



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

Addendum to the Space House, 1 Kemble Street & 43-59 Kingsway WC2B 6TE
Historic Building Report and Heritage Views Impact Assessment 2019

For Seaforth Land

March 2021



Camden
**WILD
STREET**

KEMBLE STREET

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1.0 Introduction and Background

This report is to support an application for minor material amendments via Section 73 to planning permission ref. 2019/2773/P, and to amend the Listed Building Consent ref. 2019/2790/L via a Section 19 application.

It relates to new and modified proposals, which build on the changes already granted consent and propose further alterations both externally and internally that have come about as part of the detailed design process. The proposals, which are subject of this report, form part of the continuation of the wider consented proposals to extend and refurbish the commercial blocks and to improve the public realm.

This report should be read in conjunction with Donald Insall Associates' report: *Space House, 1 Kemble Street & 43-59 Kingsway WC2B 6TE Historic Building Report and Heritage Views Impact Assessment* (May 2019) which accompanied the earlier application.

1.1 Previously Consented Works

The works granted permission/consent in November 2019 comprised the following:

Removal of existing roof plant equipment at 1 Kemble Street and erection of a single storey facsimile floor plus one setback floor; removal of roof plant from 43-59 Kingsway and erection of a single storey set-back extension; removal and replacement of the glazing to the existing enclosure of the southern external stair on Kingsway and new glazing at ground floor level across the site; enclosing the redundant petrol filling station area with slimline glazing; facade cleaning; new landscaping and public realm works and internal alterations to both buildings in connection with their refurbishment and change of use from Class B1 offices to Class A1/A3 and flexible Class B1 office / Office and events space (sui generis) at part ground and basement levels. Planning Permission Ref: 2019/2773/P and Listed Building Consent Ref: 2019/2790/L.

1.2 Summary of Significance

Space House, listed Grade II, was built in 1964-8 to the designs of the architect George Marsh of Richard Seifert and Partners, London's most prolific mid-century commercial practice, as a speculative office and showroom development for London property mogul Henry Hyams. The building has historic interest for its association with Marsh, Seifert and Hyams, one of the most successful developer-architect partnerships operating in 'swinging' London during the 1960s property boom. They were also concurrently working in collaboration on another striking office development, Centre Point, (now also listed at Grade II), one of London's earliest skyscrapers.

Space House comprises two connected buildings: an eight-storey slab block facing Kingsway and a 15-storey (plus basements) cylindrical tower to the rear of the site, connected by a two-storey bridge link. A full assessment of the relative significance of the built fabric can be found in the Historic Building Report of May 2019 by Donald Insall Associates, and is summarized below:

The primary significance of the buildings lie in their innovative use of a partial pre-cast concrete frame and how this is expressed in their differing slab and cylindrical forms, their spatial relationship and external elevations. The way in which the structure is handled, with interlocking cruciform shapes and Y-shaped pilotis on the tower in polished concrete, and tapered pilotis and slab formation in polished granite on the Kingsway block, creates a striking sculptural effect. The side elevations of the Kingsway block, which include interlocking structures inspired by a Greek-key motif, also make an artistic contribution to the surrounding public realm. Internally, the buildings were originally designed as open-plan offices and showrooms, but have since been subdivided with new partitions and furnished with new fixtures and fittings to create modern office interiors that are of no significance.

1.3 Summary of Previous Heritage Analysis and Policy Justification

The Space House Historic Building Report and Heritage Views Impact Assessment, which supported the application, made it clear that the proposals were considered to preserve the special architectural and historic interest of the listed building, which resides overwhelmingly in the principal external elevations of both the tower and Kingsway blocks. They were also considered to preserve the character and appearance of the Kingsway Conservation Area, of which the Kingsway block forms a part, and improve views from additional adjacent conservation areas.

In the case of both the Tower and Kingsway slab block extensions, the potential impact of all assessed views was considered to be mitigated by careful and sensitive design, which ensured that the extensions were subservient to the listed building and allowed the original and celebrated forms of its exterior to remain dominant. Therefore, whilst the proposed elevations would be visible in local views, they were generally not considered to cause harm in heritage policy terms, and in cases where harm was potentially perceived, this was considered 'less than substantial' in light of policy put forward by the NPPF regarding impact on setting.

