

Supplementary Information for Development Control Committee

17 December 2015

Agenda Item: 7 (application 5, 6 and 7)
Application Numbers: 2015/6015/P, 2015/6018/P and 2015/6016/L
Address: Coal Drops Yard, Stable Street, King's Cross Central, N1C 4AB

Since expiry of the consultation period, four late objections have been received, one from a statutory consultee (The Victorian Society) and three from local heritage groups. Each of the representations are reproduced below together with a response submitted by the applicant. The supplementary report then goes on to expand the assessment to address specifically the new points raised and propose additional conditions. The applicant has also requested that a series of preliminary sketches showing the evolution of the scheme be reproduced to assist the Committee's understanding of the extent to which the design and approach has been amended to address the views of both the Council and Historic England. All groups that have submitted representations were consulted as part of both the pre-application process and the application itself.

1. Additional consultation responses received.

1.1 The Victorian Society - Objection

“Thank you for consulting the Victorian Society on this application, which was discussed by our Southern Buildings Committee at its most recent meeting. I write now to convey their comments; we object to the proposals which represent an unnecessary level of harm to the listed building.

It is an innovative response to a desire for more space, though unfortunately the proposals pay no respect to the listed status of the Eastern Coal Drops, disfiguring the roofscape to the degree of substantial harm. It is proposed to demolish and rebuild the majority of the pitched roofs over both the Eastern and Western Coal Drops, warping them into something unrelated and of little relevance to the structures they cover. Key to the significance of the Coal Drops is their simple, industrial character and the Functional Tradition. These proposals turn them into something else. Furthermore, the Eastern Coal Drops are significant as probably the first of their kind where all of the functions were covered by an overall roof. The plain, pitched roof of the

Eastern Coal Drops is therefore paramount to its significance. Not many fully enclosed coal drops were built – meaning that very few have survived. Conserving the earliest example of this arrangement, as close to its original appearance as is reasonably possible, should be a priority. The proposals would also have a dramatic impact on the Conservation Area, particularly views from Granary Square. The gasholders (no.8, Grade II, John Clark, 1883), which are one of the more striking features of this development, will be obscured. This is a considerable impact on the setting of a listed building.

The proposals are a departure from the approved outline planning permission (2004/2307/P). This is significant given how hard fought over the master plan was – one of the key issues was the treatment of the listed buildings and this was crucial to the approval of the scheme. Several designated heritage assets have been demolished that those that were retained were to be sensitively treated. To stray from this, in such a manner that causes undisputed harm to a listed building, is not a desirable departure. It must be entirely justifiable, which is not demonstrated in the full planning application since other options do not seem to have been explored.

This also raises the issues of why outline consent for a site that includes so many designated heritage assets, with detailed consents to follow later, was considered to be controversial at the time. The parameters for development have been set for the whole site, rather than individual plots. The additional floor space this application presents may be counted against the site-wide totals of the outline planning permission, but this means that the listed building is now facing a far larger intervention than what it was allotted. It is not acceptable that the listed building should now take on a greater proportion of the site-wide parameters; this is a serious variation of the consented conditions. Had this been proposed in the outline planning permission, central to which is the sensitive restoration of historic buildings, it is unlikely that consent would have been granted. This is why it is crucial that the master plan is adhered to.

It is suggested that the latest proposals are ‘in line with the principles of the Outline Planning Permission’. They are not – the principles of the outline consent include the Initial Conservation Plans that were submitted for each heritage asset. For the Eastern and Western Coal Drops these were to be sensitively refurbished as indicated by the specification of works and the site-wide CGIs. The built heritage value of both structures was considered to be ‘high’ and ‘very high’ respectively. The proposals do not reflect this; the demolition of the majority of both roofs and canopies is sought. ‘Roof trusses that typologically relate to others in the Goods Yard complex’ are frequently cited with regard to the Coal Drops, now most are to be lost. In the outline planning permission, the importance of the canopy of the Western Coal Drops is specifically referred to. It is stated that ‘suitably repaired, it would give identity to the building’ and even the notion that canopies are too often lost when railway buildings are reused is mentioned. Despite being a later addition of 1897-9, it is a distinctive feature which conveys railway use; the canopy should be retained.

It is also asserted that the proposals have substantial public benefits, which outweigh the acknowledged harm to the heritage assets. The overall planning and public benefits submitted are all present in the outline planning permission, which saw the Coal Drops refurbished without the addition of an extra level. The benefits this scheme presents should strictly refer to the benefits that the extra level will bring. These are must be relatively minor and could be achieved in a less damaging scheme. We therefore recommend that consent for this planning application is refused.”

1.2 The Islington Society – Objection

In 2004 the Islington Society, responding to the proposals submitted by Argent for the whole Kings Cross Railway Lands site, welcomed them in many respects, as follows: "First, the fact that after decades of blight, the prospect that something will happen Second the degree to which the heritage of the site is being respected in the plans...". We also welcomed “the provision of strong north-south routes close to the desire line... However, the chosen route may compromise the Camley Street Natural Park, as there are conflicting needs...”

The Society's concern for the conservation of built heritage, for open space, and for movement patterns were central to its comments. The proposals now submitted for the Coal Drops are in conflict with many of those concerns:

1. The proposals for the heritage of the site that we welcomed did not include the additional storey on the Coal Drops nor the linking of the two blocks and the covering of the courtyard between them.
2. The open air character of the site and the plain functional character of the industrial/railway buildings was to be respected.
3. The curving up of the slated roofs now proposed, to accommodate the extra storey, is out of keeping with the plain architectural character and with the straightforward constructional technology of the Coal Drops.
4. At the same time the courtyard space below will be much darkened by the bizarre structure bridging it overhead, and its character as open space - which is in short supply generally in the development - will be compromised.
5. The development of the Coal Drops as two rows of small retail units and craft workshops almost like an open air market, which is well illustrated in Urban Design Statement para 4.8 forming part of the Approved plans, will be lost, giving it more the character of an enclosed shopping mall.
6. Without having full details to hand it looks as though, if there is a need now perceived for a retail unit with a larger floor space, it might be provided at ground level linking the Coal Drops at their northern end, rather as Waitrose does at the Brunswick Centre, with a route across it from the upper level of the Coal Drops to Lewis Cubitt Square to the north.
7. Other options should, in our view, be investigated that would be less of a transformation of the character of these listed buildings and retain the sense of open space.

We recommend that the present applications relating to the Coal Drops be refused'.

1.3 King's Cross Development Forum – Objection

“The King's Cross Development Forum was set up so that people living or working in King's Cross could have a say in the future of the area and the development of the old railway lands. Its composition can increasingly represent the occupants of the King's Cross Central development site now that is becoming occupied; for example, already more than half the members of its Steering Group live there. This response reflects the views expressed at a meeting of the Forum following the submission of the planning application.

In the opinion of the Forum, the proposal does not adhere to the principles of the outline planning permission and should be rejected. The Forum endorses completely the response by the Victorian Society. From its own perspective, as representing the occupants, the Forum makes the following additional comments:

1. The supposed reason for the new upper level between the Coal Drops is a need for a large space for a large retailer. Yet Covent Garden and Camden Market, which form the usual points of comparison with the site, do not need such spaces. A very solid business case for needing such a space would be required to justify this significant deviation from the outline planning permission. Certainly “the quantum of retail space that the existing buildings would deliver is comparatively small” (in the words of the Design and Access Statement) is not a justification, when there are large amounts of retail space throughout the whole development: the Retail Statement notes that King's Cross Central is comparable with major shopping centres such as Camden Town.
2. The outline planning permission, and subsequent publicity illustrations, envisaged the Coal Drops as two rows of small shops, such as craft workshops. The new upper level for a large retailer would change this in various respects: by adding about 30% to the retail floor space it would suggest a character and level of rents more appropriate to an indoor shopping mall than to such workshops.
3. The Design and Access Statement claims that “the new upper level should be an architectural statement that forms an attraction in its own right”, so that the site is marked out as distinctive. This is unfair both to the Coal Drops themselves, which with sensitive treatment could be very attractive to shoppers, and to the work done elsewhere in the King's Cross Central area. The existing buildings do not need to be contorted into a ‘flagship’ or a ‘gateway’: they can speak for themselves, without rococo flourishes such as the curved roof.
4. Though the scheme would preserve parts of the buildings, it would not articulate their original purpose well. In the Western Coal Drops, the canopy would be destroyed to make way for the new upper level. In the

Eastern Coal Drops, much of the original brickwork would be removed from the northern half, thereby negating a primary reason for the listing of the building and making the coal drop cells almost impossible to appreciate. These cells remained largely complete on all three levels until the 1985 fire; the dividing walls and many of the (now, charred) beams that carried the railway survive. In a conservation-led development this evidence of a remarkable structure should not be lost to our history but instead used for partial reinstatement.

