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FOA Laura Dorbeck & Rose Todd

Our ref: LJW/AKG/KFO/U0006860

**Your ref: 2022/2170/P & 2022/2134/L //
PP-11431259 & PP-11431273**

1 August 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 PAA meeting held with you on 13 July 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, dated 30 September 2021 (as amended by NMA ref: 2022/0751/P, dated 5 April 2022 and NMA ref: 2022/2170/P, dated 28 June 2022), and to apply for section 19 amendments to listed building consent ref. 2022/2134/L (dated 28 June 2022). 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 NMAs refs: 2022/0751/P and ref: 2022/2170/P) and condition 2 of listed building consent ref. 2022/2134/L as follows:

- 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 Kingsway loading bay and Kingsway stair support at level 7.

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. These applications have been implemented.

On the 28 June 2022, a Section 96a application (ref. 2022/2170/P) and a Section 19 application (ref. 2022/2134/L) were approved, namely for changes to areas of demolition to tower lightwell. The works approved under these applications have been implemented.

Therefore, the operative permissions are: planning permission ref: 2021/1058/P, dated 30 September 2021 (as amended) and listed building consent ref: 2022/2134/L, dated 28 June 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 the PAA meeting held on 13 July 2022. Officers considered that the proposals were acceptable in principle and that an NMA application 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 a small section of the Kingsway Block loading bay and a small section of Kingsway Block Stair Support Level 7 stair support.

Kingsway Block Loading Bay

The west elevation of the Kingsway block was largely approved for demolition, with the exception of a small area (as shown in Squire and Partners' Design Document on page 6). The existing masonry walls are formed of two layers. The internal layer is in poor condition and constructed of mismatched brick and blockwork.

It is proposed that the internal layer of masonry brickwork (indicated on Squire and Partner's revised drawing 18077-SQP-01-ZZ-DE-A-PL01304) is removed for the following two reasons:

- a) The internal masonry brickwork layer is too close to the consented lift shaft. As a result, the consented lift shaft cannot be constructed with the existing masonry layer in place; and
- b) The internal masonry brickwork layer is of a poor condition and is structurally unstable.

Prior to the removal of the internal masonry brickwork layer, the existing wall will be photographed and added to the architectural dossier to record the condition.

During the pre-application meeting, Camden officers requested details of the methodology for removing the brickwork. The proposed methodology for the brick removal is provided on page 7 of the Design Document, prepared by Squire & Partners.

Donald Insall Associates (DIA) have reviewed the proposed changes and have provided a Heritage Note, dated 25 July 2022, to support these applications.

The Heritage Note states that the Kingsway the west elevation itself is of no architectural or historic interest. The internal masonry is rudimentary and in poor condition and was never designed to be seen and is of no architectural or historic significance. Overall, DIA consider that this minor alteration would cause no harm to the special interest of the listed building.

Kingsway Block Stair Support Level 7

To allow for the insertion of steelwork to support a consented staircase, a wall on level 7 within the Kingsway building is required to be demolished. A new wall would be constructed in the same location and the wall to the stairwell would be finished to match the existing condition (drawing ref: 18077-SQP-ZZ-07-DP-A-PL01012).

The Squire & Partners Design Document sets out in detail the additional areas that require demolition (see pages 10 and 11). The additional areas have become apparent during the construction stage and must be demolished to implement the approved Development.

DIA's Heritage Note states that the stair wall is a rudimentary internal wall forming part of the stair core and is of no architectural or historic interest. The Heritage Note confirms that the existing plan form would be preserved by the reconstruction of a new wall in the same location. The new wall would be finished to match the existing consented scheme's wall. This minor alteration would cause no harm to the special interest of the listed building.

In the terms of the NPPF tests, DIA conclude that the proposals to level 7 of the Kingsway building 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.

Concluding Remarks

Overall, the proposals would enable the buildability of the scheme and ensure the delivery of the public and heritage benefits secured by the consented scheme that are considered to balance the 'less than substantial harm' caused by them. Furthermore, the proposals would cause no harm to the character and appearance of the Kingsway Conservation Area.

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

Submission Documents

The following documents have been submitted in support of this application via planning portal (PP-11431259 & PP-11431273):

- 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

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Enc. As above