

<b>Address:</b>	<b>Space House</b> <b>1 Kemble Street</b> <b>43-59 Kingsway</b> <b>London</b> <b>WC2B 6TE</b>		<b>2 &amp; 3</b>
<b>Application Number(s):</b>	2019/2773/P	<b>Officer: Laura Hazelton</b>	
<b>Ward:</b>	Holborn & Covent Garden		
<b>Date Received:</b>	<b>28/05/2019</b>		
<b>Proposal: 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; enclosure of the southern external stair at ground floor level on Kingsway with slimline glazing replacement windows and new glazing at ground floor level across the site; enclosing the redundant petrol filling station area with slimline glazing; facade 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 flexible Class A1/A3 (retail/restaurant) and flexible Class A1/A3 (retail/restaurant) and a flexible B1 office / office and events space (Sui Generis) at part ground and basement levels.</b>			
<b>Background Papers, Supporting Documents and Drawing Numbers:</b>			
Existing drawings 18077-SQP-ZZ-ZZ-DP-A-PL00001 rev A, 18077-SQP-ZZ-B2-DP-A-PL00002 rev A, 18077-SQP-ZZ-B1-DP-A-PL00003 rev A, 18077-SQP-ZZ-00-DP-A-PL00004 rev A, 18077-SQP-ZZ-01-DP-A-PL00006 rev A, 18077-SQP-ZZ-02-DP-A-PL00007 rev A, 18077-SQP-ZZ-03-DP-A-PL00008 rev A, 18077-SQP-ZZ-04-DP-A-PL00009 rev A, 18077-SQP-ZZ-05-DP-A-PL00010 rev A, 18077-SQP-ZZ-06-DP-A-PL00011 rev A, 18077-SQP-ZZ-07-DP-A-PL00012 rev A, 18077-SQP-ZZ-08-DP-A-PL00013 rev A, 18077-SQP-ZZ-09-DP-A-PL00014 rev A, 18077-SQP-ZZ-10-DP-A-PL00015 rev A, 18077-SQP-ZZ-11-DP-A-PL00016 rev A, 18077-SQP-ZZ-12-DP-A-PL00017 rev A, 18077-SQP-ZZ-13-DP-A-PL00018 rev A, 18077-SQP-ZZ-14-DP-A-PL00019 rev A, 18077-SQP-ZZ-15-DP-A-PL00019 rev A, 18077-SQP-ZZ-16-DP-A-PL00020 rev A, 18077-SQP-ZZ-RF-DP-A-PL00021 rev A, 18077-SQP-01-ZZ-DE-A-PL00300 rev A, 18077-SQP-01-ZZ-DE-A-PL00301 rev A, 18077-SQP-01-ZZ-DE-A-PL00302 rev A, 18077-SQP-01-ZZ-DE-A-PL00303 rev A, 18077-SQP-01-ZZ-DE-A-PL00304 rev A, 18077-SQP-01-ZZ-DS-A-PL00600 rev A.			
Demolition drawings 18077-SQP-ZZ-B2-DP-A-PL01002 rev A, 18077-SQP-ZZ-B1-DP-A-PL01003 rev A, 18077-SQP-ZZ-00-DP-A-PL01004 rev B, 18077-SQP-ZZ-01-DP-A-PL01006 rev A,			

18077-SQP-ZZ-02-DP-A-PL01007 rev A,	18077-SQP-ZZ-03-DP-A-PL01008 rev A,
18077-SQP-ZZ-04-DP-A-PL01009 rev A,	18077-SQP-ZZ-05-DP-A-PL01010 rev A,
18077-SQP-ZZ-06-DP-A-PL01011 rev A,	18077-SQP-ZZ-07-DP-A-PL01012 rev A,
18077-SQP-ZZ-08-DP-A-PL01013 rev A,	18077-SQP-ZZ-09-DP-A-PL01014 rev A,
18077-SQP-ZZ-10-DP-A-PL01015 rev A,	18077-SQP-ZZ-11-DP-A-PL01016 rev A,
18077-SQP-ZZ-12-DP-A-PL01017 rev A,	18077-SQP-ZZ-13-DP-A-PL01018 rev A,
18077-SQP-ZZ-14-DP-A-PL01019 rev A,	18077-SQP-ZZ-15-DP-A-PL01019 rev A,
18077-SQP-ZZ-16-DP-A-PL01020 rev B,	18077-SQP-ZZ-RF-DP-A-PL01021 rev B,
18077-SQP-01-ZZ-DE-A-PL01300 rev B,	18077-SQP-01-ZZ-DE-A-PL01301 rev B,
18077-SQP-01-ZZ-DE-A-PL01302 rev B,	18077-SQP-01-ZZ-DE-A-PL01303 rev B,
18077-SQP-01-ZZ-DE-A-PL01304 rev B	

#### Proposed drawings

18077-SQP-ZZ-B2-DP-A-PL20002 rev A,	18077-SQP-ZZ-B1-DP-A-PL20003 rev A,
18077-SQP-ZZ-00-DP-A-PL20004 rev B,	18077-SQP-ZZ-01-DP-A-PL20006 rev A,
18077-SQP-ZZ-02-DP-A-PL20007 rev A,	18077-SQP-ZZ-03-DP-A-PL20008 rev A,
18077-SQP-ZZ-04-DP-A-PL20009 rev A,	18077-SQP-ZZ-05-DP-A-PL20010 rev A,
18077-SQP-ZZ-06-DP-A-PL20011 rev A,	18077-SQP-ZZ-07-DP-A-PL20012 rev A,
18077-SQP-ZZ-08-DP-A-PL20013 rev B,	18077-SQP-ZZ-09-DP-A-PL20014 rev B,
18077-SQP-ZZ-10-DP-A-PL20015 rev B,	18077-SQP-ZZ-11-DP-A-PL20016 rev B,
18077-SQP-ZZ-12-DP-A-PL20017 rev B,	18077-SQP-ZZ-13-DP-A-PL20018 rev B,
18077-SQP-ZZ-14-DP-A-PL20019 rev B,	18077-SQP-ZZ-15-DP-A-PL20020 rev B,
18077-SQP-ZZ-16-DP-A-PL20021 rev B,	18077-SQP-ZZ-RF-DP-A-PL20022 rev B,
18077-SQP-ZZ-RF-DP-A-PL20023 rev B,	18077-SQP-01-ZZ-DE-A-PL20300 rev B,
18077-SQP-01-ZZ-DE-A-PL20301 rev B,	18077-SQP-01-ZZ-DE-A-PL20302 rev B,
18077-SQP-01-ZZ-DE-A-PL20303 rev B,	18077-SQP-01-ZZ-DE-A-PL20304 rev B,
18077-SQP-01-ZZ-DS-A-PL20600 rev B.	

#### Documents

Design and Access Statement dated May 2019 and Substitution Pack dated September 2019 prepared by Squire & Partners

Historic Building Report and Heritage Views Impact Assessment prepared by Donald Insall Associates dated May 2019

Town Planning Statement prepared by Gerald Eve LLP dated 24 May 2019

Daylight and Sunlight Report dated May 2019 prepared by Point 2 Surveyors

Energy Statement - State 2 ref: 8099 issue no.11 dated 07/09/2019 prepared by RES

Sustainability statement ref:8099 issue no.3 dated 21/05/2019 prepared by RES

Drainage Strategy Repot ref: 101478-PF-ZZ-XX-RPT-D-0001 dated May 2019 prepared by Pell Frischmann

Air Quality Assessment ref: 25738-RP-SU-001 dated 20 May 2019 prepared by Hilson Moran

Transport Assessment dated May 2019 prepared by Caneparo Associates

Outline Construction Logistics Plan dated August 2019 prepared by Caneparo

Associates

Structural Summary Report dated May 2019 prepared by Pell Frischmann

Geotechnical & Geo-Environmental Desk Study dated January 2019 prepared by Pell Frischmann

Odour Risk Assessment ref: R07 prepared by Long and Partners

Draft Construction Management Plan prepared by Aecom

Waste Management Plan dated May 2019 prepared by Aecom

Landscape Design & Access Statement dated May 2019 prepared by Gustafson Porter and Bowman

Framework Operational Management Plan dated May 2019 prepared by Seaforth Land

Environmental Noise Survey Report ref 25748/ENS Rev3 dated 12 July 2019 prepared by Hann Tucker

Statement of community involvement dated May 2019 prepared by London Communications Agency.

**RECOMMENDATION SUMMARY: Grant conditional planning permission subject to a section 106 agreement.**

**Application number**

2019/2790/L

**Proposal: 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; enclosure of the southern external stair at ground floor level on Kingsway with slimline glazing replacement windows and new glazing at ground floor level across the site; enclosing the redundant petrol filling station area with slimline glazing; facade 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 flexible Class A1/A3 (retail/restaurant) and a flexible B1 office / office and events space (Sui Generis) at part ground and basement levels.**

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Existing drawings

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18077-SQP-ZZ-09-DP-A-PL00014 rev A, 18077-SQP-ZZ-10-DP-A-PL00015 rev A,  
18077-SQP-ZZ-11-DP-A-PL00016 rev A, 18077-SQP-ZZ-12-DP-A-PL00017 rev A,  
18077-SQP-ZZ-13-DP-A-PL00018 rev A, 18077-SQP-ZZ-14-DP-A-PL00019 rev A,  
18077-SQP-ZZ-15-DP-A-PL00019 rev A, 18077-SQP-ZZ-16-DP-A-PL00020 rev A,

18077-SQP-ZZ-RF-DP-A-PL00021 rev A, 18077-SQP-01-ZZ-DE-A-PL00300 rev A,  
18077-SQP-01-ZZ-DE-A-PL00301 rev A, 18077-SQP-01-ZZ-DE-A-PL00302 rev A,  
18077-SQP-01-ZZ-DE-A-PL00303 rev A, 18077-SQP-01-ZZ-DE-A-PL00304 rev A,  
18077-SQP-01-ZZ-DS-A-PL00600 rev A.

#### Demolition drawings

18077-SQP-ZZ-B2-DP-A-PL01002 rev A, 18077-SQP-ZZ-B1-DP-A-PL01003 rev A,  
18077-SQP-ZZ-00-DP-A-PL01004 rev B, 18077-SQP-ZZ-01-DP-A-PL01006 rev A,  
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18077-SQP-ZZ-08-DP-A-PL20013 rev B, 18077-SQP-ZZ-09-DP-A-PL20014 rev B,  
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18077-SQP-ZZ-16-DP-A-PL20021 rev B, 18077-SQP-ZZ-RF-DP-A-PL20022 rev B,  
18077-SQP-ZZ-RF-DP-A-PL20023 rev B, 18077-SQP-01-ZZ-DE-A-PL20300 rev B,  
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 Statement of community involvement dated May 2019 prepared by London Communications Agency.

**RECOMMENDATION SUMMARY: Grant conditional listed building consent.**

<b>Applicant:</b>	<b>Agent:</b>
c/o agent	Gerald Eve LLP 72 Welbeck Street London W1G 0AY

**ANALYSIS INFORMATION**

<b>Land Use Details:</b>			
	Use Class	Use Description	Floorspace (GIA sqm)
Existing	<i>B1a Business - Office</i>		32,808
	<i>UKPN</i>		1,122
	TOTAL		33,930

Proposed	<i>B1a Business - Office</i>	31,050
	<i>Flexible B1 office and business events space (Sui generis)</i>	1,952
	<i>A1 / A3 Shop / Restaurant</i>	1,125
	<i>UKPN</i>	1,122
	TOTAL	35,249 (uplift =1,319)

Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	46	2
Proposed	3	1

## EXECUTIVE SUMMARY

The application site is Grade II listed, comprising a 17 storey cylindrical building (1 Kemble Street) and an 8 storey building (43-59 Kingsway) fronting Kingsway, partially within the Kingsway Conservation Area. The proposed works include the introduction of new retail and restaurant floor space at ground floor level, the introduction of new flexible office/event space at basement level and the refurbishment and improvement of the existing office floorspace across the remaining floors. The proposals would not provide any residential floorspace on site which is accepted given the listed status of the building, and the importance of the existing office use to the building's significance. A full policy-compliant payment in lieu of the residential requirement will be secured.

The proposed alterations include extensions to both buildings, external cleaning, refurbishment and replacement windows, new ground floor glazing and improvements to the public realm. The proposed works are considered to cause very minor harm to the significance of the building which is less than substantial and outweighed by the public benefits of the proposals including refurbishing and enhancing the appearance of the listed building and its setting, improvements to the public realm surrounding the buildings, and securing the optimum viable use as offices. Overall, the proposals are considered to enhance the character and appearance of the Kingsway Conservation Area. The proposed development would sensitively restore the listed building and provide high quality modern office floorspace which would comprise flexible floor layouts suitable for small and medium sized enterprises in accordance with employment policies.

The proposals would not cause undue harm to the amenity of neighbouring residents, and are considered acceptable in terms of their transport, sustainability, air quality, flood risk and waste and refuse implications.

The proposed development would support economic growth, create jobs, and support the success and vibrancy of the Central London Frontage in line with the vision of Camden 2025, Camden Plan and the draft Holborn Vision documents. The proposals would accord with the policies of the Camden Local Plan subject to the applicant entering into a S106 agreement securing management plans and additional contributions discussed in the body of this report.

## OFFICERS' REPORT

**Reason for Referral to Committee: Major development involving the construction of more than 10 new dwellings or more than 1000 sq. metres of non-residential floorspace [clause 3(i)]; and**

**Development involving any demolition (other than minor demolition) of any listed building (including locally listed buildings) and buildings considered to make a positive contribution to a conservation area [clause 3(iii)].**

### 1 SITE

- 1.1 The application site covers an area of approximately 0.376 hectares (3760sqm). The site is located on the west side of Kingsway, and is bounded by Keeley Street to the north, Kemble Street to the south and Wild Street to the west. The borough boundary with Westminster runs along Kemble Street and Wild Street to the south and west of the site.



*Figure 1 – The existing site viewed from Kingsway*

- 1.2 The Site comprises a 17-storey cylindrical building with rooftop plant equipment (1 Kemble Street) which is connected at first and second floor levels by a pedestrian link bridge to a ground plus 7 storey building (43-59 Kingsway) which fronts onto Kingsway. The two blocks are also connected by two



subterranean levels forming a large underground car park equipped with a small on-site filling station (now redundant).

- 1.3 Space House was built in 1964-68 as a speculative office and showroom development and designed by architect George Marsh of Richard Seifert and Partners who were concurrently working on Centre Point (now Grade II listed). Space House itself was Grade II listed in 2015.
- 1.4 The rectangular Kingsway block is located within the Kingsway Conservation Area. The tower behind it is not within a conservation area but is adjacent to the Kingsway and Seven Dials (Covent Garden) Conservation Areas in Camden, and the Strand Conservation Area in the City of Westminster. The site is also within the setting of a number of other listed buildings, including the Grade II-listed Kodak House opposite Keeley Street; the Grade II\* Connaught Rooms immediately north of this; the Grade II\* Freemasons Hall to the northwest of the site; the Grade II-listed Bruce House to the south; and the Grade II-listed Kingsway Chambers and 40-42 Kingsway to the northeast. The site is also located within the London Suburbs Archaeological Priority Area and within the London View Management Framework (LVMF), specifically, view 16A: The South Bank: outside Royal National Theatre.
- 1.5 The heights of surrounding buildings vary between 5 and 8 storeys, with the tower (1 Kemble Street) being the tallest building in the immediate area. The surrounding area is characterised by a mixture of commercial, retail, office, residential and education uses.
- 1.6 The site has a Public Transport Accessibility Level (PTAL) rating of 6b (the highest). The site is a five minute walk from Holborn Underground Station (to the north) and a ten minute walk from Temple Underground Station (to the south) and Covent Garden (to the west).

## **2 THE PROPOSAL**

- 2.1 Planning permission and listed building consent are sought for the refurbishment and extension of the existing office building to provide a new mixed-use building. The proposals comprise:

- The change of use of 1,125sqm of existing class B1 office floorspace at ground floor to provide new class A1/A3 retail/restaurant floorspace fronting onto Kingsway and a new café/bar at the base of the tower fronting Wild Street and Keeley Street within new glazed enclosure beneath former petrol station canopy. The detailed layout including the number of units and final disposition of A1 and A3 uses is shown for

indicative purposes in the application but is intended to be subject to further approval by the local planning authority prior to occupation.

- The retention and refurbishment of 31,050sqm of existing class B1 office floorspace, including replacement windows to both buildings, and internal alterations.
- The change of use of 1,952sqm ancillary class B1 floorspace at basement level (currently in use as car parking and plant) to flexible office and business events space (sui generis) at basement level. The area in question will be used either for ancillary presentation events associated with the B1 tenants of the building, or for a mix of other events such as external business meetings, exhibitions, day and evening events and displays under the operation of a specialist events management company. The mixed use nature of this space as intended by the applicant – for both external events as well as ancillary to the tenants of the building is considered to be a Sui-Generis use – which is uses falling outside of any one class of the Use Classes Order.
- The removal of existing roof plant at 1 Kemble Street, and the erection of a single storey facsimile extension at level 16 and single storey glazed set back extension at level 17.
- The removal of the existing plant enclosure from the Kingsway block and the erection of a new single storey set-back extension with associated terrace.
- At ground floor level, removal and replacement of the glazing to the existing enclosure of the southern external stair on Kingsway, and new glazing beneath former petrol station canopy to provide new A1/A3 seating.
- Improvements to the surrounding public realm to complement the new flexible retail uses proposed at ground floor.
- Removal of existing basement car parking and demolition of two of the three existing access ramps to provide new cycle parking, end of journey facilities, plant storage, and servicing.

## Revisions

2.2 The following revisions were made to the proposals:

- The proposed glazed extension to the tower was reduced in height by 400mm around the outer ring, with revisions to the detailed design including a thicker concrete band with increased overhang above, and new, more pronounced mullions to windows. The glazed balustrade at this level was reduced in height, set back by an additional 350mm and changed to metal to reduce its visibility.

- Confirmation of the retention and re-use of existing concrete band at top of the tower rather than the previously proposed demolition and facsimile recreation.
- The Kingsway roof extension was reduced in height by 400mm and pulled back from the southern elevation by an addition 7.5m and a new terrace introduced.
- The new glazing beneath the former petrol station canopy to the western end of the site was pulled in from the outer edge of the canopy by an additional 700mm.
- The detailed design of the ground floor shopfronts fronting Kingsway were amended to introduce details in reference to the original architectural drawings and artist impressions of the building prior to construction.
- The proposal to remove the existing staircase enclosure to the southern Kingsway block staircase and install new slimline glazing surrounding the staircase and two pilotis (sculptural columns) was revised to only include replacement glazing on the same footprint as existing.



*Figure 2 – The proposed site*

### 3 RELEVANT HISTORY

#### The site

- 3.1 **20841** - Change of use of 33,633 sq.ft. of vacant showrooms on the ground and first floors of the rectangular block fronting Kingsway, and the first and second floors of the circular tower block to the rear to offices. Refused 03/07/1975.
- 3.2 **21386** - Change of use of the first floor of the rectangular block, the first and second floors of the tower block and the bridges connecting the two buildings from showrooms to offices and ancillary uses for the Civil Aviation Authority, including a Medical Centre, Meeting Rooms, Staff Recreation Facilities, an internal telephone exchange and telex facilities. Granted 08/01/1976.
- 3.3 **23022** - The extension of the existing walkway at roof level to form a viewing platform. Granted 24/09/1976.
- 3.4 **25118** - Use of ground floor front of the Kingsway Block (nos.45-59 Kingsway), which is vacant, as offices and library. Refused 21/04/1978.
- 3.5 **PS9705187R1** – Enclosure of external fire escape. Granted 17/04/1998.
- 3.6 **PSX0004091** – New entrance and extended canopy on Kingsway frontage. Approved 14/03/2000.

#### The area

- 3.7 **2017/1611/P** - 4 Wild Court & 75 Kingsway - Change of use from private college (Class D1) on Wild Court and retail unit (Class A1) on Kingsway and erection of new 7th and 8th floor roof extensions to provide a new 3909sqm (GIA) 211 bedroom hotel (Class C1), plus reinstatement of commercial entrance and ancillary café onto Kingsway, and new plant and PV panels on roof". Granted 23/11/2017. Development implemented.