5. The massive curved roof of the new upper level would dominate the site, as shown in the Design and Access Statement (in Figures 5, 6, 11, 43 and 44, for example). It would not be an intervention like those at the University of the Arts and at King's Cross Station, where the new structures fit fairly comfortably and respectfully alongside the old ones. The roof outline would be prominent from Granary Square and clash with the functional characteristics of the gasholders and other historic buildings.
6. The images in the Design and Access Statement (such as Figures 44 and 45) also depict the inside of the new upper level as a transparent, almost invisible, empty glass shell; it would be nothing of the kind, as it would be filled with department store fittings that, with the roof, would obtrude on the views of the site from both ends of the Coal Drops.
7. The new upper level would greatly darken the space beneath; this would feel in effect more like a rather draughty and gloomy building than part of the open space. The King's Cross Central area has very high density and can ill afford to have its open spaces restricted in this way.

1.4 Regent's Canal Conservation Area Advisory Committee - Objection

1. In reviewing the conservation implications of this massive scheme, we have started with the fact that the scheme is strongly supported by English Heritage. Visually and in gaining public appreciation of these historic buildings, we can see that the roof changes have both pros and cons. In regard to the remodelling of levels, we accept that some adjustment is desirable to facilitate retail uses as already approved in the outline consent and for better accessibility. We considered that the considerable length of the two ranges should be able to accommodate the adaptation of parts while respecting the historical and archaeological integrity of other parts, towards the ends of both ranges, which seemed to be the message from pre-application presentations. However, after going through the application documents in detail we conclude that the proposals have gone too far, damaging or concealing the building's intrinsic heritage, and therefore some significant modifications are needed.
2. A particular concern is that the proposals would largely obscure rather than bring out the original function of the coal drops, so they would not fulfil the objective of better revealing and enhancing the buildings'

significance. The buildings are of remarkable historical and archaeological importance and, although altered, there is much detailed evidence in the internal fabric to show their original character and how they worked, with trains of coal wagons travelling north to south upon railway tracks supported on beams at the upper level and depositing their loads into hoppers above the mezzanine level (which in the case of the WCD were suspended by rods from the cast-iron beams above – still a 3-level arrangement), the coal then being bagged up and taken away at yard level. Below rail level, the operations took place in rectangular cellular compartments. The evidence is not well addressed in the Heritage Statement.

The buildings' external form does not directly demonstrate the internal functions and the evidence particularly lies in the interiors. Unfortunately, while it is proposed to conserve much of the external form, the extensive nature of the proposed retail adaptations will leave very little of the internal evidence uncompromised. Thus, in the northern part of the ECD, where the brick cells survive intact, the alterations would leave only one full-height cell unaffected by extensive new openings destroying significant fabric (which the Heritage Statement glosses as 'substantially retained with limited interventions'). At the upper level there seems to be no proposal to reinstate the fire-damaged beams. At yard level, it is proposed to preserve one cobbled and kerbed floor of a cell (of which we believe several actually survive), but under glass so as not to impede retail operations, and that will relegate this feature to the status of an obscure relic. There is no mention of the reinstatement of salvaged fittings.

We therefore consider more effort should be made to present the coal drops aspects, at the expense if necessary of some retail space. From the increase in retail opportunity that the scheme creates, some reduction in the retail intensity locally should be well affordable.

3. Other concerns include:

- the amount of disruptive foundation works that the added weight of the new upper structure will entail.
- major difficulties in interpreting the original rail and viaduct levels when seen externally from the north – more hints should be provided and more weight should have been given to such considerations in the architectural design.
- the removal of all but two pairs of the roof trusses in the WCD, so that no vista of roof trusses will remain in that building.
- the insistence on removing nearly all the exceptionally characterful blue granite setts in the Yard, except in some very limited areas. There seems to be ambiguity between setts lightly sawn and setts heavily sawn. There should be more attempt to reinstate substantial areas through the use of sawing
- the lack of mention of the hoist mechanisms that remain at roof level in the southern part of the ECD, which should be preserved in situ.

4. We know you are recommending approval of this scheme and it would probably be fruitless to express concern over the intensity of activity that the proposed uses will bring to a limited space, or the public relations stance that these are old and decrepit buildings that need to be jazzed up.

2. Applicant's response to the additional consultation responses.

- 2.1 The applicant responds to each of the principal points raised briefly below. The response is framed with reference to the comprehensive material made available as part of and in support of, the reserved matters, full planning and listed building consent applications.

1. The Victorian Society say the proposals:

"pay no respect to the listed status of the Eastern Coal Drops, disfiguring the roofscape to the degree of substantial harm".

In reality, the proposals reflect proper, expert understanding of the historic environment and great sensitivity to the place and the important assets within it, including (but not only) the Grade II listed Eastern Coal Drops. The proposals have evolved working closely with officers from both the Council and Historic England and their judgement is that the proposals would lead to less than substantial harm on historic built fabric.

Since the grant of Outline Planning Permission in 2006, further work has been undertaken to better understand the buildings within the Coal Drops Yard, including recording work by the Museum of London Archaeology. The surveys undertaken are detailed within Section 2.1 of the Heritage Statement forming part of the planning submission. The Heritage Statement was produced by Giles Quarme & Associates, heritage and conservation experts. Giles Quarme & Associates have undertaken a detailed analysis of the heritage assets and their significance (Section 2 of the Heritage Statement) together with an assessment of the impact of the proposals on the significance of the heritage assets (Section 4.2 of the Heritage Statement).

The proposals are also assessed against current policy and guidance as well as against the refurbishment parameters of the Outline Planning Permission (Sections 4.3 and 4.4 of the Heritage Statement and Section 8 of the Planning Statement).

"Disfiguring" is clearly a subjective judgement. We contend that the new roofscape is a bold, high quality design that complements and enhances the historic environment and contributes to its confident re-purposing, as a successful and sustainable retail destination whilst allowing the original form and function of the heritage buildings to be read. The proposals achieve this with clarity of purpose and clarity of form, in the same spirit as our successful re-use of the Granary Complex (completed), Midland Goods Shed (completed),

Stanley South and German Gymnasium (completed), Fish and Coal (ongoing) and Gasholders (ongoing) and indeed the earlier redevelopment of St Pancras Station into St Pancras International.

The NPPF and Planning Practice Guidance notes that significance or heritage interest may be archaeological, architectural, artistic or historic and significance derives not only from an asset's physical presence, but also its setting. The significance of the Coal Drops Yard is derived from the well preserved industrial archaeology recording how coal was unloaded and distributed, and later its changing function to warehousing as the coal industry declined, as well as its relationship with the Granary and Fish & Coal buildings. It is our view that the proposals allow the significance of the listed building to be better revealed and understood through, for example, the removal of later detrimental additions and the retention of the linearity of the brick buildings (rather than linking the buildings at ground level, as suggested by the Islington Society).

The refurbishment works to, for example, the east elevation of the Eastern Coal Drops and the reinstatement of the northern section will enhance the setting of the adjacent listed Granary building. Similarly, the northern elevations have been carefully designed to ensure the buildings' original function is legible. When in use as coal drops, the northern elevations of both the Eastern and Western Coal Drops would have been open to allow trains to access. It is proposed that the large openings are fully glazed to enable understanding of the original function (see pages 57 – 59 of Section 1.3 of the Design and Access Statement).

2. The Victorian Society notes,

“demolition of the majority of both roofs and canopies is sought.” In relation to the roof trusses, *“now most are to be lost”*.

The Regent's Canal Conservation Area Advisory Committee also comment on the roof trusses, noting that there will be removal of *“all but two pairs of the roof trusses”* within the Western Coal Drop.

