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KOKO - 1A Camden High Street

HERITAGE STATEMENT and DESIGN AND ACCESS STATEMENT

For Listed Building Consent Application
Proposed Works for Permanent Structural Support for the Dome Bar and Alterations to the Dome

July 2019

INTRODUCTION

1. On the 2nd May 2018, consent was granted for alterations to the above site (2017/6058/P and 2017/6070/L). The consented scheme includes the following:

   "Redevelopment involving change of use from offices (Class B1) and erection of 5 storey building at the corner of Bayham Street and Bayham Place to provide pub at ground floor and private members club (Class Sui Generis) on upper floors following demolition of 65 Bayham Place, 1 Bayham Street (façade retained) and 74 Crowndale Road (façades retained), including enlargement of basement and sub-basement, retention of ground floor and basement of Hope & Anchor PH (Class A4), change of use at 1st and 2nd floor from pub (Class A4) to private members club (Class Sui Generis), mansard roof extension to 74 Crowndale Road, creation of terraces at 3rd and 4th floor level, relocation of chillers and air handling unit to 3rd floor plant enclosure with additional plant (5x a/c condensers and 1 cooling unit) at roof level, erection of glazed canopy to Camden High Street and Crowndale Road elevation and erection of 4th floor glazed extension above roof of Koko to provide restaurant and bar to private members club (Sui Generis)."

2. Following this, on the 15th September 2018, planning permission and listed building consent (2018/4035/P and 2018/4037/L) was granted for amendments to the above consent, *"namely to allow enlargement of basement and sub-basement, 3 fresh air grilles to Crowndale Road elevation, acoustic louvre to ground floor of Bayham Place (to serve plant room below), alteration to door between function room and 'artists gallery' at first floor, replacement of sliding with folding doors to Sky Lobby, alterations to the fourth-floor terrace and other minor alterations."*

3. During a site inspection by the Project's Structural Engineers (Heyne Tillet Steel – HTS) on 12th June 2018 it became evident that '*the existing truss which supports the dome and the*

western roof of Koko nightclub has suffered from severe corrosion, probably caused by water ingress over the life of the building'[1]. There is a risk that the corrosion may lead to the truss' failure[2].

4. As a result of these site inspections, temporary props were designed by Contractor Design Solutions (CDS) and were installed by Tower Demolition in end-July 2018 and mid-October 2018 to support the loads from the dome and the roof. These props were installed as an emergency procedure to make the building safe, considering the fragility of the truss, and the danger to Life and Public Safety.

5. On 2nd October 2018, a meeting was organised with the Conservation Officer of LB Camden (Colette Hatton). The Conservation Officer agreed that the temporary measures can be dealt with as a Retrospective LB Application. Subsequently, on the 25th February 2019 an application for retrospective Listed Building Consent was registered for temporary propping to the existing roof truss. The application was consented on 15th May 2019. It was agreed that a subsequent application for the permanent truss replacement works would follow in due course.

6. Since the beginning of 2019 additional structural investigation and condition surveys have been undertaken. These surveys have shown that additional structural support and improvement works are required within the listed building to enable the safe implementation of the consented dome bar. This application seeks Listed Building Consent for these necessary additional works. These works include:

    a) installation of the permanent truss replacement works and subsequent removal of the temporary props;

    b) installation of additional PFC steel posts to the inside face of the piers between first floor and roof level to support the increased load of the consented dome bar; and

    c) installation of necessary insulation to upgrade the thermal and acoustic performance of the dome roof to enable the use of the space as a bar. These works will also include replacing the existing copper roof which is beyond repair, with new copper cladding.

7. The proposals and their potential impact on the historic fabric and special character of the Grade II listed building are outlined in detail in the 'Proposals and Assessment of Impact' section below. It also includes a policy justification for the works. For further information on the history and context of the subject site, please refer to the Heritage Statement produced in support of the main application (2017/6058/P and 2017/6070/L).

[1] HTS' Interim Inspection Report dated 27.07.2018 (Truss Inspection) – the document sets out the condition and the risks associated with the corrosion of the historic truss.

[2] A full detail of the recorded defects can be found in the following previous Heyne Tillett Steel reports submitted as part of this LBC application.:

- HTS Site Visit Report No. 10 – Dated 12/07/18
- HTS Site Visit Report No. 11 – Dated 07/08/18
- HTS Site Visit Report No. 12 – Dated 16/08/18
- HTS Interim Truss Inspection Report – Dated 27/07/18

CONTEXT

8. KOKO, originally named Camden Palace Theatre, is a grade II listed building located within the Camden Town Conservation Area, in the London Borough of Camden. The buildings at Bayham Street and Bayham Place and The Hope & Anchor pub are part of the proposals under the aforementioned consented scheme. The buildings are adjacent to the rear of the theatre. They are not included in the grade II listing, but are 'positive contributors' in the Camden Town Conservation Area Appraisal, 2007. KOKO is an internationally renowned music venue and a significant contributor to Camden's cultural identity.

9. The consented works that are most relevant to this application comprise the conversion of KOKO's dome to be used as a member's bar.

