

Kings Keely Limited
November 2019



HERITAGE STATEMENT
KODAK HOUSE, 61 – 65 KINGSWAY

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Appendix 1

STATUTORY LIST DESCRIPTIONS

1.0 Introduction

- 1.1 This updated Heritage Statement has been prepared on behalf of Clearbell to assess the extant heritage value and potential capacity for adaptation of Kodak House, 61-65 Kingsway, London, WC2B 6TD. Kodak House is included on the Statutory List for Buildings of Architectural or Historic England. It is also located within the Kingsway Conservation Area.
- 1.2 This review includes a historic context section, which allows an assessment of the relative heritage value of the existing building on site, before the impact of the proposals is determined. This approach to heritage assessment is required in order to satisfy the provisions of Sections 16(2), 66(1) and 72 of the Planning (Listed Buildings & Conservation Areas) Act 1990 in relation to listed buildings, and the National Planning Policy Framework (NPPF) where the assessment of heritage assets or their settings is being considered (Paragraphs 184, 189 and 190).
- 1.3 This document has been prepared by Fiona Williams MA (Hons) MSc, Daniele Haynes BA (Hons) MSc (Heritage Consultant) and reviewed by Steven Handforth BA (Hons) MSc (Partner, Heritage)

2.0 Heritage Policy and Guidance Summary

National Policy

Planning (Listed Buildings & Conservation Areas) Act 1990

- 2.1 The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.
- Section 16(2) states “*In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State 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*”.
 - Section 66(1) reads: “*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State 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*”.
 - In relation to development within Conservation Areas, Section 72(1) reads: “*Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*”

National Planning Policy Framework (2019)

- 2.2 The revised National Planning Policy Framework (NPPF) was published on 19th February 2019, replacing the previous published 2012 and 2018 frameworks. With regard to the historic environment the over-arching aim of the policy remains in line with philosophy of the 2012 framework, namely that “*our historic environments... can better be cherished if their spirit of place thrives, rather than withers.*” The relevant policy is outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’.



- 2.3 This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a “*manner appropriate to their significance*” (Paragraph 184).
- 2.4 NPPF directs local planning authorities to require an applicant to “*describe the significance of any heritage assets affected, including any contribution made by their setting*” and the level of detailed assessment should be “*proportionate to the assets’ importance*” (Paragraph 189).
- 2.5 Paragraph 190 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, “*to avoid conflict between the heritage asset’s conservation and any aspect of the proposal*”. This paragraph therefore results in the need for an analysis of the impact of a proposed development on the asset’s relative significance, in the form of a Heritage Impact Assessment.
- 2.6 Paragraph 193 requires that “*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is*

irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

2.7 It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, “*clear and convincing justification*” (Paragraph 194). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to ‘wholly exceptional’ for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.

2.8 In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 195 states the following:

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site; and*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.”*

2.9 The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in “*less than substantial harm*”, paragraph 196 provides the following:

“Where a development proposal will lead to 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, where appropriate, securing its optimum viable use.”

2.10 It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.

2.11 In the case of non-designated heritage assets, Paragraph 197 requires a Local Planning Authority to make a “*balanced judgement*” having regard to the scale of any harm or loss and the significance of the heritage asset.

2.12 The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.

2.13 With regards to conservation areas and the settings of heritage assets, paragraph 200 requires Local Planning Authorities to look for opportunities for new development, enhancing or better revealing their significance. While it is noted that not all elements of a conservation Area will necessarily contribute to its significance, this paragraph states that “*proposals that preserve those elements of a setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably.*”

Planning Practice Guidance (PPG) (2019)

2.14 The Planning Practice Guidance (PPG) was updated on 23 July 2019 (replacing the previously-published in March 2014 version) and is a companion to the NPPF, replacing a large number of

foregoing Circulars and other supplementary guidance. It is planned that this document will be updated to reflect the revised NPPF in due course however the following guidance remains relevant.

- 2.15 In relation to non-designated heritage assets, the NPPG explains the following:
- 2.16 “Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.” (Paragraph: 039 Reference ID: 18a-039-20190723)
- 2.17 It goes on to clarify that: “A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.”
- 2.18 This statement explains the need to be judicious in the identification of value and the extent to which this should be applied as a material consideration and in accordance with Paragraph 197.

Historic England ‘Conservation Principles: Policies and Guidance’ 2008



- 2.19 Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of England’s historic environment, including changes affecting significant places. The guide sets out six high-level principles:
- “*The historic environment is a shared resource*”
 - *Everyone should be able to participate in sustaining the historic environment*
 - *Understanding the significance of places is vital*
 - *Significant places should be managed to sustain their values*
 - *Decisions about change must be reasonable, transparent and consistent*
 - *Documenting and learning from decisions is essential*”
- 2.20 ‘Significance’ lies at the core of these principles, the sum of all the heritage values attached to a place, be it a building, an archaeological site or a larger historic area such as a whole village or landscape. The document sets out how heritage values can be grouped into four categories:
- “**Evidential value:** *the potential of a place to yield evidence about past human activity*”
 - **Historic value:** *the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.*
 - **Aesthetic value:** *the ways in which people draw sensory and intellectual stimulation from a place*

- **Communal value:** *the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory*”.

2.21 It states that:

“New work or alteration to a significant place should normally be acceptable if:

- a. There is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;*
- b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;*
- c. the proposals aspire to a quality of design and execution which may be valued now and in the future;*
- d; the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future” (Page 58)*”.

Historic England Advice Note 12 Analysing Significance in Heritage Assets (October 2019)

- 1.1 This document provides guidance on the National Planning Policy Framework requirement for applicants to describe heritage significance in order to aid local planning authorities’ decision making. It reiterates the importance of understanding the significance of heritage assets, in advance of developing proposals. This advice note outlines a staged approach to decision-making in which assessing significance precedes the design and also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements.
- 1.2 The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. This advice also addresses how an analysis of heritage significance could be set out before discussing suggested structures for a statement of heritage significance.

Historic England Advice Note 2 ‘Making Changes to Heritage Assets’ (February 2016)

2.22 This document provides advice in relation to aspects of addition and alteration to heritage assets:

“The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting” (paragraph 41).

Historic England: Historic Environment Good Practice Advice (GPA) in Planning Note 2 ‘Managing Significance in Decision-Taking in the Historic Environment’ (March 2015)

2.23 This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the NPPF (NPPF) and the related guidance given in the National Planning Practice Guidance (NPPG). These include: *“assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering*

understanding, neglect and unauthorised works, marketing and design and distinctiveness” (para 1).

- 2.24 Paragraph 52 discusses ‘Opportunities to enhance assets, their settings and local distinctiveness’ that encourages development: *“Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation”.*

Historic England The Setting of Heritage Assets Historic Environment Good Practice Advice (GPA) in Planning (second Edition) Note 3 (December 2017)

- 2.25 This document presents guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas and landscapes. It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets.
- 2.26 Page 2, states that *“the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.”*
- 2.27 The document goes on to set out ‘A staged approach to proportionate decision taking’ provides detailed advice on assessing the implications of development proposals and recommends the following broad approach to assessment, undertaken as a series of steps that apply equally to complex or more straightforward cases:
- *“Step 1 - identify which heritage assets and their settings are affected;*
 - *Step 2 - Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;*
 - *Step 3 - assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;*
 - *Step 4 - explore ways to maximise enhancement and avoid or minimizing harm;*
 - *Step 5 - make and document the decision and monitor outcomes.”* (page 8)

Regional Policy

The London Plan: The Spatial Development Strategy for London consolidated with alterations since 2011 (2016)

- 2.28 The London Plan sets out the overall strategic plan for the development of London until 2036. The document was published in March 2016. The most relevant policies are as follows:
- 2.29 Policy 7.4 Local Character:

“Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features. In areas of poor or ill-defined character,

development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Buildings, streets and open spaces should provide a high quality design response that:

- has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
- contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
- is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings.
- allows existing buildings and structures that make a positive contribution to the character or a place to influence the future character of the area
- is informed by the surrounding historic environment”.

2.30 Policy 7.6 Architecture:

“Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. Buildings and structures should:

- be of the highest architectural quality
- be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- comprise details and materials that complement, not necessarily replicate, the local architectural character
- not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings.
- incorporate best practice in resource management and climate change mitigation and adaption
- provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- be adaptable to different activities and land uses, particularly at ground level
- meet the principles of inclusive design
- optimise the potential of sites”

Local Policy

Camden Local Plan (2017)

2.31 The Camden Local Plan (2017) outlines plans for development and forms the basis for planning decisions in the borough. The document was adopted by the council on the 3rd July 2017 and replaces the Core Strategy and Camden Development Policies documents. The relevant policies are set out within this document are:

2.32 Policy D1: Design

“The Council will seek to secure high quality design in development. The Council will require that development :

- a) respects local context and character;

- b) preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;...”

2.33 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.

Designated heritage assets

Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) *the nature of the heritage asset prevents all reasonable uses of the site;*
- b) *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c) *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d) *the harm or loss is outweighed by the benefit of bringing the site back into use.*

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.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. In order to maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:

- e) *require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- f) *resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- g) *resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- h) *preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden’s architectural heritage.*

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. 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...*

Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset."

Kingsway Conservation Area

- 2.34 The Kingsway Conservation Area was first designated in June 1981. The current Conservation Area Appraisal was formally adopted by the council in December 2001.
- 2.35 Within the Conservation Area Appraisal, there are detailed policies which have been linked with relevant Unitary Development Plan (UDP) policies. It must be noted that the UDP has since been superseded by the Camden Local Plan (2017). However the following policies contained within the Kingsway Conservation Area Appraisal are still considered to hold some weight:
- 2.36 Policy EN33
"the Council will seek to ensure that development in a conservation area preserves or enhances its special character and appearance and is designed to harmonise with the established character of the area. Applicants will be expected to provide sufficient information about the proposed development and its immediate setting which may include the preparation of montage studies, to enable the Council to assess the potential effect of the proposal on the character and appearance of the conservation area."
- 2.37 The Conservation Area Appraisal contains the following guidance which are considered to be of relevance:
- 2.38 Listed Buildings
- *"Under Section 7 of the Planning (Listed Buildings & Conservation Areas) Act 1990, listed building consent is required for demolition of a listed building, and for any works of alteration or extension which would affect its character as a building of special architectural or historic interest. Even cleaning or repainting a facade may require listed building consent. The requirement for listed building consent is distinct from the need for planning permission and 'permitted development' rights do not apply to listed building consent."*
 - *"Listed building consent is not normally required for maintenance and like for like repairs but, if repairs result in a significant loss of historic fabric or change to the appearance of the building, consent would be required."*
 - *"It is an offence to carry out or ask for unauthorised works to be carried out to a listed building and the penalty can be severe - an unlimited fine or up to 12 months imprisonment, or both."*
- 2.39 Materials and Maintenance

- *“In all cases, existing/original architectural features and detailing characteristic of the Conservation Area should be retained and kept in good repair, and only be replaced when there is no alternative, or to enhance the appearance of the building through the restoration of missing features. Original detailing such as door/window pediments and finials, timber shopfront facades, iron balustrades, timber framed sash windows, doors, where retained add to the visual interest of properties, and where removed in the past replacement with suitable copies will be encouraged. Where replacement materials are to be used it is advisable to consult with the Council’s Conservation & Urban Design Team, to ensure appropriate choice and use. Original, traditional materials should be retained wherever possible and repaired if necessary.”*
- *“The choice of materials in new work will be most important and will be the subject of control by the Council.”*
- *“Generally routine and regular maintenance such as unblocking of gutters and rainwater pipes, the repair of damaged pointing, and the painting and repair of wood and metal work will prolong the life of a building and prevent unnecessary decay and damage. Where replacement is the only possible option, materials should be chosen to closely match the original. Generally the use of the original (or as similar as possible) natural materials will be required, and the use of materials such as concrete roof tiles, artificial slate and UPVC windows would not be acceptable.”*
- *“Original stonework and brickwork should not be painted, rendered or clad unless this was the original treatment. Such new work, whilst seldom necessary, can have an unfortunate and undesirable effect on the appearance of the building and Conservation Area. This may lead to long term structural and decorative damage, and may be extremely difficult (if not impossible) to reverse once completed. Re-pointing if done badly can also drastically alter the appearance of a building (especially when “fine gauge” brickwork is present), and may be difficult to reverse.”*
- *“Cleaning of buildings to make them look lighter should not normally be undertaken since it will involve the abrasive removal of the face of the brick or stone and can lead to problems due to water penetration. Some stone buildings cleaned for cosmetic reasons have then suffered much more serious damage due to corrosion of iron cramps connecting the stones. The cleaning of listed buildings may need listed building consent”*

3.0 Methodology

- 3.1 A heritage asset is defined within the NPPF as “a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).” (NPPF Annex 2: Glossary)
- 3.2 The significance of the heritage assets within the existing site requires assessment in order to provide a context for, and to determine the impact of, potential development proposals. Significance is defined as “the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.” (NPPF Annex 2: Glossary).
- 3.3 The aim of this Heritage Statement is to identify and assess any impacts that the proposed development may cause to the value or significance of surrounding heritage assets and/or their settings. Impact on that value or significance is determined by considering the sensitivity of the receptors identified and the magnitude of change.
- 3.4 Table 1 sets out thresholds of significance which reflect the hierarchy for national and local designations, based on established criteria for those designations. The Table provides a general framework for assessing levels of significance, but it does not seek to measure all aspects for which an asset may be valued – which may be judged by other aspects of merit, discussed in paragraphs 3.5 onwards.

