

**Kings Keely Limited**  
August 2021



**HERITAGE NOTE**  
**KODAK HOUSE, 61 – 65 KINGSWAY**

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## Appendix 1

STATUTORY LIST DESCRIPTIONS

# 1.0 Introduction

- 1.1 This Heritage Note has been prepared on behalf of Clearbell to assess minor works to 65 Kingsway. This application follows on from consented proposals LPA ref: 2019/6088/P, and comprises minor alterations from the consented scheme. This includes alterations to a handrail within the main staircase at ground and first floors as well as an amended design to an entrance door to Keeley Street.
  
- 1.2 This report includes an assessment of the significance of the listed building and conservation area, assessment of the contribution the fabric to be altered makes to the significance of the designated assets, and followed by a determination of the impact of the proposals to this significance. 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 2021) where the assessment of heritage assets or their settings is being considered.
  
- 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

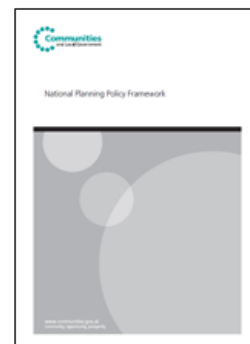
### National Policy

#### 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 (2021)

- 2.1 The revised National Planning Policy Framework (NPPF) was published on 20<sup>th</sup> July 2021, replacing the previous published 2019 and 2012 frameworks.
- 2.2 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 189).
- 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 194).
- 2.5 Paragraph 195 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 or minimise 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 An addition to the 2021 NPPF is outlined in paragraph 198. This states that local planning authorities should have regard to the importance of the retention 'in-situ' of a historic statue, plaque, memorial or monument irrespective of its designation. The paragraph goes on to suggest an explanation of historic or social context should be given rather than removal.
- 2.7 Paragraph 199 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.”*
- 2.8 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 200). 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.
- 2.9 In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 201 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.”*
- 2.10 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 202 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.”*
- 2.11 It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.
- 2.12 In the case of non-designated heritage assets, Paragraph 203 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.

- 2.13 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.
- 2.14 With regards to conservation areas and the settings of heritage assets, paragraph 206 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.”*
- 2.15 Broader design guidance is given in Chapter 12, ‘Achieving well-designed places’. The 2021 NPPF introduces the requirement for local authorities to prepare design guides or codes, consistent with the principles set out in the National Design Guide and National Model Design Code Documents. These should reflect ‘local character’ in order to create ‘beautiful and distinctive places’ (paragraph 127).
- 2.16 Paragraph 134 states that significant weight should be given to development which reflects local design polices, and/or outstanding or innovative designs which promote high levels of sustainability or help raise the ‘standard of design’ providing they conform to the ‘overall form and layout of their surroundings.

### Planning Practice Guidance (PPG) (2019)

- 2.17 The Planning Practice Guidance (PPG) was updated on 23 July 2019 and is a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance.
- 2.18 In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance and explains how the tests of harm and impact within the NPPF are to be interpreted.

### 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*

- 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 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 Planning Practice Guidance (PPG). 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 Analysing Significance in Heritage Assets Advice Note 12 (October 2019)**

- 2.25 This document provides guidance on the NPPF 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.
- 2.26 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.

## **Regional Policy**

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

- 2.2 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:
- 2.3 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”.*
- 2.4 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 adaptation*
- *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)

- 2.5 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:
- 2.6 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;...”
- 2.7 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**

- 2.8 The Kingsway Conservation Area was first designated in June 1981. The current Conservation Area Appraisal was formally adopted by the council in December 2001.
- 2.9 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:

2.10 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.”*

2.11 The Conservation Area Appraisal contains the following guidance which are considered to be of relevance:

2.12 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.”*

2.13 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**

<b>SIGNIFICANCE</b>	<b>EXAMPLES</b>
<b>Very High</b>	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.
<b>High</b>	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).
<b>Good</b>	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).
<b>Medium/ Moderate</b>	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).
<b>Low</b>	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.
<b>Negligible</b>	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.
<b>Neutral/ None</b>	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 20<sup>th</sup> 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 9<sup>th</sup> 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 17<sup>th</sup> 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 17<sup>th</sup> century.

