

Listed Building Consent for Alterations, Extension and Realignment of Platforms 0 to 11 on the North Side of the Station Together With Associated Changes to Plant and Equipment to Support Resignalling Works and Installation of New Lock Out Devices at Kings Cross Station, Euston Road, London

Planning and Heritage Statement Incorporating Design and Access Considerations

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Appendix 1 – Historic England Consultation response and minutes of meeting

Appendix 2 – Page 103 of the Heritage Partnership Agreement

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Appendix 4 – Photo of existing 'Throat' area

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INTRODUCTION

- 1.1 This planning statement supports a proposal for listed building consent to extend, realign and alter the northern ends of platforms 0 to 11 and associated changes to equipment as part of a re-signalling scheme along a section of the ECML from Kings Cross Station.
- 1.2 Planning permission is deemed to be granted for the works by virtue of Part 8 of the Town and Country Planning (General Permitted Development) Order 2015.
- 1.3 The statement considers the heritage significance of Kings Cross Station in the context of section 16 of the National Planning Policy Framework (NPPF) which requires that applications describe the significance of any heritage assets affected, including any contribution made by their setting. The NPPF says that the level of detail of reports should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 1.4 Design and access considerations coincide with the heritage issues in this case and are addressed in this report.
- 1.5 The statement is arranged as follows: -
- Section 2 describes the site and surroundings
- Section 3 sets out the background to the development
- Section 4 sets out the details of the proposals
- Section 5 provides an overview of planning policy relevant to the development
- Section 6 reviews the Significance of Kings Cross Station
- Section 7 summarises the pre-application consultation
- Section 8 reviews the proposals in light of planning policy and appraises the proposed development
- Section 9 summarises and concludes the report
- 1.6 The following documentation is also provided to support the application:

Statement of Significance

SITE AND SURROUNDINGS

- 2.1 Kings Cross Station is a grade I listed building and is within Kings Cross Conservation Area.
- 2.2 The focus of this listed building consent application is the re-signalling work within Kings Cross Station at platforms 0 to 11 on the station's northern side. To the north of the platforms is the area known as the 'Throat' which includes all the track and signalling leading into Gasworks tunnel. Gasworks tunnel has three bores two of which are currently in use; the third bore is to be brought into use as part of the project. To the east of the station is York Road, to the west is the construction site for the new Google building; to the south is the main passenger entry points into the station and adjacent underground system.

BACKGROUND

- 3.1 Network Rail are undertaking a re-signalling project that will rationalise the existing life expired signalling system on the approach to London Kings Cross Station and create an interlocking system that will be centrally controlled from York Railway Operating Centre (ROC). (In railway signalling an Interlocking is an arrangement of signal apparatus that prevents conflicting movements through an arrangement of tracks)
- 3.2 The Kings Cross Remodelling project is a once in 40-50-year intervention which will provide modern railway infrastructure into and around the Kings Cross area, increasing resilience and reliability of the rail service and making the terminus fit for high capacity services. The scheme includes:
- Renewal of the existing signal equipment for a less complex, easier to maintain railway resulting in less frequent maintenance interventions, and therefore reducing associated delay minutes.
- Centralisation of signalling systems to the York Rail Operating Centres (ROC).
- Provide a step change in reliability of the railway infrastructure to support the introduction of the "Azuma" class 800/801 IEP trains to East Coast Mainline (ECML) services
- De-conflict the ECML and Thameslink services due to the complexity of train pathing into the Thameslink core via Canal junction
- Boost network capacity along the route to accommodate the rapidly growing passenger numbers, which are expected to increase by 30 per cent by 2023.

3.3 The first double-track Gasworks Tunnel at the northern end of the station was constructed in 1849-51. The second bore, to the east of the first, was constructed in 1876-8. A third bore was added to the west of the first tunnel in 1890-2. The second, easternmost, bore was abandoned in 1977 following electrification of the East Coast Main Line and re-signalling of the remaining two tunnel bores. The current re-signalling proposals will see the eastern bore brought back into use.

3.4 In 2017 Network Rail submitted a screening opinion request to Camden (and Islington) Council it was subsequently confirmed that the re-signalling development did not require an Environmental Impact Assessment.

