
Planning Statement

Kodak House





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1. Introduction

This Planning Statement has been prepared, on behalf of Kings Keeley Limited in support of an application for Planning Permission and Listed Building Consent (LBC) to Camden Council ('The Council') in respect of Kodak House, 65 Kingsway Holborn, London, WC2B 6TD. A Planning Performance Agreement (PPA) has been entered with Camden Council on 2 August 2019.

Planning permission is sought from Camden Council for the *"the comprehensive repair, refurbishment and restoration from basement to roof level, including internal and external alterations to the building"*.



Figure 1: Kodak House (Source: Google Maps, 2019)

In this Planning Statement we describe the site, set out the planning history, provide planning context, define and assess the application proposals by taking into account the significance of the statutorily listed building in order to demonstrate the inclusive and integrated approach that has been adopted in formulation of the development that responds to the relevant Planning Policy Framework. The Statement is structured under the following headings:

- Section 2 – Application Context
- Section 3 – Site Description and Context
- Section 4 – Pre-Application Consultation
- Section 5 – Planning Context
- Section 6 – Planning Assessment
- Section 7 – Planning Conditions and Obligations
- Section 8 – Conclusions

In the next section, we describe the application proposal.

2. Application Context

This section describes the application proposal and content. Further consideration is given to the key issues in the Planning Assessment section.

2.1. Application Proposal

Planning Permission and LBC is sought from Camden Council for *“the comprehensive repair, refurbishment and restoration from basement to roof level, including internal and external alterations to the building”*. In summary, this includes the following:

Façades

- Replace all windows
- Cleaning and restoration of existing façades
- 6th and 7th floors part re-built and re-clad with materials in keeping with the historic bronze

New ‘Kodak House’ Entrance:

- New entrance off Keeley Street, new doors, canopy, lighting & Signage and slab level alterations to allow grade access

Historic Kingsway Entrance

- Retention and refurbishment of historic entrance in keeping with the existing hierarchy of the façades

Reception

- Provide an enlarged reception that is accessed off both Keeley Street and Kingsway
- New finishes, lighting, reception desk, seating area and client suite
- Retain and refurbish historic features where present
- Lower slab and create internal stepped access between levels
- Removal of 3.no. Columns to facilitate reception space plus 2no columns will be removed to allow for the core construction

CAT A Office Refurbishment

- Refurbishment of all office floors, common parts, WC’s and lifts to achieve occupancy 1:8 per floor
- Allow for subdivision of floor plates to allow 2 tenant split

Columns

- From 1st to the 7th floor, one column will be removed within the new open plan office floor plate, and two columns removed adjacent to the new core construction, resulting in the removal of three per floor
- From the proposed Keeley Street reception at ground floor it is proposed that three columns are removed, as well as two adjacent to the northern core, resulting in five in total
- From the basement level, two columns will be removed to allow the new core construction, and one column removed to allow the new facilities layout, resulting in three in total

Core

- New primary core anchored to Wild Court elevation, includes removal of columns in the localised area to engineer the new core
- Retain historic staircase and connect to new core
- New lift shaft serving all levels
- Secondary escape stair repositioned to facilitate new layout
- Plant and risers relocated to suit

Occupier facilities

- New bicycle parking at BF
- New shower, WC's, locker, drying room and changing facilities at BF to BCO guidelines
- Some plant relocated to roof level

Terraces

- Communal terrace at roof level
- Provide consolidated plant area enclosed at roof level

2.2. Application Content

This application for LBC and Planning Permission is accompanied by the following information:

- Completed Application Form for Planning Permission and Listed Building Consent (Savills)
- Cover Letter (Savills)
- Planning Statement (Savills)
- Design and Access Statement (Barr Gazetas)
- Heritage Statement (Bidwells)
- Noise Impact Assessment (Hann Tucker Associates)
- Planning Report for Base Scheme (Heyne Tillett Steel)
- Drawings (Barr Gazetas), as follows

