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Planning Department
London Borough of Camden
5 Pancras Square
London
NIC 4AG

10 May 2023

Dear Sir/Madam

Re: Application for Full Planning Permission for Shopfront Changes and Application for Listed Building Consent for Shopfront Changes, the Attachment of Advertisements and Internal Alterations at Unit 2 Western Ticket Hall, Kings Cross and St Pancras International Station, Euston Road, London Camden, NIC 4QL

I am instructed by Greggs Plc to submit two separate applications relating to Unit 2 Western Ticket Hall, Kings Cross and St Pancras International Station, Euston Road, London Camden, NIC 4QL. The first application is for Full Planning Permission for shopfront changes. The second application is for Listed Building Consent for shopfront changes, the attachment of advertisements and internal alterations. Although separate applications, they are interlinked, and one cover letter has been produced for both. This is because the site description, planning history, and planning policy is relevant to both.

The application for Full Planning Permission for shopfront changes has been submitted via the Planning Portal (PP-12100234). Accordingly, please find enclosed the following attached documents in support of the application.

1. Planning application form signed and dated;
2. Site Location Plan reference: S6814;
3. Existing and proposed shopfront elevations ref: RSTH/Sxxxx/OIB.

The application for Listed Building Consent for shopfront changes, the attachment of advertisements and internal alterations has been submitted via the Planning Portal (PP-1200238). Accordingly, please find enclosed the following attached documents in support of the application.

1. Planning application form signed and dated;
2. Site Location Plan ref: S6814;

3. Euston Road – Adverts OIA – Rev B;
4. Euston Road – Listed Building OILB-RevB;
5. S6169 London, U2 Western Ticket Hall, Euston Rd-01 Existing Survey;
6. S6169 London, U2 Western Ticket Hall, Euston Rd-02 Existing Survey;
7. S6169 London, U2 Western Ticket Hall, Euston Rd-03A Proposed GA;
8. S6169 London, U2 Western Ticket Hall, Euston Rd-04A Proposed RCP Power HVAC;
9. S6169 London, U2 Western Ticket Hall, Euston Rd-05 Proposed Sections;
10. S6169 London, U2 Western Ticket Hall, Euston Rd-06A Proposed Shopfront;
11. S6169 London, U2 Western Ticket Hall, Euston Rd-07 Proposed Fire Strategy and Zone Plan;
12. S6169 London, U2 Western Ticket Hall, Euston Rd-08A Proposed Wall Details; and
13. Euston Road St. Pancras Station Graphics.

The Site

The application site is located at Unit 2 Western Ticket Hall, Euston Road. It forms part of the Grade I listed building St Pancras Station and Former Midland Grand Hotel. The site also falls within the Kings Cross Conservation Area.

The application site relates to a retail unit at ground level under the raised forecourt, comprising 4 arched shopfronts on Euston Road. The unit was formally occupied by Boots Pharmacy, which ceased trading from the site shortly after May 2021.



Photo 1: Unit as Previously Occupied by Boots (Source Google Earth Streetview)

Unfortunately, despite an extensive search using the Camden online planning application tool, there has been no success in obtaining planning history for the application site, bar the application submitted by Greggs, ref: 2022/4104/L and 2022/4102/NEW which have subsequently been withdrawn (to enable the issues raised during these applications, primarily from the Heritage adviser and from TfL/High Speed 1 relating to level of detail submitted and relationship to the wider listed building to be considered). Some changes were made during these applications and subsequently and these are detailed on the submitted plans and explained below.

However, the adjacent unit, currently in use as a Costa, provides some relevant planning history, as listed below:

- Full Planning Permission and Listed Building Consent (Ref: 2007/2218/P & 2007/2222/L) refused 30/05/2008 for the “*Installation of extract grilles to replace fanlights in 3 shopfronts on Euston Road and Pancras Road frontages and associated internal alterations.*”
- Listed Building Consent and Advertisement Consent (Ref: 2007/2226/L & 2007/2227/A) approved 19/03/2008 for the “*Installation of two non-illuminated fascia signs to 2 shopfronts on Euston Road and Pancras Road frontages and one non-illuminated hanging sign on the Euston Road frontage.*”
- Listed Building Consent (Ref: 2014/1702/L) approved 08/07/2014 for the “*Installation of replacement door handles and new concealed overhead door closers to front and side doors.*”

The Proposal

The proposal consists of two applications relating to Unit 2 Western Ticket Hall, Kings Cross and St Pancras International Station, Euston Road, London Camden, NIC 4QL.

