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Guardian Space, Midlands Good Shed and Handyside Canopies

ADDENDUM TO LISTED BUILDING CONSENT APPLICATION SUPPORTING STATEMENT

August 2015

Introduction

1. This document is an addendum to the 2014 documents listed below, with which should be read in conjunction. It will focus on the new alterations and proposals which are the subject of applications for listed building consent and minor amendments to the approval of reserved matters granted on 16 June 2014 (ref: 2014/1433/P), and includes an Impact Assessment and Justification Statement. The proposals are for the fit-out of the Guardian Space in the East Handyside Canopy and Midland Goods Shed (level 1) at King's Cross.
2. For full details of the proposals please refer to the submitted application plans and drawings by Bennetts Associates Architects (August 2015).
3. The alterations proposed are generally minor/moderate and the principal uses and configuration remain as per the extant consents.

Background

4. Heritage Architecture Ltd. was first appointed in 2012 to provide supporting documentation in respect to the submission of the planning and listed building consent applications for the refurbishment and alterations of the Midlands Good Shed, East Handyside Canopy and West Handyside Canopy to be used for retail, educational and office uses. A full assessment of their heritage significance alongside the impact of the proposals on the building fabric and on the heritage assets within the zone of visual influence was carried out, and the following documents were produced:
 1. Full Conservation Plan, February 2014
 2. Listed Building Supporting Statement, February 2014

Approval of reserved matters and listed building consent were granted on 16th June 2014 (2014/1433/P and 2014/1436/L)

Context

5. The Midland Goods Shed (MGS) was a carriage shed built in 1850 for the adjacent temporary Great Northern Railway (GNR) terminus at Maiden Lane. Once King's Cross station was completed, it became a goods shed and a three story annex was added at its southern end. The East Handyside Canopy (EHC) was constructed in 1888 to allow traders from the potato market to unload wagons under cover.

6. Although both structures are unlisted, they belong within the curtilage of the listed Grade II the Granary, and constitute the setting of other heritage assets in the area. A full assessment of their heritage significance has been done as part of the Listed Building Consent application alongside the impact of the proposals on the building fabric and on the heritage assets within the zone of visual influence.
7. The site is within the Regent's Canal Conservation Area.

Present Proposal and Pre-application Advice

8. In essence, the proposed works comprise minor reconfiguration of circulation and some spaces within the MGS and EHC including stairs, layout of toilets, storage rooms and seminar rooms. Also proposed is: additional toilets and stairs, revision of the feature stairs, a new kitchen, new display units in the EHC and new 'pods' and louvre windows in the MGS. External changes include roof level duct / ventilation cowls, six additional condenser units and screening on the upper level terrace, and replacement of four clerestory windows with louvres.
9. The revised proposed scheme takes into account the feedback received from SLHA, Alan Wito from the London Borough of Camden and Historic England.

Impact Assessment Introduction

10. SLHA were appointed in 2015 to provide conservation advice and guidance to the team so the continuity from the originally consented scheme in June 2014 could be maintained and the special architectural and historic interest of the structures protected. This Addendum is in support of the amended applications.
11. The following paragraphs discuss the effects of each of the proposed variations from the consented scheme 2014/1433/P and 2014/1436/L and their acceptability in historic buildings terms. It is not intended to restate here the case for the entirety of the works as this has previously been demonstrated in the successful applications for outline planning permission, approval of reserved matters and listed building consent.

Impact Assessment Criteria

12. The impact assessment on the special interest of the heritage assets takes into account whether the proposals cause substantial or less than substantial harm by altering or eroding the authenticity and of the heritage values identified in the significance assessment – notable features in the Listed Building Supporting Statement, February 2014 (aesthetic, historic, communal and evidential).
13. For the purposes of assessing the likely impact to result from the proposed development on the fabric of the MGS and EHC and its subsequent impact on the setting, established criteria have been established. The impact of proposals can be grouped into three categories: **neutral, beneficial or adverse**.
14. Within the three categories there are four different levels that can be given to identify the intensity of impact:
 - **"negligible"** – impacts considered to cause no material change.
 - **"minimal"** - impacts considered to make a small difference to one's ability to understand and appreciate the heritage value of an asset. A minor impact may also be defined as

involving receptors of low sensitivity exposed to intrusion, obstruction or change of low to medium magnitudes for short periods of time.

- **“moderate”** - impacts considered to make an appreciable difference to the ability to understand or appreciate the heritage value of an asset.
- **“substantial”** - impacts considered to cause a fundamental change in the appreciation of the resource.

