



GERALDEVE

Town Planning Statement

Space House, 1 Kemble Street and 43-59 Kingsway, London,  
WC2B 4TS

On behalf of: SLQR Trustee No 1 Limited and SLQR Trustees No 2  
Limited as Co Trustees for SLQR Unit Trust No 3

Date 24 May 2019

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# 1 Executive Summary

- 1.1 The proposals within this application for planning permission and listed building consent, brought forward by Seaforth Land (on behalf of SLQR Trustee No.1 Limited SLQR Trustee No.2 Limited as co-trustees of SQLR Trustee No.3: (the 'Applicant'), will provide an exciting opportunity to regenerate this Grade II listed site by delivering a high quality, contextual and sustainable, mixed use office-led scheme.
- 1.2 The site comprises two buildings – an 8-storey block facing Kingsway and a 17-storey tower directly behind and connected by a pedestrian link bridge at first and second floors. Two basement levels span the entire site.
- 1.3 The buildings are outdated and offer significant scope for improvement both internally and externally, including the lacklustre public realm. Architects Squire & Partners along with their design team have spent the past 9 months designing a sensitive and contextual refurbishment and extension scheme to preserve and enhance the listed building for continued class B1 office use, whilst introducing a range of flexible uses at ground floor and basement levels to activate the site.
- 1.4 The proposals offer the opportunity to deliver increased, efficient, flexible office floorspace, along with class A1/A3 retail across the ground floors and flexible business (class B1) and business/events space (sui generis) at basement level. Landscape architects Gustafson Porter & Bowman have designed proposals to significantly enhance the public realm through hard and soft landscaping to create a place that attracts pedestrians to both cross through and linger.
- 1.5 The scheme will deliver a number of benefits including –
  - Enhanced public realm with vibrant and active frontages;
  - Refurbishment of two listed buildings to ensure their longevity and vitality;
  - Contextual, high quality extensions to both buildings to provide new class B1 office floorspace;
  - Removal of car parking and provision of cycle parking and end of journey facilities in accordance with the draft London Plan;
  - Removal of unsightly rooftop plant visible in long views and provision of energy efficient plant and sustainability features within a plant enclosure.

- 1.6 The development will make a significant contribution to both Camden and London through maximising the potential opportunity of the site, providing appropriate links to and benefits for the surrounding area and existing communities and will accord with the Council's aspirations and objectives for the wider area.

## 2 Introduction

2.1 This Town Planning Statement is submitted in support of a detailed planning application made on behalf of the Applicant, SLQR Trustee No.1 Limited SLQR Trustee No.2 Limited as co-trustees of SQLR Trustee No.3, for the remodelling, refurbishment and extension of the site at Space House, 1 Kemble Street and 43-59 Kingsway, London, WC2B 4TS ('the site'). This statement sets out the town planning case in support of the application. It summarises the planning history of the site and assesses the proposed development in the context of relevant planning policies and guidance.

2.2 The proposals are described in greater detail in the Development Proposals section of this statement. In summary, planning permission is sought for the:

**“Removal of existing roof plant equipment at 1 Kemble Street and erection of a single storey facsimile floor plus one setback floor; removal of roof plant from 43-59 Kingsway and erection of a single storey set-back extension; enclosure of the southern external stair at ground floor level on Kingsway with slimline glazing replacement windows and new glazing at ground floor level across the site; enclosing the redundant petrol filling station area with slimline glazing; façade cleaning; new landscaping and public realm works and internal alterations to both buildings in connection with their refurbishment and change of use from Class B1 offices to Class A1/A3 and flexible Class B1/B1 and events space (sui generis) at part ground and basement levels.”**

2.3 This planning statement is structured as follows:

- Section 3 – description of the site and surroundings;
- Section 4 – details of the site's background and planning history;
- Section 5 – details of the development proposals;
- Section 7 – relevant planning policy framework;
- Sections 8-14 – assessment of the material planning considerations arising from the application proposals; and
- Section 15 – summary and conclusions.

2.4 The proposed works, designed by Squire & Partners, are described in Section 5 of this statement and within the submitted Design and Access Statement. This statement should be read in conjunction with the proposed plans and drawings, prepared by Squire & Partners, and the following documents which are submitted as part of this application:

- Application Forms and Certificates;
- Site and Location Plans;
- Community Infrastructure Levy form;
- Design and Access Statement (including a crime impact assessment), prepared by Squire & Partners;
- Existing plan, section and elevation drawings, prepared by Squire & Partners;
- Demolition plan, section and elevation drawings, prepared by Squire & Partners;
- Proposed plan, section and elevation drawings, prepared by Squire & Partners;
- Heritage Assessment (including Schedule of Works), prepared by Donald Insall Associates;
- View Analysis, prepared by Donald Insall Associates;
- Town Planning Statement (including draft Heads of Terms), prepared by Gerald Eve LLP;
- Sunlight Daylight Report, prepared by Point 2 Surveyors;
- Energy and Sustainability Statement (including BREEAM), prepared by RES;
- Sustainable Drainage Systems (SuDS) Strategy, prepared by Pell Frischmann;
- Framework Travel Plan, prepared by Caneparo Associates;
- Transport Assessment, prepared by Caneparo Associates;
- Delivery and Servicing Management Plan, prepared by Caneparo Associates;
- Structural Report, Pell Frischmann;
- Odour Risk Assessment, Long and Partners;
- Draft Construction Management Plan, prepared by Aecom;
- Waste Management Plan, prepared by Aecom;
- Statement of Community Involvement, prepared by London Communications Agency;

- Landscaping Strategy (including Lighting Strategy), prepared by Gustafson Porter and Bowman;
  - Framework Operational Management Plan, prepared by Seaforth Land; and
  - Environmental Noise Survey Report, prepared by Hann Tucker.
- 2.5 This statement sets out the town planning assessment of the proposed scheme and assesses it in the context of national, regional and local planning policy and guidance.
- 2.6 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act (2004) against which development within the London Borough of Camden (LBC) must be assessed comprises: the London Plan, being the Spatial Development Strategy for Greater London, adopted by the Mayor in July 2011, revised in 2016 and Camden's Local Development Framework (LDF). The LDF consists of Camden's Local Plan (2017), Camden Planning Guidance, Site Allocations Supplementary Planning Documents (SPD), Kingsway Conservation Area Statement (2001) and the Proposals Map.
- 2.7 Section 3 of this statement goes on to consider the application site and its surroundings area in greater detail.

### 3 Site and Surroundings

- 3.1 The application site is in the London Borough of Camden (LBC). The Site comprises a 17-storey cylindrical building with rooftop plant equipment (1 Kemble Street) which is connected at first and second floor levels by a pedestrian link bridge to a ground plus 7 storey building (43-59 Kingsway) which fronts onto Kingsway.
- 3.2 The two blocks are also connected by two subterranean levels forming a large underground car park equipped with a small on-site filling station (now redundant).
- 3.3 Space House was built in 1964-8 as designed by 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-based property tycoon Henry Hyams. The building has historic interest for its tripartite connection with Marsh, Seifert and Hyams, one of the most successful developer-architect partnerships operating in London in the 1960s; the partnership that was concurrently working on Centre Point (now Grade II listed): one of London's earliest skyscrapers.
- 3.4 Space House became Grade II listed in 2015. A full listing description is included in the Historic Building Report by Donald Insall Associates. The reasons for the site's listing are as follows:

**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”;* and

**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”.*

- 3.5 Certain, largely internal, elements of the Site are not included within the listing and as such are not granted the same level of protection as the rest of the built fabric at the Site. Just like Centre Point, Space House remained un-let for the first 7 years of its



life post-completion, until a deal was struck with the Civil Aviation Authority in 1975, who renamed the site Civil Aviation Authority House (CAA House).

- 3.6 In terms of other designated heritage assets, 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 site is also within the setting of a number of other listed buildings, including the Grade II-listed Kodak House opposite Keeley Street; the Grade II\* Connaught Rooms immediately north of this; the Grade II\* Freemasons Hall to the northwest of the site; the Grade II-listed Bruce House to the south; and the Grade II-listed Kingsway Chambers and 40-42 Kingsway to the northeast.
- 3.7 In terms of local townscape, the heights of the surrounding buildings vary between 5 and 8 storeys, with the tower - 1 Kemble Street - being the tallest building in the immediate area.
- 3.8 In terms of land use, the surroundings are largely commercial comprising of retail and offices but also educational facilities, with City Lit located opposite the site. To the south is the Peabody residential estate.
- 3.9 The site is a 5-minute walk from Holborn Underground Station (to the north) and a 10-minute walk from Temple Underground Station (to the south) and Covent Garden (to the west) and benefits from the highest PTAL rating of 6b, denoting it as highly accessible.
- 3.10 The administrative boundary between the LBC and Westminster City Council ('WCC') lies directly to the south of the Site along Wild Street and Kemble Street.

## 4 Planning History

- 4.1 The majority of the Site's planning history is contained to the 1970s prior to the building becoming listed, and largely relates to the uses within the buildings.
- 4.2 On 3 July 1975 planning permission (ref: 20841) was refused for **“change of use of 33,633 sq.ft. of vacant showrooms on the ground and first floors of the rectangular block fronting Kingsway, and the first and second floors of the circular tower block to the rear to offices.”** The reasons for refusals were cited as: 1) the proposed use for office purposes does not conform with the provisions of the Initial Development Plan in which the area is zoned for West End purposes with a shopping frontage; and 2) the proposed development involves an increase in office accommodation contrary to the Council's policy of restricting growth of such space in Central London.
- 4.3 On 8 January 1976 planning permission (ref: 21386) was granted for **“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.”** Condition 1 of this planning permission states **“permission shall be personal to the Civil Aviation Authority during their occupation and shall not enure for the benefit of the land and is in addition to the authorised use of the premises for showroom purposes”**.
- 4.4 We understand that the personal element of planning permission (ref: 21386) was removed in 1990 via an appeal against non-determination.
- 4.5 On 24 September 1976 planning permission (ref: 23022) was approved for **“The extension of the existing walkway at roof level to form a viewing platform”**.
- 4.6 On 21 April 1978 planning permission (ref: 25118) was refused for **“Use of ground floor front of the Kingsway Block (nos.45-59 Kingsway), which is vacant, as offices and library.”** The reasons for refusal were cited as follows: 1) the proposed development involves an increase in office accommodation contrary to the Council's policy of restricting growth of such space in Central London; and 2) it is considered

that the use of the ground floor as proposed would have a detrimental effect on the visual interest and character of Kingsway and that it would not contribute a use of interest or service to the general public using the street.

- 4.7 On 17 April 1998 planning permission (ref: PS9705187R1) was approved for **“Enclosure of external fire escape”**.
- 4.8 On 14 March 2000 planning permission (ref: PSX0004091) was approved for a **“new entrance and extended canopy on Kingsway frontage”**.
- 4.9 Several applications for planning permission relating to alterations to the building for plant, telecommunication equipment and pedestrian and vehicle access have been made.

