



Heritage, Design & Access Statement

65 Kingsway, Camden

On behalf of Arena 8

June 2019 | Project Ref. 00068 | V.1



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HERITAGE



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Introduction

1. This Heritage, Design and Access Statement has been prepared on behalf of Arena 8 and accompanies an application for Listed Building Consent and Planning Permission at No. 65 Kingsway (The Site). The Statement informs Camden Borough Council (CBC), as decision makers, of the history, development and significance of No. 65 Kingsway and its environs, namely the heritage assets potentially affected by the proposals.
2. No. 65 Kingsway, also known as Kodak House, is Grade II listed (List Entry Number 1379260). The Site is also located in the Kingsway Conservation Area and is within the setting of a number of neighbouring listed buildings (see Figure 1, next page)
3. No. 65, situated on the western side of Kingsway between Keeley Street and Wild Court, was built in 1911 for use as offices by the Kodak company. The Site and has a long established commercial use and Listed Building Consent has recently been applied for and approved for 'Refurbishment of basement space for gym with installation of mezzanine and services and removal of infill masonry' (ref: 2018/3024/L) and to 'Replace 4 no. existing columns with new structural frame' (ref: 2019/1897/L).
4. The proposed changes covered in this heritage statement and requiring listed building consent and planning permission are limited to the Keeley Street elevation at ground floor level and seek replacement of the existing glazed screen and door with slight variation to its design.
5. Within this statement a summary of significance is presented. This summary has taken account of the significance of the heritage asset together with the effects of the proposed changes on that significance. The proposed changes will be considered against relevant planning policy and legislation and it will be demonstrated that the changes accord with core principles by sustaining the significance of the affected heritage assets.

Application Site

No. 65 Kingsway

- No. 65 Kingsway is a six storey office block with later attic storey that fronts onto Kingsway. Built for the Kodak Company in 1911 to the designs of John James Burnett, the building originally contained a shop, offices, a warehouse, storerooms, dark rooms and printing rooms for the photographic company, though is now predominantly in office use, with a café and shop at ground floor level of the Kingsway elevation.
- The Kingsway façade, the principal elevation, is clad in Portland stone on a Norwegian granite base whilst the subservient side elevations to the Wild Court and Keeley Street sides are faced in white glazed brick and heather red bricks respectively. The application site, located on the Keeley Street side, has undergone a number of recent alterations, detailed in Paragraph 9

Location & Context

- No. 65 Kingsway encompasses Nos. 61-65 and is sited approximately half way along the west side of Kingsway, with the axial footprint of the building bordered by Wild Court to the north and Keeley Street to the south. The busy thoroughfare of Kingsway is characterised by its broadness and the prestigious commercial buildings built in a neo-classical style. Wild Court and Keeley Street are much narrower and enclosed side roads that provide breaks in the facades along Kingsway and glimpses of adjacent areas.

Development Summary

- No. 65 Kingsway has an extensive planning history and has undergone various internal and external changes during the 20th and 21st centuries. A number of the consented alterations have involved the ground floor façade of the Keeley Street elevation, demonstrating the property's ability to absorb change without detriment to the significance of the listed building and conservation area.

TP14637/2919 - *The carrying out of alterations and improvements, including the installation of a new shop front and the formation of an access to Keeley Street at Kodak House, Nos. 61-65 Kingsway, Holborn.* Granted. 03-05-1960

2015/4096/P - *Change of use of part of ground floor from office use (Class B1a) to retail use (Class A1) and change of use of part of the basement from office use (Class B1a) to a mixed use of retail (Class A1), restaurant/cafe (Class A3), drinking establishment (Class A4) and assembly and leisure (Class D2); reinstatement of external door on south-east corner of building; provision of new entrance to basement on Keeley Street elevation; and associated works.* Granted. 13-08-2015

2015/4654/L - *Reinstatement of external door on south-east corner of building; provision of new entrance to basement on Keeley Street elevation and internal alterations in association with a change of use of part of ground floor and part of basement.* Granted. 13-08-2015



Figure 1: Plan view of 65 Kingsway, Delineated in red. Neighbouring listed buildings denoted by blue triangles.