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

2.0 Commentary on the Current Proposals

2.1 Description of the Proposals and their Impact on the Heritage Assets

The proposals, as set out in detail in Squire and Partner's Design and Access Statement, are briefly summarised below. The impact of the proposals on the significance of the listed building, and on the Kingsway Conservation Area where relevant, is then set out in italics below.

The majority of these proposals have been presented to the London Borough of Camden planning and conservation officers during pre-application meetings in June 2020 and September 2020. This is noted, and feedback is included, in further detail in the DAS.

External

2.1.1 Car Parking Proposals and Landscaping

It is proposed to replace 4 basement parking spaces (including 2 electric vehicle spaces) into the public realm design in the same location as the consented loading bay and the allocated spaces for occasional and emergency access required by UKPN. The final ground floor design is subject to condition 18 of the planning permission. Further details are also included in Gustafson Porter + Bownman's Landscape Chapter Addendum.

The proposal to have 4 parking spaces spread out with one space in front of the Kingsway building would have a neutral impact on the setting of the listed buildings and the Kingsway Conservation Area. The car parking spaces would be located to the rear of the site, away from the main thoroughfare of Kingsway and outside of the conservation area. Furthermore, the relocation of the 4 car park spaces from the basement provides a number of public benefits, as detailed in Squire and Partner's document. This includes increasing the long stay cycle store and shower provision at basement level, thus encouraging and enabling a greater number of building users to use sustainable transport means to travel to the site, diversification in the type of cycle stand available, separating vehicles and cycles in the scheme through sensitive design to improve safety of circulation, and maintaining the approved level of electric charging points.

A fuel cabinet is required within the public realm; to ensure this is not visible it is proposed to utilise the existing kidney bean structure to the west of the Tower and of which is curtilage listed Grade II. The structure contains a shaft below providing the necessary service link to the basement plant rooms. The existing louvres will be replaced with a concealed louvered door for access to the fuel cabinet .

This is an original structure, one of two original intake and extractor units, in the setting of the listed building. The structure and the existing louvres to the structure are in a dilapidated condition and their replacement would be a minor benefit. The appearance of the listed structure would be maintained and the existing mosaic would be cleaned and any damage to it would be made good, which would also be a minor benefit.

The DAS refers to proposed ventilation grilles in ground floor, security cameras, external power and water supplies and external lighting. However, the final details of these proposals would be submitted via planning condition listed building consent condition 3 (various parts).

2.1.2 Tower UKPN substation façade treatment

This MMA is proposing to vary the wording of condition 3L to remove the requirement to assess the feasibility of a green wall in this location. The submission demonstrates that green walls are not appropriate in this location and proposes a revised design for the UKPN facades for which approval is sought. Final details of the design for the facades will be subject to condition 3L.

The amended proposal is for the existing UKPN louvres to be retained and repainted, with the existing brickwork below the louvres cleaned and made good and the existing doors into the transformer rooms repainted. Additional louvres would be added at high level above each of the four transformer room bays to the Tower, with additional louvered doors added into the full height bank of louvres to the east of the Tower for the emergency escape route for the office levels.

The proposals would have a neutral impact on the significance of the listed building and on the setting of the Kingsway Conservation Area. The alterations are largely redecoration with the addition of some additional louvres, which are in keeping with the design of the louvres that already exist in this location. Most sensitive in this area are the Y-shaped pilotis at the base of the tower, which form part of the listed buildings' primary significance, contributing to the sculptural forms of the cylindrical tower and slab form of the Kingsway block and its tapered pilotis. The proposals would ensure that the appearance of these pilotis are preserved and the new louvres would remain recessed within the space created by pilotis, not affecting their sculptural form.

2.1.3 Tower Reception

Minor amendments are proposed to the doors in the glazing to the Tower Reception and Filling Station Retail unit. The approved glazed doors to the glazed façade would be maintained; however a thin metal frame is required to all the doors in the façade to accommodate security equipment. The size of the metal frame and detailed drawings and specifications have not been finalised and will be submitted via Condition 3LBC b).

