



ENGLISH HERITAGE

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Miss Sue Brown
City of Westminster
Department of Planning
Westminster City Hall, 64 Victoria Street
London
SW1E 6QP

Direct Dial: 020 7973 3780
Direct Fax: 020 7973 3792

Our ref: P00442511

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Dear Miss Brown

KINGS COLLEGE 160 STRAND LONDON WC2R 1JA

Thank you for your letters consulting English Heritage on applications for planning permission and listed building consent, 14/12215/FULL and 14/12216/LBC for the demolition and rebuilding of no's 154-158 Strand, rebuilding of 152-3 Strand behind retained facades, the extension of the Strand building and the works to the quadrangle building and courtyard. This reply covers both applications for planning permission and listed building consent.

English Heritage, along with officers from Westminster City Council, have for several years been involved with highly constructive discussions with King's College regarding many aspects of the management of their historic estate in central London. These current proposals, relating principally to the Strand elevation, have been the subject of over a year of pre-application discussions between English Heritage, Westminster City Council and King's.

The King's campus lies within the boundaries of the Strand Conservation Area and includes, or adjoins a number of highly significant listed buildings. It is a site of considerable architectural and historic significance. Westminster City Council's Strand Conservation Area audit, adopted in 2003, identifies clearly this significance, as do the very comprehensive Design and Access Statements submitted as part of these applications.

The Strand is a thoroughfare of considerable antiquity, providing the principal link between the City of London and the City of Westminster since at least pre Norman times. Its architecture has been and remains very varied in scale and type and has changed considerably over the centuries, reflecting clearly new uses. The current proposals continue to reflect this long tradition of change.

The overall character and appearance of the Strand buildings is domestic in scale and although of varying dates is most obviously a reminder of the eighteenth and nineteenth century evolution of the Strand, particularly with respect to individual plot



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

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widths. Nos. 152-3 are listed at grade II. They form a neat pair of houses and their current appearance belies their earlier origins.

Nos. 154-158 Strand are seemingly a cross section of nineteenth and early twentieth century buildings in, for the size of the site, an eclectic variety of architectural styles. This is a vocabulary well reflected in the Strand to the east and west of the King's site. The block as a whole has as a neighbour to the east the 1960's redevelopment by Kings of their Strand Block, a forceful and commanding concrete building. Running south of this and giving onto the Courtyard of the College is the elegant and well-presented grade I listed original College building, classical in inspiration. To the west of the site is the similarly listed Somerset House, one of the earliest and most important "public" buildings in London and one of outstanding architectural and historic interest. The existing block sits comfortably with the scale of Somerset House, less so with the 1960s block to the east. To the north east of the block is the church of St. Mary-le-Strand, again a building of outstanding architectural and historic interest and again listed grade I.

The unlisted buildings have been altered substantially behind the Strand façade and bear all the hallmarks of decades of intensive institutional use. The pair of listed buildings have had their principal elevations less altered than their unlisted neighbours to the east but internally share the same degree of alteration. The internal condition is disappointing.

It is clear from this précis of the site and its setting that we are looking at a part of Westminster of very considerable architectural and historic sensitivity and any proposals for new work or intervention here therefore need to be given exceptionally careful consideration. The lengthy pre-application discussions referred to above reflect this imperative.

King's has long sought to improve the physical condition of its estates to ensure its outstanding educational resources function within buildings which reflect this excellence and to maintain its position, in a highly competitive environment, as one of the leading universities not just in London but the world. Recent press reports have emphasised the success and importance of London's educational establishments in a global context.

The college has reached the decision that in their current form nos. 152-158 cannot be readily adapted to provide the high standard buildings need to set to provide a background to academic work of outstanding quality and that in the overall context of the Strand Campus they fail to provide the required degree of public access and permeability into the campus. It is therefore proposed to demolish completely the unlisted Strand buildings and effectively demolish the remaining fabric behind the retained facades of the listed buildings, redevelop the site southwards towards the



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original King's block and Somerset House and extend and alter the return and southern elevations of the 1960's Strand Block.