Table 1 - Assessing heritage significance

Table 2 – Assessing heritage significance

SIGNIFICANCE	EXAMPLES
Very High	World Heritage Sites, Listed Buildings, Scheduled Monuments and Conservation Areas of outstanding quality, or assets of acknowledged international importance, or assets which can contribute to international research objectives. Registered Parks and Gardens and historic landscapes and townscapes of international sensitivity.
High	Listed Buildings, Conservation Areas and built heritage of excellent quality. Registered Parks and Gardens and historic landscapes and townscapes which are extremely well preserved with exceptional coherence, integrity, time-depth, or other critical factor(s).
Good	Scheduled Monuments, or assets of national quality and importance, or that can contribute to national research objectives. Listed Buildings, Conservation Areas with very strong character and integrity, other built heritage that can be shown to have good qualities in their fabric or historical association. Registered Parks and Gardens, Registered Battlefields and historic landscapes and townscapes of good level of interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
Medium/ Moderate	Listed Buildings, Conservation Areas, locally listed buildings and non-designated assets that can be shown to have moderate qualities in their fabric or historical association.

	Registered Parks and Gardens, Registered Battlefields, non-designated special historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	Assets compromised by poor preservation integrity and/or low original level of quality of low survival of contextual associations but with potential to contribute to local research objectives. Historic buildings or structures of low quality in their fabric or historical association. Locally-listed buildings and non-designated assets of low quality. Historic landscapes and townscapes with modest sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
Negligible	Historic buildings or structures which are of limited quality in their fabric or historical association. Historic landscapes and townscapes of limited sensitivity, historic integrity and/or limited survival of contextual associations.
Neutral/ None	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note. Landscapes and townscapes with no surviving legibility and/or contextual associations, or with no historic interest.

3.5 Beyond the criteria applied for national designation, the concept of value can extend more broadly to include an understanding of the heritage values a building or place may hold for its owners, the local community or other interest groups. These aspects of value do not readily fall into the criteria typically applied for designation and require a broader assessment of how a place may hold significance. In seeking to prompt broader assessments of value, Historic England's Conservation Principles categorises the potential areas of significance (including and beyond designated assets) under the following headings:

Evidential value – *'derives from the potential of a place to yield evidence about past human activity...Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them...The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.'* (Conservation Principles Page 28)

3.6 Evidential value therefore relates to the physical remains of a building/structure and its setting, including the potential for below ground remains, and what this primary source of evidence can tell us about the past.

Aesthetic Value – *'Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects... Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive'.* (Page 30-31)

3.7 Aesthetic value therefore relates to the visual qualities and characteristics of an asset (settlement site or building), long views, legibility of building form, character of elevations, roofscape, materials and fabric, and setting (including public and private views).

Historic Value – *'derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative... Association with a notable family, person, event, or movement gives historical value a particular resonance...The historical value of places depends upon both sound identification and direct*

experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value.' (Page 28-30)

- 3.8 Historic value therefore relates to the age and history of the asset, its development over time and the strength of its tie to a particular architectural period, person, place or event. It can also include the layout of a site, the plan form of a building and any features of special interest.

Communal Value – *“Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it... Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them... They may relate to an activity that is associated with the place, rather than with its physical fabric... Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there.”* (Page 31-32)

- 3.9 Communal value therefore relates to the role an asset plays in a historic setting, village, town or landscape context, and what it means to that place or that community. It is also linked to the use of a building, which is perhaps tied to a local industry or its social and/or spiritual connections.

- 3.10 Historic England's Conservation Principles also considers the contribution made by setting and context to the significance of a heritage asset.

- *“‘Setting’ is an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape.”*
- *“‘Context’ embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places.”* (Page 39)

- 3.11 In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations, but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.

4.0 Historic Context

- 4.1 The Kingsway area did not exist in its present form until the early 20th century. However, there is archaeological evidence suggesting Roman and Middle-Saxon occupation within the settlement of 'Lundenwic'. Following the abandonment of the settlement in the 9th century, the Kingsway area became a largely open space known as Purse Field. This can be seen below in John Norden's plan of Westminster (1593).



Figure 1 Extract from John Norden's plan of Westminster published in his *Speculum Britanniae* in 1593. The Kingsway area was undeveloped at this time. The approximate location of the site is marked in blue

- 4.2 The area remained largely undeveloped until the 17th century when a great deal of development occurred following the speculative construction of Great Queen Street by William Newton in the first half of the 17th century.

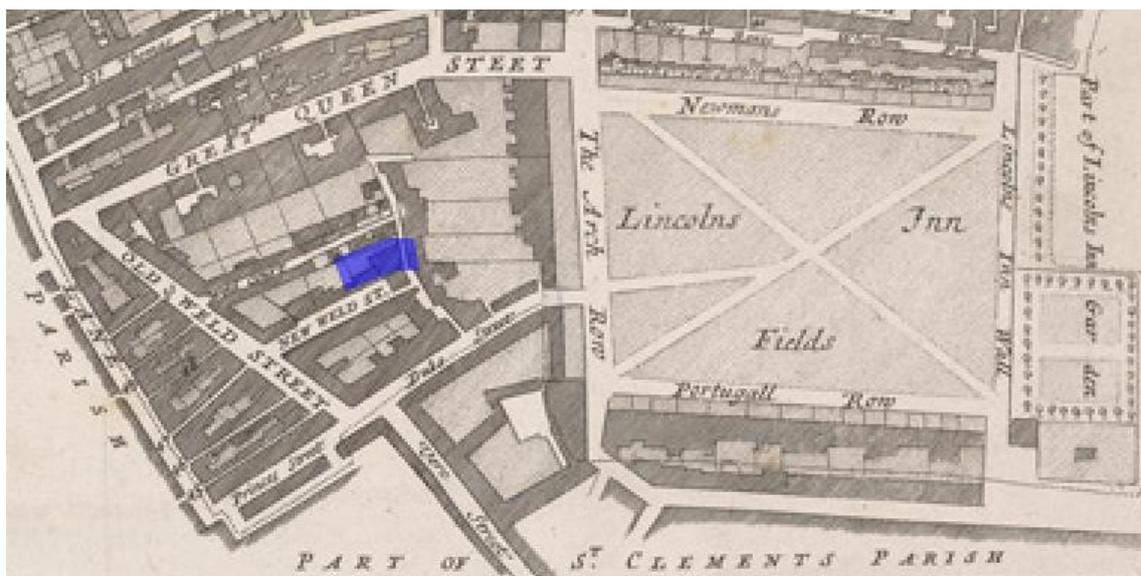


Figure 2 Extract from 'A Mapp of the Parish of St Giles's in the Fields' by Richard Blome, 1720. A great deal of development had occurred in the area by this time, with a very different street pattern to that found at present. The approximate location of the site is marked in blue

- 4.3 By the 19th century, area was intensely developed with a mix of institutional buildings as well as terraced houses. The densely populated area, was however, suffering from immense over population, poverty and crime.



Figure 3 Extract from Charles Goad's Insurance Plan of London Vol. VIII: sheet 192, dated 1888. The area was intensely developed by this date in a street pattern very different from the present. The approximate location of the site is marked in blue

- 4.4 With the creation of the London County Council (LCC) in 1889 the area underwent considerable redevelopment including the creation of a new road linking Vernon Place in the north and Aldwych (complete by 1905). The new road was called Kingsway and resulted in the demolition of the historic street pattern and the displacement of numerous residents.

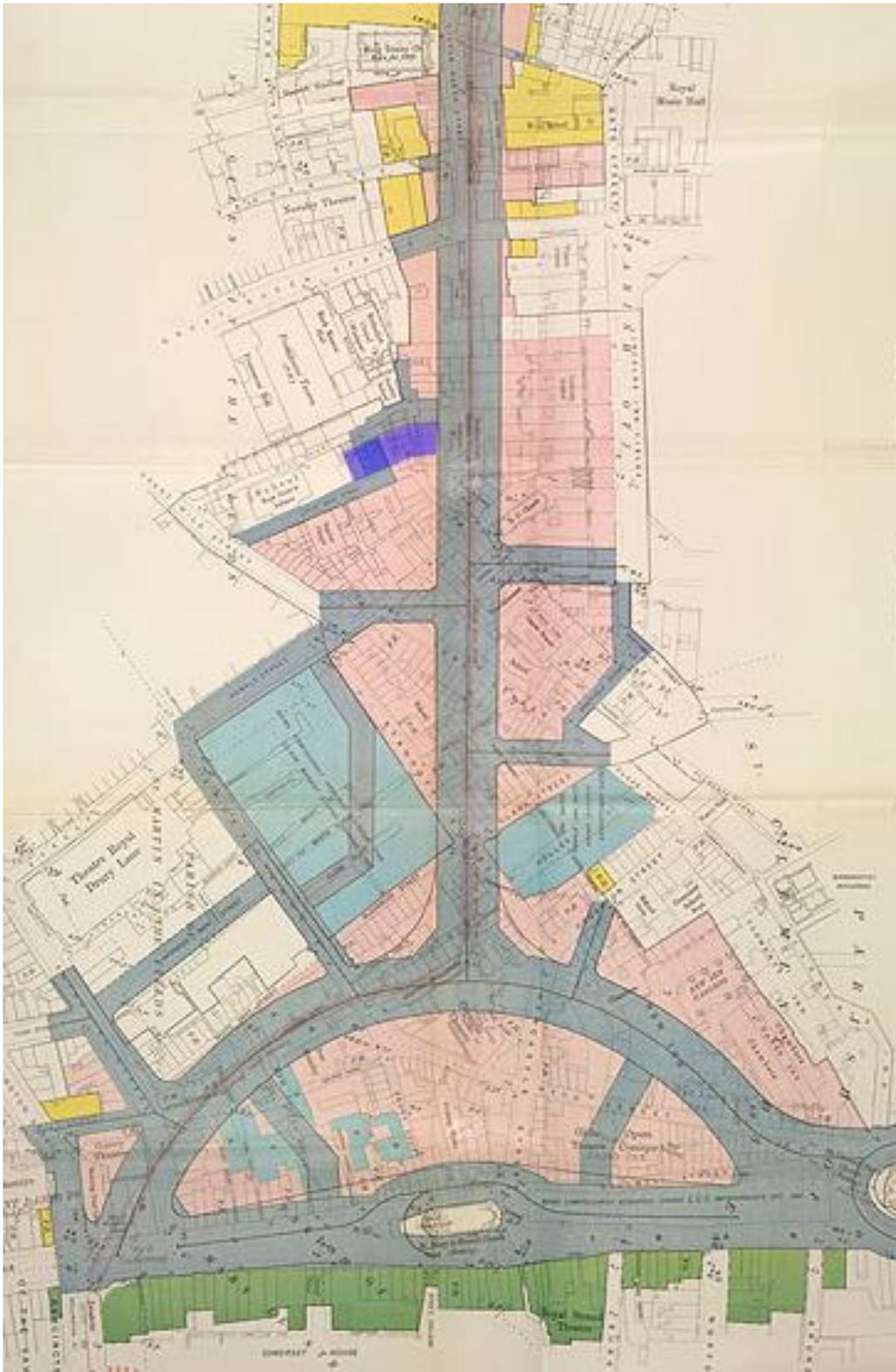


Figure 4 Extract from the Report of the Royal Commission on cross-river traffic in London showing Kingsway. The approximate location of the site is marked in dark blue.

