

Planning Department
Camden Council
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PMV
Planning

124 City Road
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3 April 2025

Dear Planning Department

**APPLICATION FOR FULL PLANNING PERMISSION AND LISTED BUILDING
CONSENT – MINOR EXTERNAL ALTERATIONS AT GREAT NORTHERN
HOTEL, PANCRAS ROAD, LONDON N1C 4TB**

On behalf of the Kaya Hotels UK ('the Applicant'), we are pleased to submit an application for full planning permission and Listed Building Consent for external alterations including replacement doors, replacement hatch, placement of trellis, hanging sign and heaters, and minor internal alterations at Great Northern Hotel ('GNH' or 'the Site').

The following supporting documentation is provided in addition to this cover letter:

- Site Location Plan;
- Existing and proposed floor plans;
- Existing and proposed elevations;
- Design document, prepared by Studio KKD; and
- Heritage Note, prepared by Portico Heritage.

Further information and details about the proposed works are contained within the above suite of documents, however for reference, the proposed alterations comprise:

- Replacement of 3x windows with like-for-like doors at the south-eastern elevation;
- Replacement of 1x door with a hatch and fixed board at the northern elevation;
- Placement of hanging sign above hatch opening at the northern elevation;
- Placement of trellis and heaters at northern elevation; and
- aAmendments to first floor meeting room to facilitate the relocation of the hotel reception.

Site Context

The Site is located within the Kings Cross Ward and comprises a five-storey mid-

Victorian building, constructed in the mid-1850's. It is sited at the southern end of Pancras Road, close to its junction with Euston Road and is unique in its curved design which wraps around the south westerly section of the adjoining Kings Cross train station concourse. Directly opposite the Site, across Pancras Road to the west, is St Pancras International train station.

Pedestrian access to the hotel is taken at the building's entrance opposite Pancras Road, which currently leads to a reception area. A separate access to the hotel's bar area is located approximately slightly further round the building to the north, and adjacent to this entrance is an outdoor seating area, currently providing space for 45 covers.

Planning designations

The building is Grade II Listed and, according to Historic England's Official Listing Entry, its features of note comprise its yellow stock brick with stucco dressings; crescent shape which reflects the original alignment of Pancras Place (now Pancras Road); concave main façade towards King's Cross Station; and tripartite windows and stucco dressings. The entrance is also noteworthy in its detailing which includes a cast-iron and wood portico, and round arched glazing.

The interior has not been inspected as part of Historic England's assessment however it is noted that the hotel was one of the first to include rooms on the "continental system" with en-suite bedrooms and sitting rooms, whilst the original owner prided itself on the fireproof construction of the hotel with thick walls dividing every room and corridors constructed of brick arches, supported by iron girders.

The Site is within the Central Activities Zone and Kings Cross Opportunity Area as designated within the London Plan, as well as the Kings Cross Conservation Area.

Planning history

The Great Northern Hotel forms part of the wider King's Cross Central regeneration area which was granted outline planning permission on 22 December 2006 (LPA ref. 2004/2037/P). Detailed planning and listed building consent for the comprehensive refurbishment of the hotel, together with the additional arcade proposals to complement the new Western Concourse to King's Cross Station) was granted through a series of applications between 2007 and 2011, with the refurbishment work undertaken between 2009 and 2011 and the hotel opening in 2013.

The building, which had been vacant since 2001, underwent significant alteration at basement and ground floor level as a result of the outline application referenced above. Works included the removal of the remaining railings and infilling of the lightwells, as well as removal of a significant portion of the ground floor of the building to create a pedestrian arcade to accommodate the forecast increase in pedestrian movement between King's Cross and St Pancras, along Euston Road and King's

Cross Centre (LPA ref. 2006/3220/P and 2006/3222/L). These works were completed in November 2009.

The ground floor windows are not original fabric, with timber framed windows inserted as part of the renovations works in 2010 (LPA ref. 2010/3304/P). Planning permission was recently granted for works similar to those proposed as part of this submission, including external alterations to replace an existing window at ground floor (LPA ref. 2023/4817/P).