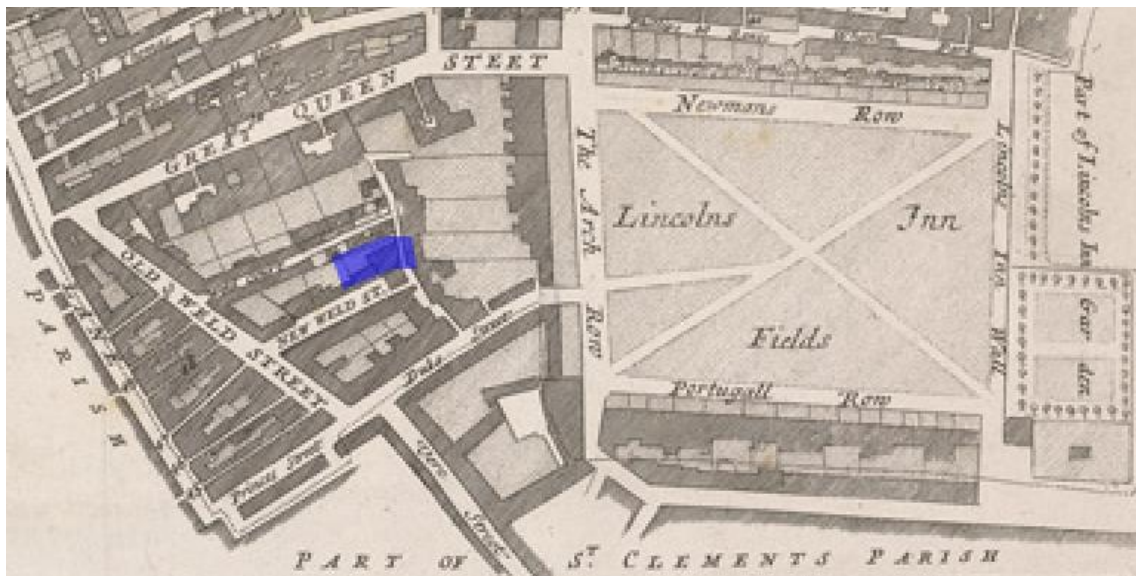


Figure 2 Extract from 'A Mapp of the Parish of St Giles's in the Fields' by Richard Blome, 1720. A great deal of development had occurred in the area by this time, with a very different street pattern to that found at present. The approximate location of the site is marked in blue



- 4.3 By the 19<sup>th</sup> 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.

