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Planning and Built Environment
London Borough of Camden
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24 April 2020

Our ref: LJW/AKG/AROB/U0006860

Your ref: 2019/2773/P & 2019/2790/L // PP-08671331

FAO: Laura Hazelton

Dear Laura

Approval of details pursuant to Condition 14a (Planning Permission ref: 2019/2773/P)
Space House, 1 Kemble Street and 43-59 Kingsway, London, WC2B 4TE

We write on behalf of our client, SLQR Trustee No.1 Limited SLQR Trustee No.2 Limited as co-trustees of SQLR Trustee No.3, to formally discharge Condition 14a of planning permission ref: 2019/2773/P at Space House, 1 Kemble Street and 43-59 Kingsway, London, WC2B 4TS ('the Site').

Approved Development

On 26 November 2019 planning permission (ref: 2019/2773/P) and the associated listed building consent (ref: 2019/2790/L) were approved at the site for the following:

"Removal of existing roof plant equipment at 1 Kemble Street and erection of a single storey facsimile floor plus one setback floor; removal of roof plant from 43-59 Kingsway and erection of a single storey set-back extension; removal and replacement of the glazing to the existing enclosure of the southern external stair on Kingsway and new glazing at ground floor level across the site; enclosing the redundant petrol filling station area with slimline glazing; façade cleaning; new landscaping and public realm works and internal alterations to both buildings in connection with their refurbishment and change of use from Class B1 offices to Class A1/A3 and flexible Class B1 office / Office and events space (sui generis) at part ground and basement levels."

Condition 14a

Condition 14a states:

"Solar PV feasibility and details

Prior to discharge of the s106 Energy Efficiency & Renewable Energy Plan, a feasibility assessment with the aim of maximising the provision of solar photovoltaics should be submitted to the local planning authority and approved in writing."

Accordingly, a feasibility study reviewing the site's suitability to host a maximised amount solar photovoltaic panels from an architectural, heritage and energy perspective has been prepared by

Donald Insall Associates, Squire and Partners and Atelier 10 and submitted in support of this application.

The feasibility report finds that, although PVs are technically feasible at the site, they are not considered feasible overall due to:

i. Identified less than substantial harm caused to the listed building which is not outweighed by public benefits;
ii. Design, access and maintenance constraints; and
iii. The solar PVs would only generate 1.8% carbon emissions reduction, whereas the contribution of ASHPs as a renewable technology (for space heating only) achieves a 35.7% carbon reduction.

Design and Heritage

Due to the site's listing only the roofs have been assessed for the installation of a maximised amount of PVs as the special interest of the listed building is manifest in the fabric and of the highest significance are the external elevations of the tower, link-bridge and the Kingsway block.

A significant heritage benefit of the approved scheme is that it reduces the existing rooftop clutter by consolidating the rooftop plant. The Heritage Note prepared by DIA has demonstrated that, although it is feasible in technical terms, adding PV panels of the maximum possible size would result in additional clutter at roof level including: the PV panels themselves, permanent foldable guardrails and an access ladder to the Kingsway block. DIA state that these elements would detract from the significance of the listed building, causing it 'less than substantial harm'.

The additional clutter required for the PVs is also likely to be visible from the Kingsway Conservation Area.

The implications of the PVs on the approved design at the site are demonstrated in the plan, section and elevation drawings prepared by Squire and Partners, appended to the Feasibility Study.

The less than substantial harm identified to the listed building would not be outweighed by public benefits in terms of energy savings, as set out in the Atelier 10 report and the paragraph below.

Energy

Atelier Ten has summarised that although it is feasible to install PVs at the site they are not considered a requirement for the development to comply with the minimum 20% carbon contribution from LZC technologies as required by 2.16(a) of the s016 agreement, dated 26 November. This is because, since the receipt of planning permission and listed building consent detailed design work has led to the utilisation of air source heat pumps as the primary heating and cooling source for the whole site which has contributed to substantial carbon emission savings. The potential energy to be generated from PVs would not make a significant contribution to the overall carbon emission saving (less than 2%) even when maximised in area on both roofs.

Conclusion

A thorough feasibility study assessing the site's capability to host a maximised level of solar PV panels has been conducted.

The Heritage Report, prepared by Donald Insall Associates concludes that **"the study has shown that installing PVs at the site would not preserve the special interest of the listed building and its setting and the character and appearance of the Kingsway Conservation Area in accordance with the 1990 Act. We therefore consider the proposals not to be acceptable in heritage terms."**

DIA's conclusions, combined with Atelier 10's conclusion that PVs would not contribute to carbon savings at the site, demonstrates that PVs are not suitable or feasible at the site.

It is considered that the information provided fully responds to condition 14(a) and the condition should be duly discharged.

Submission Documents

In support of this approval of details application, the following documents have been submitted electronically via planning portal (ref: PP-08671331):

- Completed application form;
- Photovoltaic Technology Feasibility Study, prepared by Atelier 10;
- Solar PV Feasibility Assessment, prepared by Squire and Partners, dated April 2020;
- Heritage Note – PV Panels, prepared by Donald Insall Associates; and
- Drawings demonstrating the implications of solar PVs on the approved building design, prepared by Squire and Partners.

The applicant will make a payment of **£141**, which includes the requisite application fee of £116 and the £25 planning portal admin fee.

We would be grateful if you could confirm receipt and validation of this application. In the meantime, please contact Anna Gargan (020 7518 7240) or Amy Robinson (020 3486 3609) of this office should you have any questions.

Yours faithfully

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