PROPOSALS

- 4.1 The listed building application is for the following works:
- Alteration, extension and realignment (to varying extents) of existing platforms 0 to 11 to facilitate the realignment of the rail track into the third bore of Gas Works Tunnel and associated re-signalling works including the closure of platform 10.
- Works to signalling gantries, overhead line equipment, lighting, CCTV, and Customer Information systems (CIS) to accommodate the new platform layout.
- New Lock out devices (LOD's) located at the buffer stops of each platform.
- 4.2 The proposed works will support:
- A new standardised track layout in the throat of King's Cross Station which will replace the current life-expired assets.
- The disused east bore of Gasworks Tunnel being reopened and fitted with two new lines
- Replacement of existing interlockings at King's Cross & Holloway with Computer based interlockings from King's Cross Power Signal Box to York ROC.

The proposals are supported by the following drawings:

152319-NWR-DRG-LEP-000100 - Kings Cross Station Existing Site Layout - Platforms Sheet 1 of 2

152319-NWR-DRG-LEP-000101 - Kings Cross Station Proposed Site Layout - Platforms Sheet 1 of 2

152319-NWR-DRG-LEP-000102 - Kings Cross Station Proposed Site Layout - Platforms Sheet 2 of 2

152319-NWR-DRG-LEP-000103 - Kings Cross Station Existing Site Layout - Platforms Sheet 2 of 2

152319-NWR-DRG-LEP-000107 - Kings Cross Station Gantry 249 Existing & Proposed Elevations

152319-NWR-DRG-LEP-000110 - Kings Cross Station Key Layout of Sections

152319-NWR-DRG-LEP-000120 - Kings Cross Station Proposed Arrangement - Elevation and Section - Platform 0&1

152319-NWR-DRG-LEP-000121 - Kings Cross Station Proposed Arrangement - Elevation and Section - Platform 1

152319-NWR-DRG-LEP-000122 - Kings Cross Station Proposed Arrangement Elevation and Section - Platform 2&3

152319-NWR-DRG-LEP-000123 - Kings Cross Station Proposed Arrangement Elevation and Section - Platform 4&5

152319-NWR-DRG-LEP-000124 - Kings Cross Station Proposed Arrangement Elevation and Section - Platform 6&7

152319-NWR-DRG-LEP-000125 - Kings Cross Station Proposed Arrangement Elevation and Section - Platform 8&9

152319-NWR-DRG-LEP-000126 - Kings Cross Station Proposed Arrangement Elevation and Section - Platform 10

152319-NWR-DRG-LEP-000130 - Kings Cross Station Proposed LOD Elevations and Location - Platform 0

152319-NWR-DRG-LEP-000131 - Kings Cross Station Proposed LOD Elevations and Location - Platform 1 & 2

152319-NWR-DRG-LEP-000132 - Kings Cross Station Proposed LOD Elevations and Location - Platform 3 & 4

152319-NWR-DRG-LEP-000133 - Kings Cross Station Proposed LOD Elevations and Location - Platform 5 & 6

152319-NWR-DRG-LEP-000134 - Kings Cross Station Proposed LOD Elevations and Location - Platform 7 & 8

152319-NWR-DRG-LEP-000135 - Kings Cross Station Proposed LOD Elevations and Location - Platform 9

152319-NWR-DRG-LEP-000136 - Kings Cross Station Proposed LOD Elevations and Location - Platform 10

Photomontages showing the existing platform elevations.

PLANNING POLICY

National Planning Policy Framework

5.1 Central government guidance is contained in the National Planning Policy Framework (NPPF, February 2019). Paragraph 8 of the NPPF says planning should contribute to the achievement of sustainable development by balancing its economic, social and environmental roles. Paragraph 11 says that planning decisions should apply a presumption in favour of sustainable development; footnote 6 of paragraph 11 contains restrictions where this presumption in favour of sustainable development does not apply, including designated heritage assets.

5.2 Of particular relevance to this listed building application is Section 16 of the NPPF which requires local planning authorities to take account in determining applications of the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities and the desirability of new development making a positive contribution to local character and distinctiveness. It advises consent to be refused (paragraph 195) where there is substantial harm to a heritage asset unless it can be demonstrated that this is necessary to achieve substantial public benefits or (Paragraph196) where there is less than substantial harm, this be weighed against the public benefits of the proposal.