- 4.5 The LCC created numerous development sites along Kingsway during this period including Kodak House.

5.0 Heritage Assets – Significance Assessment

- 5.1 This section identifies heritage assets which have a relationship with the site and may be affected by future proposals to alter or develop the site. The identification of these assets is consistent with '**Step 1**' of the GPA3 The Setting of Heritage Assets.
- 5.2 All relevant Statutory List descriptions for these designated assets can be found in **Appendix 1**.
- 5.3 In the case of this application, the following assets are located within the application site and may be affected by future proposals for the adaptation of the site:
1. Kodak House – Grade II Listed Building
 2. Kingsway Conservation Area

Kodak House

- 5.4 Kodak House was first added to the Statutory List for Buildings of Architectural or Historic Interest on 8th September 1971 at grade II.



Figure 5 View of Kodak House's Kingsway elevation (2019)

- 5.5 Kodak House is a 6-storey steel framed building with a basement and two a later attic additions dating to the 1920s and 1989s. The building was constructed on a cleared slum site in 1911 by Sir John Burnet and Partners (Thomas Tait was the project architect). Originally designed to be the European headquarters of the Kodak Company, when first built Kodak House also housed shops, offices, a warehouse, storerooms, dark rooms and printing rooms. Currently the building is vacant on the upper stories, with commercial shop use remaining at ground floor, not within the application site.
- 5.6 The building's exterior is of a simplified Edwardian Neo-Classical architectural style consistent with several of the buildings along Kingsway. The building is however notable for its early use of an open plan floor plate design, made possible through the use of encased steels. Drawing inspiration from American architecture the interiors were designed to have a paired back and restrained aesthetic.

- 5.7 The external façades to Keeley Street, Kingsway and Wild Court and are all differently treated, creating a deliberate hierarchy to the surrounds and emphasis on the Kingsway elevation. This is clad in Portland stone with a granite base. The Portland stone cladding wraps around the building extending for an additional three bays to Keeley Street as well as on the two corner elevations. This treatment is repeated on the elevation to Wild Court, using decorative bronze aprons between the floors to provide addition decorative relief. This gives way to red brick with stone banding to Keeley Street, and ceramic cream glazed brick to Wild Court. Surveys have revealed cracking to the stone and elevation surface. Repairs are needed in order to ensure no further degradation of external material and the loss of architectural detail of interest.



Figure 6 Kodak House 1915 (Collage)

- 5.8 The Kingsway elevation contains the principal entrance into the building, which is the most decorative feature within the external façades. The entrance is formed of a stone bolection moulded door surround, with a projecting scroll keystone, this is flanked by bronze torches.

Wrought iron gates are shown to have led into a marble vestibule and a timber multi-paned glazed doorway.



Figure 7 Mid-20th century photograph of the main entrance to Kodak House



Figure 8 View of the marble vestibule in 1972 (Source: Collage)



Figure 9 View of the main entrance to Kodak House (2019)

5.9 The entrances to the ground floor shops have been repositioned multiple times but have always provided access to Kingsway. Internal structural support is created through a series of steel columns, inserted at regular intervals throughout the building. While the character of most of the supports within the open plan floor plate is not known following the re-encasement of these uprights within cladding, it is noted that the plans differentiate between the decorative classical columns seen within the board room and lobby, from the supports within the open office area. This suggests a plainer character to the majority of the columns as well as a definitively square footprint, albeit of a comparable overall area. This reflects a hierarchy to the spaces within the floor plan.

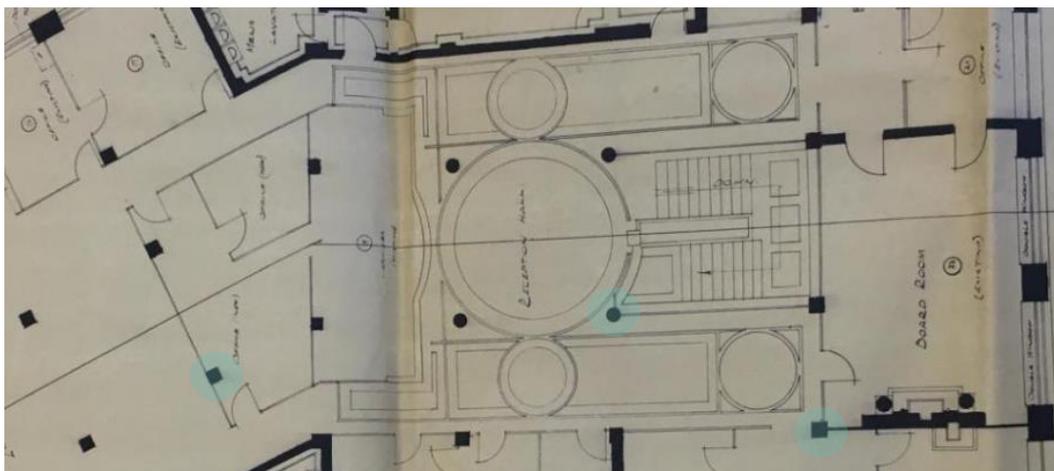


Figure 10. First floor plan, 1939. Note variation in plan form of supports, highlighted in blue.

- 5.10 The Keeley Street elevation is red brick with Portland stone detailing. Originally this elevation contained a secondary staff entrance positioned centrally as well as the entrance to the building's loading bay. The staff entrance is located within a simple stone surround with the lintel forming a projecting stone band running across the western half of the Keeley Street elevation. Above this band was a course of full height windows. The former loading bay entrance was located at the extreme western end of the building. This loading bay entrance was double height and featured a moulded stone surround, which does not project from the façade, unlike the main entrance on Kingsway. This loading bay entrance is now blocked, with later louvres installed across additional bays at ground level. This creates a haphazard and piecemeal appearance at odds with the otherwise considered architectural quality of the building.



Figure 11 View of the Keeley Street elevation in 1910

- 5.11 Since the building was constructed, two additional entrances have been inserted into the Keeley Street elevation, both within stone surrounds of a similar design to the original staff entrance but with modified details. The double height windows have been reduced in size with a thick band of stone inserted above them. The loading bay entrance was blocked in the 1980s using red brick and stone but lacking some of the detailing seen on the remainder of the elevation, the stone surround remains.



Figure 12 View of the Keeley Street elevation (2019). Note blocked secondary entrances.

- 5.12 The Wild Court elevation is similar to that of Keeley Street although this elevation features white glazed brick instead of red brick. The Wild Court elevation has undergone very little alteration, retaining the decorative banding.



Figure 13 View of the glazed brickwork on Wild Court (2019)

5.13

At 7th floor level, both the Keeley Street and Wild Court elevations feature lift overrun rooms positioned within “dormers” which project out from the roofline. These were both reconstructed in 1973, detracting from the original features of the elevations, though the presence of a projecting parapet on the Wild Court elevation lessens the visual impact. The lift room is more prominent on Keeley Street due in part to the curve of the building, façade’s materiality and lack of a projecting cornice.



Figure 14 View of Wild Court elevation, the lift overrun can just be seen but its presence is minimised by the projecting cornice and materiality of the elevation



Figure 15 View of Keeley Street elevation, the lift overrun is more prominent on this elevation

- 5.14 Between the upper floor windows across all the façades are bronze metal aprons whilst the first-floor windows are enclosed by Portland stone. The fenestration to the building originally featured multi-paned Crittal casements as can be seen in Figure 11. Today these have been completely replaced with modern units however. The ground floor shop windows have also all been altered.
- 5.15 In 1925 an additional structure to the roof was added. These works included the instillation of a bronze metal entablature to a portion of the existing parapet facing Kingsway. Bronze facing was common to buildings of this period, and is typical of extensions of this type. It is noted that the portion of the 1925 extension that sits on Keeley St and Wild Ct to the rear of the building, lacks the detail seen to the front in keeping with the overall hierarchy of the façades. This area is presently in poor condition and in need of repair.

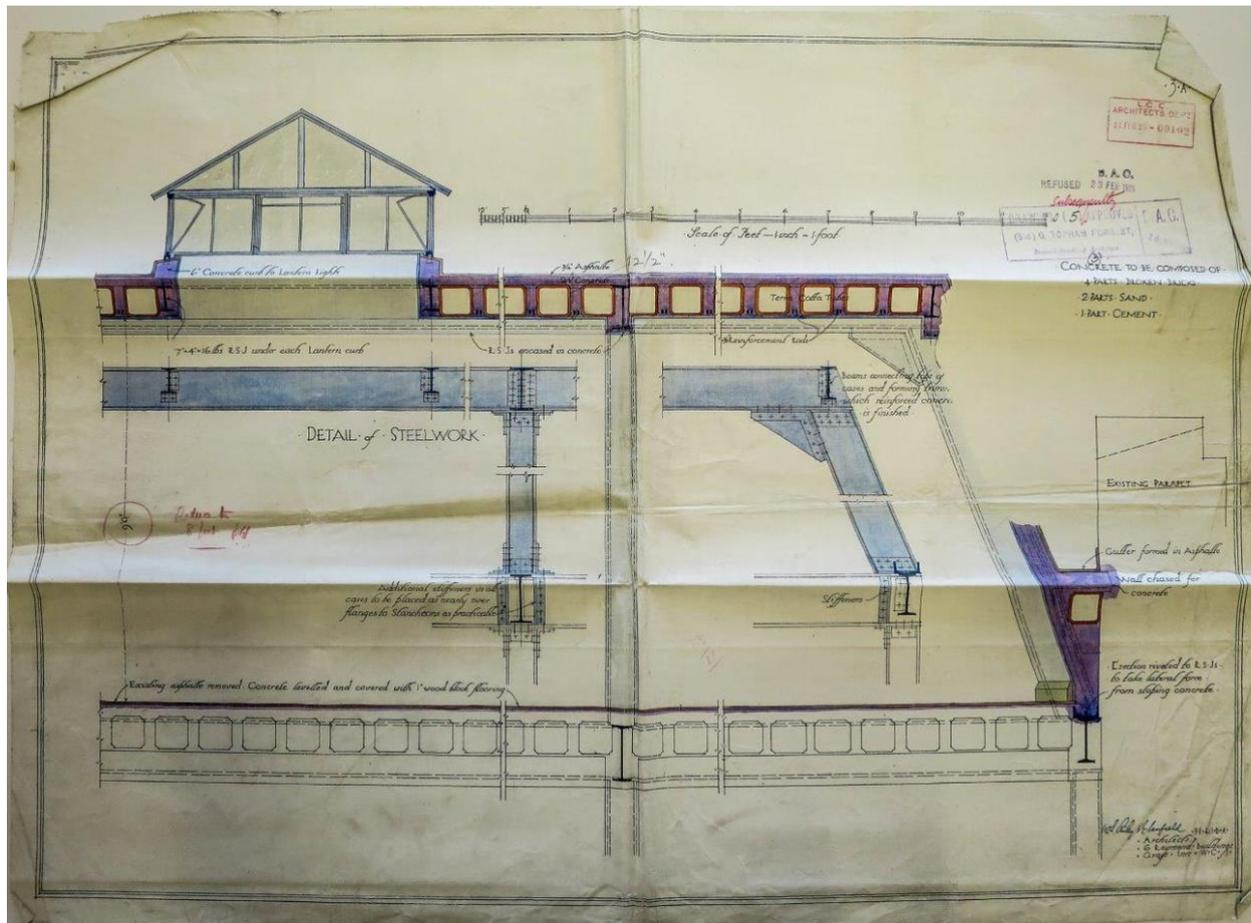


Figure 16. Addition of roof structure including metal entablature over existing parapet.

