



GERALDEVE

72 Welbeck Street, London W1G 0AY
Tel. +44 (0)20 7493 3338
geraldeve.com

Planning and Built Environment
London Borough of Camden
5 Pancras Square
London
N1C 4AG

FAO: Laura Dorbeck and Rose Todd

23 February 2022

Our ref: LJW/AKG/KFO/U0006860

Your ref: 2021/1058/P & 2021/1106/L / PP-10573745 & PP-10574557

Dear Laura

**Space House, 1 Kemble Street and 43-59 Kingsway, London, WC2B 4TE
Town and Country Planning Act 1990 (as amended) – Section 96a
Planning (Listed Buildings and Conservation Areas) Act 1990 – Section 19**

We write on behalf of our client, SLQR Trustee No.1 Limited SLQR Trustee No.2 Limited as co-trustees of SQLR Trustee No.3, further to the formal Post Approval Agreement (PAA) meetings held on the 12 January 2022 and 9 February 2022 and site visit on 28 January 2022 to apply for a non-material amendment application to planning permission ref. 2021/1058/P, and to apply for a section 19 application to listed building consent ref. 2021/1106/L (both dated 30 September 2021). This is in respect of the development of Space House, 1 Kemble Street and 43-59 Kingsway, London, WC2B 4TS ('the Site') where planning permission and listed building consent were granted on 30 September 2021.

This application seeks to amend condition 2 of planning permission ref. 2021/1058/P and condition 2 of listed building consent ref. 2021/1106/L as follows:

- i) to reflect discoveries made on site during the construction process which require amendments to the previously approved drawings;
- ii) to reflect the correct demolition drawings; and
- iii) To reflect changes resulting from site discoveries and detailed design.

The proposals will ensure that the special interest of the Grade II listed building is preserved and enhanced, whilst enabling the delivery of the approved Development.

Planning History

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

The planning permission and listed building consent were implemented on 1 March 2021 and are the operative permissions for the development.

On 16 March 2021 planning permission (ref. 2021/0351/P) and associated listed building application (ref. 2021/0318/L) were approved on site for the following:

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

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

Works pursuant to these planning and listed building consent applications have commenced on site.

On the 30 September 2021 a Section 73 application (ref. 2021/1058/P) and a Section 19 application (ref. 2021/1106/L) were approved for the following:

Section 73: “Variation of conditions 2 and 3 (approved drawings), 5 (long stay cycle parking), and 7 (Electric vehicle charging points) of planning permission reference 2019/2773/P granted 26/11/2019 for the erection of extensions to tower and Kingsway blocks, new glazing to the existing enclosure of the southern external stair on Kingsway; enclosure of the redundant petrol filling station area; façade 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 / events space (sui generis) (summary). Amendments include: external and internal design changes to the approved scheme including installation of green roof to Kingsway roof; changes to the BMU equipment and AOVs; changes to windows; revisions to basement layouts; alterations to approved car parking, cycle parking and landscaping; correction of red line boundary; changes to proposed floor areas.”

Section 19: “Variation of conditions 2 (approved drawings), 3 (details) of listed building consent reference 2019/2790/L granted 26/11/2019 for the erection of extensions to tower and Kingsway blocks, new glazing to the existing enclosure of the southern external stair on Kingsway; enclosure of the redundant petrol filling station area; façade 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 / events space (sui generis) (summary). Amendments include: external and internal design changes to the approved scheme including installation of green roof to Kingsway roof and changes to windows; changes to the BMU equipment and AOVs; revisions to basement layouts; alterations to approved car parking, cycle parking and landscaping; correction of red line boundary; removal of reference to green walls and addition of new details to condition 3.”

Conditions 3 part a, b, d, h, i, k and l pursuant to listed building consent ref: 2021/1106/L have now been approved.

An application to discharge condition 3c is pending determination (ref: 2022/0607/L).

Pre-Application Discussions

During PAA meetings held virtually on the 12 January and 9 February, and a site visit on 28 January 2022, Camden planning and conservation officers advised that the proposals were acceptable and could be sought via a non-material amendment and Section 19 applications.

Local Development Framework

The London Borough of Camden's Local Development Framework comprises of the following planning policy documents: The National Planning Policy Framework (2021), the London Plan (2021) and the Camden Local Plan (2017).

Statutory Legislation

Statute regarding the heritage environment is relevant to this application. The surrounding environment has been carefully considered in the development of the proposals having regard for the statutory legislation set out below.

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

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

Proposals

The proposed amendments to the scheme, are considered in the following categories:

1. Additional required demolition;
2. Retention of fabric in areas previously consented for demolition;
3. Design development changes; and
4. Regularising the demolition drawings.

