

Our Project Ref: SHK

17th May 2022

Laura Dorbeck (Planning Officer) and Rose Todd (Design and Conservation Officer)

London Borough of Camden Planning and Conservation

2nd Floor, 5 Pancras Square

c/o Town Hall, Judd Street

London

WC1H 9JE

Sent by Email

Dear Laura and Rose,

Introduction

We write to you following the two PAA meetings held with the applicant to support the applications for non-material amendments to the extant planning permission (ref: 2021/1058/P, as amended by NMA ref: 2022/0751/P) and listed building consent (ref: 2022/0740/L) at Space House ('the site').

This short note is to accompany Squire and Partners drawings and the 'Space House Non-Material Amendment Document', dated May 2022 which seek to update and regularise the consented demolition scope agreed through the NMA and Section 19 of 2022.

Non-Material Amendment and Section 19 Proposals

The required additional demolition relates to outer brickwork and inner blockwork layers which have been discovered in the Tower mixed-mode ventilation ducts area. The amount of brickwork and blockwork required for demolition varies on each floor, and relates to mezzanine level, first floor, second floor and third to 14th floor. Further details and drawings are set out in the document by Squire & Partners titled 'Space House Non-Material Amendment Document'.

The demolition of the identified brickwork and blockwork is required to allow for the consented reinforced concrete slabs to be installed at mezzanine to second floor. At third to 14th floor the required removal of brickwork within the tower is from the face of the existing reinforced concrete beams to allow for new reinforced concrete beams to be connected, and brickwork and blockwork from above the existing reinforced concrete beams to allow for new reinforced concrete walls to be installed.

The primary significance of the Tower and the Kingsway block 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. Internally, the buildings were originally designed as flexible 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. As part of the consent these have been stripped out. The existing brickwork and blockwork identified for demolition is rudimentary structure, finished in white paint. The simple brickwork and blockwork forms part of the basic construction of the building rather than forming a visible finish or fixture within the building's interior, and consequently is of no historic or architectural interest. Therefore, the removal of these areas of brickwork and blockwork 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 of the approved scheme to be delivered.

These proposals have been presented and discussed with planning and conservation officers during the PAA meeting on the 11 April 2022 and it was noted in an email sent and dated 21st April 2022 that Camden considered that the changes were acceptable and recognised the brickwork and blockwork does not contribute to the special architectural or historic interest of the listed building. Camden confirmed that listed building consent should be sought through a Section 19 application.

As agreed in the previous PAA meetings, the areas of brickwork and blockwork to be removed would be added to the photographic dossier, which is being compiled to collate and record all the relevant site findings during the on-going construction phase. This would include the location of the removed brickwork noted on plans. Once complete, this record will be deposited with Camden Council.

Conclusion

Donald Insall Associates

In the terms of the NPPF the proposals for localised demolition within the tower would cause no harm to the listed building and there would be no impact to the building's special interest. Overall, the proposals would ensure the delivery of the public and heritage benefits secured by the consented scheme that are considered to balance the less than substantial harm which would fall out of them. Furthermore, the proposals would cause no 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 relevant policies 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.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Kelly', with a stylized flourish at the end.

Joanna Kelly IHBC
Associate