#### **Surrounding area**

- 4.10 The Site is located in an area undergoing significant investment and change. Several major planning permissions have been granted in the local area which demonstrates that the area is delivering mixed-use developments and transforming to provide a destination in Camden where users can live, work and play.
- 4.11 On 23 November 2017, planning permission (ref: 2017/1611/P) was approved at 4 Wild Court & 75 Kingsway for **“Change of use from private college (Class D1) on Wild Court and retail unit (Class A1) on Kingsway and erection of new 7th and 8th floor roof extensions to provide a new 3909sqm (GIA) 211 bedroom hotel (Class C1), plus reinstatement of commercial entrance and ancillary café onto Kingsway, and new plant and PV panels on roof”**.
- 4.12 In WCC, planning permission (ref: 18/07715/FULL) at was approved at Development Site At Land Bounded By Drury Lane, Dryden Street, Arne Street And Shelton Street London on 13 February 2019 for **“Removal of existing third and fourth floor levels and roof top structures and partial demolition of Shelton Street elevation (third floor only); construction of new floorspace and internal reconfiguration resulting in a part five and part six storey building with roof top plant enclosure, to provide flexible commercial use including retail (Class A1), financial and professional services (class A2) restaurant (class A3), office (class B1) and /or assembly and leisure (class D2) at basement and ground floor level and office**

**use (Class B1) at first to fifth floor levels; refurbishment of external elevations; roof terraces, plant, cycle parking and facilities for access and servicing”.**

## 5 Development Proposals

- 5.1 This application seeks planning permission and listed building consent for the following proposed development:

**“Removal of existing roof plant equipment at 1 Kemble Street and erection of a single storey facsimile floor plus one setback floor; removal of roof plant from 43-59 Kingsway and erection of a single storey set-back extension; enclosure of the southern external stair at ground floor level on Kingsway with slimline glazing replacement windows and new glazing at ground floor level across the site; enclosing the redundant petrol filling station area with slimline glazing; façade cleaning; new landscaping and public realm works and internal alterations to both buildings in connection with their refurbishment and change of use from Class B1 offices to Class A1/A3 and flexible Class B1/B1 and events space (sui generis) at part ground and basement levels.”**

- 5.2 In preparing the proposals, the Site was appraised in order to identify its constraints and the opportunities for improvement presented by development. The existing Site issues identified are:

- i. dead frontage and poor, unwelcoming public realm throughout;
- ii. outdated office space;
- iii. unmaintained listed fabric;
- iv. poor servicing strategy; and
- v. poor rooftop plant configuration creating a broken roofscape.

- 5.3 Based on the issues identified, the following are considered important opportunities to improve the Site and deliver significant public benefits to both the Site and the surrounding area:

- i. open up the Site to the public by introducing flexible retail at ground floor;
- ii. provide active frontage through the introduction of flexible retail uses at ground floor to animate the Kingsway block and provide increased levels of natural surveillance and delivering an animated and vibrant retail environment;
- iii. refurbishment of the tired office floorspace to deliver high quality modern offices;

- iv.refurbishment of the listed fabric to secure the Site in its optimum viable use for the long-term;
- v. improve the public realm design and user experience;
- vi. improve the servicing strategy; and
- vii.improvement to the roofscape through realignment of plant and sensitive, proportionate rooftop extensions to both the tower and Kingsway buildings.

- 5.4 The proposed development would see significant investment in this Grade II listed building and the provision of a scholarly facsimile extension to the tower, designed with Seifert's original intentions in mind, to provide an additional storey of class B1 office accommodation and a setback rooftop office floor which also encases the existing unsightly rooftop plant.
- 5.5 A single set back storey extension to the Kingsway block is proposed and again, is highly contextual in design, with a mosaic façade as per Seifert's original décor found across the site. At the ground floor on Kingsway, it is proposed to remove the unsightly southern stair enclosure and re-enclose the stair with slimline glazing to celebrate its structural, modernist qualities and mosaic under tiling. The redundant petrol filling station will also be sensitively enclosed to provide a café or restaurant at ground floor within the tower.
- 5.6 The public realm will be activated with high quality landscaping to enhance the visitor and pedestrian experience and complement the flexible, active uses proposed at ground floor and basement levels. At this stage, the ground floor retail remains flexible within classes A1/A3, with the internal and external configuration indicative until tenants are confirmed.
- 5.7 Existing car parking at basement level along with two of the three access ramps are proposed to be removed to make way for cycle parking, end of journey facilities, plant storage, servicing and flexible business and events space. The removal of the ramps will also result in an increase of public realm across the site.
- 5.8 For full details of the development proposals, please refer to the Design and Access Statement and drawings prepared by Squire & Partners and submitted to support this planning and listed building consent application.

## Land Use Summary

5.9 The proposed land use (GIA sqm) at the site is as follows:

Land Use	Existing (sqm GIA)	Proposed (sqm GIA)	Net Change (sqm GIA)
Office (Class B1)	32,808	31,122	-1,686
Flexible Class A1/A3	0	1,234	+1,234
Flexible Class B1/B1 and events space (sui generis)	0	1,952	+1,952
UKPN	1,122	1,122	0
<b>TOTAL</b>	<b>33,930</b>	<b>35,430</b>	<b>+ 1,500</b>

5.10 The proposed land use (GEA sqm) is as follows:

Land Use	Existing (sqm GEA)	Proposed (sqm GEA)	Net Change (sqm GEA)
Office (Class B1)	33,805	32,244	-1,561
Flexible Class A1/A3	0	1,369	+1,369
Flexible Class B1/B1 and events space (sui generis)	0	2,443	+2,443
UKPN	1,158	1,158	0
<b>TOTAL</b>	<b>34,963</b>	<b>37,214</b>	<b>+2,251</b>

## 6 Consultation

- 6.1 The Localism Act 2011 emphasises the need for effective and meaningful pre-application consultation.
- 6.2 This is reiterated by the National Planning Policy Framework, February 2019, ('NPPF') which states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussions enable better coordination between public and private resources and improve outcomes for the community (paragraph 39).
- 6.3 Consultation is recognised as an essential tool for balancing the views and needs of different interest groups and securing mutually compatible solutions and as such has played an important role in the preparation of this planning application.
- 6.4 NPPF Paragraph 41 reiterates that the more issues that can be resolved at the pre-application stage, the greater the benefits.
- 6.5 The development proposals have been subject to consultation between the applicant, design team and the following stakeholders: -
- The London Borough of Camden planning, design and secure by design officers;
  - Historic England;
  - Local residents and businesses including the Peabody Estate and City Lit; and
  - Ward councillors and cabinet members.

### **Pre-Application Discussions**

- 6.6 Formal pre-application meetings in respect of these development proposals have been held with LBC planning, design and conservation officers on:

19<sup>th</sup> December – pre-app meeting with LBC planning and design officers



30<sup>th</sup> January – meeting with Historic England

13<sup>th</sup> February – meeting with LBC

1<sup>st</sup> March – meeting with secure by design officer for LBC

6<sup>th</sup> March – design workshop with LBC

5<sup>th</sup> April – follow-up design workshop with LBC

9<sup>th</sup> May – final pre-app meeting with LBC

- 6.7 Several iterations of the proposed design were subject to thorough review throughout the pre-application stage and the development proposals have evolved over the past 10 months to incorporate comments received in relation to design wherever possible.
- 6.8 Most notably, the height of the tower extension has been reduced through pre-application discussions with Historic England and LBC, and a more contextual design approach adopted.
- 6.9 Further detail on the design development and changes made as a result of pre-application discussions is included in Squire & Partner's Design and Access Statement.

### **Public Exhibition**

- 6.10 Two Public Exhibitions held on the 25<sup>th</sup> and 27<sup>th</sup> April were advertised by letter drop to surrounding businesses and residents. A total of 15 people attended the exhibitions across the two days including representatives from the neighbouring Peabody Estate and City Lit. Feedback on the proposals was very positive, with many supportive comments made.

### **Statement of Community Involvement**

- 6.11 An SCI has been prepared by London Communications Agency and summarises the pre-application consultation process undertaken and feedback received.

## **7 Planning Policy Context**

- 7.1 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:
- i. The London Plan. The London Plan presents the Mayor's spatial development strategy for London. This document has been consolidated with alterations since 2016. Hereinafter this will be referred to as the London Plan ("LP").
  - ii. The Camden Local Development Framework (LDF). The LDF is made up of Camden's Local Plan (2017) and various adopted Camden Supplementary Planning Guidance documents.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

### **National Planning Guidance**

#### **The National Planning Policy Framework (NPPF) February 2019**

- 7.3 The NPPF document sets out the Government's planning policies for England and how these are expected to be applied. It summarises in a single document all previous national planning policy advice. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.
- 7.4 The NPPF introduces the presumption in favour of sustainable development although it makes it clear that the Development Plan is still the starting point for decision making.
- 7.5 The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

- 7.6 One of the core planning principles of the NPPF is that planning should not simply be about scrutiny but instead be “a creative exercise in finding ways to enhance and improve the places in which people live their lives”.
- 7.7 The Ministerial Statement, ‘Planning for Growth’, emphasises the importance of securing economic growth and employment. The document states that when considering planning applications, Local Planning Authorities should support enterprise and facilitate housing, economic and other forms of sustainable development.
- 7.8 In terms of the historic environment, Paragraph 193 of the National Planning Policy Framework sets out that great weight should be given to the conservation of heritage assets. Paragraphs 194-195 set out the tests that need to be met where either ‘substantial harm’ or ‘less than substantial harm’ is caused to heritage assets.
- 7.9 Where any harm is caused the public benefits of the proposal should outweigh this harm.

### **Planning Practice Guidance, 2014**

- 7.10 The Planning Practice Guidance was produced and published by the Department of Communities and Local Government (DCLG) in March 2014. This resource makes Planning Practice Guidance available entirely online and allows users to link between the NPPF and relevant planning practice guidance, as well as other different categories of guidance.

### **Regional Planning Policy**

#### **The London Plan**

- 7.11 The London Plan (as amended, 2016) aims to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 years. The London Plan includes London-wide planning policy guidance and sets the relevant regional planning policy guidance for the London Borough of Camden and forms a component part of the statutory development plan.

- 7.12 The Mayor considers that the greatest challenge faced in London is to accommodate significant growth in ways that respect and improve London's diverse heritage while delivering the vision for an exemplary, sustainable world city.

### **The Draft New London Plan**

- 7.13 The draft New London Plan was published in December 2017. Consultation took place on the draft document up until 2 March 2018. The Mayor's Minor Suggested Changes to the London Plan were published on 13 August 2018. Adoption of the plan is targeted for late 2019 / early 2020. Once adopted, this will supersede the current London Plan.

### **London View Management Framework (LVMF, 2012)**

- 7.14 The Site is located within LVMF View 16A "The South Bank: outside Royal National Theatre". The LVMF sets out a list of strategic views that the Mayor will continue to review. The views are seen from places that are publicly accessible and well used. They include significant buildings or urban landscapes that help to define London at a strategic level. The LVMF acts as supplementary planning guidance for the management of the designated views.

### **Local Planning Policy: Camden Local Plan (2017)**

- 7.15 At the local level, Camden's Local Plan (2017) was adopted by 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.