Site Development



Figure 2: 1915 photograph of Kodak House showing original appearance and arrangement.



Figure 3: Close up of 1915 photograph, detailing the application site as it was originally built.



Figure 4: 2014 view of the application site, showing modern glazing to both openings and later metal louvres to the right-hand bay.



Figure 5: 2019 (current) view of the application site, showing changes carried out in 2015.

Assessment of Significance

No. 65 Kingsway

10. No. 65 Kingsway was added to the National Heritage List for England in September 1971. The list description describes the special architectural and historic interest of the building:

Office block, incorporating Nos 61 & 65. c1911. By Sir John Burnet and Partners (job architect Thomas Tait) for Kodak; later attic storey. Built by Allen Construction Co. Steel framed construction with Portland stone facing and bronze spandrel panels emphasising the method of structure. Bronze roof canopy with antefixae masks. EXTERIOR: 6 storeys, basement and C20 attic storey. 5 window bays to main frontage, splayed 1 window corner treatment and 7 window bays to return. Windows with post 1973 glazing; originally 6 light casements with leaded panes. Plate glass ground floor frontage. Central doorway with bolection moulded surround and flanked by bronze torches. Plain stone continuous sill at 1st floor level; square-headed recessed windows. Stone pilasters between bays rise from 2nd floor level; they have bases but not capitals and lead flush into the top frieze. Coved stone cornice with band of Greek fret ornament. INTERIOR: has good original staircases, the principal staircase to 1st floor level of marble with bronze handrail. Other features may remain behind partitioning. HISTORICAL NOTE: an early example in London of an office block treated in a straightforward manner. Although a pioneering work of modern design it evolves from an Edwardian Neo-Classical design, stripped of almost all ornament and with a Beaux Arts axial plan. Burnet made a study tour of America in preparation for this project. The detail appears to be by Thomas Tait: despite Burnet's doubts about the lack of usual decoration, the client liked the simplicity. Overall the building derives significance from its architectural and historic values. The list description refers to two separate buildings of which No. 5 Cavendish Place forms a small part. The interest of the building is principally derived from its outward appearance, namely the masonry and architectural detailing from the first floors and above and how they reflect the classical style of the adjacent university building. No. 5 is not of significance in isolation, but rather derives interest as being part of this larger building.

11. Overall the building derives significance from its architectural and historic values. The interest of the building is principally derived from its outward appearance, namely the classic simplicity of its front elevation and entrance. Pevsner in 1957 noted that No. 65 Kingsway was *'the only building of architectural importance in Kingsway. For here is an early example of a commercial building to which the future belonged'*.
12. The Keeley Street side is architecturally subservient to the front elevation, with the shift from Portland stone to red brick denoting this change in hierarchy. A consistency in elevational proportions is however carried round from the Kingsway side to the Keeley Street side. Beyond the front two (stone-clad) bays on the Keeley Street façade the ground floor façade is largely given to services and secondary entrances, with many bays taken up by metal louvres, some of which are original and others inserted at a later date (see paragraph 9). Recent alterations to this area of the exterior, notably the replacement of original louvres and window with a new side entrance in 2017, show that considered change to this area of the building can be readily absorbed by the building without impacting on its significance.
13. The building also derives some significance through its association with its designers, J. J. Burnet (1857-1938) and Thomas Tait (1882-1954), prominent Scottish architects who were noted for a number of buildings in Scotland and England.

Kingsway Conservation Area

14. Kingsway Conservation Area was first designated in June 1981. The area centres on Kingsway and it is from this that it principally derives interest. An extract from the Kingsway Conservation Area appraisal document summarises the character and appearance of the area:
- An outstanding example of early 20th century commercial architecture on a comprehensive scale, whose character contrasts strongly with the gardens and legal precinct of Lincoln's Inn Fields to the east and the smaller buildings of Covent Garden to the west. Individually the buildings provide a range of architectural detail and there is some difference in quality. The whole however is cohesive; a distinct boulevard character was created a century ago and remains largely intact.*
15. No. 65 Kingsway contributes to the character and appearance of the Kingsway Conservation Area through its distinctive façade, yet harmonious form and style. The ground floor façade to Keeley Street, as stated previously is of little heritage interest, and does not contribute to the interest of the streetscape or wider area.