Drawing No.	Title	Scale and Size
1914-BG-01-ZZ-DR-A-00.100 Rev. P4	Site Location Plan	1:1250 @ A1 1:2500 @ A3
1914-BG-01-ZZ-DR-A-10.101 Rev. P4	Existing Site Plan	1:500 @ A1 1:1000 @ A3
1914-BG-01-00-DR-A-10.202 Rev. P4	Existing Ground Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-01-DR-A-10.203 Rev. P4	Existing First Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-02-DR-A-10.204 Rev. P4	Existing Second Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-03-DR-A-10.205 Rev. P4	Existing Third Floor Plan	1:100 @ A1 1:200 @ A3

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1914-BG-01-04-DR-A-10.206 Rev. P4	Existing Fourth Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-05-DR-A-10.207 Rev. P4	Existing Fifth Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-06-DR-A-10.208 Rev. P4	Existing Sixth Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-07-DR-A-10.209 Rev. P4	Existing Seventh Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-08-DR-A-10.210 Rev. P4	Existing Roof Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-B1-DR-A-10.201 Rev. P4	Existing Basement Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-10.252 Rev. P4	Existing Section BB	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-10.255 Rev. P4	Existing Section EE	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-10.271 Rev. P4	Existing Keeley Street Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-10.272 Rev. P4	Existing Kingsway Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-10.273 Rev. P4	Existing Wild Court Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-10.274 Rev. P4	Existing West Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-10.281 Rev. P4	Existing Keeley St. Site Context Elevation	1:200 @ A1 1:400 @ A3
1914-BG-01-ZZ-DR-A-10.282 Rev. P4	Existing Kingsway Site Context Elevation	1:200 @ A1 1:400 @ A3
1914-BG-01-ZZ-DR-A-10.283 Rev. P4	Existing Wild Court Site Context Elevation	1:200 @ A1 1:400 @ A3
1914-BG-01-ZZ-DR-A-20.200 Rev. P4	Proposed Site Plan	1:500 @ A1 1:1000 @ A3
1914-BG-01-B1-DR-A-20.201 Rev. P4	Proposed Basement Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-00-DR-A-20.202 Rev. P4	Proposed Ground Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-01-DR-A-20.203 Rev. P4	Proposed First Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-02-DR-A-20.204 Rev. P4	Proposed Second Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-03-DR-A-20.205 Rev. P4	Proposed Third Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-04-DR-A-20.206 Rev. P4	Proposed Fourth Floor Plan	1:100 @ A1 1:200 @ A3

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1914-BG-01-05-DR-A-20.207 Rev. P4	Proposed Fifth Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-06-DR-A-20.208 Rev. P4	Proposed Sixth Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-07-DR-A-20.209 Rev. P4	Proposed Seventh Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-08-DR-A-20.210 Rev. P4	Proposed roof plan	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.252 Rev. P4	Proposed Section BB	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.255 Rev. P4	Proposed Section EE	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.271 Rev. P4	Proposed Keeley Street Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.272 Rev. P4	Proposed Kingsway Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.273 Rev. P4	Proposed Wild Court Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.274 Rev. P4	Proposed West Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.281 Rev. P4	Proposed Keeley St. Site Context Elevation	1:200 @ A1 1:400 @ A3
1914-BG-01-ZZ-DR-A-20.282 Rev. P4	Proposed Kingsway Site Context Elevation	1:200 @ A1 1:400 @ A3
1914-BG-01-ZZ-DR-A-20.283 Rev. P4	Proposed Wild Court Site Context Elevation	1:200 @ A1 1:400 @ A3
1914-BG-01-00-DR-A-34.601 Rev. P4	Keeley Street Entrance Detail	1:20 @ A1 1:40 @ A3
1914-BG-01-00-DR-A-34.602 Rev. P4	Kingsway Entrance Detail	1:20 @ A1 1:40 @ A3
1914-BG-01-ZZ-DR-A-10.370 Rev. P4	Existing Historic Ceiling Detail	1:50 @ A1 1:100 @ A3
1914-BG-01-ZZ-DR-A-15.370 Rev. P4	Historic Ceiling Demolition Detail	1:50 @ A1 1:100 @ A3
1914-BG-01-ZZ-DR-A-20.301 Rev. P4	Typical Core details	1:30 @ A1 1:60 @ A3
1914-BG-01-ZZ-DR-A-33.601 Rev. P4	Typical Replacement Window Details	1:10 @ A1 1:20 @ A3
1914-BG-01-ZZ-DR-A-35.270 Rev. P4	Proposed Historic Ceiling Detail - Ground Floor	1:50 @ A1 1:100 @ A3
1914-BG-01-ZZ-DR-A-35.271 Rev. P4	Proposed Historic Ceiling Detail First Floor	1:50 @ A1 1:100 @ A3
1914-BG-01-B1-DR-A-15.201 Rev. P4	Demolition Basement Plan	1:100 @ A1 1:200 @ A3