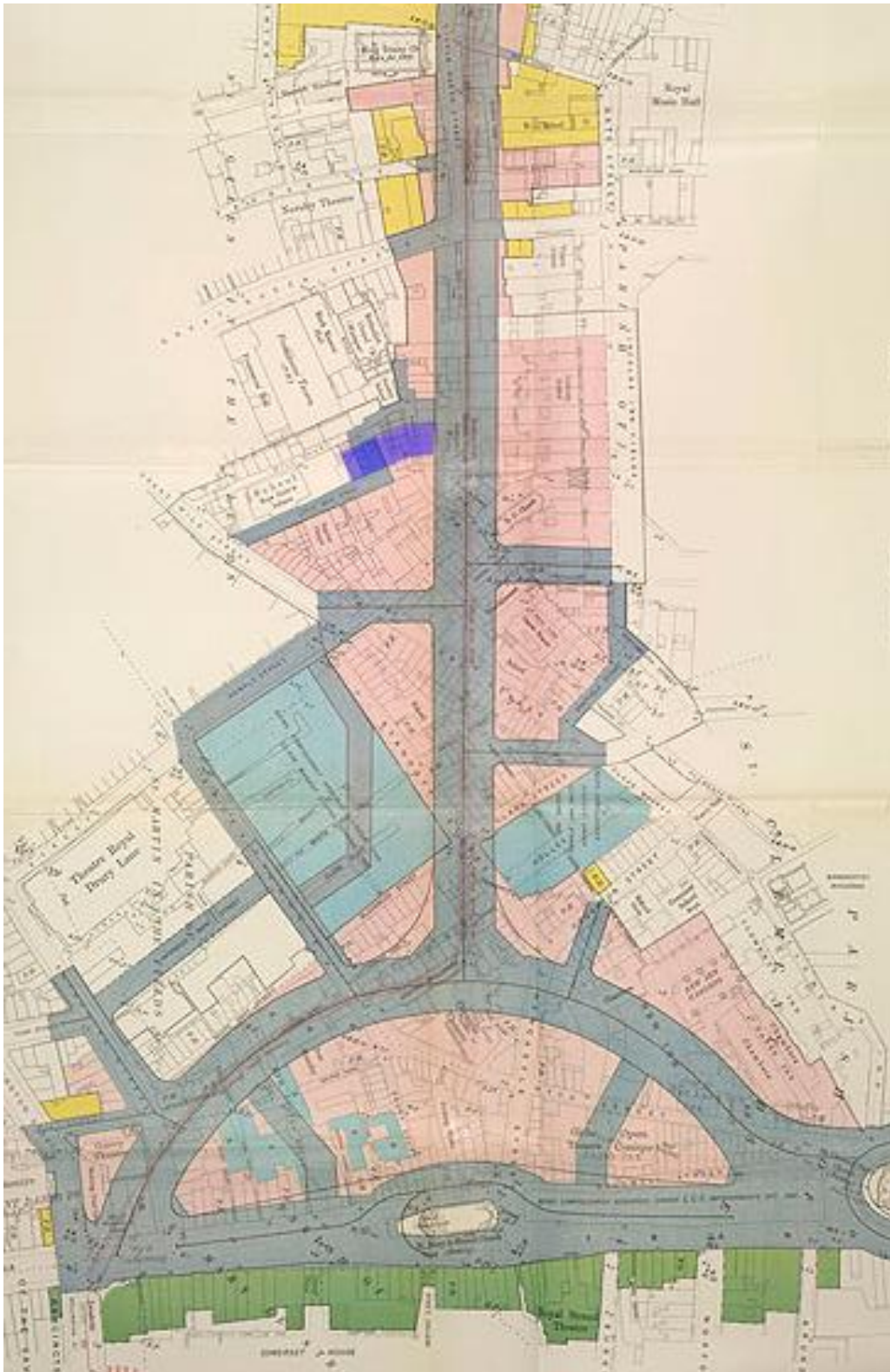


Figure 4 Extract from the Report of the Royal Commission on cross-river traffic in London showing Kingsway. The approximate location of the site is marked in dark blue.

- 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 8<sup>th</sup> 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.

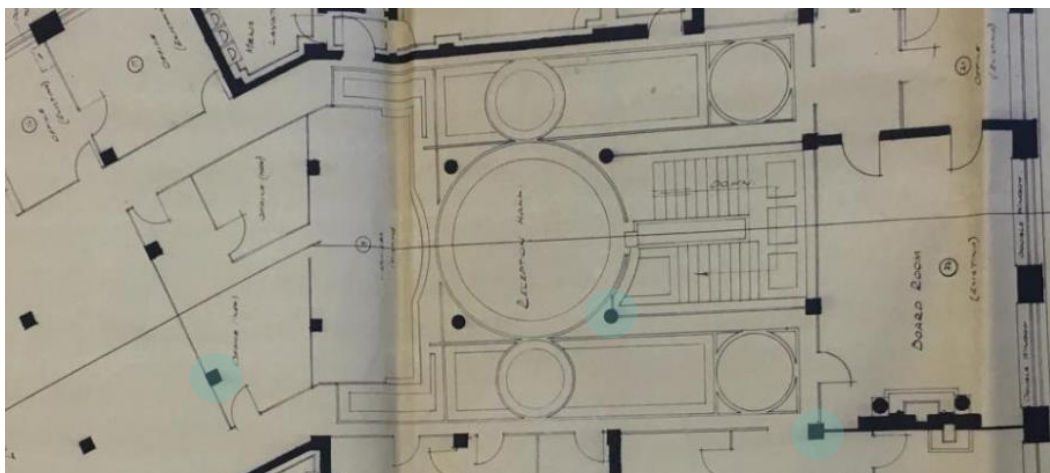


Figure 10. First floor plan, 1939. Note variation in plan form of supports, highlighted in blue.