### **Supplementary Planning Guidance**

- 7.16 Other relevant LBC Supplementary and Design Guidance of relevance to this application includes:
- Camden Planning Guidance— Design (March 2019);
  - Camden Planning Guidance (CPG2) – Housing (May 2006 updated March 2019);

- Camden Planning Guidance – Interim Housing (March 2019);
- Camden Planning Guidance 3 (CPG3) – Sustainability (July 2015, updated March 2018);
- Camden Planning Guidance – Energy efficiency and adaptation (March 2019);
- Camden Planning Guidance – Town centres and retail (March 2018);
- Camden Planning Guidance 6 (CPG6) – Amenity (September 2011, updated March 2018);
- Camden Planning Guidance– Air Quality (March 2019) (this replaces Chapter 2 of CPG6 ‘Amenity’);
- Camden Planning Guidance– Transport (March 2019);
- Camden Planning Guidance– Developer Contributions (March 2019); and
- Kingsway Conservation Area Statement (2001).

### **Site Specific Allocations**

- 7.17 Within the London Plan, the site is located in the Central Activities Zone (“CAZ”). The London Plan notes that the CAZ contains a unique cluster of vitally important activities including central government offices, headquarters and embassies, the largest concentration of London’s financial and globally-orientated business services sector and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media. The London Plan identifies that the Mayor and boroughs should inter alia recognise that the CAZ is the heart of London’s world city offer and promote and coordinate development so that together they provide a competitive, integrated and varied global business location.
- 7.18 The Site is located within designated View 16A “The South Bank: outside Royal National Theatre” of the LVMF (2012).
- 7.19 On the LDF ‘Policies Map Alterations’ the application site is located in the Central London Area. The site is also is designated as within the London Suburbs Archaeological Priority Area. 43-59 Kingsway is also located within the Kingsway Conservation Area.

## **Legislative Framework**

- 7.20 Given the site's listing and location within a conservation area, statute regarding the historic environment is relevant.
- 7.21 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that Local Planning Authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when considering applications.
- 7.22 Section 72 of the same Act sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

## **Principal Planning Matters**

- 7.23 The development proposals have been assessed against the following principal planning matters:
- i. Land Use;
  - ii. Design;
  - iii. Townscape and Heritage;
  - iv. Environment and Sustainability;
  - v. Amenity; and
  - vi. Transport and Servicing.

## 8 Land Use

- 8.1 This section assesses the proposals against relevant national, regional and local land use planning policies.

### **Principle of Development at the Site**

- 8.2 One of the aims set out in the NPPF (2019) is to ensure that developments optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks (paragraph 104). It is therefore important to ensure that a range of needs can be met through a new development.
- 8.3 The site is located within the London Plan defined Central Activities Zone (CAZ) and Camden's Central London Area.
- 8.4 The London Plan states that the Mayor is committed to protecting the unique character of the CAZ which covers London's geographic, economic and administrative core. The Mayor's strategic priorities for the CAZ are set out in Policy 2.10 of the London Plan and include:-
- Enhance and promote the unique international, national and London wide roles of the CAZ, supporting the distinct offer of the Zone;
  - In appropriate quarters, bring forward development capacity and supporting infrastructure and services without compromising residential neighbourhoods;
  - Sustain and enhance the distinctive environment and heritage of the CAZ;
  - In appropriate parts of the CAZ ensure that development of offices is not strategically constrained and that provision is made for a range of occupiers; and
  - Improve infrastructure for public transport, cycling and walking and optimise the development and regeneration benefits they can support.

### Assessment

- 8.5 It is therefore entirely appropriate for the site to be developed for a commercial mixed-use scheme in principle land use planning terms. The proposals have been developed to enhance this part of the CAZ by providing active frontages and regenerating what is currently a dilapidated and bleak commercial site in an important location between Covent Garden and Holborn. The proposals will result in improved permeability for pedestrians and provide a significant number of cycle parking spaces for commuters and visitors.

### **Office**

### Policy

- 8.6 The NPPF sets out the Government's commitment to securing economic growth and advises that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century.
- 8.7 The Ministerial Planning for Growth Statement, March 2011, notes the importance of securing economic growth and employment. The guidance considers that Local Planning Authorities should consider the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession and consider the range of likely economic, environmental and social benefits of proposals; including long term indirect benefits such as increased consumer choice, more viable communities and more robust local economies.
- 8.8 The London Plan notes that the CAZ contains a unique cluster of vitally important activities including central government offices, headquarters and embassies, the largest concentration of London's financial and globally-orientated business services sector and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media.
- 8.9 The supporting text of London Plan policy 4.2 acknowledges that in the CAZ, there remains a strong long-term office demand and a substantial development pipeline which is partly subject to the implementation of Crossrail (para 4.14). Environmental



improvements in these locations continue to be needed to enhance its attraction as a global business destination.

8.10 Policy E1 of the LBC's Local Plan explains that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses.

8.11 Local Plan Policy E2 encourages the provision of employment premises and sites in the borough and seeks to protect premises or sites that are suitable for continued business use. The policy states that the Council will consider higher intensity redevelopment of premises or sites that are suitable for continued business use provided that:

- c. the level of employment floorspace is increased or at least maintained;
- d. the redevelopment retains existing businesses on the site as far as possible, and in particular industry, light industry, and warehouse/logistic uses that support the functioning of the CAZ or the local economy;
- e. it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy and will be to a sustainable location;
- f. the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;
- g. the scheme would increase employment opportunities for local residents, including training and apprenticeships;
- h. the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and
- i. for larger employment sites, any redevelopment is part of a comprehensive scheme.

### Assessment

8.12 The existing building is currently in office use therefore the principle of office use at the site is established.

- 8.13 The proposals at the site involve the intensification of the existing employment use at the site in line with Local Plan Policy E1(i) through the refurbishment and extension of the existing buildings to provide a total of 33,074 sqm (GIA) office floorspace (including the flexible B1/B1 and events space at basement level), which is an uplift of 266 sqm GIA. Whilst this includes the flexible B1/B1 and events space at second basement level, the existing office floorspace in this location is ancillary only, comprising of parking, plant and storage space. In the proposal, this basement level becomes meaningful employment floorspace which would be used either for class B1 offices or a mix of class B1 offices and events space (sui generis).

#### Area schedule

Land Use	Existing (sqm GIA)	Proposed (sqm GIA)	Net Change (sqm GIA)
Office (Class B1)	32,808	31,122	-1,686
Flexible Class A1/A3	0	1,234	+1,234
Flexible Class B1/B1 and events space (sui generis)	0	1,952	+1,952
UKPN	1,122	1,122	0
<b>TOTAL</b>	<b>33,930</b>	<b>35,430</b>	<b>+ 1,500</b>

- 8.14 The site is located within the Central Activities Zone and is very highly accessible via public transport (PTAL rating 6b – the highest level). As such an increase in office floorspace in this location would again be supported in principle.
- 8.15 The proposed development would meet the tests of Local Plan Policy E2 in the following ways:
- c) the proposed development would increase the level of employment floorspace at the site by 266 sqm GIA;
  - d) whilst the CAA intend to move out of the site, the site will remain available for use by similar tenants i.e within class B1(a);

- f) the proposals have been designed to create an office building which will provide flexible internal floorspace. The open floor plate can then be subdivided as required by tenants;
- g) endeavours will be made to ensure apprentices are on site during the construction phase; and
- h) the scheme will provide a payment in lieu of housing at the site (see discussion within Mixed Use paragraphs of this statement.) The sum will be agreed with LBC and is included in the proposed Heads of Terms.

### Conclusion

- 8.16 The proposals will intensify and significantly enhance the quality of the commercial floorspace at the site and would result in a flexible floorspace arrangement that could be occupied by either a single tenant or a range of tenants, thereby increasing the types of companies that could operate at the site and the variety of the job provision in the area. The proposals will therefore significantly contribute towards meeting the targets set out in the London Plan and to the character and function of the CAZ.
- 8.17 The proposals will facilitate modern occupier demands and are in accordance with the aspirations of the London Plan which seeks renovation/renewal of office stock to increase and enhance the quality and flexibility of London's office market.
- 8.18 The proposals are in line with NPPF economic growth objectives and therefore accord with Policy 4.2 of the London Plan and Camden Local Plan Policies E1 and E2.

### **Flexible Retail**

#### Policy

- 8.19 At a national planning policy level, paragraph 85 of the NPPF states that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the Plan period.
- 8.20 The guidance makes clear that local planning authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres.

- 8.21 At a regional level, the London Plan sets out a number of policies relating to town centres and retail development.
- 8.22 Within the CAZ, the London Plan seeks to support and improve the retail offer for resident, workers and visitors (Policy 2.10). In addition, the London Plan acknowledges one of the CAZ's strategic functions is to ensure that development provides for a mix of uses (Policy 2.11).
- 8.23 London Plan Policy 4.7 relates to retail and town centre development in relation to the London Plan strategic direction and planning decisions. The policy supports a strong approach to assessing need and bringing forward capacity for retail development in town centres. The scale of retail should be related to the size, role and function of a town centre and its catchment.
- 8.24 In addition, London Plan Policy 4.8 seeks to support a successful and diverse retail sector.
- 8.25 At a local level, Local Plan Policy E1 part (i) recognises the importance of other employment generating uses, including retail within office developments in Central London. Policy TC1 states that the delivery of retail growth and related uses can be provided in designated growth areas and existing centres.
- 8.26 According to Local Plan Policy TC2, LBC will promote successful centres for residents, visitors and workers by:
- i. Seeking to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre;
  - ii. Providing for and maintaining a range of shops, services, food, drink and other suitable uses to provide variety, vibrancy and choice;
  - iii. Protecting and promoting small and independent shops, and resisting the loss of shops where it would cause harm to the character and function of a centre;
  - iv. Making sure that food, drink, and entertainment uses do not have a harmful impact on residents and the local area, and focusing such uses in Camden's Central London Frontages, Town Centres;

- v. Supporting and protecting Camden's local shops, markets and areas of specialist shopping;
- vi. Pursuing the individual planning objectives for each centre.

### Assessment

- 8.27 It is proposed to introduce flexible class A1/class A3 retail uses at ground floor and basement level at the site, with a total retail floorspace and uplift of 1,234sqm GIA across the site.
- 8.28 The development site lies just south of the designated Holborn Central London Frontage, which continues down Kingsway to the edge of the site, encompassing City Lit. Given the site's proximity to this frontage it is considered appropriate to include flexible retail uses at ground floor level.
- 8.29 At this stage, the flexible A1/A3 ground floor layout is submitted as indicative only, as the actual split of units and their resultant entrances and shopfronts will be confirmed at a later stage and by planning conditions. This approach was agreed during pre-application discussions with LBC. Shopfronts will be designed to be contextual and therefore sensitive to the listed building, with advertisements to be controlled via separate advertisement consent applications at the appropriate time.
- 8.30 Retail servicing would take place on site to the north east of the tower in a designated off-street bay, which is the furthest point away from the residential use within the Peabody Estate. The proposed retail elements would bring the ground floor of the building to life, enhance the vitality of the area and be in keeping with the existing uses within the area, without harming the amenity of local residents in accordance with the objectives of Camden Local Plan Policy TC3 and E1.
- 8.31 Not only will the active uses be available to users of the commercial floorspace at the site, the will offer convenience to local users, visitors, tourists and students of City Lit, and offer a reflection of the site's very central location. The proposed retail floorspace is considered appropriate for the site and its surrounding area.