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1914-BG-01-00-DR-A-15.202 Rev. P4	Demolition Ground Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-01-DR-A-15.203 Rev. P4	Demolition First Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-02-DR-A-15.204 Rev. P4	Demolition Second Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-03-DR-A-15.205 Rev. P4	Demolition Third Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-04-DR-A-15.206 Rev. P4	Demolition Fourth Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-05-DR-A-15.207 Rev. P4	Demolition Fifth Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-06-DR-A-15.208 Rev. P4	Demolition Sixth Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-07-DR-A-15.209 Rev. P4	Demolition Seventh Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-08-DR-A-15.210 Rev. P4	Demolition Roof Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-15.252 Rev. P4	Demolition Section BB	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-15.255 Rev. P4	Demolition Section EE	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-15.271 Rev. P4	Demolition Keeley Street Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-15.272 Rev. P4	Demolition Kingsway Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-15.273 Rev. P4	Demolition Wild Court Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-15.274 Rev. P4	Demolition West Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-15.281 Rev. P4	Demolition Keeley St. Site Context Elevation	1:200 @ A1 1:400 @ A3
1914-BG-01-ZZ-DR-A-15.282 Rev. P4	Demolition Kingsway Site Context Elevation	1:200 @ A1 1:400 @ A3
1914-BG-01-ZZ-DR-A-15.283 Rev. P4	Demolition Wild Court Site Context Elevation	1:200 @ A1 1:400 @ A3

In the next section, we provide a description of the site and surrounding area before describing the pre-application consultation that has been undertaken.

3. Site Description And Context

The application site ('the Site') is located within the London Borough of Camden. Kodak House comprises a 7-storey office (Class B1) and mixed-use building with a basement and attic storey, located on the western side of Kingsway, between Wild Court and Keeley Street. For completeness, the proposals do not relate to part of the basement currently used as a gym and the retail units on ground floor level fronting Kingsway. The building is statutorily listed, with Grade II status, having been added to the Statutory List for Building of Architectural or Historic Interest on 8 September 1971.

The building lies within the Kingsway Conservation Area; and the site also forms part of the Holborn 'Central London Frontage' zoning, designated as a protected secondary frontage. There are two existing retail units located at ground floor of the office block, currently occupied by tenants, Soho Coffee Co and Eton (a clothing store).



Figure 2: Aerial view of site, outlined in red (Google Maps, 2019)

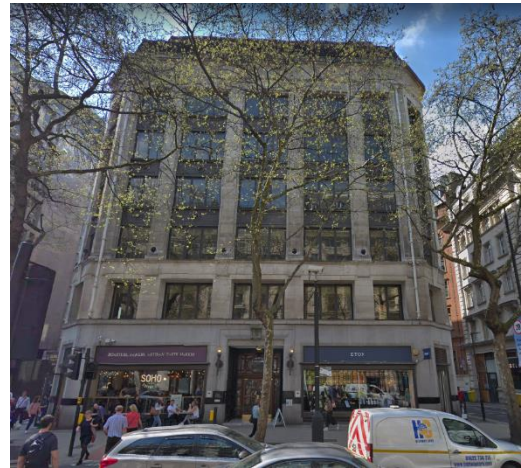


Figure 3: View of site (Google Maps, 2019)