The accessible doors, in the approved scheme located to one side of the main entrance, would be relocated either side of the revolving door. The glazed door to the firefighters entrance would be increased from a single leaf door to a leaf and half. The large single leaf doors into the filling station have changed to a set of glazed double doors.

These minor changes to the ground floor elevation through the relocation of doors and their slight increase in size, in relation to the consented scheme, would have no harmful impact on the listed building. The new accessible doors either side the revolving main door would be beneficial to the Tower reception façade, consolidating all entrance doors into one central location.

A UKPN escape route is proposed between the 33kV substation and the filling station, which would involve the introduction of a brick wall to the northern end of the canopy, which would slightly reduce the size of the filling station retail unit. An external louvered gate would be added at the perimeter of the UKPN external wall.

The external louvered gate would maintain the profile of the Tower at ground floor; furthermore a number of louvered areas are found to the base of the tower and this additional gate would be recessed behind the pilotis. This would have a neutral impact on the significance of the listed building.

2.1.4 Alterations to the Kingsway Ground Floor

The consented design provides three glazed doors on the east elevation into the reception along Kingsway. The proposed design would see these doors removed to allow for Facilities Management loading bay areas at ground floor. The façade treatment to the elevation in this location is proposed as clear glazing to match the adjacent reception and retail units. As there will be a manager's office behind this location, a wall is proposed to be set back from the glazing and finished in timber panelling to match that of the reception area, creating a shopfront feel when viewed from the street. The ambition is to activate this area with an illuminated display that would advertise events and such like. The detail will be subject to Advertising Consent and Listed Building Consent Condition 3d.

The removal of the doors from the east elevation would be a benefit in relation to the consent, as the proposal of clear glazing would be more in keeping with the consented appearance of the improved ground floor elevation. The clear glazing in this area, paired with a set back wall internally, would creating a shopfront feel when viewed from the street that also appears as a continuation of the reception area. This would help activate this elevation, of which faces onto Kingsway, and of which was always intended to have a commercial and retail character.

2.1.5 External door removed from Kingsway north facade

The consented design retained the existing external metal panel and doors to the north façade, a means of escape from the basement, which provided access to the mezzanine level above the substation. The proposed design maintains the external basement door and escape stair in their consented location, however the external door to the mezzanine stair has been removed and replaced with a masonry wall and dry riser breaching inlet. The wall would be finished by mosaic tiles.

The proposed masonry wall would be an improvement on the utilitarian and modern metal doors and the use of mosaic tiles would match the adjacent mosaic found to the side wall of the Kingsway substation. The change would be a modest benefit and would preserve the character of this area of the Kingsway Conservation Area.

2.1.6 Kingsway Southern Stair Enclosure and Curtain Walling to Retail Unit

The approved scheme replaces the existing glazing to the southern stair curtain-wall enclosure with new high quality glazing. The amended proposal is to replace the curtain wall frame like-for-like. This would reduce the risk of damage to the frame during the removal and replacement of the glazing and doors. Internally it is proposed to add a new glazed screen between the retail unit and the southern stair so that visitors to the retail unit cannot access the stair, which leads up to the office floors and down to the basement. The amended proposal also relocates the double doors from the western façade of the southern stair enclosure to the east facade. A new set of double doors would also be included to the retail unit as demonstrated in the proposed plans.

The consented design significantly improves this area around what was originally an external stair at the south end of the Kingsway block but is currently enclosed with low quality glazed partitions separated by heavy aluminum mullions of the late-20th century. The replacement of the frame like-for-like would improve the appearance of the curtain walling, providing a cleaner profile as viewed from the street. Furthermore, the frame is of no historic or architectural interest. The minor alterations to the consented glazing and relocation of doors would be neutral in their impact and overall the proposals would remain a benefit of the consented scheme.