- 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 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 13 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.*

- 5.13 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



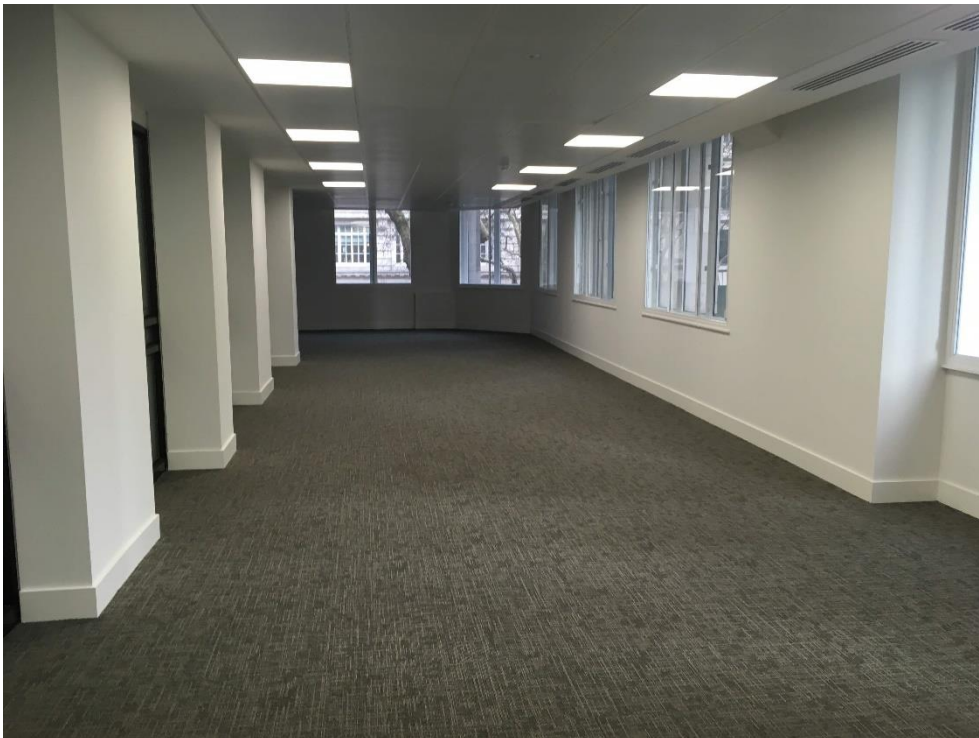
seen below. The fireplace, its mantelpiece, hearth and its timber surround however appear to have survived, repositioned within the first floor and reoriented.



*Figure 14 View of the first floor board room 1972 (collage)*



*Figure 15 The fireplace within the first floor boardroom 1972 (Collage)*



*Figure 16 View of the first floor looking east adjacent to the Keeley Street elevation (2019)*



*Figure 17 The first floor repositioned boardroom fireplace (2019)*

- 5.14 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. 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 18 Interior of the principal entry hall at ground floor level, 1972 (Collage. Note solid wall to the right of the stairs.

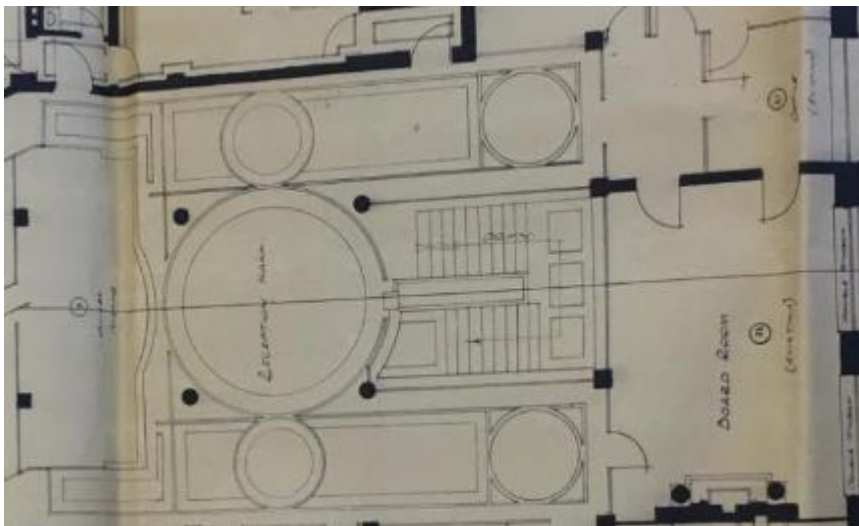


Figure 19. 1939 First floor ground plan. Note 'cashiers desk' to the left of the reception hall, suggesting this hall was not enclosed from the full expanse of the office floor to the left.