### 4 CONSULTATION SUMMARY

#### STATUTORY

##### 4.1 Historic England

- No comments.

##### 4.2 Council for British Archaeology

- No comments.

#### 4.3 20<sup>th</sup> Century Society

- Object to two elements of the proposals – the size of the proposed rooftop extension to 1 Kemble Street and to the enclosure of space at ground floor level.
- We are concerned that the increased size of the recessed rooftop floor will detract from the uniformity of the tower's façade, and will obscure views of the decorative cornice that tops the external concrete grid.
- Principal objection is to the enclosure of the ground floor space beneath both buildings. The open space beneath the buildings is a key element of the composition of the two buildings and surrounding public space, as it creates the sense of the building floating above street level, and opens up views of 1 Kemble Street from Kingsway. This open space is integral to the revealing of 1 Kemble from Kingsway and it is regrettable that its effect is currently greatly diminished by the previous enclosure of the southern stair.
- The exposed piloti are key contributors to the building's design, creating a remarkable sense of drama within the streetscape. Their enclosure behind glazed facades will cause harm to the building's architectural interest by removing a design feature that is characteristic of Seifert's style, as well as blocking views of them and public access to them.
- The society is opposed to the concept of glazing beneath the filling station canopy. The design is not sensitive to the high degree of geometric complexity seen across the two buildings, and will impede understanding of this element's original function. The canopy is remarkable as a large expanse of cantilevered pre-cast concrete that elegantly fans out across the open space.

#### *Officer's response:*

- *The proposed tower extension was reduced in height and the design revised. Please refer to section 8.33.*
- *The proposed enclosure of the southern staircase and piloti was removed from the proposals and now includes the replacement of the glazing within the existing enclosure with new slim line glazing.*
- *Please refer to section 8.43 for discussion of petrol station canopy.*

#### 4.4 Westminster City Council

- No comment.

#### 4.5 Environment Agency

- No response.

#### Local groups/stakeholders

#### 4.6 Covent Garden Community Association (CGCA)

- In principle we support the refurbishment of Space House to a high standard. In particular we support the removal of the accretions around the ground floor that ruin the appearance of the building and hide key design features; the use of glass walls seems an appropriate solution to competing challenges of openness versus security.
- Support the installation of openable windows and reduction of the need for air handling equipment.
- Support the plans for ongoing cleaning to maintain the appearance of the concrete and glass facades.
- We are content to see the increase in height of the solid part of the tower, as long as it does not rise above the current equipment line. It is an opportunity to deal with an untidy roofscape that is visible from many parts of Covent Garden and even from across the river. All plant should be contained within this envelope.
- There are operational details that could have a significant impact upon residential amenity and we ask you to attach the following conditions. Without these, we would object to the application:
  - a. Any use of the exterior forecourt for commercial activity to be restricted in time to 9am to 7pm Monday to Saturday and 10am to 6pm on Sundays. The owners have suggested a café use there, as well as discussing with us events such as film screenings and farmers' markets.
  - b. Use of the 500 person events space to be restricted in time to 8am and 10pm Monday to Friday, 9am to 10pm on Saturdays and 10am to 6pm on Sundays. We are disappointed that the applicant is suggesting a 1am terminal time, which is completely unsuitable for this area. Dispersal of persons leaving events after 9pm to be towards Kingsway.
  - c. Deliveries to be restricted a) in time to 8am to 8pm Monday to Saturday, 10am to 6pm on Sundays and b) in number to 50 per day Monday to Saturday, 10 on Sundays. The developers had told us that all deliveries would be restricted to 8am to 6pm, so we are disappointed that this is not reflected in the draft DSP.
  - d. Waste collections to be restricted in time to 8am to 8pm Monday to Saturday.

- e. Lighting levels and location of smoking areas to be decided with the agreement of residential neighbours.
- Concerns regarding hours and number of servicing trips.
- Waste collection trips should be reduced.
- More detail should be provided in the outline Construction Management Plan.

*Officer's response:*

- *The current application does not include proposals for the use of the exterior forecourt for events. Separate planning permission would be required which would be considered on its own merits.*
- *The proposed opening times for the event space are considered appropriate given its underground location. An operational management plan for this space would be secured by S106 agreement which will cover access/egress, security, management of the space, opening hours, etc.*
- *Following discussions with the Council's Environmental Health Officer, deliveries for the B1 uses will be between 8am – 6pm, and the flexible A1/A3 space will be between 7am – 6pm. Delivery and servicing will be set out in the final Servicing Management Plan which will be secured by S106 agreement, and these hours will be controlled by condition.*
- *The applicant is seeking waste collection times from 7am to prevent large refuse trucks being stuck in rush hour traffic. Final details will be submitted as part of the delivery and servicing plan secured by S106 to be approved by the council.*
- *Final details of lighting will be secured by condition (LB condition 3). Smoking areas cannot be controlled by planning. The applicant will employ a security management company who will ensure that behaviour in the public realm is managed and to discourage and remove anti-social behaviour.*
- *Please refer to section 15.27 – 15.28 for transport assessment of delivery and servicing.*

#### **4.7 Transport for London (TfL)**

- TfL accepts that the trip generation associated with the proposed development is unlikely to cause a severely negative impact on London's strategic walking, cycling, public transport and highway networks.
- TfL Spatial Planning agrees with the provision of a raised table crossing at the Keeley Street entry of the junction with Kingsway and would

suggest the Council considers funding this highway improvement via local CIL.

- Car parking would reduce from 48 to 4 spaces which is strongly supported in accordance with Policy T6 (Car parking) of the draft new London Plan. However, TfL seeks confirmation from the applicant that the 4 spaces left would be available for servicing and disabled parking only.
- The proposal for short-stay Cycle Parking is lower than the short-stay requirement under Policy T5 (Cycling) of the draft new London Plan and Table 10.2 (Minimum cycle parking standards). Justification is offered for this which may be acceptable to TfL, depending on the quality and accessibility of the long-stay cycle parking proposed.
- The development proposal would improve the pedestrian environment by removing the vehicular crossover on Kemble Street and reinstating it as footway, which is strongly supported under Policy T2 (Healthy Streets) of the draft new London Plan.
- The CMP is not acceptable and TfL Spatial Planning therefore currently objects to this application. We request production and submission of an Outline Construction Logistics Plan (CLP) in accordance with TfL guidance.

*Officer's Response:*

- *The four retained car parking spaces will include one disabled parking space; and two spaces will be provided as Electrical Vehicle Charging Spaces. The three 'standard' car parking spaces will be available to employees of the development. The Council's Transport Officer has confirmed the car parking provision is acceptable given the significant reduction in car parking overall. The development will also be secured as car-free by S106 so that tenants cannot obtain on-street car parking permits.*
- *The Council's Transport Officer has confirmed the cycle parking is considered acceptable as the requirement for over 50 short stay cycle spaces for the retail/restaurant use would be overly onerous.*
- *In recognition of TfL's concerns, an Outline Construction Logistics Plan has been prepared and submitted separate to this Transport Note. This gives greater consideration for how the development will be constructed and provides mitigation to alleviate concerns regarding the impact of construction traffic, in line with the Mayor's Healthy Streets Approach and TfL's CLP guidance (July, 2017). A final CMP will be secured by S106 to be approved by the Council prior to any works commencing on site.*



## **Adjoining Occupiers**

- 4.8 Site notices were displayed from the 31<sup>st</sup> May 2019 until the 24<sup>th</sup> June 2019. A press advert was placed on 6<sup>th</sup> June 2019 in the Camden New Journal.

## **Representations summary**

### **Letters of objection**

- 4.9 Four letters of objection were received from residents of the Peabody Estate, Wild Street in relation to the proposed opening hours of the retail/restaurant and event space:

- Although it is in the centre of town, it is quiet and undisturbed except for occasional drunk people walking down Wild Street and noises from the car park early in the morning. If there were to be a late licence, the likelihood is that many more loud drunken people would make noise outside our block on the Wild Street side which would make it impossible to sleep.
- The prospect of the proposed refurbishment involving market, cafe and late night entertainment and all the noise and extra traffic it would entail is quite frightening. It would make me very nervous especially at night. There are already many pubs and entertainment places in the local area and the traffic can be very heavy.
- The hours suggested are unacceptable in a residential area.

*Officer's Response: The hours of use of the new retail/restaurant uses and basement event space will be controlled by condition. The new retail/restaurant space and event space within the Kingsway block will be facing Kingsway rather than the quieter residential streets to the rear and given the basement location of the event space, the new uses are considered to have limited impact on the amenity of residential occupants of the Peabody Estate. An Operation Management Plan will be secured by legal agreement to be approved by the Council prior to occupation of the event space, which will include details of how the space will be managed, security, and details of how people will enter and leave the site (directly onto Kingsway). It will also include details of how local residents can contact management should they wish to report noise disturbance. It is acknowledged that the new retail/restaurant use beneath the former petrol station canopy has potential to cause more noise disturbance to residents, and as such, the opening hours for this unit are restricted to 08:00 – 12:00am Thursdays to Saturdays and 08:00am – 11:00pm on Sundays to Wednesdays and Bank Holidays. These hours, in conjunction with the relatively*

*small floor area in question (176sqm) are considered to ensure that the use would not result in harmful disturbance to neighbouring residents.*

#### Letters of support

4.10 Two letters of support, including one from Bee Midtown the Business Improvement District, were received making the points set out below.

- The scheme should enliven the public realm around the buildings on all sides.
- Cleaning the facades will be beneficial to the area.
- Upgrading windows should improve environmental performance of the buildings.
- Overall this scheme should produce an enhancement of the character and appearance of local conservation areas and a listed building.
- Midtown fully supports the proposals to develop Space House, as we believe they will deliver a number of benefits not only for the building but also the local area. In particular, the new landscaping, public realm works and internal alterations to the building marks significant investment into the preservation of a Grade II listed building. This would enhance the character and appearance of local conservation areas and this listed building. Through creating new public spaces and retail animating the site, this would open it up to public use. We believe that this will better support the area economically, providing ground floor space that fits the current market. This use of ground floor space will support Midtown's need for ground floor spaces that thrive, to bring people to the area and help the district prosper.
- In addition, the modest extensions to the existing buildings will deliver additional office spaces and jobs for the area. As demand for commercial floorspace continues to rise within Midtown we welcome the addition of high quality offices to help the area continue to be the best place in London to do business.
- The unrivalled transport networks, attractions and the location of Midtown means it has the opportunity to be a beacon of success for central London. This development will only add to the area's continued growth.

## **5 POLICIES & Guidance**

### **5.1 National Planning Policy Framework 2019**

### **5.2 The London Plan 2016 and the Draft London Plan**

### **5.3 Mayor's Supplementary Planning Guidance**

### **5.4 Camden Local Plan (2017)**

- G1 Delivery and location of growth
- H1 Maximising housing supply
- H2 Maximising the supply of self-contained housing from mixed-use schemes
- H4 Maximising the supply of affordable housing
- C5 Safety and security
- C6 Access for all
- E1 Economic development
- E2 Employment premises and sites
- A1 Managing the impact of development
- A2 Open space
- A3 Biodiversity
- D1 Design
- D2 Heritage
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding
- CC4 Air quality
- CC5 Waste
- TC1 Quantity and location of retail development
- TC2 Camden's centres and other shopping areas
- T1 Prioritising walking, cycling and car-free development
- T2 Parking and car-free development
- T3 Transport infrastructure
- T4 Sustainable movement of goods and materials
- DM1 Delivery and monitoring

### **5.5 Supplementary Planning Documents**

Camden Planning Guidance (2018/2019)

Access for all

Air quality

Amenity

Biodiversity  
Design  
Developer contribution  
Employment sites and business premises  
Energy efficiency and adaptation  
Interim housing  
Housing  
Public open space  
Town centres and retail  
Transport  
Water and flooding

Kingsway Conservation Area appraisal and management strategy 2001

Draft Holborn Vision and Urban Strategy

## ASSESSMENT

The principal considerations material to the determination of this application are considered in the following sections of this report:

<b>6</b>	<b>Consultation and procedure</b>
<b>7</b>	<b>Land use principles</b> <ul style="list-style-type: none"><li>- Introduction</li><li>- Creation of new retail/restaurant (A1/A3) floorspace</li><li>- Change of B1 floorspace to flexible B1/B1 event space</li><li>- Mixed use policy</li><li>- Conclusion</li></ul>
<b>8</b>	<b>Conservation and Design</b> <ul style="list-style-type: none"><li>- Statutory framework</li><li>- Policy review</li><li>- Designations</li><li>- Existing building and assessment of significance</li><li>- Kingsway / Seven Dials / Strand / Covent Garden Conservation Areas</li><li>- Listed buildings</li><li>- London View Management Framework</li><li>- Proposals and impact on significance<ul style="list-style-type: none"><li>- Tower roof extension</li><li>- Kingsway roof extension</li><li>- Ground floor alterations</li><li>- Kingsway Office Entrance</li><li>- Petrol station canopy</li><li>- Facades and fenestration</li><li>- Replacement southern stair enclosure</li><li>- Internal alterations</li></ul></li><li>- Public realm and landscaping</li><li>- Impact on significance conclusion</li><li>- Archaeological impact</li></ul>
<b>9</b>	<b>Impact on neighbouring amenity</b> <ul style="list-style-type: none"><li>- Policy review</li><li>- Daylight and sunlight</li><li>- Outlook/Overlooking</li><li>- Noise and disturbance</li><li>- Conclusion</li></ul>

<b>10</b>	<b>Land Contamination</b>
<b>11</b>	<b>Air quality</b>
<b>12</b>	<b>Sustainable design and construction</b> <ul style="list-style-type: none"> <li>- Policy review</li> <li>- Energy</li> <li>- Sustainability</li> </ul>
<b>13</b>	<b>Flood risk and drainage</b>
<b>14</b>	<b>Accessibility</b>
<b>15</b>	<b>Transport</b> <ul style="list-style-type: none"> <li>- Policy review</li> <li>- The site</li> <li>- Trip generation</li> <li>- Travel planning</li> <li>- External doors</li> <li>- Car parking</li> <li>- Cycle parking</li> <li>- Highway works</li> <li>- Pedestrian, Cycling and Environmental Improvements in the local area</li> <li>- Deliveries and servicing</li> <li>- Managing and mitigating the impacts of construction</li> <li>- Conclusion</li> </ul>
<b>16</b>	<b>Safety and security</b>
<b>17</b>	<b>Refuse and recycling</b>
<b>18</b>	<b>Employment and training opportunities</b>
<b>19</b>	<b>Planning obligations</b>
<b>20</b>	<b>Mayor of London's Crossrail CIL</b>
<b>21</b>	<b>Camden CIL</b>
<b>22</b>	<b>Conclusion</b>
<b>23</b>	<b>Recommendations</b>

<b>24</b>	<b>Legal comments</b>
<b>25</b>	<b>Conditions – planning application</b>
<b>26</b>	<b>Informatives – planning application</b>
<b>27</b>	<b>Conditions – listed building application</b>
<b>28</b>	<b>Informatives – listed building application</b>

## **6 Consultation**

### Consultation

- 6.1 A Statement of Community Involvement (SCI) has been submitted as part of the application which details the consultation that the applicant undertook prior to submitting their application. Early stakeholder consultation included emails to Holborn and Covent Garden ward councillors (Cllrs Sue Vincent, Julian Fulbrook and Awale Olad) on 8 April. Additional letters were sent on 18 April to the Cabinet Member for Investing in Communities (Cllr Danny Beales), Cabinet Member for Improving Camden's Environment (Cllr Adam Harrison), and local groups, offering meetings before public consultation exhibitions on Thursday 25 and Saturday 27 April 2019 at a venue close to the application site. The public exhibition was advertised by way of personally addressed letters to local groups, ward councillors and other key councillors, flyers to local residents and businesses, an advert in the Camden New Journal, and consultation updates via the applicant's website. Officers consider this consultation was sufficient.

## **7 Land use principles**

- 7.1 The principal land use considerations are as follows;

- Introduction
- Creation of new retail/restaurant (A1/A3) floorspace
- Change of B1 floorspace to flexible business event space (sui generis)
- Mixed use policy
- Conclusion

## Introduction

- 7.2 The site is located within the Central London Area in the InMidtown Business Improvement District. The site is not located within a retail frontage, although the High Holborn/Kingsway Central London Frontage includes the neighbouring building no.65 Kingsway which marks the end of the primary retail frontage. Camden Local Plan policy G1 seeks to deliver growth by securing high quality development and promoting the most efficient use of land and buildings.
- 7.3 The proposals seek to retain the existing building, which would be extended and refurbished to provide 1,125sqm new flexible retail/ restaurant floorspace and 1,952sqm new flexible business/business event space.

## Creation of new retail/restaurant (A1/A3) floorspace

- 7.4 The site is located in the Central London Area, adjacent to the High Holborn/Kingsway Central London Frontage, which ends at neighbouring property 65 Kingsway on the opposite side of Keeley Street.
- 7.5 Policy G1 seeks the provision of an appropriate amount of retail and food and drink uses in the Central London Frontages and Policy TC1 states that the Council will focus new shopping and related uses in Camden's designated growth areas and existing centres. In the Central London Frontages, the Council will promote the significant provision of new retail and other town centre uses in the Tottenham Court Road Central London Frontage, and 'additional' provision in the other Central London Frontages. The policy goes on to describe how the Council will apply a sequential approach to retail and other town centre uses outside of the frontage. Retail and other town centre uses should be located in designated centres, and it is only if suitable sites cannot be found within designated centres that the Council will consider edge of centre locations. In this instance, the site is an edge of centre location, located next door to the designated centre.
- 7.6 The proposals include the introduction of new retail/restaurant use at ground floor level. The new retail uses will predominantly be in the Kingsway building with new shopfronts fronting Kingsway, although there will also be a small area beneath the former petrol station canopy to provide a new café/bar. At this stage, the flexible A1/A3 ground floor layout is submitted as indicative only, as the actual split of units and their resultant entrances and shopfronts will be confirmed once tenants have been found. Details of the final ground floor layout and shopfront design will be secured by condition (Condition 21 and LB condition 3).



- 7.7 In this instance, the applicant does not own any other properties within the primary frontage, and given the application site sits adjacent to the existing Central London Frontage, it is considered an appropriate location for the introduction of new flexible retail and restaurant floorspace. The introduction of A1 retail floorspace in this location would extend the retail frontage along Kingsway and is considered to contribute positively to the mix and balance of uses in this area and activate the existing blank frontage onto Kingsway.
- 7.8 Policy TC2 states that the Council will make sure that food, drink and entertainment uses do not have a harmful impact on residents and the local area, and will focus such uses in Central London Frontages and Town Centres. The introduction of a new restaurant use in this location is considered to be in keeping with the character of the local area. Existing cafes/restaurants are located in the ground floor of the adjacent building 65 Kingsway and further north along Kingsway. There is limited retail or restaurant use surrounding and to the south of the site. The introduction of new restaurant uses would not result in an overprovision of restaurant use in this location and would not result in a harmful impact on the local area.
- 7.9 As such, the introduction of new retail or restaurant use outside of the designated frontage is considered appropriate in this location and would help to enliven and activate the existing dead frontage. The proposed ground floor A1/A3 uses are supported in terms of land use, and considered to accord with policies G1, TC1 and TC2 of the Camden Local Plan.

Change of B1 floorspace to flexible business event space (sui generis)

- 7.10 Policy E1 seeks to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. The policy sets out how the Council will secure this by, for example, supporting businesses of all sizes, in particular start-ups, small and medium-sized enterprises; maintaining a stock of premises suitable for a variety of businesses; supporting local enterprise development, employment and training schemes for Camden residents; and directing new office development to the growth areas, Central London, and the town centres.
- 7.11 Policy E2 encourages the provision of employment sites in the borough and protects 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. The Policy states that development of business premises and sites for non-business use will be resisted unless it is demonstrated that the site is no longer suitable for its existing business use, and that the possibility of retaining, reusing or

redeveloping the site or building for similar business use has been fully explored over an appropriate period of time.

