

Our Project Ref: SHK

17<sup>th</sup> November 2022

Laura Dorbeck (Planning Officer) and Rose Todd (Design and Conservation Officer)  
London Borough of Camden Planning and Conservation  
2<sup>nd</sup> Floor, 5 Pancras Square  
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*Sent by Email*

Dear Laura and Rose,

### **Introduction**

This note is to accompany Squire and Partners' drawings and the 'Space House Planning Condition Discharge Report Condition 3LBC m)', dated November 2022, in order to provide supporting information for the purpose of discharging part of pending Condition 3LBC m) (ref: 2022/4760/L) pursuant to listed building consent ref: 2022/3271/L, dated 8 September 2022 in relation to the approved development at Space House (refs: 2021/1058/P and 2022/3271/L). Planning Condition 3LBC m) is as follows:

*"Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:*

*m) All new services, including BWIC, risers, pipework, cabling, air handling equipment, extracts, louvres, sprinklers, health and safety equipment, and communications technology equipment. The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works."*

### **Lightning Protection Details to be Discharged by Condition 3LBC m)**

The Kingsway building already has sufficient existing lightning protection and the works proposed therefore relate only to the Tower. The Tower building requires the installation of essential lightning protection equipment in order to protect it in case of a lightning strike. The consented design proposed to use the steel structure to conduct lightning, however during the detailed design stage it has become clear that the existing rebar structure does not provide a path to ground.

The proposals require the installation of twelve 8mm wide rods stretching from the roof down the façade of the building to level 2, where the rod will enter the building and connect into the existing rebar structure so as to provide a path to ground. The locations of the rods are shown on plan in Fig. 2.1.1 in Squire's document. It should be noted that originally 16 lightning rods were needed, but this has been reduced to 12, lessening their visual impact. It is also notable that whilst 12 rods are the minimum quantity required to meet the British Standard it also allows the rods to be positioned on the Y columns centres ensuring visual consistency and regular spacing. The visual impact has also been mitigated by ensuring the rods follow the centre of the cruciform along the mortar joints as far as possible down the expressed structure of the building and under the soffit of level 2. The rods would have a PVC cover in a silver/grey colour, mimicking the colour of the concrete closely. The rods would be fixed by a proprietary clip screwed to the face of the pre-cast concrete unit. Due to this method of fixing the rods could be readily removed, and would be reversible, with minimal damage to the surface which could be made good if a less intrusive option became available in the future. Camden planning and design officers viewed a section of the unfixed sample rod on site on the 8<sup>th</sup> November 2022. Squire's document includes four verified views to show the impact on the proposals.

Squire's document provides further details on other methods which were discounted because they were either more visually intrusive or because they were not suitable for other reasons. Initially it was sought to use an internal route which would have had no impact on the external facades of the Tower, however a feasible solution could not be found. Another design solution considered was an early streamer emission (ESE) system, more commonly known as a lightning spike. This system complies with French building regulation standards, however it is not recognised by British standards (BS EN 62305) and therefore cannot be pursued on site. Considering the building's special architectural and historic interest the design team consulted with the insurance company for the building on whether this system could be acceptable in this case, but they advised it would not be.

## **Conclusion**

To ensure the Tower building complies with British Standards for lightning protection (BS EN 62305) the only satisfactory solution from both a safety point of view, building regulations and the insurers of the building is the installation of the 12 rods as summarised in this letter. This is essential work for the building which would result in some minor visual impact; this visual impact would be mitigated as far as possible through positioning and colour of the PVC covering to the rods. The verified views demonstrate that the proposals would have limited impact in street views and on the setting of the Kingsway Conservation Area, only being noticeable in closer views from around the base of the Tower building. A number of different options have been explored by the design team and the current proposal is considered to be the most appropriate in terms of sensitivity to the special interest of the listed building and acceptability in safety and insurance terms.

Overall, these essential proposals, which have been discussed and finalised through pre-application discussions with Camden planning and conservation officers, would substantially 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, namely para 206, and all other relevant strategic policies of Camden's Local Plan, notably D2 Heritage and the London Plan (2021) Policy HC1 insofar as they relate to the historic environment.

Yours sincerely,



**Joanna Kelly IHBC**

Associate

For and on behalf of Donald Insall Associates