RECORDED DEFECTS

10. HTS have routinely monitored the building fabric. The full details of the defects relating to the existing dome truss can be found in the documents listed below. The survey work demonstrates that the existing dome truss is at the end of its life span and no longer structurally sound.
    - HTS Site Visit Report No. 10 – Dated 12/07/18
    - HTS Site Visit Report No. 11 – Dated 07/08/18
    - HTS Site Visit Report No. 12 – Dated 16/08/18
    - HTS Interim Truss Inspection Report – Dated 27/07/18
    - HTS Roof Truss Summary Note – Dated 14/12/18

11. HTS also carried out investigations to the piers on KoKo's main west elevation to better understand their structural make-up. Minimal and discreet opening up works were agreed by email with Camden's Conservation Officer on 27th February 2019 to allow for this structural investigation to take place. The investigations revealed that these piers are purely masonry and do not contain any supporting steel columns. The structural engineer's surveys concluded that the masonry piers in their current condition cannot be shown to safely carry either the existing or increased loading of the consented dome bar. As such, options were considered to devise a new alternative load path and ensure that this carries the additional load imposed on the structure whilst also ensuring minimal physical and visual impact to the listed building. The proposed solution is the installation of PFC steel posts to the inside face of the piers between first floor and roof level. Full details on the investigative works to the front elevation piers can be found within:
    - HTS Support to Front Piers Report – Dated 02.05.19

12. An independent condition survey of the copper dome was undertaken on 18th March 2019 by a Technical Consultant of the Federation of Traditional Metal Roofing Contractors (FTMRC). This survey concluded that the existing copper dome has reached the end of its useful life and is beyond repair, recommending that the copper is stripped and replaced. Full details of the condition survey are included within:
    - FTMRC, Commission Independent, Site Inspection, Technical Assessment and Report on the Copper Dome installed on the roof of KoKo Building – March 2019.

PROPOSALS AND ASSESSMENT OF IMPACT

The following provides a summary of the proposed works and their potential impact on the significance of the listed building. It should be read alongside the scheme drawings prepared by AHA and submitted as part of this application.

Permanent Truss Replacement Works

Proposals

13. In order to prepare possible solutions for the proposed strengthening works of the existing dome truss, HTS undertook detailed condition assessments of each of the existing members and connections. The installation of the member's bar within the dome will result in a higher super imposed dead and imposed load to the roof and structure below. The support to the roof must be stiff enough to prevent any discomfort from vibration in the dome bar. Three options were considered to permanently support the roof; these are outlined in detail within HTS's report[3] and included: enhancement of the existing truss to support proposed loads; fabricated steel I beam; and a fabricated steel truss.

14. The proposed permanent solution is to replace the existing corroded truss with a replica steel truss. The new truss would be installed in sections and the historic corroded truss would then be removed.

15. The location of the proposed new truss will be in the same place as the existing truss; please refer to the drawings prepared by Archer Humphryes Architects Ltd (AHA), marking the location of the proposed truss and removal of the temporary props, and the following HTS reports:
    - HTS Site Visit Report No. 10 – Dated 12/07/18
    - HTS Site Visit Report No. 11 – Dated 07/08/18
    - HTS Site Visit Report No. 12 – Dated 16/08/18
    - HTS Interim Truss Inspection Report – Dated 27/07/18
    - HTS Roof Truss Summary Note – Dated 14/12/2018

16. The possibility of installing a new truss adjacent to the existing historic truss was also explored, thus retaining the historic truss in situ. However, to allow this approach to be structurally sound, new columns would be required to be chased into the main west wall of the building from Ground to Fourth floor. This would result in the removal of historic masonry from the west wall and would thus have a greater physical impact on the listed building. Furthermore, given the severely corroded condition of the existing truss, it would still be at risk of failing regardless of not supporting any additional loading and therefore its retention in situ would remain a health and safety risk.

17. The temporary props will be removed when the replacement truss will be installed (expected 2019). Following this, any areas that were cut into to accommodate the props will be made good. Any new materials and finishes will match the existing like-for-like.

18. The decorative areas that have been affected are on the Ground and First floors. Some of the plasterwork has been cut at the prop junctions. This will be remediated, and a fibrous

[3] HTS Interim Truss Inspection Report – Dated 27/07/18

plaster conservation specialist will be consulted to take samples and ascertain the exact materials to carry out the repairs.

Assessment of Impact

19. Impact to the existing fabric is principally limited to the removal and replacement of the existing dome truss. Whilst the existing truss is historic, it survives in a severely damaged and corroded condition, as outlined within the accompanying reports by HTS. The existing truss is therefore no longer fit for purpose to support the higher super imposed dead and imposed load to the roof and structure below and it is at risk of failing completely. As outlined within the 'HTS Interim Truss Inspection Report (27/07/18)', the poor condition of the existing truss and in situ working conditions mean that it is not possible to carry out enhancement works to retain the existing truss and thus replacement with a replica remains the only feasible and safe option. The proposed new truss will be placed in the same location as the existing truss which will be removed. As such, the proposed works will be concealed from view from inside the listed building.

20. The existing temporary props for the dome will be removed as part of the installation of the new permanent truss. The temporary posts required the cutting away of small areas of decorative plasterwork on the ground and first floors. As this was localised to the structural junctions, the removal of fabric was limited. Once the temporary structure is removed, the plaster will be repaired and the original decorative scheme will be replicated to match the original scheme.