The building is a purpose-built office block, originally designed and built for the iconic American company Kodak (properly, The Eastman Kodak Company - referred to simply as Kodak), one of the world's first global technology companies, producing camera-related products and with its historic basis on photography, founded by George Eastman and Henry A. Strong on September 4, 1888. During most of the 20th Century, Kodak held a dominant position in photographic film. Construction of Kodak House commenced in 1911 - the building originally comprised six storeys (including basement). A single storey extension was added at level 6 in 1925. A further extension was added at level 7, in 1986. The main doorway to the building is formed of a stone bolection moulded door surround and flanked by bronze torches, with decorative bronze detailing to the roof.

There are a number of listed buildings located close to and within the setting of Kodak House, including the Grade II status Civil Aviation Authority House 'Space House' and the Grade II* listed Grand Connaught Rooms. The majority of buildings in Kingsway were constructed between 1900 and 1922 - the buildings generally consisting of offices at upper levels and shops at ground floors. No.65 forms part of the designated Holborn Central London Frontage, protected as a 'secondary frontage'. Recent permissions granted to 'Space House' as designed by Michael Squires will see the Listed Building re-glazed and internally/externally refurbished, adding over 1000sqm of new floorspace. This is located across the road to the site transforming the aesthetic of the area which would work well alongside the refurbishment of Kodak House to further enhance the townscape.



Figure 4: View of site (Google Maps, 2019)



Figure 5: View of site (Google Maps, 2019)

The application site is highly sustainable and well served by public transport and has a PTAL rating of 6b, defined as 'Excellent'. The site is within walking distance of Holborn Station and other key well connected stations as shown in Figure 6. The location of the site is also served by a number of bus stops such as Holborn station (Stop N).



Figure 6: PTAL Map showing the site's excellent PTAL rating (TfL, WebCAT)

4. Pre-Application Consultation

In this section of the report, we summarise the pre-application consultation that has been undertaken with regard to the site.

A formal request for pre-application advice was submitted to Camden Council on 2 August 2019, and a meeting was held with Officers on site on 9 September 2019. Subsequently four additional pre-application meetings were held on, 9 September, 23 September, 4 October and 30 October 2019. In summary, Officers have verbally stated that the refurbishment works proposed are considered to be acceptable 'in principle'.

Throughout the pre-application process, the scheme proposals have been constantly evolving, developing and refined, to respond to comments raised by officer during site visits and meetings. The meetings were positive and support was received from Officers in respect of the secondary entrance on Keeley Street which would rejuvenate the space.

The repairs and window replacement to the listed building was supported by the Conservation Officer and the improvements were considered to enhance and improve the appearance of the Grade II listed building. In addition, Officers considered that the layout reconfiguration could be supported if it improved the rationalisation of the office floor space.

The potential for a roof extension was also discussed during these pre-application meetings where Officers expressed concerns in respect of the height, bulk and massing of the proposed extension. Officer's agreed that the preferred roof material would be to match the existing bronze roof finish and further meetings were held to review design options for the roof extension. It was agreed with Officers that two applications will be submitted to the Council, separating the refurbishment works to the building and the roof extension in two individual applications.

In the next section, we review the planning context for the application site.

5. Planning Context

5.1. Planning History

We have reviewed the planning history for the site and there is an extensive site history for the property and the most relevant applications are set out in the table below. Importantly, the building was subject to the creation of an additional floor at 6th floor level in 1986, and has since undergone a number of refurbishments and occupier fit out installations both to the Office space, retail units and associated facilities.

