



Historic England

LONDON OFFICE

Ms Jenna Litherland
London Borough of Camden
Town Hall
Argyle Street
London
WC1H 8ND

Direct Dial: 020 79733775

Our ref: L00484672

16 November 2015

Dear Ms Litherland

**Arrangements for Handling Heritage Applications Direction 2015 &
T&CP (Development Management Procedure) (England) Order 2015**

**Authorisation to Determine an Application for Listed Building Consent as Seen
Fit**

**COAL DROPS YARD, STABLE STREET, KING'S CROSS CENTRAL, LONDON ,
N1C 4AB
Application No 2015/6016/L**

Applicant: King's Cross Central General Partner Ltd
Grade of building(s): II
Proposed works: Refurbishment of the Eastern Coal Drops together with its adjacent viaduct (including, refurbishment of the fire damaged northern section of the Eastern Coal Drops) to facilitate retail uses (Use Classes A1, A2, A3 and/or A4). Development comprises the demolition of the single storey office building at the southern end, works to facilitate formation of a new roof-level extension linking the Eastern and Western Coal Drops, alteration of some internal levels, removal of infills to some arches to allow the formation of shopfronts and entrances, installation of new stairs and lifts, works to allow for the addition of two bridge connections from the viaduct to the Western Coal Drops viaduct, works to allow a bridge connection at the southern end of the viaduct to the Wharf Road Arches at viaduct level and three bridge connections to Stable Street, cutting back of the northern 12 bays of the viaduct and the removal of the modern timber porches on the viaduct.

Drawing numbers: Drawings as approved

Date of application: 30 October 2015



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Date of referral by Council: 30 October 2015
Date received by Historic England: 2 November 2015
Date referred to CLG: 16 November 2015

You are hereby authorised to determine the application for listed building consent referred to above as you think fit. In so doing Historic England would stress that it is not expressing any views on the merits of the proposals which are the subject of the application.

Yours sincerely

[Redacted signature]

Thomasin Davis
Business Officer
E-mail: Thomasin.Davis@HistoricEngland.org.uk

[Redacted text] is not valid unless it has been appropriately endorsed by the Secretary of State.



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Ms Jenna Litherland
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Direct Dial: 020 7973 3774

Our ref: P00484750

16 November 2015

Dear Ms Litherland

**COAL DROPS YARD, STABLE STREET, KING'S CROSS CENTRAL, LONDON,
N1C 4AB**

Thank you for formally consulting us on the submitted proposals. Historic England considered the proposals in detail at pre-application stage, and we provided detailed advice following the presentation of the scheme by the applicants to our London Advisory Committee earlier this year.

The submitted proposals are very similar to the proposals we considered and commented on a pre-application stage, so I have enclosed our advice letter from 30 June 2015. The detailed advice in that letter remains valid for the current submitted application, and therefore the advice set out here should be considered in conjunction with the 30 June 2015 letter.

We note that the proposals have been considerably refined since we considered them at pre-application stage, and more historic fixtures and fittings will be retained and repaired. We welcome these improvements.

We also note the justification set out in the supporting documentation for the less than substantial harm that the proposals will cause to the listed building and surrounding conservation area. We agree that the overall public benefits of the proposals as set out in the Planning Statement are significant, and include the heritage benefit of securing a viable future for the historic buildings.

In that regard, provided that your council is persuaded that the harm is necessary in light of the existing outline consent, we have no objections to the proposals. Should you be minded to grant consent, would urge you to condition any consent adequately in order to ensure that the heritage and public benefits identified are achieved.



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Yours sincerely



Michael Dunn

Principal Inspector of Historic Buildings and Areas

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cc: Argent



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Mr Ed Watson
London Borough of Camden
Town Hall Extension
Argyle Street
London
WC1H 8EQ

Direct Dial: 020 7973 3774

Our ref: PA00348465

30 June 2015

Dear Mr Watson

Request for Pre-application Advice

EASTERN COAL DROPS AT KING'S CROSS GOODS YARD , N1C

The current pre-application proposals for the Eastern and Western Coal Drop buildings at King's Cross were presented to our London Advisory Committee on 25 June. The Committee considered the proposals in detail, and their views have informed Historic England's formal pre-application position.