- 7.12 Higher intensity redevelopment of premises that are suitable for continued business use will be considered when a number of criteria are met, including, the level of employment floorspace being increased or maintained; that existing businesses are retained if possible; the proposed premises include floorspace suitable for start-ups and small and medium sized enterprises (SMEs); and the scheme would increase employment opportunities for local residents, including training and apprenticeships.
- 7.13 The existing building is currently in B1a office use, and has been occupied by the Civil Aviation Authority (CAA) who are due to vacate the premises when their lease expires in December 2019. The proposals involve the intensification of the existing employment use at the site through the refurbishment and extension of the buildings to provide a total of 33,002sqm (GIA) B1 employment floorspace (including the flexible office / events space at basement level), which constitutes an increase of 194sqm employment floorspace.
- 7.14 Although the proposals result in a reduction of 1,758sqm B1a office floorspace to provide 1,952sqm new flexible event space, the floorspace in question is located at basement level and is currently ancillary office space comprising car parking, plant, and storage space. The basement level 2 and part of basement level 1 is proposed to be used for either ancillary office (B1a) floorspace associated with the B1 tenants of the building, or for a mix of other business use and events, such as external business meetings, exhibitions, day and evening events and displays under the operation of a specialist events management company. As such, the development would not result in a loss of existing usable office floorspace.
- 7.15 The space could be used by either internal or external occupants as flexible exhibition, event and/or interactive display space or for events ancillary to the office use. The proposed use is considered complementary to the existing office use at the site and given its location at basement level, would have limited impact on the ground floor functions and street level presence. A framework Operation Management Plan has been submitted which sets out the management principles of the space, including opening hours and a maximum occupancy of 500. If planning permission is granted, a detailed operational management plan setting how the space will be used, operated and managed will be secured by S106 agreement.
- 7.16 The applicant has advised that a prospective tenant has not been found to date, and that internally, the office floorspace has been designed to provide a flexible layout which could be subdivided as required should the space not be

let to a single tenant, in line with the requirements of policy E2. The proposed development would improve and refurbish the existing office floor space, bringing it up to current standards and ensuring the ongoing viable use of the premises as offices which complements the mix of the uses in the local area. Policy E2 also sets out that as well as seeking floorspace suitable for SMEs, the provision of affordable workspace should be explored. Although not set out in the policy itself, the supporting text to policy E2 states that the Council will seek to secure an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000sqm or more. In this instance, the proposed development would result in an uplift of 194sqm employment floorspace. The provision of affordable workspace was discussed with the applicant who advised it would make the development unfeasible alongside the additional contributions already secured. Although no affordable workspace is provided, the applicant has agreed to sign up to an Employment and Training Plan which would be secured by S106 agreement to provide apprenticeships to local residents during the construction phase and end phase of development (please refer to section 18).

- 7.17 Given the limited employment uplift proposed, the improved standard of office accommodation, new to the market and available to a number of varying business sizes, the other employment benefits secured (see section 18), and the fact that the development would make a full policy compliant contribution towards housing, this is considered acceptable in this instance. As such, the proposed development would intensify and enhance the existing employment floorspace at the site including provision for small and medium sized enterprises, in line with the requirements of policies E1 and E2 of the Camden Local Plan and is considered acceptable in this regard.

#### Mixed use policy

- 7.18 Policy H2 (Maximising the supply of self-contained housing from mixed use schemes) applies to all proposals for new build non-residential development and extensions involving a significant floorspace increase. Policy H2 specifically seeks provision of self-contained houses and flats (use class C3) in line with the priority land use of the Local Plan, as set out in Policy H1 (Maximising housing supply).
- 7.19 Policy H2 states that in the Central London Area, where development involves additional floorspace of more than 200sqm (GIA), the Council will require 50% of all additional floor space to be self-contained housing, including a proportion of affordable housing.
- 7.20 Where housing is required as part of a mix of uses, the Council will require self-contained housing to be provided on site, particularly when 1,000sqm (GIA) of

additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

7.21 The proposed development would involve a total uplift of 1,319sqm (GIA) additional commercial floorspace, which triggers the requirement for 659.5sqm housing to be provided onsite. In considering whether self-contained housing is required as part of a mix of uses, policy H2 sets out a number of criteria which the Council will take into account. Those relevant to the determination of the current application are as follows:

- the character of the development, the site and the area;
- site size, and any constraints on developing the site for a mix of uses;
- whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;
- the need to add to community safety by providing an active street frontage and natural surveillance;
- the impact of a mix of uses on the efficiency and overall quantum of development;
- whether an alternative approach could better meet the objectives of this policy and the Local Plan.

7.22 Given the quantum of floor area involved and the proposed uplift on site, the introduction of new residential housing could feasibly be delivered on site, for example within the Kingsway Block. However, on balance, the creation of new housing is not considered appropriate at the site for a number of reasons, principally, the Grade II Listed status of the building. Historic England's reasons for designation describe one of the main reasons for the site's listing as being due to its architectural interest as one of London's best speculative office buildings. The proposals would retain office use as the principal use of the site (over 93% of the floorspace would be retained as B1 use), and the repair and refurbishment would ensure the ongoing optimum viable use of the building in the manner in which it was intended. The introduction of residential use at the site would cause harm to the architectural and historic significance of the building. Furthermore, the introduction of residential use would impact the appearance and plan form of the building. For example, the external appearance would be altered as a result of the residential occupation, including blinds, curtains, internal décor and sporadic lighting across the building throughout the night time. A new core and entrance would be required for new residential use with implications on the characteristic circular office floorplate in the tower.

- 7.23 In terms of the quality of the potential residential accommodation, the dwellings within the tower would all be single aspect with no external amenity space as a result of the circular shape and depth of the floor plate. Residential use in the Kingsway block would suffer from noise disturbance and very poor air quality. The applicant has explored the potential of providing a third residential building on the site; however, the only possible location would be at the western side above the basement ramp which would not be able to structurally support a new building.
- 7.24 Consequently, although new residential units could potentially be provided at the site, this is not considered appropriate in this instance given the harm it would cause to the historic and architectural significance of the building and the substandard quality of accommodation that would be provided.
- 7.25 In line with the cascade approach of policy H2, the applicant has confirmed they do not own any alternative sites within the borough which could be used to provide the residential requirement and as such, commissioned a search of properties on the market on either a freehold or long leasehold basis in the vicinity of the site that could accommodate the required residential floorspace. Over 30 properties were shortlisted but were discounted for one or more the following reasons –
- The property had undergone a recent refurbishment to provide Category A offices and therefore it would not be appropriate or viable to undertake a conversion to residential use;
  - The floorspace was part of a new, purpose-built commercial development;
  - The property did not benefit from any amenity space;
  - There was no ability to provide a separate entrance and core to the residential use;
  - The property was listed and inappropriate for residential use.
- 7.26 The applicant has therefore agreed to make a contribution towards the supply of housing in the borough in lieu of on-site housing provision. Officers have reviewed the off-site property search and are satisfied with the scope of the search and reasons for the unsuitability of the available premises for residential use. As such, a payment in lieu is considered acceptable in this instance. If the development is found to be acceptable in all other regards, a S106 Legal Agreement would be secured with a clause to secure a contribution of £1,003,649.50. Calculations of the payment in lieu are provided in table 1 below.

Total addition to floorspace proposed	1,319sqm GIA
Total addition to floorspace proposed	2,063sqm GEA (provided by applicant)
Self-contained housing floorspace target	$1,319 \times 50\% = 659.5\text{sqm GIA}$
Capacity	$659 / 100 = 7$ additional homes
Self-contained housing floorspace target GEA	$2,063 \times 50\% = 1031.5\text{sqm GEA}$
Additional self-contained housing floorspace provision	0 sqm GIA
Affordable housing percentage target (capacity x 2%)	$7 \times 2\% = 14\%$
Affordable housing floorspace target (= shortfall in this scenario) GEA	$1031.5 \times 14\% = 144.41 \text{ sqm GEA}$
Payment-in-lieu of affordable housing (shortfall GEA x £2,650 psm)	$144.41 \times £2,650 = £382,686.50$
Market housing percentage target (100% minus affordable %age target)	$100 - 14\% = 86\%$
Market housing floorspace target (= shortfall in this scenario) GEA	$1031.5 \times 86\% = 887.09\text{sqm GEA}$
Payment in lieu of market housing (shortfall GEA x £700 psm)	$887.09 \times £700 = £620,963.00$
<b>Total payment</b> (different affordable and market housing shortfalls)	$£382,686.50 + £620,963.00 =$ <b>£1,003,649.50</b>

*Table 1: Payment in lieu of residential floorspace calculation*

### Conclusion

7.27 The proposed development would result in an overall uplift of employment floorspace at the site, and although there would be a slight reduction in office space, in reality, this floorspace is used as ancillary car parking and plant. The proposals would convert this into usable, flexible office space or complementary event space. New retail and restaurant use would be introduced at ground floor level which is considered appropriate in this location and would activate the frontage onto Kingsway. Officers do not consider it appropriate to introduce new residential use due to the harm that would be caused to the listed building's architectural and historic significance, and consequently, a payment in lieu is acceptable in this instance.

7.28 As such, the proposed development is considered acceptable in land use terms and would comply with policies G1, E1, E2, TC1, TC2, and H2 of the Camden Local Plan.

## **8 Conservation and Design**

8.1 The conservation, heritage and design considerations are as follows:

- Statutory framework
- Policy review
- Designations
- Existing building and assessment of significance
- Kingsway / Seven Dials / Strand / Covent Garden Conservation Areas
- Listed buildings
- London View Management Framework
- Proposals and impact on significance
  - Tower roof extension
  - Kingsway roof extension
  - Ground floor alterations
  - Kingsway Office Entrance
  - Petrol station canopy
  - Facades and fenestration
  - Replacement southern stair enclosure
  - Internal alterations
- Public realm and landscaping
- Impact on significance conclusion
- Archaeological impact

### Statutory Framework and Implications

- 8.2 Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”) are relevant.
- 8.3 Section 16(2) provides that in considering whether to grant listed building consent for any works to a Listed Building special regard must be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 8.4 Section 66(1) provides that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority 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.
- 8.5 Section 72(1) requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area.

- 8.6 The effect of these sections of the Listed Buildings Act is that there is a statutory presumption in favour of the preservation of the character and appearance of Conservation Areas and the preservation of Listed Buildings and their settings. Considerable importance and weight should be attached to their preservation. A proposal which would cause harm should only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the presumption. The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified (section 16). This section of the report assesses the harm to heritage assets from the proposal. The balance of the harm and the benefits from the proposed scheme is discussed in the conclusion.

#### Policy review

- 8.7 NPPF section 16 paragraphs 192 to 197 in particular, London Plan policies 7.1, to 7.7, Camden Local Plan policies D1 and D2 and CPG (Design) are relevant with regards to conservation and design.
- 8.8 The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

#### Designations

- 8.9 Space House was Grade II listed in 2015, and the rectangular Kingsway block is located within the Kingsway Conservation Area. The tower behind it is not within a conservation area but is adjacent to the Kingsway and Seven Dials (Covent Garden) Conservation Areas in Camden, and the Strand Conservation Area in the City of Westminster. The site is also within the setting of a number of other listed buildings, including the Grade II-listed Kodak House on the opposite side of Keeley Street; the Grade II\* Connaught Rooms immediately north of this; the Grade II\* Freemasons Hall to the northwest of the site; the Grade II-listed Bruce House to the south; and the Grade II-listed Kingsway Chambers and 40-42 Kingsway to the northeast. Nos. 36 and 38 Kingsway and Victoria House on the opposite side of Kingsway are described as making a positive contribution to the character and appearance of the Conservation Area in the Kingsway Conservation Area Statement.



8.10 The site is also located within the London Suburbs Archaeological Priority Area and within the London View Management Framework (LVMF), specifically, view 16A: The South Bank: outside Royal National Theatre.



*Figure 3: Map of listed buildings in the vicinity of the site (outlined in red)*

#### Existing building and Assessment of significance

8.11 Space House was built in 1964 – 68 as designed by architect George March of Richard Seifert and Partners, London's most prolific mid-century commercial practice. The buildings were constructed as a speculative office and showroom development for London property mogul Henry Hyams.

8.12 The site comprises two buildings: an eight-storey slab block facing Kingsway and a 15-storey (plus basements) cylindrical tower to the rear of the site, connected by a two-storey bridge link. The primary significance of the buildings lie in their innovative use of a partial pre-cast concrete frame and how this is expressed in their differing slab and cylindrical forms, their spatial relationship

and external elevations. The sculptural way in which the structure is handled, with interlocking cruciform shapes and Y-shaped pilotis (sculptural ground floor columns) on the tower in polished concrete, and tapered pilotis and slab formation in polished granite on the Kingsway block, creates a striking sculptural effect and serves to dramatise the relationship between the two buildings. The side elevations of the Kingsway block, which include interlocking structures inspired by a Greek-key motif, also make an artistic contribution to the surrounding public realm.

8.13 The sense of openness at ground floor level and that of a floating structure above supporting piloti are concepts inspired by Italian and South American architects such as Gio Ponti and Felix Candela, as well as contemporary US Modernists like Gordon Bunshaft and Edward Durell Stone. This aspect of design is fundamental to the significance of the building as is the variation in external treatment of the two structures which at once both unites and sets up a tension between the two buildings.

8.14 The site was first listed as Grade II on 26 January 2015. The listing description sets out the reasons for designation as being due to its architectural, technical and historic interest:

- Architectural interest: as one of London's best speculative office buildings, whose arresting yet subtly-handled exteriors reflect many of the 'Pop' themes at play in the contemporary Centre Point development;
- Technical interest: for the innovative use of a precast concrete grid, a form of partial prefabrication that allowed for rapid construction without the use of scaffolding, as well as for striking visual effects;
- Historic interest: as an icon of the 1960s commercial property boom, built by the most successful developer-architect partnership of the day, its assertive styling reflecting the confidence and dynamism associated with the period.

8.15 The listing description sets out how the interiors of both buildings were never particularly elaborate, and have been much altered in both cases. In the Kingsway block the main feature – originally an external one – is the south stair, whose lower flights form a vertiginous construction with floating concrete treads and white mosaic soffits. The lobby area at the north end has been remodelled and enlarged. Original elements include the floating entrance canopy (now extended) and the black marble revetments to the side wall, with a gilt inscription naming the original architects and builders. The new elements, including the veneer panelling and the flying metal stair, are not of special interest. The open-plan office interiors are not of special interest, nor is the plant room on the roof. Externally, detracting features of the Kingsway block

include the modern enclosure around the former external stair on the south side of the Kingsway block, which also obscures the tapered pilotis, the modern glazed and aluminium panelled façade fronting onto Kingsway, as well as the modern glazing to the north entrance and extended canopy.

- 8.16 The tower lobby is described as not being of special interest and has been very much altered, with the main staircase to the former first-floor showroom removed and all surfaces renewed; the secondary stair with its terrazzo floor and white mosaic cladding survives behind. The doughnut-shaped office floors are also not described as being of special interest. Externally, detracting elements of the tower include the modern plant and telecommunications equipment on the roof, which are also visible in long-distance views from Kingsway and Russell Street in Covent Garden, the modern double-height glazed façade and entrance sign at ground floor level, together with exposed low-level plant.
- 8.17 The main features associated with the underground parking arrangements are the entrance and exit ramps, which curve sinuously around the feet of the tower pilotis; with the angular flying access stairs also contributing to the drama. The subterranean parking and service areas themselves are described as not being of special interest.
- 8.18 Externally, the existing perimeter fence and security kiosk are not of special interest. The two surviving features are the intake and extractor units to the air conditioning system. The former, at the junction of Keeley Street and Wild Street, is encased within a kidney-shaped sculptural feature clad in white mosaic; the latter, further along Keeley Street, is concealed beneath a polygonal concrete bench.

#### Kingsway / Seven Dials / Strand / Covent Garden Conservation Areas

- 8.19 The rectangular Kingsway block is located within the Kingsway Conservation Area. The tower behind is not located within a conservation area but is adjacent to the Kingsway and Seven Dials (Covent Garden) Conservation Areas in Camden, and the Strand and Covent Garden Conservation Areas in the City of Westminster.
- 8.20 The Kingsway Conservation Area Statement describes Kingsway as an outstanding example of early 20<sup>th</sup> century commercial architecture, whose character contrasts strongly with the gardens and legal precinct of Lincoln's Inn Fields to the east and the smaller buildings of Covent Garden to the west. Individually the buildings provide a range of architectural detail and there is some difference in quality. The whole however is cohesive; a distinct boulevard character was created a century ago and remains largely intact. Space House

is described as an isolated 1960s building, with the Kingsway block sitting 'fairly easily with its Edwardian neighbours, helped by the continuation of the street trees'.

- 8.21 The proposed development would see an additional set back storey added to the Kingsway block and a two storey extension to the tower, one of which would be a facsimile reproduction of the floors below with a set-back glazed extension above. The facades would be repaired and refurbished with new windows and spandrels and a new high quality glazed shopfront onto Kingsway replacing the existing unsympathetic aluminium frontage. The proposed alterations would retain the relationship between the two buildings in terms of their heights, with limited impact on views within the Kingsway Conservation Area due to them being set back from the edge of the buildings. The proposed refurbishment of the Kingsway frontage would represent an improvement to the appearance of both the building and the Conservation Area in this location. The Kingsway building would retain its relationship with the neighbouring buildings and preserve and enhance the boulevard character of Kingsway which contributes to the significance of the Conservation Area.
- 8.22 There are glimpse views of the tower above the Freemason's Hall when viewed from the north end of Wild Street, within the Seven Dials (Covent Garden) Conservation Area. The special character of the Seven Dials Conservation Area is found in the range and mix of building types and uses and the street layout. The character is not dominated by one particular period or style of building but rather it is their combination that is of special interest. The proposed development would see the replacement of the existing unattractive roof top plant which detracts from the significance of the building within a new high quality roof extension. Views of the building from within the Covent Garden Conservation Area would be improved, and the development would not harm the significance of the conservation area.
- 8.23 The site borders the Strand and Covent Garden Conservation Areas within Westminster. The London Borough of Westminster were consulted and had no comments on the proposals.

#### Listed buildings

- 8.24 The site is located within the setting of a number of listed buildings, the closest being Grade II listed Kodak House on the north side of Keeley Street, Grade II\* Connaught Rooms immediately north, Grade II\* Freemasons Hall to the north west, and Grade II listed Bruce House to the south of the site in Westminster.
- 8.25 Kodak House is described in the conservation area statement as a distinctive Portland stone building which establishes the scale of Kingsway when

approached from the south. The building has classic simplicity but has decorative detail to the roof and superb bronze entrance doors. Pevsner in 1957 noted it as “the only building of architectural importance in Kingsway. For here is an early example of a commercial building to which the future belonged”. As such, the building’s architectural and historic interest are considered to contribute to its significance. Although larger than the existing plant room, the proposed roof extension to the Kingsway building is set back from the north and east elevations and would be only 20cm taller. The proposed refurbishments would improve the appearance of the Kingsway block and the setting of Kodak House. As such, the proposed development is considered to preserve the significance of the adjacent listed building.

8.26 The Connaught Rooms and Freemasons’ Hall are located to the north of the CityLit building, between Great Queen Street and Wild Court. Both buildings shape the character and architecture of Great Queen Street. The Freemasons Hall is a prominent steel frame construction faced with Portland stone. The Hall fits into an irregular polygonal site and was built as a memorial to Freemasons killed in World War I. It dominates the view eastwards along Long Acre and is Grade II\* listed for its architectural and historic interest, as well as its group value with the Connaught Rooms.

8.27 The Connaught Rooms are designated Grade II\* for the following reasons:

- Architectural: for the façade of the former Freemasons' Tavern, a good example of a mid-C19 Italianate commercial frontage, and for the surviving section of Cockerell's elaborate Freemasons' Hall with figures by a notable sculptor.
- Interiors: a unique ensemble of spaces, comprising elements of the 1774 Tavern, a series of ornate rooms dating from 1863-64 and 1905-10, most notably the Great Hall, and a virtually complete suite of 1933-36 interiors.
- Historic: the successor of the original Freemasons' Tavern, the site of Britain's first Grand Lodge, and for the numerous events that took place there including the founding of the Anti-Slavery Society and the Football Association.
- Group value: with the adjoining Masonic Hall, listed Grade II\*.

8.28 As with the Kingsway block, the proposed alterations and refurbishments to the tower are considered to improve the setting of the Grade II\* listed buildings and preserve their architectural and historic significance.