21. This proposed replacement truss is an unavoidable structural and health and safety intervention to enable both the installation of the consented member's bar within the dome and the long-term preservation of the listed building. Whilst removal of the existing historic truss will have an adverse impact on the listed building, the truss survives in a severely corroded state and there is a risk that the corrosion could lead to the truss' failure which could result in damage to the listed building. The proposed new truss will replicate the historic truss and will be concealed from view. It is thus considered that the proposed works will result in a negligible degree of less than substantial harm which is limited to an isolated area and is unavoidable for the implementation of the consented scheme (2018/4035/P and 2018/4037/L) and the long-term preservation of the listed building. Importantly, the overall special architectural and historic interest of the listed building will remain fully appreciable.

Installation of Supportive Steel PFCs

Proposals

22. Additional structural surveys/investigations revealed that the existing piers to the west elevation are purely masonry and do not contain any supporting steel columns. Given the increased loading of the consented dome bar, HTS have advised that the existing piers will not be able to safely carry the additional load. This represents both a structural and health and safety issue and a proposal has thus been designed to create a new alternative load path which is sensitive and appropriate in listed building terms.

23. The proposed solution includes the installation of four new PFC steel posts close to the inside face of the western elevation piers between First floor and roof level; please refer to the drawings prepared by AHA and the following HTS report:
    - HTS Support to Front Piers Report – Dated 02.05.19

24. The additional load from the dome bar will be jacked into the proposed PFCs to ensure that they carry their proportion of the applied load. A transfer beam below the roof level soffit will transfer loads from the new dome floor beams and distribute the load into the four PFC posts. The dome floor beams and the transfer beam have already been consented as part of a previous application.

25. The steel posts are 200mm wide x 90mm deep channel sections installed close to the piers in section and central to the piers in elevation. The dimensions of the PFCs have been minimised as far as possible to reduce their visual impact within each of the rooms.

26. On all floors, the proposed PFCs will be neatly boxed in, plastered over and painted to match the rooms. On the First floor, decorative fibrous plaster will be carefully removed and reinstated /replicated to match the existing decorative scheme. When boxed in the PFCs will be 235 wide x 130mm deep.

Assessment of Impact

27. The proposed four additional PFCs will be installed from First to Fourth floor. The two central PFCs will be installed close to the inside face of the western elevation piers but will not be chased into the wall, therefore ensuring that no historic fabric from the brick piers will be lost or disrupted. Furthermore, these two PFCs cannot be chased into the wall as their purpose is to transfer the load of the dome bar from the main west elevation to ensure its structural stability.

28. The two PFCs at the north and south ends of the west elevation will be set-back from the main west elevation wall and chased into partition walls on some floors (see proposed drawings for details). Whilst this will result in the removal of some existing fabric, this fabric is not of high significance and this is a necessary and unavoidable intervention to ensure the structural stability of the dome. This will therefore have a negligible impact on the listed building.

29. Incisions will be made through the ceilings at First, Second and Third floor to connect the PFCs to the already consented transfer beam below the roof level soffit. At Second and Third floor the holes will be made through plain modern plasterboard ceilings that are of no significance.

30. At First floor the PFCs will meet the existing ceiling beams which have decorative fibrous plasterwork and which will be intersected by the new columns. The existing decorative plasterwork (see Figures 1 and 2 in Appendix 1) will be carefully removed and reinstated on the beams, in a position which is the same as the existing but slightly further back along the beam to allow for the PFC. The condition of the existing decorative plasterwork will be assessed by an appropriate fibrous plaster conservation specialist and if it cannot be removed and reinstated, a replica will be made to match the existing design like-for-like. As such, the installation of the PFCs at First floor will have a minor adverse physical impact on

a small area of the historic plasterwork on the ceiling beams. Loss of the historic fabric will be avoided as far as possible and the existing historic plaster will be reused wherever possible. Given that the existing decorative plasterwork on the ceiling beams will be reinstated/replaced in a very similar location, the visual impact will be negligible. Drawing **AHA/KKC/GA/101-10** for provides further details of the proposed PFCs at First floor.

31. The dimensions of the PFCs (200 x 90mm) has been minimised as far as possible to reduce their visual impact within each of the rooms. The PFCs will be neatly boxed in, plastered over and painted to match each room, further reducing their visual impact. The overall dimensions following encasement will be 235 x 130mm. On First floor this will include replicating the existing dado rail, skirting and cornice over the PFCs to retain these features and minimise the visual impact of the proposal (see **AHA/KKC/GA/101-10)**.

32. Overall the PFCs will result in a minor adverse impact on the listed building through the removal of some decorative plasterwork on the First floor. However, the overall visual impact of the PFCs will be negligible due to their small size and ensuring that the finishes match each room. Decorative plasterwork at First floor will be carefully removed and reinstated or replicated where this is not possible. The installation of the PFCs is fundamental to safely support the additional load of the consented dome bar. The proposed solution is the most sensitive in listed building terms and whilst it will have a minor adverse impact on the listed building, this is isolated to a small area and the resulting harm will be less than substantial and negligible.

Copper Dome – Insulation and Replacement Copper Roofing

Proposals

33. The proposed works include the replacement of the existing copper cladding on the dome. The existing copper is at the end of its useful life and survives in a poor condition, beyond repair. Details of the condition of the copper roofing is included within the FTMRC report[4].