Several temporary pavement license consents have been granted within the last ten years for the placement of tables, chairs, planters and heaters to accommodate outdoor service to restaurant clientele and hotel guests at the hotel's principal elevation.

Most recently, pre-application feedback was sought in relation to the proposed development (ref. 2024/5426/PRE). Comments made by the Council in response to the pre-application scheme are discussed within the Planning Assessment section of this letter.

Proposed Works

Relocation of hotel reception

The existing arrangement and placement of the reception is not optimal for the operation of the hotel, and it is therefore proposed to relocate it to the first floor. This would require some works to the wall of the meeting room to accommodate a reception desk, given that the corridor would not be wide enough for this alongside customers of the restaurant and guests of the hotel to walk through as existing.

Images 1 and 2 below show extracts from the existing and proposed plans to illustrate the minor changes.

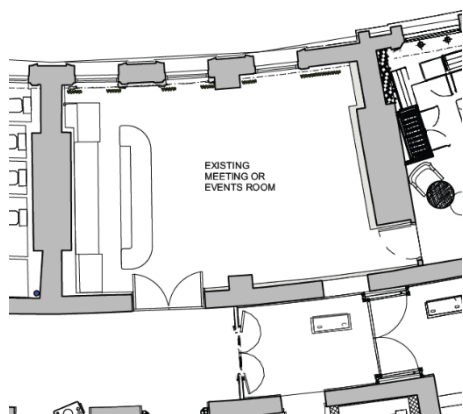


Image 1: extract from existing first floor plan (ref: 2474.PL.003)

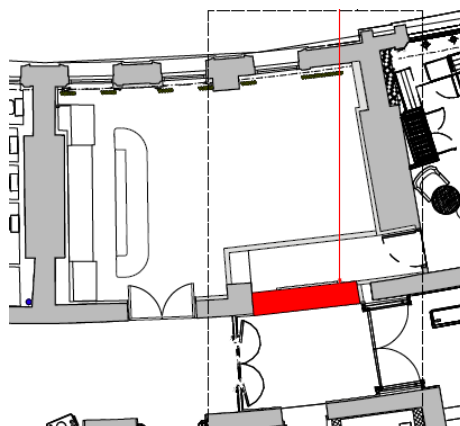


Image 2: extract from proposed first floor plan (ref: 2474.PL.013)

Replacement hatch (north elevation) and doors (south-east elevation)

In order to make optimal use of the soon to be vacant reception area, this application proposes the replacement of the three fixed windows at the south-east elevation with doors to enable ancillary food and beverage operations and provide an enhanced hotel / railway station offering.

The doors will match the detailing of the existing windows, and further details on the location and detailing can be found within the proposed elevations submitted with this application (drawing refs: 2406_DT_001 Rev C, 2406_DT_003 and 2406_DT_004). No internal alterations are proposed in this area. This expands on the existing consent as referenced above (2023/4817/P) for the change of an existing window with an entrance door at ground level, the erection of lighting and other associated works.

In addition, amendments are proposed within the current bar to enable GNH food and drinks to be served to passing customers within the arcade, which runs immediately adjacent to the hotel. There are currently two double doors, one of which would be replaced with a hatch and lower panel to enable the hotel to serve patrons with food and beverage from the internal bar. Trellis and heaters are also proposed on the wall which will further enhance the elevation and provide a more interesting and active frontage. A hanging sign is proposed and an application for advert consent will be submitted to the Council for consideration.

Furthermore and to enhance the offering, the Applicant is proposing to place tables and chairs adjacent to the north and south-east elevations. Although Listed Building Consent is not required, these are shown indicatively on the accompanying plans for completeness and a separate pavement license will be sought.

Relevant Planning Policy

Local Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for development to be determined in accordance with the Development Plan, unless other material considerations indicate otherwise.

For the purposes of this application, the relevant Development Plan document for Camden Council ('the Council') comprises Camden Local Plan, adopted in 2017, and the London Plan, adopted in 2021.