8.29 Bruce House is located to the south west of the site and is a 5 storey red brick building (with basement and mansard) fronting Kemble Street and Kean Street

in the London Borough of Westminster. The building is constructed in the Arts and Crafts style, and was originally a charitable lodging house incorporating a former dispensary. The building's historic and architectural interest are considered to contribute to its significance. Space House is visible in the setting of Bruce House when viewing eastwards along Kemble Street. Although both roof extensions would be visible in this view, they are not considered to impact the setting of the listed building given the limited increase in height, nor the historic or architectural significance of the building.

#### London View Management Framework

- 8.30 The site is located within the London Views Management Framework area, which are grouped into four categories: London Panoramas, River Prospects, Townscape Views and Linear Views. Where a proposed development would affect one or more view, the framework requires an applicant to include a description of each view and provide a justification of visual change. The view relevant to this development is View 16A, River Prospect: The South Bank.
- 8.31 Presently, only the tower roof is visible in LVMF View 16A; this includes its untidy array of rooftop plant structures and services, which detract from the view from the South Bank of the Thames. The view is dominated by Somerset House and views of the riverfront; the area behind Somerset House has been infilled in part by modern development, though its dome remains an articulated feature of the skyline.
- 8.32 The applicant has analysed three viewpoints as one moves westwards along South bank, to determine the impact of the proposed development and its relationship with Somerset House. In the eastern and westernmost perspectives, the proposed tower extension would remain clear of the central dome of Somerset House, and would abut the east side of the dome in views from the central perspective. However, the proposed development would remove the unsightly plant which is visible in these long views and replace them with the increased massing of the proposed roof extension. The new extension would provide a much cleaner profile and is considered an improvement on the existing situation.

#### Proposals and assessment of impact on significance

##### *Tower roof extension*

- 8.33 The proposals seek to add two additional floors to the tower. The two storey extension to the tower comprises a single 'facsimile' floor with detailing and materiality to match the existing floors below and a single set back floor at level 17 to be detailed to be similar in appearance to the originally proposed glazed

pavilion. The new plant room would be located centrally within the new 17<sup>th</sup> floor, and would project approximately 400mm higher than the outer ring.

8.34 The new setback floor to Level 17 would be constructed of glazed curtain walling with an oversailing concrete roof, to match Seifert's original intent. Level 17 will also provide a small terraced area to be used as ancillary amenity space for the office tenants within the tower.

8.35 Since the submission of the applications the applicant has worked with the Council's design officers to develop the design detail of the new extension to the tower to give the termination to the building greater design strength. The key changes to the Tower extension are:

- Lowering the height of the setback floor (level 17) by 400mm to reduce the proposal's impact in long views and adjust the proportions between new and old. The plant enclosure which sits in the circular core of the 17th floor will remain at the previous height but will not be highly visible in long views due to the set back from the main roofline.
- Thickening the roof 'cap' and increasing the projection of the roof overhang to define the building termination. The detailing and proportion of the roof edge reference the existing roof cap and other Seifert & Partners built projects.
- Further detail added to the new window mullions on the setback floor which draw reference from the geometries of the listed building fabric below. The mullions will be aluminium in a colour matched to the existing aluminium windows.
- The proposed balustrade at level 17 has been further setback by 350mm and the material changed to steel metal rods with a top flat bar in a PPC finish to match the aluminium framing of the windows
- The existing concrete banding to the top of the tower is now proposed to be retained and re-used. Despite initially proposing to demolish this element, the applicant has consulted with the original structural engineers, Pell Frischmann and a temporary works engineer, who have confirmed that the concrete can be carefully removed, retained and reinstated, and have prepared a draft method statement. A full detailed method statement of these works shall be secured by condition.

8.36 The proposal to remove the existing roof level clutter which is visible in many long views including Lincoln's Inn Fields to the east and South Bank to the south is welcomed. At present, the accumulation of plant at roof level detracts from the significance of the listed building and the consolidation of the plant within a new enclosure would help to partially reinstate the building's originally designed simplicity. The new 17<sup>th</sup> floor would be largely glazed with a new

concrete cap in reference to the original designs of Seifert which is considered an appropriate and sympathetic extension to the listed building. The 16<sup>th</sup> floor would be a facsimile extension, retaining the proportions, design and materials of the original floors below. Following further investigation by the applicant, it has been confirmed that the existing decorative cornice that tops the external concrete grid, an important element of the design, can be retained. It would be cut away from the existing slab, hoisted up and reinstated as part of the new 16<sup>th</sup> floor, avoiding a harmful loss of historic fabric. A full method statement of this procedure would be secured by condition to be approved by the Council prior to the works commencing (LB condition 5). Detailed drawings of the new glazing and mullions at 17<sup>th</sup> floor level and the new facsimile 16<sup>th</sup> floor detailing would also be secured by condition (LB condition 3).

- 8.37 Following the revisions to the design of the roof extension and the method of construction, the Council's Conservation Officer does not consider that the overall significance of the tower would be unduly compromised by the works proposed.

*Kingsway roof extension*

- 8.38 The single storey extension to the Kingsway block seeks to reference the form and materials of the existing mosaic clad lift overrun on the Kingsway roof. The massing and form of the extension is of a lozenge shape, in keeping with the subtle curved form of the lift overrun. The new plant will be sunk into the envelope to consolidate the roofline in local and longer views. Since submission, the applicant has also worked to develop the design detail of the new extension to the Kingsway building, with changes including:

- Lowering the height of the extension by 400mm to reduce the proposal's impact in long views and adjust the proportions between new and old. The plant enclosure and lift overruns will be contained within this revised envelope.
- Reducing the footprint of the extension to the Southern end by 7.5m to reduce its impact in the views from Kemble and Wild Street where the proposal is more visible. This reduces the internal floor area by 72sqm.
- Changes to the proposed glazing including the addition of a curved window which wraps around the south and east elevations.
- The proposed balustrade material was changed from glass to steel metal rods with a top flat bar in a PPC finish to match the window frames.

- 8.39 Although the existing mosaic-clad lift overrun is not described as a significant element in the listing description, it is considered an attractive feature and the Council welcomes the proposed extension's reference to the structure in its



form, design and materials. The detailed design and materials would also ensure that the new extension would read as a modern addition to the existing building. The extension has been reduced in size so that it reads as a subordinate addition that would not be highly visible in longer views from the south. From the north, the impact of the increased massing would not be dissimilar to the existing situation. Overall, the proposed extension is considered a sympathetic extension which would have limited impact on the building's architectural significance.

#### *Ground floor alterations*

- 8.40 Throughout the ground floor to both the Tower and Kingsway buildings, floor to soffit height slim line glazing would be introduced to reactivate the ground floor frontages. These ground floor glazed interventions would replace the existing modern interventions which are not considered to be sympathetic and are described as detracting from the building's significance in the listing description. The existing entrance to 1 Kemble street will remain in its existing location, and the existing glazing will be replaced with the proposed glazing which will sit behind the sculptural 'Y' columns; reinforcing the pilotis as standalone features.
- 8.41 The existing frontages and entrance lobbies have been heavily altered following major refurbishments in 1996 and 2003. The proposed alterations would replace these harmful interventions with high quality slimline glazing which will provide a sense of activation and improve the appearance of the ground floor frontages. The design of the Kingsway retail frontage was revised to improve the proportions of the double height shopfronts and to introduce a horizontal band similar to that seen in an original artistic render of the development (although not eventually built out).

#### *Kingsway Office Entrance*

- 8.42 The proposals include the relocation of the Kingsway entrance from the current location in the centre of the block, back to its original location to the north end of the building. The original northern entrance has been much altered over the years, including the demolition of the original sculptural stair which matched the one seen to the South of Kingsway. It is proposed to replace the existing modern stainless steel stair with a new stair to match the location and sculptural form of the original. The existing steel stair is not in keeping with the architectural character of the building and its removal and replacement with a new stair to match the original is considered to be a significant heritage gain, reinstating plan form, layout and detailing. Detailed drawings of the proposed staircase would be secured by condition (LB Condition 3).

### *Petrol station canopy*

- 8.43 Once a petrol filling station, the area beneath the canopy is an underused part of the site following the previous removal of the petrol station. The proposals seek to remove the existing unsympathetic fencing surrounding this area and introduce faceted glazing beneath the canopy to create a new flexible retail demise and reinvigorate this part of the site. The faceted glass will mimic the profile of the canopy edge and return back towards the tower just clear of the sculptural Y columns. The canopy glazing would be set back by 1500mm from the front face of the canopy with two frameless glass doors to either side of the enclosure. Details of the proposed glazing and the join between the glazing and historic fabric would be secured by condition (LB Condition 3). The proposed glazing would be easily reversible and would read as a minimal, lightweight, modern addition to the host building.

### *Facades and fenestration*

- 8.44 The façades to both the Tower and Kingsway buildings are the key defining feature of the brutalist buildings. The listing makes particular reference to this within its reasons for designation. The structural precast concrete façade elements of the tower create a distinctive pattern that repeats up all 15 storeys. The precast elements are made up of a series of cruciform elements, sculptural in form with a generous depth to create a dynamic façade when viewed from different positions. The ground floor of the building is anchored by a series of 'Y' shaped columns to create a ring of pilotis to the base of the tower.
- 8.45 In contrast, the rectilinear block form of the Kingsway building has proportions that reflect more of the surrounding Edwardian buildings. At ground level, as per the tower, the Kingsway block is adorned with sculptural columns to the north and south, both of which are now disrupted by modern glazed interventions.
- 8.46 Given the façade is now over 50 years old, it is beginning to show signs of age, particularly within the precast elements which require cleaning and restoration. The existing secondary internal glazing is built using 1960's technology and does not perform up to the required standard for a modern office building. The proposals seek to replace all existing fenestration to the tower and Kingsway blocks, replacing the single glazed units with double glazing. The proposed units will match the pattern and proportion of the existing fenestration, however the windows would comprise an opening fan light, two fixed panes, an extruded aluminium transom to match existing, and a fixed pane below with a SEFAR mesh interlayer – to replace the solid fibreboard material within the existing configuration.

8.47 The window frame will be of a silver anodised finish to match the existing window framing. The colouring of the lower pane will be achieved by either screen printing the mesh in a RAL to match or using a grey body tint glass on the external pane. Site sampling will be undertaken to ascertain which of these two approaches will achieve the closest match and full details and samples would be secured by condition to be approved by the Council prior to installation (LB condition 3).

8.48 Although the proposed alterations would introduce modern materials and double glazing, the works would maintain the existing partnership of colour scheme and fenestration which is of primary importance to the building's significance. Whilst not exactly replicating current materials it is felt that the replication of detail will leave the significance of the building unharmed since the significance is in the innovative use of precast concrete rather than the use of other contemporary materials.

#### *Replacement southern stair enclosure*

8.49 In its current condition, the Kingsway staircase to the south end of the block is enclosed behind a harmful aluminium glazed screen that awkwardly cuts through the paired composition of sculptural cross columns. Seifert's original intention was to allow the Kingsway block to appear as if it was floating, with the composition consisting of the pair of columns with the central mosaic clad staircase in the centre which wraps up into the soffit.

8.50 In order to improve the visual appearance of the current enclosure the glass within the existing framework would be re-glazed with modern clear glass. Although the existing situation is considered to cause harm to the significance of the building and the Council's preference would be to reinstate the free-standing staircase, given the open access to first floor and basement level afforded by the staircase and the current anti-social behaviour in this location, it is acknowledged that it may not be feasible to reinstate the original open staircase in this location. The replacement of the existing unattractive opaque glazing with new high quality slimline glazing is considered to represent an improvement on the existing situation, and as such, is considered acceptable. Details of the replacement glazing would be secured by condition (LB Condition 3).

#### *Internal alterations*

8.51 The proposal seeks to revitalise the existing office floors to provide improved open plan office space. The false ceilings and dry lining partitions would be removed to expose the existing structural coffered slab. The existing slab structure is made up of a series of radial precast panels which would allow for

the services to sit within a radial configuration within the coffers. The existing ventilation ducts would be infilled and electrical and data services installed into the existing slab along the primary beams to the perimeter edge through the existing ring beams to provide services along both the outer and inner edges of the plan.

- 8.52 At the west end of the building, there are three original vehicular entrance and exit ramps leading to a two-storey underground car park. The car park has been heavily altered and is of no significance, but the ramps and the associated access stair are of moderate significance as part of the original plan and evidential use of the site. The proposals include the removal of two of the three original car park ramps leading from the west side of the site to the basement levels. The lower basement level would maintain its ramp to provide access to the proposed cycle parking. The ramp presently most visible from the street would be retained, and while the loss of the two additional concealed ramps would cause harm to original fabric, they are utilitarian in nature and their use has been made redundant (basement access via one of the ramps is presently blocked with a modern partition); therefore, the harm would be less than substantial.

#### Public realm and Landscaping

- 8.53 The larger public space consists of the area between the tower and the Kingsway building, opening to the north and south. The majority of the surface is currently used for servicing, UKPN, parking and refuse with predominantly blank ground floor frontages resulting in an uninviting space with a lack of animation. Despite this, it is noted that there is a high level of pedestrian movement around and through the site. The arterial route from Kemble Street through to Covent Garden draws a significant amount of footfall from the south west of the site.
- 8.54 The ground floor area around the tower was originally designed with the principal purpose of serving cars, with its own on-site petrol station and underground car park. As a result, with the exception of two architecturally significant ventilation structures, there is little in the public realm to enhance the pedestrian experience or encourage use of this space. It is therefore considered a positive that the site is to be re-landscaped, with inspiration being taken from the historic photographs that exist of the original landscaping scheme, and the sculptural geometry of the buildings. The proposals would create a new concentric diagrid of hard landscaping with elements of soft landscaping. The materiality of the hard landscaping draws from the brutalist architecture, offering differing tones of grey picking up on the previous hexagonal landscaping that once adorned the ground floor plane.

8.55 By removing the gates and railings and creating a much more defined public realm in and around both the tower and Kingsway block, the highly sculptural concrete legs would be emphasised and celebrated, to the benefit of the public experience. Areas such as the UKPN substation which cannot be animated will be improved by either recladding in a more sympathetic material or a green wall. It is the applicant's preference to install a green wall but a feasibility study has not yet been completed to determine if a green wall would survive in this location. Full details of the final treatment of this wall would be secured by condition (LB condition 3). Full details of the proposed landscaping works would be secured by condition (condition 18).

#### Impact on significance conclusion

8.56 The proposed extensions, repairs and refurbishment of the listed building are considered sensitive alterations which would improve the external appearance of the buildings and ensure the ongoing optimal viable use of the site as offices. The proposed tower extension would utilise a facsimile approach and retain the Modernist symmetry of the tower's original design and its relationship with the Kingsway building. The unattractive rooftop plant which detracts from the significance of the building and blights a number of local and longer views would be removed and relocated or concealed within the design of the new roof extension, which overall, would enhance the appearance of the building. The proposed Kingsway extension would also remain subservient and maintain the established proportions between the two buildings which are an important element of their architectural significance. Although the extension would result in the loss of some original fabric and alter the appearance of the building, it would cause less than substantial harm to the significance of the building overall.

8.57 The new ground floor glazing to the southern staircase would be an improvement on the existing situation and the infill below the tower canopy would be a sensitive addition which would not interfere with the original sculptural pilotis and would clearly read as a modern intervention. The ground floor alterations across the site would, on the whole, remove modern harmful interventions and replace them with high quality, slimline glazing and reinstate original detailing and features.

8.58 The proposed window replacements would result in less than substantial harm to the significance of the building through the loss of original fabric; however, the original composition of the mullions and transoms would be retained which are considered of primary importance to the significance rather than the materials themselves. The removal of two of the three basement car park ramps would also result in a harmful loss of historic fabric; however, this harm

is considered less than substantial given the most visible ramp would be retained providing a reminder of their original function.

8.59 Overall, the proposals are considered to preserve the special architectural and historic interest of the listed building, which resides largely in the principal external elevations of both buildings. The interiors of the building were originally designed to be flexible for the sake of commercial use and have since been extensively refurbished; therefore there is little of significance internally. The overall harm caused by the loss of original fabric is considered to be less than substantial.

8.60 Paragraph 196 of the NPPF states that where a development proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimal viable use. In this instance, the proposals are considered to deliver a number of benefits including refurbishing and enhancing the appearance of the listed building and its setting, improvements to the public realm surrounding the buildings, and securing the optimum viable use as offices, which is of principal importance to the building's architectural and historic significance.

8.61 Affording the less than substantial harm considerable importance and weight, Officers are nevertheless of the view that the public benefits of the scheme, being essentially to secure the building's optimum viable use and sympathetic improvements both to its own appearance, the surrounding public realm, and the settings of other heritage assets, are sufficiently substantial to outweigh the less than substantial harm caused. As such, the proposed development is considered acceptable, in accordance with policies D1 and D2 of the Camden Local Plan and paragraph 196 of the NPPF.

#### Archaeological impact

8.62 The proposals would be unlikely to impact heritage assets of archaeological interest given the proposals do not involve any below ground excavations.

## **9 Impact on neighbouring amenity**

9.1 The considerations on the impact on the amenity of the occupiers of neighbouring properties are as follows:

- Policy review
- Daylight and sunlight
- Outlook/Overlooking
- Noise and disturbance

### Policy review

- 9.2 Camden Local Plan policies A1, A2, A3, A4 and CPG (Amenity) are relevant with regards to the impact on the amenity of residential properties in the area. Any impact from construction works is dealt with in the transport section.

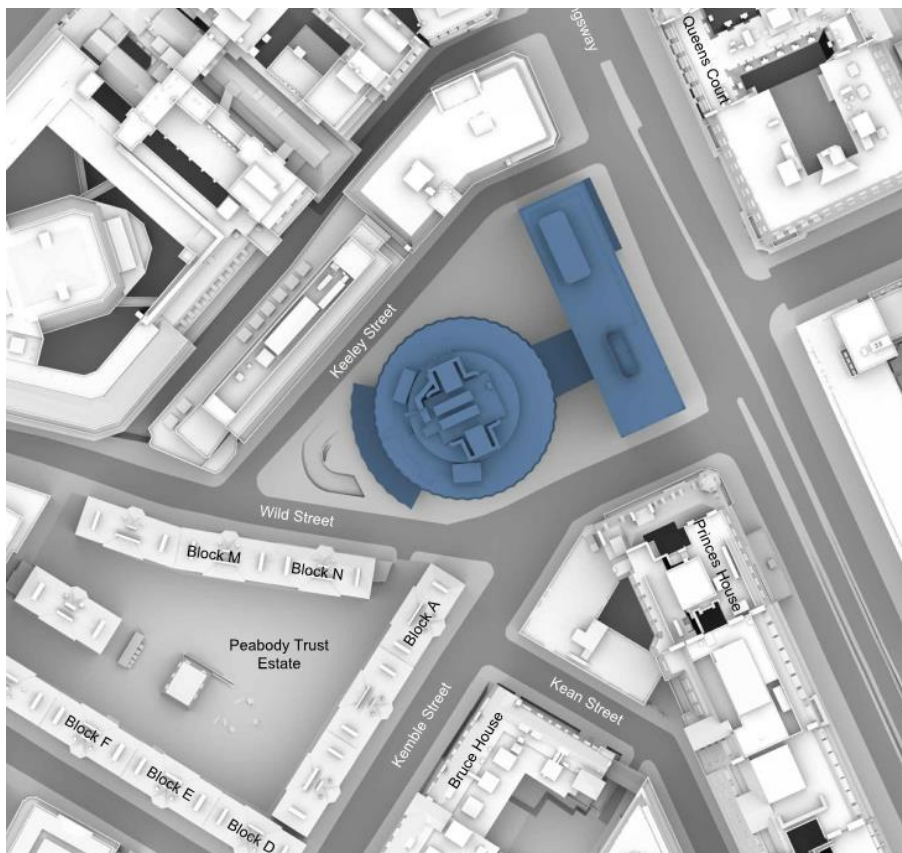
### Daylight and sunlight

- 9.3 A Daylight and Sunlight Report has been submitted as part of this application prepared by Point 2 Surveyors. The report has tested the impact of the development on the daylight and sunlight to neighbouring windows in accordance with the BRE report 'Site layout planning for daylight and sunlight: A guide to good practice', most commonly known as "the BRE guidelines".
- 9.4 The VSC (Vertical Sky Component) test is a measure of the direct skylight reaching a point from an overcast sky. The BRE guidelines state that if the VSC is greater than 27%, enough daylight should be reaching the existing window. Any reduction below this level should be kept to a minimum. Windows to some existing rooms may already fail to achieve this target under existing conditions (because of the dense urban environment). In these circumstances a reduction to the existing level of daylight to no less than 80% of its former value will be unlikely to result in a noticeable reduction in daylight.
- 9.5 The No-Sky Line (NSL) is a measure of the distribution of daylight within a room. It maps out the region within a room where light can penetrate directly from the sky, and therefore accounts for the size of and number of windows by simple geometry. The BRE suggest that the area of the working plane within a room that can receive direct skylight should not be reduced to less than 0.8 times its former value (i.e. the proportional reduction in area should not be greater than 20%).
- 9.6 Average Daylight Factor (ADF) is a measure of the overall amount of diffuse daylight within a room. It is the average of the daylight factors across the working plane within a room. This equates to the ratio of the average illuminance across the working plane, to the illuminance due to an unobstructed sky. In addition to accounting for external obstructions, the ADF accounts for the number of windows and their size in relation to the size of the room, the window transmittance and the reflectance of the internal walls, floor and ceiling. BRE guidelines for acceptable ADF values depend on the room use and are 1.0% for a bedroom, 1.5% for a living room and 2.0% for a kitchen.
- 9.7 Sunlight was assessed using the Annual Probable Sunlight Hours (APSH) test. 'Probable sunlight hours' is defined as "the long term average of the total number of hours during a year in which direct sunlight reaches the

unobstructed ground (when clouds are taken into account)". The BRE sunlight tests should be applied to all main living rooms which have a window facing within 90 degrees of due south.