2.1.7 Amendments to Typical Windows

The consented scheme refers to openable fan lights but does not identify the location of these fan lights or how many there would be across the Tower and Kingsway elevations. Pre-application advice stated the Council's preference for the opening windows to maintain the grid pattern and in a uniform way, with the existing percentage of windows that open to be maintained as far as possible. The proposal is to have every third window to both buildings openable. The consent notes that the Kingsway building should avoid openable windows on the east façade due to poor air quality. However, the proposal would provide these but have them locked by the building management so that they can be opened in the future when air quality on Kingsway improves. As set out in more detail in the DAS, openable fan lights have been found to be not suitable and so the proposal is to have a central openable pane to all the openable windows across both facades. This application seeks approval for the principal of the design and distribution of windows and detailed designs will be submitted to Camden for approval under Listed Building Consent (ref 2019/2790/L) Condition 3LBC c).

As demonstrated in the DAS the proposed frames and glazing would remain in keeping with and would be sensitive to the original character and appearance of the listed building, whilst providing the required thermal and technical performance criteria. The frames to the Kingsway building would be of the same thickness and profile as consented, which replicate the existing frames as closely as possible, whilst the central mullion to the openable Tower windows would be slightly thicker. Internally to the openable windows to the Kingsway building and the Tower, the inner frame would be visible, however it would be proportional to the size of the window and would not disrupt the aesthetic of the window composition. Furthermore, these changes would not be clearly perceptible to the eye and the appearance of the building would be maintained from street level, the overall impact being neutral.

2.1.8 Kingsway West Elevation

It is proposed to add an additional vertical bay of windows with translucent glazing to the west elevation. This differs from the consented scheme, which has four vertical bays of windows with translucent glazing, which matches the existing condition. The additional bay would conceal the wall to the services riser that runs up the building in this location and help to prevent heat from building up in the cavity between the glass and the riser wall, reducing the risk of thermal shock in the glass. This application once again seeks approval for the principal of the design and detailed designs will be submitted for approval to Camden via Listed Building Consent (ref 2019/2790/L) Condition 3LBC c).

The additional bay of translucent glazing would echo the existing and would have a neutral impact on the significance of the listed building, acting to prevent a harmful impact that would be brought about by the riser wall potentially being visible through the clear glazing. The west elevation is just on the edge of the boundary of the Kingsway Conservation Area and so is not visible from the wider conservation area and would equally have a neutral impact.

2.1.9 Kingsway North and South Elevations

The consented scheme saw the grey tinted opaque glazing to this elevation replaced with clear glazing. The revised proposals would still replace the grey tinted glazing but with matching grey tinted glazing. This application seeks approval for the principal of the design and detailed designs will be submitted for approval to Camden via Listed Building Consent (ref 2019/2790/L) Condition 3LBC c).

This would be a benefit on the consent as it preserves the original appearance of the building in these locations. The overall impact on the listed building would be neutral.

2.1.10 Tower Extension

The consented design locates the BMU within the external plant room, which is concealed by the parapet of the extension roof when it is not in use. However, the size of the required BMU would sit 253mm above the consented planning datum.

As the BMU is located in the centre of the Tower roof plant enclosure it will not be visible from street level when it is not in use. The DAS provides revised AVR views that demonstrate that it would not be visible and therefore would have no impact on the listed building.

An AOV is now required on top of the stair for smoke clearance in the event of a fire. This would sit approx. 250mm above the consented planning datum. The consent allowed for 2 flues which were also visible above the consented planning datum; the proposal reduces this to one flue. A fall restraint system would also be added to the top of the extension for maintenance.

The DAS provides revised AVR views that demonstrate that none of these additions would be visible from street level and therefore the minor changes would have no impact on the listed building. The reduction of flues would be a minor benefit.

The consented design allowed for a 100mm roof build-up; however, it has since been established that this would not meet the thermal and acoustic requirements. To do so, the insulation would need to be increased from 100mm to 210mm. In addition to this, the required roof finishes would result in some sections sitting higher than the outer parapet.

The proposed roof finishes, although higher than the outer parapet in some areas, would still sit below the top parapet level (inner parapet) and would have no impact on the overall appearance of the consented roof form.

The consented scheme has an external terrace at level 17 of the Tower; however the doors to the terrace were not shown on the approved plan. The proposed design adds four double doors to the extension curtain walling to allow access the external terrace.

This alteration would be to new consented fabric and would have no impact on historic fabric or significance.

