



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

FOA Laura Dorbeck & Rose Todd

Our ref: LJW/AKG/KFO/U0006860

**Your ref: 2021/1058/P & 2021/1106/L //
PP-11250527 & PP-11250724**

17 May 2022

Dear Laura and Rose

**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**

Following the meetings held with you on 11 April and 9 May 2022, 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, to apply for non-material amendments to planning permission ref. 2021/1058/P, and to apply for section 19 amendments to listed building consent ref. 2021/1106/L (both dated 30 September 2021). This is in respect of the implemented Development of Space House, 1 Kemble Street and 43-59 Kingsway, London, WC2B 4TS ('the Site') where planning permission and listed building consent were first approved on 26 November 2019.

This application seeks to amend condition 2 of planning permission ref. 2021/1058/P (as amended by NMA ref: 2022/0751/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, in particular in respect of the brickwork to the tower mixed-mode ventilation duct between mezzanine level and levels 1-14.

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.

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 both approved for amendments to the scheme, including external and internal design changes to the approved scheme. These amendments included 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; changes to the proposed floor areas, correction of red line boundary; removal of reference to green walls and addition of new details to condition 3.

The Section 73 and Section 19 were implemented on 28 March 2022.

On the 5 April 2022, a Section 96a application (ref. 2022/0751/P) and a Section 19 application (ref. 2022/0740/L) were approved, namely for changes to areas of demolition and regularisation of demolition drawings, and minor design changes. The works approved under these applications have been implemented.

Therefore the operative permissions are: planning permission ref: 2021/1058/P, dated 30 September (as amended) and listed building consent ref: 2022/0740/L, dated 5 April 2022.

Several conditions pursuant to the operative planning permission and listed building consent have now been discharged.

Pre-Application Discussions

The proposals submitted under these applications have been discussed with Camden planning and conservation officers at meetings held on 11 April and 9 May 2022. Officers considered that the proposals were acceptable in principle and that an NMA and associated s19 application should be submitted.

Local Development Framework

The London Borough of Camden's Local Development Framework comprises of the following planning policy documents: 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

These applications seek permission for the proposed removal of the Tower mixed mode ventilation duct brickwork (Mezzanine Level, and between Levels 01 -14). It is proposed that the outer brickwork layer at Mezzanine Floor Level will be removed, whilst the outer and inner brickwork layer on Levels 01 – 14 will be removed. This will allow for new reinforced concrete (RC) slabs to be installed at Mezzanine Floor Level and Levels 01 - 02, and RC beams to be connected from Levels 03 - 14.

The RC wall behind the brickwork will be retained. This change has 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.

The Squire & Partners Design Document sets out in detail the additional area that requires demolition. The additional area has become apparent during the construction stage and must be demolished to implement the consented design.

Donald Insall Associates (DIA) have reviewed the proposed changes and have provided a Heritage Note, dated 17 May 2022, to support these applications.

The Heritage Note states that the discovery of the Tower mixed mode ventilation duct brickwork on site, made during the construction period, which was not previously known to exist, is of no historic or architectural interest. DIA state that the brickwork is simple and forms part of the basic construction of the building rather than forming a visible finish or fixture within the building's interior.

In the terms of the NPPF tests, DIA conclude that the proposals would cause no harm to the listed building and there would be no impact to the building's special interest. Furthermore, the proposals would cause no harm to the character and appearance of the Kingsway Conservation Area. Overall, the proposals would ensure the delivery of the public and heritage benefits secured by the approved development.

Therefore, the proposals meet the statutory tests and comply with national and local policy insofar as they relate to the historic environment.

Conditions

Since the approval of the extant Section 19 consent (ref: 2022/0740/L) condition 3 part e has been discharged in part. It is requested that any decision notice issued in respect of this application reflect this partial approval.

Submission Documents

The following documents have been submitted in support of this application via planning portal (PP-11250527 & PP-11250724):

- Completed application form (1 x NMA and 1 x s19) and certificates;
- Site plan;
- Demolition Drawings (clean and bubbled), prepared by Squire and Partners;
- Design Document (including Drawing Schedule), prepared by Squire and Partners; and
- Heritage Note, prepared by Donald Insall Associates.

The requisite application fee of £234 (plus £32.20 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 and has 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