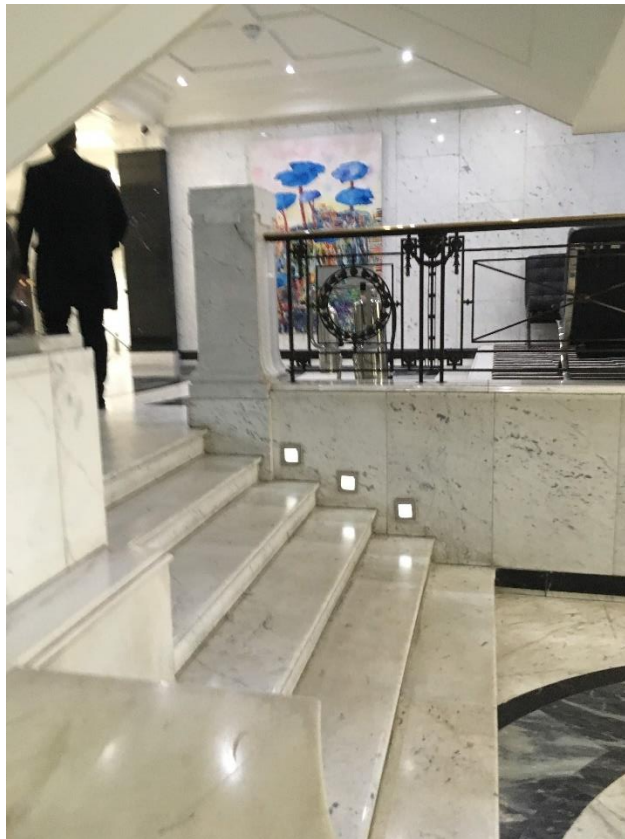


Figure 20. Interior of ground floor hall, showing loss of original wall which marked the boundary of the shop.



Figure 21 Interior of the principal entry hall at first floor level, 1972 (Collage). Note glazed screens to boardroom now removed.



*Figure 22 View of the interior of the principal entry hall (2019)*



*Figure 23 The principal staircase (2019)*



Figure 24 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.

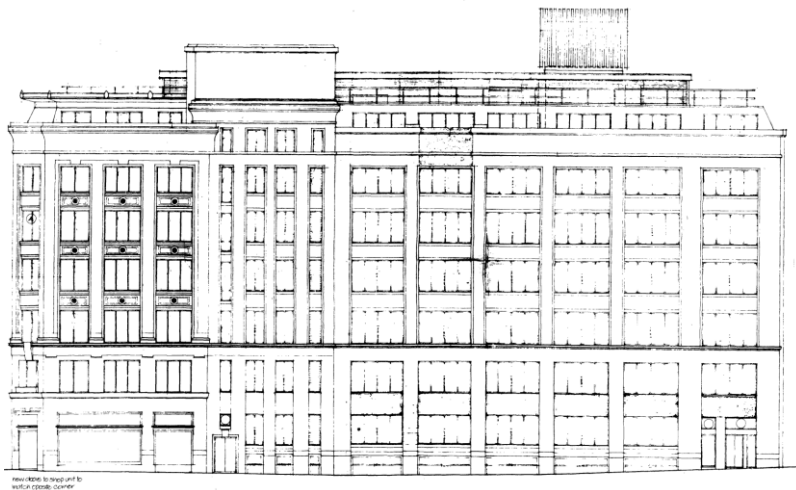


Figure 25 Extract from application 8670207 showing the proposed Kingsway and Keeley Street elevations (top) and the Wild Court elevation. Note additional lift overrun.

### Summary of Significance

- 5.15 Overall, Kodak House is considered to hold a **moderate/good** level of significance in heritage terms.
- 5.16 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.