Reference No.	Description	Decision
2019/1897/L	Replace 4 no. existing columns with new structural frame	Granted 29 May 2019
2018/3024/L	Refurbishment of basement space for gym with installation of mezzanine and services and removal of infill masonry	Granted 3 September 2018
2017/2090/L	External and internal alterations to the shop, including 2 externally illuminated projecting signs and internal advertising vinyls	Granted 26 May 2017
2016/6969/L	Various internal alterations to 4th floor offices	Granted 2 February 2017
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 21 December 2017
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 21 December 2015
2015/2748/L	Internal refurbishment of existing offices at basement, ground, first and second floors	Granted 15 July 2017
2011/5860/P	Installation of louvre grille to the fanlight of front entrance doors at ground floor level Wild Court, retail unit (Class A1).	Granted 6 February 2012
2011/5855/L	Works in association with the installation of louvre grille to the fanlight of front entrance doors at ground floor level Wild Court, retail unit (Class A1).	Granted 6 February 2012
2010/4844/P	Retention of 3 x air-conditioning condenser units, and associated pipe work, to roof of office building (Class B1)	Granted 14 December 2010
2010/0797/L	Installation of 3 x air conditioning condenser units to existing roof, including additional service runs within the 6th and 7th floor levels	Granted 3 August 2010
2010/0795/P	Installation of 3 x air conditioning condenser units to roof of office building (Class B1)	Refused 3 August 2010
PS9704664	Removal of bronze anodised aluminium windows, infilling of old window apertures with yellow stock bricks and rendered masonry to match existing surrounds	Granted 11 September 1997
8600977	The erection of an additional floor at 7th floor level and its use for offices	Granted 14 August 1986
8600847	Conversion of a loading bay into office accommodation and the re siting of an existing shop unit	Granted 30 July 1986

5.2. Planning Policy

Planning law requires that where regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise¹. In assessing and determining development proposals, the National Planning Policy Framework 2019 (NPPF) states that local planning authorities should apply presumption in favour of sustainable development.

5.3. National Planning Policy Framework 2019

Paragraph 8 sets out the three overarching objectives for achieving sustainable development in the planning system, these include:

- Economic objective – to help build a strong, responsive and competitive economy
- Social objective – to support strong vibrant and healthy communities
- Environmental objective – to contribute to protecting and enhancing our natural, built and historic environment

Paragraph 38 advises that Local planning authorities should approach decisions on proposed development in a positive and creative way.

Paragraph 124 highlights the need for high quality building and places and notes that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 128 confirms that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected.

Paragraph 81 (c) states that planning policies should be flexible enough to accommodate need not anticipated in the plan, including rapid response to changes in economic circumstances.

Paragraph 85 outlines that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

Paragraph 118 states that planning policies and decisions should (c) give weight to the value of using suitable brownfield land within settlements for homes and other identified needs and, (d) promotes and supports development of under-utilised land and buildings.

Paragraph 127 outlines criteria for Planning policies and decisions, ensuring that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

¹ Section 38(6) of the Planning and Compulsory Purchase Act (2004) and Section 70(2) of the Town and Country Planning Act (1990)

- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and 39
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Paragraph 131 gives great weight to outstanding and innovative designs which promote high levels of sustainability, or help raise standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

5.4. The Development Plan

The development plan comprises The Camden Local Plan (2017), Site Allocations Plan (2013). Camden's Local Plan places an emphasis on securing high quality design which respects the local context and character and preserves or enhances the heritage assets. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings. These are specifically addressed in policies D1 'Design' and D2 'Heritage' in The Camden Local Plan, and within the Camden Planning Guidance on Design (2019) and Amenity (2018). In addition, Kingsway Conservation Area Statement (2001) provides an analysis of the character and appearance of Kingsway Conservation Area.

Overall, there is strong national and local planning support for the protection of designated heritage assets and the restoration and enhancement to ensure there is no detrimental harm to special architectural or historic interest of listed buildings or the character and appearance of conservation areas. The applications scheme proposal has been developed in this context.