## **Flexible Class B1/B1 Events Space**

### Policy

- 8.32 Camden Local Plan Policy E1(a/b) supports businesses of all sizes in particular start-ups, small and medium sized enterprises and seeks to maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes and available on a range of terms and conditions.

### Assessment

- 8.33 It is proposed that basement level 2 and part of basement level 1 will be used for either ancillary Class B1 office floorspace associated with the tenants of the building, or for a mix of other class B1 business use and events, such as external business meetings, exhibitions, day and evening events and displays under the operation of a specialist events management company.
- 8.34 The principal function of the proposed space will therefore be a 'blank canvas' space which either internal or external brands including start-ups and SMEs can use and flexibly curate into a working exhibition, event and/or interactive display space, or for events ancillary to B1 office use.
- 8.35 A framework Operational Management Plan, prepared by Seaforth Land, sets out the vision and the management principles of the space, to be further refined as and when an events operator is onboarded. The proposed events space is at basement levels with its entrance off Kingsway at the north of the site, therefore at some distance from any residential use.
- 8.36 The events space would have flexible opening times between 07:00am through to 01:00am the following day, Monday to Saturday. Sunday events would start at 08:00am and cease at 10.30pm. Visitors to the space would be strictly managed to avoid any queues along Kingsway, and the maximum capacity of the space would be limited to 500.
- 8.37 The proposed flexible B1/B1 and events space (sui generis) is therefore considered to accord with Policy E1.

## **Mixed Use**

### Policy

- 8.38 London Plan Policies 2.11 and 4.3 states that the Mayor and Boroughs should ensure that development proposals to increase office floorspace within the CAZ include a mix of uses including housing. This has, however, been supplemented by the recently adopted CAZ SPD. The emphasis of this SPD is to encourage the provision of office and business floorspace within the CAZ and the document sees a shift towards greater weight being placed on the provision of offices and other CAZ strategic functions relative to new residential. In this particular location it states that offices and other CAZ strategic functions should be given greater weight relative to new residential.
- 8.39 At a local level, policy H2 contained within the Camden Local Plan states that, where non-residential development is proposed, the Council will promote the inclusion of self-contained homes as part of a mix of uses. In the Central London Area (where the site is located) where development involves additional floorspace of more than 200sqm (GIA), Camden will require 50% of all additional floorspace to be self-contained housing, subject to a set of criteria.

### Assessment

- 8.40 The proposed development results in an uplift in commercial floorspace on site of 1,500sqm GIA. The on-site housing requirement is therefore 750sqm GIA. The following assessment sets out responses to each of the tests of Camden Local Plan Policy H2.

### **Policy H2**

- 8.41 The Policy states that within the specified areas, in which the site is located, the Council will consider whether self-contained housing is required as part of a mix of uses taking into account:
- a) the character of the development, the site and the area;
  - b) site size, and any constraints on developing the site for a mix of uses;

- c) the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
- d) whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
- e) whether the development is publicly funded or serves a public purpose.

**a. the character of the development, the site and the area;**

- 8.42 **Response:** Historic England's 'reasons for designation' describes one of the main reasons for the site's listing as follows: "**architectural interest: as one of London's best speculative office buildings**". Therefore, to introduce residential use at the site would harm the special character of the listed building as derived from its use, one of its most important historical assets. Further **historic interest** is also attributed to the building as an 'icon of the 1960s commercial property boom by the most successful developer-architect partnership of the day...'. Harry Hyams and Richard Seifert were indeed noted for the unabashedly commercial design and style of their collaborations, which focused upon maximising lettable space. This remains evident in the design of Space House, and its maintenance as a commercial building upholds and secures its optimum viable use, as outlined by Paragraph 15 of the National Planning Practice Guidance and as supported by the National Planning Policy Framework.
- 8.43 The most appropriate use of the site is for commercial and not residential. The special character of the site would be compromised by the introduction of residential use as the original design intent of the listed building was for speculative office use. Residential use would have a distinctly different external manifestation in the appearance of the building than office use, especially at night-time, when lights would be on sporadically throughout the residential units. The residential units would also require some form of blinds or curtains which would further erode the brutalist and uniform appearance of the building.
- 8.44 **Tower:** The special interest of the site would be harmed due to the MEP penetrations required throughout the tower to support residential use. This would result in a large quantum of plant space at roof level where the office plant is proposed to be located. In addition, area at ground and first floors would need to be converted into a residential



core, which would have implications for the layout of the office foyer at ground and the remaining office floorspace at first floor level.

- 8.45 The office floorplates in the tower would be severely compromised by such physical interventions to the extent that they would become unviable and thus render the proposed scheme unviable, as the office floorplates would not meet market demand and would be unlettable. There would also be an increase in the rooftop plant, lifts and cores required which could compromise the roof form of the proposed extension and thus the character and appearance of the site, the longer views and the wider area.
- 8.46 In terms of the quality of the residential units in the tower, these would all be single aspect given the spherical shape of the building and would not benefit from external amenity space.
- 8.47 **Kingsway block:** As part of the same listed building, the comments above also apply to the Kingsway block, which is also a speculative and purpose-built commercial listed building. It is considered that the character of the building would be eroded by the introduction of residential floorspace.
- 8.48 As with the tower, the Kingsway building would be severely compromised by the physical interventions required to deliver residential use within the building. The legibility of the building would become compromised by residential lighting and blinds which would break the otherwise neat grid of the façade from which historic and architectural interest is derived.
- 8.49 Furthermore, residential use fronting Kingsway is not considered an appropriate location. The ability to provide external amenity space is limited and both noise and air quality on Kingsway would need to be reviewed. Overall, it is considered that an appropriate standard of residential amenity in this location would be very difficult to achieve.
- 8.50 In addition, incorporating residential use would require the removal of the proposed active frontages from the scheme which have been designed to enliven this part of Kingsway.
- 8.51 In terms of land use generally, employment floorspace in this CAZ location is protected and promoted, with office use afforded greater weight than residential use

according to the adopted CAZ SPG. Para 4.2.2 of the SPG states that “**the requirement to accommodate residential development within the CAZ should be managed sensitively to ensure new development does not strategically constrain the overall provision of office floorspace**”. It is considered that the provision of residential use in this location would constrain the overall provision of office floorspace. Introducing residential would compromise the quality of the commercial floorspace delivered as part of the proposed scheme and would therefore not comply with this SPG objective.

**b. site size, and any constraints on developing the site for a mix of uses;**

- 8.52 **Response:** The existing floorplates are designed for commercial use and are not readily adaptable for residential use having regard to London Housing SPG standards as well as their Grade II listing. This includes the ability to meet Camden’s Housing Standards SPG due to and lack of private amenity space. The plant area and drainage systems would also become inefficient due to the increased number of cores and a significant increase in interventions to the listed fabric of the building would be required.
- 8.53 Furthermore, given the circular shape of the tower, the refurbished office floorspace delivered on the floors below would be significantly compromised due the introduction of a residential core.
- 8.54 **Affordable housing:** There would not be an opportunity to provide a mix of tenures in either the tower or the Kingsway block given the space required for separate residential cores, for what would be the equivalent of one affordable residential unit.
- 8.55 **New residential building:** There is no potential for a new residential building on the site. There is only one location available on the western portion of the site which would be landscaped public realm around one retained ramp in the proposed development. In this location, the existing vertical elements which support the ramps on site and the current raft foundation below would not be suitable to support a new building.
- 8.56 An additional building in this location would block the entrance in views and prohibit the proposals for the ‘filling station’. It would also significantly reduce the amount of public realm available and impede on the site’s ability to deliver the highest quality

public realm. A new building in this location would also need to be tested in daylight and sunlight and rights of light terms on the surrounding properties.

**c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;**

8.57 **Response:** this is not relevant as the site sits outside the Hatton Garden area.

**d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and**

8.58 **Response:** this is not relevant as the site sits outside the Hatton Garden area.

**e. whether the development is publicly funded or serves a public purpose.**

8.59 **Response:** (i) the development would open this Grade II listed site up to the public at ground and basement levels and would deliver a vastly improved public realm. The delivery of this significant public benefit is contingent upon the provision of flexible retail uses at ground floor.

8.60 Policy H2 goes on to state that where housing is required as part of a mix of uses, Camden will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

8.61 In considering whether housing should be provided on site and the most appropriate mix of housing and other uses, the Council will take into account criteria (a) to (e) and the following additional criteria:

**f. the need to add to community safety by providing an active street frontage and natural surveillance;**

8.62 **Response:** The proposed development will provide active street frontages and increase the level of natural surveillance at the site through the introduction of flexible Class A1/A3/B1 uses at basement and ground floor level. If residential accommodation were provided, an additional core would be required which would

inevitably reduce the level of active street frontage around the perimeter of the building. A meeting has been held with Camden's Secured by Design officer (1 March 2019) who confirmed that there is an existing issue at the site of criminal behaviour and that the introduction of active frontages, as proposed within this application, would contribute to deterring this behaviour at the site.

**g. the extent of any additional floorspace needed for an existing user;**

8.63 **Response:** this policy test is not relevant as the existing user will not be retained.

**h. the impact of a mix of uses on the efficiency and overall quantum of development;**

8.64 **Response:** the introduction of residential use within the proposed development would adversely impact on the proposed mix of uses, thereby prejudicing the delivery of increased, flexible office floorplates for the Borough.

8.65 Furthermore, the quantum of development at the site has been restricted and led by heritage and townscape.

8.66 Local Plan Policy E1 sets out the need to protect and enhance existing employment sites. Policy G1 seeks to focus Camden's growth in the most suitable locations and manage it to make sure that Camden delivers its opportunities and benefits and achieves sustainable development, while continuing to preserve and enhance the features that make Camden an attractive place to live, work and visit. By maximising commercial floorspace on site we are able to meet the above policy priorities of the Local Plan.

**i. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and**

8.67 **Response:** this is not relevant as an FVA has not been prepared for the application.

**j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.**

8.68 **Response:** the required provision of residential on site amounts to 750sqm GIA. Given the layout of the building and the significant amount of floorspace that would

be required to provide the necessary residential core, circulation space and plant space, the remaining floorspace would deliver only a small number of private residential units at the site with no affordable housing. This does not meet the objectives of the Local Plan as set out in Policies E1 and E2 and Policy H2.

#### Off site provision of residential floorspace

8.69 The Applicant does not own any alternative sites within the Borough which could be used to accommodate the residential requirement.

8.70 Gerald Eve has conducted a search of properties on the market on either a freehold or long leasehold basis in the vicinity of the site that could accommodate the required residential floorspace. Over 30 properties were shortlisted but had to be discounted for one or more the following reasons –

- The property had undergone a recent refurbishment to provide Cat A offices and therefore it would not be appropriate or viable to undertake a conversion to residential use;
- The floorspace was part of a new, purpose-built commercial development;
- The property did not benefit from any amenity space;
- There was no ability to provide a separate entrance and core to the residential use;
- The property was listed and inappropriate for residential use.