The Act

5.3 Section 16(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('1990 Act') imposes a statutory duty on local planning authorities, when considering whether to grant listed building consent to have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interests which it possesses. The Courts have held that when a local planning authority finds that a proposed development would harm a heritage asset the authority must give considerable importance and weight to the desirability of avoiding such harm to give effect to its statutory duty under section 16 of the 1990 Act.

Local Plan

5.4 Section 38(6) of the Planning and Compensation Act 2004 requires that determinations be made in accordance with the development plan unless material

considerations indicate otherwise. For Camden the development plan consists of the Camden Local Plan which was adopted on the 3rd July 2017.

5.5 Paragraph 1.34 of the plan sets out strategic objectives which include: creating the conditions for growth, to strengthen Camden's nationally important economy, to promote and support the successful development of growth areas including Kings Cross, to promote sustainable transport for all, to promote and protect the high levels of amenity and quality of life.

5.6 The following specific policies are relevant to the consideration of this listed building application:

- Policy D1 'Design' seeks to secure high quality design including preserving and enhancing the historic environment and heritage assets in accordance with policy D2.
- Policy D2 confirms the position of the NPPF that substantial harm or loss of a
 heritage asset will not be permitted unless it can be demonstrated that substantial public
 benefits outweigh the harm or loss. Similarly, less than substantial harm to the significance
 of heritage assets will not be supported unless the public benefits convincingly outweigh
 that harm. Further policy D2 says that proposals to alter or extend listed buildings will be
 resisted where this would cause harm to the special architectural and historic interest of
 the building.
- Policy T1 seeks to promote sustainable transport by prioritising walking, cycling and public transport.

Other Material Considerations

Conservation Area Statement

The Kings Cross Conservation Area Statement 22 dates to 2004. Since that time there has been many alterations to the station context and the assessment of the conservation area will have changed to some extent. Nevertheless, the statement confirms that the conservation area contains some of the most important historic buildings and structures in the country.

Heritage Partnership Agreement

Camden Council and Network Rail are currently in the process of agreeing a Heritage Partnership Agreement. The purpose of the HPA is to grant listed building consent for specified types of works to King's Cross Station ("The consented Works") subject to conditions and limitations. The HPA is made pursuant to sections 26A and 26B of the planning (Listed Buildings and Conservation Areas) Act 1990 and the planning (Listed Buildings and Conservation Areas) (Heritage Partnership Agreements) Regulations 2014.

Page 40 of the document identifies the extent of the listed building for the purposes of the agreement. This boundary has been used to determine the extent of the listed building for this application submission and in general to advise the project about the extent of the station in determining which works require listed building consent.

STATEMENT OF SIGNIFICANCE

- 6.1 As noted above Kings Cross Station is a Grade I listed building. The list description has not been updated for a considerable time and does not, in my opinion, reflect significance of the structure as it has evolved.
- 6.2 The full detail of the listing is available at the following link https://historicengland.org.uk/listing/the-list/list-entry/1078328
- 6.3 The NPPF annex 2 glossary of terms defines significance (for heritage policy) as 'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance'. Setting of a heritage asset is defined as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'
- 6.4 The document "Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment" sets out the criteria for understanding the heritage value of a place and how to assess heritage significance. The main value criteria set out in the document are evidential, historical, aesthetic and communal. This document is currently under review, the review indicates that the value criteria may be modified.
- 6.5 The NPPF says at paragraph 189 that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 6.6 The Network Rail re-signalling project team employed Arcadis to produce a short report of the main factors which make up the significance of Kings Cross; although the document is relatively condensed it does set out the main significance of the station at a level appropriate the proposed works within the station having regard to the advice in

paragraph 189 of the NPPF. The statement of significance is attached; the main points of the document are:

6.7 Kings Cross Station has historic, archaeological and architectural and artistic interest:

Historic Interest:

- 6.7.1 The station has had a long and varied history from its construction between 1849 to 1852 by the renowned Lewis Cubitt and his nephew Joseph Cubitt. Through the following decades the station has been connected with prominent events and activities such as the arrival or departure of the infamous locomotives of the London and North Eastern Railway, the Mallard and the Flying Scotsman. The station also played a prominent role during both World Wars either by transporting soldiers and equipment to the coast or by aiding in the evacuation of the children of London. This importance is continued today by the station's association with the Royal family or with celebrities all of which are published in tabloids or magazines.
- 6.7.2 In today's climate the historical interest of Kings Cross has expanded to include a new type if interest known as recognition. The station can readily be seen in books, TV productions and films. This has even led to a new tourist attraction being added to the station which has proved to be quite popular. On a personal level those who use the station can have an emotional connection to the building as they depart on holidays, say good bye to loved ones or pass through on their through.