Impact Assessment

15. A detailed impact assessment has been carried out, element-by-element, for each item of the works proposed. The results have been tabulated below to clearly show where alterations are proposed in significant areas and how the impact and mitigation assessment has been envisaged.
16. Each proposed work is cross-referenced with “N + M” references¹ on submitted proposed drawings by Bennetts Associates Architects (August 2015).

Drawing Ref. no.	Description of the proposal	Impact	Notes/mitigation
1314_P_101 Rev C			
N6	Additional stair from EHC reception to mezzanine for improved circulation. Integral stair, bar & reception desk with moveable components & wall for Projection.	Neutral/ Moderate	The spatial expression will be altered, however, the volume of the space can still be read and appreciated and there is no impact on the historic fabric.
N7	Additional flexible reception/ coffee bar in entrance area and projection wall	Neutral/ Minimal	The additional use optimises the space and encourages public use. The amendment does not impact the historic fabric.

¹ Please note the “M+N” references are drawing-specific

N5	Built-in joinery to provide display surfaces, integrated services, accommodate acoustic panels and hold 'pop up' furniture	Neutral/ Moderate	This will not have a visual impact on the exterior of the building as the joinery will be installed on the inside face of the previously consented panels; there will be visual impact on the interior of the EHC. However, the previously consented panels fit between the trusses and the structural rhythm will therefore still legible. Moreover the openness and feeling of the volume will still be perceived. There is no impact on historic fabric as the panels are cantilevered from the ground. The work is reversible.
M2	Feature stair with seating revised. Going and riser amended	Neutral/ Minimal	The volume of the EHC will still be appreciated, seating area is increased thus encouraging public use. Impact on the historic fabric will be minimal.
N3	SER room (Secondary Equipment Room – space for AV + IT equipment) with access from Winter Garden	Neutral/ Minimal	There is an increase in enclosed areas on the ground floor.
N4	'Winter Garden' to animate the southern end of the demise.	Neutral/ Negligible	No impact on the historic fabric.
N1	Transparent glazing wall along kitchen to animate façade and segregate kitchen. Partition is partially glazed to allow visual continuity between spaces.	Neutral/ Negligible	The original volume of the structure is still perceivable. Impact on historic fabric and visually is therefore low.
N2	Large event space to become kitchen with storage - On site preparation - Carbon filter canopy (= not extracted to the outside) - Dumb waiter from GF to Mezzanine Level	Neutral/ Minimal	This proposed reconfiguration will affect the layout, however, the significant features of the EHC, namely its volume and structure, can still be perceived.

M1	<p>BoH areas including:</p> <ul style="list-style-type: none"> - Toilets: Number and Type of toilets revised. - Super-loos replaced with separate Male and Female. - Number of showers reduced - Servicing corridor introduced between BoH entry & delivery zone and proposed kitchen - Staff WC - Cleaners Store and Storage 	Neutral/ Negligible	This alteration is minimal and does not affect the historic fabric or its significance.
M3	<p>Lift Lobby</p> <p>The Lift Lobby has been revised to accommodate an enclosed entrance lobby and retain open to the Accumulator Tower / Lift Lobby</p>	Neutral/ Negligible	The main event lobby is reduced in size as a result of this alteration. This has negligible impact in heritage terms.
1314_P_102 Rev C			
N3	<p>Additional stair from EHC reception to mezzanine for improved circulation. Integral stair, bar & reception desk with moveable components & wall for projection.</p>	Neutral/ Moderate	The spatial expression will be altered, however, the volume of the space can still be read and appreciated and there is no impact on the historic fabric.
M4	<p>Balustrade along the Mezzanine and Feature Stairs to be developed</p>	Neutral/ Negligible	The balustrade is necessary for compliance with building regulations and will allow for use of the mezzanine level. There is no impact on historic fabric and the visual impact is minimal.
M3	<p>Stair from Mezzanine to First Floor:</p> <p>Double stair reduced to single with timber balustrade</p>	Neutral - Beneficial/ Negligible	Visual impact is reduced.