34. The Approved Inspector has also advised that the roof of the dome bar will need to have improved acoustic and thermal properties to allow for the new use of the space as a bar. The proposals therefore include the installation of 35mm triple-foil insulation (which compresses to 10mm) and a ventilated void between the existing timber sarking boards and the copper roof covering. In all, the necessary proposed insulation and ventilation void will result in a build-up of approximately 64mm.

35. All timber trusses and sarking boards will be treated for class 1 spread of flame rating with a fire-retardant coating for timber.

36. Refer to drawing **AHA/KKC/DET/601** for details of the dome copper cladding and insulation.

37. The previously consented scheme (2018/4035/P and 2018/4037/L) included permission for the removal of the existing iron ladder on the copper dome which is beyond repair. The previously consented scheme further included the installation of a new ladder in a similar

[4] FTMRC, Commission Independent, Site Inspection, Technical Assessment and Report on the Copper Dome installed on the roof of KoKo Building – March 2019

location on the dome. This ladder is not required for maintenance access and it is now proposed to not install a new ladder on the dome.

Assessment of Impact

38. The proposed new copper cladding will appear brown at first but over time will naturally patinate and turn green as the existing copper cladding has done. The proposed batten seams to the copper will also match the existing profiles. Whilst there will initially be a change in colour to the dome, the patination process is part of the natural properties of copper and over time the dome will turn green to match the existing patination which is over 100 years. The existing cladding is well beyond the end of its life and overall replacement is the best option both in terms of weatherproofing functionality and aesthetically. As the proposed material will match the existing, the replacement of the copper dome cladding is considered to have a neutral impact on the listed building.

39. The proposed 35mm triple-foil insulation (which compresses to 10mm) and a ventilation void between the existing timber sarking boards and the new copper roof covering, will be created to improve the acoustic and thermal properties of the dome. This is as per the Approved Inspector's advice and is required for the new use of the dome as a bar. The new insulation and ventilation will be located between the existing timbers and sarking boards of the Dome (which will remain exposed as per the original consent) and the copper roof covering (see Figure 3, Appendix 1). As such, the proposal will have no visual impact from within the dome bar. In all, the necessary proposed insulation and ventilation void will result in a build-up of approximately 64mm thus resulting in a very slight change in the overall roof profile. However, given the large size of the dome this minor increase is unlikely to be appreciable from street level or the adjoining properties and will not alter the overall composition or character and appearance of the roof. The impact of these works will therefore be negligible and result in no harm.

40. The existing timber sarking boards and timber trusses of the Dome will remain exposed as per the original consent. Where original sarking boards are missing or damage beyond repair, these will be replaced like-for-like with new boards of the same timber and dimensions. All timber trusses and sarking boards will be treated for class 1 spread of flame rating with a fire-retardant coating for timber. This coating dries clear and will result in no visual change to the timbers.

41. The proposal also seeks permission to no longer install a new ladder to the copper dome, as was consented under the previous application (2018/4035/P and 2018/4037/L). This ladder is not required for maintenance of the dome and it is considered that removal of the proposed new ladder will have an overall beneficial visual impact on the listed building through removing visual clutter.

Design and Access Assessment Summary

42. The section below describes how the proposal affects different aspects of the site including layout, use, scale, landscape and context, appearance and access.

- **Layout:** the proposal will not alter the existing layout. The proposed truss will replace the existing corroded truss and will be placed in the same location. The temporary props that currently prop the existing truss from Ground to Fourth floor will be removed, thus returning these rooms to their original layout. The PFCs will be installed close to the inside of the west wall and are of modest dimensions. Whilst they will have some visual impact on each of the rooms (discussed in further detail in the following section), they will not impact the layout of building.
- **Use:** not affected by the current proposals.
- **Scale:** not affected by the current proposals.
- **Landscape and Context:** not affected by the current proposals.
- **Appearance:** part of the decorative plasterwork on the Ground and First floors have been cut out to allow for the positioning of the temporary props in correspondence with the location of the truss. This will be repaired by a specialist once the props are removed, leaving the aesthetic of the rooms intact and in keeping with their historic character. The proposed new permanent truss will be installed in the same location as the existing corroded truss; it will therefore be concealed from view and will not impact upon the building's appearance.

  The PFCs will be discreetly located and decorated to match the rooms that they are in. At First floor the existing dado rail, skirting and cornice will be replicated on each PFC to minimise their visual impact. The existing decorative plasterwork on the beams which will be disrupted by the PFCs will be carefully removed and reinstated or replicated to match the existing. This will be positioned slightly further back on the beam to its existing position and adjacent to the PFCs, resulting in a minor visual change but ensuring that the existing decorative scheme and overall appearance is retained.

  The replacement of the existing copper cladding which is at the end of its useful life and beyond repair, with new copper cladding will result in a visual change to the dome. The new copper cladding will appear brown at first but over time will naturally patinate and turn green as the existing copper cladding has done. The proposed batten seams to the copper will also match the existing profiles. Whilst there will initially be a change in colour to the dome, the patination process is part of the natural properties of copper and over time the dome will turn green to match the existing patination which is over 100 years. As the proposed material will match the existing, the replacement of the copper dome cladding is considered to have a neutral impact on the listed building.
- **Access:** not affected by the current proposals.