- 5.16 Internally the building has undergone numerous alterations to its plan form corresponding to changing requirements for the space and changing fashions. In addition to this, modern suspended ceilings and raised floors are prevalent throughout much of the building as well as the encasement of the remaining columns in substantial layers of cladding. In terms of original fabric, very little survives internally of note.



Figure 17 View of the 5th floor restaurant area in the mid-20th century. Note thickness of square column seen to the right of the image.



Figure 18 Typical interior of the upper floor office spaces (2019), there are no decorative features of interest, with columns encased in extensive layers of cladding. Note contrast in thickness between the columns seen to today to that of the historic photograph and shows within the plans.

- 5.17 Following late twentieth century redevelopment, the original volume and location of the first-floor boardroom has been lost, including removal of the Spanish mahogany panelling which can be seen in figure 19. The fireplace, its mantelpiece, hearth and its timber surround however appear to have survived, repositioned within the first floor and reoriented.



Figure 19 View of the first floor board room 1972 (collage)



Figure 20 The fireplace within the first floor boardroom 1972 (Collage)



Figure 21 View of the first floor looking east adjacent to the Keeley Street elevation (2019)



Figure 22 The first floor repositioned boardroom fireplace (2019)

5.18

The ground floor entrance hall and first floor lobby areas have retained a marble clad appearance; however comparison of historic photos and plans show the loss of the wall separating the ground floor hall from the shop floor area seen in photos from the 1970s (Figure 23). Comparison of these images also shows the replacement of the marble floor at first floor and removal of the original glazed screens to the board room and surrounding the reception area. Further alterations include the reorganisation of the plan form beyond the reception area. This space was once open plan, with a 'cashiers desk' partially separating the landing at first floor from the full extent of the main office. Screens and a toilet block were later introduced, enhancing the sense of enclosure in this area. It is possible that elements of the original balustrade to the stair were re-set within the modern partitions surrounding the lobby. It is also noted that reorganisation works resulted in the loss of the light fittings of interest.



Figure 23 Interior of the principal entry hall at ground floor level, 1972 (Collage. Note solid wall to the right of the stairs.

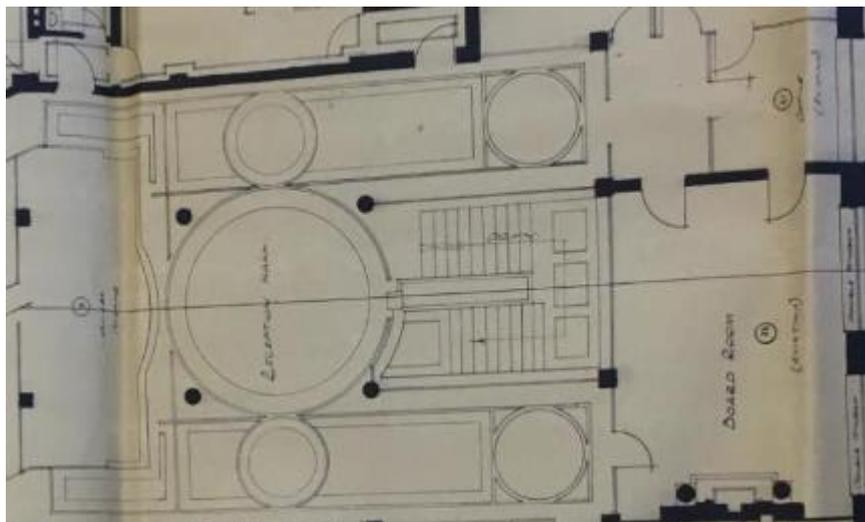


Figure 24. 1939 First floor ground plan. Note 'cashiers desk' to the left of the reception hall, suggesting this hall was not enclosed from the full expanse of the office floor to the left.

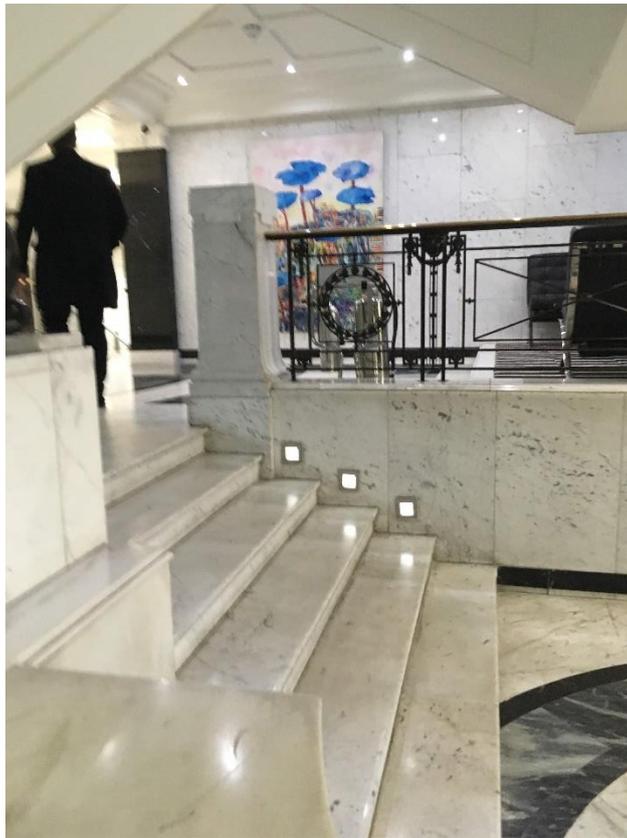


Figure 25. Interior of ground floor hall, showing loss of original wall which marked the boundary of the shop.



Figure 26 Interior of the principal entry hall at first floor level, 1972 (Collage). Note glazed screens to boardroom now removed.



Figure 27 View of the interior of the principal entry hall (2019)



Figure 28 The principal staircase (2019)



Figure 29 Interior of the principal entry hall at first floor level (2019). Note repositioned elements of the balustrade and modern glazed screening to the board room.

Planning History

- 5.19 There are numerous planning and drainage applications relating to alterations to Kodak House. The following planning applications have been included as they are considered to be of some relevance.
- 5.20 1910 application
The erection of a new building located on Kingsway

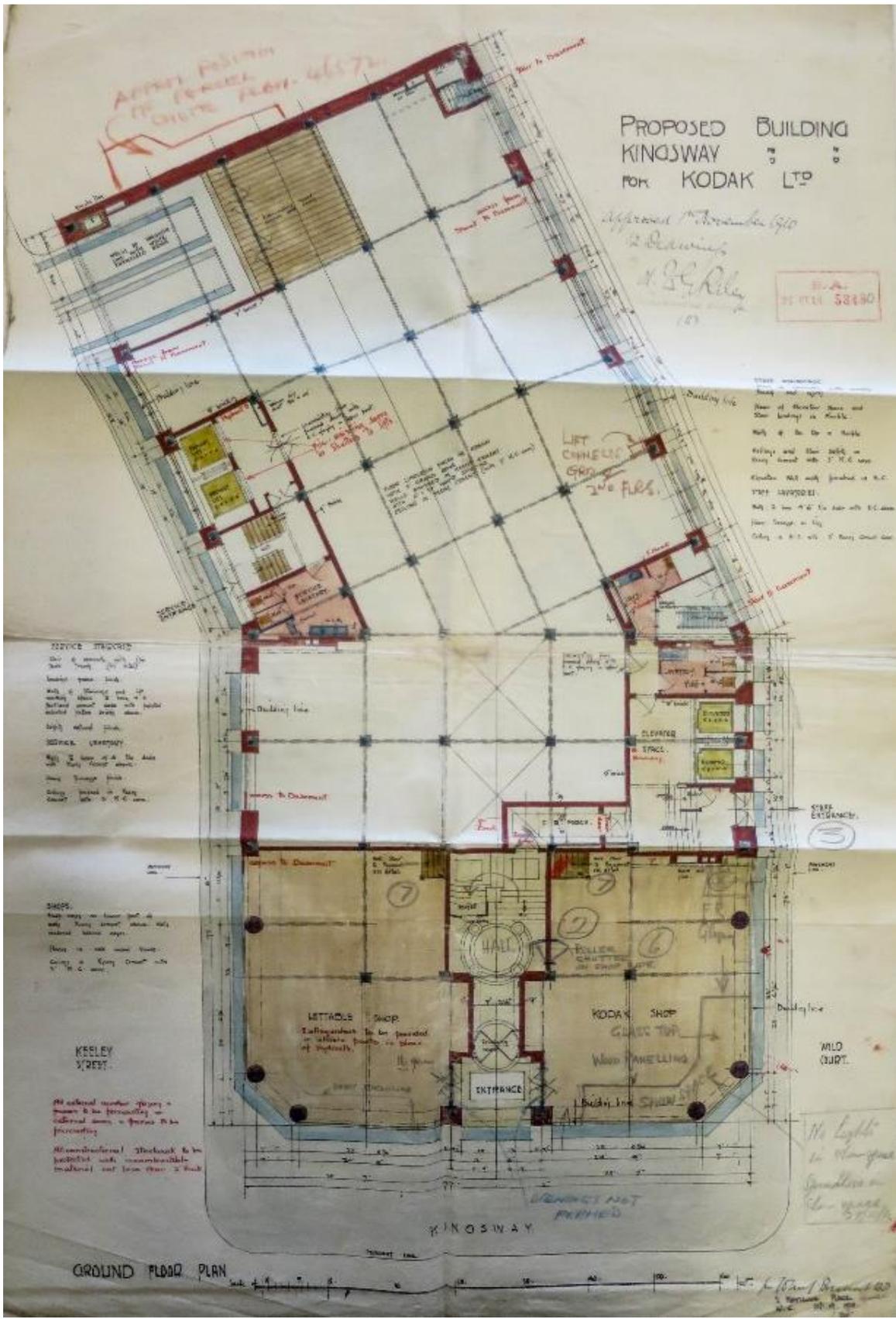


Figure 31 Extract from the 1910 application showing the proposed ground floor plan. Note enclosure to the right of steps leading up from the entrance hall.

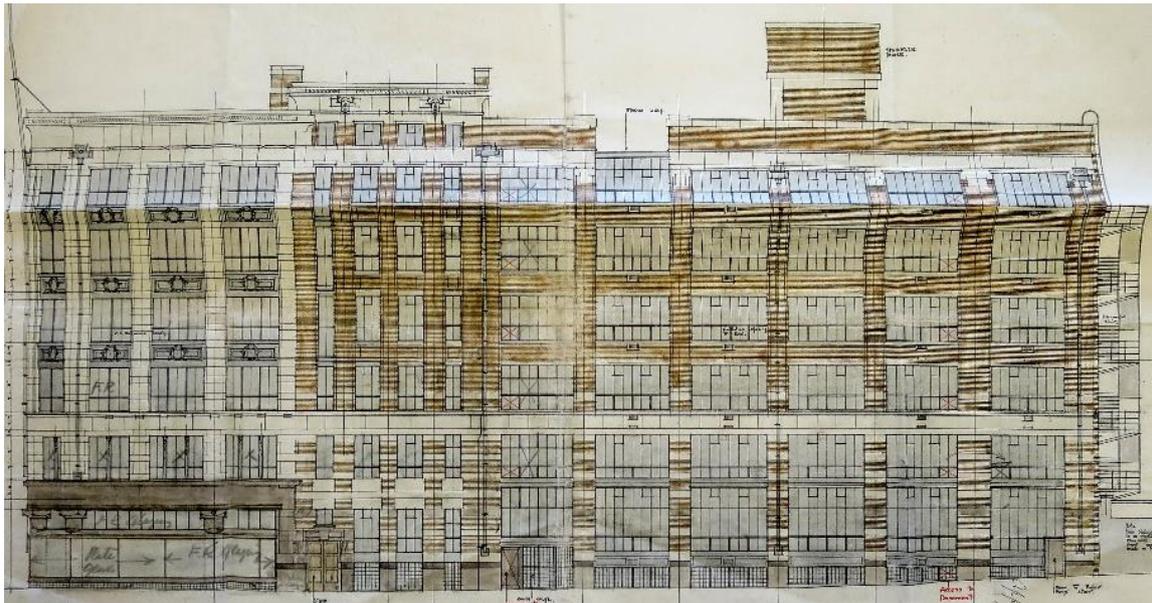


Figure 33 Extract from the 1910 application showing the proposed Kingsway and Keeley Street elevations (top) and the Wild Court elevation

5.21 Applications 8600977 and 8670207 – granted 3rd June 1986

The erection of an additional floor at 7th floor level as shown on drawing numbers B13219/15 16A 17-28 and drawing showing computer projection views revised by letter dated 24th July 1986.