N1	Open plan space to become restaurant ancillary to events, with bar and dumb waiter and banquette (or long bench) installed along the partially-glazed* partition wall. * The partition wall is glazed at upper level.	Neutral/ Negligible	Furniture will not be permanently fixed to the basebuild and the backrest for the bench will be interrupted to reduce visual impact. The partially-glazed partition will remain visually permeable, enabling legibility of the volume of the EHC.
M2	Stair enclosure: Fire curtain replaced with fire rated partition and fire door to Mezzanine.	Neutral/ Negligible	Negligible in heritage terms.
M1	Door omitted and replaced with wall to accommodate additional store with sink	Neutral/ Minimal	This omission is minor and impact on historic fabric and appearance is minimal.
N2	Indicative location for AV equipment trusses (no.2) underneath roof (existing trusses refurbished and painted)	Neutral/ minor	The structure will be another industrial element that goes with the ethos of the building. Refer to 1314_P_601 (View from Reception Area into main event/ exhibition/ lecture space showing approximate location and size of AV trusses)
1314_P_103 Rev C			
N1(A)	Meeting Room to become storage with glazed partition	Neutral/ Negligible	The partition is glazed, therefore visual impact is minimised.
N6	Area adjacent to Seminar Pods to become storage	Neutral/ Negligible	No impact in heritage terms.

N3	<p>Seminar Pods:</p> <ul style="list-style-type: none"> - Seminar 'Pods' layout broken up in two smaller clusters to enhance openness 	Neutral/ Moderate- Substantial	<p>The pods will visually alter the MGS first floor; however, historic significance is attributed to the structure of the MGS, namely the trusses, which will be left exposed and untouched. The pods will be detached and staggered to maintain the open spatial quality. The proposed work is reversible.</p> <p>Refer to 1314_P_601 (View from First Floor Reception Area onto Seminar Pods – conceived as 'volumes within a volume', detached from soffit)</p>
M5	Plant Room incorporated in tenant room fit-out		No impact in heritage terms.
N1(G)	Storage with partly glazed partition.	Neutral/ Negligible	No impact in heritage terms.
N1(H)	Main equipment (comms) room with partially glazed wall	Neutral/ Minimal	Low visual impact as the partition is glazed and minimal impact on historic fabric.
M3	<p>Stair from Mezzanine to First Floor:</p> <p>Double stair reduced to single with timber balustrade</p>	Neutral - Beneficial/ Negligible	Visual impact is reduced.
M1	<p>Toilet Pods:</p> <ul style="list-style-type: none"> - Internal Layout reconfigured to replace 'Superloos' with separate Male & Female provision. Number of toilet increased. - Unisex accessible toilet 	Neutral/ Minimal	The visual impact is neutral/minimal as the pods have already been base built under the previous consents; the proposals seek to alter the internal layout and access, which will not have a visual impact
N1(E) + N(F)	Food & Beverage Pantry & Store in lieu of Meeting Room	Neutral/ Minimal	Low visual impact as the partition is glazed and minimal impact on historic fabric.
N4	Store with sink	Neutral/ Negligible	No impact in heritage terms.

N1(B) + N(C) + N(D)	Seminar Rooms	Neutral/ Minimal	Low visual impact as the partition is glazed and there is minimal impact on historic fabric.
N2	Bar in Reception area	Neutral/ Minimal	The use of space is optimised. No impact to historic fabric.
M6	Selection of existing purlin to be locally removed to allow access	Neutral/ Minimal	Existing purlin is original. The impact of the proposed alteration upon significant fabric, plan form and appearance is minimal and it improves the circulation in connection with the proposed use.
1314_P_104 Rev C			
N1	<p>Roof Terrace:</p> <ul style="list-style-type: none"> - 6 No condensers (approx. L:1050/W:370/H: 1400) to be installed on the Roof Upper Level Terrace to Comms. Room below - Roof Terrace Balustrade: <p>Acoustic screening to West facing balustrade (WHC).</p> <p>Acoustic screen with gate introduced along East facing balustrade (Roof Garden)</p> <ul style="list-style-type: none"> - Stair revised to provide compliant landing in front of access gate 	Neutral/ Minimal	This is low impact as the fabric is not of particular significance. The condensers will be hidden behind a perforated screen reflecting the industrial nature of the buildings and is appropriate for the character and appearance of the heritage asset and its setting. Refer to 1314_P_600
N4	Duct Termination Kitchen ventilation (conical accelerator)	Neutral/ Minimal	This is low impact as the fabric is not of particular significance. The duct termination designs reflects the industrial nature of the buildings and is appropriate for the character and appearance of the heritage asset and its setting. Refer to 1314_P_600

