Space House, 1 Kemble Street & 43-59 Kingsway WC2

Additional Demolition

January 2021


KEMBLE STREET

Contents

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1.0 Introduction and Background

The proposals, which are subject of this report, form part of the continuation of the wider consented proposals to extend and refurbish the commercial blocks and to improve its public realm. This report should be read in conjunction with Donald Insall Associates' report: ***Space House, 1 Kemble Street & 43-59 Kingsway WC2B 6TE Historic Building Report and Heritage Views Impact Assessment*** (May 2019), which supported the works granted permission/consent in November 2019 by applications Ref. No: 2019/2773/P and Ref. No: 2019/2790/L.

The report of 2019 made it clear that the approved proposals were considered to preserve the special architectural and historic interest of the listed building, which resides overwhelmingly in the principal external elevations of both the tower and Kingsway blocks. They were also considered to preserve the character and appearance of the Kingsway Conservation Area, of which the Kingsway block forms a part, and improve views from additional adjacent conservation areas.

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. Overall, the wider consented scheme offers substantial public benefits which would outweigh any perceived 'less than substantial harm', therefore meeting the tests within the National Planning Policy Framework (2019) for sustainable development, insofar as these relate to the historic environment. The building's optimum viable use as a commercial complex – a key part of its significance as outlined by the building's list description – would be maintained, and the proposed scheme would also accord with the relevant policies of the NPPF, and with Camden Council's local policies regarding the historic environment.

This report is to support an application for Planning Permission and Listed Building Consent, to seek permission for areas of demolition internally, in addition to those areas already consented. The application also includes demolition to allow for amendments to the UKPN substation and the link bridge roof. These works and demolitions are to facilitate future proposals that are to be submitted as part of a Section 73 and Section 19 application in due course. The planning and listed building consent application for demolition is being submitting separately from the Section 73 and 19 application to ensure that the construction programme can remain on target. The proposals forming the aforementioned Section 73 and 19 application have been discussed with Camden at pre-application meetings held on 25 June 2020 (ref:2020/2733/NEW) and on the 15th September 2020 (ref:2020/4002/PRE). Although this present application sees an increase in the area of demolition, the forthcoming Section 73 and 19 application will notably result in the reduction in the overall amount of demolition. This later application will include the retention of an increased amount of fabric, particularly office floor plates on floors 2, 4-7 and 9-14, and overall, the amount of fabric to be demolished will be reduced. The exact areas are included in Squire and Partners' report.

The areas of demolition and the amendments to the UKPN substation that this report addresses were presented to Camden at the above pre-application meetings, although the areas of demolition have been refined.

2.0 Description of the Proposals and their Impact on the Listed Building

The proposals are described in the documents by Squire and Partners Architects, which includes a report dated January 2021 and the drawings, which accompany this application. Below is a summary description of the proposals; a description of their implications for the historic fabric is set out in italics.

2.1 Proposals for Demolition

External

UKPN Substation

As discussed during previous pre-application meetings the UKPN substation, located on the west Kingsway elevation at ground level, requires upgrading into a twin substation in order to provide sufficient power for the new development. This application is just for the demolition works required to facilitate the larger area of ventilation required for the proposed substation. The final design of the substation has not yet been finalised, requiring further input from UKPN. The final design details will be submitted to Camden via Condition 3LBC I.

Proposals include demolition of areas of the ground floor elevation and mezzanine slab to the west elevation of the Kingsway block, the removal of brickwork and the louvres to the west façade and the windows at mezzanine level above the substation. Areas of brick would also be removed at high level between the tapered, Y-shaped concrete pilotis that encircle a recessed ground floor of the Tower; here louvers would be inserted.

This area of the Kingsway building, on the west façade at street level, is utilitarian and formed of brick and louvered areas. This area has been altered as part of its use as a UKPN substation and is of no historical or architectural interest. The loss of fabric in this area would have no impact on the special interest of the listed building. The west elevation forms the western boundary of the Kingsway Conservation Area and so demolition in this area would have a very limited impact on the conservation area and no impact on its significance. The areas of demolition proposed to the Tower would see the loss of original brick however, once again this recessed area is utilitarian and of no particular interest in isolation. Furthermore, the proposed louvres would be located in a recessed position, allowing the Y-shaped pilotis to remain prominent and their form unimpeded.

Link Bridge Roof

Investigations into the structural stability of the link bridge roof has established that it is only able to take a light load, for example for maintenance purposes only. This does not therefore support the consented use as a terrace. The proposal is thus to demolish the existing weak slab and replace with a new slab.

The link bridge roof appears to be original material and the loss of the slab would result in the loss of a small amount of historic fabric. However, this fabric does not form part of the special interest of the listed building. In terms of design, the new slab would not increase the height of the link bridge. The detailed design of the link bridge will be including in the forth-coming Section 73 and 19 application.

Kingsway Windows

The windows to the north and south elevations of the Kingsway building would be removed.