Further minor alterations are proposed to provide additional risers within the external plant room, double doors added to provide direct access to the Tower Plant from the core and a plant room door within the office floor plate to allow access to all areas of the enclosure.

This alteration would be to new consented fabric and would have no impact on historic fabric or significance.

2.1.11 Tower Precast Facade Cladding

Minor amendments are required to the existing precast cladding of the Tower in order to accommodate the BMU cradle safety requirements. This includes BMU facade restraint sockets and a BMU emergency landing scenario. The restraint sockets would be inserted into the precast cladding horizontally at intervals of 3m at levels 12 and 16 (part of the extended roof level) of the Tower building. The BMU restraint sockets are required in order for the BMU to operate safely and to prevent the cradle from swinging against and damaging the façade in high winds. In terms of an emergency landing scenario for the BMU additional safety measures are proposed for the top of the filling station canopy in case the BMU cradle needs to land on this structure. Restraint sockets are required on the level 01 ring beam vertical face in order to secure the cradle in place so that the operators can be rescued. The sockets would be 20mm diameter and will have inserts that will be colour matched to the precast if possible. These restraint sockets would be concealed from view at street level by the canopy. A fall restraint safety line is also required.

The sockets to the tower would be flush to the precast cladding and would not be discernable from street level. The sockets would have a very minor impact on historic fabric a level 12, but could be removed and the penetrations made good in future; overall the impact on the listed building would be negligible. The restraint sockets would also have a very minor impact on historic fabric, but could be removed and the penetrations made good in future. The stainless steel fall restraint line posts would be set back from the canopy edge and would only be 200m high and not visible from street level. Overall the impact on the listed building would be neutral.

Bat boxes are proposed between the restraint sockets on the existing ring beam set behind the filling station canopy. The final details and number of bat boxes are suggested to be confirmed under a new part of Condition 3 of the Listed Building Consent.

The bat boxes would not be visible from street level and would have added ecological benefits. Subject to the detail of fixing these boxes to the listed building, they would overall have a neutral impact on the listed building.

2.1.12 Bridge Link

The consent allows for three sets of double doors on either side of the Tower and Kingsway building at level 3 which lead out onto the roof. It is proposed to reduce the quantity of doors to the terrace to one set to both buildings. In place of the consented doors it is proposed to include windows typical to the Kingsway block and Tower.

This proposal would be a benefit to the consent, providing a design which is more in keeping with the existing appearance of the listed building in these locations.

Internally there is consent for a new partition with double doors subdividing the Tower office space from the Bridge Link at levels 1 & 2. The proposals would remove this proposed partition to allow for flexibility for a future tenant.

This partition is part of the consent and is not part of the original design and its omission from the proposals would have no impact on the listed building.

A Listed Building and Planning Application submitted in January 2021 (Ref: 2021/0351/P and 2021/0318/L) included the proposed demolition of the Bridge Link roof. Investigations into the structural stability of the link bridge roof has established that it is only able to take a light load, for example for maintenance purposes only. This does not therefore support the consented use as a terrace. The proposal is thus to demolish the existing weak slab and replace with a new slab. Steel strengthening is required in localised areas to the columns on the Tower and Kingsway side of the bridge link.

The link bridge roof appears to be original material and the loss of the slab would result in the loss of a small amount of historic fabric. However, this fabric does not form part of the special interest of the listed building. In terms of design, the new slab would not increase the height of the link bridge. The localised strengthening may also result in the loss of a small amount of historic fabric but the alterations would not be visible externally and would have no impact on the appearance and character of the listed building. They would however be visible internally, within the Bridge Link floorplate. As shown in the drawings they have been laid out to align with the existing structure and would have a minimal impact on the interior in this location.

The consented design for the Bridge Link roof allowed for a 100mm roof build-up; however this is not sufficient to meet thermal and acoustic requirements and the insulation would be increased to 210mm based on the products. In addition the roof finishes would be laid to falls, resulting in the roof build-up section higher than the perimeter parapet.

The views located in the DAS confirm that the increase in roof finishes build-up would not be visible from the ground and would have no impact on the character and appearance of the listed building from street level.