Legislation & Policy

Legislation

16. The relevant legislation is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 with Section 66 covering changes to listed buildings and Section 72 covering changes in conservation areas. Section 66 place a duty on decision makers to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Similarly, Section 72 places a duty on the decision makers and states special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the area.

National Planning Policy Framework

17. The NPPF constitutes policy for local planning authorities and decision-makers, and it is a material consideration in planning decisions. Applications for planning permission must be determined in accordance with the local development plan, unless material considerations indicate otherwise.
18. The statutory duty stated in the 1990 Planning Act to 'have special regard' is transposed into paragraph 189 of the NPPF, with paragraphs 194 and 196 outlining the balancing exercise to be undertaken by decision makers with regards to development involving designated heritage assets resulting in 'substantial harm' or 'less than substantial harm'.

Regional Framework

19. The London Plan 2017 provides the Mayor's spatial development strategy for greater London. As this is strategic policy it is of limited relevance to this application. Policies 7.6 and 7.8 have been duly noted.
20. **London Plan Policy 7.6** relates to architecture and requires buildings to be of the highest architectural quality and of a scale, composition and proportion which enhances the public realm. The policy notes that materials and details should complement the established local character and that the amenity of surrounding areas should not be unacceptably harmed by new development.
21. **London Plan Policy 7.8** indicates that development should be sympathetic to the form, scale, materials and architectural details of heritage assets, and should, where appropriate conserve, restore and re-use heritage assets. The policy requires historic environments such as conservation areas to be preserved and enhanced and development affecting heritage assets and their settings to conserve their significance in a sympathetic manner.

22. **London Plan Policy 7.9** requires the significance of a heritage asset to be assessed when development is proposed and schemes designed so that the heritage significance is recognised, and where possible repaired, restored and put to a suitable and viable use that is consistent with their conservation.

22. Local planning policy is also set out Policy D1 Design, Policy D2 Heritage and Policy D4 Advertisements of the Camden Local Plan 2017. Of relevance within Policy D1, the following points require that development:

A Respects local context and character;

B Preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;

E Comprises details and materials that of high quality and complement the local character.

23. Policy D2 Heritage states that, relating Conservation Areas, The Council will:

E require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;

24. Policy D2 Heritage states that, relating to Listed Buildings, The Council will:

J Resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and

K Resist development that would cause harm to significance of a listed building through an effect on its setting.

25. Policy D4 Advertisements states that, relating to advertisements, The Council will support advertisement that:

A preserve the character and amenity of the area; and

B preserve or enhance heritage assets and conservation areas.

26. The Kingsway Conservation Area Audit provides the most up to date assessment of the character and appearance of the conservation area. The **Guidelines** section of the document provides further guidance on negative features, enhancements and management proposals within the conservation area.

Impact Assessment

27. The proposed scheme discussed in the following section seeks to introduce minor changes to an existing opening on the Keeley Street ground floor elevation of No. 65 Kingsway. It is proposed to remove the existing door, window and stone sill/lintel and insert a new powder coated steel frame (see drawings submitted). The bottom centre and bottom left lights of the frame will comprise double doors and metal louvres will be located above the top glazing bar. The existing doorway and glazing were added 2015, having replaced the original metal louvres, window and stone sill. Also proposed is a small projecting lightbox sign, to be affixed to the upper righthand side of the opening. No internal alterations are proposed.