8.71 In this case, the optimum way to meet the Local Plan objectives and that of Policy H2 would be to make a payment in lieu contribution to the borough which could then be used to deliver affordable housing. Excluding residential use from the proposals ensures that the development opportunity for commercial floorspace at the site is maximised in line with the wider objectives of Camden's Local Plan.

#### Conclusion

8.72 This assessment has clearly demonstrated that the site and the proposed development are not capable of providing any residential floorspace and indeed it would be inappropriate and detrimental to the development and the listed building to require the delivery of residential floorspace on site. Pre-application feedback from Camden confirmed that the justification for not providing on-site residential floorspace

is reasonable and accepted. The assessment shows that in order to meet the Local Plan objectives of maximising housing delivery, a payment in lieu should be allowed to contribute towards the delivery of affordable housing within Camden.

## 9 Design

- 9.1 This section reviews the proposals against relevant national, regional and local planning policy in term of design.

### Policy

- 9.2 The NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (Chapter 12).
- 9.3 It identifies that securing high quality and inclusive design goes beyond aesthetic considerations. Therefore planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment (Paragraph 185).
- 9.4 Policies 5.3 and 7.2 of the London Plan seek development to meet the highest standards of sustainable and accessible design and construction, to improve the environmental performance of new development and to adapt to the effects of climate change over their lifetime.
- 9.5 London Plan Policy 7.3 advises that design should encourage a level of human activity that is appropriate to the location, to maximise activity throughout the day and night, creating a reduced risk of crime and sense of safety at all time.
- 9.6 London Plan Policies 7.4, 7.5 and 7.6 seek to ensure that development respects the local character of the area; promotes high quality public realm; and ensures that the architecture makes a positive contribution to a coherent public realm, streetscape and wider cityscape.
- 9.7 London Plan Policy 7.6 sets out a series of overarching design principles for development in London and advises that large scale buildings should be of the highest quality design, including inter alia:
- i. Optimise the potential of sites;
  - ii. Promote high quality inclusive design;

- iii. Incorporate the best practice in resource management and climate change mitigation;
  - iv. Comprise materials and details which complement local architectural character; and
  - v. Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm.
- 9.8 At a local level, Camden Local Plan Policy D1 seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use.
- 9.9 This policy reflects the London Plan design and principles and goes on to state that the Council will require all developments to be of the highest standard of design and will expect developments to consider:
- i. The character, setting, context and form and scale of neighbouring buildings;
  - ii. The character and proportion of the existing building;
  - iii. The quality of materials to be used;
  - iv. The provision of visually interesting frontages at street level;
  - v. The appropriate location for building services equipment;
  - vi. The provision of appropriate hard and soft landscaping; and
  - vii. The provision of appropriate amenity space.
- 9.10 Camden has also published a Planning Guidance SPD (March 2019) which establishes design principles to be used in the assessment of development proposals. The document reinforces or where necessary amplifies existing guidance and defines the Council's expectations for new buildings, as positive and enduring additions to this unique urban landscape. The key messages are to consider:
- i. The context of a development and its surrounding area;
  - ii. The design of the building itself;
  - iii. The use and function of the building;
  - iv. Using good quality sustainable materials;
  - v. Creating well connected public spaces and good quality public realm;
  - vi. Opportunities for promoting health and wellbeing;



vii. Opportunities for improving the character and quality of an area.

### Assessment

- 9.11 The project architects, Squire & Partners, have designed a coherent and legible scheme of refurbishment and extensions which respects the character and appearance of the listed buildings and provides enhanced frontages to both the Kingsway building and the tower.
- 9.12 As well as cleaning the facades and replacing the windows, the refurbishment programme would see the revitalisation of the office floors to create state of the art open plan office space that celebrates brutalist construction.
- 9.13 In accordance with Policy D1, by stripping out all the false ceilings and dry lining partitions, the existing structural coffered slab and ribbed soffits would be revealed and users of the space would experience the raw structure of Space House. Services would be upgraded throughout the buildings to provide energy efficiency. Frontages would be activated with high quality glazing and flexible retail uses, and the public realm across the site would be enhanced with new hard and soft landscaping.
- 9.14 A detailed Design and Access Statement (DAS), prepared by Squire & Partners, has been submitted to accompany this planning application. The DAS sets out in detail the key design matters which have been considered as part of the proposals.

### **Extensions**

- 9.15 The proposed extensions have been carefully designed following detailed pre-application discussions with Camden Council officers. In order to ensure that the extensions are appropriate in terms of scale and materiality for their host structures, several models were reviewed during the design development to test the built form and facade at various scales.
- 9.16 As a result of the collaborate pre-application discussions, the tower extension was reduced in height and it was agreed to progress a scholarly replica of the typical tower floor, extruding the form up by one additional storey, with a set back office floor on top serving as a penthouse office floor but also a plant screen. This ensures that the vertical rhythm of the tower is maintained, with Seifert's original design intent for the roof 'cap' forming the basis of SQUIRE & PARTNERS's design for the plant-level

penthouse storey. New plant will then be sunk into this envelope, consolidating the roofline in local and longer views. Overall, the proposed tower extension, which strongly takes its cues from the original building and the original architect's design intent, is considered to preserve the context and character of the site and enhance the building, creating a clean and high-quality roof form.

- 9.17 In a similarly contextual manner, the single storey extension to the Kingsway block pays homage to the existing mosaic clad lift overrun on the existing Kingsway roof. The massing and form of the extension is of a lozenge shape, again in keeping with the subtle curved form of the lift overrun. Windows are then punched into the mosaic envelope to provide views across to Lincolns Inn Fields and towards the tower.
- 9.18 Simple, glazed edge protection would be provided to the roof terraces to afford tenants of the buildings amenity space.

### **Kingsway Southern Stair and Petrol Filling Station**

- 9.19 The south stair of the Kingsway block is currently enclosed with a crude, thick aluminium-framed glass screen which completely obscures this original, structural stair and disrupts Seifert's intentions for the building. The stair was intended to be open, which, in conjunction with the external concrete columns would add to the effect of the building appearing to 'float'. Due to security and fire regulations this is no longer possible, however SQUIRE & PARTNERS have designed a slim-line glazed enclosure to be set around the perimeter edge of the block, rather than crashing into the columns, to reveal and celebrate this highly designed corner of the site.
- 9.20 The proposed enclosure seeks to reintroduce Seifert's original composition by enclosing the stair and pilotis with floor to soffit high glazing. This move then allows for the composition to be enjoyed as it once was intended whilst also exposing the pilotis and allowing the building to appear as if it is floating once more.
- 9.21 This part of the Kingsway block would be flexible class A1/A3, meaning members of the public would be able to enter and view the mosaic stair and pilotis up close. Externally, in accordance with London Plan Policy 7.3, the enclosure would remove the nooks and crannies created by the existing, awkwardly configured enclosure which are considered by Camden's Secure by Design Officer to create a crime hotspot.

- 9.22 A similar approach has been taken with the now redundant petrol filling station, where slimline faceted glazing is proposed to be fixed to the underside of the concertina concrete canopy, set back from the edge, to create an enclosure for flexible class A1/A3 in this prominent and sunny part of the site, oriented towards Covent Garden. The faceted glass will mimic the profile of the canopy edge and return back towards the tower just clear of the sculptural Y columns.

### **Public Realm Landscaping**

- 9.23 The existing ground floor elevation lacks any form of design and appears lacklustre and private and it is widely acknowledged that little thought was ever given to the external space around the buildings. The proposals will introduce activity and vitality to the streetscene which will support the character and function of the area through the following proposed design interventions:

- Two of the three car parking ramps will be removed and this area given back to public realm;
- The existing swathe of blue railings will be removed;
- The mosaic clad vent and geometric concrete bench will be retained and cleaned;
- A geometric paving pattern, which takes its cues from the geometry of the buildings, will be installed to enhance visual amenity and guide users of the public realm;
- New planters will be provided with soft landscaping to provide urban greening to the site;
- Tables and chairs will be placed outside the flexible retail units to ensure active use of the space;
- Soft lighting will enhance the buildings and the landscaping in the public realm adding visual interest and improving security.

### Conclusion

- 9.24 As a result of the collaborative and thorough pre-application discussions, the proposals have been refined to represent appropriately scaled, high-quality extensions and a contextual and sympathetic refurbishment of this grade II listed brutalist building. Users of the building and the public realm will be able to appreciate the intricate and structural details of the building which will be celebrated in the proposals.
- 9.25 The design of the proposed development therefore accords with National and Regional Guidance, Camden Local Plan Design Policy D1 (i-vii) tests and is in line with Camden's Design SPD key messages for delivering excellent design.

## 10 Townscape and Heritage

### Policy

- 10.1 Under paragraph 189 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting.
- 10.2 Paragraph 192 states that in determining planning applications, local planning authorities should take account of:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
  - The desirability of new development making a positive contribution to local character and distinctiveness.
- 10.3 When considering the proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.
- 10.4 Where a development proposal will lead to a 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 securing its optimum viable use (paragraph 195).
- 10.5 Camden Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. In order to maintain the character of Camden's conservation areas the council will require that development within conservation areas preserves or, where possible, enhances the character or

appearance of the area. The Council will also resist development that would cause harm to significance of a listed building through an effect on its setting.

### Assessment

- 10.6 The Kingsway Conservation Area Statement (2001) confirms that the conservation area was created at the turn of the twentieth century. The majority of buildings in Kingsway were constructed in a relatively short period between 1900 and 1922. Throughout the conservation area, generally the buildings have shops at ground floor level and offices above. The Site is described as **“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”** (page 11).
- 10.7 The site is statutorily listed (Grade II) and is partially located within Camden’s Kingsway Conservation Area (the Kingsway block only). The Strand Conservation Area and the Covent Garden Conservation Area lie adjacent to the site (in WCC) and the Seven Dials Estate Conservation Area lies to the west (in WCC). The Site is also located near several listed buildings including:
- i. 122 Drury Lane (Grade II);
  - ii. 44-46 Kingsway (Grade II);
  - iii. 40-42 Kingsway (Grade II);
  - iv. 64-78 Kingsway (Grade II);
  - v. 27, 28, 30, 31, 34, 35 and 38 Great Queen Street (Grade II);
  - vi. Bruce House (Grade II);
  - vii. Kodak House (Grade II);
  - viii. Lincoln’s Inn Fields (Grade II Park and Garden);
  - ix. 61-63 Great Queen Street (Grand Connaught Rooms) (Grade II\*); and
  - x. Freemasons Hall, Great Queen Street (Grade II\*).