Summary

We support the overall aspiration to restore these historic buildings and make them the focus of a unique retail destination, and we acknowledge that, due to their poor condition and complicated layout, significant investment is required so that a repair and re-use scheme within the existing envelopes is unlikely to offer a viable long term solution. We recognise that the Heatherwick Studio design for an extension that links the two coal drops buildings will enable a viable use for the site, but we believe it will result in some harm to the listed building and surrounding conservation area. In our view, however, the harm is less than substantial. We believe that there are very significant heritage benefits arising from the repair and re-use of the buildings. If it can be demonstrated that such an intensification of use is necessary to deliver a long term future for the Coal Drops this benefit, alongside that to the conservation area arising from having a successful and vibrant site at its heart, as the potential to decisively outweigh the harm we have identified.

Historic England Advice

Our statutory remit is the impact of the proposals on the historic environment. Our advice below is based on an understanding of the historic environment affected by the proposals, and an assessment within the context of national planning policy as to whether the proposals harm, retain or enhance this significance.

Significance of the historic environment



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The Coal Drops were established between 1851 (Eastern) and 1859 (Western) by the Great Northern Railway (GNR) as a major component of the King's Cross Goods Yard to distribute coal from the north-east and Yorkshire to the London Market. They were probably designed by Lewis Cubitt. Although the site has undergone substantial alterations and changes of use since its construction, evidence of the buildings' original purpose and the method by which coal was distributed remains legible. They are located within Regent's Canal Conservation Area and adjacent to the grade II listed granary (now the University of the Arts), with which they form a highly significant group of Victorian industrial buildings. The Eastern Coal Drops building is listed at grade II because it is older, more substantial and better preserved than the Western Coal Drops building, which is unlisted.

The significance of the site is derived from the well preserved industrial archaeology that tells us about how coal was unloaded and distributed during the Victorian period. The coal was required for the adjacent gas works and was the main fuel allowing the great industries and urban centres of the country to operate, thereby underpinning the wealth of the country. The site also possesses considerable historical value for its evocative illustration of the Victorian industrial heritage of the King's Cross Goods Yard and its changing function from coal distribution to warehousing, before its decline and abandonment in the late 20th century. There is aesthetic value in the simple, robust architecture that characterises both buildings. The brick buildings are essentially utilitarian and machine-like, yet they display surprisingly elegant features such as decorative cast iron columns and fine brick arches.

Overall, the significance of the site diminishes at its northern end. This is due to the damage to the grade II listed Eastern Coal Drops caused by a fire in 1985, and the subsequent reduction of surviving fabric here.

The proposals and their impact

The design approach as we understand it is to provide a structure at roof level that bridges the yard between the Eastern and Western Coal Drops buildings. The design is based around the concept of 'peeling away' the courtyard roof structures upwards and inwards until they meet above the courtyard between the two buildings. The new curved roof will be covered in slate to match the existing and retained roofs, so that both appear as a seamless whole. A pair of lightweight and sculpted cantilevered slabs provide the floor and soffit at eaves level across the yard, above which glazing rises to the new 'peeled away' roof structures to form the interior space of the extension, which includes a large single retail space and circulation core. The outward facing roof slopes of both buildings will remain unchanged. Where their removal is necessary, existing Victorian roof trusses will be re-used in the burnt out section of the building in a way in which they can be viewed and appreciated. The existing viaducts to both buildings will be retained in full, apart from the northern part of the Eastern



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Coal Drops Viaduct, which currently sits atop a working sewer and needs to be reduced in width here to allow for sewer maintenance. A simple lightweight bridge structure will connect the east and west viaducts across the middle of the courtyard. New staircases will be provided within the viaduct of the Western Coal Drops to provide access from the ground to the upper levels.

The historic buildings will be fitted with shop and restaurant/cafe units that correspond with the existing openings and bay structures as far as possible. Although some openings and interiors will require alterations (including for DDA), the general approach is to conserve the surviving fabric with a minimum of changes and retain the legibility of the historic changes of use. The surfaces of the courtyard and viaducts and their street furniture will be carefully considered to retain the industrial character of the place whilst allowing for current DDA requirements.

