## Donald Insall Associates

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Our ref: SHK

Ms. Laura Hazelton, Senior Planning Officer London Borough of Camden 5 Pancras Square London N1C 4AG

2019/2790/L and 2019/2773/P, Space House, 1 Kemble Street and 43-59 Kingsway

12 August 2019

Dear Laura,

We would appreciate the opportunity to respond to the recent consultation comments put forward by the Twentieth Century Society regarding the proposed scheme at Space House, 1 Kemble Street and 43-49 Kingsway WC2B 6TE, currently under determination by the London Borough of Camden. Space House is a Grade II-listed building erected in 1964-8 which sits adjacent to the Kingsway Conservation Area. The scheme as currently proposed reflects an extensive and collaborative consultation process with conservation, planning and design officers at the London Borough of Camden, as well as advice regarding exterior aspects of the design provided by Historic England.

Objections have been raised to two principal elements of the proposed scheme: the size of the proposed rooftop extension to the cylindrical tower block at 1 Kemble Street and the glazed enclosures proposed at the ground floor level of the tower and Kingsway blocks. In regard to the former, the concerns raised are related to how the recessed, uppermost part of the proposed tower extension would impact the uniformity of Marsh's original concrete façade and cornice. The potential for this impact was very carefully considered throughout the design process, resulting in the facsimile approach to the lower floors of the tower extension currently put forward, which continues the Modernist symmetry of the original design.

The set-back portion of the proposed extension was also discussed at length with conservation and design officers, and designed to conceal views of rooftop plant – an aspect which presently detracts from a number of street views of the façade within a number of conservation areas. In these cases both the existing and proposed roofline were carefully assessed following officers' advice. It is considered that the resulting proposed extension to the tower would enhance the character and appearance of the overall architectural composition, and if any perceived harm would be caused to the special interest of the listed building, this would be less than substantial and balanced by the additional heritage and public benefits of the wider scheme. As part of the determination period, architects Squire and Partners are currently reviewing the detailed design of the proposals in light of consultation responses received on the applications in liaison with Camden planning and design officers.

The Society has also raised concerns about the proposed glazed enclosures at the ground floor level of both the tower and Kingsway blocks, whilst making it clear that the former alterations which exist at present in these areas detract from the special interest of the listed building. The current proposals deliberately seek to improve these detracting elements through a thoughtful yet practical design, which will ensure the long-term, original use of the building as offices whilst not causing substantial harm to its special interest. Below the Kingsway block, this includes greatly improving the existing enclosure of the south staircase through the introduction of light-touch, streamlined glazing to allow for the building's sculptural pilotis to be read in composition with the staircase and original mosaic finishes. The proposed design also has created useable space below the west side of the tower block, which was originally intended for use as underground car park access and a filling station. As modern office commuting needs have evolved over the past decades, it is prudent for these areas to be sensitively adapted for a new chapter in their re-use, whilst maintaining the

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architectural integrity of the original design. The latter has been sensitively addressed by setting back the proposed glazing behind the tower's pilotis and within the line of the projecting canopy to allow for the continued legibility of original sculptural features.

To conclude, the proposed scheme for Space House now under consideration is the result of a sensitive and carefully thought-out design process which is considered to preserve the special architectural and historic interest of the Grade II-listed building. The wider proposed scheme offers substantial public benefits which would outweigh any perceived 'less than substantial harm', therefore meeting the tests within the NPPF for sustainable development insofar as these relate to the historic environment. These include the enhancement of the surrounding townscape and public realm, reactivation of public uses at ground floor level and street frontages, improvements to the building's energy efficiency and sustainability in the long-term and an enhanced, high-quality design which would contribute to the local streetscape and conservation area. The building's optimum viable use as a commercial complex – a key part of its significance as outlined by the building's listing description – would be maintained, and the proposed scheme would also accord with the relevant policies of the NPPF, and with the London Borough of Camden's local policies regarding the historic environment. This is why we consider the proposals to be acceptable in heritage terms.

Yours sincerely,

Megan Hari

Historic Buildings Advisor Historic Buildings Consultancy Team For and on behalf of Donald Insall Associates