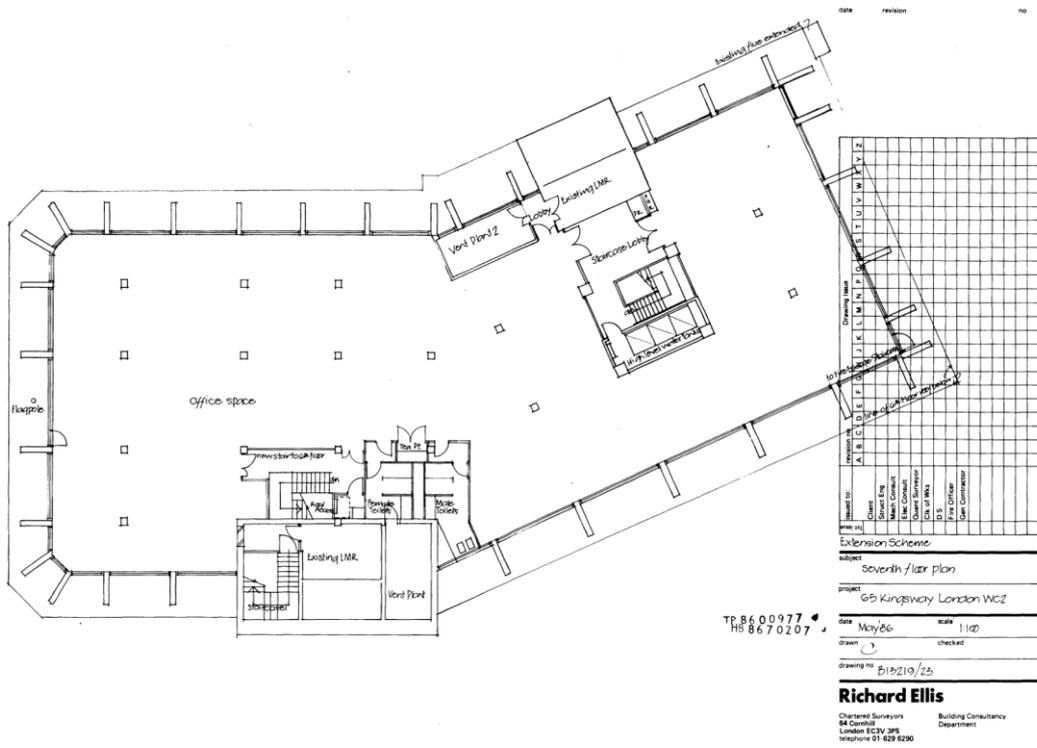


Figure 34 Extract from application 8670207 showing the proposed 7th floor plan

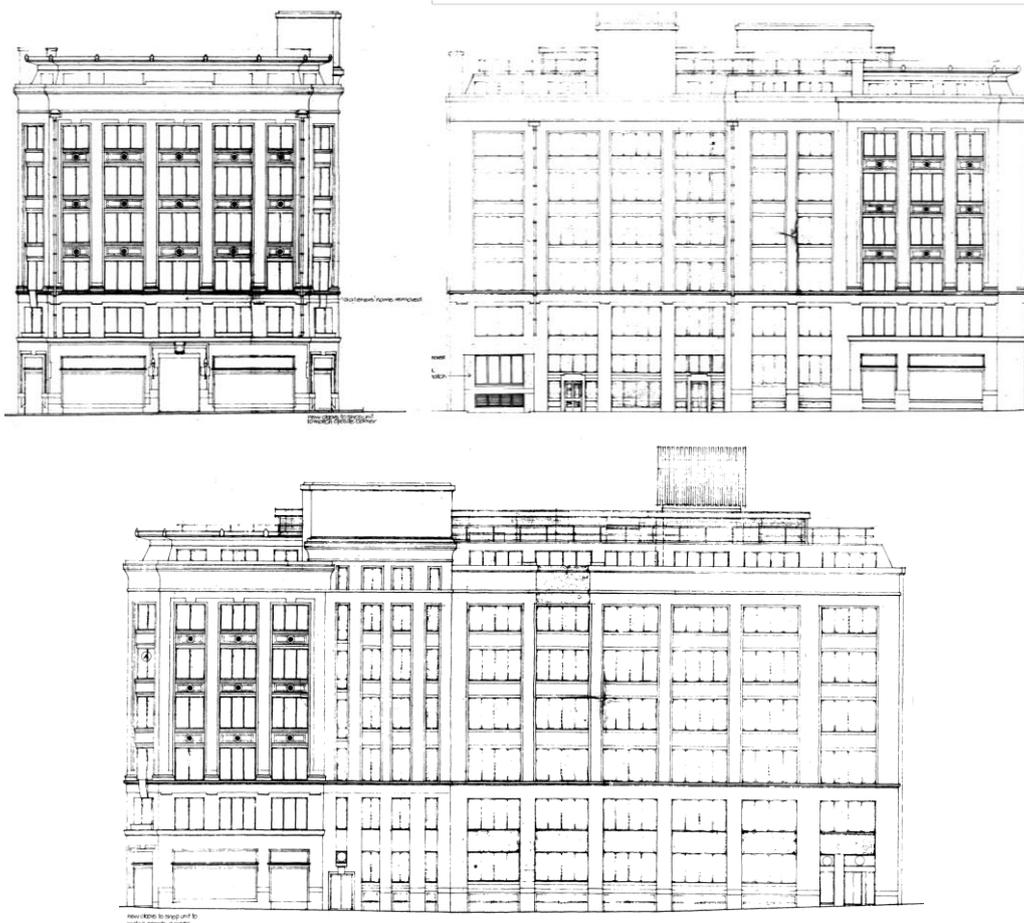


Figure 35 Extract from application 8670207 showing the proposed Kingsway and Keeley Street elevations (top) and the Wild Court elevation. Note additional lift overrun.

Conversion of a loading bay into office accommodation and the re-siting of an existing shop unit as shown on drawings numbered B13219/1 2A 3 4 5 6 7 8 and 10-14 revised by letter dated 11th June 1986.

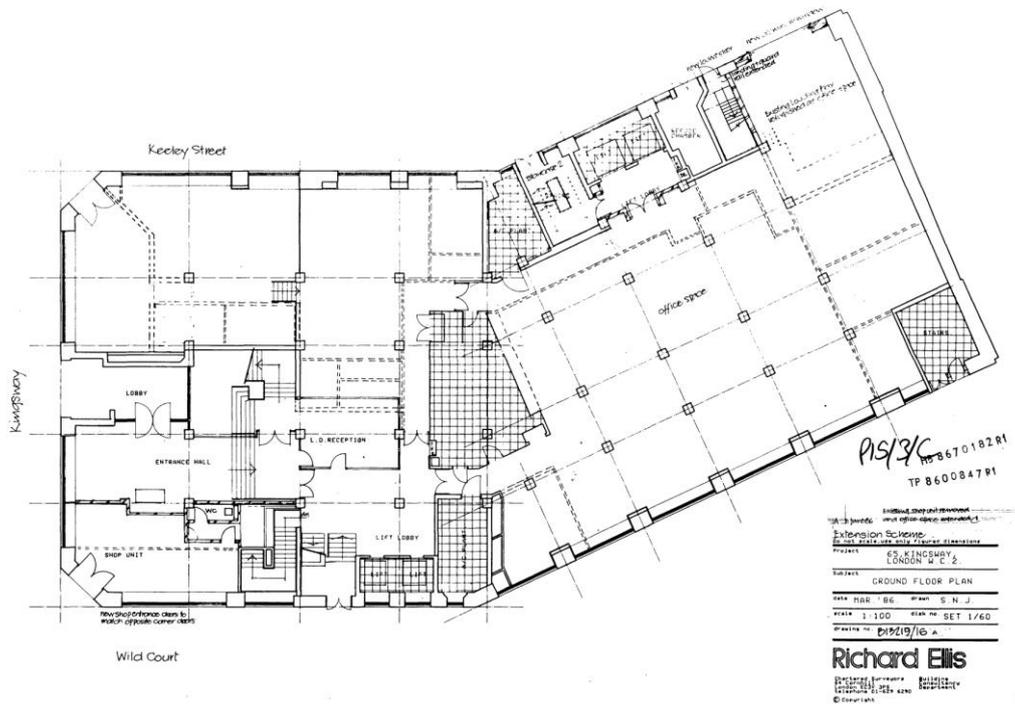


Figure 36 Extract from application 8600847 showing the proposed ground floor plan

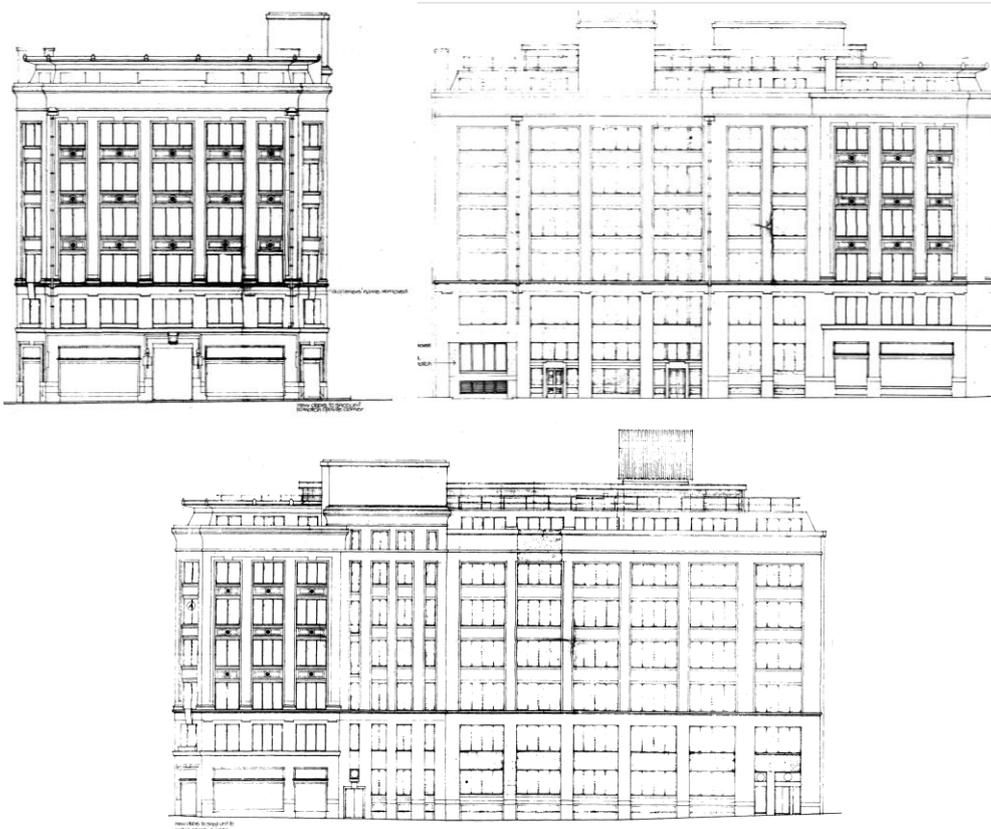


Figure 37 Extract from application 8600847 showing the proposed Kingsway and Keeley Street elevations (top) and the Wild Court elevation

5.23 Application 2015/2748/L – granted 15th July 2015

Internal refurbishment of existing offices at basement, ground, first and second floors. Including the removal of modern partition walls.