This application seeks permission for the principal of planters on the Bridge Link roof and requests a new part of listed building condition 3 to require detailed to be submitted for any future works. This would be for future tenants who wish to use the area as a roof terrace.

The DAS demonstrates that planters set back from the roof edge by 2500mm with a maximum height of 450mm would not be visible from the street and thus would have no impact of the external appearance of character of the listed building.

2.1.13 Kingsway Extension

The consented design for the extension to the Kingsway building had a clear top parapet line with no elements protruding above it. Following detailed design the top of the lift overrun now exceeds the consented height of the Kingsway extension by approx. 440mm, in order to meet the thermal and acoustic performance requirements. An AOV is also required on top of the stair for smoke clearance in the event of a fire. This will sit approx. 430mm above the consented planning datum.

The visual impact of the increased lift overrun height and the AOV has been tested and it is not visible in any of the AVR views, as demonstrated in the DAS.

The consent allows for a 395mm finished floor zone above the existing Level 08 slab. However, further investigations have established that the existing level 08 slab does not have the structural topping required for fire performance or the structural stability required for the new extension. The required structural topping would raise the finished floor level by 85mm.

The setback perimeter coping would conceal the edge of the final floor finish and this small increase in height would not be visible from street level, having a neutral impact on the extension and the listed building as a whole.

The roof of the Kingsway extension would be planted to provide a biodiverse green roof, planted with a mixture of wildflowers and grasses to create a habitat attractive to wildlife. Invertebrate boxes are proposed to be located on the roof adjacent to the green roof whilst swift boxes would be recessed at high level into the facade of the north Kingsway extension elevation. These proposals would help the scheme achieve the credits to pursue a BREEAM 'Outstanding' rating of which is aspirational (although not a requirement).

The roof extension has been identified as the most appropriate location as it is new construction whilst allowing for a large continuous area of planting that would be set back from the perimeter of the parapet. This would ensure that the green roof would not be visible from street level and would prevent plants from growing over the edge of the parapet and potentially affecting the sculptural form of the listed building. The green roof would have a neutral impact on the significance of the listed building, whilst having ecological benefits.

Internal

2.1.14 Alterations at Basement Level 1 and 2

Changes at basement level 1 and 2 would see the alteration of the consented layout in order to provide an increase in long stay cycle parking and further shower and changing facilities, as well as alterations to the back of house facilities and circulation corridors. The consented scheme also had a large plant room; this would be replaced by a number of smaller plant areas to improve operational function, as well as associated reconfiguration of plan form. A circulation corridor would be introduced to allow access between the Tower and Kingsway at this level. An additional goods lift would be located adjacent to the goods lift in the consented design, connecting Kingsway from the ground floor to basement level 2. Additional ductwork and risers, that span between the basement 2 and ground floor levels, are required. The approved scheme included a long void along the eastern boundary wall, which has been excluded in this amendment. Furthermore, the large double height space to the flexible B1 events space has been reduced.

The proposed alterations to the basement 1 and 2 layout of the Tower and the Kingsway block would cause no harm to the special interest of the listed building. Basements 1 and 2 were designed as utilitarian and open plan spaces, which have since been altered, the plan form of which is not of any particular significance or interest. The proposals would also result in a reduction in the amount of slab to the eastern boundary wall proposed for demolition as well as in the consented double height space; the retention of this original fabric would be a benefit over the consented scheme. In terms of the required increase in the size of the shaft for the additional goods lift and the additional holes through the floor plate between basement 2 and ground floor this would result in the loss of some historic fabric. Loss of historic fabric would also result through the addition of additional risers. However, this is balanced by the amended scheme resulting in less fabric being demolished overall from the approved scheme. This is addressed further at 2.1.22.

2.1.15 Tower Reception

Internal alterations to the consented plan form are proposed to the reception area of the Tower. The consented scheme had a curved wall separating the reception area from the central lift lobby. The proposal layout would see the reception area increased in size and would remove the curved separating wall. Speed gates would instead be used to separate the reception and the Tower lift lobby.

The removal of the consented curved wall would allow for a visual link from the reception to the lift lobby, allowing for the curve of the tower and it's interior to be more readily understood. This proposal and the enlarged reception area would be beneficial in comparison to the consented scheme.