- 10.8 As a result, the character, appearance and setting of the listed building on the site, the surrounding listed buildings and conservation areas have been considered within the development proposals.
- 10.9 With regards to townscape, the site is located within the LVMF view 16A. This view relates principally to the Grade I listed Somerset House and its immediate setting of Brettenham House, Waterloo Bridge and Kings College.
- 10.10 The Kingsway Conservation Area Statement (2001) identifies several key local views along Kingsway, within which the Site sits:
- i. Kingsway;
  - ii. Kingsway/Kemble Street; and
  - iii. Kingsway/Wild Court.
- 10.11 The refurbishment and extension of the building has been carefully designed to both respect and reflect the heritage of the site and the surrounding area as well as local townscape. This is clear in the Design and Access Statement, prepared by Squire & Partners as the scale and grain of the existing buildings on the site and the surrounding area and the setting of important neighbouring buildings has been thoroughly reviewed.
- 10.12 In accordance with NPPF paragraph 189, the Historic Building Report prepared by Donald Insall Associates, identifies the elements of the site that are of highest significance through to those that detract from the listed building's significance. Elements that are of the **highest significance** and therefore sensitive to change include:
- i. The external elevations of the tower, link-bridge and Kingsway block; and
  - ii. Original structural forms and elements of the building, including pre-cast concrete frames in their slab and cylindrical forms, concrete pilotis and their spatial relationship to each.
- 10.13 Elements which have been identified as **detracting** from the building's significance and therefore present opportunities for the proposed development to improve the site include:

- i. The modern additions to the ground floor of the tower, including the glazed entrance lobby, entrance sign, canopy and low-level plant;
- ii. Conspicuous plant and communications services on the roof of the tower, which also cover the original mixed mode ventilation ducts;
- iii. The ground floor enclosure around the former external stair and concrete pilotis on the south side of the Kingsway block;
- iv. 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;
- v. 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;
- vi. The numerous suspended ceilings in the interiors of both buildings; and
- vii. The clutter of modern services, access stairs and platforms installed within the two internal mixed-mode ventilation ducts within the tower.

10.14 The Historic Building Report considers the Kingsway block adds a “**strikingly modern contrast**” to the Edwardian character of the Kingsway Conservation area. The tower, although not within a conservation area, makes a positive contribution to the setting of the conservation area, though roof level plant visible from Kingsway detracts. The cluttered rooftop plant and services are also visible in views from the adjacent conservation areas and this unfortunately detracts from the interest and contrast that the Modernist commercial building otherwise contributes to those streetscapes.

10.15 The proposed development seeks to re-invigorate the Grade II listed building which has been under-utilised as a London Modernist landmark for decades. The scheme would improve the sustainability of the building and maximise the use of the accommodation on the site. In terms of Paragraph 192, the proposed public realm interventions would also significantly improve the setting of the listed building – an aspect that was largely overlooked in the original scheme.

10.16 The design of the tower extension is that of a scholarly replica storey and rooftop cap as per Seifert’s original design. In this way, the roof will benefit from the de-cluttering of plant and the provision of a coherent roof form. The same applies to the Kingsway building.



- 10.17 The tower, which is considered somewhat truncated, is extruded upwards in a proportionate composition. With regards to Paragraph 195 of the NPPF, DIA considers that the proposed extension to the tower would enhance the character and appearance of the overall composition of the building. Any perceived harm that there might be in this respect would be less than substantial and outweighed by the benefits of the wider scheme generally, including the cleaning of the facades and the significant public realm improvements.
- 10.18 Whilst the removal of two of the three original ramps would technically cause harm to the original fabric, they are considered utilitarian and largely redundant given the policy requirement to remove car parking. This harm is considered less than substantial, again, outweighed by the benefits of the wider scheme.
- 10.19 Similarly, the infilling of the mixed mode ventilation ducts and expansion of lift cores would cause some harm, however this is to fabric of low significance and enables the long-term, sustainable use of the building.
- 10.20 At ground floor level, 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 more modern 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.
- 10.21 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 flexible retail units. These alterations would have no impact upon the significance of the listed building and would offer significant benefits in breathing life into what is currently a cold and inanimate service yard. The proposed flexible retail units are considered to improve both the relationship between the building and the conservation area, the relationship between the building and the

public realm, the overall appearance of the building and footfall to areas behind the Kingsway block, which are presently neglected.

- 10.22 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.
- 10.23 The general improvement works to the ground floor level would offer elegant, streamlined street frontages that enhance the tower and Kingsway block and are truly activated but also flexible, ensuring the long-term use of the listed building. 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.
- 10.24 Overall, the proposals are considered to offer substantial public benefits which would outweigh any perceived ‘less than substantial harm’ to the heritage assets.
- 10.25 With regards to townscape, LVMF View 16A, which is dominated by Somerset House and the Thames riverfront, captures just the very top of the tower from the South Bank and therefore the unsightly array of bulky plant on the roof. The LVMF encourages developments in the background of View 16A which improve the setting of Somerset House through appropriate, high-quality design whilst respecting Somerset House as the principal building in the view. The LVMF goes on to state that **“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”** (page 144).

- 10.26 In the eastern and westernmost perspectives from the vantage point of this transient view, 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. However, it is considered that the quality of the proposed extension would allow the distinctive geometric exterior concrete pattern of the listed building to be appreciated and offer a pleasing contrast to the classical exterior of Somerset House.
- 10.27 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.
- 10.28 In total, 8 local viewpoints were selected in conjunction with officers at LBC to be analysed to determine the impact of the proposals on the local townscape. The roof extensions are considered to be the principal elements of the proposals which would bear an effect on local views. As with View 16A, the existing unsightly jumble of plant on top of the tower detracts from local views too, and it is considered that the proposed two storey facsimile extension plus roof cap would substantially improve the current views of the roofline through a streamlined, high quality and contextual design approach. The Kingsway extension would also offer a cleaner rooftop extension, drawing cues from the mosaic materiality of the extant enclosure in a set back new storey.
- 10.29 Ultimately, the extensions have been designed to be subservient to their host buildings, allowing the original and celebrated forms of their exteriors to be celebrated.
- 10.30 Following a pre-application meeting with Historic England in January 2019, they advised that the reduced scale of the roof extension to the tower was welcomed. They consider that the circular tower, with its expressive exterior, is the most significant element of the building but that the proposed new roof extension is, in their view, suitably deferential to the historic building below, and would not have a serious impact on the important view towards Somerset House from the South Bank of the Thames. In that regard, Historic England were content with the proposals in principle.

### Conclusion

- 10.31 The surrounding environment has been carefully considered in the development of the proposals having regard to the relevant legislative framework.
- 10.32 The proposals offer substantial public benefits which would outweigh any perceived 'less than substantial harm' to the heritage assets, therefore meeting the tests of the NPPF relevant to the historic environment.
- 10.33 The proposals are considered to accord with the Mayor's LVMF guidance which remarks that development in the background of Somerset House must not dominate the landmark.
- 10.34 In terms of the proposed development's impact on local townscape, DIA considers that the roof extensions have the potential to positively contribute to the rooflines visible from the Kingsway Conservation Area and indeed wider views.
- 10.35 The design of the proposal is consistent with the relevant national tests and regional and local policy requirements. The design meets the statutory tests of Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as it will preserve and enhance the character and appearance of listed building and the Kingsway and surrounding conservation areas. The full heritage and townscape assessments are provided in DIA's Historic Building Report and Heritage Views Impact Assessment, submitted in support of this application.

## 11 Environment and Sustainability (inc. SUDs)

- 11.1 The NPPF sets out the Government's overarching planning policies regarding the delivery of sustainable development through the planning system. Chapter 14 of the document identifies the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 11.2 In accordance with national level objectives, the London Plan sets out the Mayor's vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 11.3 In accordance with National level objectives, the London Plan sets out the Mayor's vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 11.4 Policy 5.2 requires new development to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
  - a. Be lean – use less energy;
  - b. Be clean - supply energy efficiently;
  - c. Be green – use renewable energy.
- 11.5 At a local level, through Local Plan Policy CC1 Camden requires all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 11.6 Local Plan Policy CC2 requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures.

- 11.7 Local Plan Policy CC2 also promotes the incorporation of sustainable design and construction measures within developments.
- 11.8 In March 2019 LBC updated the Camden Planning Guidance 'Energy Efficiency and Adaptation' to ensure that the Council's commitment to reducing carbon emissions is achieved.

#### Assessment

- 11.9 The proposals have been assessed against LP Policy 5.2 which requires new development to make the fullest contribution to minimising carbon dioxide emissions in accordance the energy hierarchy.
- 11.10 The Energy Statement, prepared by RES, in support of this application outlines how the proposed development will achieve a 58.32% overall regulated CO2 reduction against 2013 Part L2B compliant baseline.

#### **Be lean – Use Less Energy**

- 11.11 Section 7 of the submitted Energy Statement demonstrates that the goals of 'be lean' will be met within the new development through the incorporation of the following:
- a. a community heating system supplying the office heating;
  - b. high efficiency heating and cooling plant;
  - c. heat recovery systems;
  - d. high efficiency fans and pumps;
  - e. highly efficient LED lighting with presence detection and daylight management; and
  - f. power factor correction.
- 11.12 It is also proposed that that glazing is upgraded, external walls are insulated and that the roof is stripped and re-insulated and waterproofed.
- 11.13 In terms of 'Be Lean', the Energy Statement demonstrates that the proposed development betters the Base Case with an overall reduction of 58.27% against the Base Case for the development.

**Be clean – supply energy efficiently**

- 11.14 A connection to any heating infrastructure is not possible as part of the development proposals as there are no existing or proposed District Heating networks within connectable range of the scheme.
- 11.15 Whilst there are no current local networks the development will make provision for future connection to a district heat network via the provision consists of a soft punch point in the structure to allow easy connection in the future.
- 11.16 In terms of providing a Combined Heating and Power (CHP) and/or Combined Cooling, Heat and Power (CCHP) solution at the Site, the development is too small for the efficient operation of CHP and/or CCHP and as such CHP and CCHP have not been incorporated into the proposals.

**Be green – use renewable energy**

- 11.17 The Energy Statement assesses the appropriateness of several renewable energy sources for inclusion within the proposed development.
- 11.18 Wind turbines are not considered applicable at the site as the site's urban environment produces lower and turbulent wind speeds which will diminish the electricity production and increase the payback period. Furthermore the installation of wind turbines on the roof would have a significant visual impact on the listed building and would not serve to preserve or enhance its character and appearance in line with NPPF requirements. Finally, turbines would generate noise and potential vibrations which would detrimentally affect the existing amenity of the surrounding area.
- 11.19 Solar Water Heating and Photovoltaics have been assessed and found not to be applicable because it would alter the silhouette and height of the proposed extensions at the site. The extensions have been subject to thorough pre-application discussions with the Council and as such the appearance and height cannot be amended. It is also not proposed to site PV on the roof of the Kingsway Building due to the shading from the Tower Building.

- 11.20 Ground Source Heat Pumps are not considered acceptable as the Site would need to be investigated for the presence of considerations that may limit boring and will include utility pipes/cables/tunnels and any transport links. The creation of borehole would be extremely difficult within the existing basement and the number of boreholes would be limited due to the available area.
- 11.21 Air Source Heat Pumps are considered partially applicable for the scheme for the proposed flexible retail (A1/A3) units.
- 11.22 Both biodiesel and biomass are not considered applicable for the site as it requires frequent deliveries, a storage tank and carries additional amenity issues regarding air quality.
- 11.23 In terms of 'Be Green', the Energy Statement demonstrates that the proposed development will achieve a reduction of 58.32% against the Base Case for the total development.

