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

16 April 2024

Dear Sir/Madam

Re: 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 an application for Listed Building Consent for shopfront changes, the attachment of advertisements and internal alterations at to Unit 2 Western Ticket Hall, Kings Cross and St Pancras International Station, Euston Road, London Camden, NIC 4QL.

This is a revised application relating to Listed Building Consent Ref: 2023/1866/L. While the alterations in the revised application are deemed minor in nature, they necessitate a fresh Listed Building Consent application. All modifications are outlined below and can be observed on the revised plans that have been submitted. The modifications have been necessitated because of issues regarding the placement of condensers, which TfL have indicated must be situated internally within the store.

The application for Listed Building Consent for shopfront changes, the attachment of advertisements and internal alterations has been submitted via the Planning Portal (PP-12983703). 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 O1A – Rev E;
4. Euston Road – Listed Building O1LB – RevE;
5. S6169 London, U2 Western Ticket Hall, Euston Rd-01 Existing Survey ref: S6814/01;
6. S6169 London, U2 Western Ticket Hall, Euston Rd-02 Existing Survey ref: S6814/02;
7. S6169 London, U2 Western Ticket Hall, Euston Rd-03 Proposed GA ref: S6169/03 – Rev C;

8. S6169 London, U2 Western Ticket Hall, Euston Rd-04 Proposed RCP Power HVAC ref: S6169/04 – Rev E;
9. S6169 London, U2 Western Ticket Hall, Euston Rd-05 Proposed Sections ref: S6169/05 – Rev C;
10. S6169 London, U2 Western Ticket Hall, Euston Rd-06 Proposed Shopfront ref: S6169/06 – Rev E;
11. S6169 London, U2 Western Ticket Hall, Euston Rd-07 Proposed Fire Strategy and Zone Plan ref: S6169/07 – Rev F; *and*
12. S6169 London, U2 Western Ticket Hall, Euston Rd-08 Proposed Wall Details ref: S6169/08 – Rev B;
13. Cooling & Ventilation Ceiling Void Layout, ref: 1000_PO6;
14. Cooling & Ventilation Ceiling Void Layout, ref: 1001_PO6;
15. Mechanical Sections, ref: 1002_PO5; *and*
16. Graphics Document, prepared by Natalie Dunn, dated 26/03/2024

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)

The application site has recently received both full planning permission for shopfront alterations (Ref: 2023/1865/P, granted 11 January 2024) and listed building consent (Ref: 2023/1866/L, granted 11 January 2024) for the removal of windows and installation of vent grills within openings, also with internal works associated to new operation.

The Proposal

The proposal relates to Unit 2 Western Ticket Hall, Kings Cross and St Pancras International Station, Euston Road, London Camden, NIC 4QL, and seeks to supersede to extant Listed Building Consent mentioned above (2023/1866/L).

The alterations from the extant Listed Building Consent include;

- The creation of an internal room within the customer area to house internal condensers;
- Self-selector unit moving further towards the back-of-house area;
- Updated ventilation design;
- Equipment changes;
- New pumps added;
- The grey finish to the side of the back bar raised slightly to the oak backfitting (for food hygiene reasons) but the front remains to the height the officer specified previously.

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. This was agreed upon as part of the previous application.

'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 alternations 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 December 2023. 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 195 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 principle of this application has already been accepted by way of the Listed Building Consent (LPA Ref: 2023/1866/L) granted 11 January 2024. This updated

proposal presents only minor adjustments to the approved scheme and does not significantly alter the application.

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. The proposed application only seeks minor amendments to the approved listed building consent, and as such it is considered that the decision to grant consent should remain.

This application has been submitted with extensive detail regarding 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.

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. This application is necessary to address the very minor changes to the internal layout previously approved under application Ref: 2023/1866/L, albeit the principles of the works are unchanged.

The proposal 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, respects the listed nature of the building, and the principle of the works have previously been approved 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 faint rectangular border.

Jackie Ford
JMS Planning & Development

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