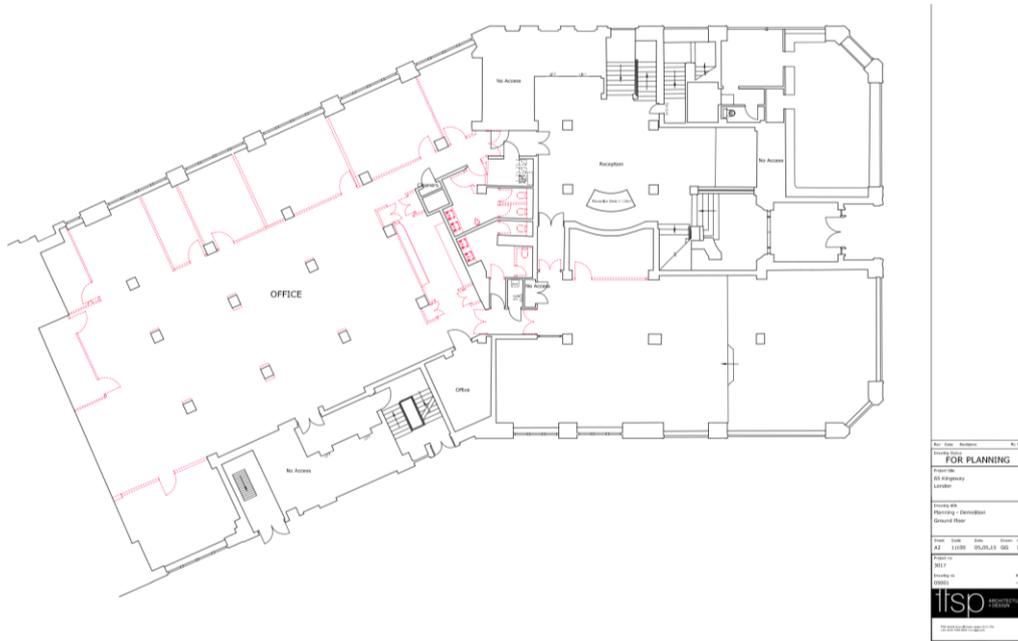


Figure 38 Extract from application 2015/2748/L showing the proposed ground floor demolition plan

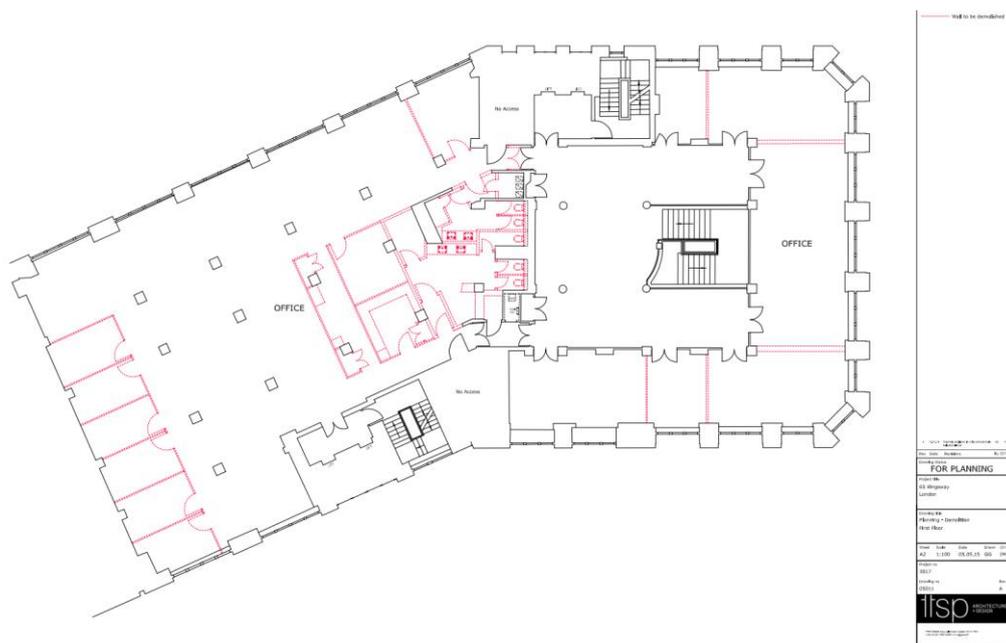


Figure 39 Extract from application 2015/2748/L showing the proposed first floor demolition plan

5.24 Applications 2015/4654/L and 2015/4096/P – granted 13th August 2015

Reinstatement of external door on south-east corner of building; provision of new entrance to basement on Keeley Street elevation and internal alterations in association with a change of use of part of ground floor and part of basement

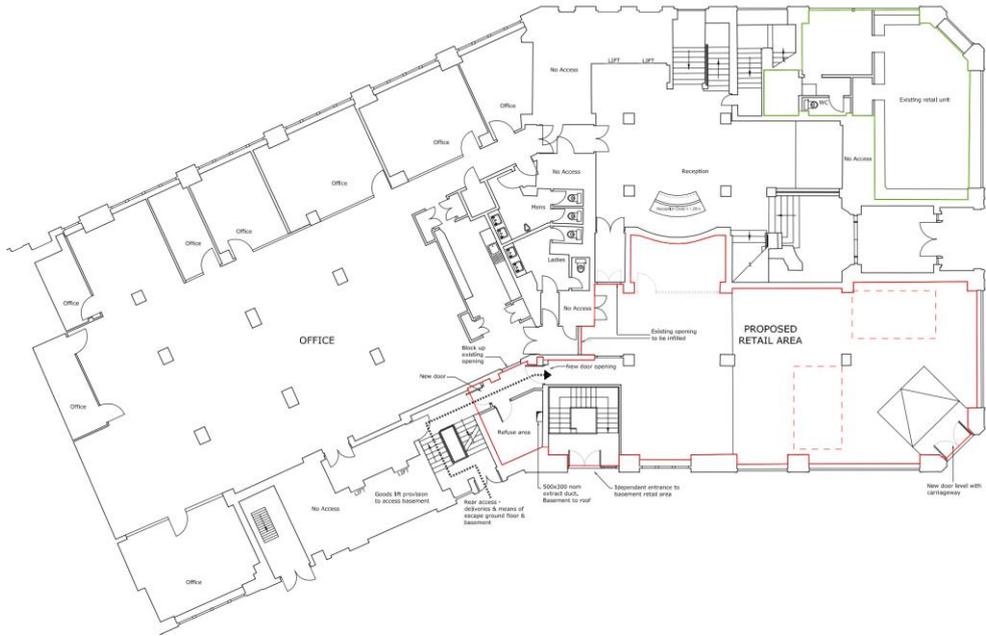


Figure 40 Extract from application 2015/4096/P showing the proposed ground floor plan



Figure 41 Extract from application 2015/4096/P showing the proposed Kingsway and Keeley Street elevations (top) and the Wild Court elevation

Significance Plans

- 5.25 Presented below are a number of illustrative plans which indicate the residual significance of each room/rooms on each floor level of the building. The significance of each room is considered to be formed by a combination of its remaining evidential, aesthetic, historic and communal values, and its place within the overall plan-form or hierarchy of the building. The purpose of this exercise is to ensure that there is a baseline understanding of the architectural and historic value of the building, and also any other relevant aspects which constitute significance.

Key

 = Likely original fabric.

 = Later twentieth century or altered fabric.

 = Modern fabric of no interest.

- 5.26 Throughout the building there is surviving fabric particularly around the external elevations, original stair well and historic lift cores. The central toilet blocks all appear to be post 1971 additions as do all of the existing windows.

Basement



Figure 42 Basement significance plan. Note: numerous sub-divisions were installed at this level, many of which date to before 1971 and are likely to have been as a result of the building's use as an air raid shelter in 1942

Ground Floor

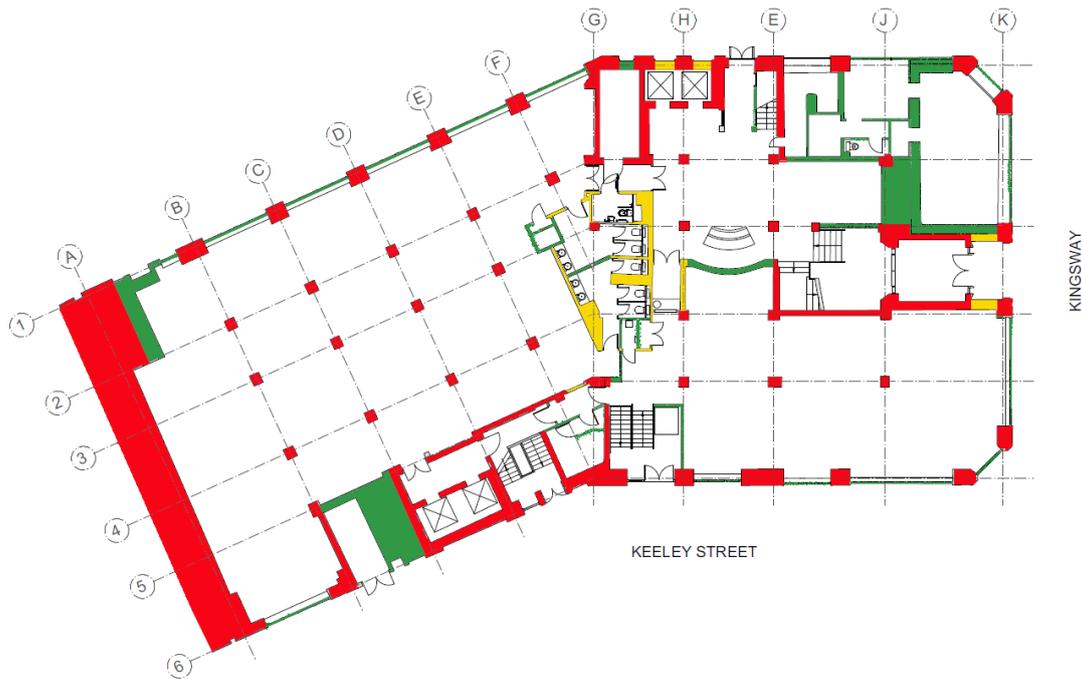


Figure 43 Ground floor significance plan. Note at this level, the entrances to the Kingsway facing shops has been moved multiple times, originally being within the marble vestibule. On Keeley Street the original loading bay door has been converted, internalising the space and an additional staircase and access point has been installed to the east of the original staff staircase. Note the enclosure surrounding the stair landings at this level have been altered, with the loss of the half the wall adjacent to the stairs.

First Floor



Figure 44 First floor significance plan. Note: The board room the fireplace survives though this has been repositioned and much of the Spanish mahogany panelling has been removed. The central toilet block has created a sense of enclosure, replacing the historic 'cashiers desk' which would have allowed a sense of

circulation and openness to the full extent of the floor plate beyond. Some elements of the original balustrade appear to have been re-used within the modern screening surrounding the boardroom.

Second, Third, Fourth and Fifth Floors



Figure 45 Second floor significance plan. Note: the second floor has been surveyed and is presented here as a typical example of the upper floor levels.

Sixth Floor



Figure 46 Sixth floor significance plan. At this level much of the alteration relates to the creation of an additional storey on top of the building including the insertion of a secondary central stair. However some of the original columns seem to have been retained.

Seventh Floor

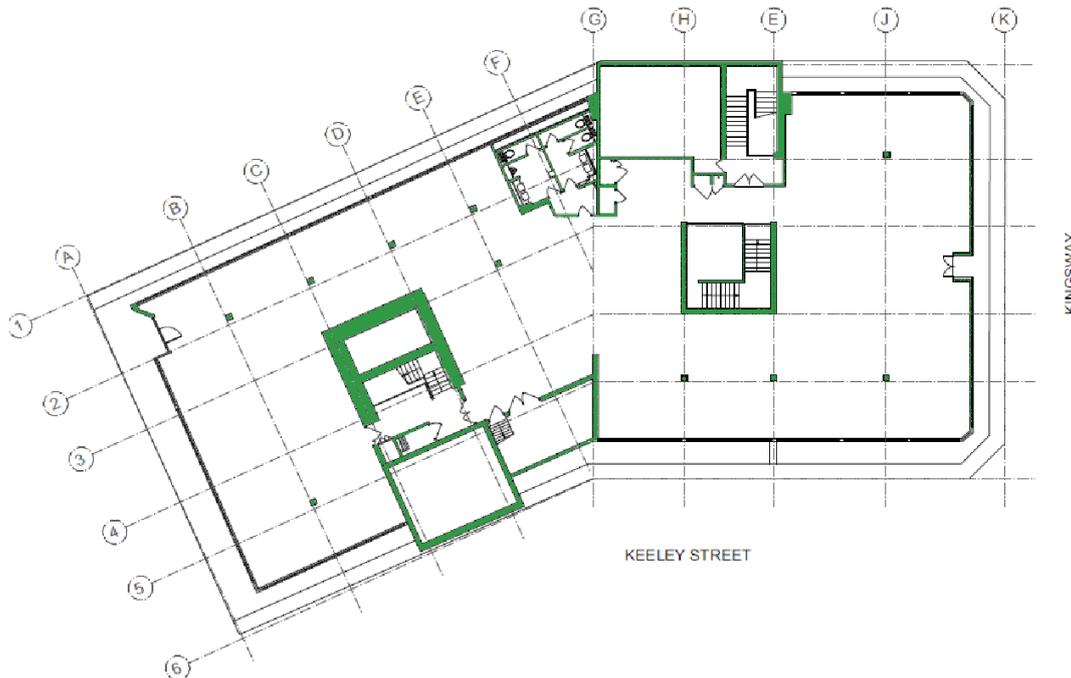


Figure 47 Seventh floor significance plan. The entire floor was added in the late 1980s and is of no heritage interest.