These statements are incorrect. In order to refurbish the roofs, the remaining slates will be removed, the sarking boards repaired and the slate replaced on a like for like basis following standard conservation practice. Currently, there is no roof to the northern fire damaged section of the Eastern Coal Drops and the western slope of the Western Coal Drop roof is covered in felt. There is currently an area of approximately 2,100 sqm of slate roof: the proposals would ensure that the existing slate roofs are replaced and lost slate roofs are reinstated providing approximately 2,600 sqm of slate roof (excluding the new Upper Level roof).

There are a total of 31 existing timber roof trusses within the listed Eastern Coal Drop, 21 of these would remain in situ, 5 would be moved from the location of the new roof to the fire damaged northern section (where no trusses survived) and 5 trusses will be removed. Overall, across both Coal Drop buildings, a majority of the roof trusses would be retained.

In relation to the canopy on the Western Coal Drop which was added in 1897, the asbestos covering has been removed and as many brackets as possible will be retained to the north and south of the new Upper Level (as discussed within the Design and Access Statement). Brackets within the area of the new Upper Level will be removed and used elsewhere within the proposed, for example, offered to retail tenants for use within units, where possible.

3. The Victorian Society objects that the gasholders (in their new location) will be obscured, referring specifically to gasholder no. 8, which has recently opened as a new (public) urban park. The Society refers to a “*considerable impact on the setting of a listed building*”.

This is simply wrong. The Coal Drops new roof structure does not obscure gasholder no. 8, which sits between Tapestry (T1), Plimsoll (P1) and behind the gasholders residential development when viewed from Granary Square. Gasholder no. 8 is not visible from Granary Square; only a small element is visible when standing on bridge BR1. The new roof structure of the Coal Drops will appear in front of and considerably lower than the gasholders triplet residential development, in views from Granary Square (see, for example, Figure 59 of the Design and Access Statement). The gasholders remain, very deliberately, highly prominent landmarks and this is apparent from the CGIs and images provided within, for example, the Design and Access Statement.

The maximum height of the Coal Drops Yard proposals is +44.85m AOD which is 23.85m above finished site levels. The proposals comply with Parameter Plan KXC013 (Development Massing) (of the Outline Planning Permission) which requires that no floorspace within Zone M is more than 30m above finished site levels. The maximum permitted height of the adjacent gasholder triplet residential development on Parameter Plan KXC014 is 64m AOD.

Our design teams have worked hard on these spatial and design relationships, in part to ensure that the gasholders apartments continue to enjoy good views past Coal Drops Yard across King’s Cross and London (i.e. they are not obscured). The wider objective has been to achieve a powerful, exciting and dynamic sense of place, one that does “harness the value of heritage” (to quote one of our original *Principles for a Human City* in 2001) to deliver and indeed optimise economic, social and environmental value.

4. We accept the Victorian Society’s third point, that “*the proposals are a departure from the approved outline planning permission*”. This and the impact on a “*hard fought over*” masterplan appears to be its principal objection. The Society asserts that:

“Had this been proposed in the outline....it is unlikely that consent would have been granted. This is why it is crucial that the master plan is adhered to.”

We agree that the proposals depart from the outline permission and that is why the applications include a new application for full planning permission. That does not, however, automatically make it wrong.

The comment about what might or might not have happened 10 years ago is pure speculation and not, I suggest, relevant to the determination now of new proposals on their merits. King's Cross has changed a lot in those 10 years and the bold, confident repurposing of historic buildings, structures and spaces has been at the heart of its ongoing regeneration. The retail environment has similarly altered, almost out of all recognition, for example with the growth in internet shopping, as set out in the Retail Statement (Section 3). In that context, we want the Coal Drops Yard to offer a distinctive and compelling retail experience, one that both makes the most of and enhances, its unique historic assets and King's Cross location.

The masterplan has never been frozen in aspic; an immovable plan to be "adhered to". To date, as you know, almost every one of our King's Cross projects has been submitted as reserved matters pursuant to the outline permission - we have invariably not departed from the outline permission. Moreover, the original masterplan layout of streets, squares, parks and gardens has been delivered, to some acclaim, over the last eight years of continuous development. At the same time, we have sought to enhance the proposals at every turn, in line with the developing tone and character of King's Cross and its sense of place. Gasholder Park with its (new) modern canopy and grassed lawn design is a recent example of where ideas and design have evolved. The Coal Drops Yard proposals have developed in that same context, this time in part outside the outline parameters but still seeking to *enhance* a now established masterplan and place; and in response to how retail and retail destinations are necessarily evolving.

As noted above, the Heritage Statement assesses the proposals against, among other things, the Initial Conservation Plan (ICP) which accompanied the outline application. It is recognised that although the form of part of the roof will be altered, the existing fabric of the buildings will be substantially retained, refurbished and, where lost in the fire, reinstated. In some instances, it has been possible to make enhancements to the ICP proposals, for example, the ramps proposed at viaduct level to mediate between the viaduct and internal levels to allow access to units were considered to be visually intrusive. Minor changes to the viaduct level and internal levels allow level access and removal of the proposed ramps. Also, the additional surveys since the ICP have led to the discovery of more original metal framed windows, which will be retained and refurbished.

5. The Victorian Society states that "*other options do not seem to have been explored*". The Islington Society also notes that other options should be investigated and suggest that the two Coal Drops might be linked at ground level at the northern end. A range of design options have been explored as explained in Section 1.2 of the Design and Access Statement. The design team spent several months considering a wide range of options which were explored internally and with both Council officers and Historic England at a number of workshops. These workshop studies examined how we might overcome some of the challenges of the Coal Drops Yard for retailing whilst seeking to complement and enhance the heritage buildings: the existing buildings deliver a

relatively low level of floorspace, on two levels and predominantly in small or very small units with limited opportunity to achieve larger 'anchor' units; and the buildings are spaced quite far apart. The studies considered therefore how to achieve greater "intensity" of retail offer, use, footfall and experience; a wider range of unit sizes, including anchor units and a single flagship store; and improved circulation.

These early studies included numerous iterations of adding massing at ground floor level within the central yard, vertically within the buildings and as part of a new upper level. These options are shown for information in the accompanying sample of imagery (compiled from pre-application discussions and workshops with stakeholders). It was considered that a new upper level best met the objectives for the proposal whilst maintaining the legibility of the heritage assets, allowing the linear form of the buildings to be read. Consequently this concept formed the basis of early pre-application discussions with officers at the Council. Subsequent workshops between Heatherwick Studios and Camden officers considered this concept further, having reviewed and discounted the earlier options.

The current proposals are the result of over a year of extensive consultation and workshopping between the applicant, design team, officers from LB Camden and Historic England. The proposal at roof level was further developed during this process to reflect feedback and input from Historic England, design and conservation officers of the Council and the input of the various stakeholders including the Regent's Canal and King's Cross Conservation Area Advisory Committees, as detailed in Section 4 and Appendix 4 of the submitted Planning Statement.

Pre-application consultation with the Regent's Canal and King's Cross Conservation Area Advisory Committees, and the King's Cross Development Forum was largely positive, with wide-ranging support from their membership. Wherever possible, comments made at those meetings have been incorporated into the scheme and are highlighted throughout the Design and Access Statement.

6. The Victorian Society states that:

"The parameters for development have been set for the whole site, rather than individual plots.....It is not acceptable that the listed building should now take on a greater proportion of the site-wide parameters."

This represents a misunderstanding of the outline permission and these latest proposals. The outline permission includes parameters for both the whole site and individual plots. The proposals represent an uplift in overall retail quantum at King's Cross, in order to achieve the "intensity" within Coal Drops Yard referred to above. As explained in the Planning Statement, the total floorspace applied for is 13,348 sqm GEA, of which 11,277 sqm GEA is being brought forward within the full planning application and 2,071 sqm GEA of floorspace is within the application for reserved matters approval. Rather than the full 11,277 sqm GEA sitting outside the Outline Planning Permission, the proposed Section

106 agreement will ensure than 10,084 sqm GEA will contribute to the original site-wide totals. The remaining 2,937 sqm GEA (plus 327 sqm GEA of plant and cycle stores) will be over and above those site-wide totals and this new provision has been tested for retail impact, on that basis (see the Retail Statement).

As noted, the submitted Retail Statement considers in detail the proposed uplift in retail area and concludes that there would be negligible impact upon existing centres: the nature and scale of the proposed development would not have any negative trading impacts on existing retail centres. Indeed, it is evident that there is unmet demand for additional retail floorspace within the King's Cross area: the proposed uplift in floor area would go some way to meeting this demand.

