

Our Project Ref: SHK

21st July 2023

Laura Dorbeck (Planning Officer) and Rose Todd (Design and Conservation Officer)
London Borough of Camden Planning and Conservation
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Sent by Email

Dear Laura and Rose,

Introduction

This note is to accompany Squire and Partners' drawings and the 'Space House Planning Condition Discharge Report Condition 3LBC m)', dated July 2023, which seeks to amend the condition approved on the 12 December 2022 under application ref. 2022/4463/L. This approved condition is pursuant to listed building consent ref: 2022/3271/L, dated 8 September 2022 in relation to the approved development at Space House (refs: 2021/1058/P and 2022/3271/L). This letter follows a previous letter dated 17th November 2022; this letter addresses proposed amendments to the essential lightning protection, amendments which are considered to be less intrusive and an improvement on the previous proposals. Planning Condition 3LBC m) is as follows:

"Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:

m) All new services, including BWIC, risers, pipework, cabling, air handling equipment, extracts, louvres, sprinklers, health and safety equipment, and communications technology equipment. The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works."

Lightning Protection Details to be Discharged by Condition 3LBC m)

The Kingsway building already has sufficient existing lightning protection and the works proposed therefore relate only to the Tower. The Tower building requires the installation of essential lightning protection equipment in order to protect it in case of a lightning strike. The consented design proposed to use the steel structure to conduct lightning, however during the detailed design stage it has become clear that the existing rebar structure does not provide a path to ground.

The previously submitted condition discharge proposals required the installation of twelve 8mm wide rods stretching from the roof down the façade of the building to level 2. The rods would have a PVC cover in a silver/grey colour, mimicking the colour of the concrete closely to reduce visibility as much as possible. The locations of the rods are shown on plan in Fig. 2.0.1 in Squire's document. This proposal will remain as before however the change and improvement comes at level 1. The lightning rod will now terminate at the bottom of the level 1 windows, entering through the window mastic, connecting to the structural slab rebar and the earthing pits at basement level, removing the need to wrap the lightning rod around the existing ring beam. This also negates the need for a connection point to the Y-columns. The previous proposals saw the rods positioned on the Y columns centres, the visual impact mitigated by ensuring the rods followed the centre of the cruciform along the mortar joints as far as possible down the expressed structure of the building and under the soffit of level 2. The visual impact would be completely removed at level 1, the ring beam remaining

uncluttered, and the new proposals offer an improvement on the previous proposals being less visually intrusive at a lower level.

The proposed amendments to the essential lightning protection equipment have been presented to Camden planning and conservation officers in the Post-Approval Agreement (PAA) meeting held on the 3rd May 2023. Officers confirmed at this time that the amendments were acceptable in principle.

Conclusion

To ensure the Tower building complies with British Standards for lightning protection (BS EN 62305) the only satisfactory solution from both a safety point of view, building regulations and the insurers of the building is the installation of the 12 rods as summarised in this letter. This is essential work for the building which would result in some minor visual impact; this visual impact would be mitigated as far as possible through positioning and colour of the PVC covering to the rods. A number of different options have been explored by the design team, and these were submitted as part of the previously approved submission. The amended proposal goes one step further in reducing visual impact at lower level and is considered to be the most appropriate in terms of sensitivity to the special interest of the listed building and acceptability in safety and insurance terms.

Overall, these essential proposals, which have been discussed and finalised through pre-application discussions with Camden planning and conservation officers, would substantially preserve the special interest of the listed building and the character and appearance of the conservation area in accordance with Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act. The proposals would comply with the relevant policies of the NPPF, namely para 206, and all other relevant strategic policies of Camden's Local Plan, notably D2 Heritage and the London Plan (2021) Policy HC1 insofar as they relate to the historic environment.

Yours sincerely,



Joanna Kelly IHBC

Associate

For and on behalf of Donald Insall Associates