The first application, Full Planning Permission is for shopfront changes, relates to the replacement of two small arch windows at the top of the shopfront above the fascia signage area with ventilation grills.

The second application, Listed Building Consent is for shopfront changes, the attachment of advertisements and internal alterations, and includes;

- the erection of four fascia signs, one at each archway;
- the removal of the vinyls in all arch upper windows with a drop soffit set back from the arched glazing sections, finished in grey. This is set in line with the rear of the columns except to the far right end above the fridges and freezers to allow the necessary ventilation;
- the replacement of two arch windows with ventilation grilles;
- the installation of internal advertising vinyls in far right hand shop arch and reduced vinyl, approximately 1,500mm FFL internally to screen the rear of the units but allow visibility into the back of house area to create an active frontage;
- the installation of two digital screens to the front elevation;
- internal works including site layout/fixtures and fittings, see plans for full details; and
- details of the elevation fronting onto the internal concourse to include signage and vinyls.

All fascia signage is non-illuminated, while all advertisement window vinyls and digital screens will be displayed inside the building. Therefore, this application does not require a separate advertisement consent application, as the advertisements are all permitted under deemed consent.

'Deemed consent' refers to the automatic consent permitted for types of advertisements listed in Schedule 3 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. There are 17 classes of advertisement in Schedule 3, each of which has its own criteria and conditions that must be satisfied. Class 12 refers to an advertisement displayed inside a building, while Class 5 allows for non-illuminated signage on the front of the shop unit.

Full details of the proposed signage, shopfront alterations and internal alterations are detailed on the application form and submitted plans.

Planning Policy

National Planning Policy Framework

The revised National Planning Policy Framework (NPPF) was updated in July 2021. The NPPF contains a presumption in favour of sustainable development sympathetic to the conservation of designated heritage. The government's definition of sustainable development is one that incorporates all the relevant policies of the Framework, including the protection and enhancement of the historic environment.

Relevant NPPF Policies are found in Section 16 "Conserving and Enhancing the Historic Environment".

Paragraph 189 states that heritage assets "*an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations*".

The London Plan 2021

The new London Plan which sets out the Mayor's overarching strategic planning framework for the next 20 to 25 years was adopted in March 2021 and supersedes the previous Plan.

Policy HCl deals with heritage conservation and growth. The Policy states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

Camden Local Plan

Policy D1 (Design) indicates that the Council seeks to secure high quality design in development, providing a list of requirements for developments, including the need to respect local context and character, preserve and enhance the historic environment and heritage assets, comprise details and materials that are of high quality and complement local character, and integrate well into the surrounding streets and open spaces.

Policy D2 (Heritage) clearly suggests that the Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. For proposals relating to conservation areas, this means the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. For proposals relating to listed buildings, this means the Council will control external and internal works that affect their special architectural or historic interest.

Policy D3 (Shopfronts) suggests that the council expects a high standard of design in new and altered shopfronts. It stipulates that when determining proposals for shopfront development the Council will consider the existing character, architectural and historic merit and design of the building and its shopfront. Importantly, the Policy also states that where an original shopfront of architectural or historic value survives, in whole or in substantial part, there will be a presumption in favour of its retention.

Policy D4 (Advertisements) is clear in its requirement for advertisements to preserve or enhance the character of their setting and host building.

Planning Discussion

The proposals have been based on a detailed understanding of the heritage significance of the subject site including comments from TfL and High Speed 1. Full account has been taken of the architectural and historic interest of the listed building and the proposals have avoided any harmful interventions to historic plan form and fabric of significance.

This application has been submitted with significantly more detail in terms of the site's internal layout and equipment to be installed within the building in line with the comments received in respect of the previous application directly from TfL/High Speed 1 and discussions with the case officer for the previous LBC application.

A number of changes have also been made to the scheme which seek to address comments previously made. In line with the requirements from TfL/High Speed 1 the signage has been adapted to comply with the approved signage parameters for St Pancras as set out in the HSI Guide – Retail Works. Whilst outside of the control of advertisements but relevant to the Listed Building character of the site, with respect to the digital screens it should be noted that these form part of the Greggs' estate of shops for at least 10 years and are integral to the shop design. The technology allows Greggs to be agile with their menus, promotions, product and price changes which would otherwise need to be produced in card or paper format, incurring delays and a significant impact on waste and the environment. The screens display Greggs' hot drinks and breakfast menus, along with product deals, new products and charity/local messaging. The messages do rotate on some of the screens, but this is very infrequent and can be changed and localised to a particular shop. Greggs' decision to move to a digital screen reflects the need to alleviate the reliance on card and paper and reduce a large amount of waste in the business and further enhance their commitment to the

environmental impact. Accordingly, Greggs digital screens play an important role in providing information to customers in an environmental manner.

