

Application ref: 2024/0705/P  
Contact: Alex Kresovic  
Tel: 020 7974 3134  
Email: [Alex.Kresovic@camden.gov.uk](mailto:Alex.Kresovic@camden.gov.uk)  
Date: 22 May 2024

**Development Management**  
Regeneration and Planning  
London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1H 9JE

Phone: 020 7974 4444

[planning@camden.gov.uk](mailto:planning@camden.gov.uk)  
[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Westminster City Council  
Town Planning & Building Control  
City of Westminster  
PO Box 732  
Redhill, RH1 9FL

Dear Sir/Madam

## **DECISION**

Town and Country Planning Act 1990 (as amended)

### **Request for Observations to Adjoining Borough - Objection**

Address:  
**22 Kingsway**  
**Kingsway**  
**London**

Proposal:

Use of part of basement and ground to seventh floor as student accommodation (Sui Generis) and two retail units (Class E) at ground level; removal of roof slab and replacement of eighth floor structure and construction of a two storey vertical extension providing further student accommodation (Sui Generis); external alterations including partial façade replacement and new/rearranged entrances and retail frontages; cycle parking; soft landscaping on roof and terraces; roof plant and solar panels; and all associated engineering and ancillary works.

Drawing Nos:

City of Westminster Cover Letter, ref: 24/00898/FULL.

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises objection for the following reason(s):

Reason(s) for Objection

Informative(s):

## 1 Reasons for raising objection:

The subject application relates to the remodelling of a 1960s building for use as student accommodation and GF retail. Works involve façade replacement and a two- storey roof level extension, and new/rearranged entrances and retail frontages to the GF.

The provided application package of documents appears incomplete and missing information and key assessment/detail, including:

- Proposed West Elevation Drawing (Front Elevation to Kingsway)
- Heritage Statement and Visual Assessment - pgs. 8-23, Chapters 4-8 missing
- Acknowledgement of the contextual relationship to the Bloomsbury CA (DAS pg. 19)
- Assessment of the impact and relationship to Space House and Lincoln's Inn Fields
- Material specification details and contextual analysis
- Roof Level plant equipment detail (dimensions etc.) - plant not shown on the proposed elevations or in perspectives

Provision of the above missing information, further detail and documents would allow for a more accurate and complete assessment of the effects of the proposed development.

Notwithstanding the above, based on the information provided, the proposed development raises a number of concerns from a heritage and conservation perspective, in relation to the treatment of the rebuilt façades and two-story roof level additions.

The building is located in the London Borough of Westminster which shares a north/south boundary with Camden and the southern edge of both Camden's Kingsway and Bloomsbury Conservation Areas. The building forms part of the backdrop and townscape of a number of identified views of key significance to the CAs, specifically south along Kingsway towards Bush House and east from Kingsway down Sardinia Street and into Lincoln's Inn Fields. The site is also directly adjacent to and in the immediate setting of a number of listed buildings including Kodak House, Space House, and Lincoln's Inn Fields.

The proposed developments to 22 Kingsway therefore have the potential to have harmful impacts on Camden's designated and undesignated heritage assets.

As existing, the materiality and fenestration treatment of the building's façade is typical of its modernist typology, and along with the adjacent Space House, has collective historic interest for being representative of the 1960s commercial property boom. The building has curtain wall façades with steel framed windows and dark green spandrel panels that are set between masonry piers and two solid end panels presenting to Kingsway.

- ## 2
- A key view of significance to the Kingsway CA is noted to be the southward view along the linear road that terminates at Bush House. The Kingsway CA Appraisal and Management Strategy states:

"Kingsway is a bold set piece of townscape with its southwards vista terminated by Bush House... [The trees] 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."

Space House and 22 Kingsway provide a mirror of modernist bookends marking the boundary between the two Boroughs, as well as the Kingsway and Strand Conservation Areas. The complementary materiality, colour of the spandrel panels, solid-to-void ratio and reflectivity of the glazing, and uniform division pattern link the two buildings and provide a distinctive pocket of 1960s modernism that adds to the townscape context.

As proposed, the revised articulation of the façade treatment and materials result in a loss in fenestration rhythm, and increase in the solidity to the façade - specifically on the northern Sardinia Street façade. The reduction in glazing and lightweight nature of the Sardinia elevation would be highly visible in the context of Space House, from Lincoln's Inn Fields, and in Kingsway views - this is demonstrated in the Visual Impact Assessment (Views 1, 2, 3 and 11).

Little detail has been provided about the proposed material treatment of the spandrel panels or the rooftop addition's cladding. Camden would be concerned that these details ensure the building does not detract from or become a dominant form in the historic context.

As proposed, the two-story extension to the building would be visible in key views in and out of the Kingsway and Bloomsbury Conservation Areas, and also from within the Grade II Listed Lincoln's Inn Fields Park & Garden. The additional height and bulk would contribute to the further enclosure and development density surrounding Lincoln's Inn Fields and would also cut into long views of Space House. The views provided in the Visual Assessment application package do not adequately demonstrate how the building would present in the wider context of the Conservation Areas and the setting and relationship with the surrounding Listed Buildings.

The principle of the two-story extension may be acceptable given the surrounding context of taller development, however it is unclear if the proposed plant equipment has been included in the provided elevations. Further projection above the parapet height of the additional storey may contribute to clutter to the roofscape, specifically in long views across Lincoln's Inn Fields.

The Council therefore has concerns that the additional height and mass of the upper extensions and rebuilding of the façades would adversely impact the identified significant views and townscape context of the Kingsway and Bloomsbury Conservation Areas, the setting of the listed park and garden (Lincoln's Inn Fields), and the relationship to and setting of the listed building (Space House).

When considered cumulatively, the developments to 22 Kingsway could result in harm to Camden's designated and non-designated heritage assets. A more considered approach to the sensitive historic context for the proposed façade treatment would help alleviate concerns, with more detail and specification.

The missing information in the document package should be provided so that the full impact of works can be accurately assessed.

Yours faithfully

A handwritten signature in black ink, appearing to read 'DP', is centered on the page. The signature is fluid and cursive.

Daniel Pope  
Chief Planning Officer