A protected lobby is now required for fire safety, between the consented Tower Reception and the Filling Station retail unit. This would result in the reduction of the size of the consented Filling Station retail unit. In order not to affect the appearance of the Tower reception a fire curtain is proposed to form the protected lobby. A mullion is required behind the glazing to the external elevation to accommodate the rail for the fire curtain that forms the protected lobby. The final detail of the mullion will be subject to approval under listed building consent condition 3c).

The impact of the lobby on the facade would be limited by following the line of the external silicon joint between the external glazing; internally the mullion would be made as small as possible. Overall this has been established as the least intrusive method of protecting the lobby and would have a neutral impact on the significance of the listed building.

2.1.16 Typical Floors to the Tower

Alterations are proposed to the WC layout on all levels, of which are located in the central core. Alterations are also proposed to the riser locations in the core.

These alterations related to a consented layout within the consented core and would have a neutral impact on the significance of the listed building.

Floor strengthening is required to the existing slab to level 1; here it is proposed to add reinforced concrete walls to transfer the loads from above in order to support the existing columns below. The walls would be full height but would only protrude out part of the way into the floor plan. More detail is provided in the Structural Statement 1st Floor Strengthening by Pell Frischmann, which accompanies this application.

These walls will be visible and form part of the floor plan, adjoining the outer wall of the consented core on its north side. The floor plan itself was always designed to be open plan and flexible and is not of significance; furthermore the use of concrete fits with the character and aesthetic of the listed building and the walls would most likely be utilised to form meeting spaces, or suchlike in the future. Although visible, the walls, as set out in the structural statement, would provide the required structural integrity to support the consented extension whilst requiring relatively minimal intervention, being required only at first floor level of the tower. Overall, the addition of the walls internally in this location would have no harmful impact on the overall significance of the listed building.

2.1.17 Internal Changes to the Tower Extension

The consented scheme has two internal staircases that link the office floor plates at levels 16 and 17. The amendments would see one stair omitted and the other stair would be pulled away from the core wall to allow for a continuous ring of services around the core. The layout of the WCs at level 16 would also be amended, as would the layout of the lift lobby walls and doors.

This alteration would be to new consented fabric and would have no impact on historic fabric or significance.

2.1.18 Kingsway Ground floor layout

Amendments are proposed to the consented design for the Kingsway ground floor, reducing the reception area in size by including a second goods lift (as mentioned in relation to the basement at 2.1.14) and a WC, and a protected lobby that separates the reception and goods-in areas.

The additional lift would result in the loss of a small amount of original slab; however, this modest amount of fabric loss would cause no harm to the overall significance of the listed building. Furthermore, the changes to plan form relate to consented plan form rather than original plan form and would be neutral in their impact.

The existing staircase from the outside to the Kingsway substation mezzanine is to be demolished and replaced with a new staircase providing access from the mezzanine to the Kingsway reception.

The staircase is a utilitarian metal staircase of no historic or architectural interest and its demolition would have no impact on the listed building. Furthermore, the changes to plan form relate to consented plan form rather than original plan form and would be neutral in their impact.

2.1.19 Kingsway Typical Layout

Minor changes are proposed to the layout of the consented north and south cores, as set out in the DAS.

These minor changes relate to consented layouts and would have a neutral impact on the listed building.

2.1.20 Kingsway Extension

Minor alterations are proposed to the sliding doors in the curtain walling of level 8 and to the general level 8 layout. These are detailed in the DAS.

These alterations would be to new consented fabric and would have no impact on historic fabric or significance.

2.1.21 Removal of Screed

It is proposed to remove all of the screed that has been laid over the floors in both buildings, except where demolition has already been granted consent. Screed would also be removed locally from the A-beams to the typical floors of the Tower.

It appears as though much of the screed is a later addition to the building; however, some areas may be original. However, the screed is at most of modest significance and therefore broadly adaptable in relation to the hierarchy of significance of the building's fabric. Therefore, its removal would cause no impact to the significance of the listed building. Furthermore, areas of the screed have already been consented for removal as part of the demolition of slab.