Impact on the Listed Building

28. The proposed alterations to the listed building will be interacting solely with modern fabric and no historic fabric is proposed to be removed. The site of the proposals is in an architecturally subservient area of the exterior, and is an area that has undergone alteration within the last 5 years. This change utilised modern design and materials. This demonstrates that the ground floor at No. 65 Kingsway and the wider listed building and streetscape are able to readily absorb the form of change discussed in this heritage statement without harming its overall significance.
29. The proportions and finish of the proposed frame will allow it to sit comfortably within its immediate context - it will have a bronze finish, so as to match the existing finish of window frames on the Keeley Street elevation whilst the verticality of existing fenestration at No. 65 will be reproduced in the proposed frame. Door furniture will be limited to discreet narrow profile handles, in order to retain the clean, simple design that characterises the wider building.

30. The proposed lightbox signage will represent a small visual change on an architecturally subservient area of the listed building, the design of which is restrained and simple and in keeping with the character of the listed building. The installation and appropriateness of small projecting signs at No. 65, has been established, with the examples approved at the corner of Keeley Street and Kingsway (in a more prominent location than that of the proposed in this heritage statement). As such the proposed signage will preserve the significance of the listed building.

Impact on the Conservation Area

31. In terms of impact on the character and appearance of the Kingsway Conservation Area, the proposed changes to the opening and projecting sign will result in a negligible change and significance will be preserved. The design of the new opening has taken into account and responds to the character of existing openings displayed on No. 65 and in the wider area, whilst the principle of projecting signs has already been established, demonstrating this form of change.

Impact on Nearby Listed Buildings

32. The proposed opening and signage at No. 65 Kingsway will result in a minimal change within the setting of nearby listed buildings, the nearest being the Grade II listed Space House (now the Civil Aviation Authority House), opposite the Keeley Street elevation. The setting of this listed building and how it contributes to its significance will not be affected. No other nearby listed buildings have a visual relationship with the Keeley Street elevation.

Access

33. The proposal does alter the existing access arrangement, with a single door being replaced by another single door, opening directly to the pavement.

Policy Compliance & Conclusions

Policy Compliance

34. This statement is considered to have provided the decision-makers with a proportionate level of assessment of the assets affected, in accordance with paragraph 189 of the NPPF. It is demonstrated that the proposals will preserve the architectural and historical interest of the listed building.
35. In terms of the NPPF, no harm has been identified to the listed building, conservation area or nearby listed buildings and the proposals will therefore not engage paragraphs 194 and 196. The proposed alterations to the ground floor elevation are in keeping with the character and heritage interests of the listed building and conservation area and will preserve their significance.
36. The proposals accord with the policy set out within the London Plan (2017). There is no compromise of local character and the heritage assets affected are conserved. These minor alterations also allows continued and appropriate use of the building.
37. In accordance with Policies D1, D2 and D4 of Camden's Local Plan, the proposals will introduce changes to a subservient and already altered part of the listed building and will sustain its overall significance. The proposals seek to preserve and complement the special interest of the affected heritage assets and would respect special interest of the listed building and the character and appearance of the conservation area.

Conclusions

38. This Heritage, Design and Access statement has undertaken an assessment of the significance of the application site, No. 65 Kingsway. This has been followed by an appraisal of the effects of the proposals on the significance of the heritage assets - the listed building at No. 65 Kingsway and the Kingsway Conservation Area, with consideration given to local and national policy and guidance.
39. In terms of the existing site, the ground floor opening is of very limited heritage interest, contributing little to the overall significance of the listed building and conservation area. Instead the application site derives interest from forming part of the wider building. As such the proposals have sought minor changes that will not detract from the overall special interest of the listed building or conservation area.
40. In terms of impact, the proposals would be undertaken in a subservient and already altered area of the building, and they are in keeping with the design and development of the wider building. As a result, the proposals will preserve the significance of affected heritage assets. The access arrangement will also not be affected by the proposals.
41. The proposals have been assessed against the policy and guidance set out within the 1990 Act, the NPPF and Camden's Local Development Framework. This assessment concludes that the proposals accord with the policy and guidance and offer changes that will preserve the significance of the listed building and conservation area.