7. The Islington Society comments on the "open air" character of the site and that the "*bizarre structure bridging it overhead*" will compromise and "*much darken*" this character. The King's Cross Development Forum raise a similar point.

The new Upper Level is two storeys above Yard level. The footprint of the Upper Level is shaped rather like an hour glass, in that it narrows to approximately 6.5m at soffit level at the point the western and eastern sides meet. As detailed within the Drawing Package (drawing reference PL-1016) and the Design and Access Statement, the new Upper Level sits towards the northern end of the site leaving the southern wider part of the Yard completely open. This new public space will add to the extensive public spaces already delivered at King's Cross, including the adjacent Granary and Cubitt Squares and the recently opened Gasholder Park.

8. Both the Islington Society and the King's Cross Development Forum comment that vision of the Coal Drops as "*two rows of small shops and craft workshops*" would be lost. The Islington Society notes that this is well illustrated at paragraph 4.8 of the Urban Design Statement (2004). In fact, that paragraph of the Urban Design Statement actually states, "*[o]n both levels, the Coal Drops are occupied by a range of shops, restaurants and cafes – large and small, mainstream and independent – and other public uses.*"

We understand that you are proposing a condition to ensure that at least 30 of the retail units will be no larger than 200sqm to address the requirements of development plan policy and to ensure, as envisaged at the outline stage, a mix of unit sizes, including the provision of smaller units.

9. The Regent's Canal Conservation Area Advisory Committee raise a concern regarding the amount of disruptive foundation works that the added weight of the new Upper Level will entail. The new roof structure is proposed to be independent of the original building. It would be supported on a set of new steel columns that would be located within the buildings, adjacent to the existing cross-walls: none of the new load would be carried on the existing fabric. The new columns have been carefully located so as to minimise the amount of existing floor fabric that is disturbed to install them. The new columns are proposed to sit on piles that have been carefully located so that they do not interfere or undermine the existing foundations of the buildings.

It is also worth noting that there is only one surviving cobbled bay, contrary to comments within the Regent's Canal Conservation Area Advisory Committee's representations, as recorded by Museum of London Archaeology (MOLA) in 2014/2015.

10. In relation to the Regent's Canal Conservation Area Advisory Committee comments regarding the original granite setts within the Yard, the proposals seek to achieve a balance between heritage and accessibility requirements. Sawn granite setts have been used extensively across the wider King's Cross site, including at entrances to buildings, for example, the Granary building. From experience on site to date, it has been concluded that the re-use of historic setts at building thresholds even when sawn does not provide fully level access. During discussions with the Council's access officer, the Council have requested the use of new granite setts to ensure the area is fully accessible. Original and sawn setts are used as extensively as possible in areas where accessibility will not be affected.
11. The remains of the hoist mechanism, mentioned by the Regent's Canal Conservation Area Advisory Committee, and its associated shaft are in poor condition. Its retention would prevent the opening up of the historic 1851 arch behind. It has been recorded as part of the MOLA work (see Section 2.1 of the Heritage Statement) and any further archaeological features revealed in the future would similarly be fully recorded, if not retained, in accordance with policy and in line with the proposed conditions to the draft listed building consent.
12. Comments made at paragraph 4 of the King's Cross Development Forum's response in relation to the Eastern Coal Drops are unclear. The response notes that much of the original brickwork would be removed from the northern half of the Eastern Coal Drop, thereby "*negating a primary reason for the listing of the building*". As detailed in the application documentation, the northern 12 bays of the Eastern Coal Drop viaduct will be cut back to a width of approximately 4 metres as Thames Water requires 24-hour access to the sewer that runs north-south under the viaduct until it turns east under the building towards the Granary building. The King's Cross Development Forum seem to imply extensive brickwork removal, however, that is not correct. The fire damaged northern part of the Eastern Coal Drop and the remaining part of its associated viaduct will be reinstated and refurbished. Brickwork removed from the viaduct will be re-used where possible and existing brickwork will be lightly cleaned in accordance with conservation best practice.
13. The King's Cross Development Forum refer at their paragraph 5 to the inside of the new Upper Level and retail fit out. This is addressed in detail at Section 2.5 of the Design and Access Statement. It is envisaged that we will develop and implement tenant guidelines as elsewhere in the wider King's Cross site to control, for example, signage and elements of the fit out.
14. Finally, the Victorian Society asserts that:

“the overall planning and public benefits submitted are all present in the outline planning permission which saw the Coal Drops refurbished without the addition of an extra level.”

This statement presupposes that the original 2004 scheme would achieve the same (or similar) viable and confident future for these important historic assets; the same distinctive retail offer, same successful and sustainable destination and power of place. We say that's wrong. That is why the new scheme has emerged: to address successfully the physical and economic challenges summarised above with high quality design that both complements and enhances the historic environment and achieves our objectives for Coal Drops Yard:

- breathe new life into the heritage assets, namely the Eastern Coal Drops, the Western Coal Drops and the Western Wharf Road Arches and surrounds;
- significant positive impact on the character and appearance of the conservation area;
- create a unique shopping destination at the heart of King's Cross;
- provide increased circulation and permeability through the CDY site to the surrounding development site;
- the bold re-use of historic buildings combined with contemporary architecture;
- facilitate an inclusive and varied occupier mix within an eclectic 'King's Cross' offer; and
- create a sense of place that people will wish to dwell in as well as shop, adding to and reinforcing the attractiveness of already popular public realm areas such as Granary Square and Lewis Cubitt Square and Park.

The new proposals with their Upper Level achieve these objectives far more successfully than the 2004 outline proposals. The Upper Level and its flagship retail unit is central to the “intensity” of offer, use, footfall and experience that we believe is central to creating a unique shopping destination and sense of place, at the heart of King's Cross: it will be an integral part of the future identity of Coal Drops Yard and its eclectic, distinctive retail offer.

3. Officer's comments on the additional consultation responses.

3.1 The objections largely raise issues which have already been addressed in the Committee Report. The text is intended to address any new matters raised and should be read in conjunction with the officer assessment already published.

Level of Harm

3.2 The Victorian Society expresses the view that the proposal, namely the roof extension, results in substantial harm to the Grade II listed Eastern Coal Drops building (ECD). The Islington Society and King's Cross Development Forum also raise concern in relation to the new roof structure. The heritage significance of the ECD includes the following:

- Architectural interest, which includes the design's elevational composition, structure, materials, plan form and association with the architect Lewis Cubitt.
- Historical interest, which includes its location, original function and later uses, and its specific design as a piece of railway infrastructure demonstrated in the building's layout, size, three level design, enclosure by a roof.
- The group value enhanced by its setting amongst other heritage assets including the listed Granary and gasholders. The principle view of this group is from Granary Square.

3.3 The level of harm to the ECD is considered by Historic England and officers to be 'less than substantial'. However, this harm to the ECD's historic fabric and plan form is a result of changes and interventions not related to the new roof extension. Rather, the harm stems from alterations necessary to convert the building to a viable contemporary and accessible use. The roof extension retains 26 of the 31 existing trusses and integrates a new structure into the ECD. However, this new structural intervention into the existing building is minimal in extent and will be located adjacent to the cross-walls where it there will be minimal visual effect. The harm caused to the historic fabric and layout by the proposed new roof extension is limited, thereby being assessed as less than substantial in accordance with the NPPF.

3.4 The impact of the proposed roof extension on the character and setting of the ECD is considered to be less than substantial. Officers consider that the arched elevations, viaducts and the space between the viaducts contribute more to this part of the Coal Drops' significance than the roof profile. While the proposal changes the form of the northern half of the west facing slope, officers consider that the design retains some of the character to the roof by continuing roof slope over the extension in the same slate finish to the same width. The proposal does not alter the form of the roof on the southern half of the ECD, the element which is most prominent in setting views.

Extent of demolition and alterations to the roof

3.5 The Victorian Society expresses concern over demolition of the existing roof. The proposed roof extension only alters the shape of the inside pitches of the two coal drops. On the ECD, the listed structure, the proposal changes about half the length of the inside slope, amounting to a quarter of its entire roof slopes. However, the extension has been positioned so that its mass mostly sits within the burnt-out section of the ECD which is currently without a roof structure or finish. The ECD has 31 remaining roof trusses with two trusses for each arched bay. The proposal removes 10 of these from the area of roof directly to the south of the burnt section. However 5 of these will be re-used and relocated in the most northern end of the ECD where there roof is proposed to sit in its original form, resulting in an overall loss of only 5 exiting trusses.