N3	2 No ventilation cowls to WC Pods below with Chinaman hat	Neutral/ Minimal	This is low impact as the fabric is not of particular significance. The cowls termination designs reflects the industrial nature of the buildings and is appropriate for the character and appearance of the heritage asset and its setting. Refer to 1314_P_600
1314_P_212 Rev C			
N1	Indicative location for AV equipment trusses (no.2) underneath roof (existing trusses refurbished and painted)	Neutral/ minor	The structure will be another industrial element that goes with the ethos of the building. Refer to 1314_P_601 (View from Reception Area into main event/ exhibition/ lecture space showing approximate location and size of AV trusses)
1314_P_221 Rev C and 1314_P_236 Rev C			
M4	Selection of existing purlin to be locally removed to allow access	Neutral/ Minimal	Existing purlin is original. The impact of the proposed alteration upon significant fabric, plan form and appearance is minimal and it improves the circulation in connection with the proposed use.
1314_P_302 Rev C			
M1	Clerestory window: glazing of limited number of windows replaced with louvres, identical to approved type	Neutral/ Minimal - moderate	This alteration will be visible from the exterior to a minor degree. As the proposed louvres match the approved ones, the visual continuity will be maintained. Historic fabric will be affected by the proposal, however, this is minimal in heritage terms as the existing proportions and outline of the pilasters will be kept.

M1	New opening in new brickwork with louvre infill	Neutral/ Minimal - moderate	This alteration will be visible from the exterior to a minor degree. As the proposed louvres match the approved ones, the visual continuity will be maintained. Historic fabric will be affected by the proposal, however, this is minimal in heritage terms as the existing proportions and outline of the pilasters will be kept.
N1	<p>Roof Terrace:</p> <ul style="list-style-type: none"> - 6 No condensers (approx. L:1050/W:370/H: 1400) to be installed on the Roof Upper Level Terrace to Comms. Room below - Roof Terrace Balustrade: Acoustic screening to West facing balustrade (WHC). Visual screen with gate introduced along East facing balustrade (Roof Garden) - Stair revised to provide compliant landing in front of access gate 	Neutral/ Minimal	This is low impact as the fabric is not of particular significance. The condensers will be hidden behind a perforated screen reflecting the industrial nature of the buildings and is appropriate for the character and appearance of the heritage asset and its setting.

Impact Assessment Summary

17. Following revisions to these proposals, to address pre-application feedback from the Council and Historic England, it is considered that these proposals will be beneficial to the listed building and will preserve / enhance the character and appearance of the Regent's Canal Conservation Area. The proposals are consistent with local planning policies and national conservation principles, particularly NPPF policy principles guiding the determination of applications for consent relating to all heritage assets.

Planning Policy Considerations

NPPF CONSIDERATIONS

18. In March 2012, the National Heritage Policy, Planning Policy Statement 5 (PPS5) was replaced by the National Planning Policy Framework (NPPF). The NPPF sets out the Government's planning policies for England and outlines how these should be applied. The

relevant local plan policies contained within the Borough of Camden's Development Policies Document and Core Strategy will also be considered.

19. This section discusses the impact of the proposals according to the NPPF. 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 contained within paragraphs 18 to 219. The conservation of heritage assets is one of the NPPF's 12 core principles.
20. *Paragraph 132. When considering the impact of a proposed development on the significance of a designated heritage asset, 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 a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*
21. **Response:** It is considered that the proposed works will not cause "substantial harm" to the significance of the Grade II listed building and indeed offer potential for enhancement. There will be no substantial demolition and any fabric to be removed or altered will not affect the medium to high evidential value of the building. The work will be carried out to the highest of conservation standards. Any additions, whilst therefore responding positively to the architectural language of the building, will be clearly discernible and will be completely reversible.
22. *Paragraph 134. 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, including securing its optimum viable use.*
23. **Response:** The removal of any original fabric must constitute "less than substantial harm". We consider this level of harm to be outweighed by the considerable public benefits of the proposals, namely:
 - securing the optimum viable use of the spaces which are otherwise uninhabitable and unusable;
 - repairing and reconditioning of original fabric and investment in the maintenance necessary for long-term conservation of the building;
 - sustaining and enhancing the key elements which contribute to the significance of the listed building;
 - enabling public access to those spaces allowing heritage to be "revealed" for the first time, thereby also enhancing the heritage significance of the building;
 - reinforcing and making accessible the history of the area, particularly the Regent's Canal Conservation Area and surrounding heritage assets with links to the industrial past;
 - furthering the understanding of our surroundings and our past, generating a stronger sense of place.