- 9.8 The BRE guidelines are intended for use for rooms in adjoining dwellings. They may also be applied to any existing non-domestic buildings where the occupants have a reasonable expectation of daylight, which could include schools, hospitals, hotels and offices. For dwellings, it states that living rooms, dining rooms and kitchens should be assessed. Bedrooms should also be checked, although it states that they are less important. Other rooms, such as bathrooms, toilets, storerooms, circulation areas and garages need not be assessed.
- 9.9 Properties on the following streets where analysed for the impact of the proposal (see figure 4 for location):

- Peabody Trust Estate: Blocks N, M, A, D, E, F
- Bruce House
- Princes House
- Queens Court



*Figure 4 – Labelled properties assessed in Daylight and Sunlight Report.*



### Peabody Trust Estate

- 9.10 All windows and associated rooms would experience fully BRE compliant alterations in VSC and NSL. The greatest changes in VSC identified were 2.06% in Block N, 2.31% in Block M, 0.45% in Block A, 1.66% in Block D, 1.37% in Block E and 1.41% in Block F. BRE Guidance states that reductions of up to 20% will be unnoticeable.
- 9.11 All site facing rooms which have a window orientated within 90 degrees due south experience fully BRE compliant changes in Annual Probable Sunlight Hours (APSH).

### Bruce House

- 9.12 All windows and associated rooms experience fully BRE compliant alterations in VSC and NSL; the greatest change in VSC being 1.97%. All site facing rooms which have a window orientated within 90 degrees due south experience fully BRE compliant changes in Annual Probable Sunlight Hours (APSH).

### Princes House

- 9.13 All windows and associated rooms experience fully BRE compliant alterations in VSC and NSL; the greatest change in VSC being 5.69%. All site facing rooms which have a window orientated within 90 degrees due south experience fully BRE compliant changes in Annual Probable Sunlight Hours (APSH).

### Queens Court

- 9.14 All windows and associated rooms experience fully BRE compliant alterations in VSC and NSL; the greatest change in VSC being 1.95%. All site facing rooms which have a window orientated within 90 degrees due south experience fully BRE compliant changes in Annual Probable Sunlight Hours (APSH).

### Daylight and Sunlight Conclusion

- 9.15 The daylight and sunlight assessment demonstrated that of all of the surrounding residential windows tested, there will be no noticeable losses in daylight or sunlight. As such, the proposals are considered acceptable in this regard.

### Outlook/Overlooking

- 9.16 As discussed above, the nearest residential properties which could be impacted by the proposed development are the Peabody Trust Estate, Bruce House, Princes House, and Queens Court. Given the proximity of these dwellings to the tower, and the existing height of the tower at 17 storeys, there would be very limited impact on the outlook from these properties. The closest properties to the Kingsway block are within Princes House. As the proposals include a single additional storey to this building which would be significantly set back from the southern elevation, the outlook from Princes House would not be harmed.
- 9.17 The site would remain within office use from first floor level upwards, and as such, opportunities for overlooking into residential windows would not materially change from the existing situation. New flexible retail and restaurant use would be introduced at ground floor level with new ground floor glazed shopfronts fronting Kingsway and a new café/bar seating area beneath the former petrol station canopy. The new shopfronts would not be facing any residential properties and would not result in any harmful overlooking. The new seating area beneath the western canopy would be located directly opposite Block N of the Peabody Trust Estate; however, with a minimum distance of 20m between them, this is not considered to result in harmful overlooking of the residential windows. CPG (Amenity) recommends a minimum distance of 18m between directly overlooking neighbouring windows to prevent loss of privacy for occupants.

### Noise and disturbance

- 9.18 The proposals include the installation of new fixed plant at roof level of both buildings which could be in operation continuously. The two plant areas would be enclosed by screening. The nearest residential noise-sensitive premises are located on Keeley Street, approximately 50m away from the tower, and on the opposite side of Kingsway, approximately 38m from the Kingsway block.
- 9.19 An environmental noise survey report has been carried out to determine the existing background noise levels in the area and to set appropriate plant noise limits in line with policy A4. The dominant noise source was noted to be road traffic from the surrounding road network and nearby building services plant.
- 9.20 The Council's Environmental Health Officer has reviewed the submitted report, and confirmed that following corrections for screening and distance attenuation, Ratings Levels during normal operating conditions (24/7) from roof top plant on the Kingsway block impacting the nearest noise sensitive receptor complies with the Councils "Green Effect Level" i.e. 10dB below background noise levels.

The proposed plant on the tower would be an improvement on the existing situation, and rating levels would be more than 10dBA below background noise levels. This result was repeated at both the nearest Noise Sensitive Receptor locations when Emergency Plant is operating. Consequently, the Environmental Health Officer does not object to the proposed development subject to the Council's standard noise conditions regarding noise levels and installation of anti-vibration measures (conditions 8 & 9).

9.21 Hours of use for the new event space and retail/restaurant uses would be controlled by condition (condition 20) and would be restricted to the following hours:

- The B1 event space: 07:00am – 01:00am Mondays to Saturdays and 08:00am – 10:30pm on Sundays and Bank Holidays.
- 43 – 59 Kingsway A1/A3: 06:30am – 12:00am seven days a week.
- 1 Kemble Street A1/A3: 08:00 – 12:00am Thursdays to Saturdays and 08:00am – 11:00pm on Sundays to Wednesdays and Bank Holidays.

### Conclusion

9.22 The proposal is considered not to have a detrimental impact on the amenity of neighbouring residential properties in terms of loss of light, privacy, or noise disturbance subject to the conditions listed above, and would be in accordance with policies A1 and A4.

## **10 Land Contamination**

10.1 The Council's Environmental Health Officer has identified the following past industrial uses of plausible concern within 100 metres of the site:

- Numerous unspecified industrial sites, electrical sub-station, electrical company, printing works and tobacco factory.
- The application site is within a 250m radius of the former landfill site at Portugal St (Lincoln's Inn Fields).

10.2 According to the Council's contaminated land risk characterisation, land on which the above processes/activities were carried out is considered to present a moderate risk of contamination. As the proposed development includes demolition works and decommissioning buried fuel tanks associated with the former petrol station, the potential risks from land contamination require further investigation.

- 10.3 Furthermore, given the application buildings were constructed in the 1960's it is possible asbestos containing materials (ACMs) have been used in construction and/or maintenance.
- 10.4 A Geotechnical & Geo-Environmental Desk Study has been submitted which the Environmental Health Officer has confirmed is acceptable. Should planning permission be granted, conditions will secure the submission of an asbestos survey and for construction to be completed in accordance with the recommendations of the Geotechnical & Geo-Environmental Desk Study (conditions 10 & 11).

## **11 Air quality**

- 11.1 Camden Local Plan policy CC4 is relevant with regards to air quality. The site is in an area of very poor air quality, i.e. expected to exceed the long term objective for NO<sub>x</sub> throughout the site, with parts (Kingsway-facing façade) expected to exceed the short term objective. An Air Quality Assessment (AQA) has been submitted as part of this application prepared by Hilson Moran.
- 11.2 With regards to the impact of local air quality on building occupants, a quantitative assessment was undertaken which demonstrated that no exceedances of the short term NO<sub>2</sub> objective are predicted, and as such, no mitigation is proposed. However, quantitative assessment *with* dispersion modelling was not undertaken as required by policy CC4, and the Council's Sustainability Officer had concerns regarding the use of forward projections in the AQA modelling which Camden does not accept. The applicant has agreed to conduct a detailed baseline air quality traffic study, which will be secured by condition (condition 16).
- 11.3 In terms of the impact of the development on local air quality during operation (including air quality neutral assessment), the development will be car free and will have significantly reduced on-site car parking provision. The scheme is assessed to meet air quality neutrality for transport and building emissions, and includes ultra-low NO<sub>x</sub> (<40mg/kWh) gas boilers.
- 11.4 With regard to the impact of the development on local air quality during construction, the overall risk level is assessed as 'low', therefore, the low-risk measures from the Mayor's Control of Dust and Emissions and guidance would be required to be incorporated into the Construction Management Plan, which would be secured by S106 Legal Agreement if planning permission is granted. For low risk development, no real-time dust monitoring is required. All non-road mobile machinery (NRMM) would comply with the emission standards specified in the Mayor of London's Control of Dust and Emissions during Construction and Demolition SPG. This would be secured by condition (Condition 17).

## **12 Sustainable design and construction**

### Policy review

12.1 Pursuant to London Plan policies 5.2, 5.3, 5.6, 5.7, 5.9, 5.10, 5.11, 5.12, 5.13, 5.14, 5.15 and 5.17 and Camden Local Plan policies CC1, CC2, CC3, CC4 and CC5, all developments in Camden are required to make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

### Energy

12.2 Applicants are expected to submit an energy statement showing how the development will meet the following policy requirements:

- Follow the hierarchy of energy efficiency, de-centralised energy and renewable energy technologies set out in the London Plan (2011) Chapter 5 (particularly Policy 5.2) to secure the maximum feasible CO<sub>2</sub> reduction beyond Part L 2013. GLA guidance on preparing energy assessments and the 'Energy Efficiency and Adaptation' CPG should be followed. In particular, improvements should be sought on the minimum building fabric targets set in Part L of the building regulations.
- CC1 requires all developments to achieve a 20% reduction in CO<sub>2</sub> emissions through renewable technologies (the 3<sup>rd</sup> stage of the energy hierarchy) wherever feasible, and this should be demonstrated through the energy statement.

12.3 An Energy statement has been submitted which demonstrates that the development would make an overall reduction in CO<sub>2</sub> emissions of 58.3% by utilising the following measures:

- Improved U-values and g-Values
- Improved air permeability
- Improved ventilation performance
- Improved lighting and lighting controls
- Improved system efficiencies

12.4 However, savings from renewables (the third stage in the energy hierarchy) would only equate to 0.13% and involves the installation of air source heat pumps (ASHP) to serve the new ground floor flexible retail units. Although it is acknowledged that the listed status of the building will impact the extent of intervention possible, the Council would expect that more could be done to maximise renewable technologies. Given this shortfall, a condition is

recommended to secure a solar PV feasibility assessment with the aim of maximising the provision of solar photovoltaics. Should PV panels prove to be feasible, full details of the PV panels and associated equipment would also be secured by condition (condition 14).

12.5 The CO<sub>2</sub> reductions would be secured in the S106 agreement, with a renewables energy target determined by the solar feasibility study. Energy provisions shall also be secured through the S106 Energy Efficiency and Renewable Energy plan with minimum targets as follows:

- Extensions 36.79% beyond Part L2B 2013
- Existing parts 59.47% beyond Part L 2002

### Sustainability

12.6 Applicants are also expected to submit a sustainability statement, the detail of which should be commensurate with the scale of the development, showing how the development will:

- Implement the sustainable design principles as noted in policy CC2.
- Achieve a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

12.7 The sustainability statement indicates that the development could meet a BREEAM 'Excellent' rating and would meet the following targets:

- Energy 54.2%
- Materials 84.6%
- Water 77.8%

12.8 The development was assessed against BREEAM Refurbishment and fit-out criteria. Following discussions with the Council's Sustainability Officer, it was agreed that requiring the extension areas to achieve a 35% reduction in carbon emissions against a new build target emission rate (TER) is not appropriate when items such as the retained canopy over the retail (which cannot be insulated) are considered. Instead the new extensions areas are compared against a TER calculated in line with the minimum façade and system requirements of Part L2B. The results within the Energy Strategy show that the 35% carbon reduction within the new extension areas is achieved.

12.9 The scheme fails to comply with policy targets for energy; however, the applicant has responded that at the time of pre-assessment, exact predictions of overall energy are difficult to provide. As the design develops and more design/specification details become available, it is the developer's intention to

ensure 60% of Energy section credits will be achieved, and this target will be secured as part of the S106 Energy Efficiency and Renewable Energy Plan.

### **13 Flood risk and drainage**

13.1 Camden Local Plan policy CC3 is relevant with regards to flood risk and drainage. Major development schemes are expected:

- To achieve greenfield run-off rates wherever feasible and as a minimum, 50% reduction in run off rates.
- To include Sustainable Urban Drainage Systems (SuDS), unless demonstrated to be inappropriate.
- To follow the drainage hierarchy in policy 5.13 of the London Plan.
- To constrain run-off volumes to greenfield run-off volumes for the 1 in 100 year 6 hour event plus climate change.

13.2 A Flood Risk Assessment (FRA) has been submitted as part of this application. The site is mostly within an area of very low flood risk (<1 in 1000 year). There is very minor encroachment of low risk (1 in 1000 year) in the south-west and north-east corners. Keeley Street bordering the site to the north is partially at high risk (>1 in 30 year).

13.3 The FRA demonstrates that the proposed development would not exacerbate the existing flood risk level at the site, nor surrounding areas. As the development is mostly refurbishment with roof level extensions and no changes to footprint, there would be no change to the flow exceedance routes on site. Drainage will remain as existing.

13.4 Although greenfield run off rates would not be achievable, the development's proposed SuDS include the installation of an increased capacity attenuation tank of 45m<sup>3</sup> which would accommodate a 50% reduction in run off rates as required by policy.

13.5 The Council's Lead Local Flood Authority (LLFA) Officer has confirmed that the proposed SuDS are acceptable, subject to full details being secured by condition (condition 15).

### **14 Accessibility**

14.1 Policy C6 promotes fair access and seeks to remove the barriers that prevent everyone from accessing facilities and opportunities. It describes that the Council will:

- Expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all;
- Expect facilities to be located in the most accessible parts of the borough;
- Expect spaces, routes and facilities between buildings to be fully accessible;
- Encourage accessible public transport; and
- Secure car parking for disabled people.

14.2 As per the existing situation, level pedestrian access to the building will be retained to all ground floor areas. The Tower office entrance is located from Kemble Street which leads to the Tower reception area. This entrance will be in the same location as the existing condition and will have level access from street level. The reception area leads to the main core that provides access to all office levels and ancillary office spaces in the basement. The core comprises of two staircases and 6 main lifts that serve all the office levels.

14.3 Level access will be provided to the new flexible A1/A3 units at ground floor level of both buildings, from multiple entrance points surrounding both buildings.

14.4 The Kingsway office entrance is located to the north end of the Kingsway building, as per the existing arrangement. Level access will be provided via the north east corner. The main reception lobby serves the upper office floors by three fully-accessible lifts and two stairwells. The basement is also served by one stairwell and one lift as part of the main core.

14.5 The development would also provide one disabled parking space at basement level with step free lift access from the basement to all floors of the buildings.

14.6 As such, the proposed development is considered acceptable in this regards, and would provide inclusive, step-free, wheelchair accessible access to all floors of the building.

## **15 Transport**

15.1 The following transport considerations are covered below:

- Policy review
- The site
- Trip generation
- Travel planning



- External doors
- Car parking
- Cycle parking
- Highway works
- Pedestrian, Cycling and Environmental Improvements in the local area
- Deliveries and servicing
- Managing and mitigating the impacts of construction
- Conclusion

### Policy review

15.2 Camden Local Plan policies A1, T1, T2, T3, T4 and DM1 and the Amenity, Design and Transport CPGs are relevant with regards to transport issues.

### The site

15.3 The site is located in the Central London Area and is easily accessible by public transport (PTAL rating is 6b – the best). Holborn Station (Central Line) is located within a 5 minute walk of the site. Covent Garden and Temple stations are also located within reasonable walking distance of the site. In addition, bus stops serving various routes are located nearby on Kingsway, Aldwych, High Holborn and Strand.

15.4 The site is located adjacent to Kingsway (A4200) which forms part of the Strategic Road Network (SRN). The Council is the highway authority, although Transport for London (TfL) has a duty under the Traffic Management Act 2004 to ensure that development does not have an adverse impact on the SRN. TfL Spatial Planning submitted transport observations on the planning application due to the close proximity of the site to the SRN and the scale of the development proposal (see consultation section, paragraph 4.5).

15.5 Cyclists and pedestrians make up a significant proportion of the traffic in the vicinity of the site, particularly during peak periods. The nearest recognised cycle route to the site is Great Queen Street to the northeast. This forms part of Quietway 1 which links Covent Garden with Kentish Town.

15.6 The site is also conveniently located near various cycle hire docking stations, which are bike hire schemes for short journeys. The nearest docking station is located on Kingsway to the south of the site. Staff and visitors would be able to hire a bicycle for the price of £2 for 24hrs and the bicycle could be returned to any docking station in London.

### Trip generation

15.7 The submitted Transport Assessment (TA) includes details of trip generation analysis for the proposed development. This is based on an acceptable and recognised methodology of using data from comparable developments to identify the net impact of the proposed development when compared to the existing situation.

15.8 The results predict an increase of 2,706 trips to and from the site on a daily basis (over a 12 hour period between 7am and 7pm). Further analysis suggests the proposed development would generate 67 and 196 additional trips in the morning and evening peak hours respectively. The assessment suggests the following modal share:

- 83% by public transport
- 6% motor vehicles including taxis
- 6% cycling
- 5% walking

15.9 The results of the assessment suggest that the proposed development will not have a severe impact on the surrounding transport network. There is some concern that trips by bicycle have a predicted modal share of less than 10%. The predicted modal share of 6% for cycling is much lower than would be expected for a mixed use development in the Central London Area. Likewise, the predicted modal share for walking is lower than expected. However, the applicant has acknowledged that the modal split was derived from the 2011 census and as such may underestimate the cycle and walking mode share that could be achieved. The applicant and Council Transport Officers anticipate that higher modal shares for cycling and walking can be achieved via a travel plan and the implementation of public realm improvements in the local area to make cycling and walking more attractive to staff and visitors. A travel plan would be secured by S106 if planning permission is granted.

### Travel planning

15.10 A travel plan and associated monitoring contribution of £9,618 would be secured as section 106 planning obligations if planning permission were granted. The applicant has acknowledged this requirement in the transport statement submitted in support of the planning application. The Travel Plan would be targeted towards staff. The location of the site in Central London with excellent connections to the public transport network would help to reduce the need to travel by single occupancy private car and would encourage staff to

make walking, cycling and travel by public transport the natural choice for day-to-day trips.

#### External doors adjacent to the public highway

- 15.11 The proposed ground floor plan indicates a number of external doors opening outwards on to the public highway on the Kingsway facade. Although the Council generally resists doors opening on to the public highway, in this instance, the applicant has clarified that the identified doors form part of the fire escape strategy and thus, would only be used in emergencies. The Council's Transport Officer has confirmed that given the outward opening doors would rarely be used, they are acceptable in this instance.

