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25 January 2021

Our ref: LJW/AKG/KFO/U0006860

**Your ref: 2019/2773/P & 2019/2790/L //
2020/2733/PRE & 2020/4002/PRE**

Dear Laura and Rose,

**Space House, 1 Kemble Street and 43-59 Kingsway, London, WC2B 4TE
Application for Full Planning Permission and Listed Building Consent**

Further to the receipt of planning permission and listed building consent at Space House, 1 Kemble Street and 43-59 Kingsway, London, WC2B 4TS ('the site'), dated 26 November 2019 (refs: 2019/2773/P and 2019/2790/L), and the subsequent pre-application meetings held in June and September 2020 (refs: 2020/2733/PRE and 2020/4002/PRE) we write on behalf of our client, SLQR Trustee No.1 Limited SLQR Trustee No.2 Limited as co-trustees of SQLR Trustee No.3, to submit an application for planning permission and listed building consent at the site for demolition works.

Background

The demolition works for which planning permission and listed building consent are sought under these applications are being bought forward in order to allow the applicant's demolition contractors (Erith) to maintain their programme on site. The demolition works proposed are the result of detailed design development which seeks to improve the design, safety, function and operation of the completed development whilst also continuing to ensure that the special interest of the Grade II listed building is preserved and enhanced.

Originally it was envisaged that the works would form part of the forthcoming minor material amendment applications to the extant planning permission and listed building consent at the site and the majority have been discussed with Camden's planning and conservation officers previously as part of wider pre-application discussions (refs: 2020/2733/NEW and 2020/4002/PRE) associated with the forthcoming amendment applications (submission targeted for late February 2021), however permission for the works is now required sooner in order to maintain the demolition programme on site.

Proposals

Accordingly, these applications seek permission for the following works:

Planning Permission: **“Removal and like for like replacement of windows to the north and south of the Kingsway building, removal of link bridge roof, reconfiguration of the UKPN façade to the Kingsway block and removal of brickwork and replacement with louvres to the Tower UKPN substation.”**

Listed Building Consent: **“External: Removal and like for like replacement of windows to the north and south of the Kingsway block, removal of link bridge roof, reconfiguration of the UKPN façade to the Kingsway building and removal of brickwork and replacement with louvres to the Tower UKPN substation. Internal: removal of walls and sections of slabs at mezzanine levels to both the Tower and Kingsway buildings and creation of new penetrations through the structural slabs and walls at lower and upper basement, ground, mezzanine, first, third, fifth, eighth and fifteenth floor levels.”**

Site and Surroundings

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.

Space House became Grade II listed in 2015, but certain, largely internal, elements of the Site are not included within the listing and as such are not granted the same level of protection as the rest of the built fabric at the Site. The rectangular block facing Kingsway is located within the Kingsway Conservation Area, whilst 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.

Recent Planning History

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

“Removal of existing roof plant equipment at 1 Kemble Street and erection of a single storey facsimile floor plus one setback floor; removal of roof plant from 43-59 Kingsway and erection of a single storey set-back extension; removal and replacement of the glazing to the existing enclosure of the southern external stair on Kingsway and new glazing at ground floor level across the site; enclosing the redundant petrol filling station area with slimline glazing; 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 Class A1/A3 and flexible Class B1 office / Office and events space (sui generis) at part ground and basement levels.”

All pre-commencement planning conditions (nos. 10, 14(a), 15 and 16) have been approved as have the pre-implementation obligations contained within the s106 which required the submission and approval of documentation. The applicant has made significant financial commitment to reach this stage of the project, working with Erith to establish pre-implementation activities as well as setting up and attending a Community Working Group, air quality monitoring and site registration as part of the wider development. It requires the approval of these demolition works to maintain programme on site.

The applicant is committed to the approved redevelopment scheme at the site. Implementation of the planning permission is scheduled for 1 March 2021.

Local Development Framework

The London Borough of Camden's Local Development Framework comprises of the following planning policy documents: The National Planning Policy Framework (2019), the London Plan (as amended, 2016) and the Camden Local Plan (2017).

Camden are finalising updates to several of their CPG documents.

Statutory Legislation

Statute regarding the heritage environment is relevant to this application. Both the site's historic fabric and the surrounding environment have been carefully considered in the development of the proposals having regard for the statutory legislation set out below.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that local planning authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when considering applications.

Section 72 of the same Act states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

National Planning Policy Framework

Under paragraph 189 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting. Paragraph 192 states that in determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

Where a development proposal will lead to a less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 195).

Planning Considerations

Heritage and Design

Camden Local Plan 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. In order to maintain the character of Camden's conservation areas the council will require that development within conservation areas preserves or, where possible,

enhances the character or appearance of the area. The Council will also resist development that would cause harm to significance of a listed building through an effect on its setting or would cause harm to its special architectural and historic interest.

As set out in the Design Document, prepared by Squire & Partners, this application seeks permission for the following works:

Planning permission and listed building consent:

- i. Removal of windows to the Kingsway building north and south elevations;
- ii. Removal of windows to mezzanine above Kingsway substation;
- iii. Removal of Kingsway substation west façade (brickwork, doors and louvres) for the upgraded UKPN substation;
- iv. Removal of high-level brickwork to Tower UKPN substation for new louvres; and
- v. Removal of the Link Bridge roof to allow for a stronger replacement slab.

Listed building consent only:

- i. New penetrations through structural slabs and walls at lower and upper basement, ground, mezzanine, first, third, fifth, eighth and fifteenth floor levels; and
- ii. Removal of walls and section of slabs at mezzanine levels to both the Tower and Kingsway.