JUSTIFICATION STATEMENT

Planning (Listed Buildings and Conservation Areas) Act 1990

43. **Section 66** states that in the determination of planning applications which affect a listed building or its setting, *'the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'*

    Response: This report has considered the physical impact of the proposal on the listed building and has determined that overall a negligible degree of less than substantial harm will occur. This is limited to the removal of a severely corroded historic roof truss which is at risk of failing and is not in good enough condition to support the increased loading of the installation of a member's bar within the dome area. Different options for the permanent works have been considered and assessed by structural engineers Heyne Tillett Steel (HTS), including the enhancement and retention of the existing historic truss. However, this is not possible due to the current poor condition of the existing truss and extremely difficult in situ working conditions. The harm will be limited to an isolated area and will not be visible from both inside and outside of the listed building. Replacement of the historic truss is unavoidable due to structural and health and safety reasons, and will enable the implementation of the extant consent (2018/4035/P and 2018/4037/L) and ensure the long-term preservation of the listed building.

    The proposed installation of the PFCs will also result in a negligible degree of less than substantial harm. This harm is limited to the areas of decorative fibrous plasterwork that will be disrupted on the ceiling beams at First floor level. The PFCs will meet the ceiling beam in the location where the existing plasterwork is situated. The proposals include the careful removal and reinstatement of the existing plasterwork slightly further along the beam to enable the installation of the PFC. This work will be undertaken by a suitably qualified conservation plaster specialist. If the existing decorative plaster cannot be carefully removed and reused, then it will be replicated to match the existing design. As such, whilst the proposals will result in the relocation of the existing decorative plasterwork in this location, and possible loss if it cannot be retained, the plasterwork will be reinstated/replicated close to its current position and the visual impact will therefore be negligible.

    The proposed works to the copper dome will result in no harm to the significance of the listed building. Whilst the replacement of the copper cladding will result in a visual change to the dome, the material will match the existing and over time the new copper will patinate and turn green as per the existing condition. The proposed batten seams to the copper will also match the existing profiles. The overall impact on the listed building will thus be neutral.

NPPF Considerations:

44. The National Planning Policy Framework (February 2019) sets out the Government's planning policies for England and outlines how these should be applied. This section discusses the impact of the proposals according to the NPPF. The NPPF contains a presumption in favour of sustainable development sympathetic to the conservation of

designated heritage assets. This statement deals principally with Section 16 of the NPPF, "Conserving and enhancing the historic environment," however heritage considerations and issues are prevalent throughout the framework.

45. **NPPF Paragraph 189** states: *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."*

    Response: As recommended by NPPF, an assessment of the significance of the heritage asset has been provided and can be found in Chapter 4: Assessment of Significance in the Heritage Statement of the extant consent (2017/6058/P and 2017/6070/L). It is believed that the assessment is proportionate to the importance of the assets being considered. The assessments and analysis that have been carried out are also believed to be sufficient to understand the potential impact of the proposal on the significance of the theatre.

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

    Response: An impact assessment on the proposed changes to the listed building has been undertaken as part of the overall assessment of the proposals for this application. Impacts on the historic fabric are limited to: the removal of a single historic roof truss which supports the dome of the theatre and its replacement with a fabricated steel replica; the installation of PFCs at First, Second and Third floor resulting in the loss/relocation of some decorative fibrous plaster; and installation of new insulation to the dome bar and replacement of the copper roofing.

    The proposed works are necessary and unavoidable to enable the implementation of the consented dome bar. The existing historic truss survives in an extremely poor condition and is not sufficient to support the increased load of the consented member's bar. Furthermore, it's severely corroded condition means that the existing truss is at risk of failing at any time and this could lead to damage within the listed building. As such, retention of the existing historic truss poses both a structural and health and safety risk. Removal of the historic truss and replacement with a replica will result in a negligible degree of less than substantial harm which is limited to an isolated area and is entirely unavoidable.

    In addition, the proposed new truss will enable the removal of the emergency temporary props which were installed to support the corroded historic truss. Any damage caused by the works (namely, on the ground and first floor plasterwork), will be repaired like for like, thereby preserving the special interest of the theatre.

    Similarly, the installation of the PFCs is unavoidable and necessary to safely support the additional load of the consented dome bar. The PFCs have been designed to ensure minimal

visual impact to the listed building and the loss/removal of historic decorative fibrous plasterwork is limited to a small area and will be reinstated/replicated to minimise visual impact. The installation of the PFCs will thus result in a negligible degree of less than substantial harm.

The replacement of the copper roof with like-for-like materials and the installation of new insulation and ventilation will have no adverse impact on the listed building. Whilst the replacement of the copper cladding will result in a visual change to the dome, the material will match the existing and over time the new copper will patinate and turn green as per the existing condition. The proposed batten seams to the copper will also match the existing profiles. The overall impact on the listed building will thus be neutral.

Importantly, the overall special architectural and historic interest of the listed building will remain fully appreciable.

