



Ms Elaine Quigley  
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Development Management  
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Direct Dial: 020 7973 3091

Our ref: L01159217

24 January 2020

Dear Ms Quigley

### **Arrangements for Handling Heritage Applications Direction 2015**

**KODAK HOUSE 65 KINGSWAY LONDON WC2B 6TD**  
**Application No. 2019/6270/L**

Thank you for your letter of 6 January 2020 regarding the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

#### **Historic England Advice**

Kodak House was constructed in 1911 as the European Headquarters of the Kodak Company, to the designs of Sir John Burnet and Thomas Tait. It is of particular architectural interest owing to its somewhat radical façade treatment which is without the classical ornamentation typical of the period, and follows the typical Chicago School formula in which the aesthetic is primarily derived from the steel frame construction, as developed by Louis Sullivan. It is one of the earliest buildings London to adopt this rational approach and the composition of the principal elevation follows the tripartite or classical column subdivision as seen at Sullivan's influential Wainwright Building. Kodak House was championed in the architectural press in the 1920s and Pevsner later identified the building as one of a handful of examples of British proto-modernist buildings constructed between 1901 and 1912 in his 1942 article 'Nine Swallows, No Summer', in the *Architectural Review*.

The proposals include recladding and rebuilding of existing roof extensions, the introduction of a roof terrace and plant enclosure, the creation of new level access from Keeley Street and the replacement of all windows above ground level. Internally, it is proposed to reconfigure the core including, the removal of original structural columns and the replacement of historic decorative ceilings like-for-like (to enable the removal materials containing asbestos).



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The existing roof extensions detract from the simplicity of the elevation and its tripartite composition, diminishing the legibility of Sullivan's classical column concept as the design driver. Whilst the roof extension of c.1920 may be of some interest as a relatively successful design response to the host building, added only ten years after its completion, the 1980s extension above is more unfortunate. Concerns are not raised with regards to the recladding and part redesign of this extension as proposed. However the introduction of a roof terrace could result in a harmful impact if balustrading and other visual clutter such as planters further detract from the principal elevations. Consequently, we recommend that if a roof terrace is to be provided, it should be set considerably further back from the front of the building to avoid visibility in medium range views along Kingsway.

The removal of a small number of columns on each floor level would result in some harm given that it would disrupt the regularity of the structural grid, and the relatively early steel frame construction forms part of the significance of the listed building. However, the harm would be at a relatively low level ('less than substantial') and should be weighed against the public benefits arising from the alteration in accordance with NPPF 194 and 196.

The introduction of Crittal-style windows to broadly match the original design potentially represents an enhancement to significance, subject to suitable detailing. The original windows to the first floor featured much thicker mullions than those above, as this level formed part of the 'base' of the elevation. It is likely that they were deliberately differentiated from the windows of the middle section with a more robust appearance to reinforce the notion of the base supporting the floors above. We would encourage that this is replicated in the replacement windows so that the important elevational composition can be better appreciated.

## Recommendation

Your Authority should take these representations in account and determine the application in accordance with national and local planning policy and in consultation with your specialist conservation advice. We have drafted the necessary letter of authorisation for your Authority to determine the application as you see fit and have referred this to the National Planning Casework Unit (NPCU) (copy attached). You will be able to issue a formal decision once the NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.



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The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

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