Summary of Significance

- 5.27 Overall, Kodak House is considered to hold a **moderate/good** level of significance in heritage terms.

Elevations

- 5.28 The special interest of the building primarily resides in the grand external elevation to Kingsway, which express a restrained classicism reflecting the grandeur and ambition of the building as one of the first office buildings built in the open plan style within Britain. Original decorative fixtures to the Kingsway entrance, are also expressive of the date of the building and showing a richness of materials and craftsman ship. As the principal elevation its interest and sensitivity is also high. The Keely Street and Wild Court elevations are demonstrably subservient, with the change from stone to brick expressing this hierarchy, these areas are therefore of a reduced sensitivity however they continue to reflect their historic appearance and contribute to the significance of the building. The loss of the original windows to this façade as well as alterations to the openings Keely Street elevation, slightly diminish the contribution of these elevations, altering the historic appearance of the building. The late twentieth century roof extension is of no interest and does not contribute to the significance of the building.

Plan Form

- 5.29 This historic development section has shown the internal plan form of the building has undergone many waves of redevelopment. This includes the principal spaces at ground and first floor, with the sequential repositioning of many of the original partitions surrounding the lobbies and entrance stairs. Comparison of historic photos show the removal of the historic glazed partitions at first floor as well as the replacement of the original marble finishes, loss of the substantial cashiers desk at first floor and recladding of many of the columns altering their width and profile. As such the internal spaces are largely reflective of late twentieth century alterations, with

remaining historic fabric, such as the boardroom fireplace, repositioned within the building. As such while there is remaining evidential interest in the repositioned historic fabric, these elements are less sensitive to change. Modern partitions and altered fabric include the central toilet block, and screening introduced adjacent to the first floor Kingsway Façade.

- 5.30 This limited interest is reflected in comments from the council, regarding previous applications for internal works. These comments confirmed that areas of interest are largely within the formal entrance way at ground and first floor:

The remainder of the proposals relate to the reconfiguration of modern partitions within the open plan office areas beyond the high significance ground and 1st floor lobbies/staircase. These areas are of no intrinsic architectural or historic merit and the proposals will preserve the special interest of the listed building. (decision notice LPA ref: 2015/2748/L)

Columns

- 5.31 While some of the original columns remain in their original location, expressing the steel structure of the building, it is noted that the majority have been re-clad, altering their width and profile. These elements retain historic and architectural interest, cumulatively illustrating the early use of an open plan office design. It is noted that the recladding of these elements has reduced their overall evidential interest with the alteration to their material form. The interest of these elements resides largely in their reflection of the original plan form of the building.

Kingsway Conservation Area

- 5.32 The Kingsway Conservation Area was first designated on the 16th June 1981. The Conservation Area is focused around the Kingsway.



Figure 48 Map of the Kingsway Conservation Area showing the listed buildings (dark red) and the positive buildings (hatched)

- 5.33 Within the Conservation Area the majority of the built form was constructed in the early 20th century and are predominantly large-scale commercial buildings constructed in a Neo-classical architectural style. A number of these buildings are statutorily designated.
- 5.34 Most of the buildings were constructed with integral shop frontages at ground floor level. The building's principal facades are usually built of Portland stone, embellished with ornate classical detailing. The side streets do have a more secondary appearance and the buildings here use other materials, such as red brick as well as Portland stone. Those buildings which do not have a frontage onto Kingsway however, do use grand detailing on the side street elevations, though on a smaller scale than seen on Kingsway. The Kensington Business School is an example of this.
- 5.35 The area does not feature any green open spaces though the width of the Kingsway and the consistent building line and materiality help to create a sense of space.
- 5.36 There has been very little development within the Conservation Area ensuring that the street retains its strong Edwardian composition.

Overall Significance

- 5.37 Overall, the Kingsway Conservation area is considered to have maintained much of its Edwardian commercial character and is therefore considered to hold a **good** level of significance in heritage terms.

Contribution of Kodak House to the Conservation Area

5.38 Kodak House is located towards the southern end of the Conservation Area and is described within the appraisal as:

'a Portland stone building 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"'.

5.39 Indeed, although the building is one of a number of Portland stone structures with a frontage onto Kingsway, the simplicity of the façade makes the building a distinctive feature of the area.

5.40 As with many of the surrounding structures whose principal frontage stands on Kingsway, the side elevations of the building are much less noteworthy. Though the Therefore Kodak House is considered to make a **good** contribution to the Kingsway Conservation Area

6.0 Opportunities and Constraints

- 6.1 The Kodak building has undergone numerous alterations over time. While the building has retained many of its original columns, these have been encased in substantial layers of cladding, removing the original sense of volume within the internal spaces. Celebrated for its simplicity when first built, it is thought that the majority of the columns would have originally occupied a slimmer square foot print, allowing the openness of the floor plans to be appreciated and highlighting the innovative structure. Although the building's simplified Neo-classical external facades and general floor plan are generally still legible, late twentieth century renovation works have removed an appreciable understanding of a turn of the century building at the upper levels. Works such as suspended ceilings and generic modern office fit out, created an anonymous appearance. The restoration of a slimmer profile to these columns, stripping them back to the original steels would be of benefit to appreciating the core significance of the building as an early steel framed office block, which is where the special interest of the buildings stems. The reception areas at ground and first floors contain a second column type which is more decorative, with marble cladding reflecting the circulation of the floor plan and public facing use of these spaces. Refurbishment work during the late twentieth century within the ground floor has resulted in the replacement of the much of the fabric within this area.
- 6.2 Alterations to the lobby and loss of the cashier's desk and original screens to the board room at first floor have removed a sense of this historic circulation within the building at these locations as well as changing the material character of these spaces. Alterations to the fabric in these locations is therefore considered to have a reduced impact, given their current limited contribution to the significance of the space.
- 6.3 The function and historic appearance of the Keeley Street elevation is presently partially obscured, with the original service entrance blocked in and later louvres installed at ground floor. This prevents an understanding of how the ground floor and basement levels functioned as a secondary entrance into the building, as well as introducing incongruous materials into the facade.
- 6.4 Similarly, the appearance of the late twentieth century roof extension to the seventh floor is entirely without interest, and lacks a responsive approach to the materiality of the host building. It is noted the existing later addition lift overrun to the roof intrudes on views of the building from the surrounding conservation area and the loss of the original windows to the external facades exacerbates the late twentieth century character. There are however some original features still in situ, as noted on the significance plans, including the location of the staircase adjacent to the Kingsway entrance, the decorative fixtures to the main entrance and remaining original columns.
- 6.5 We therefore consider the building to hold an overall **moderate/good** level of heritage significance. This significance primarily relates to the construction of the building using steel framing, the open plan quality of the interior and decorative details to the main entrance which are characteristically Edwardian in design, reflecting the fashion for restrained neo-classical design at this time. The late twentieth century roof extension, loss of original windows as well as alterations to the window openings alongside the unsympathetic recladding of the internal columns slightly diminishes this interest.
- 6.6 The building is also located within the Kingsway Conservation Area which is considered to hold a **good** level of heritage value. Kodak House is considered to make a **good** contribution to the Conservation Area.

7.0 Proposals

- 7.1 The proposals seek to undertake a sympathetic redevelopment of the site to better reveal its significance. This section should be read in conjunction with the submitted drawing pack and Barr Gazetas Design and Access Statement.

External Facades

Keeley Street

- 7.2 The proposals include the restoration of a sense of openness to the old service loading bay opening to Keeley Street, removing the majority of the current infill masonry and replacing with glazing. This will reassert the visual function of decorative stonework surrounding this location, with the stone banding and key stone framing the historic entrance into the building within this façade. This is considered to improve the appearance of this façade, creating a better reflection of the historic appearance of the building.
- 7.3 The second, third and fourth bays alongside the ground and first floors have been shown to have undergone considerable change over time, with plant louvres, new windows and stone banding installed, creating an ad-hoc, back-land appearance. The inappropriate thickness of the replacement stone banding following the loss of the original windows at first floor is considered to detract considerably from the balance and aesthetic quality of this façade, with all of the later alterations cumulatively obscuring an understanding of this façade as an important secondary entrance, intrinsic to the use of the building. Presently the current overall appearance of façade is therefore of a closed-off, inaccessible elevation, save from small service doors. This creates a sense of dislocation from the rest of the structure and prevents an understanding of the original function of this façade as part of the whole building's circulation.
- 7.4 It is proposed these later additions are removed, creating three new window openings at first floor with a new lintel below. At ground floor a new access opening will be created using the full width of the fourth bay. The proposals have been designed to sit within the existing hierarchy of the façade, stopping below the stone banding at first floor, whilst removing the later fabric. As such the design is an honest intervention, removing later additions whilst adding new openings which respect the overall rhythm and hierarchy of the facade. A new stair and cycle entrance is proposed to the third bay, glazed to the main façade. This area of glazing, as with all the entirety of the facade, include new window frames incorporating metal glazing bars creating a Crittal style, in keeping with the historic appearance of the building. Additionally, the tall lift overrun to Keeley Street will be removed at roof level, providing a significant enhancement to this elevation. The site assessment has shown this element presently has an overbearing appearance along the street front, disrupting glimpses of the roof line due to its location at the edge of the parapet. Its removal is therefore welcomed, restoring the overall sense of the building's massing.
- 7.5 Therefore while the proposals will see a change in the physical fabric of the building, it is noted that this altered façade is less sensitive to change following the loss of the original fenestration and alteration to the openings at lower levels. The introduction of stairs and alterations to window openings in this façade are considered to be in keeping with the subservient character of the elevation and when assessed together with the reintroduction of crittal style windows and removal of the lift-overrun, the alterations are seen as a positive change. Care has been taken to keep this façade subservient to the Kingsway elevation, and retain the historic quality of a secondary access. This is reflected by the retained materiality of this elevation, using red brick with stone banding. The proposed changes to the Keeley Street elevation are therefore considered to have an overall positive impact on the building's significance.

Kingsway and Wild Court

The site assessment has identified cracking within the Portland stone within the external façades. As the interest of this elevation resides in its grand decorative quality the urgent repair of these cracks is needed to ensure the building does not degrade further. The significance assessment has found that the decorative quality of the main entrance is of high significance, reflecting the care and decorative detail of the original scheme. This elevation will be restored in full, enhancing the contribution of this area of the building as well as the overall significance of the building. This repair work includes the sensitive cleaning of the bronze spandrels, repair to white ceramic brickwork and retention of the early twentieth mansard extension.

- 7.6 As with Keeley Street, it is proposed that the later modern windows and altered openings are replaced with new windows frames with either integrated or plant-on metal glazing bars. This will be of huge benefit in resorting the historic appearance of the building, and will more closely align with the original Crittal style windows. Additionally, it is proposed the cleaning of the façade using appropriate conservation methods will better reveal existing external detail, particularly to the main entrance. This is considered to dramatically improve the appearance of the building, and is an overall enhancement.

