are informed by the **London Views Management Framework SPG (LVMF)**, which provides detailed guidance on the management of each designated view. These views are grouped into four categories: London Panoramas, River Prospects, Townscape Views and Linear Views. Where a proposed development would affect one or more view, the framework requires an applicant to include a description of each view and provide a justification of visual change.

The view relevant to this development comprises **View 16A, River Prospect: The South Bank**, which identifies Somerset House as its predominant feature in views across the Thames from outside the Royal National Theatre. Regarding background development, the LVMF states:

Development in the background of Somerset House should not dominate the landmark. Improvements to the setting of the landmark are encouraged through appropriate, high-quality design that respects Somerset House as the principal building in the view. The skyline of the view could be improved by new development of high architectural design quality in the background that respects the horizontal composition of the view and the dominance of Somerset House.

The **Guidelines for Landscape and Visual Impact Assessment (GLVIA)**, published in 2013, set out a framework for assessing the impact of new development on landscapes and on views. The guidelines can be applied both for Landscape and Visual Impact Assessments (LVIAs) that form part of an Environmental Impact Assessment (EIA), or as an appraisal of development proposals for town planning purposes.

The definition of landscapes set out in the GLVIA is broad, and includes rural landscapes, seascapes and townscape (GLVIA, paragraph 2.5).

The GLVIA sets out a suggested methodology for LVIAs, but makes it clear that this methodology is not prescriptive, stating that the approach and methodology adopted should be 'appropriate to the particular circumstances' of the proposal that is being assessed (1.20).

The GLVIA distinguishes between effects of development on two different elements, namely on **landscape as a resource**, and on **views and visual amenity**.

It sets out a suggested **key methodology** for LVIAs when they are standalone appraisals rather than part of an EIA, and these are in summary form (3.2):

- to specify the proposed change;
- to describe the effected landscape and views;

- to predict effects on the landscape and views (but not the significance of these effects);
- and to consider mitigation measures.

Local Policy

Camden Local Plan (2017)

The local plan was adopted by the Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough. **It includes the following relevant policies:**

Design

Policy D1 Design

The Council will seek to secure high quality design in development. The Council will require that development:

- respects local context and character;
- preserves or enhances the historic environment and heritage assets in accordance with "Policy D2 Heritage";
- is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- is of sustainable and durable construction and adaptable to different activities and land uses;
- comprises details and materials that are of high quality and complement the local character;
- integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- is inclusive and accessible for all;
- promotes health;
- is secure and designed to minimise crime and antisocial behaviour;
- responds to natural features and preserves gardens and other open space;
- incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- incorporates outdoor amenity space;
- preserves strategic and local views;
- for housing, provides a high standard of accommodation;
- and o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Tall buildings

All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to:

- how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;

- q. the historic context of the building's surroundings;
- r. the relationship between the building and hills and views;
- s. the degree to which the building overshadows public spaces, especially open spaces and watercourses; and
- t. the contribution a building makes to pedestrian permeability and improved public accessibility.

In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability.

Public art

The Council will only permit development for artworks, statues or memorials where they protect and enhance the local character and historic environment and contribute to a harmonious and balanced landscape design.

Excellence in design

The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under "Policy G1 Delivery and location of growth" will be provided through high quality contextual design.

Policy D2 Heritage

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designated heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's

conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;
- j. 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; and
- k. resist development that would cause harm to significance of a listed building through an effect on its setting.

Kingsway Conservation Area Statement (2001)

The Kingsway Conservation Area Statement provides a number of relevant insights into the character of the area. The extracted guidelines included below date to 2001 and make some references to outdated policies, but are still referenced in the assessment of current planning applications.

Sardinia Street to Remnant Street

Two listed phone boxes mark the southern boundary on Sardinia Street outside the Public Trust Office, a building that has a discreet style and clean lines. Cast iron railings create the boundary with the pavement. The distinctive Kodak House No. 63 Kingsway; a Portland stone building establishes the scale of Kingsway when approached from the south. The building has classic simplicity but has decorative detail to the roof and superb bronze entrance doors. Pevsner in 1957 noted it as "the only building of architectural importance in Kingsway. For here is an early example of a commercial building to which the future belonged".