The proposed works therefore will preserve, maintain and enhance the overall heritage significance of the building.

24. *Paragraph 137. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.*
25. **Response:** The proposals will not affect the setting of any designated heritage assets, including the Regent's Canal Conservation Area, because the external proposals are minor. Indeed, these areas of the listed building are currently unusable and there is no public access, meaning there are very limited opportunities to appreciate and to understand the heritage significance of the asset. The proposals will better reveal the significance of the building by enabling public access to these currently restricted areas, thereby enabling an enhanced appreciation of its high architectural and historical interest.

NPPF Planning Practice Guidance (PPG) – March 2014;

ID 18a: Conserving & enhancing the historic environment (Updated: 10 04 2014)

PPG Paragraph: 003 - Reference ID: 18a-003-20140306

26. What is meant by the conservation and enhancement of the historic environment?

The conservation of heritage assets in a manner appropriate to their significance is a core planning principle. Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural, economic and environmental benefits.

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in everyday use to as yet undiscovered, undesignated buried remains of archaeological interest. (...)

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified, the aim then is to capture and record the evidence of the asset's significance which is to be lost, interpret its contribution to the understanding of our past, and make that publicly available.

27. **Response:** The proposals recognise that the conservation of heritage assets must be in a manner appropriate to its determined significance and that heritage assets are an irreplaceable resource. This is implicit in the proposed development. Equally important is the definition of 'conservation' as the 'active process of maintenance and managing change'. The subject site is not a static place. It has been subject to change and in order to remain a sustainable welcome and pleasing place it will continue to change. The proposed scheme has been driven by the need to ensure a sustainable solution for the site in conjunction with a positive and imaginative response to the significant context. The proposed scheme will represent a sympathetic yet contemporary approach recognizing the heritage significance of the building.

PPG Paragraph: 009 - Reference ID: 18a-009-20140306

28. Why is 'significance' important in decision taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

29. **Response:** Heritage assets can be adversely affected by physical change or change in their setting. It is contended that the nature, extent and importance of the significance of both the East Handyside Canopy and Midland Goods Shed (level 1) has been properly assessed thereby enabling an acceptable and justifiable proposal to be developed. Key to this process has been the consideration of the impact on the historic environment which in this case is positive and enhancing.

PPG Paragraph: 017 - Reference ID: 18a-017-20140306

30. How to assess if there is substantial harm?

(...) Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.(...)

31. **Response:** The impact on the significance of the building has been fully considered in the proposal. The proposals are not considered to cause substantial harm.

PPG Paragraph: 019 - Reference ID: 18a-019-20140306

32. How can proposals avoid or minimise harm to the significance of a heritage asset?

A clear understanding of the significance of a heritage asset and its setting is necessary to develop proposals which avoid or minimise harm. Early appraisals, a conservation plan or targeted specialist investigation can help to identify constraints and opportunities arising from the asset at an early stage. Such studies can reveal alternative development options, for example more sensitive designs or different orientations, that will deliver public benefits in a more sustainable and appropriate way.

33. **Response:** This Heritage Statement documents the extensive assessment which we have undertaken for this application. Visual inspections of the site informed constraints and opportunities and there was a conscious effort to minimize the impact of the proposed alterations and additions to the fabric of the listed building. It is considered that "less than substantial harm" is caused to the listed building by the removal of some original fabric, none of which can be considered as "key" or essential to the overall heritage significance of the asset.

PPG Paragraph: 020 - Reference ID: 18a-020-20140306

34. What is meant by the term public benefits?

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 7). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a

private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Public benefits may include heritage benefits, such as:

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation*

35. **Response:** Public benefit should deliver economic, social or environmental advantages and should result or 'flow' from proposed development. It should benefit the public at large and should not just be a private benefit. Interestingly, such benefit is further described as not always having 'to be visible or accessible to the public in order to be genuine public benefits'. Public benefits include heritage benefits and include:

- optimum viable use of the spaces which are otherwise uninhabitable and unusable, thereby ensuring the long-term use and preservation of the building;
- public access to those spaces allowing heritage to be "revealed" for the first time, therefore enhancing enjoyment of it and the sense of place.
- repair of original fabric;
- increasing accessibility to and participation in the historic environment;
- contributing to and better facilitating the impacts of heritage tourism on the historic environment and wider community.
- making a positive contribution to economic vitality and sustainable communities.

In this way, and according to this definition, the development proposal represents tangible public benefit in its total sense.