Policies within the Development that are relevant to the assessment of the proposed development are as follows:

Camden Local Plan ('CLP')

- G1 Delivery and location of growth
- C5 Safety and security
- C6 Access for all
- E1 Economic development
- E3 Tourism
- A1 Managing the impact of development
- D1 Design
- D2 Heritage

London Plan ('LP')

- GG5 Growing a good economy
- SD1 Opportunity Areas
- SD4 The Central Activities Zone (CAZ)
- D1 London's form, character and capacity for growth
- D3 Optimising site capacity through the design-led approach
- D8 Public realm
- D12 Fire safety
- E10 Visitor infrastructure
- HC1 Heritage conservation and growth

It should also be noted that the Council undertook Regulation 18 consultation on its draft new Local Plan between 17 January and 13 March 2024. It is yet to publish a Regulation 19 submission version and this document therefore holds little weight in its current form when assessing the proposed development.

National Policy

The National Planning Policy Framework (NPPF) was first published in 2012 and last updated in December 2024. It sets out the Government's planning policies for England and how these are expected to be applied through local plans and decision making. The NPPF is to be read as a whole and is underpinned by the aim of achieving development that is economically, socially and environmentally sustainable.

Both the NPPF and related guidance in the Planning Practice Guidance (PPG) are important material consideration in the determination of planning applications. The following paragraphs are particularly relevant to the proposed development at the Site:

- Paragraph 11 explains the presumption in favour of sustainable development.
- Paragraph 85 supports the investment, expansion and adaptation of businesses, with significant weight placed on the need to support economic

growth, taking into account business needs and wider development opportunities.

- Paragraph 96a) promotes the provision of healthy, safe and inclusive places for social interaction, through street layouts that allow for easy pedestrian connections.
- Paragraph 98a) promotes positive planning for the provision and use of shared spaces and community facilities, whilst 98d) supports the development and modernisation of facilities and services.
- Paragraph 124 encourages an effective use of land.
- Paragraph 131 places emphasis on the creation of high-quality, beautiful and sustainable buildings.
- Paragraph 135c) promotes development that is sympathetic to the local character and history, including the surrounding built environment.
- Paragraph 207 requires applications for development to describe the significance of any affected heritage assets, including any contribution made by their setting.
- Paragraph 212 explains that great weight should be given to a heritage asset's conservation when considering the impact of a proposed development on its significance.
- Paragraph 215 states that less than substantial harm caused to a heritage asset by a proposal should be weighed against the public benefit.

Planning Assessment

Principle of development

As discussed at pages 2 and 3 of this letter, the Site has been subject to numerous planning permissions and pavement licenses, including the 2023 permission for a very similar proposal to replace the doors with windows at the south-east elevation. This scheme expands on this permission to include replacement of doors at the northern elevation and minor internal amendments.

Importantly, the site is located within the King's Cross Opportunity Area and London's CAZ. Policies relating to these areas encourage boroughs to support development that creates employment opportunities, with Policy SD04 particularly noting that unique tourism functions of the CAZ should be promoted and enhanced, as well as its attractiveness to residents, visitors and businesses including through improvements to the public realm. In this regard, the proposed amendments would create employment opportunities and provide an enhancement to the F&B offering that is currently available to residents and tourists within the vicinity of Kings Cross.

The space to the south-east of the site is currently underutilised and presents an ill-defined relationship with both the hotel building and the King's Cross railway station concourse. Adding a high-quality seating area where the proposed F&B hatches are to be located will provide customers with a meeting place in an otherwise vacant

area and will create an active frontage at these elevations, improving the public realm as encouraged through LP Policy D8.

The Council confirmed its support of the installation of two additional F&B hatches through formal pre-application feedback, citing the enhancement that would be made to the railway station offering.

Design

National policy places emphasis on requiring development to be high-quality, beautiful, sustainable and sympathetic to the local area's character and history. This is reflected in local policy through Policy D1 which specifies that details and materials should be of high quality and complementary to the local character.