CAA House nos. 45-59 Kingsway is an isolated 1960s building by R.Seifert and Ptnrs. The front to Kingsway is the only part in the Conservation Area. It sits fairly easily with its Edwardian neighbours, helped by the continuation of the street trees.

Nos. 40 & 42 Kingsway is an eight storey building on the east side (1908-9) by Edwin Lutyens in Portland stone with rusticated ground, first and second floors. Nos. 44 & 46, Kingsway Chambers, is a narrow fronted

building which could be described to have a Flemish influence, but described under its listing as in Arts & Crafts manner. Pevsner describes it as "Art Nouveau Gothic".

On the west side Nos. 77-97 Kingsway has been redeveloped with the retention of the original façade designed by Norman and Trehearne. New shopfronts have been installed that are sympathetic in their design to the original building.

On either side of this linear road the side streets provide breaks in the facades and glimpses of adjacent areas. Remnant Street and Sardinia Street give glimpses through to Lincoln's Inn Fields. Wild Court and Keeley Street and Great Queen Street lie at an angle to Kingsway, slightly southwards.

Wild Court is narrow with six storey buildings on either side. Kodak House on the south opposite Wesley House, by Gordon and Kingsway 11 Kodak House Kingsway Chambers Gunton, red brick with stone dressings, built as a Wesleyan Mission Centre in 1910, it provides contrast in materials to the stone of Kingsway and has a Palladian window on the first floor. For over 80 years it was home for one of London's first creche facilities.

Townscape/Landscape Kingsway is a bold set piece of townscape with its southwards vista terminated by Bush House. The regularly spaced plane trees, on either side, were originally planted when the street was laid out. They provide an important foil to the monumentality and regularity of the building facades and together with the buildings create a boulevard effect and a pleasing homogeneous character. However, the greening effect on this heavily trafficked street has been reduced over the years.

Views

Because Kingsway was superimposed upon an existing street pattern there are numerous views to a varied hinterland of different age, pattern and scale. Perhaps surprisingly these views include glimpses of major green spaces. They also provide views of the contrasting surrounding areas of Covent Garden, Bloomsbury and Lincoln's Inn. These contrasting views reinforce Kingsway's particular character and provide interest and relief.

Kingsway: view south, tree lined vista terminated by Bush House

Kingsway/Kemble Street: view west to yellow brick housing blocks

Kingsway/Wild Court: view west

Negative Features

Shop Fronts At ground floor level the Shop Fronts play an important part in the character of the street. Many shopfronts have been installed that fail to utilise the original framing. The buildings were designed with shopfronts and this element should be recognised in new designs.

Roof Extensions The buildings although individually designed have unity in their form with minor variations in the roof design. Many have a cascade of multi-storied dormers. They may have decorative features. Some extensions have failed to contribute to the character of the roofline.

Loss of Original Detail There are many architectural elements that contribute to the distinct character of Kingsway. Alterations, even minor ones, have resulted in the loss of detail and have harmed the Conservation Area. In particular windows and doors are of enormous importance and their replacement should be carefully considered.

Current Issues

The Kingsway Conservation Area has retained much of its original character and appearance, although there is constant development pressure because of its importance as a commercial activity area with Holborn and the Aldwych.

The relationship between the shops and commercial premises are of particular concern within the Conservation Area. Some insensitive change has occurred along these frontages and many of the existing shopfronts and their signage are not of great merit, however their setting within the mainly large Portland stone buildings are paramount to the preservation and the enhancement of the Conservation Area. It being a commercial area there is pressure for fascia and projecting illuminated advertising. The demand for shop units and apparent regularity of shop tenants changing hands has meant that the problem needs to be constantly monitored. It also means there is likely to be the opportunity for improvement in the quality of shopfronts.