47. **NPPF Paragraph 192** states: *"In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness."*

    Response: The proposal has been driven by the need to ensure the listed building's safety and structural stability and to improve the acoustic and thermal properties of the existing dome, to enable implementation of the consented member's bar in the dome area (2018/4035/P and 2018/4037/L). If retained in its current state, the historic truss which supports the dome is at risk of collapse. Once the proposed new permanent truss has been installed, the current temporary props will be carefully removed and any impact on the historic fabric will be remediated by like for like repair. The installation of the PFCs is essential and unavoidable to support the additional load of the dome bar and enable the consented use to be implemented. The PFCs have been designed to ensure minimal physical and visual impact to the listed building. Similarly, the installation of new insulation within the dome and the replacement of the copper cladding is also essential to ensure the protection of the building and the use of the space as a bar. Whilst the proposals will result in some overall negligible less than substantial harm, the historic character of the listed building will be protected and its long-term conservation ensured.

48. **NPPF Paragraph 193** states: *"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*

49. **NPPF Paragraph 194** states: *"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered*

battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*

50. **NPPF Paragraph 196** states: *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

    Response: It is considered that the proposed new permanent truss will result in a negligible degree of less than substantial harm. However, this harm is limited and isolated to the removal of the existing historic dome truss which survives in an extremely poor and corroded condition. Its replacement with a replica is unavoidable due to the to ensure building safety and allow for the consented works to be carried out. The replacement of the failing truss is the most sensitive solution in listed building terms, ensuring that the adverse impact is limited to the loss of a historic truss which survives in an extremely poor and unsafe condition. The proposed works will ensure that the installation of the member's bar will be both structurally sound and safe and removal of the historic truss will remove the risk of its potential collapse and damage to the listed building.

    Furthermore, installation of the proposed new truss will result in the removal of the temporary props from Ground to Fourth floor, thus restoring the original proportions of each room that was affected by these emergency works. Following removal of the temporary works, any removal of small sections of the plasterwork where the structural junctions occurred, will be repaired like for like.

    The proposed installation of the PFCs will also result in a negligible degree of less than substantial harm. This harm is limited to the areas of decorative fibrous plasterwork that will be disrupted on the ceiling beams at First floor level. The PFCs will meet the ceiling beam in the location where the existing plasterwork is situated. The proposals include the careful removal and reinstatement of the existing plasterwork slightly further along the beam to enable the installation of the PFC. This work will be undertaken by a suitably qualified conservation plaster specialist. If the existing decorative plaster cannot be carefully removed and reused then it will be replicated to match the existing design. As such, whilst the proposals will result in the relocation of the existing decorative plasterwork in this location, and possible loss if it cannot be retained, the plasterwork will be reinstated/replicated close to its current position and the visual impact will therefore be negligible.

    The proposed works to the copper dome will result in no harm to the significance of the listed building. Whilst the replacement of the copper cladding will result in a visual change to the dome, the material will match the existing and over time the new copper will patinate and turn green as per the existing condition. The proposed batten seams to the copper will also match the existing profiles. The overall impact on the listed building will thus be neutral.

National Planning Practice Guidance (NPPG) – March 2014; ID 18a: Conserving & enhancing the historic environment (Updated: 10 04 2014)

PPG Paragraph: 003 - Reference ID: 18a-003-20140306

51. *"What is meant by the conservation and enhancement of the historic environment?*

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

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

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

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

Response: The proposals recognise the importance of the definition of 'conservation' as the "active process of maintenance and managing change". Over the years, the site and the wider conservation area have been subject to change; and it is necessary for it to continue to change in order to maintain its character as a welcoming and amenable building. These works will enable the consented works to be carried out and ensure the long-term preservation of the listed building.

PPG Paragraph: 009 - Reference ID: 18a-009-20140306

"Why is 'significance' important in decision taking?

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

Response: Heritage assets can be adversely affected by physical change or change to their setting. It is contended the nature, extent and importance of the significance of the affected heritage assets has been properly assessed and the relevant investigations of the roof area (the truss), the copper dome and the west elevation brick piers have been carried out and different options have been explored, thereby enabling acceptable and justifiable proposals to be developed.

PPG Paragraph: 017 - Reference ID: 18a-017-20140306

"How to assess if there is substantial harm?

What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.

Policy on substantial harm to designated heritage assets is set out in paragraphs 132 and 133 to the National Planning Policy Framework."

Response: The impact on the significance of the heritage assets has been fully considered in the Impact Assessment chapter of the Heritage Statement prepared for the consented scheme (2017/6058/P and 2017/6070/L). There is no occurrence of substantial harm.

PPG Paragraph: 019 - Reference ID: 18a-019-20140306

"How can proposals avoid or minimise harm to the significance of a heritage asset?

A clear understanding of the significance of a heritage asset and its setting is necessary to develop proposals which avoid or minimise harm. Early appraisals, a conservation plan or targeted specialist investigation can help to identify constraints and opportunities arising from the asset at an early stage. Such studies can reveal alternative development options, for example more sensitive designs or different orientations, that will deliver public benefits in a more sustainable and appropriate way."

Response: The significance of the grade II listed building has been fully assessed and informed the design process. The Heritage Statement prepared for the consented scheme (2017/6058/P and 2017/6070/L) includes a historic background on the building and the area and includes a full significance assessment.

Historic England's Good Practice Advice

Planning Note 2 (2015) Para.9:

"Understanding the extent of that significance is also important because this can, among other things, lead to a better understanding of how adaptable the asset may be and therefore improve viability and the prospects for long term conservation."