In this regard, the three existing fixed windows at the south-eastern elevation, and one of the two at the northern elevation, are to be replaced by like-for-like doors and panels in the same colour and material, thus reflecting existing local character and features, with very minor changes to the external appearance. Further details can be found within the proposed drawings submitted as part of this application.

The design is therefore acceptable when taking into account local and national policy.

Heritage Impact

Paragraph 207 of the NPPF requires applications for development to describe the significance of any affected heritage assets, including any contribution made by their setting. Paragraph 210 further advises that when determining applications involving a heritage asset, local authorities should take account of the desirability of sustaining and enhancing the significance of such assets, ensuring their use is consistent with their conservation; the positive contribution that conservation can make to sustainable communities; and the desirability of new development making a positive contribution to local character and distinctiveness.

The proposal to relocate the hotel reception only affect the interior of the building and, in this regard, there are no features of significance according to Historic England's listing entry given that the interior has not undergone inspection, aside from the 'continental' style provision of en-suite bathrooms and sitting rooms.

A heritage note, prepared by Portico Heritage, has been submitted to support this application. It describes the building's heritage significance including features of merit, and the impact of the proposals on its setting and significance.

With regard to the relocation of the hotel reception, the note points to the reconfiguration and refurbishment at the beginning of the 21st Century which re-orientated the hotel operation up to the first floor. The proposal is therefore in keeping

with the current operation and would enhance guest experience.

As set out in the Council's pre-application feedback, the replacement doors are not considered to have any further impact on the architectural significance of the building, especially when taking into account the numerous changes that have already taken place at ground floor.

The amendments to the doors at the north and south-east elevations to facilitate the provision of additional customer interface would have little physical impact to the building, and would enhance its setting through creating a more active frontage where there are currently "blank" elevations.

Overall, the proposals do not affect the significance or setting of the building and thus cause no harm. Furthermore, the character of both the Listed building and Conservation Area within which it sits would be preserved and, as such, Listed Building Consent should be granted.

Whilst the proposed placement of tables and chairs at the perimeter of the building is not "development" and as such, does not require planning permission, it is relevant to consider this element in the assessment of potential harm caused to both the building's and the Conservation Area's setting and significance. In this regard, the elevations in which the furniture is to be placed are not considered to hold any architectural significance. Furthermore, the Council's Conservation Area Statement for Kings Cross, adopted in 2004, describes GNH as "*an important component*" within the Kings Cross and St Pancras stations, with a "*strong but not overbearing presence*". This presence will be enhanced with the addition of furniture to supplement the additional F&B offering, attracting visitors and local residents to the vicinity.

Street furniture is also present at several locations within the Conservation Area and sub-area of Kings Cross/St Pancras, including the German Gymnasium and within Kings Cross station itself. This element of the proposed scheme would therefore be in context with the immediate surrounding area and cause no harm to the setting or significance of the heritage assets.

However, if the Council does decide that some level harm is caused by any element within the proposal, this is considered to be less than substantial. Paragraph 215 of the NPPF states that less than substantial harm caused to a heritage asset by a proposal should be weighed against the public benefit. The public benefit to the placement of tables and chairs would be seen in the ability of customers to interact with other members of the community and enhancing the currently vacant and underutilised public realm. The public benefits therefore outweigh any harm caused by the proposal and it is therefore in accordance with national policy.

Summary

The proposed scheme to slightly alter a meeting room and amendments to the doors at the northern and south-eastern elevations of the building to enable ancillary food and beverage services to GNH and Kings Cross customers would provide employment opportunities and additional F&B offerings to tourists and residents within the local area, without impacting on or causing harm to the Listed building.

Furthermore, the placement of tables and chairs in two underutilised areas at the north and south-east elevations would enhance the public realm, giving customers the opportunity to interact and consume their purchases.

The proposals within this application are compliant with relevant local and national planning policy, and as such, planning permission and Listed Building Consent should be granted.

Please do not hesitate to contact me if you wish to discuss the proposals or require any additional information.

Yours faithfully



Sophie Rae
PMV Planning