The demolition scope changes have been brought about following site discovery findings and the further development of the design towards construction stage while continuing to ensure that the special interest of the listed building is preserved and enhanced.

1. New areas of demolition

The Squire and Partners Design Document sets out in detail the additional areas that require demolition. These additional areas have become apparent during the construction stage and must be demolished to implement the consented design. The below summarises the elements of the scheme where discoveries have been made: .

- Screed removal (Basement Level 02, Basement Level 01, Levels 01 - 15);
- Updated landscape grating penetration (Ground Floor Level);
- Mosaic tile wall removal (Ground Floor Level);
- Blockwork wall removal (Mezzanine Floor Level, Levels 01 - 07);
- Removal of an existing wall at Mezzanine Floor Level;
- Removal of the existing canopy at Mezzanine Floor Level;
- Soft spot removal at Level 01 post strip-out;
- Removal of existing concrete pavers (Level 01 and Level 02);
- Removal of the existing composite desk slab (Level 2 and Level 15);
- Lift shaft concrete slab removal (Level 08 and Level 15);
- Removal of Level 09 existing extension; and
- Stair core walls.

Donald Insall Associates (DIA) have reviewed the proposed changes and have provided a Heritage Note, dated 18 February 2022, to support these applications.

The Note states that the site discoveries made during the construction period, that were not previously known to exist, are of no interest (for example the soft spots) or are of some interest (for example the areas of mosaic tile to the ground floor piers). However, due to the poor and fragmented condition of these discoveries, such as the

mosaic tile, they are of low significance in this area. The discoveries are also located in an area with consent for removal, and their removal as discussed and agreed with Camden planning and conservation officers, would cause no harm to the significance of the listed building. Furthermore, the removal of these elements is required to implement the approved scheme and to enable the public benefits to be delivered.

2. Areas where fabric is now being retained

On site during the construction phase, parts of the building that were consented for demolition under application reference 2021/1058/P and 2021/1106/L are no longer required for demolition to implement the consented design. It is therefore proposed that these parts of the building will be retained. These parts are detailed below.

- Slabs at Basement Level 01 and Ground Floor Level to be retained.
- Previously consented demolition is no longer required in different areas at Ground Floor Level and from Level 01 to Level 08.
- A structural beam was previously consented for demolition at Mezzanine Floor Level, however the removal of this beam is no longer required.

The submitted Squire and Partners Design Document (Section 2) sets out in detail these areas on site where consented demolition is no longer required.

3. Design development changes

The design development has evolved and as a result, the below changes are proposed.

- New service penetrations are proposed at Basement Level 01.
- Removal of the southern stair enclosure frame and secondary structure at Ground Floor Level. This will be replaced with a like for like frame as described under the consented S73 design.
- Mosaic tile discovery at Ground Floor Level. Mosaic tiles and brickwork finish have been found post strip-out in the two central columns to the lift lobby and the Kingsway reception lift shaft walls. The mosaic and brickwork are in poor condition, so Camden has agreed to remove these finishes to achieve the consented design.

Section 2 of the Design Document prepared by Squire and Partners demonstrates these changes in detail.

4. Regularise the demolition drawings

A full demolition drawing pack has been submitted with these applications to regularise demolition scope approved under the Section 73 and Section 19 permissions (refs: 2021/1058/P and 2021/1106/L). The revised demolition drawings are not reflected on the decision notices issued on 30 September 2021 and as such these applications seek to regularise this and ensure that the correct demolition drawings are listed on subsequent decision notices.

Page 28 of the Design Document, prepared by Squire and Partners, provides a drawing schedule of the drawings submitted with these applications.

DIA's Note confirms that the submitted demolition drawings reflect the works approved under the permissions dated 30 September 2021.

Submission Documents

The following documents have been submitted in support of this application via planning portal (PP-10573745 & PP-10574557):

- Completed application form (1 x NMA and 1 x s19) and certificates;
- Site plan;
- Demolition Drawings, prepared by Squire and Partners;
- Design Document (including Drawing Schedule and structural commentary from Pell Frischmann), prepared

- by Squire and Partners; and
- Heritage Note, prepared by Donald Insall Associates.

The requisite application fee of £262 (plus £28 Planning Portal admin fee) for the non-material amendment has been made concurrent to the submission of this application.

The Section 19 application is pursuant to a listed building consent, so there is therefore no application fee.

We trust the above is sufficient to ensure the validation of the applications. Should you have any questions regarding this submission please contact either Anna Gargan (020 7518 7240) or Katie Fong (020 3496 3736) of this office.

Yours faithfully



Gerald Eve LLP

AGargan@geraldeve.com

Direct tel. 020 7518 7240

Enc. As above

Appendix 1: Drawing Schedule