5.5. The London Plan

Regional planning policy for London is contained within the July 2016 London Plan which sets out planning policy for the capital until 2031, integrating social, economic and environmental policy. The underlying objective is to accommodate London's population and economic growth through sustainable development.

The Draft New London Plan includes some key policies relevant to this application as set out below:

- Policy 7.4 states that developments should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings.

- Policy 7.8 states that London's heritage assets and historic environment should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

5.6. Camden Local Plan (2017)

5.6.1. Growth and spatial strategy

- Policy G1 Delivery and location of growth states the council wishes to secure and promote conditions for growth through jobs, infrastructure and facilities in order to meet the needs and harness the benefits for those who live and work in the borough. The delivery of growth includes high quality development and promoting the most efficient use of land and buildings in Camden by:
 - a) supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;
 - b) resisting development that makes inefficient use of Camden's limited land;
 - c) expecting the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible; and
 - d) supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.

5.6.2. Economy and Jobs

- Policy E1 Economic development explains that the council seeks to secure a successful and inclusive economy in Camden by creating the condition for economic growth and harnessing the benefits for local residents and businesses.
- Policy E2 Employment premises and sites seeks to encourage the provision of employment premises and sites in the borough. In addition to protecting the premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy.

5.6.3. Protecting amenity

- Policy A1 Managing the impact of development refers the importance of quality of life for occupiers and neighbours and will grant permission for development unless they cause unacceptable harm to amenity.

5.6.4. Design and Heritage

- Policy D1 Design seeks to secure high quality design in development that; respects local context and character, preserves and enhances the historic environment and heritage assets.
- Policy D2 Heritage, seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

5.6.5. Transport

- Policy T1 seeks to prioritise walking, cycling and public transport aims to promote sustainable transport in the borough. Is satisfied through this proposal with the provision of new bicycle parking at basement level alongside new shower, WC's, lockers and changing facilities. The policy states the Council will seek to ensure that development provides high quality facilities that promote cycle usage including changing rooms, showers, and lockers.

The next section assess the application proposals against the planning context and demonstrates how the scheme proposal is compliant with relevant planning policies.

6. Planning Assessment

This section of the Statement provides our assessment of the development proposals, considering the relevant planning context and national and local planning policies.

6.1. Principle of Development

The proposal does not seek to change the use of any land or buildings. The lawful use of the building is for Use Class B1 purposes, with A1/A3 retail and café uses on ground floor level, fronting Kingsway. The proposal does not seek to change the use of any land or building and will retain the Class B1 Use of the building, including the two retail units at ground floor level. The emerging proposals principally comprise refurbishment works to enable the building to continue as modern office space.

6.2. Heritage and Design

Camden's policies on heritage and design (Policies D1 and D2) seek to secure high quality design in development that respects local context and character and enhances heritage assets. The design approach to the building has been careful and sensitively designed. The Design and Access Statement prepared by Barr Gazetas provides further detail on the scheme proposals. In addition to this, a Heritage Statement (HS), has been prepared by Bidwells to support this application for LBC and Planning Permission

The design has been developed taking account of pre-application discussions and comments from Camden Council. The Council have been supportive of the design approach for the base scheme application proposals. The scheme proposals have been revised and refined to respond positively to feedback. The HS confirms the designated assets of relevance to the determination of this application are the building itself, which is a Grade II Listed Building, and the Kingsway Conservation Area within which the building is located. The HS identifies that the significance of the building primarily relates to the construction of the building using steel framing, the open plan quality of the interior and decorative details to the main entrance which are characteristically Edwardian in design.

Kodak House has undergone numerous alterations over time, the scheme proposals seek to enhance the heritage asset and have been sensitively designed taking into account the merits of the existing building. The subsequent restorative, cleaning and repair works to the historic features will be completed to a high standard which will enhance this heritage asset. The replacement windows to the building will enhance the appearance of the front elevation and will be beneficial in heritage terms. The secondary entrance fronting Keeley Street is considered to be a significant improvement to this façade of the building which, seeks to create a greater street presence through careful design (see Figure 7 below). The design rationale of the building facades is explained in more detail in section 5 of the Design and Access Statement.