The works shown in this application will lead to the removal of 1,363.7sqm of fabric, which equates to 520m³ cubic metres. The principle of demolition at the site has previously been agreed by Camden through the approval of the extant planning permission and listed building consent (refs: 2019/2773/P and 2019/2790/L). As part of the detailed design works, all of which will be bought forward in the forthcoming minor amendment applications at the site, there is an overall reduction in total demolition of listed fabric at the site which is considered a benefit of the proposals.

Internally, the areas to be demolished are not elements that are of architectural or design interest and are not elements that contribute to the special interest of the listed building. Pell Frishmann have reviewed the extent of the proposed internal demolitions and have confirmed that they would not affect the structural integrity of the building and are to be left in a stable structural condition prior to the introduction of and connection to any new proposed structure. The letter confirms that the works are generally in line with their structural demolition drawings approved under the extant permissions.

Externally, the applicant is seeking to obtain consent for the revised UKPN substation works at both the Kingsway building and the Tower as UKPN wish to begin this work in March 2021 in order to maintain programme. The works proposed are required by UKPN and are in areas that are less sensitive or that have already been altered and are not of special historic interest. The proposed drawings demonstrate the proposed resolved appearance of the UKPN facades. Details of the louvres are subject to condition 3 (part L), which is attached to the extant listed building consent. 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. Pre-application advice received following the meeting in June 2020 (ref: 2020/2733/PRE) stated that **“the openings appear more coherently arranged. The impact on significance is anticipated to be neutral.”**

The link bridge roof has been found to be only able to take light structural loads, ie. for maintenance purposes only. It is therefore proposed to demolish the existing weak slab and replace with a new slab. DIA have reviewed and have confirmed that this fabric does not form part of the special

interest of the listed building. The detailed design of the bridge link will be brought forward in the forthcoming amendment applications.

The windows to the north and south of the Kingsway block are also proposed to be removed and replaced like-for-like in terms of design. The removal of these windows was omitted from the demolition drawings approved under the extant permissions in error. Their inclusion in this application seeks to rectify this error.

DIA have reviewed the proposed external works and have concluded that they 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 principle elevations and the buildings' optimum viable use, which is what the law requires.

The works which comprise this application will assist in unlocking the public benefits to be delivered as part of the approved wider redevelopment proposals as they will ensure that the demolition programme is maintained. The public benefits of the wider redevelopment are:

- i. A contribution to the regeneration and transformation of the area;
- ii. Sustainable reuse and regeneration of buildings which no longer meets modern office user requirements;
- iii. Delivering sustainable development through improvements in energy efficiency;
- iv. High quality design, contributing to the wider townscape and conservation area setting and local streetscene;
- v. Contributing to the function and character of the area through the provision of new active public uses at ground floor level to reactivate street frontages;
- vi. Enhanced public realm with vibrant and active frontages;
- vii. Refurbishment of two listed buildings to ensure their longevity and vitality;
- viii. Contextual, high quality extensions to both buildings to provide new class B1 office floorspace;
- ix. Removal of car parking and provision of cycle parking and end of journey facilities in accordance with the draft London Plan; and
- x. Removal of unsightly rooftop plant visible in long views and provision of energy efficient plant and sustainability features within a plant enclosure.

Therefore, the works are considered to meet the statutory tests and the tests set out in paragraphs 192 and 195 of the NPPF. The principle of redevelopment has already been agreed at the site through the approval of the extant permissions. It has been demonstrated in this application that the works proposed are required to maintain the demolition/construction programme for the wider redevelopment and that the applicant is committed to delivering the wider development due to the work they have completed to date pursuant to the extant consents and their intention to implement on 1 March 2021. The internal works proposed will not affect the special character of the listed building as they do not affect areas covered by the listing description. The external works proposed are driven predominantly by UKPN requirements and resolved proposed designs have been submitted which show that the completed works would ensure that the special character and appearance of the listed building and the Kingsway Conservation Area would be preserved, in line with Local Plan Policy D2.

Other planning considerations

The works proposed under these applications will be carried out in accordance with the approved Construction Management Plan, prepared by Erith, dated 9 September 2020. The CMP was

approved on 23 September 2020 pursuant to Clause 4.2.1(b) of the s106 agreement associated with extant planning permission ref: 2019/2773/P, dated 26 November 2019.

Conclusion

The proposed demolition works will It is considered that the proposals represent a sensitive treatment of this site within the context of the listed building and will result in the preservation of its historical significance. The proposed demolition works will enable the construction of the proposals to commence on site thereby unlocking the public benefits to be delivered by the wider, approved scheme which will secure the long-term future of this site in its optimum viable use. The proposals will therefore contribute to and support the success of the approved development at the site and will preserve the character and appearance of the Kingsway Conservation Area.

The proposals comply with the required planning policy and meet the relevant statutory tests and therefore planning permission and listed building consent should be granted.

Application Documentation

Please find enclosed the following documents in support of these applications:

- Application forms and notices;
- Site Location Plan;
- Community Infrastructure Levy Form;
- Design Document, prepared by Squire & Partners;
- Structural Note, prepared by Pell Frischmann, dated 20 January 2021;
- Demolition Contractor Programme, prepared by Avison Young;
- Existing plan and elevation drawings, prepared by Squire & Partners;
- Demolition plan and elevation drawings, prepared by Squire & Partners; and
- Proposed plan and elevation drawings, prepared by Squire & Partners.

The requisite application fee (**£936**) for the application for planning permission has been paid online. There is no fee for the listed building consent application.

We look forward to your confirmation of the validation of this application. In the meantime, please contact Anna Gargan of this office should you have any questions.

Yours faithfully,



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