

Our Project Ref: SHK

12th October 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

This short note is to accompany Squire and Partners' drawings and the 'Space House Non-Material Amendment Document', dated October 2022 which seek to update the demolition scope approved at the site under planning permission ref. 2021/1058/P (dated 30 September 2021) as amended by non-material amendment (NMA) ref: 2022/0751/P, dated 5 April 2022, NMA ref: 2022/2170/P, dated 28 June 2022 and NMA ref: 2022/3272/P, dated 8 September 2022, and Section 19 ref: 2022/3271/L (dated 8 September 2022).

The application seeks consent for the replacement like for like of two concrete ribbed piers to the Kingsway east external elevation which were demolished without consent. The unauthorised demolition was presented to Camden in the PAA meeting held on 13th September 2022 where Camden officers indicated that the changes should be sought via a NMA and Section 19 application.

Non-Material Amendment and Section 19 Proposals

The demolition of the entire ground floor of the east elevation of the Kingsway building, apart from the two concrete ribbed piers, was permitted under the planning and listed building consent (references set out above), as demonstrated by the drawings in Squire's document. It has become apparent that as part of the enabling works the two piers which were meant to be retained were also removed and disposed of. The proposal is to fully replicate like for like and reinstate both concrete piers as part of the development works.

The accidental demolition of the concrete piers has resulted in the loss of some original fabric. The fabric itself is not of any particular intrinsic architectural or historic interest, being a concrete material made with modern techniques that can easily be replicated. A mould was taken of the existing ribbed pattern of the piers prior to their removal and so the exact finish can be replicated, ensuring that the replacement piers are as true to the original design as possible. Concrete panel sizes and finish will be submitted under planning condition 3LBC e) and samples can be provided to Camden for inspection prior to the condition report formal issue.

The proposals would result in the loss of some original fabric in the form of the two concrete piers to the Kingsway east elevation. This could be considered to cause some minor 'less than substantial harm' to the listed building in accordance with the terminology of the NPPF, however, as established above the fabric itself is of no inherent significance being formed of modern construction techniques, of which can be easily replicated. Furthermore, the piers would be replicated like for like and reinstated in their original location and as such there would be no impact on the special interest of the listed building which lies principally in the innovative use of a partial pre-cast concrete frame and how this is expressed in the two differing slab and cylindrical forms of the buildings, their spatial relationship and external elevations. Furthermore, the proposals would cause no harm to the character and appearance of the Kingsway Conservation Area as the piers would be replicated and reinstated as part of the ground floor proposals.

For the reasons explained above, it is considered that the proposed works would preserve the special interest of the listed building and the character and appearance of 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 Camden's Local Plan, notably D2 Heritage and the London Plan (2021) Policy CH1 insofar as they relate to the historic environment.

Donald Insall Associates

Yours sincerely,

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

Joanna Kelly IHBC

Associate

For and on behalf of Donald Insall Associates