2.1.22 Demolition

Section 8 of the DAS details the areas that have consent for demolition, which as part of the proposed scheme, would be retained. The DAS includes plans and elevation diagrams that demonstrate the areas of approved demolished fabric that is now proposed to be retained.

The amended proposals would see a considerable increase of fabric retained as demonstrated by the drawings, an overall reduction of 460 m² of demolition (subject to final detailed design). This would be a benefit of the consent which would result in the retention of an increase in the amount of original fabric.

In order to implement the detailed design for services further penetrations would be required into the walls and slabs of the building fabric. The DAS requests a new part to condition number 3 of the listed building consent as the size and location of every penetration has not yet been confirmed.

These penetrations would result in the loss of small areas of original fabric, which may result in some minor harm; however, this loss of fabric would not impact the special interest of the historic building. Furthermore, the amended proposals see a substantial reduction in the amount of demolition and these areas of further demolition would be minor in comparison.

3.0 Summary Justification and Conclusion

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

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

The relevant Camden policies are:

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

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

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

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

The London Plan (2021) has a policy that seeks to protect built heritage. Policy HC 1 (C) sets out that in development proposals heritage significance should be conserved, harm avoided and enhancement opportunities realised.

Addressing these policies, the proposals would conserve the significance of the listed building, areas of change focused in areas of lesser significance or where changes have already been consented. The proposals would see some minor harm where in terms of the loss of original fabric however once again this would not harm the overall significance of the listed building. Furthermore these alterations are required to continue the efforts of the consented scheme, and to implement the detail design scheme, in order to upgrade the office buildings to provide the highest quality of commercial accommodation, and would continue to support the optimum viable use of the listed building. It would also see the retention of fabric previously consented for demolition, resulting in less demolition overall with the proposals of a less invasive nature.

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

The amended proposals are in areas that are less sensitive or that have already have consent for alteration and are not of significant architectural or historic interest. The works would be neutral in their impact on and would therefore preserve the features of special architectural and historic interest, in this case the sculptural forms of the two blocks and their principal elevations and the buildings' optimum viable use, which is what the law requires.

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

However, this harm is balanced by the fact that the areas of demolition that result in minor harm are in areas of lesser significance, and those that do not contribute to the building's special interest. Furthermore, this application provides an overall reduction in the amount of demolition required, a reduction of 460 m² (subject to final detailed design) when compared to the consented scheme, meaning that more original fabric will be preserved. The replacement of the fenestration would see more environmentally sustainable windows installed but to the original designs, this would preserve the significant architectural design but has benefits in terms of sustainability. The proposed amended scheme also has a number of further benefits, in comparison to the consent scheme. This includes:

- An improved east elevation to Kingsway which sees the glazing to the reception and the reception design treatment continued, creating a more active frontage;
- Alterations to the northern Kingsway façade where the utilitarian and modern metal doors are replaced by a wall finished in mosaic tiles, which would match the adjacent mosaic found to the side wall of the Kingsway substation, preserving the character of this area of the Kingsway Conservation Area;
- The like for like replacement of the southern stair enclosure frame, improving the appearance of the curtain walling and providing a cleaner profile as viewed from the Kingsway Conservation Area;
- The reduction of flues above the consented planning datum of the Tower from two to one;
- The removal of the consented curved wall in the Tower reception, allowing for the curve of the Tower and its interior to be more readily understood;
- The reuse and repair of the 'kidney-bean' structure, a curtilage listed structure, replacing the existing dilapidated louvres and cleaning and repairing the existing mosaic

Overall the proposals would help contribute to the implementation of the consented scheme proposals and would continue to offer public and heritage benefits that are considered to balance the less than substantial harm which would fall out of them. Furthermore, none of the proposals would cause any harm to the character and appearance of the Kingsway Conservation Area.

For the reasons explained above, it is considered that the proposed works would preserve the special interest of the listed building and the conservation area in accordance with Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act. The proposals would comply with the policy of the NPPF and all other relevant strategic policies of the Camden's Local Plan, notably D2 Heritage and the London Plan (2021) Policy CH1 insofar as they relate to the historic environment.

