



Historic England

Mr Christopher Smith  
London Borough of Camden  
Development Management  
Town Hall, Judd Street  
London  
WC1H 9JE

Direct Dial: 020 7973 3093

Our ref: P01588072

21 February 2025

Dear Mr Smith

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**BRITANNIA STREET CAR PARK LONDON WC1X 9BP  
Application No. 2025/0407/P**

Thank you for your letter of 3 February 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

Heritage significance of the site

The site is in the King's Cross St Pancras Conservation Area, which is a large and varied area of townscape which has seen a great deal of recent change. As identified in the 2004 Conservation Area Statement, it is within sub-area 4, Gray's Inn Road. This falls between the latter and King's Cross Road, and according to the Statement, contains "narrow streets paved in granite setts, predominantly lined with later 19th century buildings of former light-industrial and commercial uses," as well as residential on Wicklow Street, and which "have a characteristic fine urban grain with broad consistency of building heights and materials".

While an emerging context of slightly larger development is beginning to encroach, in the immediate setting of the site, the character described remains. It is of a balance of subtle variations in the appearance of buildings, in which brick and stucco prevail, with a limited range of façade treatments and fenestration mainly in timber, sometimes in metal. The listed buildings closest to the site capture this range: the brick and stone Gothic former church schools at 75 Wicklow Street (Grade II) and the two Derby Lodges, Improved Industrial Dwellings Company flat blocks in cream brick and stucco with prominent decorative ironwork (Grade II). Britannia Street itself has a slightly greater variety of ages and forms.



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## The proposals and their impact

The proposal is for construction of purpose-built student accommodation with community floorspace at ground level, rising to seven storeys. The architectural concept proposes a three-part building comprising: a metal-clad plinth including projecting elements identifying the entrance to the community space, carrying amenity above, and mediating scales at the street edge; a grey-brick element adjoining the existing street frontages and emulating the fenestration and proportions of surrounding brick buildings; and an element with strong horizontal emphasis, mainly cantilevered over the railway cutting, with an expressed frame incorporating folded metal panels.

The submitted visual materials suggest that the proposed development would introduce a notably larger scale on its host streets, but given the emerging context and historic light-industrial character, that this would not be harmfully disruptive or intrusive to the conservation area. While the proposed division of the building by the three starkly different façade treatments would help to manage the overall sense of bulk this increased scale could create, on the other hand the starkly contrasting material colours and tones would seem to work against integration of the building in its context. Introducing too great a degree of contrast, both in its own composition and as viewed obliquely alongside neighbours, into this subtle part of the conservation area would be a harmful change to character and appearance. It may detract from appreciation of listed buildings which benefit from this complementary setting.

## Relevant planning policy context

Statutory duties require planning authorities to consider the impact of development proposals upon heritage assets, having special regard to the desirability of preserving or enhancing the setting of listed buildings and the character or appearance of conservation areas.

The National Planning Policy Framework (NPPF, 2024) requires that conservation of designated heritage assets' significance should be accorded great weight in the planning balance (paragraph 212) and that any harm to them should have clear and convincing justification (213). Less-than-substantial harm to designated heritage assets should be weighed against the public benefits of the proposals (215).

Regarding good design, paragraph 140 of the NPPF states that local planning authorities should seek to ensure that the quality of approved development is not materially diminished between permission and completion. The National Design Guide sets out the criteria for good design, including Context, Identity and Built Form. The characteristic of context in a well-designed place entails, among other criteria, developments that are "integrated into their surroundings so they relate well to them".



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### Historic England's position on the proposals

While the proposed development has evidently been the product of a careful and rigorous process of design and consultation, including with the community and drawing on a close analysis of the context, the bold approach it takes needs to find the relationship to its context in order to avoid harm to the conservation area.

The powerful contrast between the three pieces of the building would, as proposed, seem to produce a building considerably louder and more complex than its neighbours, increasing, rather than managing, the proposed development's sense of continuity with its historic context. Similarly, the selection of a grey brick and dark coloured metal cladding for the largest part of the facades, neither of which is found in the immediate context, would set-up a contrast of colour and tone with close neighbours which would hinder rather than support the integration of the proposed development's larger scale into the generally lower and fine-grained surroundings.

We encourage careful attention to the contextual consequences of these design choices, most particularly the character and appearance of the King's Cross St Pancras Conservation Area and the settings of nearby listed buildings within it. A reconsideration of colour, tone and materials with reference to the immediate conservation area context could reduce the harmful impact we identify. You should also ensure the greatest care is taken in the final specification of facing materials, and the quality of the finished development, should the application be approved, in order to safeguard this sensitive part of the conservation area.

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of NPPF paragraphs 208 to 215.

In determining this application you should bear in mind the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Yours sincerely

**Alfie Stroud**

Inspector of Historic Buildings and Areas

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