Setting of the Coal Drops and the group of listed buildings

- 3.6 The Victorian Society and the King's Cross Development Forum raise concern that the proposed roof would impact on the appearance of the Conservation Area and the setting of the gasholders. The setting of the group of listed heritage assets and the Conservation Area was an important consideration in the development of the design. During its evolution the scale, location and form of the proposal was modified in response to views (Details of the design evolution can be found later in this document.) The extension is placed on the northern section of the ECD where it does not sit forward of the flanking listed structures; the Granary and the Gasholders (please refer to plan on page 291 of the committee agenda). The extension sits on the inside pitches only and slopes inwards, thus further minimising its impact from views including those from Granary Square. The inward sloping form coupled with its curved profile also prevents the gasholders from being significantly obscured (please refer to images on pages 336 and 337 committee agenda). Importantly Gasholder No. 8 is not visible in any views of the CDY owing to the Gasholder Triplets being located between the CDY and Gasholder No. 8.

Sensitive Refurbishment

- 3.7 The Victorian Society comments that both Coal Drops were to be sensitively refurbished as part of the outline planning permission. Officers consider the proposals have been developed with sensitive consideration of the heritage significance of the buildings. New interventions such as shopfronts, bridges, stairs, handrails etc. have been sensitively designed to reduce their visual or physical impact allowing the restored historic fabric to be better revealed.

Western Coal Drops (WCD) Canopy

- 3.8 The Victorian Society and King's Cross Development Forum state that in accordance with the outline permission the canopy should be suitably repaired. They consider that although it is a later addition, it is a distinctive feature which conveys railway use and should be retained. In response to this point officers note that the WCD is not listed. The canopy is a later addition installed 40 year after the construction of WCD, when the building was converted from a coal drop into a warehouse. It is not uncommon for later accretions to be removed from historic buildings as part of refurbishment proposals or as part of a building's historical evolution. Within the canopy, the elements of greatest interest are the decorative brackets. It is proposed that six of these will remain in place (three at each end of the WCD) where they will be most visible. A condition will require any additional salvageable brackets (in a good state of repair) to be relocated within the development where they can be revealed to the public.

Changes from the outline permission and public benefit

- 3.9 The Victorian Society and King's Cross Development Forum comment that the proposal is a departure from the outline permission and now proposes a greater intervention than that previously approved. They state that the public benefits of the proposal are no greater than a proposal which accords with the parameters. Therefore, any additional harm is not justified.
- 3.10 Officers have considered and accepted the applicant's submission that the nature of retail demand has changed over the period between the outline

being granted in 2006 and the current application. The application is supported by a retail assessment which concludes that for small retail units to be successful they require the presence of larger anchor units to which people would specifically visit. In order to ensure the long-term preservation of the buildings, the development must also be economically viable. It is considered that the current proposal is a balanced approach in terms of the level of intervention necessary to ensure the listed building's long term retention, repair and refurbishment also ensuring the continuous use and public access to the historic buildings and historic environment.

Impact on the open space at Yard level

- 3.11 The Victorian Society and Islington Society comment that the proposed roof extension will compromise the open air character of the yard. The King's Cross Development Forum state it would result in a dark open space. Officers do not consider this to be the case. The roof covers only the northern part of yard. Its hour glass shape reduces and narrow joining point which is approximately 6.5 meters wide ensures that the proposal would not impact on the quality of the public realm. Furthermore, the main part of the yard to the south which is wider would be fully open.

4. Additional conditions

- 4.1 The following additional conditions are proposed:
- 4.2 Paragraph 6.2.16 of the Committee Report states that a mechanism was being explored with the applicant to ensure that a proportion of the small units are maintained and not combined to create larger units. The following condition addresses this point.

Condition 14 of application **2015/6016/P** and **Condition 12** of application **2015/6018/P**:

No less than 30 of the proposed retail units shall have a floor area greater than 200sqm GEA of which no less than 10 units shall have a floor area greater than 100sqm GEA.

Reason: To ensure that adequate provision is made for small and independent shops in accordance with policy DP10 of the London Borough of Camden Local Development Framework Development Policies.

The remaining additional conditions seek to address concerns raised by the amenity groups.

Condition 15 of application **2015/6016/P**:

The 5 remaining brackets from the canopy at the Western Coal Drops which are in good condition but not being retained in situ shall be reused where possible elsewhere in the development at public locations agreed in writing by the local planning authority.

Reason: To safeguard the appearance of the premises and the character of the conservation area in accordance with the requirements of policies CS14 of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 and DP25 of the London Borough of Camden Local Development Framework Development Policies.

Condition 4 of application **2015/6016/L**:

Any hidden historic features which are revealed during the course of works, with the exception of notable features identified in the Heritage Statement dated 2015, shall be retained in situ, and any work potentially impacting on such features or their setting shall be suspended and the local planning authority notified immediately. Provision shall be made for their retention or salvage and/or proper recording, as required by the local planning authority, as advised by Historic England.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

Condition 5 of application **2015/6016/L**:

The stability of the structure to remain must be secured, taking into account any rapid release of stress, weather protection, controlled shoring, strutting, stitching, reinforcement, ties or grouting, as may occur to be necessary, throughout the period of those works, where relevant.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

5. Design Development

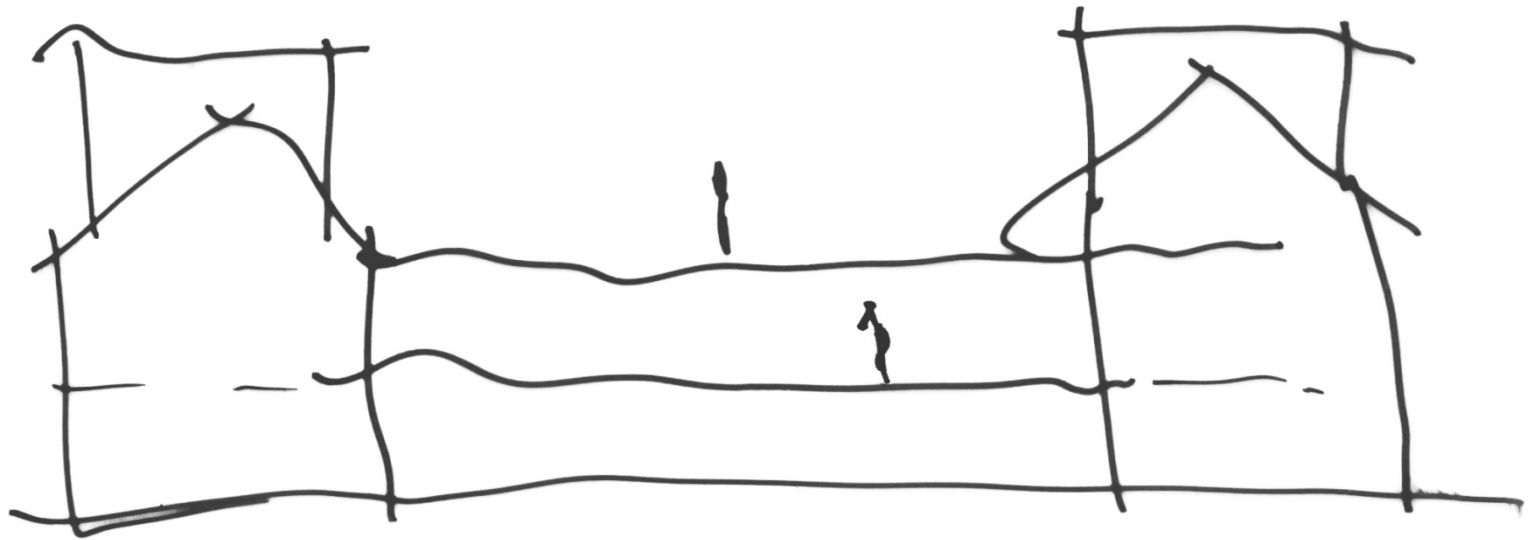
- 5.1 The images on the following pages (entitled 'Coal Drops Yard - Planning Supplementary Information' by Heatherwick Studios) provide some background on the design development of the scheme and provide context of how it has evolved through detailed pre-application discussions with Camden Officers, Historic England and local groups including the King's Cross Development Forum and the Regent's Canal CAAC.