In response to previous comments from Camden Council, the vinyls from the glazing lights above the transom/fascia panel have been removed. No services will be visible through these glazed lights and a drop soffit is proposed on the backline of the internal shopfront column which will be finished in grey. The ductwork behind the new ventilation grilles will be boxed in behind the grilles, also finished in grey. All that will be seen through the glazed lights is a grey board set back from the shopfront.

In respect to the proposed ventilation grilles these will be finished in grey RAL7011 to co-ordinate with other such grilles within the station. The grilles are a necessary part of the occupation of the unit by Greggs and have been positioned so as to create a balanced frontage symmetrical to the Greggs unit, whilst also being considerate to future maintenance and access to the services behind.

As standard Greggs will fit their ventilation system with odour filtration and as a minimum carbon filtration will be fitted with a maintenance cleaning schedule for all duct work. The grilles will be utilised to exhaust excess heat from the refrigeration to maintain their performance, and ovens as well as general ventilation required under Building Regulations.

Greggs propose a low level wall in the middle, left hand side, arch to provide screening to till activity for safety and security reasons. On the arch to the right hand side, including the door, a vinyl is provided along the window to provide screening to the rear of the preparation areas, but is left open above to provide views within the prep area creating an active frontage. Both these measures are effectively temporary and could be removed on Greggs' departure from the premises but provide a practical solution to ensure the site can be occupied with its associated benefits, whilst providing the necessary safety and security screening required by the occupier.

The TfL/High Speed 1 previously commented on the ironmongery within the premises and Greggs propose to retain all of the ironmongery and if, for any reason, any damaged ironmongery is found Greggs will reinstate like for like.

Based on the above, the proposals will involve minimal loss of historic fabric and consequently are considered to have a minimal and neutral impact on the setting of the listed building. The proposals will be visually discreet and not compromise the historic interest of the listed building. There will therefore be no harm caused to the heritage asset.

The proposals are considered to sustain the special historic and architectural interest of the statutorily listed building by preserving those elements of significance that have been identified as contributing to that special interest. It is therefore concluded that the proposed works satisfy the relevant clauses of the NPPF. These are consistent with the spirit of local, regional and national planning policies and conservation principles.

The significance of the listed building and wider conservation area will therefore be sustained, whilst offering enhancement to the historic character of the area through the conversion of a vacant unit with an inactive shopfront, into a carefully designed shopfront which contributes positively to the local character. The proposals preserve the significance of the subject site and comply with Policy HCl of the London Plan and D1, D2, D3 and D4 of the Camden Local Plan.

Heritage Statement

Significantly, the unit forms part of the Grade I listed building St Pancras Station and Former Midland Grand Hotel (See official listing: ST PANCRAS STATION AND FORMER MIDLAND GRAND HOTEL, Non Civil Parish - 1342037 | Historic England). The arches within which the unit is situated are mentioned in the official listing, which acknowledges "towards the Euston Road end there is a set-back which also has blind pointed arcade; this section runs for roughly 11 bays of the arched ground-floor structure."

Special consideration has been given to the design of the new shopfront to remain in keeping with the historic elements of the area and the station. The proposal will retain the existing shopfront frames and doors and will ensure that shopfront colour will remain the same, and that where any redecoration is required it will be done in accordance with listed building guidance to match the existing finishes exactly. Where arch windows are to be replaced by ventilation grills, these are to be finished to match vents elsewhere on the building. The internals of the premises lack historic content having already been stripped to a shell level with modern additions albeit due consideration has also been given to these elements. Thus, the proposals will be visually discreet and almost imperceptible from the public realm. The amenity issues are generally covered more fully in the Planning Discussion above.

Conclusions

As detailed above careful consideration has been given to the site's listing and inclusion in a conservation area in the design of the advertisements and shop front alterations, largely reflecting that previously in situ when the site was last occupied but also responding to comments received to date.

The proposal also seeks to bring this currently vacant unit back into active use, providing vitality to the area and contributing to the local economy through the provision of jobs and spending, which is also an important material consideration is the determination of the application. The proposals are considered to accord with the development plan, so it is respectfully requested planning permission is forthcoming.

Should you have any queries regarding the attached or enclosed, please do not hesitate to contact Jackie Ford at Jackie@jmsplanning.com or on 07770 328674.

Kind regards

Yours faithfully

A handwritten signature in black ink, appearing to read 'J Ford', enclosed within a large, loopy circular flourish.

Jackie Ford
JMS Planning & Development

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