- 5.17 The 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.



## Kingsway Conservation Area

- 5.19 The Kingsway Conservation Area was first designated on the 16<sup>th</sup> June 1981. The Conservation Area is focused around the Kingsway.



Figure 26 Map of the Kingsway Conservation Area showing the listed buildings (dark red) and the positive buildings (hatched)

- 5.20 Within the Conservation Area the majority of the built form was constructed in the early 20<sup>th</sup> century and are predominantly large-scale commercial buildings constructed in a Neo-classical architectural style. A number of these buildings are statutorily designated.
- 5.21 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.
- 5.22 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.
- 5.23 There has been very little development within the Conservation Area ensuring that the street retains its strong Edwardian composition.

### Overall Significance

- 5.24 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

5.25 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"'*.

5.26 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.

5.27 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 Proposals

### Alterations to staircase

- 6.1 The proposals comprise the raising of the existing decorative metal bannisters to the main stair at ground and first floors. The consented works (2019/6088/P) included a new floor finish to the ground and first floors. As such the floor level is slightly raised, requiring the lifting of the handrail in order to avoid the replacement of the existing metal bannisters. It is proposed that the existing panels are retained, with a series of new metal panels fixed beneath. The new panels have been designed to retain the geometric style of the existing, complimenting the restrained classical aesthetic. As noted within the historic development section the existing bannisters have been historically repositioned throughout the building's history, and the proposals within this context are therefore seen as an appropriate solution which ensures the retention of the decorative detail to the staircase. The proposals are therefore considered to comprise a neutral impact to the listed building.

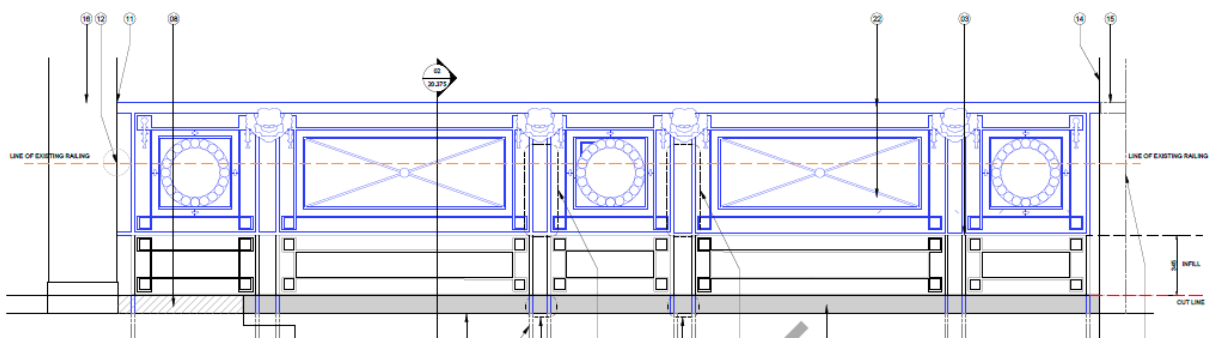


Figure 27. Proposed alteration to staircase railing.

### Alterations to Doorway

- 6.2 The proposals are for replacement of existing double doors on Keeley Street with a new set of 2no single doors, creating a comparable overall doorway space within the façade. This proposal will not alter the character of the consented proposals, which reflect a contemporary design. Notwithstanding this, it is noted that Keeley Street is a subservient elevation and the significance of the listed building overwhelmingly resides elsewhere. The proposals are overall therefore to comprise a **neutral** impact to both the the significance of the listed building and conservation area.

Scope under construct  
approved application (i  
consent number)



Figure 28. Proposed Keeley Street Elevation.

## 7.0 Conclusion

- 7.1 This Heritage Note has been produced to accompany proposals for minor works to 65 Kingsway. This report solely seeks to assess the impact of the scheme on the historic environment.
- 7.2 The principle of the 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. This includes the balustrade to the main stair, which has been historically repositioned throughout the building's history.
- 7.3 Alterations to the Keeley Street façade were approved under previous applications and the current proposals remain within the philosophy of these approved alterations, replacing a new double door with two single doors.
- 7.4 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

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### 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