**Coal Drops Yard
Planning Supplementary Information**

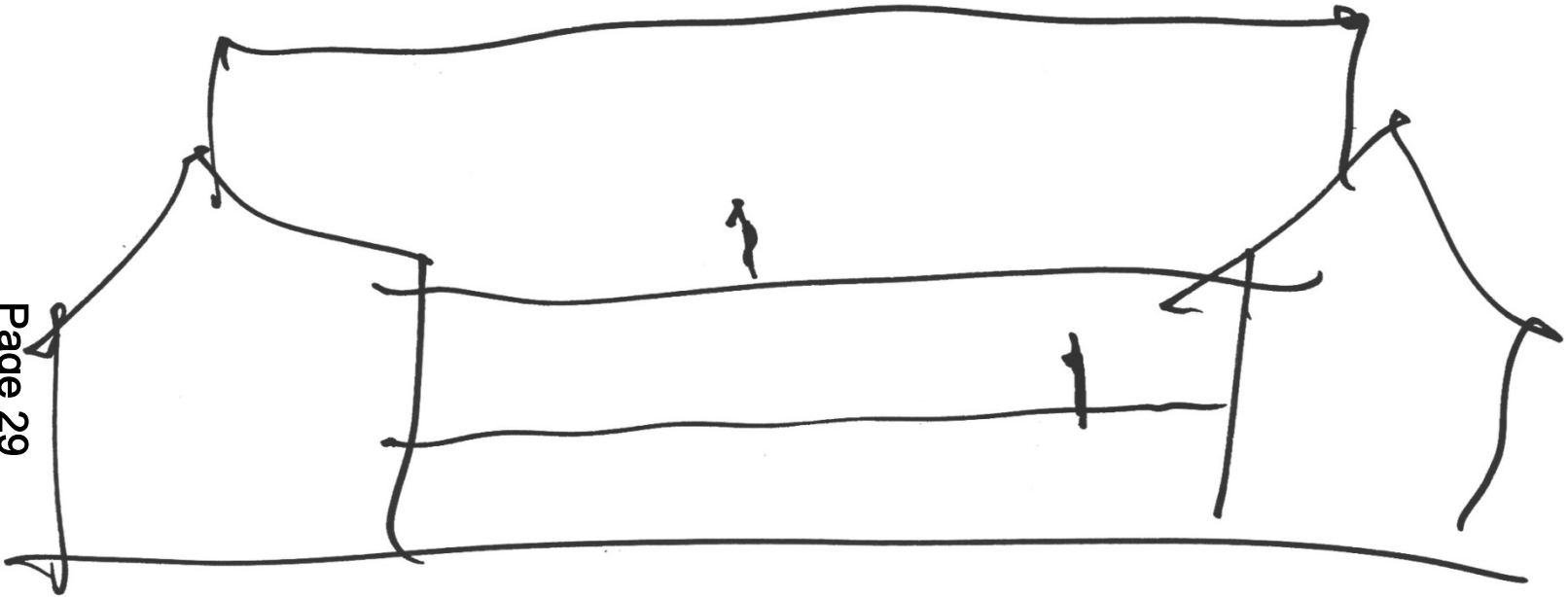
17 December 2015

Heatherwick studio

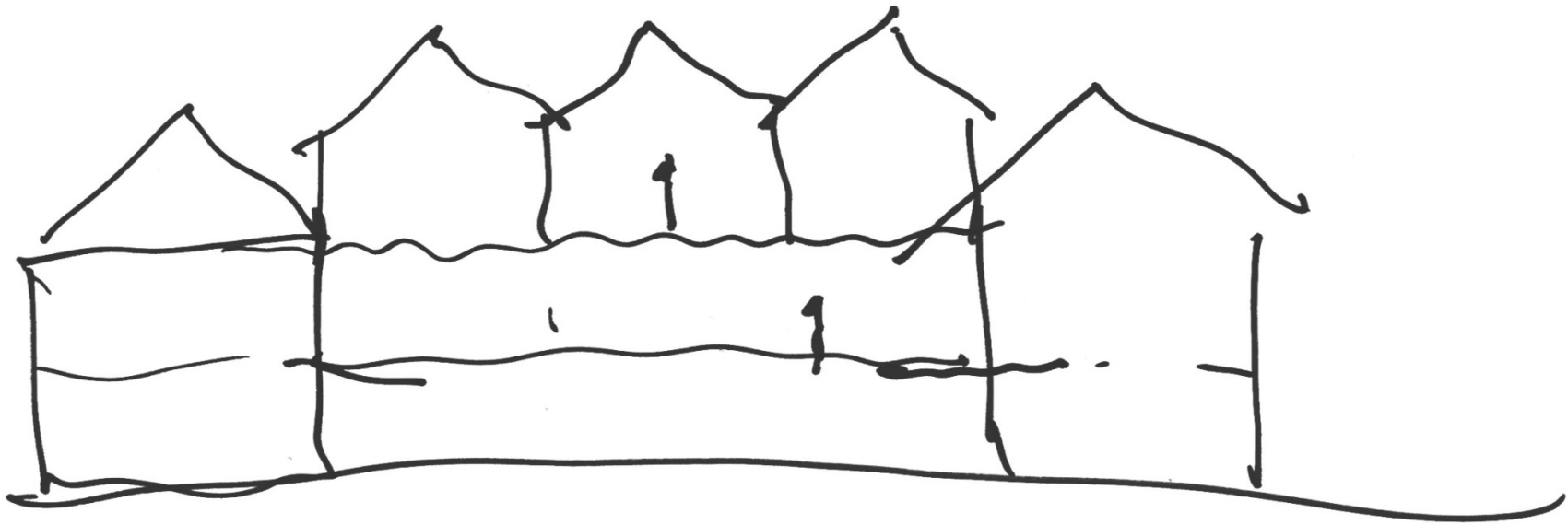




Additional massing above existing buildings

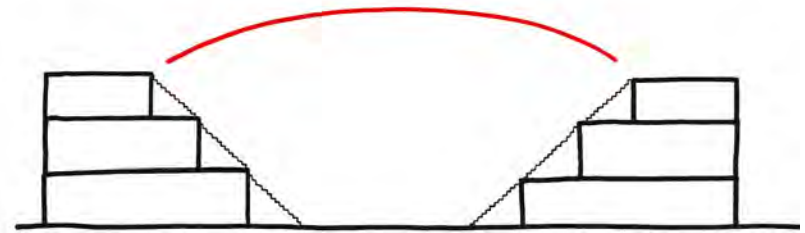


Additional massing between existing buildings

