

**Kings Keeley Limited**  
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**Douglas, Isle of Man**  
**IM2 4DF**

Elaine Quigley  
Planning - Development Control  
Camden Council  
5 Pancras Square  
London  
N1C 4AG

Date: 27 May 2020

Dear Elaine,

**APPLICATIONS FOR PLANNING PERMISSION AND LISTED BUILDING CONSENT –  
SCHEME BY ARENA 8  
KODAK HOUSE, 65 KINGSWAY LONDON WC2B 6TD (APP REF: 2019/5242/P & 2019/3979/L)**

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As you are aware, Clearbell is the asset manager of Kodak House, and Kings Keeley Limited is the owner. Further to ongoing discussions in connection with the above-mentioned applications between your department and planning consultant Firstplan, we are writing to provide my strong support to the intended change of use proposals presented by Arena 8 Limited for the building.

We trust this letter is clear and helpful. By all means, any one of our adviser's at Clearbell engaged with our Kodak House investment/development project would be pleased to talk to you and/or others at Camden, if that might assist.

From our point of view, we're aware that Arena 8's applications are effectively stalled at the current time, pending your authority's receipt of supplemental comments and justification to support the scheme and respond to issues raised by Officers. Our letter is provided as part of some additional information that Kate Matthews (Firstplan) is pulling together for you.

We intend keeping this letter pretty succinct; and we have organised our comments across three topic areas. First of all, we make some remarks about your Council's (policy-based) concern that Arena 8's change of use would, at first-floor level, result in a reduction in office floor area, contrary to policy.

**1. Loss of B1 Floorspace**

In reality, we would suggest that the loss of B1 floorspace at first floor level is actually pretty minor (235 sqm only) and moreover, much of the physical area to be given over to the Company's intended state-of-the-art gym use is not in active office use. It is largely circulation and concourse space (pretty tired, drab space that isn't easily brought into use). At 520 sqm only, the basement would in our view be regarded as a very small fitness space to support the number of workers in the building and promote not just fitness, but health and wellness. We imagine that will be even more apparent, in the 'post Covid-19 Lockdown' circumstances we will all be facing shortly.

The space in question is necessary for Arena 8's proposals to succeed. In our view, the use of both the first floor and ground floor areas by Arena 8 comprises a much better use of this space. Importantly, our recently approved scheme increased the lettable B1 floor space in the building by 100sqm. Consequently, therefore, the 'loss' of lettable B1 floorspace as a result of Arena 8's application is only 135 sqm (not 235 sqm). The overall loss in B1 floorspace is minor and we consider the overall loss in office floorspace to be significantly outweighed by the wider public benefits provided by the gym.

**2. Proposed D2 Use (Gym)**

We support the proposed change of use from Class B1 office to Class D2 (assembly and leisure) gym use. Given the rise of 'wellness' and the growing importance (indeed urgency) of considering

mental wellbeing across any workforce, we would suggest that Camden ought to weigh in policy terms, in its decision-making, the benefit of taking a more holistic approach to the future use and management of large office buildings such as 65 Kingsway. In the current, Covid-19 circumstances, and looking to the future economy and the challenges to be faced post-Covid-19, we would respectfully argue that a text-book interpretation of planning policy (based on a mathematical calculation of floor area totals across planning use classes) is perhaps too narrow and outdated an approach.

Bearing in mind how physical activity and participation in regular exercise can increase self-esteem, improve mental health and quality of life, reduce stress and anxiety, we support Arena 8's business ethos and its role within the workplace. We welcome the Company's desire to expand and take further space at Kodak House, as part of a significant investment and development proposal. Our planning advisers point us to paragraph 91 (c) of the National Planning Policy Framework (2019), which we understand shines a light on the importance of supporting healthy lifestyles, especially where this would address identified local health and well-being needs, for example through the provision of sports facilities. The NPPF expressly advises that planning decisions should take into account and support the delivery of local strategies to improve health and well-being (for all sections of the community).

The current applications tie in with our intention to provide a mixed-use building of the highest quality, with superb, attractive office space and the in-house offer of a state-of-the-art gym. We would reiterate the point that the majority of the building remains in office use and the portion of the building in contention was never meant for office use, having originally being designed and laid out (over a century ago) as a reception area. Lastly, the mixed-use element of the building will in our opinion help establish a strong 'sense of place' for Kodak House, looking to the future – creating an attractive, distinctive place to work and visit.

### **3. Design and Heritage Matters**

Arena 8 and Kings Keeley appointed independent heritage consultants, Jon Lowe Heritage and Bidwells, respectively, and each undertook their own heritage assessments of the building. Both consultants are aligned in their interpretation of the asset's significant and the effects of the proposal upon it.

The significance of the building has been found to overwhelmingly reside in the external façade. While the insertion of the spiral stair will result in the loss of floorplate, it is noted that the overall plan form, volume and decorative details of interest in the space will remain. As an internal feature the external facades will not be affected. Therefore the insertion of the spiral stair is considered to have a neutral impact on the significance of the building.

Indeed, in overall design terms, Arena 8's interior proposals respect the character of the building and its interesting origin, design purpose and 'spirit'. The intended spiral staircase (from first floor to basement level) improves internal linkage and introduces a 'camera lens-shaped' design feature that is simple and elegant and importantly, does not involve substantive structural changes.

The tiling and marble on the first floor of the building is unoriginal, being a later addition to the building. Also, by aligning the two projects in regard to our main entrance being Keeley Street, and Arena 8's entrance is Kingsway, the proposals put forward are thoughtful and appropriate – and taken alongside our own (approved) works seek to restore and enhance this heritage asset.

Any harm to the heritage asset is in our view outweighed by the public benefit of the proposed gym use alongside the other heritage benefits associated with the applications scheme. The interior aspects have been designed sensitively, taking into consideration the character and façade of the existing first floor.

### **4. Concluding Remarks**

Arena 8 is a unique exercise class facility housed in open plan training rooms that offers complete booking flexibility to the member, than some of the leading studios in London. The proposed large wellness suite, that includes hot and cold treatments, infra-red sauna, oxygenation therapies, to nutritional consultation rooms, will help provide a superior work to life balance for the staff in the building and the surrounding area. With the entire interior designed by the renowned Soho House

and Arena 8's technology developed by some of Europe's leading engineers, we believe the customer experience from start to finish will be unrivalled.

We fully support Arena 8 in applying to your authority for the works described above – and we trust that on balance, Camden will find in favour of the well-devised and logical proposals now put forward. These proposals represent private-sector investment in the Borough and in the listed building, contributing to the quality, character and vitality of Kingsway and Covent Garden not just for the short-term, but looking far ahead. Taken alongside other planned developments nearby, such as the approved scheme for the former CAA offices (Space House), new public realm improvements and enhanced linkage between Kingsway and Covent Garden, we would hope that your authority will evaluate Arena 8's proposals in a wider context than that of no.65 alone.

Do let me know if you have any queries, or if anyone at Clearbell can add anything further.  
Thank you for your assistance.

Yours sincerely,

Stuart Gibson  
**Director**

*Cc. project team*