Response: The significance of the grade II listed building has been fully assessed and informed the design process. The Heritage Statement prepared for the consented scheme (2017/6058/P and 2017/6070/L) includes a historic background on the building and the area and includes a full significance assessment.

Planning Note 3 (2017) Para.12:

"Amongst the Government's planning objectives for the historic environment is that conservation decisions are based on the nature, extent and level of a heritage assets significance and are investigated to a proportionate degree. Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to complex or more straightforward cases:

Step 1: identify which heritage assets and their settings are affected

Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s)

Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance [...]"

Response: The steps above have been complied with. The significance of the heritage assets affected by the proposals has been assessed, as well as the effects of the proposed development. The proposal is assessed as causing a negligible degree of less than substantial harm to the listed building, but this is deemed unavoidable and will not fundamentally impact an understanding and appreciation of the listed building's overall special architectural and historic interest, as explained above. The proposals will have no impact on the conservation area.

CONCLUSION

52. Due to the failing and severely corroded condition of the existing historic dome truss, the proposed permanent truss replacement works are deemed necessary and unavoidable to enable to implementation of the consented member's bar (2018/4035/P and 2018/4037/L) and the long-term preservation of the listed building, as well as ensuring the health and safety of the users of the building. Whilst the removal of the historic truss will result in the loss of historic fabric, this will be limited to an isolated and concealed steel truss which is severely corroded, at the end of its life and no longer structurally sound. As such, the harm to the listed building is considered to be less than substantial and negligible, and this would be outweighed by the unavoidable nature of the proposals and the risk that retaining the existing historic truss poses to potentially damaging the listed building if it fails.

53. Similarly, the installation of the proposed PFCs are essential to support the additional load of the consented dome bar. The placement, dimensions and finish of the PFCs have been designed to ensure minimal physical and visual impact to the listed building. The installation of the new columns will result in the removal of a small amount of historic fabric, most notably some decorative fibrous plasterwork on the ceiling beams at First floor level. whilst this will result in a degree of less than substantial harm, this is considered to be negligible as the decorative plaster will be reinstated/replicated on the beam close to its existing position to allow for the PFC to be installed. As such, the visual impact of the PFCs at First floor will be minimal and will not prevent an understanding of the overall significance of the listed building.

54. The replacement of the copper roof with new copper and the installation of new insulation and ventilation will have no adverse impact on the listed building. The existing copper roofing is at the end of its life and is beyond repair, thus requiring replacement. The installation of the insulation and ventilation is necessary to enable the consented use of the dome space as a bar and will have no visual or physical impact on the historic fabric or the significance of the listed building. Whilst the replacement of the copper cladding will result in a visual change to the dome, the material will match the existing and over time the new copper will patinate and turn green as per the existing condition. The proposed batten seams to the copper will also match the existing profiles. The overall impact on the listed building will thus be neutral.

55. The proposals are crucial in allowing people to enter the site in compliance with health and safety regulations and will allow for the consented works to progress safely.

56. The proposal is thus considered consistent with the spirit of local policies and national conservation principles, including NPPF policy principles guiding the determination of applications for consent relating to all heritage assets.

57. Whilst the proposed works will result in an overall negligible degree of less than substantial harm to the listed building through the loss of a historic truss, this historic fabric is damaged beyond repair and represents a structural and health and safety risk, and therefore its replacement is unavoidable and justified, as set out above. Similarly, whilst the installation of the PFCs will result in a negligible degree of less than substantial harm through the loss/movement of some historic decorative plasterwork on the ceiling beams at First floor level, this will be reinstated/replicated like-for-like on the beams in a similar position and thus the visual impact will be negligible. The PFCs are of the smallest dimensions necessary and they will be appropriately and discreetly boxed in, with the finishes matching each room including replication of features such as skirting, cornice and dado rails at First floor, thus minimising any visual impact. Overall the proposed works will not fundamentally affect the special architectural or historic interest of the building.