Keeley Street elevation

Figure 7: Proposed Keeley Street Elevation (Source: Design and Access Statement, Barr Gazetas, 2019)

The column removal seeks to reinstate and enhance the open plan floor space supported by the buildings steel structures. The removal of the columns are minimal in nature and over twenty columns will be retained on each floor. The later cladding to the columns will be stripped back to reveal the original historic fabric of the columns which are considered to be beneficial in heritage terms. The HS recognises that the loss of part of the original fabric of the building will result in some harm but, this is considered to be negligible in comparison to the benefits being proposed by the scheme proposals.

The HS confirms that the proposals have been sensitively developed to respect the character and appearance of the Conservation Area and have taken opportunities to enhance it where possible. It is acknowledged that there will be some loss of early 20th century historic fabric but, it is balanced with the opportunity to enhance the appearance of the of Kodak House. The assessment concludes that the proposals will have an overall neutral impact, upon the conservation area and listed building.

The proposed works protect and enhance the special architectural and historic interest of the building and the character of Kingsway Conservation Area. Overall the proposal is therefore considered to comply with policies D1 and D2 of the Council's local plan.

6.3. Noise Impact

A Noise Impact Assessment has been prepared by Hann Tucker Associates to assess the noise emissions from the proposed plant. Plant noise emission criteria have been recommended based on the results of the noise survey and with reference to the local Authority's requirements to minimise the possibility of noise nuisance to neighbours. The calculations found in the report demonstrate that the proposed plant, in conjunction with the proposed mitigation measures are capable of achieving the requirements of the Local Authority. This is considered to be in accordance with Policy A4.

6.4. Sustainability

The development is being subjected to a BREEAM assessment under the 2014 Non-Domestic Refurbishment & Fit-Out Full Assessment. This is set out in Section 10.1 of the Design and Access Statement. The assessment shows that a 'Very Good' rating is achievable and a route to achieve 'Excellent' has been identified. The development target is to achieve a BREEAM rating of Excellent. In addition, the scheme proposals are also targeting a Gold accreditation.

6.5. Summary

Overall, the planning assessment above demonstrates that the scheme proposals is of high quality design which seeks to improve and enhance the character and appearance of the existing building and the immediate townscape. The scheme is considered to be compliant with Policies D1, D2, E1 and E2.

7. Planning Conditions and Obligations

7.1. Planning Conditions

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 (NPPF paragraph 55-56).

PPG notes (paragraph 007, ID 21a-007-20140306) that it is important the local planning authority limits the use of conditions that require their approval of further matters after the permission has been granted unless they are specifically justified. Such conditions should be discussed with the applicant before permission is granted to ensure that unreasonable burdens are not being imposed and that these conditions ensure that the timing of submission meets the planned sequence of developing the site.

7.2. Obligations

The scheme proposals do not create an additional 100m² of new floor space, therefore CIL is not applicable in this instance.

In the next section we set out the conclusion.

8. Conclusions

This Statement has been prepared in support of the development proposals at Kodak House. The application will support the continued use of the building and provide high quality design which enhances the presence of this heritage asset within the context of its immediate environment and the wider area.

The scheme has been sensitively designed in order to comprehensively refurbish a renowned Grade II listed building, and enhance the special architectural character and historic interest of the building. The proposals will improve the character and appearance of the Conservation Area, through the replacement windows, additional secondary entrance, façade cleaning and refurbishment works to the main entrance.

Overall, the scheme complies with national and local planning policy, taking into account the assessment in within this document and all other relevant planning matters, we consider the application takes into account the special architectural and historic interest of this Grade II listed building.

Therefore, for the reasons set out in this Statement, we respectfully ask Camden City Council to consider the application favourably and grant Listed Building Consent and Planning permission for the scheme.



Figure 8: Proposed Kingsway Elevation (Source: Barr Gazetas)

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