Camden Development Policies 2010-2025

DP25 Conserving Camden's Heritage

36. To preserve or enhance the borough's listed buildings, the Council will:

- *e) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;*
- *f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and*
- *g) not permit development that it considers would cause harm to the setting of a listed building.*

37. **Response:** The proposals do not include any substantial demolition to the listed building, only alterations and additions. The whole design process has been guided by a detailed understanding of the key elements and contributors to the significance and special interest of the building; the proposals have therefore been designed not to cause any harm to these contributors, which will be left untouched, repaired or reconditioned. The original fabric which will be lost contributes little or nothing to the special interest of the building; the "less than substantial harm" that arises from this loss will be mitigated by the significant

public benefits arising from the proposals. The setting of the listed building is not compromised in any way, or other settings of other heritage assets in the immediate vicinity. The proposals therefore comply with Policy DP25.

Camden Core Strategy 2010-2025

CS14 Promoting High-Quality Spaces and Conserving our Heritage

38. The Council will ensure that Camden's places and buildings are attractive, safe and easy to use by:

- *requiring development of the highest standard of design that respects local context and character;*
- *b) preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;*
- *d) seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible.*

39. **Response:** The proposals will be carried out to the highest standards of design and workmanship in order to preserve, sustain and enhance the heritage significance of the listed building; all intervention will be undertaken and overseen by experienced conservation professionals and as much of the removed original fabric as possible will be salvaged complete and reused. The architectural language and features of the building will be reflected and respected in the detailing to the new openings, but the design of the spaces is a modern imaginative response to the challenging context which will have little or no impact on the original fabric. The proposal will better reveal the significance of the building in terms of its high architectural and historical interest by enabling public access, and allowing an appreciation and interpretation of its design and historic uses. These fascinating spaces which played an important role within the industrial story of Camden and the surrounding area are currently unusable and uninhabitable; by opening them up and utilising them to their optimum viable use, the proposals will help to generate a stronger sense of place and carry substantial economic, social and environmental benefits. The proposals will also ensure the long-term maintenance and preservation of the listed building thereby securing its future preservation and use. The proposals therefore comply with Policy CS14.

CONCLUSION

40. The application seeks Listed Building Consent for the alterations described above and believes that the nature of the mix of uses combined with the long term ownership commitment of the owner guarantees the future conservation of this important listed building which dominates the local area and the setting of numerous heritage assets, including the Regent's Canal Conservation Area. The uses proposed represent a sustainable alternative to the original space.
41. The interventions into the historic fabric constitute "less than substantial harm" and such harm is more than adequately mitigated by the substantial economic, social and environmental benefits of the proposal.
42. The proposals represent the optimum viable use of the Grade II listed East Handyside Canopy and Midland Goods Shed (level 1) at King's Cross. The PPG states at Paragraph 015 that:

"It is important that any use is viable, not just for the owner but also for the future conservation of the asset. Viable uses will fund future maintenance. It is obviously desirable to avoid successive harmful changes carried out in the interests of successive speculative and failed uses. If there is a range of alternative ways in which an asset could viably be used, the optimum use is the one that causes the least harm to the significance of the asset, not just through necessary initial changes but also as a result of subsequent wear and tear and likely future changes. The optimum viable use is not necessarily the most profitable one. It might be the original use, but that may no longer be economically viable or even the most compatible with the long-term conservation of the asset".

43. Historic England "Conservation Principles" and the NPPF define conservation as "managing change". Buildings are dynamic environments that have been subject to change and in order to remain a sustainable, welcoming and pleasing place they will continue to change.
44. Furthermore, the applicant has recognised the importance of undertaking investigations and analysis necessary for the assessment of the effects of the proposed works on the special interest of heritage assets. This approach has been both beneficial with regard to the consideration of alternatives and important with regard to the process of acknowledging the best practice guidance as outlined in NPPF. The proposals have been assessed against the significance appraisal and found to be in compliance with national and local plan policies.
45. The permitted scheme 2014/1433/P and 2014/1436/L as well as the current proposals are all based on an agreed conservation approach to create additional new spaces, with minimum impact on both the MGS and EHC and their setting.
46. The proposals are considered to sustain and enhance the special historic and architectural interest of both the MGS or EHC by preserving and enhancing 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 policies and national conservation principles and therefore there must be a presumption for its approval.

**Stephen Levrant: Heritage Architecture
Architects and Heritage Asset Consultants**