Policy context

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 makes it a statutory duty for Local Planning Authorities to consider the impact of proposals on listed buildings and their settings. Section 72 requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

Guidance on the fulfilment of statutory planning duties is set out in the Government's National Planning Policy Framework 2012 (NPPF). Fundamental to the NPPF is a presumption in favour of sustainable development. This includes a core principle which states that heritage assets should be conserved in a manner appropriate to their significance. Section 12 of the NPPF deals with the conservation and enhancement of the historic environment, and includes a number of paragraphs of direct relevance to this case.

Paragraph 131 states that local authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 132 states that local authorities should put great weight on an asset's conservation, and the more important the asset the greater the weight of consideration. The significance of an asset can be harmed by development within its setting.

Paragraphs 133 and 134 advise that where proposals would lead to substantial or less than substantial harm to the significance of a designated heritage asset, harm needs to be weighed against public benefits. The tests in 133 to justify substantial harm are necessarily more rigorous.



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Paragraph 137 states that local authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance.

Historic England position

The starting point for approaching the development of the Eastern and Western Coal Drops is the conservation of significance of the site and the wider conservation area. Any new development that involves causing harm to that significance should be the minimum to ensure long term viability. It should be of a scale and design that would maintain, and where possible, enhance the significance of the retained and conserved elements of the listed and unlisted historic buildings and the character of this part of the conservation area. The Coal Drops site is intended to be the principal retail hub of the King's Cross Central development, and an international retail destination. As such, we accept that the offer must be unique and unlike any other in London. Whilst the cellular nature of the historic buildings offers opportunities for unique retail spaces, we understand that these spaces alone do not provide a sufficient critical mass to ensure a viable and sustainable retail destination. This will have to be fully demonstrated in any application.

The buildings are in very poor condition and require significant investment in repair. A further key requirement to bring the historic buildings back into use for retail is the creation of level access into and across the buildings and the wider site from Granary Square, Lewis Cubitt Square and Gasholder Gardens. The roof level extension is intended to contribute to this connectivity as well as create a unique retail space for a large anchor tenant. This will help justify the investment in repair and conversion, and provide a balanced retail offer with the smaller cellular units within the historic buildings.

We acknowledge that the Heatherwick design is ambitious, and is in contrast to the simple industrial aesthetic of the utilitarian Coal Drops buildings. This departure from the traditional low scale and simple architecture of the buildings will cause some harm to the significance by eroding the legibility of their historic function. It is when viewed from the north or south that the new extensions appear most visually prominent against the host buildings. However we believe that the harm to the listed and unlisted buildings caused by the proposal is less than substantial, in part because the extension is located in the less significant northern part of the site. It is proposed to take a repair based approach to the more significant southern part of the site where the survival of the buildings is more complete. The impact on the special character of the conservation area arising from the extensions is modest and the design approach echoes that taken successfully at the Granary building adjacent to the site.

The harm identified above requires clear and convincing justification and needs to be



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weighed against the benefits that the scheme will deliver. The careful repair, restoration and re-use of the most significant elements of both buildings are heritage benefits that will have a significant positive impact on the listed building and the character and appearance of the conservation area. We believe that the proposed extension is of very high design quality and makes use of traditional materials appropriate to the listed building and its context, factors which mitigate its impact.

The NPPF sets out a presumption in favour of sustainable development, which includes conserving heritage assets in a manner appropriate to their significance. In our view, the principle of the proposed design approach conserves the heritage assets in a manner appropriate to their significance. The current proposals safeguard the most significant elements of the listed buildings and its surroundings, and focus new development on the less significant northern part of the site, which includes the fire-damaged shell of the Eastern Coal Drops.

Recommendation

The 'less than substantial' harm to the listed building and surrounding conservation area caused by the new extension has to be outweighed by the public benefits of the proposal, one of which includes securing the optimum viable use for the retained and restored historic buildings. In our view, the current proposals have the potential to meet this test, and we look forward to working together closely with the design team and Camden Council to ensure the highest quality proposals for this significant site.

Yours sincerely



Michael Dunn

Principal Inspector of Historic Buildings and Areas
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**EASTERN COAL DROPS AT KING'S CROSS GOODS YARD , N1C
Request for Pre-application Advice**

Information Provided

LAC presentation and site visit; images of current proposals; model

Published Guidance

NPPF; EH Conservation Principles



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