The Conservation Area is predominantly a homogeneous collection of turn of the century individual Portland stone buildings that together create its unique character. Many of the buildings are listed or are identified as making a positive contribution. Proposed roof extensions could be a cause for concern because of the effect the proposal would have on the individual building as well as setting an overall precedent within the streetscene and Conservation Area. Incremental roof additions, such as air-conditioning and other plant continue to be a concern.

There are a considerable number of listed buildings within the Conservation Area and therefore, even minor works are likely to require listed building consent. Most other buildings within the Conservation Area are considered to make a positive contribution, but are not listed, and therefore there is a great danger that minor works would have a cumulative harmful effect on the character and appearance of the Conservation Area.

The area is within Camden's Clear Zone region. The Clear Zone concept is to create areas where to create areas where traffic congestion and environmental pollution are minimised and access and vitality are maximised, by making imaginative use of existing technology and by developing new techniques and products, tailor made for sustainable futures. Examples of Clear Zone components include the creation of traffic reduced areas linked with the encouragement of car free housing and the development of Green Travel Plans. Camden is currently working with Westminster City Council to develop a traffic management scheme for Covent Garden which will seek to remove through traffic from Covent Garden to the west of Kingsway.

Guidelines

Design

K2 The predominant architecture of the Conservation Area is from the early 20th century and many good examples remain. As a result the area has a consistent scale and character, apart from the side streets. New design should respect this character and make a positive contribution to it.

Roof Extensions

K24 Planning permission is required for alterations to the roof, at the front, rear and side, within the Conservation Area. In general, the rooflines of the 20th century buildings are unspoilt and form a very prominent characteristic of the conservation area. Despite some existing mansard extensions, roof extensions which fundamentally alter the roof form of buildings will not normally be permitted, although each proposal will be considered on its own merits. Particular care should be taken in the siting of roof top plant. This should be properly integrated into the roof form of buildings given the importance of the roofscape character in views. In all cases guidance in the SPG should be considered before preparing roof extension schemes.

Rear Extensions

K25 Rear extensions should be as unobtrusive as possible and should not adversely affect the character of the building or the Conservation Area. The proposals general effect on neighbouring properties and Conservation Area will be the basis of its suitability.

K26 Within the terrace or group of buildings what is permissible will depend on the original historic pattern of extensions. Rear extensions will not be acceptable where they would spoil a uniform rear elevation of an unspoilt terrace or group of buildings.

Traffic Parking and the Public Realm

K33 Most streets in the area are heavily parked and there is unlikely to be any scope for additional off street parking (refer SPG). On redevelopment off street servicing will be required.

K34 The Council Environment Committee agreed a policy for street maintenance/materials in July 1995 which seeks to maintain a high level of quality for the street environment. It is important that the need to preserve and enhance the historic character of the Conservation Area is recognised in the design and siting of all street furniture, including statutory undertakers and other services equipment and paving material. The Council will make efforts to avoid any unnecessary visual clutter whilst seeking design solutions appropriate for the area in line with recommendations in PPG15 (paras. 5.13 -5.18) and English Heritage Guidance "Street Improvements in Historic Areas".

K35 The Council will maintain a high standard of street furniture within the Conservation Area that takes into consideration the historic fabric of the area.

K36 Some side streets have very narrow footways. On redevelopment the Council will insist on minimum widths given in Design Standards e.g. Planning permission granted for Northgate House, Remnant Street has a ground floor set back.

City of Westminster Unitary Development Plan (2007 – Parts saved 2010)

The following relevant policies comprise guidance on the impact of development on conservation areas in the City of Westminster.

POLICY DES 9: CONSERVATION AREAS

(A) Applications for outline planning permission in conservation areas.

In the case of outline planning applications within designated conservation areas it may be necessary to require additional details to be produced in order that the physical impact of the proposed development may be fully assessed.