Roof

- 7.7 The present upper floors of the building comprise a series of mid to late twentieth century extensions including 6th floor bronze addition completed in 1925, as well as a new 7th floor added in 1986. Both these additions are in poor repair with the later 7th floor particularly compromising distant views towards the building with an indifferent design, relating poorly to the historic building below. The roof line also presently includes the large lift over-run which contributes a blank elevation, dominating views from street level. A site assessment has indicated the prevalence of both mansard extensions, plant work and terraces within the surroundings, including the CAA building immediately to the south, terminating at sixteen storeys with a flat roof and additional plant work.
- 7.8 In order to improve the existing appearance of the roof line it has been decided to repair and restore the 1920s bronze clad extension, and maintaining the existing break line. The proposals include the refurbishment of the sixth and replacement of the seventh floor, retaining and restoring the 1920s bronze parapet. It is proposed this refurbishment will comprise bronze cladding to the exterior to blend well with the existing 1920s addition. A terrace and plant screening will also be added to the roof, addressing the present cluttered appearance of the roof as seen in high views from surrounding buildings. The works to the roofscape when taken as a whole are considered to be an enhancement, improving the disjointed appearance of the roofscape. It is noted that additions at roof level are a common feature of the buildings along Kingsway. The proposals have been carefully designed to blend well with the host building and later 1920s bronze addition, improving the proportions of the fenestration to provide a confident addition which will sit comfortably with the restored Crittal style fenestration below. While the proposals include the rebuilding of the seventh floor, with the addition of plant screening and a terrace, the resultant overall massing and of the proposals is broadly equivalent. The addition of more comprehensive screen will change the profile at roof level, however this is considered to be a benefit, resolving present untidy views. While this constitutes a change in the appearance of the building's upper levels this will have no impact on the existing contribution of these spaces to the significance of the building, presently comprised of later fabric. The consolidation of plant work to the roof is considered to improve views to the roof line of the building, which is presently cluttered, creating a more resolved overall appearance. As noted the proposed works will also see the removal of the existing lift overrun which due to its position close to the edge of the building appears overly dominant on the appearance of the building from the side street.
- 7.9 The character and appearance of the conservation area, has presently been found to be characterised by tall buildings with layered roof extensions to the upper levels of the Edwardian buildings which line Kingsway. The proposals are therefore found to be consistent with this existing character, preserving the high quality main facades whilst addressing the unresolved appearance of the roof. The proposals to the roof are therefore considered to be an enhancement.

Floor Plans

- 7.10 Within the upper floors it is intended to strip back the cladding to the surrounding the columns to reveal the original steels, removing suspended ceilings and late twentieth century office fit out. These alterations will return the existing columns to a slimmer profile noted within the historic plans. In this way it is hoped the interiors will better reflect the early twentieth century character of the building as well as highlight the early use of an open floor plan. As this is one of the key interests of the building this is of considerable benefit in heritage terms.
- 7.11 The decorative character to the entrance lobby at ground floor will be retained, using a high quality finish flooring and maintaining the appearance of a grand entrance way. It is noted that this space was extensively refurbished in the late twentieth century, including the loss of the original marble inlays to the floor. The replacement of this later material is therefore considered to have a neutral impact, retaining the overall grand character of these spaces. The improvements to the lobby are therefore considered to better reveal the historic character and original circulation, having an overall positive impact on the significance of the building.
- 7.12 Comparison of the historic photos of the boardroom, seen together within the floor plans, also show the removal of the original screens and partitions surrounding the lobby at first floor. While historic fabric such as the board room fireplace and elements of the balustrade have been retained, these have been repositioned reducing the sensitivity of these elements. It is proposed that the modern glazed screens, pendant light fittings and modern flooring will be removed. The historic stair, railings and columns will be sensitively restored.
- 7.13 A survey of the building has been undertaken and identified asbestos within the first floor ceiling, it is proposed this is replaced with a like for like design which will have a neutral impact on the appearance on this space. It is also proposed that the coffered ceiling at ground floor is redesigned as part of the refurbishment of this area. As noted within the historic section the decorative detail of this area has undergone substantial changes following the late twentieth century refurbishment works. This includes the coffering detail to the ceiling, with the instillation of air conditioning ventilation panels. The proposed partial replacement of the coffering at ground floor is therefore not considered to impact any fabric of significance and the redesign will reflect a more appropriate appearance for this space.
- 7.14 It is noted that areas of the building away from the main entrance and lobby have undergone substantial change following waves of alteration. This has resulted in the reduced significance of these areas of the building. This limited interest is reflected in comments from the council, confirming that fabric which contributes to significance is predominately limited to the formal entrance way at ground and first floor:
- “The remainder of the proposals relate to the reconfiguration of modern partitions within the open plan office areas beyond the high significance ground and 1st floor lobbies/staircase. These areas are of no intrinsic architectural or historic merit and the proposals will preserve the special interest of the listed building.”* (decision notice LPA ref: 2015/2748/L)
- 7.15 At ground floor it is proposed that the access from Keely Street is altered, creating a new set of internal steps and lowering the floor slab to create a level access from Keely Street, as well as the removal of the existing central toilet block. The removal of the later toilet block, which adds considerable clutter within the historic layouts and does not correspond to the historic use or proportions of the space is considered to be of benefit, re-asserting the openness of the original floor plan. While the proposals include a new partition and changes to the floor level, this reflects the transition in alignment of the building as the building takes in the corner of Keely Street, as well as the existing character which incorporates steps and a series of entrances. The new partition does not necessitate the loss of historic fabric of interest. While these works constitute a change, this aspect of the proposals is located away from areas of significance and is considered to have an overall neutral impact.

- 7.16 The proposed works include alterations within the service cores to the south west and north eastern sides of the building. These areas have been upgraded throughout the site's history, and as such while they reflect the historic location of these services, these spaces make only a limited contribution to the building. The proposals include the consolidation of the core to the northern elevation, reasserting the open plan of the majority of the ground floor. A new primary core will be created adjacent to the Wild Court elevation. This elevation is the most enclosed and historically used for the location of servicing. These works will retain the existing historic stair, creating a new lift shaft a secondary stair as well as installing new plant and risers. The consolidation of the core to this area, is therefore considered appropriate and will not affect the more sensitive fabric located within the ground and first floor lobby areas, or the old board room.
- 7.17 While these works will see the removal of columns to the floor plan to allow the new core to be installed, as discussed below, these works will ensure the specific contribution of the columns, perceived and understood as the primary support structure for the building, will be maintained. These works are therefore considered to have a neutral impact.
- 7.18 Similarly while the recreation of an entrance from Keeley Street will necessitate the loss of a portion of the ground floor ceiling to create a double height entrance to Keeley Street is not considered impact those areas of the building as contributing to its significance. While these alterations are considered to change the internal appearance of the building, these proposals are considered to protect both the appearance of the steel framed open plan office building dating to the Edwardian period, and retain fabric found to contribute to this significance.
- 7.19 The overall impact on the significance of the building is therefore considered to be neutral.

Columns

- 7.20 The scheme seeks the removal of a small number of columns, including:
- From level one to the top floor, one column will be removed within the new open plan office floor plate, and two columns removed adjacent to the new core construction, resulting in the removal of three per floor in total.
 - From the proposed Keeley Street reception at ground floor it is proposed that three columns are removed, as well as two adjacent to the northern core, resulting in five in total.
 - From the basement level, two columns will be removed to allow the new core construction, and one column removed to allow the new facilities layout, resulting in three in total.
- 7.21 While this will result in the loss of some historic fabric, the special interest and contribution of the columns to the significance of the building is in their cumulative appearance, creating an open plan floor space supported by steel structures rather than in the intrinsic historic value of the fabric. The proposals seek the removal of a very small proportion of these supports, retaining over twenty columns per floor, and the overall impression of a historic steel structure will remain and be better revealed following the strip back of later cladding to the columns. Therefore while the loss of the columns, as part of the original fabric of the building, will result in a degree of harm, this level is considered to be negligible and remaining within the spectrum of less than substantial harm overall. The proposals fundamentally retain the contribution of columns to the special interest of the building and are in line with proposals the Council have previously consented, including the removal of columns in the basement of the building.

8.0 Conclusion

- 8.1 This Heritage Statement has been produced to accompany proposals for the redevelopment of 65 Kingsway. This report solely seeks to assess the impact of the scheme on the historic environment. In particular, the design has focused on ensuring that the both the southern and eastern elevations respond positively to the surrounding built environment, maintaining the existing character to the rear of the site along Keeley Street.
- 8.2 The principle of internal alterations has been accepted by the council in previous applications, as well as the pre-application stage, noting that due to waves of refurbishment the interest of the building resides in what remains of the open historic floor plan, remnants of the historic steels, decorative main facades and entrance lobbies at first and ground floor. In contrast, the majority of the building interior comprises late twentieth century generic office fit out and is of no heritage interest. Further to this, unsympathetic alterations to the building include the infill of the loading bay to Keeley Street, the loss of the original windows and the insertion of a central toilet block, preventing an understanding of the open plan character of the floors as first built.
- 8.3 A site visit by the application team together with extensive historic research has shown that there are several opportunities to better reveal the significance of the building and improve the contribution to the surrounding conservation area. The proposals have therefore sought to make these improvements, focusing on stripping away later cladding and unsympathetic alteration, restoring the historic internal character of the building. The replacement of the existing unsympathetic windows are welcomed in particular, together with the removal of extensive layers of cladding to the remaining historic steels. While the scheme will see the removal of some fabric within the service areas, the proposals have preserved those spaces shown to contribute positively to the significance of the building. The improvements to the Keeley Street façade are found to be an enhancement, retaining the character of a secondary subsidiary elevation, whilst removing unsympathetic late twentieth century alteration. The works to the roof seek to improve the present unresolved appearance of the building without creating additional bulk, resulting in an overall enhancement to the appearance of the listed building and character of the conservation area.
- 8.4 Therefore, the proposals are considered to respect the character and appearance of the Conservation Area and have taken opportunities to enhance it where possible. Whilst it is acknowledged that the proposals will necessitate the loss of some early 20th century fabric, it is considered that the opportunity to otherwise enhance the appearance of 65 Kingsway with a sensitively designed proposals outweighs this loss. This assessment has therefore found that the proposals have an overall neutral impact, upon the conservation area and listed building. The proposals are thus considered to be acceptable and in line with all relevant Local and National Policies and Conservation Area guidance. We therefore see no reason in heritage terms why the scheme should not be viewed favourably by Camden Council.

APPENDIX 1

STATUTORY LIST DESCRIPTIONS

Location

Statutory Address: KODAK HOUSE, 63, KINGSWAY

The building or site itself may lie within the boundary of more than one authority.

County: Greater London Authority

District: Camden (London Borough)

National Grid Reference: TQ 30582 81277

Details

CAMDEN

TQ3081SE KINGSWAY 798-1/106/995 (West side) 08/09/71 No.63 Kodak House

II

Office block, incorporating Nos 61 & 65. c1911. By Sir John Burnet and Partners (job architect Thomas Tait) for Kodak; later attic storey. Built by Allen Construction Co. Steel framed construction with Portland stone facing and bronze spandrel panels emphasising the method of structure. Bronze roof canopy with antefixae masks. EXTERIOR: 6 storeys, basement and C20 attic storey. 5 window bays to main frontage, splayed 1 window corner treatment and 7 window bays to return. Windows with post 1973 glazing; originally 6 light casements with leaded panes. Plate glass ground floor frontage. Central doorway with bolection moulded surround and flanked by bronze torches. Plain stone continuous sill at 1st floor level; square-headed recessed windows. Stone pilasters between bays rise from 2nd floor level; they have bases but not capitals and lead flush into the top frieze. Coved stone cornice with band of Greek fret ornament. INTERIOR: has good original staircases, the principal staircase to 1st floor level of marble with bronze handrail. Other features may remain behind partitioning. HISTORICAL NOTE: an early example in London of an office block treated in a straightforward manner. Although a pioneering work of modern design it evolves from an Edwardian Neo-Classical design, stripped of almost all ornament and with a Beaux Arts axial plan. Burnet made a study tour of America in preparation for this project. The detail appears to be by Thomas Tait: despite Burnet's doubts about the lack of usual decoration, the client liked the simplicity.



BIDWELLS