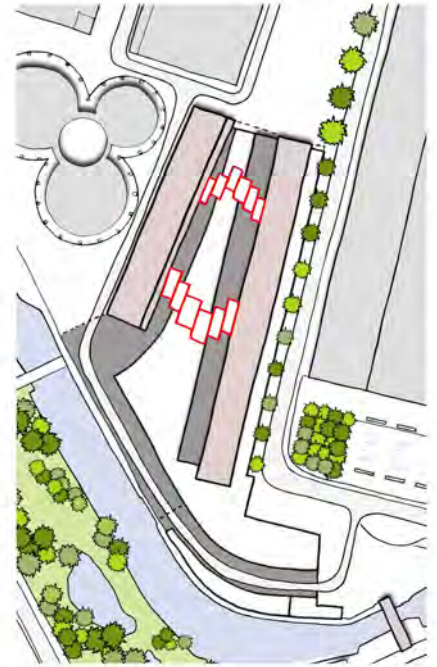
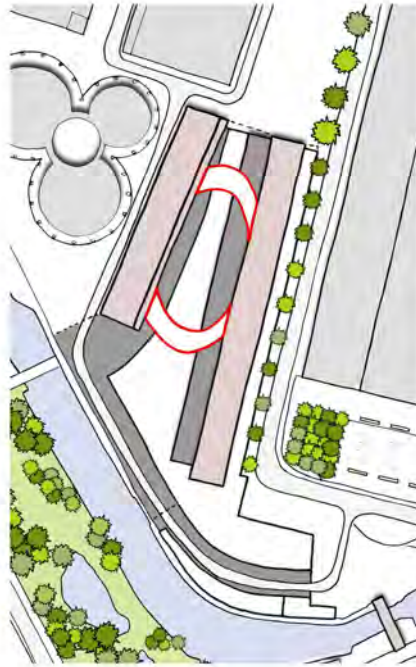
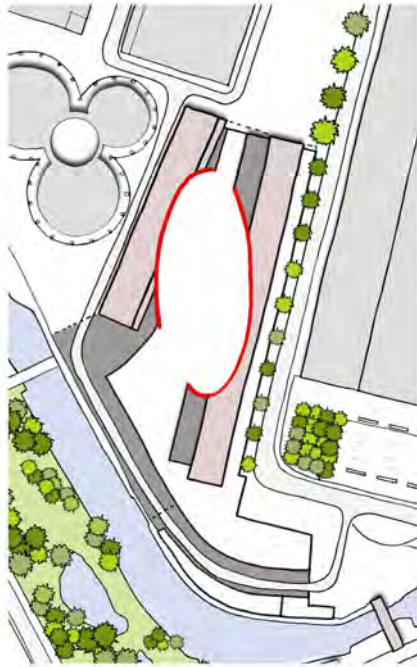
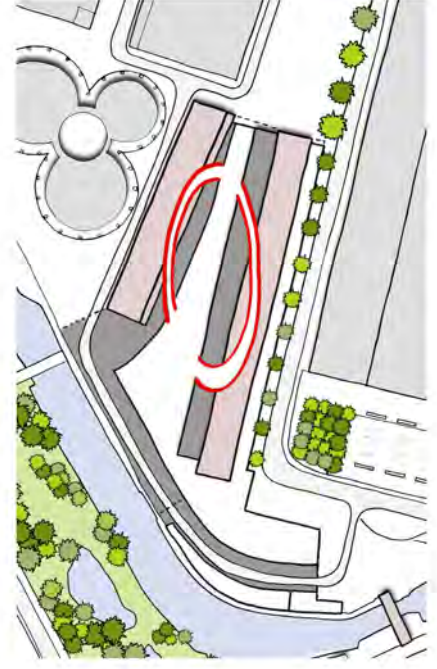
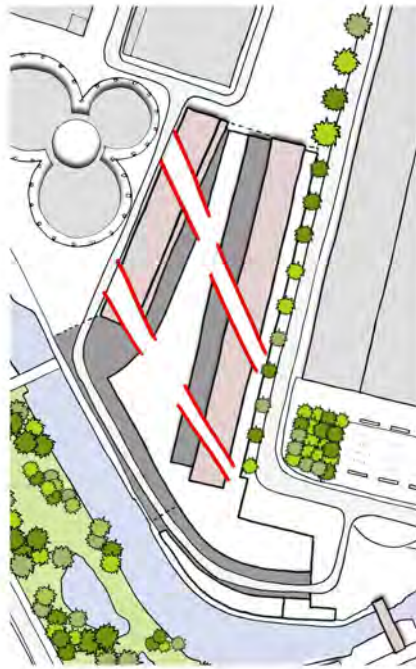
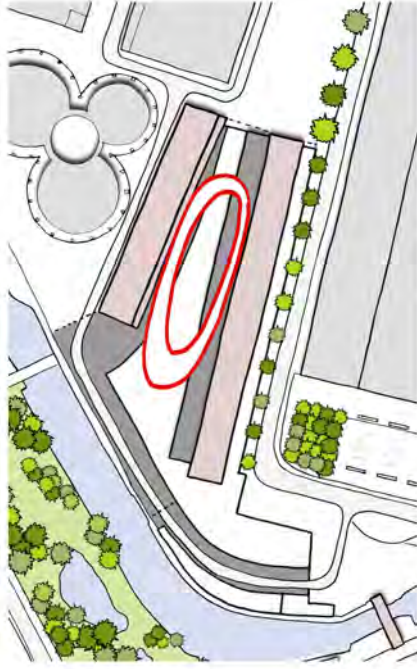


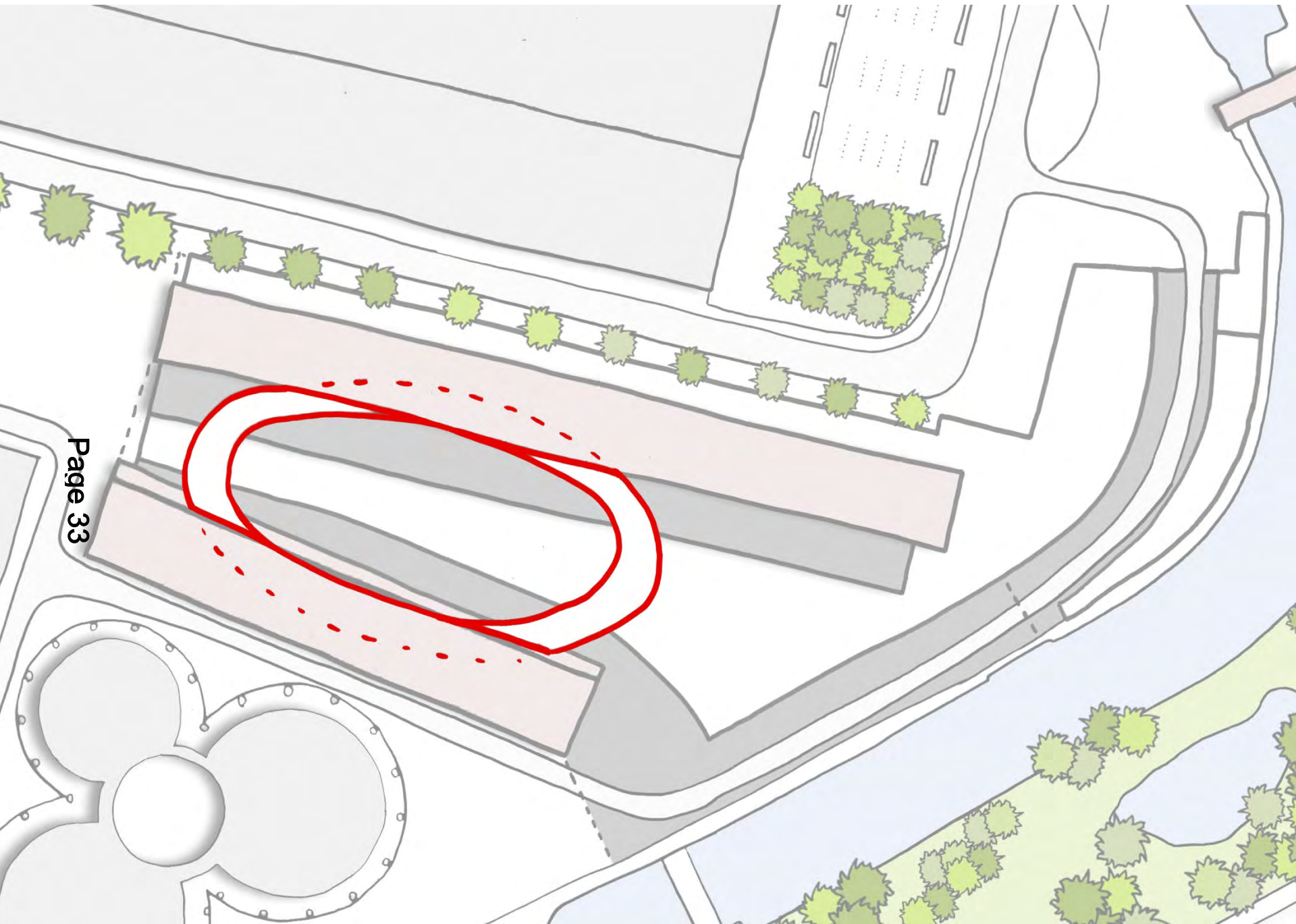
Additional massing between existing buildings