#### Car parking

- 15.12 The site is located within the Holborn & Covent Garden controlled parking zone (CPC CA-C), which operates on Monday to Saturday between 0830 and 1830 hours for pay to park bays and single yellow lines, whilst all resident permit bays are controlled 24 hours a day, 7 days a week.
- 15.13 The site currently benefits from 48 car parking spaces (15 at ground level and 33 at upper basement level). The proposal would result in the loss of 44 of these car parking spaces. This is supported by Policy T2. The 4 car parking spaces to be retained will include 1 fully accessible parking space for staff or visitors with a recognised disability.
- 15.14 In addition, 2 of the parking spaces will have access to electric vehicle charging points. This is welcomed as it will future proof the site for the parking of low emission vehicles. The provision and ongoing retention of the electric vehicle charging points should be secured by condition (condition 7).
- 15.15 The proposed development would essentially be car-free. This is acceptable from a general parking point of view. It is noted that the site is easily accessible by public transport and there may not be an essential need for staff or visitors to travel to and from the site by private motor vehicle. However, staff and visitors in possession of a blue badge would be able to park on the public highway in the general vicinity of the site.
- 15.16 A car-free planning obligation would be secured via a legal agreement if planning permission were granted.

### Cycle parking

- 15.17 The proposal would provide 429 covered, secure and fully enclosed cycle parking spaces for staff at upper basement level. The cycle parking facilities would be located within a single cycle store provided with separate storage for each land use for added security. The cycle parking facilities have been designed in accordance with CPG Transport. The proposed level of provision slightly exceeds the minimum requirement of the Draft London Plan and is therefore in accordance with Local Plan Policy T1. The cycle parking facilities will be easily accessible via the existing vehicle ramp. An uphill cycle lane will be marked to provide segregation from motor vehicles. The provision and ongoing retention of these cycle parking facilities would be secured by condition if planning permission is granted (conditions 5 & 6).
- 15.18 The proposal would provide 74 secure cycle parking spaces for visitors at ground level. This would consist of 37 'Sheffield' stands designed in accordance with CPG Transport. The proposed level of provision slightly exceeds the minimum requirement of the Current London Plan and meets the minimum requirement of the Draft London Plan. As such, the proposals for short stay cycle parking facilities for visitors is in accordance with Local Plan Policy T1.
- 15.19 It should be noted that 20 of the short stay cycle parking facilities for visitors would be located on the public highway adjacent to the Kingsway frontage. These cycle parking stands would be installed by the Council. A cycle parking contribution would be secured via a legal agreement if planning permission is granted (included within the highway works contribution).

### Highway works

- 15.20 The footways directly adjacent to the site are likely to sustain significant damage because of the proposed construction works. The Council would need to undertake remedial works to repair any such damage following completion of the proposed development.
- 15.21 A number of existing vehicle crossovers adjacent to the site would become redundant as a result of the proposals. The Council would need to remove these redundant vehicle crossovers and replace them as part of the adjacent footways.
- 15.22 The Council would also need to install 20 cycle parking stands on the footway adjacent to the Kingsway façade of the property. These would provide short stay cycle parking facilities for visitors.

15.23 A highways contribution of £88,259 would need to be secured as a section 106 planning obligation if planning permission is granted. This would allow the Council to:

- Removal of all redundant vehicle crossovers directly adjacent to the site on Kemble Street and Wild Street.
- Repaving the footways directly adjacent to the site on Keeley Street, Kemble Street, Kingsway and Wild Street. This includes constructing new sections of footway where redundant vehicle crossovers are to be removed directly adjacent to the site on Kemble Street and Wild Street.
- Amendments to existing traffic management orders where necessary
- Installation of 20 cycle parking stands (40 spaces for visitors) on the footway directly adjacent to the site (e.g. adjacent to the Kingsway elevation).
- Any other works the Council acting reasonably considers necessary as a direct result of the Development.

15.24 The highway works would be implemented by the Council's highways contractor on completion of the development.

#### Pedestrian, cycling and environmental improvements

15.25 The proposed development will generate a significant increase to and from the site on a daily basis. The Council's transport policies are geared towards encouraging and promoting active travel (i.e. walking and cycling). The Council would therefore seek to secure a Pedestrian, Cycling and Environmental (PC&E) improvements contribution of £79,885 as a section 106 planning obligation if planning permission is granted. This figure has been calculated by the Council's Transport and Highways Officers in negotiation with the applicant's Transport consultant and would be used by the Council to transform the public realm in the general vicinity of the site for the benefit of cyclists and pedestrians. These improvements would complement the public realm improvements to be delivered within the site boundary and would include:

- creation of a pocket park at the south-western end of Keeley Street (between the junction with Wild Street and the vehicle crossover leading to the upper basement level)
- construction of a kerb buildout at the junction of Wild Street with Kemble Street to reduce the size of the junction.

15.26 The PC&E improvement works would be implemented by the Council's highways contractor on completion of the development.

### Deliveries and other servicing activities

15.27 All deliveries, refuse and recycling collections and other servicing activity would be accommodated from 3 loading bays within the site. Vehicles would access the site via an existing vehicle crossover on Keeley Street. The applicant has predicted that the development would generate 86 vehicles per day. This figure is higher than expected and raises concern that deliveries, refuse and recycling collections and other servicing could have a severe impact on the public highway if not sufficiently managed. In response to the Transport Officer's concerns, the applicant has noted that it is not yet known what the likely tenant make up for the B1 floorspace would be which makes it more difficult to forecast the potential effectiveness of measures to reduce servicing trips. Worst case figures have also been used for the A1/A3 use, allowing for delivery of fresh produce from multiple sources, and as such could likely be reduced following discussions with occupiers.

15.28 As such, the Council's Transport Officer is satisfied that servicing vehicle numbers could be reduced, which should be set out in a servicing management plan secured as a section 106 planning obligation if planning permission were granted. The applicant has acknowledged this requirement in the transport statement submitted in support of the planning application.

### Managing and mitigating the impacts of construction

15.29 Construction management plans (CMPs) are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A draft CMP using the Council's CMP pro-forma has been submitted in support of the planning application which provides little in the way of useful information and lacks detail throughout the document, although it is acknowledged that a principal contractor has yet to be appointed. In response to the Council's Transport Officer's comments, and TfL's comments on the draft CMP, the applicant has prepared an Outline Construction Logistics Plan in line with TfL guidance (2017) and the Mayor's Healthy Streets Approach.

15.30 The site is located in the Central London Area. This part of the borough suffers from severe traffic congestion during peak periods. The Council's primary concern is public safety but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality, temporary loss of parking, etc.). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway

network in the local area. A more detailed CMP would therefore be secured via a Section 106 planning obligation if planning permission is granted.

15.31 The Council would expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. The contractor would need to register the works with the Considerate Constructors' Scheme. The contractor would also need to adhere to the CLOCS standard.

15.32 The Council has a CMP pro-forma which must be used when planning permission is granted and once a Principal Contractor has been appointed. The CMP, in the form of the pro-forma, would need to be approved by the Council prior to any works commencing on site.

15.33 There are a number of significant developments in the general vicinity of the site that are currently under construction or have been approved. This part of the borough already experiences significant traffic problems. The construction of various significant developments concurrently raises concerns about cumulative impacts on the transport network as well as amenity issues such as noise, dust, air quality and vibration. The developer and principal contractor, once appointed, will be required to work closely with other contractors working nearby with a view to minimising and mitigating the cumulative impacts of construction.

15.34 The development, if approved, would require significant input from officers. This would relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the CMP during demolition and construction. A CMP implementation support contribution of £22,816 would therefore be secured via a Section 106 planning obligation if planning permission were granted.

15.35 A further requirement to form a construction working group consisting of representatives from the local community would also be secured via a Section 106 planning obligation if planning permission were granted.

### Conclusion

15.36 The proposal would be acceptable in terms of transport implications subject to various conditions and section 106 planning obligations being secured as follows:

- Condition requiring the provision and ongoing retention of 429 covered, secure and fully enclosed cycle parking spaces for staff

- Condition requiring the provision and ongoing retention of 17 secure cycle parking spaces for visitors
- Condition requiring the provision and ongoing retention of 2 electric vehicle charging points adjacent to the 4 car parking spaces at upper basement level
- Condition requiring the provision and ongoing retention of 1 electric vehicle charging point adjacent to the 3 loading bays at ground level
- Highways contribution of £88,259 (includes cost of installation of 40 cycle parking spaces for visitors on the public highway)
- Level plans Pedestrian, Cycling and Environmental Improvements contribution of £79,885.
- Construction management plan (CMP) and CMP implementation support contribution of £22,816
- Requirement to form a construction working group consisting of representatives from the local community
- Car-free development
- Servicing management plan
- Travel plan and associated monitoring and measures contribution of £9,618

## **16 Safety and security**

16.1 Camden Local Plan policy C5 (Safety and security) and CPG (Design) are relevant with regards to secure by design.

16.2 The Designing Out Crime officer was consulted prior to the application being submitted and was involved in the design process. During a meeting between the applicant and the MET Police Secure by Design Officer, the following issues were raised:

- The site is well known for anti-social behaviour and arrests are often made.
- The southern stairwell to the Kingsway block is a blind spot which instils fear of crime. Preference is for the stair to be enclosed.
- It would be preferable to have separate uses and entrances as far away from each other as possible. It will be important to have a management and security strategy to deal with the multiple entrances.
- Tables and chairs would need to be removed nightly. Entrances should be closed to the public when the retail units close.
- Landscaping including the selection of planting will aid security on the site.



- The ramp could present security issues. The under-croft would need to be secured from pedestrians and well lit. Access must be non-climbable and ideally fob-controlled.

16.3 The applicant has confirmed these principles will be adopted as the detailed design progresses; primarily by controlling entry in the building and ensuring appropriate doors, windows and locking systems are installed. Access control, CCTV, intruder detection, lighting and staffing are all to be considered and designed together, in an integrated security approach. Details of the proposed security measures will be secured by condition to be approved by the Council prior to installation.

## **17 Refuse and recycling**

17.1 Camden Local Plan policy CC5 (Waste) and CPG (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.

17.2 Waste storage areas for both buildings is located within a dedicated central store within basement level 2. This can be accessed via the goods lift to the Kingsway building or via a dedicated service route from the tower.

17.3 The bin store and sizes have been designed according to the Council's Refuse and Recycling Storage design guide and British Standards. The refuse vehicle will stop and collect within the public realm during serviceable hours. As per the existing situation a private collection contract will be made for the collection of waste, and bins will be collected daily.

17.4 The proposed arrangements are considered acceptable and the Servicing Management Plan could be secured by S106 Legal Agreement if planning permission is granted.

## **18 Employment and training opportunities**

18.1 The proposed development is large enough to generate significant local economic benefits. Camden Local Plan policies E1 and E2 and Camden Planning Guidance state that in the case of such developments the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services.

18.2 In line with the Employment sites and business premises CPG, a range of training and employment benefits are to be secured in order to provide opportunities during and after the construction phase for local residents and

businesses. This package of recruitment, apprenticeship and procurement measures will be secured via S106 / condition and will comprise:

Construction phase:

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of one week before marketing more widely.
- The applicant should provide 26 construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre.
- If the build costs of the scheme exceed £3 million the applicant must recruit 1 construction apprentice per £3million of build costs and pay the council a support fee of £1,700 per apprentice. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Recruitment of non-construction apprentices should be conducted through the Council's Economic Development team.
- If the value of the scheme exceeds £1 million, the applicant must also sign up to the Camden Local Procurement Code.
- The applicant should provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site.

End use phase:

- The applicant / end users should provide a specified number (still to be agreed with the applicant) of end use apprenticeships within a range of roles (examples include hospitality, business administration, finance, customer service, IT).
- The applicant / end users should provide eight end use work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's Economic Development team.
- Commitment to paying and promoting London Living Wage.
- Providing opportunities for Camden residents with Special Educational Needs and Disabilities (SEND) in cooperation with the local authority.
- The applicant should facilitate promotion of the Camden STEAM Commission objectives amongst end use occupiers.

18.3 The proposals are therefore in accordance with the guidance set out in policies E1 and E2 of the Camden Local Plan and the Employment sites and business premises CPG.

## 19 Planning obligations

19.1 The following contributions are required to mitigate the impact of the development upon the local area, including on local services. These heads of terms will mitigate any impact of the proposal on the infrastructure of the area.

<b>Contribution</b>	<b>Amount (£)</b>
Payment in lieu of residential floorspace	£1,003,649.50
Highways	£88,259.00
Pedestrian, cycling and environmental contributions	£79,885.00
CMP Implementation support contribution	£22,816.00
Travel plan monitoring	£9,618.00
<b>TOTAL</b>	<b>£1,204,227.50</b>

## 20 Mayor of London's Crossrail CIL

20.1 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) as it includes the creation of more than 100sqm new floorspace. Based on the Mayor's CIL charging schedule and the information provided as part of the application, the Mayoral CIL liability is £221,515.00 based on the following uplifts and contributions:

- Office/employment uplift 194sqm x £185 = £35,890.00.
- Retail uplift 1,125sqm x £165 = £ 185,625.00.

20.2 This would be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index.

## 21 Camden CIL

21.1 The proposal would be liable for the Camden Community Infrastructure Levy (CIL). The site is located within Zone A. The estimate based on the uplift of floorspace and the proportion of office floorspace and retail floorspace

proposed, the Camden CIL liability is £36,855.00 based on the following uplifts and contributions:

- Office/employment uplift 194sqm x £45 = £8,730.00.
- Retail uplift 1,125sqm x £25 = £ 28,125.00.

## **22 CONCLUSION**

22.1 The proposed development is considered to sensitively extend and refurbish the existing buildings, and would preserve the special architectural, historic and technical significance of the listed building. The less than substantial harm caused would be outweighed by a number of public benefits including refurbishing and enhancing the appearance of the listed building and its setting, improvements to the public realm surrounding the buildings, and securing the optimum viable use as offices, which is of principal importance to the building's architectural and historic significance.

22.2 Although the development would not provide residential floorspace as required by policy H2, this is not considered appropriate given the listed status of the building, and the applicant has agreed to the full policy compliant payment in lieu. The applicant has also agreed to a package of employment and training measures which will benefit the local population during construction and end use phases of the development. The proposed introduction of new retail/restaurant floorspace and flexible officer/event space is considered appropriate in this location and would contribute to the existing mix of uses in the area without causing harm to local amenity. Similarly, the proposal is considered to be acceptable in terms of the transport implications, waste and recycling and air quality implications subject to the conditions and planning obligations listed below. As such, the proposed development would accord with the requirements of the Camden Local Plan and it is recommended that planning permission and listed building consent are granted.

## **23 RECOMMENDATIONS**

**23.1 Planning Permission is recommended subject to conditions and a Section 106 Legal Agreement covering the following Heads of Terms:-**

Housing

- Payment in lieu of £1,003,649.50

## Employment and training

### Construction phase:

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of one week before marketing more widely.
- The applicant should provide 26 construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre.
- If the build costs of the scheme exceed £3 million the applicant must recruit 1 construction apprentice per £3million of build costs and pay the council a support fee of £1,700 per apprentice. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Recruitment of non-construction apprentices should be conducted through the Council's Economic Development team.
- If the value of the scheme exceeds £1 million, the applicant must also sign up to the Camden Local Procurement Code.
- The applicant should provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site.

### End use phase:

- The applicant / end users should provide a specified number (still to be agreed with the applicant) of end use apprenticeships within a range of roles (examples include hospitality, business administration, finance, customer service, IT).
- The applicant / end users should provide eight end use work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's Economic Development team.
- Commitment to paying and promoting London Living Wage.
- Providing opportunities for Camden residents with Special Educational Needs and Disabilities (SEND) in cooperation with the local authority.
- The applicant should facilitate promotion of the Camden STEAM Commission objectives amongst end use occupiers.

## Energy and sustainability

- Sustainability measures to be secured through S106 Sustainability Plan

- indicating BREEAM Excellent level and minimum credit targets in Energy (60%), Materials (40%) and Water (60%).
- Building management plan and Green Building Guide ensuring future tenants of the Shell & core elements will align with BREEAM Excellent 'Fit-Out' standards
- Energy provisions to be secured through S106 EE&RE plan as per Energy Statement with minimum targets as follows –
  - Extensions 36.79% beyond Part L2B 2013
  - Existing parts 59.47% beyond Part L 2002
  - Renewable energy: Maximum feasible target as determined by solar PV feasibility study.

## Transport

- Highways contribution of £88,259
- Level plans
- Pedestrian, Cycling and Environmental Improvements contribution of £79,885.
- Construction management plan (CMP) and CMP implementation support contribution of £22,816
- Requirement to form a construction working group consisting of representatives from the local community
- Car-free development
- Servicing management plan
- Travel plan and associated monitoring and measures contribution of £9,618
- Operation management plan for flexible B1/B1 event space.

## 23.2 Listed Building Consent is recommended subject to conditions.

## 24 LEGAL COMMENTS

24.1 Members are referred to the note from the Legal Division at the start of the Agenda.

## 25 Conditions – planning application

1	<p>Three years from the date of this permission</p> <p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and</p>
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	Country Planning Act 1990 (as amended).
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Existing drawings</p> <p>18077-SQP-ZZ-ZZ-DP-A-PL00001 rev A, 18077-SQP-ZZ-B2-DP-A-PL00002 rev A, 18077-SQP-ZZ-B1-DP-A-PL00003 rev A, 18077-SQP-ZZ-00-DP-A-PL00004 rev A, 18077-SQP-ZZ-01-DP-A-PL00006 rev A, 18077-SQP-ZZ-02-DP-A-PL00007 rev A, 18077-SQP-ZZ-03-DP-A-PL00008 rev A, 18077-SQP-ZZ-04-DP-A-PL00009 rev A, 18077-SQP-ZZ-05-DP-A-PL00010 rev A, 18077-SQP-ZZ-06-DP-A-PL00011 rev A, 18077-SQP-ZZ-07-DP-A-PL00012 rev A, 18077-SQP-ZZ-08-DP-A-PL00013 rev A, 18077-SQP-ZZ-09-DP-A-PL00014 rev A, 18077-SQP-ZZ-10-DP-A-PL00015 rev A, 18077-SQP-ZZ-11-DP-A-PL00016 rev A, 18077-SQP-ZZ-12-DP-A-PL00017 rev A, 18077-SQP-ZZ-13-DP-A-PL00018 rev A, 18077-SQP-ZZ-14-DP-A-PL00019 rev A, 18077-SQP-ZZ-15-DP-A-PL00019 rev A, 18077-SQP-ZZ-16-DP-A-PL00020 rev A, 18077-SQP-ZZ-RF-DP-A-PL00021 rev A, 18077-SQP-01-ZZ-DE-A-PL00300 rev A, 18077-SQP-01-ZZ-DE-A-PL00301 rev A, 18077-SQP-01-ZZ-DE-A-PL00302 rev A, 18077-SQP-01-ZZ-DE-A-PL00303 rev A, 18077-SQP-01-ZZ-DE-A-PL00304 rev A, 18077-SQP-01-ZZ-DS-A-PL00600 rev A.</p> <p>Demolition drawings</p> <p>18077-SQP-ZZ-B2-DP-A-PL01002 rev A, 18077-SQP-ZZ-B1-DP-A-PL01003 rev A, 18077-SQP-ZZ-00-DP-A-PL01004 rev B, 18077-SQP-ZZ-01-DP-A-PL01006 rev A, 18077-SQP-ZZ-02-DP-A-PL01007 rev A, 18077-SQP-ZZ-03-DP-A-PL01008 rev A, 18077-SQP-ZZ-04-DP-A-PL01009 rev A, 18077-SQP-ZZ-05-DP-A-PL01010 rev A, 18077-SQP-ZZ-06-DP-A-PL01011 rev A, 18077-SQP-ZZ-07-DP-A-PL01012 rev A, 18077-SQP-ZZ-08-DP-A-PL01013 rev A, 18077-SQP-ZZ-09-DP-A-PL01014 rev A, 18077-SQP-ZZ-10-DP-A-PL01015 rev A, 18077-SQP-ZZ-11-DP-A-PL01016 rev A, 18077-SQP-ZZ-12-DP-A-PL01017 rev A, 18077-SQP-ZZ-13-DP-A-PL01018 rev A, 18077-SQP-ZZ-14-DP-A-PL01019 rev A, 18077-SQP-ZZ-15-DP-A-PL01019 rev A, 18077-SQP-ZZ-16-DP-A-PL01020 rev B, 18077-SQP-ZZ-RF-DP-A-PL01021 rev B, 18077-SQP-01-ZZ-DE-A-PL01300 rev B, 18077-SQP-01-ZZ-DE-A-PL01301 rev B, 18077-SQP-01-ZZ-DE-A-PL01302 rev B, 18077-SQP-01-ZZ-DE-A-PL01303 rev B, 18077-SQP-01-ZZ-DE-A-PL01304 rev B</p> <p>Proposed drawings</p> <p>18077-SQP-ZZ-B2-DP-A-PL20002 rev A, 18077-SQP-ZZ-B1-DP-A-PL20003 rev A, 18077-SQP-ZZ-00-DP-A-PL20004 rev B, 18077-SQP-ZZ-01-DP-A-</p>

