

19 August 2021

FAO: Ms Elaine Quigley
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Dear Madam

**TOWN AND COUNTRY PLANNING ACT 1990
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990 (AS AMENDED)
APPLICATION FOR FULL PLANNING PERMISSION AND LISTED BUILDING CONSENT FOR PROPOSED
WORKS AT: KODAK HOUSE, 65 KINGSWAY, LONDON, WC2B 6TD**

We are instructed on behalf of Kings Keeley Limited to submit an application for full planning permission and listed building consent (LBC) for minor works at Kodak House, 65 Kingsway, London, WC2B 6TD.

This application has been submitted via the Planning Portal (Ref: PP-10126341) and comprises of the following information:

- This Cover Letter, prepared by Savills
- Completed Application Form for Full planning permission and Listed Building Consent and Certificate B
- Heritage Advice Note, prepared by Bidwells
- Design & Access Statement, prepared by Barr Gazetas
- Completed CIL Form
- Drawings, prepared by Barr Gazetas as follows:

Drawing Number	Drawing title	Scale and Size
1914-BG-01-ZZ-DR-A-00.100_REV P4	Site Location Plan	1:1250 @ A1 1:2500 @ A3
1914-BG-01-00-DR-A-20.202_REV P1	Existing Ground Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-00-DR-A-20.202_REV P1	Proposed Ground Floor Plan	1:100 @ A1 1:200 @ A3
1914-BG-01-ZZ-DR-A-20.271_REV P1	Existing Keeley Street Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-00-DR-A-20.271_REV P1	Proposed Keeley Street Elevation	1:100 @ A1 1:200 @ A3
1914-BG-01-00-DR-A-20.370_REV P1	Kingsway Reception - First Floor Reference Plan and Existing Photos	1:100 @ A1 1:200 @ A3
1914-BG-01-00-DR-A-20.374_REV P1	Kingsway Reception - First Floor	1:100 @ A1 1:200 @ A3
1914-BG-01-00-DR-A-20.375_REV P1	First Floor Historic Railing Detail	1:100 @ A1 1:200 @ A3

Description of Development

Planning permission and LBC is sought from Camden Council for the following description of development:

"Replacement of existing double doors on Keeley Street facing elevation with two single doors, alterations to the internal staircase handrail at ground and first floor level and associated works".

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In summary this includes the following works:

- Alterations to the first floor staircase railings
- Replacement of existing double doors on the Keeley Street elevation with two single doors
- Internal fire escape arrangement amendment to Soho Coffee

A detailed description of the works can be found in the Design and Access Statement and Heritage Advice Note which form part of our submission.

Site Description

The application site is located within the London Borough of Camden. Kodak House comprises a 7-storey office (Class B1) and mixed-use building with a basement and attic storey, located on the western side of Kingsway, between Wild Court and Keeley Street. The building is statutorily listed, with Grade II status, having been added to the Statutory List for Building of Architectural or Historic Interest on 8 September 1971. The building lies within the Kingsway Conservation Area; and the site also forms part of the Holborn 'Central London Frontage' zoning, designated as a protected secondary frontage. There are two existing retail units located at ground floor of the office block, currently occupied by tenants, Soho Coffee Co and Eton (a clothing store), which remain unaffected by the scheme.

Planning Context

Planning (Listed Buildings and Conservation Areas) Act 1990

Listed Building Consent is required for any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest.

It is a statutory duty when considering works/development that affect a listed building or its setting that special regard should be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. It is also a duty when considering whether to grant planning permission for development within a conservation area that the local planning authority should pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

National Planning Policy Framework (2019)

The NPPF requires an application to describe the significance of any heritage assets affected and requires local authorities (LPAs) to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset).

The NPPF states that LPAs should take into account whether the proposals are sustaining and enhancing the significance of heritage assets and putting them into viable uses that are consistent with their conservation and that, in considering what impact the proposals might have on the significance of a designated heritage asset, great weight should be given to their conservation. It also states that any harm to a designated heritage asset should require clear and convincing justification.

Development Plan Policy

The development plan comprises The Camden Local Plan (2017) and the Site Allocations Plan (2013). Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings. These are specifically addressed in policies D1 'Design' and D2 'Heritage' in The Camden Local Plan, and within the Camden Planning Guidance on Design (2019) and Amenity (2018). In addition, Kingsway Conservation Area Statement (2001) provides an analysis of the character and appearance of Kingsway Conservation Area.



Background

Camden Council formally granted Planning permission and Listed Building Consent (Ref: 2019/6270/L & 2019/6088/P) ('the consented scheme') on 1 May 2020 for the following description of development:

"Alterations to the existing building including recladding of the 6th floor extension together with new window openings, rebuilding and recladding of the 7th floor extension with new window openings, installation of new plant screen on the roof, replacement of all windows, reinstatement of window openings and new entrance on the ground floor Keeley Street elevation, installation of new canopy, metal signage detailing "Kodak House" on Kingsway entrance and on new Keeley Street entrance, creation of communal terrace, green roof and associated railings at 8th floor level all in association with the existing mixed use building".

Following this a further LBC (ref: 2021/0471/L) was approved by Camden Council on 13 April 2021 for *"alterations to the existing building including recladding of the 6th floor extension together with new window openings, rebuilding and recladding of the 7th floor extension with new window openings, installation of new plant screen on the roof, replacement of all windows, reinstatement of window openings and new entrance on the ground floor Keeley Street elevation, installation of new canopy, metal signage detailing "Kodak House" on Kingsway entrance and on new Keeley Street entrance, creation of communal terrace, green roof and associated railings at 8th floor level"*

In parallel a non-material amendment application (ref: 2021/0472/P) was approved on 19 April 2021 for an amendment to condition 2 (approved plans) of planning permission granted on 01/05/2020 under ref 2019/6088/P.

Planning Assessment

Alterations to First Floor Staircase Railings

The consented works include a new floor finish to the first floor. As such the finished floor level will become approx. 105mm higher in order to accommodate build-ups, services and site condition. This therefore requires the handrails to be lifted and in order to avoid the replacement of the historic railings it is proposed to carefully remove the existing and re-instate these at a compliant height by adding matching decorative inserts at the base. Where required, entirely new railings will be made up of existing matching decorative metal panels that have been previously repositioned to elsewhere on the floor plate.

The heritage statement prepared by Bidwells states that the 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.

New Doors to Keeley Street

The proposals are for the replacement of the existing double doors with a new set of 2no single doors, creating a comparable overall doorway space within the façade. This arrangement is required to suit the fire escape arrangement internally. The heritage statement confirms that the changes to the door will not alter the character of the consented proposals and is considered to have a neutral impact to both the significance of the listed building and conservation area.

Summary

Overall, the above proposed works are not considered to cause detrimental harm to the listed building or to the character and appearance of the Conservation Area. Rather, the proposed works seek to retain and enhance the consented scheme and is considered to have a neutral impact on the listed building. The application proposals are considered to accord with Policies D1 and D2.



The tests at paragraphs 193 - 196 of the NPPF do not apply, as the proposals will not result in any harm to the listed building. In any case, the proposed scheme demonstrates a public benefit as it secures the building's optimum viable use, which is consistent with the original use of the building.

We trust that you have all the information needed to register, validate and determine our application. However, please do not hesitate to contact me or my colleague Raveen Matharu should you have any queries.

Yours sincerely,



Mike Washbourne MRICS
Director

Enc. Items enclosed as described