As part of the consented proposals all of the windows were to be removed and replaced like for like; however the windows to the north and south elevations of the Kingsway building were left off the consented drawings and so this proposal sees this omission rectified. The proposals would result in the loss of some historic fabric however, the new replacement windows would be like for like in design and would, in turn, facilitate the upgrading of the office building to the highest standard, including ensuring it is more environmentally sustainable.

Internal

Demolition is proposed on a number of floors, as demonstrated in the accompanying drawings. Demolition includes penetrations through structural slabs and walls and the removal of walls and areas of slab. This is particularly at basement level 1 and at mezzanine level. During further investigations, following the departure of the previous tenant, areas have been found at mezzanine level within the tower and Kingsway building that were not previously known about, hence the proposals.

The proposals would see the loss of original fabric, however on balance this fabric is in the form of masonry slab and walls and are not elements that are of architectural or design interest and are not elements that contribute to the special interest of the listed building. This special interest lies predominately in the sculptural and principal external façades of the Tower and Kingsway block, as well as in the building's optimal viable use as a commercial complex.

3.0 Summary Justification and Conclusion

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan applicable to the site comprises the Camden Local Development Plan, 2017. Decision-makers must also comply with the Planning (Listed Buildings and Conservation Areas) Act requirements.

This section first assesses the proposals first against Camden's Local Plan before bringing to bear the requirements of the Planning (Listed Buildings and Conservation Areas) Act and the heritage policies in the NPPF.

The relevant Camden policies are:

'POLICY D2 HERITAGE: The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets **[...]**.'

Policy D2 notes that *'the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.*

In regards to conservation areas development is required to *'preserve or, where possible, enhances the character or appearance of the area'*. Equally, to '*preserve or enhance the borough's listed buildings, the Council will: i. resist the total or substantial demolition of a listed building; j. resist proposals for a* change of use or alterations and extensions to a *listed building where this would cause harm to the special architectural and historic interest of the building; and k. resist development that would cause harm to significance of a listed building through an effect on its setting.'*

Addressing these policies the proposals for demolition both external and internally, as set out above, would preserve the special architectural and historic interest of the listed building, which lies overwhelmingly in its sculptural form and external elevations and in its use as a commercial complex of offices.

The relevant regional policies of the Greater London Authority are:

Policy 7.8: Heritage Assets and Archaeology
Strategic

A. London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

Planning decisions

C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

Addressing these policies, the proposed areas of demolition would mean the heritage asset would be sustained but the proposals would not directly enhance the significance of the listed building. However, the areas of demolition set out in the proposals are required to ensure the construction programme remains on target and to facilitate a future Section 73 and 19 Application. This forth-coming application would continue the efforts of the consented scheme to upgrade the office buildings to provide the highest quality of commercial accommodation, and would continue to support the optimum viable use of the listed building. It would also see the retention of fabric previously consented for demolition, resulting in less demolition overall with the proposals of a less invasive nature.

Turning to the Planning (Listed Buildings and Conservation Areas) Act 1990 and Section 16 of the Act which expects there to be *special regard* (paid) *to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*

The demolition works are in areas that are less sensitive or that have already been altered and are not of significant architectural or historic interest. The works would have no impact on and would therefore preserve the features of special architectural and historic interest, in this case the sculptural forms of the two blocks and their principal elevations and the buildings' optimum viable use, which is what the law requires.

Finally turning to the National Planning Policy Framework the proposals would result in the loss of some original fabric in the form of masonry slab, brick and windows as indicated in the plans. This would, in terms of the NPPF, cause some minor and 'less than substantial harm'.

However, this harm is balanced by the fact that the areas of demolition are in areas of lesser significance, and those that do not contribute to the building's special interest. Furthermore, following this application will be a Section 73 and 19 application that will see an overall reduction in the amount of demolition required when compared to the consented scheme, meaning that more original fabric will be preserved. For example as much of the ground floor slab as possible, between the Tower and Kingsway building, would be retained, as well as areas of the office floor plate on floors 2, 4-7 and 9-14, as part of the proposals. The replacement of the fenestration would see more environmentally sustainable windows installed but to the original designs, this would preserve the significant architectural design but has benefits in terms of sustainability.

Overall the proposals would help contribute to the viability of the consented scheme proposals and those new proposals that will be submitted as part of the forthcoming Section 73 and 19 application which would continue to offer public and heritage benefits that are considered to balance the less than substantial harm which would fall out of them. Furthermore, none of the proposals would cause any harm to the character and appearance of the Kingsway Conservation Area.

For the reasons explained above, it is considered that the proposed works would preserve the special interest of the listed building and the conservation area in accordance with Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act. The proposals would comply with the policy of the NPPF and all other relevant strategic policies of the Camden's Local Plan, notably D2 Heritage and the London Plan (2016) Policy 7.8 insofar as they relate to the historic environment.

Donald Insall Associates