This proposal will have an impact upon the character and appearance of the Conservation Area and the setting of and views to/from the listed buildings identified above. The loss of the unlisted buildings will change the immediate setting of Somerset House and their listed neighbours and remove a block of buildings in appearance and character are well established and sympathetic to their listed neighbours to the west and contributors to the similarly established, dynamic character of the wider Conservation Area. The works to the Strand building will improve the currently truncated and unresolved return elevation to the main entrance and in views northwards from the courtyard. The works to this courtyard and associated open spaces represent a considerable enhancement of their current, rather utilitarian appearance. I do not consider that the development will have a significant impact upon the views from within the Courtyard of Somerset House. The external refurbishment and new mansard type roof to nos. 152-152 the Strand is likely to have little substantial impact upon the assets identified above.

The impact of loss of the unlisted buildings will be immediately apparent. In pre application discussions considerable time has been given to not only the principle of the demolition /amendment of the existing but also to the nature of any building which might replace them. The existing buildings on the site needs to address this fundamental dichotomy of scale as a fundamental assessment of its quality and appropriateness.

The evolution of the design of the new is clearly set out on page 50 of the Design and Access Statement and demonstrates the consideration which has been given to producing a design which seeks to reduce the impact of a building which is overall larger than the building which it seeks to replace.

I am clear that all the existing buildings on the site, to varying degrees, make a contribution to the significance of the Strand Conservation Area and are established and appropriate neighbours to specifically designated assets. Their loss will cause harm to the eastern part of the Conservation Area.

The National Planning Policy Framework, from paragraph 132 forward considers the impact of a proposed development on the significance of a designated heritage asset and sets out that "great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of designated heritage assets of the highest significance...should be wholly exceptional". This proposal entails the



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"destruction" of three unlisted buildings and development within the setting of a number of listed buildings.

Paragraph 133 sets out that "Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss...".

Paragraph 134 continues with "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...".

Very careful consideration has been given during the pre-application discussions as to the acceptability of this proposal and the degree of harm it would be likely to cause if implemented, both to the Conservation Area and neighbouring listed buildings. As identified above, I am clear that the unlisted buildings, particularly by virtue of their scale and diversity make a contribution to the Conservation Area but this contribution has been diminished by the substantial alterations they have undergone internally behind the Strand elevation and by some erosion of detail and unsympathetic alterations externally.

The listed buildings have similarly suffered from the alterations associated with many years of institutional use, and this is particularly the case at street and upper levels externally and in terms of the substantial loss of the historic plan form and fabric of the interior.

Careful consideration has also been given to the public benefits likely to flow from these proposals, principally the maintenance and enhancement of the reputation for academic excellence which King's College enjoys by improving substantially the on site teaching facilities. Public benefits of a wider kind will also flow by greater public access to and through the site, which is in the spirit of a more general encouragement of public permeability between the Embankment and the Strand.

I feel that whilst the loss of the unlisted buildings is regrettable their demolition, allied to the physical changes they have already undergone, does not strike at the heart of the significance of the Conservation Area, why it was designated. Their loss would therefore be considered "less than substantial harm" and when weighted against the public benefits. I consider that these benefits outweigh the harm.

I consider that the works to the pair of listed buildings, already very considerably altered internally, is also "less than substantial harm" and again the public benefits outweigh this harm, as do the improved frontages at street level. The works proposed to the listed buildings are unlikely to cause harm to the setting of Somerset House.



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The scale of the building replacing the unlisted buildings relates more closely to the existing King's Strand building and in streetscape terms, by refacing the western return elevation, will heal some of the scars left by this incomplete building. The evolution of the design for this building has paid considerable attention to its impact upon the setting of the pair of listed buildings to the west. The context in which these buildings will be viewed will be changed by the design and scale of the building but again any harm that might be caused to this setting is less than substantial. I would make the same comment to the setting of Somerset House, further west. The information submitted would suggest that longer views along the Strand, rather than looking at the elevations only, particularly in respect of St Mary le Strand, would not change significantly as a result of the new development.

These considerations have been given very careful consideration in the course of pre application discussions. My interest has lain particularly with the impact of development upon the Strand and discussions concerning this area have been fruitful. I therefore consider that the public benefits arising from this scheme outweigh the loss of significance caused by the demolition of the unlisted buildings and the harm which this may cause to the Conservation Area.

Please do not hesitate to contact me if you would like to discuss this advice further.

Yours sincerely

T. D. Jones

Principal Inspector of Historic Buildings and Areas

E-mail: Timothy.Jones@english-heritage.org.uk

cc Mr Graham Oliver, Gerald Eve



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