(C) Planning application for alteration or extension of unlisted buildings

Planning permission will be granted for proposals which:

- 1) Serve to reinstate missing traditional features, such as doors, windows, shopfronts, front porches and other decorative features
- 2) Use traditional and, where appropriate, reclaimed or recycled building materials
- 3) Use prevalent facing, roofing and paving materials, having regard to the content of relevant conservation area audits or other adopted supplementary guidance
- 4) In locally appropriate situations, use modern or other atypical facing materials or detailing or innovative forms of building design and construction

(F) Setting of conservation areas

Development will not be permitted which, although not wholly or partly located within a designated conservation area, might nevertheless have a visibly adverse effect upon the area's recognised special character or appearance, including intrusiveness with respect to any recognised and recorded familiar local views into, out of, within or across the area.

(G) Restrictions on permitted development in conservation areas

1) In order to give additional protection to the character and appearance of conservation areas, directions may be made under article 4(2) of the Town and Country Planning (General Permitted Development) Order 1995. Types of generally permitted development to which such directions may apply will include:

- a) painting, cladding or rendering of building facades
- b) insertion or replacement of doors and windows
- c) removal or replacement of boundary walls and fences
- d) alteration of roof profiles and replacement of roofing materials.

2) Such added powers of planning control may be applied to designated conservation areas the subject of adopted conservation area audits or to buildings or groups of buildings therein identified as being of architectural, historical or topographical interest.

3) The existence of such directions will be taken into account in the authorisation of development that may itself be made subject to the removal of permitted development rights, in appropriate individual cases.

POLICY DES 15: METROPOLITAN AND LOCAL VIEWS

Permission will not be granted for developments which would have an adverse effect upon important views of

- (A) listed buildings
- (B) landmark buildings
- (C) important groups of buildings
- (D) monuments and statues
- (E) parks, squares and gardens
- (F) the Grand Union and Regent's Canals.
- (G) the River Thames.

Westminster's City Plan: Strategic Policies (2016)

Westminster's City Plan: Strategic Policies was formally adopted by Full Council on 13 November 2013 and re-confirmed in November 2016, and has full weight as part of the development plan in taking planning decisions from that date. This document was the result of a review of the City Council's Core Strategy adopted in January 2011 to ensure consistency with the Government's National Planning Policy Framework (NPPF), the new London Plan published by the Mayor of London in July 2011, changes to legislation, and other updates.

The following relevant policies comprise those pertaining to Westminster conservation areas:

POLICY S25 HERITAGE

Recognising Westminster's wider historic environment, its extensive heritage assets will be conserved, including its listed buildings, conservation areas, Westminster's World Heritage Site, its historic parks including five Royal Parks, squares, gardens and other open spaces, their settings, and its archaeological heritage. Historic and other important buildings should be upgraded sensitively, to improve their environmental performance and make them easily accessible.

Reasoned Justification

The intrinsic value of Westminster's high quality and significant historic environment is one of its greatest assets. To compete effectively with other major, world-class cities the built environment must be respected and refurbished sensitively in a manner appropriate to its significance. Any change should not detract from the existing qualities of the environment, which makes the city such an attractive and valued location for residents, businesses and visitors.

POLICY S26 VIEWS

The strategic views will be protected from inappropriate development, including any breaches of the viewing corridors. Similarly, local views, including those of metropolitan significance, will be protected from intrusive or insensitive development. Where important views are adversely affected by large scale development in other boroughs, the council will raise formal objections. Westminster is not generally appropriate for tall buildings.

Reasoned Justification

Views of buildings and landscapes are an essential part of Westminster's unique heritage. They can be seriously damaged by insensitive development in the foreground or background. Westminster is very sensitive to impacts from tall buildings within the borough or adjacent boroughs by virtue of the disproportionate impact they can have on important views, the skyline and to Westminster's heritage assets.

Tall buildings are also addressed specifically in relation to Westminster's Opportunity Areas: Paddington Opportunity paragraph 3.14 and Policy S3; Victoria Opportunity Area paragraph 3.19 and Policy S4; Tottenham Court Road Opportunity Area paragraph 3.23. Detailed policy criteria for tall buildings will be included in City Management policy.

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