	<p>PL20006 rev A, 18077-SQP-ZZ-02-DP-A-PL20007 rev A, 18077-SQP-ZZ-03-DP-A-PL20008 rev A, 18077-SQP-ZZ-04-DP-A-PL20009 rev A, 18077-SQP-ZZ-05-DP-A-PL20010 rev A, 18077-SQP-ZZ-06-DP-A-PL20011 rev A, 18077-SQP-ZZ-07-DP-A-PL20012 rev A, 18077-SQP-ZZ-08-DP-A-PL20013 rev B, 18077-SQP-ZZ-09-DP-A-PL20014 rev B, 18077-SQP-ZZ-10-DP-A-PL20015 rev B, 18077-SQP-ZZ-11-DP-A-PL20016 rev B, 18077-SQP-ZZ-12-DP-A-PL20017 rev B, 18077-SQP-ZZ-13-DP-A-PL20018 rev B, 18077-SQP-ZZ-14-DP-A-PL20019 rev B, 18077-SQP-ZZ-15-DP-A-PL20020 rev B, 18077-SQP-ZZ-16-DP-A-PL20021 rev B, 18077-SQP-ZZ-RF-DP-A-PL20022 rev B, 18077-SQP-ZZ-RF-DP-A-PL20023 rev B, 18077-SQP-01-ZZ-DE-A-PL20300 rev B, 18077-SQP-01-ZZ-DE-A-PL20301 rev B, 18077-SQP-01-ZZ-DE-A-PL20302 rev B, 18077-SQP-01-ZZ-DE-A-PL20303 rev B, 18077-SQP-01-ZZ-DE-A-PL20304 rev B, 18077-SQP-01-ZZ-DS-A-PL20600 rev B.</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Approved documents</p> <p>The development hereby permitted shall be carried out in accordance with the following approved documents:</p> <p>Design and Access Statement dated May 2019 and Substitution Pack dated September 2019 prepared by Squire &amp; Partners  Historic Building Report and Heritage Views Impact Assessment prepared by Donald Insall Associates dated May 2019  Town Planning Statement prepared by Gerald Eve LLP dated 24 May 2019  Daylight and Sunlight Report dated May 2019 prepared by Point 2 Surveyors  Energy Statement - Stage 2 report ref: 8099 dated 22/05/2019 prepared by RES  Sustainability Statement ref: 8809 dated 21/05/2019 prepared by RES  Drainage Strategy Report ref: 101478-PF-ZZ-XX-RPT-D-0001 dated May 2019 prepared by Pell Frischmann  Air Quality Assessment ref: 25738-RP-SU-001 dated 20 May 2019 prepared by Hilson Moran  Transport Assessment dated May 2019 prepared by Caneparo Associates  Outline Construction Logistics Plan dated August 2019 prepared by Caneparo Associates  Structural Summary Report dated May 2019 prepared by Pell Frischmann  Geotechnical &amp; Geo-Environmental Desk Study dated January 2019 prepared by Pell Frischmann  Odour Risk Assessment ref: R07 prepared by Long and Partners  Draft Construction Management Plan prepared by Aecom  Waste Management Plan dated May 2019 prepared by Aecom</p>



	<p>Landscape Design &amp; Access Statement dated May 2019 prepared by Gustafson Porter and Bowman</p> <p>Framework Operational Management Plan dated May 2019 prepared by Seaforth Land</p> <p>Environmental Noise Survey Report ref 25748/ENS Rev3 dated 12 July 2019 prepared by Hann Tucker</p> <p>Statement of community involvement dated May 2019 prepared by London Communications Agency.</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
4	<p>External fixtures</p> <p>No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the buildings.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 (Design) of the London Borough of Camden Local Plan 2017.</p>
5	<p>Long stay cycle parking</p> <p>Prior to first occupation of the development, 429 long-stay cycle parking spaces shall be provided for staff and permanently retained thereafter. The cycle parking shall be covered, secure and fully enclosed.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 (Prioritising walking, cycling and public transport) of the London Borough of Camden Local Plan 2017.</p>
6	<p>Short stay cycle parking</p> <p>Prior to first occupation of the development, 34 secure cycle parking spaces shall be provided for visitors and permanently retained thereafter.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 (Prioritising walking, cycling and public transport) of the London Borough of Camden Local Plan 2017.</p>
7	<p>Electric vehicle charging points</p> <p>The development shall not be occupied until 2 electric vehicle charging points</p>

	<p>are provided adjacent to the 4 car parking spaces at upper basement level, and 1 electric vehicle charging point is provided adjacent to the 3 loading bays at ground level.</p> <p>The electric vehicle charging points shall be permanently retained and maintained thereafter.</p> <p>Reason: To ensure that the development promotes the use of sustainable transport means and the use of low emission vehicles in accordance with policy T2 (Parking and car free development) of the London Borough of Camden Local Plan 2017.</p>
8	<p>Fixed plant</p> <p>Noise levels from all fixed plant at a point 1 metre external to sensitive facades shall be at least 10dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 15dB(A) below the LA90, expressed in dB(A).</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 (Managing the impact of development) and A4 (Noise and vibration) of the London Borough of Camden Local Plan 2017.</p>
9	<p>Fixed plant anti-vibration</p> <p>Before the use commences, all plant and machinery installed and or operated (including new kitchen extract and supply fans, air conditioning condensers, other supply and extract fans, ASHPs, refrigeration condensers along with associated ductwork, pipework and ancillaries) installed and/or operated in connection with the carrying out of this permission shall be installed with suitable acoustic isolation to prevent the transmission of noise and/or vibration to other parts of the application buildings.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 (Managing the impact of development) and A4 (Noise and vibration) of the London Borough of Camden Local Plan 2017.</p>

10	<p data-bbox="280 197 416 226">Asbestos</p> <p data-bbox="280 282 1417 696">The developer must either submit evidence that site buildings were built post 2000 or provide an intrusive pre-demolition and refurbishment asbestos survey in accordance with HSG264 supported by an appropriate mitigation scheme to control risks to future occupiers. The scheme must be written by a suitably qualified person and submitted to the Local Planning Authority (LPA) for approval before commencement. The scheme as submitted shall demonstrably identify potential sources of asbestos contamination and detail removal or mitigation appropriate for the proposed end use. Detailed working methods are not required but the scheme of mitigation shall be independently verified to the satisfaction of the LPA prior to occupation.</p> <p data-bbox="280 745 1417 909">Reason To protect future occupiers of the development from the possible contamination arising in connection with the buildings on the site in accordance with policies A1 (Managing impact of development), C1 (Health) and CC5 (Waste) of the London Borough of Camden Local Plan 2017.</p>
11	<p data-bbox="280 958 616 987">Site/land contamination</p> <p data-bbox="280 1043 1417 1328">The design and construction of the development shall be carried out strictly in accordance with the recommendations of the Geotechnical &amp; Geo-Environmental Desk Study (Ref: 101478-PF-ZZ-XX-RP-C-0001) hereby approved. Should any contamination be discovered at the site during the construction phase the following components to address the risk associated with site contamination shall be submitted to and approved in writing by the LPA before construction re-commences.</p> <p data-bbox="280 1379 1417 1496">a) A ground investigation of the area of land contamination identified to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site;</p> <p data-bbox="280 1547 1417 1711">b) The results of the investigation and detailed risk assessment referred to in (a) and, based on these, in the event that remediation measures are identified necessary a remediation strategy shall be submitted giving full details of the remediation measures required and how they are to be undertaken;</p> <p data-bbox="280 1762 1417 1879">c) A verification report providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (b) are complete.</p> <p data-bbox="280 1930 1417 2002">The development shall be carried out strictly in accordance with the relevant risk assessment, site investigation, remediation strategy and verification plan</p>

	<p>so approved, and no change therefrom shall take place without prior written consent from the LPA.</p> <p>Any investigation and risk assessment must be undertaken in accordance with the requirements of the Environment Agency's Model Procedures for the Management of Contamination (CLR11). In the event that additional significant contamination is found at any time when carrying out the approved development it must be reported in writing immediately to the LPA.</p> <p>Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1 (Delivery and location of growth), D1 (Design) and A1 (Managing the impact of development) of the London Borough of Camden Local Plan 2017.</p>
12	<p><b>Deliveries</b></p> <p>Deliveries may not arrive for the Class B1 and B1/Event (sui generis) uses, depart or be loaded or unloaded outside the following times: 08.00hrs and 18.00hrs.</p> <p>Deliveries may not arrive for the Class A1/A3 uses, depart or be loaded or unloaded outside the following times: 07.00hrs and 18.00hrs.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 (Managing the impact of development) and A4 (Noise and vibration) of the London Borough of Camden Local Plan 2017.</p>
13	<p><b>Artificial Lighting</b></p> <p>Prior to occupation the developer shall demonstrate to the Local Planning Authority that any artificial lighting in connection to the development shall not increase the pre-existing illuminance at light sensitive receptor locations when the light is operating.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 (Managing the impact of development) and A4 (Noise and vibration) of the London Borough of Camden Local Plan 2017.</p>

14	<p>Solar PV feasibility and details</p> <p>a) Prior to discharge of the s106 Energy Efficiency &amp; 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.</p> <p>If solar photovoltaics are found to be feasible:</p> <p>b) Prior to commencement of above ground works, drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 (Climate change mitigation) of the London Borough of Camden Local plan 2017.</p>
15	<p>Sustainable Urban Drainage</p> <p>Prior to commencement of development, full details of the sustainable drainage system (SuDS) including:</p> <ul style="list-style-type: none"> <li>a) Descriptions and drawings showing SuDS, sewers and connections</li> <li>b) Demonstration of no additional flood risk to the basement and structures including from the water tank</li> <li>c) Evidence of consent by Thames Water to the detailed design</li> <li>d) Confirmation of exceedance flow paths on and off site showing no additional risks</li> </ul> <p>shall be submitted to and approved in writing by the local planning authority. Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water, and shall demonstrate the run off rates approved by the Local Planning Authority. Details shall include a lifetime maintenance plan, and systems shall thereafter be retained and maintained in accordance with the</p>

	<p>approved details.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 (Adapting to climate change) and CC3 (Water and flooding) of the London Borough of Camden Local Plan 2017.</p>
16	<p>Air quality</p> <p>At least 4 months prior to commencement of development excluding site preparation works, a detailed air quality assessment including acceptable methodology and assumptions shall be submitted to the LPA for approval. If mitigation is applicable:</p> <p>a) full details of the mechanical ventilation systems including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads and the boiler stacks and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details; and</p> <p>b) evidence that an appropriate NO<sub>2</sub> filtration system on the mechanical ventilation intake has been installed to the relevant parts of the development, and a detailed mechanism to secure maintenance of this system and changing of filters, should be submitted to the Local Planning Authority and approved in writing.</p> <p>If the air quality assessment indicates medium or high construction related dust risk, the following shall be submitted to the LPA for approval:</p> <p>c) a Construction Dust &amp; Emissions Risk Assessment and Mitigation Proposals report produced by a suitably qualified professional. Unless recommended otherwise by the report, real-time air quality monitoring shall be implemented on site including for the purposes of establishing a baseline;</p> <p>d) prior to installing any air quality monitors for these purposes, full details concerning them must be submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they have been installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;</p>

	<p>e) prior to commencement, evidence shall be submitted to the local planning authority for approval, demonstrating that the monitors have been in place for at least 3 months prior to the proposed implementation date.</p> <p>The monitors shall be retained and maintained on site for the duration of the development in accordance with the details thus approved.</p> <p>Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 (Managing the impact of development) and CC4 (Air quality) of the London Borough of Camden Local Plan Policies.</p>
17	<p>Air quality - off road vehicles</p> <p>All non-Road mobile Machinery (any mobile machine, item of transportable industrial equipment, or vehicle - with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the [demolition and/construction] phase of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the [demolition and/construction] phase of the development.</p> <p>Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of policies G1 (Delivery and location of growth), A1 (Managing the impact of development), CC1 (Climate change mitigation) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.</p>
18	<p>Landscape details</p> <p>Prior to commencement of the relevant works, full details of hard and soft landscaping and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning authority in writing. Such details shall include details of any proposed earthworks including grading, mounding and other changes in ground levels. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.</p> <p>Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2 (Open space), A3 (Biodiversity), D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.</p>

19	<p>Landscaping</p> <p>All hard and soft landscaping works shall be carried out in accordance with the approved landscape details prior of the occupation of the development. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.</p> <p>Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2 (Open space), A3 (Biodiversity), D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.</p>
20	<p>Hours of use</p> <p>The B1 event space hereby permitted shall not be carried out outside the following times: 07:00am – 01:00am Mondays to Saturdays and 08:00am – 10:30pm on Sundays and Bank Holidays.</p> <p>The A1/A3 space hereby permitted at 43 – 59 Kingsway shall not be carried out outside the following times: 06:30am – 12:00am seven days a week.</p> <p>The A1/A3 space hereby permitted at 1 Kemble Street shall not be carried out outside the following times: 08:00 – 12:00am Thursdays to Saturdays and 08:00am – 11:00pm on Sundays to Wednesdays and Bank Holidays.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1 (Delivery and location of growth), A1 (Managing the impact of development), A4 (Noise and vibration), TC1 (Quantity and location of retail development) and TC3 (Shops outside of centres) of the London Borough of Camden Local Plan 2017.</p>
21	<p>Retail layout</p> <p>Prior to occupation, floor plans shall be provided depicting the size, use and layout of the retail and restaurant uses hereby approved to the ground floor level of the Kingsway building.</p> <p>Reason: To ensure the mix of uses contributes to the success and vibrancy of</p>



	this part of the Central London Area, in accordance with the requirements of policies TC1 (Quantity and location of retail development) and TC2 (Camden's centres and other shopping areas) of the London Borough of Camden Local Plan 2017.
22	<p>Safety and security</p> <p>Details of security measures shall be submitted to and approved by the local planning authority prior to the commencement of the relevant part of the development. The development shall be carried out in accordance with any such approved measures.</p> <p>Reason for condition: To ensure that suitable measures are taken in respect of security of the site, in accordance with policies D1 (Design) and C5 (Safety and security) of the London Borough of Camden Local Plan 2017.</p>

## 26 Informatives – planning application

1	You are advised the developer and appointed / potential contractors should take the Council's guidance on Construction Management Plans (CMP) into consideration prior to finalising work programmes and must submit the plan using the Council's CMP pro-forma; this is available on the Council's website at <a href="https://beta.camden.gov.uk/web/guest/construction-management-plans">https://beta.camden.gov.uk/web/guest/construction-management-plans</a> or contact the Council's Planning Obligations Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444). No development works can start on site until the CMP obligation has been discharged by the Council and failure to supply the relevant information may mean the council cannot accept the submission as valid, causing delays to scheme implementation. Sufficient time should be afforded in work plans to allow for public liaison, revisions of CMPs and approval by the Council.
2	This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
3	Your proposals may be subject to control under the Building Regulations and/or the

	<p>London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
4	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website at <a href="https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319">https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319</a> or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
5	<p>This permission is granted without prejudice to the necessity of obtaining consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Application forms may be obtained from the Council's website, <a href="http://www.camden.gov.uk/planning">www.camden.gov.uk/planning</a> or the Camden Contact Centre on Tel: 020 7974 4444 or email <a href="mailto:env.devcon@camden.gov.uk">env.devcon@camden.gov.uk</a>).</p>
6	<p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
7	<p>You are advised that if implemented, the alternative use permission hereby granted gives flexibility of use for 10 years from the date of this permission. After 10 years the lawful use would revert to whichever of the uses is taking place at the time.</p>
8	<p>This proposal is liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at <a href="http://www.camden.gov.uk/cil">www.camden.gov.uk/cil</a> for more information, including guidance on your liability,</p>

	charges, how to pay and who to contact for more advice.
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## 27 Conditions – listed building consent

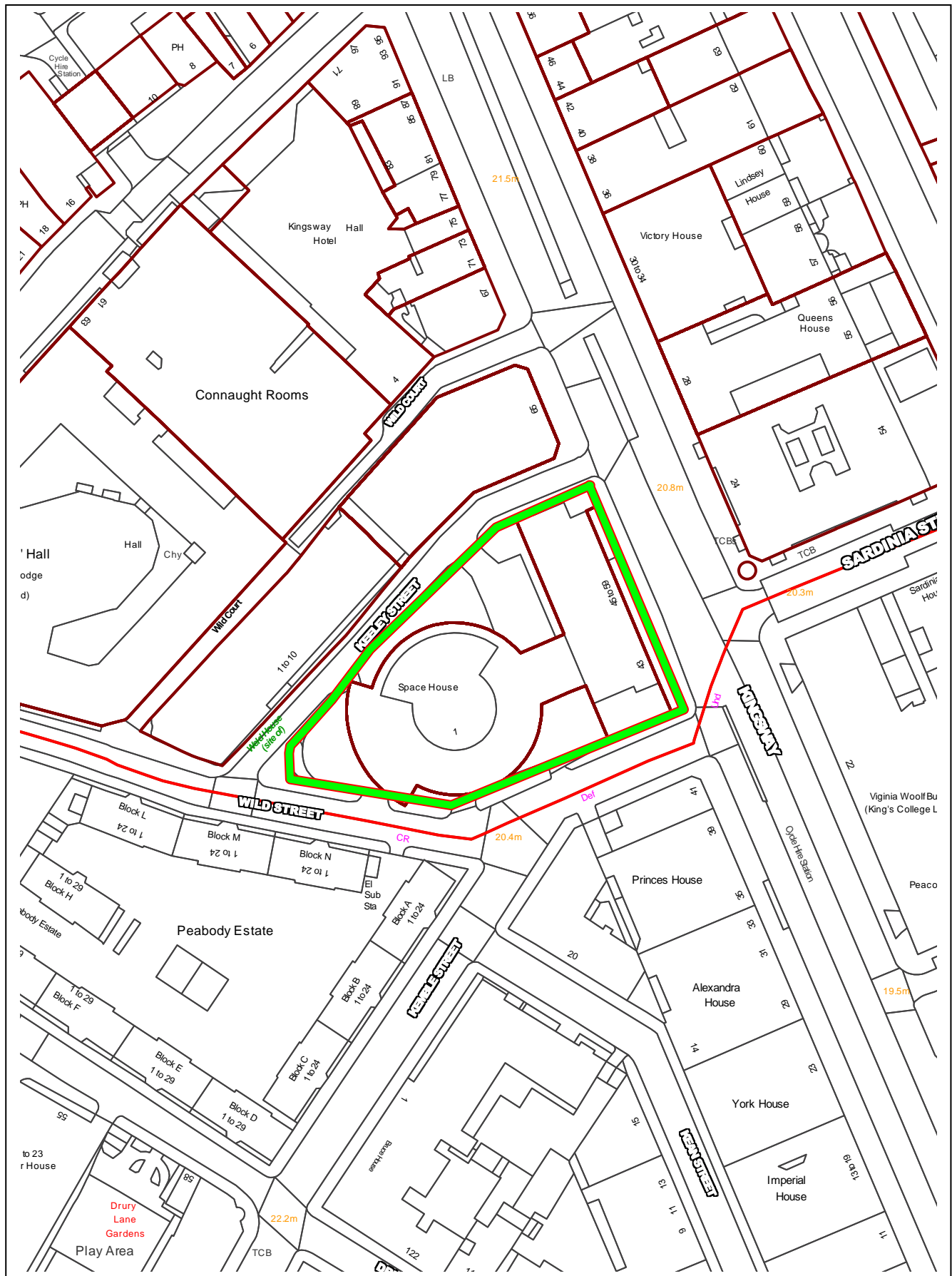
1	<p>The works hereby permitted shall be begun not later than the end of three years from the date of this consent.</p> <p>Reason: In order to comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Existing drawings  18077-SQP-ZZ-ZZ-DP-A-PL00001 rev A, 18077-SQP-ZZ-B2-DP-A-PL00002 rev A, 18077-SQP-ZZ-B1-DP-A-PL00003 rev A, 18077-SQP-ZZ-00-DP-A-PL00004 rev A, 18077-SQP-ZZ-01-DP-A-PL00006 rev A, 18077-SQP-ZZ-02-DP-A-PL00007 rev A, 18077-SQP-ZZ-03-DP-A-PL00008 rev A, 18077-SQP-ZZ-04-DP-A-PL00009 rev A, 18077-SQP-ZZ-05-DP-A-PL00010 rev A, 18077-SQP-ZZ-06-DP-A-PL00011 rev A, 18077-SQP-ZZ-07-DP-A-PL00012 rev A, 18077-SQP-ZZ-08-DP-A-PL00013 rev A, 18077-SQP-ZZ-09-DP-A-PL00014 rev A, 18077-SQP-ZZ-10-DP-A-PL00015 rev A, 18077-SQP-ZZ-11-DP-A-PL00016 rev A, 18077-SQP-ZZ-12-DP-A-PL00017 rev A, 18077-SQP-ZZ-13-DP-A-PL00018 rev A, 18077-SQP-ZZ-14-DP-A-PL00019 rev A, 18077-SQP-ZZ-15-DP-A-PL00019 rev A, 18077-SQP-ZZ-16-DP-A-PL00020 rev A, 18077-SQP-ZZ-RF-DP-A-PL00021 rev A, 18077-SQP-01-ZZ-DE-A-PL00300 rev A, 18077-SQP-01-ZZ-DE-A-PL00301 rev A, 18077-SQP-01-ZZ-DE-A-PL00302 rev A, 18077-SQP-01-ZZ-DE-A-PL00303 rev A, 18077-SQP-01-ZZ-DE-A-PL00304 rev A, 18077-SQP-01-ZZ-DS-A-PL00600 rev A.</p> <p>Demolition drawings  18077-SQP-ZZ-B2-DP-A-PL01002 rev A, 18077-SQP-ZZ-B1-DP-A-PL01003 rev A, 18077-SQP-ZZ-00-DP-A-PL01004 rev B, 18077-SQP-ZZ-01-DP-A-PL01006 rev A, 18077-SQP-ZZ-02-DP-A-PL01007 rev A, 18077-SQP-ZZ-03-DP-A-PL01008 rev A, 18077-SQP-ZZ-04-DP-A-PL01009 rev A, 18077-SQP-ZZ-05-DP-A-PL01010 rev A, 18077-SQP-ZZ-06-DP-A-PL01011 rev A, 18077-SQP-ZZ-07-DP-A-PL01012 rev A, 18077-SQP-ZZ-08-DP-A-PL01013 rev A, 18077-SQP-ZZ-09-DP-A-PL01014 rev A, 18077-SQP-ZZ-10-DP-A-PL01015 rev A, 18077-SQP-ZZ-11-DP-A-PL01016 rev A, 18077-SQP-ZZ-12-DP-A-PL01017 rev A, 18077-SQP-ZZ-13-DP-A-PL01018 rev A, 18077-SQP-ZZ-14-</p>