### **Sustainability and BREEAM**

- 11.24 RES have prepared a Sustainability Statement (including BREEAM) which has been submitted in support of this application.
- 11.25 The Sustainability Statement demonstrates how the proposed development will achieve a BREEAM 'Excellent' result. A BREEAM pre-assessment for the development has shown that a score of 75% is achievable. The full BREEAM pre-assessment results sheet has been included within the Sustainability Statement.



## Sustainable Urban Drainage Systems

### Policy

- 11.26 Paragraph 165 of the NPPF (2019) specifies that major developments should incorporate sustainable drainage systems, unless there is clear evidence that this would not be appropriate.
- 11.27 Camden Local Plan Policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible. To achieve this Camden will require development to:
- a) incorporate water efficiency measures; and
  - e) utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible.
- 11.28 Camden Planning Guidance 'Water and Flooding' (2019) states that the Council expects all developments, whether new or existing buildings, to be design to be water efficient by minimising water use and maximising the re-use of water.

### Assessment

- 11.29 Pell Frischman have prepared a Drainage Strategy Report to support this application.
- 11.30 The following options were considered for the drainage of surface water from the proposed development and discounted for various reasons, as set out in Section 4.2 of the Drainage Strategy Report:
- i. Ground infiltration within the site;
  - ii. Large scale attenuation and connection to existing watercourses;
  - iii. Management of land drawings providing interception and storage;
  - iv. Provision of localised storage features; and
  - v. Green/blue roofs.
- 11.31 As per Pell Frischmann's report, it is proposed to provide the following drainage infrastructure:

- i. Sustainable urban Drainage Systems to be incorporated into the design of the site to improve attenuation and reduce run-off; and
- ii. the existing combined sewer will be utilised for both the surface and foul water.

11.32 The SuDS measures to be incorporated within the design of Space House are: soft landscaping in the public realm areas; and a free standing 30m<sup>3</sup> attenuation tank in the basement. All will aid in reducing runoff across the site, improving attenuation, improving building performance and adding ecological value.

### Conclusion

11.33 The proposed development will result in a highly efficient and sustainable building with significant improvement against both the existing building and building regulations compliant baseline. All possible renewable and low carbon energy sources have been carefully considered. Air source heat pumps have been selected as the most appropriate renewable source for the proposed flexible retail (A1/A3) units at the development.

11.34 The proposals are compliant with national, regional and local planning policies CC1 and CC2 regarding energy and sustainability, Policy CC3 regarding water and flooding and Camden Planning Guidance 'Energy Efficiency and Adaptation' and 'Water and Flooding'.

## 12 Amenity

- 12.1 This section assesses the proposals against policy relating to the amenity of nearby existing residents in terms of air quality, daylight and sunlight and noise.

### **Air Quality**

#### Policy

- 12.2 London Plan Policy 7.4 requires that development proposals should be “at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as designated Air Quality Management Areas (AQMAs))”.
- 12.3 Local Plan Policy CC4 requires development to provide air quality assessments where the proposed scheme is likely to expose residents to high levels of air pollution.
- 12.4 Camden Planning Guidance ‘Air Quality’ (2019) states that the Council’s overarching aim is for new development to be ‘air quality neutral’, not lead to further deterioration of existing poor air quality and, where possible, to improve local air quality (‘air quality positive’).

#### Assessment

- 12.5 The Air Quality Assessment, prepared by Hilson Moran, describes the potential air quality impacts associated with the proposed refurbishment and extension of the site. An assessment of construction dust impacts is also provided. Where necessary mitigation measures to minimise impacts have been outlined.

#### *Construction Phase*

- 12.6 A qualitative assessment of the construction phase impacts has been carried out. A low to negligible risk of impacts during the course of the construction phase has been identified.
- 12.7 Measures to mitigate dust emissions will be required during the construction phase of the proposed development in order to minimise effects upon nearby sensitive receptors.

### *Operational Phase*

- 12.8 The Air Quality Assessment has considered the impact of the proposed development on the existing air quality during the operation phase at all existing receptors.
- 12.9 The report concludes that no site-specific mitigation measures are required for the operational phase of the development and that the overall residual effect for the operational phase is not significant.

### Conclusion

- 12.10 The proposed development will comply with regional Policy 7.4 and local Policy CC4 and CPG 'Air Quality' in respect of air quality with the recommended mitigation measure in place (construction phase only) as no mitigation measures are required for the operational phase.

### **Daylight and Sunlight**

#### Policy

- 12.11 The NPPF (paragraph 123) states that local planning authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
- 12.12 Local Plan Policy A1 seeks to manage the impact of development and protect the quality of life of occupiers and neighbours. The council will grant permission for development unless this causes unacceptable harm to amenity. Part (f) of the policy states that factors the council will consider in this assessment include "sunlight, daylight and overshadowing". The supporting text, specifically paragraph 6.5, advises that to assess whether acceptable levels of daylight and sunlight are available to habitable spaces, the Council will take into account the standards recommended in the British Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2011). Camden Planning Guidance 6 supports Local Plan Policy A1.

### Assessment

- 12.13 The daylight and sunlight affecting the proposed development and surrounding properties is considered within the Daylight and Sunlight Report, prepared by Point 2, submitted alongside this application.
- 12.14 A number of detailed assessments have been undertaken on the surrounding buildings that have been identified as having habitable rooms/windows overlooking the site. This has been undertaken in accordance with the BRE report entitled 'Site layout planning for daylight and sunlight: A guide to good practice', more commonly known as 'The BRE Guidelines'.
- 12.15 The technical analysis confirms that there will be no noticeable losses in daylight or sunlight to the surrounding residential properties identified.

### Conclusion

- 12.16 The proposed scheme has been shown to fully comply with current BRE Guidance.
- 12.17 Therefore, in terms of sunlight and daylight, the proposed development accords with Local Plan Policy A1.

## **Noise**

### Policy

- 12.18 Paragraph 123 of the NPPF states that planning decisions should aim to avoid noise giving rise to significant adverse impacts on health and quality of life as a result of new development.
- 12.19 Policy 7.15 of the London Plan states that development proposals should seek to reduce noise by:
- a. Minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals;

- b. Separate new noise sensitive development from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation;
- c. Promoting new technologies and improved practices to reduce noise at source.

- 12.20 Camden Local Plan Policy A4 seeks to ensure that noise and vibration from development is controlled and managed. Planning permission will only be granted for noise generating development where it can be operated without causing harm to amenity. Camden also seeks to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development through this policy.
- 12.21 Camden Planning Guidance Document 6 'Amenity' supports Local Plan Policy A4, setting out when planning applications must be supported by noise reports and what mitigation measures can be implemented to prevent harm to amenity being caused.

### Assessment

- 12.22 It is proposed to place new plant equipment on the roofs of both the Tower and the Kingsway building, as set out at Section 9.0 of the submitted Environmental Noise Survey Report (ENSR), prepared by Hann Tucker, dated May 2019.
- 12.23 The ENSR has determined the existing background sound levels in the vicinity of the site and surrounding noise sensitive premises.
- 12.24 The nearest sensitive facades to the Tower are located along Keeley Street and the nearest noise sensitive facades to the Kingsway building are located on the opposite side of Kingsway to the east.
- 12.25 The ENSR notes that the proposed plant on both the Tower and the Kingsway building is shielded acoustically due to a) the height of the proposed plant, b) the set back of the plant on both the roofs and c) the acoustic screening proposed.
- 12.26 The proposals are shown to comply with the LBC's noise threshold requirements, as set out in Appendix 3, Table C of the Local Plan referenced in Policy A4, without the need for any additional mitigation measures.

## Conclusion

- 12.27 The proposed development will accord with planning policy at all levels in respect of noise and vibration.

## 13 Transport, Servicing and Waste

### Transport

#### Policy

- 13.1 Paragraph 103 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.
- 13.2 Paragraph 148 of the NPPF states that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.
- 13.3 Further to this, paragraph 108 states that plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
- 13.4 At a regional level, London Plan Policy 6.3 states that “development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed”. The policy also indicates that transport assessments will be required in accordance with TfL’s Transport Assessment Best Practice guidance for major planning applications.
- 13.5 Policy 6.9 states that “the Mayor will work with all relevant partners to bring about a significant increase in cycling in London”.
- 13.6 Policy 6.10 indicates that “the Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasising the quality of the pedestrian environment, including the use of shared space principle promoting simplified streetscape, de-cluttering and access for all”.
- 13.7 The Mayor’s Transport Strategy (2010) sets out policies and proposals to achieve the goals set out in the LP providing a vision of London as an exemplary sustainable world city.



- 13.8 At a local level, Local Plan Policy T1 promotes sustainable transport by prioritising walking, cycling and public transport in the borough.
- 13.9 Local Plan Policy T2 seeks to limit the availability of parking and require all new developments in the borough to be car-free.
- 13.10 To assess the overall implications of developments LBC, under policy T4, expects the submission of a Transport Assessment, Delivery and Servicing Management Plan and Construction Management Plan where the implications of proposals are significant.
- 13.11 On 15 March 2019 Camden adopted the 'Transport' CPG which provides information on all types of detailed transport issues within the borough including: assessing transport impact, travel plans, delivery and servicing plans and cycling facilities.

#### Assessment

- 13.12 The site is highly accessible by all modes with an excellent network of footways, cycle facilities and public transport services in the immediate vicinity. The site is located circa 300m south (5 minutes' walk) of Holborn London Underground Station and 500m east (6 minutes' walk) of Covent Garden London Underground Station and has excellent accessibility to several bus routes and TfL's cycle hire docking stations.
- 13.13 In accordance with the NPPF, the proposed development is situated in a highly accessible location (PTAL 6b, the highest possible rating), thereby maximising the opportunities for sustainable transport modes to be used.
- 13.14 Caneparo Associates have produced a Transport Statement (TS), submitted to support this application. For the purposes of their assessment the TS reviews the proposals on the basis of a reasonable 'worst case' scenario'. This scenario assumes:
- i. the ground floor of the Kingsway building and part basement level 1 will come forward as A3 restaurant use, totalling 1,038 sqm;
  - ii. the flexible retail floor space within the ground floor of the Tower building, including extension beneath the canopy on the west side of the Tower building has been assumed as A1 non-food retail use amounting to 331 sqm; and

iii. the flexible Class B1/B1 and events space (sui generis) is Class B1 office.