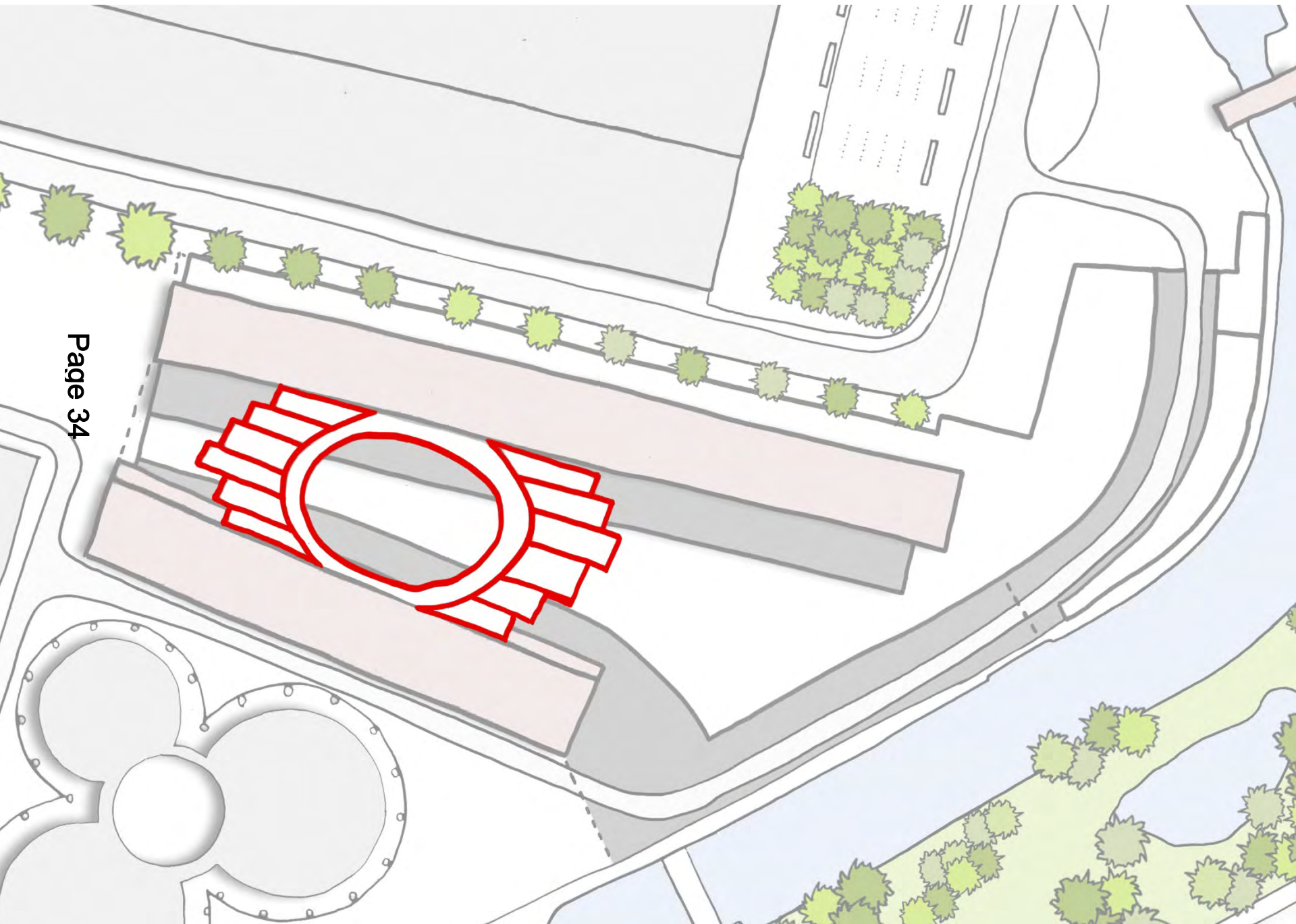
Creating an Additional Level

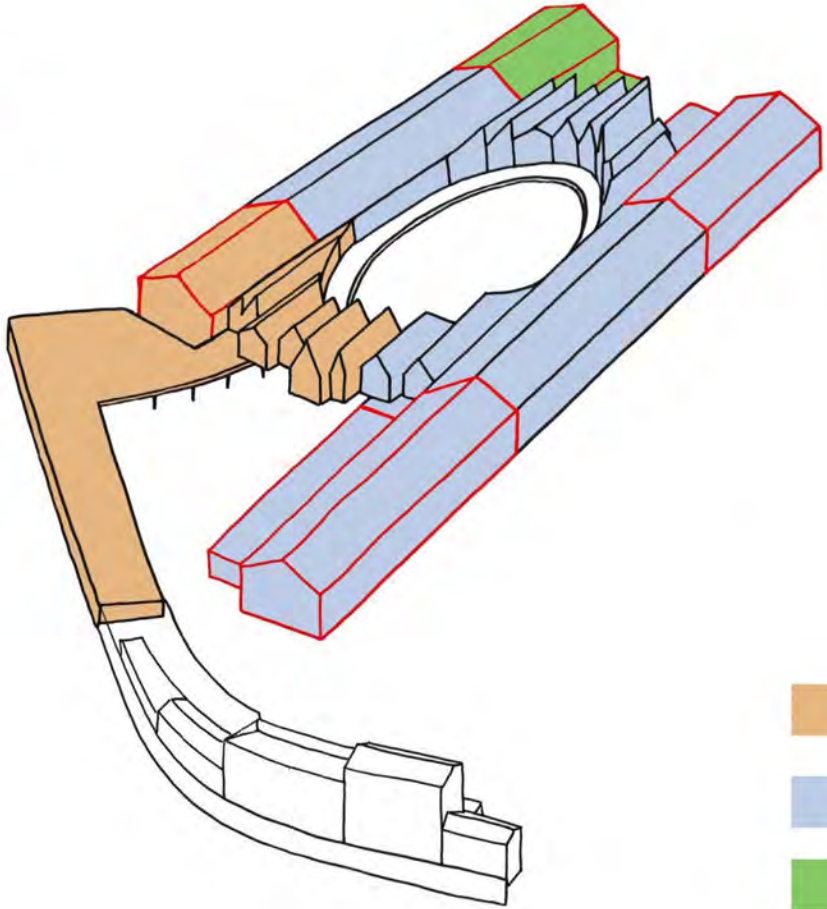
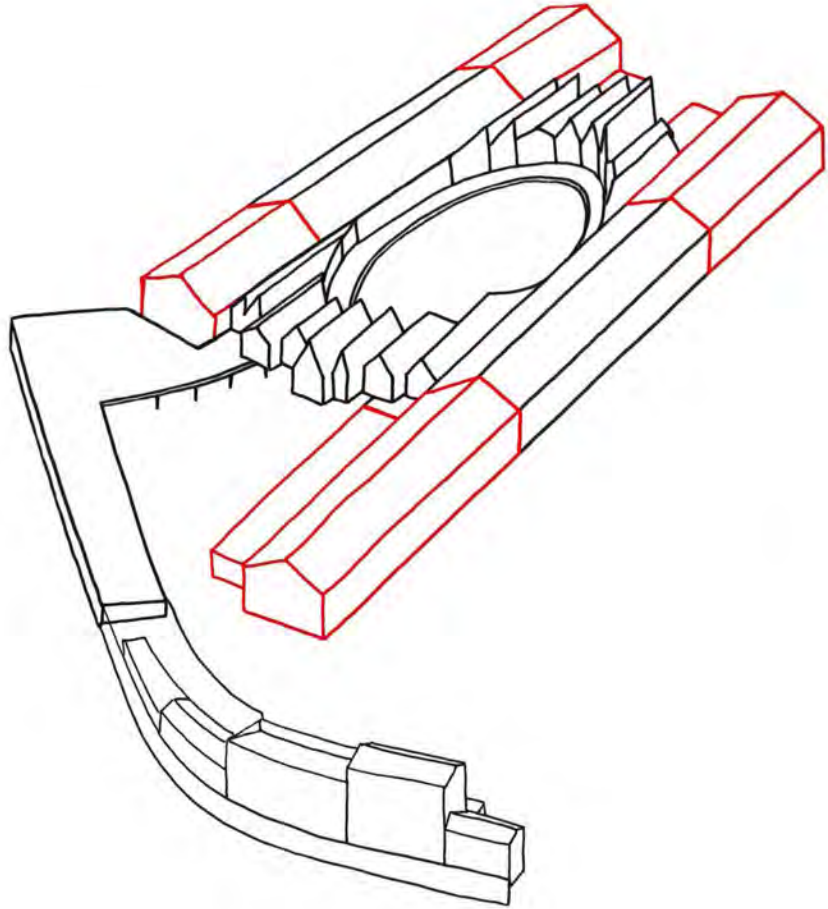


Circulation









- Food
- Retail
- Cinema