Stephen Levrant: Heritage Architecture
Architects and Heritage Asset Consultants

APPENDIX 1: PHOTOGRAPHS

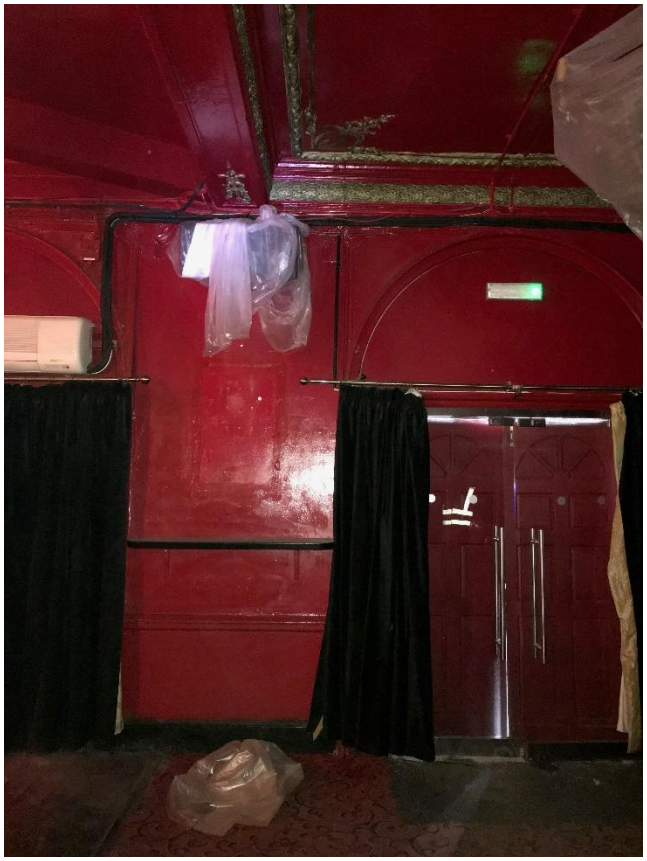

Figure 1: View of the interior of the west elevation at First floor. The proposed PFCs will be located centrally beneath the ceiling beams. The existing skirting, cornice and dado rail will be replicated on the proposed PFCs.

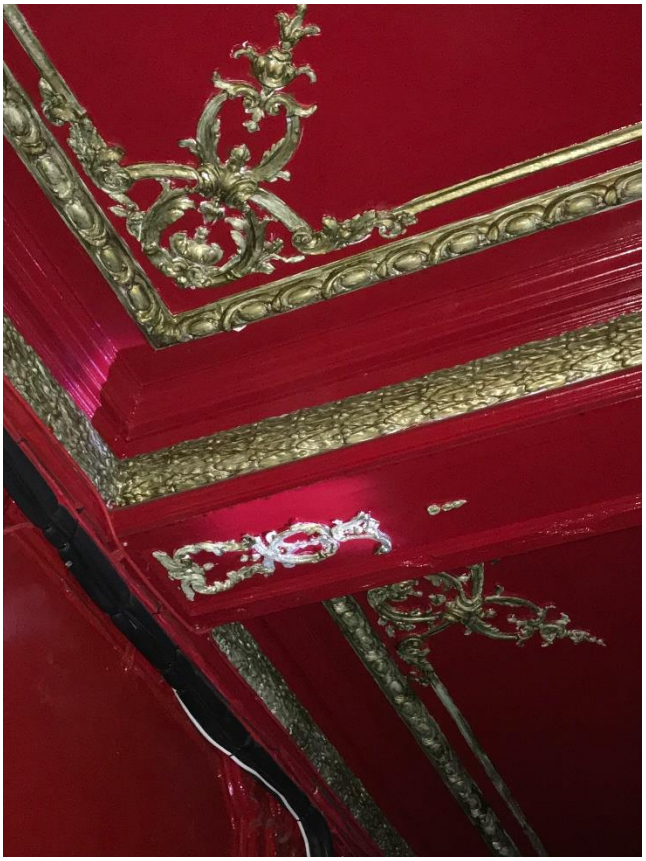

Figure 2: View of the ceiling and decorative fibrous plaster at First floor. The proposed PFCs will intersect the decorative plaster on the ceiling beam. This will be carefully removed and reinstated on the beam in close proximity to its existing position but to allow for the PFC. The works will be undertaken by an appropriate fibrous plaster conservation specialist. If the historic plaster is in poor condition and cannot be removed and reinstated, it will be replicated like-for-like in the new location.

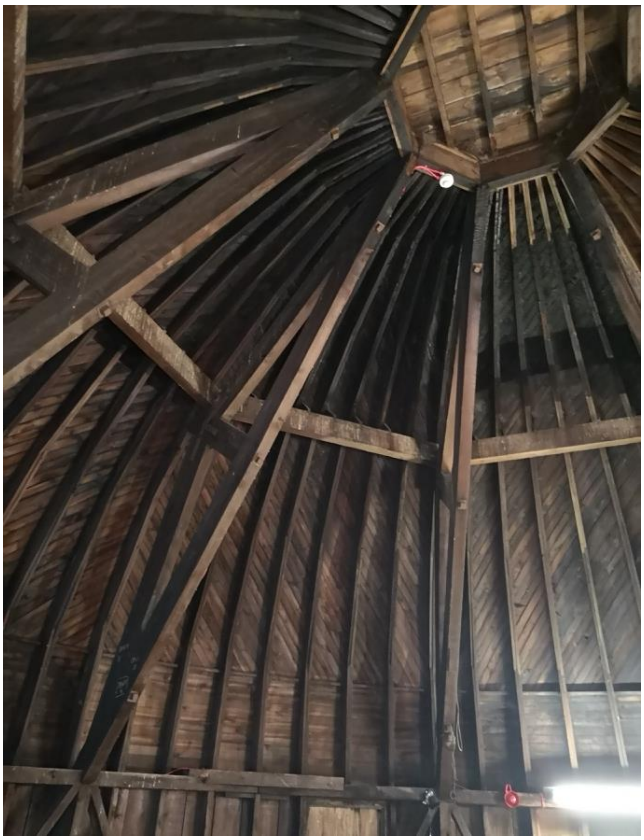

Figure 3: View of the historic timbers and sarking boards within the dome. These will be retained and will remain visible in the dome bar, as per the original consent. The proposed insulation and ventilation void will be introduced on the other side and covered by the new copper roofing which will match the existing copper which is at the end of its life.