- 13.15 The proposals will incorporate the provision of 485 cycle spaces which is above the minimum standards required by the London Plan and represents an uplift of 365 spaces at the site, 429 of which will be long-stay secure spaces. The secure long-stay spaces will be delivered in a dedicated cycle parking area at Basement Level 1 with lockers and showers also provided. For additional security each land use will have its own secured area for storage.
- 13.16 A total of 56 short-stay cycle spaces (28 Sheffield stands) are proposed. To prevent a negative impact of excessive short-stay cycle parking provision within the newly created public realm space between the buildings, discussions have been held with Camden regarding the possible location of the cycle spaces across both the site and the public highway. Taking this into account, it is proposed that a total initial provision of 56 short-stay cycle spaces is made external to the buildings. Caneparo Associates consider this to be a quantum that could comfortably accommodate the demand of the site, and future usage could be monitored with further provision made if demand demonstrates this is required.
- 13.17 The site has 48 existing car parking spaces. The proposed development has been designed to only provide 4 car parking spaces (including 1 disabled parking space). The proposals will lead to a reduction of car parking on site by 44 spaces, thereby limiting the level of car parking provided in the development, in line with Local Plan Policy T2.
- 13.18 The proposed development is forecast to generate an additional circa 28 two-way underground trips during the AM peak hour and 33 two-way underground trips during the PM peak hour. When the level of increase is considered against the frequency of services available, this would result in a negligible impact on stations and underground services operating in the vicinity of the Site.
- 13.19 A net increase of 25 two-way rail trips is forecast for the AM peak hour, while for the PM peak hour 67 additional two-way rail trips are forecast. It is considered this level of increase is minor when viewed against the significant level of services arriving and departing mainline rail stations every hour, therefore will not result in a noticeable effect on the rail network.

- 13.20 The proposed development is predicted to generate 8 additional two-way bus trips during the AM peak hour, and 33 additional two-way bus trips during the PM peak hour. When considered against the frequency of the multiple bus services operating in the vicinity of the site, this increase is considered to be negligible and will not result in a material impact on the bus network.
- 13.21 The assessment of the multi-modal trip generation of the proposed development has identified that the vast majority will be undertaken by active and sustainable modes. The net change in trip generation will be minor, and when considered against the wide range of public transport services available in the vicinity of the site, will not result in a material impact on the public transport network. In addition, visitors to the proposed flexible retail A1/A3 units will predominantly be derived from workers and shoppers already in the area and will not therefore be wholly new trips.
- 13.22 The assessment also highlights that while the substantial removal of car parking at the site will result in a reduction in traffic, the additional servicing requirements of the increase in floor space will result in a minor increase in vehicle trips. This increase will be minor and will not result in a noticeable effect on the surrounding highway network. Servicing is assessed in greater detail from paragraph 13.30 of this Town Planning Statement.
- 13.23 The provision of additional cycle parking spaces is also expected to generate an uplift in cycle trip generation arising from the development, amounting to circa 40 additional cycle movements across the day.
- 13.24 The Framework Travel Plan (FTP), prepared by Caneparo Associates, submitted as an Appendix to the TS, seeks to put in place the management tools deemed necessary to enable the employees and visitors to make more informed decisions about their travel, which at the same time minimises the adverse impacts of their travel on the environment.
- 13.25 The FTP aims to achieve a 5% modal share increase for active modes (walking and cycling) for employees.

13.26 The following measures and initiatives are suggested to encourage sustainable forms of travel:

- production of staff induction packs;
- site management company emails;
- site notice boards;
- Staff newsletters; and
- Company internet/intranet sites.

13.27 To ensure that the FTP is followed a Travel Plan Co-ordinator (TPC) will engage with occupiers to promote the Travel Plan. An Action Plan is included at Table 7.1 of the FTP to explain the actions to be encouraged under the FTP, the responsibility and the implementation of stated actions, targets, funding sources, and timescales for the implementation of the actions.

#### Conclusion

13.28 An assessment of the effects of the development on the local transport network has concluded that it will not result in a material impact on the network.

13.29 The proposals have been shown to comply with national, regional and local transport planning policy.

### **Servicing and Waste Management**

#### Policy

13.30 At a national level, paragraph 35 of the NPPF states that developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies.

13.31 Local Plan Policy CC5 'Waste' seeks to make Camden a 'low waste' borough. In order to achieve this, the council requires developments to include facilities for the storage and collection of waste and recycling.

## Assessment

- 13.32 The Delivery and Servicing Plan, prepared by Caneparo Associates and appended to the TS, will ensure the successful operation of servicing activity on a day to day basis. The DSP will ensure that the likelihood of vehicle conflicts with pedestrians and other vehicles will be minimised and that the servicing of the site will not affect the free flow or environmental condition of the public highway.
- 13.33 Servicing for the proposed development will be undertaken from a dedicated delivery area located within the northern section of the Site, with vehicular access via Keeley Street.
- 13.34 The proposed development will result in an uplift of 23 servicing vehicles (one-way) per day when compared with the existing development, which equates to approximately 12 additional Class A3 retail deliveries, 2 additional Class A1 retail deliveries and 9 additional office deliveries per day when based on the indicative 'worst case' floor area split. Table 3.2 of the submitted DSP provides a breakdown of the management of the servicing area throughout the day. It is forecast that the servicing area will be maximised for the three-hour period 09:00 – 13:00, with usage lower outside of these times. A management system will be put in place to oversee servicing for the office to ensure its smooth operation.
- 13.35 Aecom's 'Operational Waste and Recycling Management Strategy', submitted in support of this application demonstrates how sustainable methods for waste and recycling management have been considered for the operational phase of the proposed development.
- 13.36 A single combined waste store has been designed at basement level 2 which will provide sufficient space to hold bins to manage the compacted waste arisings from all the commercial elements of both blocks. On a daily basis (or as agreed) the building management team will collect waste from all the commercial units (that will provide sufficient space within their curtilage to hold waste in small bins) and carry this waste to the waste store via service lifts provided within the Tower and Kingsway block, where this waste will be compacted and stored in separate bins.
- 13.37 It is proposed that a private contractor would be commissioned to undertake the collection of waste from the proposed development and is envisioned that the collection will take place after the working hours of all commercial units to avoid any

disturbance to the users of the Proposed Development and to maintain the aesthetics of the proposed development.

- 13.38 Prior to the collection time (or as agreed), the building management team will transfer waste bins for the stream scheduled to be collected on the day to the waste presentation area located on the Ground Floor (i.e. within 10 m of the collection point). From this area, the collection operatives will drag the bins to the refuse collection vehicle for emptying purpose. Once, these bins have been emptied the building management team will return them their respective waste stores.
- 13.39 Paragraph 1.10 of Aecom's report states that the implementation of the strategy as set out in the report will ensure that the development, once operational, will be managed in accordance with the relevant waste regulations.

#### Conclusion

- 13.40 The proposals are fully compliant with both national and local planning policy in terms of servicing and waste management.

### **Construction Traffic Management**

#### Policy

- 13.41 Local Plan Policy T4 seeks to minimise the impact of the movement of goods and materials by road. In order to achieve this LBC will:
- a) encourage the movement of goods and materials by canal, rail and bicycle where possible;
  - b) protect existing facilities for waterborne and rail freight traffic and;
  - c) promote the provision and use of freight consolidation facilities.
- 13.42 Moreover, Paragraphs 10.34 and 10.35 set out the roads that heavy goods are expected to be transported along and suggests that the impact of goods vehicles can be reduced where a loading and unloading bay is included within a development, particularly where the bay can be enclosed. Developments should therefore incorporate space within the site for goods vehicles.

Assessment

- 13.43 The supporting draft Construction Management Plan (CMP), prepared by Aecom, submitted with this application follows the LBC's pro forma.
- 13.44 A final CMP will be prepared for submission to and approval by Camden once a principal contractor for the development has been appointed. The proposed development will therefore be conducted in a manner that accords with local planning policy requirements.

## 14 Planning Obligations

- 14.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 14.2 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, as amended, and paragraph 204 of the NPPF, a planning obligation should only be sought where they meet all of the following tests:
- a) Necessary to make the proposed development acceptable in planning terms;
  - b) Directly related to the proposed development; and
  - c) Fairly and reasonably related in scale and kind to the proposed development.
- 14.3 Paragraph 54 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 14.4 Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects (Paragraph 55 NPPF).
- 14.5 Under Policy 8.2 of the LP 'Planning Obligations', boroughs should include appropriate strategic as well as local needs in their policies for planning obligations.
- 14.6 Policy 8.2 states that negotiations should seek a contribution towards the full cost of all such provision that is fairly and reasonably related in scale and kind to the proposed development and its impact on a wider area.
- 14.7 As set out in Camden Planning Guidance 'Developer Contributions', the use of planning obligations is an important tool in managing the impacts of development and assisting the delivery of necessary infrastructure to support Camden's and London's current and future needs to meet the strategic objectives of the Local Plan.



14.8 The use of planning obligations is specifically required through Local Plan policy DM1 'delivering and monitoring' although a whole range of individual development policies may be used to justify an obligation.

14.9 Local Plan Policy DM1 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate, to; support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development; and mitigate the impact of development.

14.10 The anticipated planning obligations for this development are:

- Financial contribution in lieu of residential provision;
- Construction management plan (plus monitoring fee);
- Energy/Sustainability Statement;
- Highways contribution for any necessary highway works; and
- Travel plan (plus monitoring fee).

### **Community Infrastructure Levy (CIL)**

14.11 LBC adopted its Community Infrastructure Levy in April 2015.

14.12 The site is located within CIL Charging Zone A (Central). Therefore the development will be liable to pay the following:

- Office - £45/sqm
- Retail (including bar/restaurant/entertainment and other town centre uses) - £25 (not relevant as uses have been applied for flexibly with Class B1 use, therefore the CIL liability has been calculated on a 'worst case' of £45/sqm).

14.13 MCIL2 came into effect on 1 April 2019.

14.14 A completed CIL form has been submitted with this application.

## 15 Summary and Conclusions

- 15.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 15.2 This Planning Statement has assessed the proposals against the development plan, relevant statute and other relevant, planning policy and guidance at national, regional and local policy level.
- 15.3 The proposed development has been subject to thorough pre-application discussion with local residents, businesses, Camden officers, HE and other interested third parties. The applicant has sought at all times to consider and incorporate responses received.
- 15.4 The application presents an exciting opportunity to refurbish the listed building to the highest architectural quality, meeting the statutory tests in terms of protecting the historic built environment whilst also delivering efficient fit-for-purpose modern office floorspace to meet market demand and contributing to improving the public realm by activating existing 'dead' frontages through the introduction of flexible retail A1/A3 use along a key Central London thoroughfare and redesigning the public realm.
- 15.5 The proposals have been developed to be sensitive and respect the listed building and surrounding conservation area and the typical scale of the surrounding buildings and will deliver the following public benefits:
  - i. A contribution to the regeneration and transformation of the area;
  - ii. Sustainable reuse and regeneration of buildings which no longer meets modern office user requirements;
  - iii. Delivering sustainable development through improvements in energy efficiency;
  - iv. High quality design, contributing to the wider townscape and conservation area setting and local streetscene; and

- i. Contributing to the function and character of the area through the provision of new active public uses at ground floor level to reactivate street frontages.  
Enhanced public realm with vibrant and active frontages;
  - ii. Refurbishment of two listed buildings to ensure their longevity and vitality;
  - iii. Contextual, high quality extensions to both buildings to provide new class B1 office floorspace;
  - iv. Removal of car parking and provision of cycle parking and end of journey facilities in accordance with the draft London Plan;
  - v. Removal of unsightly rooftop plant visible in long views and provision of energy efficient plant and sustainability features within a plant enclosure;
- 15.6 The proposal demonstrates that it satisfies statute and satisfies and exceeds planning policies at national, regional and local levels.
- 15.7 The application accords with national, regional and local policy objectives to deliver sustainable, mixed use and balanced communities and should therefore be approved.