	<p>DP-A-PL01019 rev A, 18077-SQP-ZZ-15-DP-A-PL01019 rev A, 18077-SQP-ZZ-16-DP-A-PL01020 rev B, 18077-SQP-ZZ-RF-DP-A-PL01021 rev B, 18077-SQP-01-ZZ-DE-A-PL01300 rev B, 18077-SQP-01-ZZ-DE-A-PL01301 rev B, 18077-SQP-01-ZZ-DE-A-PL01302 rev B, 18077-SQP-01-ZZ-DE-A-PL01303 rev B, 18077-SQP-01-ZZ-DE-A-PL01304 rev B</p> <p>Proposed drawings</p> <p>18077-SQP-ZZ-B2-DP-A-PL20002 rev A, 18077-SQP-ZZ-B1-DP-A-PL20003 rev A, 18077-SQP-ZZ-00-DP-A-PL20004 rev B, 18077-SQP-ZZ-01-DP-A-PL20006 rev A, 18077-SQP-ZZ-02-DP-A-PL20007 rev A, 18077-SQP-ZZ-03-DP-A-PL20008 rev A, 18077-SQP-ZZ-04-DP-A-PL20009 rev A, 18077-SQP-ZZ-05-DP-A-PL20010 rev A, 18077-SQP-ZZ-06-DP-A-PL20011 rev A, 18077-SQP-ZZ-07-DP-A-PL20012 rev A, 18077-SQP-ZZ-08-DP-A-PL20013 rev B, 18077-SQP-ZZ-09-DP-A-PL20014 rev B, 18077-SQP-ZZ-10-DP-A-PL20015 rev B, 18077-SQP-ZZ-11-DP-A-PL20016 rev B, 18077-SQP-ZZ-12-DP-A-PL20017 rev B, 18077-SQP-ZZ-13-DP-A-PL20018 rev B, 18077-SQP-ZZ-14-DP-A-PL20019 rev B, 18077-SQP-ZZ-15-DP-A-PL20020 rev B, 18077-SQP-ZZ-16-DP-A-PL20021 rev B, 18077-SQP-ZZ-RF-DP-A-PL20022 rev B, 18077-SQP-ZZ-RF-DP-A-PL20023 rev B, 18077-SQP-01-ZZ-DE-A-PL20300 rev B, 18077-SQP-01-ZZ-DE-A-PL20301 rev B, 18077-SQP-01-ZZ-DE-A-PL20302 rev B, 18077-SQP-01-ZZ-DE-A-PL20303 rev B, 18077-SQP-01-ZZ-DE-A-PL20304 rev B, 18077-SQP-01-ZZ-DS-A-PL20600 rev B.</p> <p>Documents</p> <p>Design and Access Statement dated May 2019 and Substitution Pack dated September 2019 prepared by Squire &amp; Partners; and Historic Building Report and Heritage Views Impact Assessment prepared by Donald Insall Associates dated May 2019</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:</p> <ul style="list-style-type: none"> <li>a) Details of new railings at a scale of 1:10, including materials, finish and method of fixing.</li> <li>b) Plan, elevation and section drawings of all new doors at a scale of 1:10.</li> <li>c) Plan, elevation and section drawings at 1:10 of all new windows, including jambs, head, cill, and mullions where relevant.</li> <li>d) Plan, elevation and section drawings showing new Kingsway shopfronts at a scale of 1:20.</li> <li>e) Manufacturer's specification details of all facing materials (to be submitted to the</li> </ul>

	<p>Local Planning Authority) and samples of those materials (to be provided on site).</p> <p>f) Details and method statement for cleaning of concrete facades.</p> <p>g) Sample panel of concrete to be used for facsimile floor measuring no less than 1x1m to be erected on site.</p> <p>h) Plan, elevation and section drawings of new western canopy glazing at a scale of 1:10 demonstrating join and method of fixing to historic fabric.</p> <p>i) Detailed drawings of staircase reinstated to northern end of Kingsway block.</p> <p>j) Details of new external lighting strategy, including detailed drawings of light fittings, location and luminance levels.</p> <p>k) Plan, elevation and section drawings of new facsimile floor to 1 Kemble Street at a scale of 1:20 showing detailing of new floor and existing floor below.</p> <p>l) Detailed drawings and sample of wall treatment to UKPN substation. Should a green wall prove feasible, details including a) a detailed scheme of maintenance; b) sections at a scale of 1:20 with manufacturer's details demonstrating the construction and materials used; and c) full details of planting species and density shall be submitted.</p> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.</p> <p>Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.</p>
4	<p>All new work and work of making good shall be carried out to match the existing adjacent work as closely as possible in materials and detailed execution.</p> <p>Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.</p>
5	<p>Prior to commencement of the relevant works, a method statement including details of removal/dismantling, retention and reinstatement of the concrete cornice of 1 Kemble Street shall be submitted to and approved in writing by the local planning authority. The relevant works shall not be carried out other than in accordance with the details thus approved.</p> <p>Reason: To safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the London Borough of Camden Local Plan 2017.</p>

## 28 Informatives – listed building consent

1	You are advised that any works of alterations or upgrading not included on the approved drawings which are required to satisfy Building Regulations or Fire Certification may require a further application for listed building consent.
2	This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
3	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website at <a href="https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319">https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319</a> or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>



	<p><b>Application No: 2019/2773/P &amp; 2019/2790/L</b></p> <p><b>Space House</b></p> <p><b>1 Kemble Street</b></p> <p><b>43-59 Kingsway, London, WC2B 6TE</b></p>	<p><b>Scale:</b></p> <p><b>1:1250</b></p> <p><b>Date:</b></p> <p><b>7-Oct-19</b></p>	<p><b>N</b></p> 
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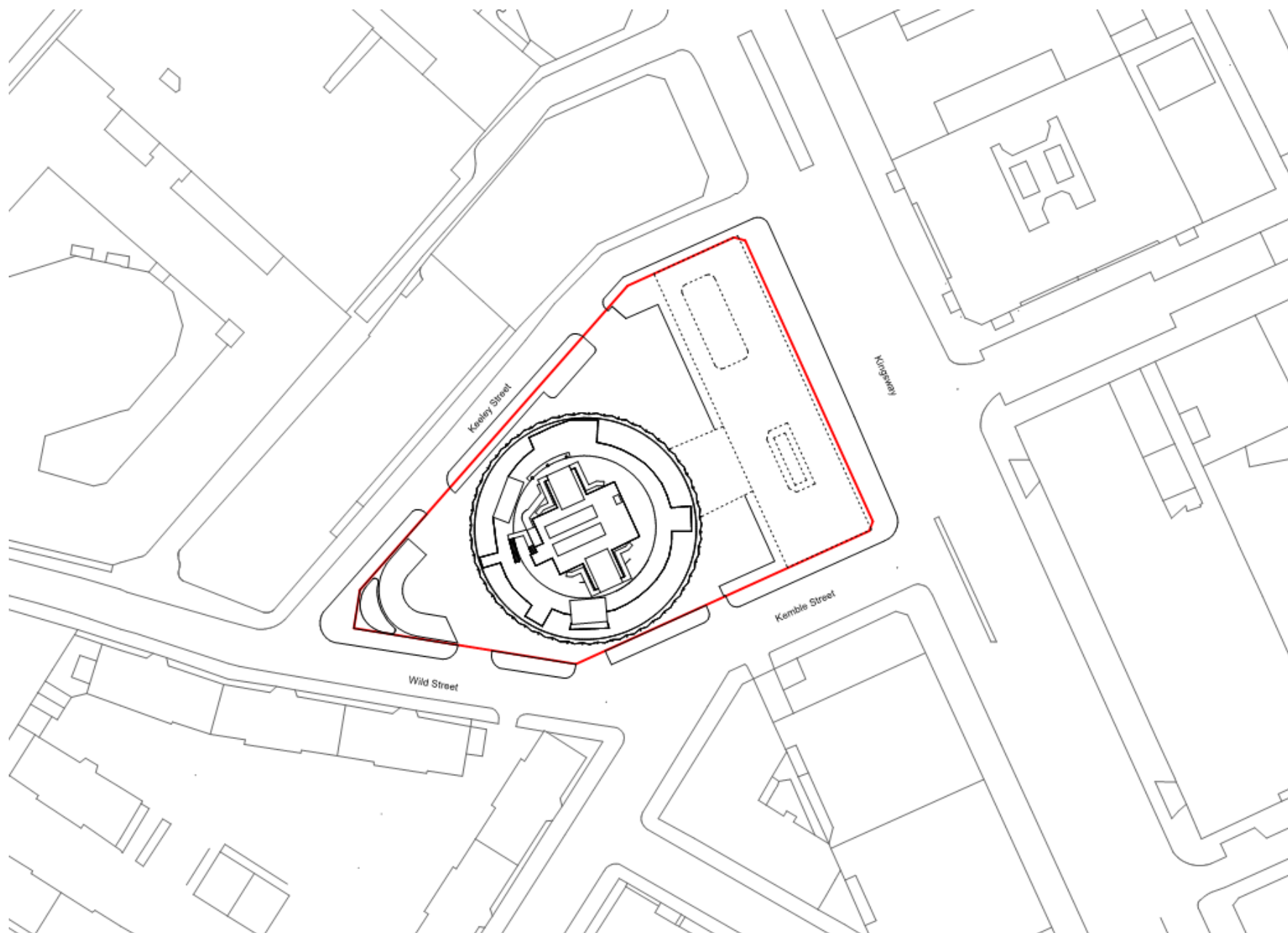
# Planning Committee

18<sup>th</sup> October 2019



2019/2773/P & 2019/2790/L

Space House  
1 Kemble Street  
43-59 Kingsway  
WC2B 6TE

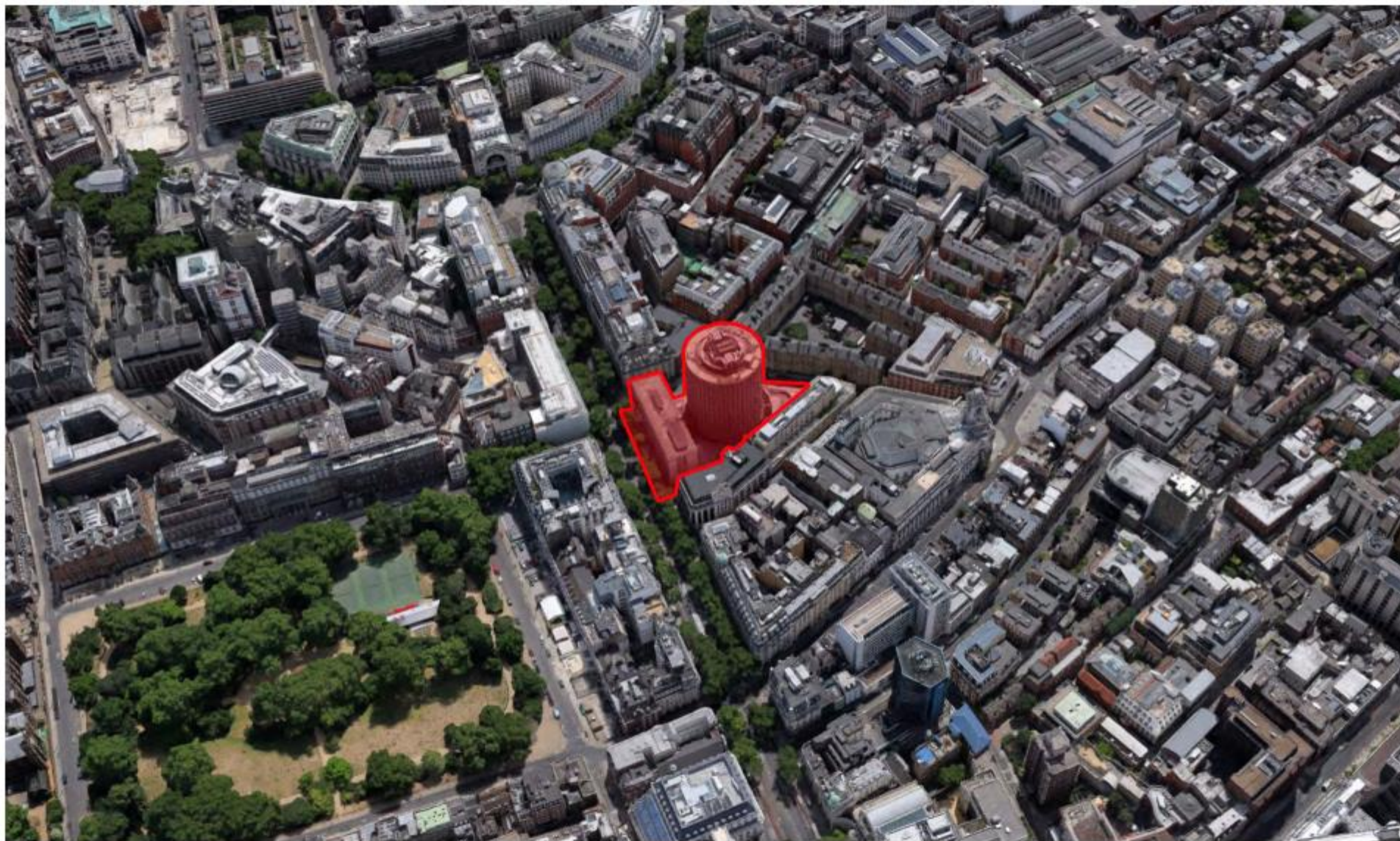




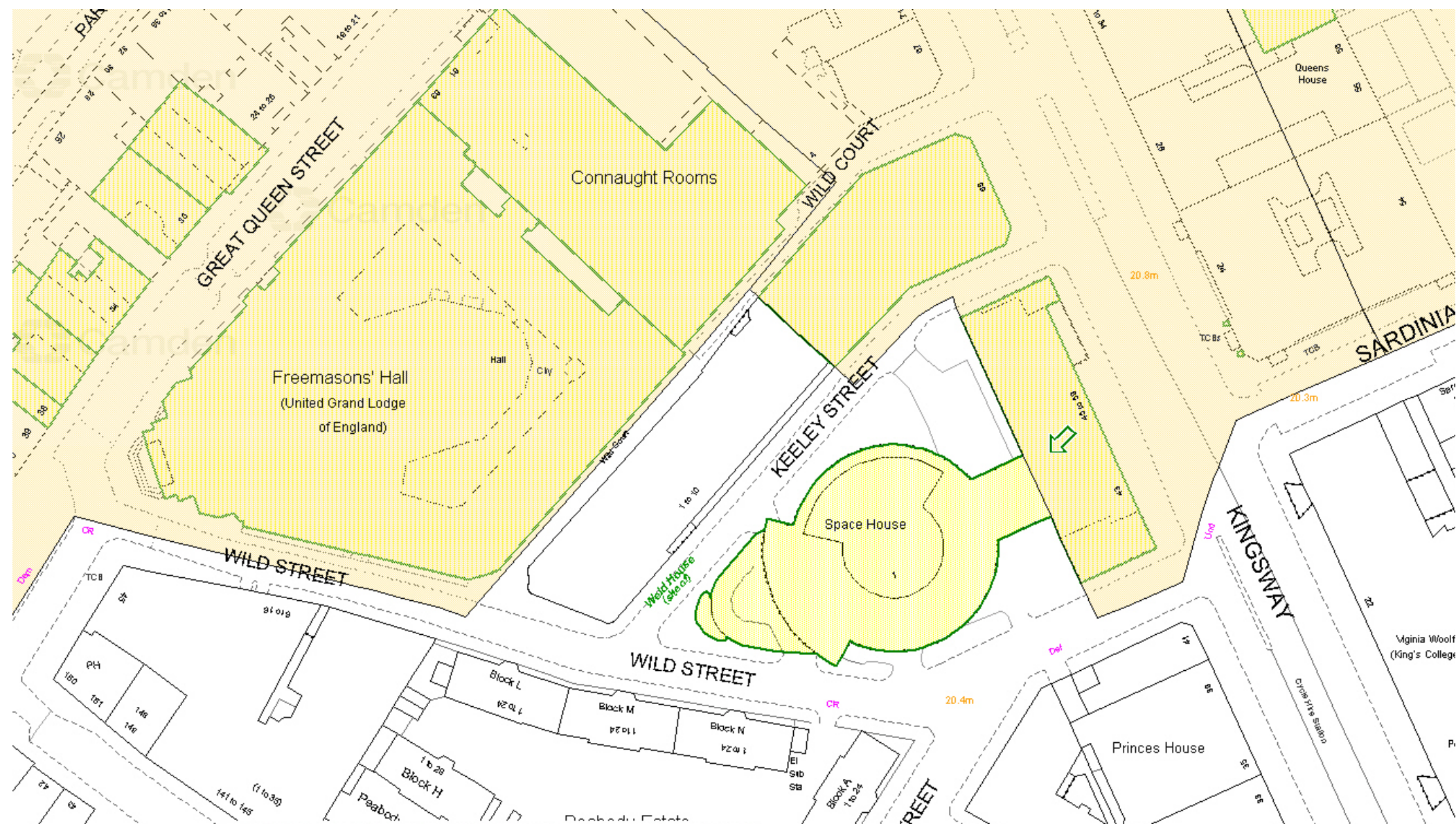




















Listed Buildings

Grade II

Grade II\*