Archaeological Interest:

6.7.3 Although there is a limited potential for archaeological remains on the site of Kings Cross the surrounding area does contain Roman, Medieval and Post Medieval remains. The building itself may contain archaeological interest as with the modifications of the station over time may have masked or covered the original or early phase of the platforms or station.

Architectural and Artistic Interest:

6.7.4 Kings Cross was designed and constructed in the Italianate style that Cubitt idolised, he took his inspiration from the Regency and Renaissance period and from 16th century Italian architecture. This style was traditionally used for domestic dwellings and it is unusual that such a design would have been used on a large public building. From the architecture point of view the station is of national importance and is a prime example of early innovative railway design. The new Western Concourse is in its own right an architectural and artistic marvel. It was designed to be 'spectacular' and would blend with the older parts of the station whilst at the same time being modern and innovative.

6.7.5 The Kings Cross Conservation Plan was produced in 2005 by John McAslan and Partners for Network Rail. This document is obviously before the Kings Cross renovations (possibly to inform proposed works?) but the document holds useful information about the building's significance. Plans within the document identify the level of significance attributed to each area of the station. With the highest significance being attributed to the main train shed where most of the platforms to be altered are located.

CONSULTATION

- 7.1 Network Rail had an initial meeting with Claire Brady of Historic England in December 2017 to discuss in broad terms the proposals for the platforms. Attached as Appendix 1 is a letter from Historic England and a copy of the minutes of the meeting.
- 7.2 A recent short meeting with Antonio Powell confirmed that our approach to the listed building application submission appeared acceptable.
- 7.3 The screening opinion submitted in December 2017 set out the details of the scheme and provided the Council with an early awareness of the need carry out work within the station.

ASSESSMENT

- 8.1 The NPPF classes listed buildings as 'designated heritage assets'. Section 16 advises that planning should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Paragraph 192, in particular, states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.
- 8.2 Paragraph 193 establishes the great weight that should be given to a designated heritage asset's conservation; this is irrespective of whether any potential harm amounts to substantial harm or less than substantial harm to its significance. Section 16 of the Act adds further weight to any harm identified to the listed building.

Alterations to the platforms

8.3 The new track alignment requires alterations and extensions to platforms. The purpose of the alterations and extensions is to reposition and reprofile the platforms so that the

third bore in Gas Works Tunnel can be utilised and to allow increased usable passenger platform area. The area on the layout shown in red represents where change will take place it does not represent the additional length to the existing platform; the layout plan should to be interpreted in conjunction with the proposed elevation for each platform.

- 8.4 The list description does not do justice to the significance of Kings Cross station, the work undertaken in the period running up to the 2012 Olympics in particular the quality of the refurbishment works has supported the significance of the original building and enhanced the great importance of the building in a social context.
- 8.5 The draft Heritage Partnership Agreement (HPA) on page 61 acknowledges that the main train shed is of the highest significance (copy attached as appendix 3). The key indicates that the high significance derives from the primary elevations, important historical or architectural features and historical association. The views through the shed, the large expanse of visible roof structure, the relatively uncluttered platforms, the quality and amount of visible brickwork and the restrained pallet of materials and equipment following the station refurbishment are now part of the engine shed's special architectural and historic interest and visual quality. The proposed works affect the platform ends on the northern side of the station beyond the roof line of the train and suburban train sheds. The existing platform ends sit against the throat area which provides the existing signalling arrangements and OLE supports for trains entering and leaving the station. The platforms are of various lengths, widths and designs. Materials in the risers supporting the platforms are generally modern block material; the ends of the platforms also incorporate the various supporting infrastructure including signage, CCTV, OLE supports and lighting.
- 8.6 The ends of the platform are being re-constructed and adjusted to align with the new track layout. The new platform end elevation will be straight with gate and staircase installed to allow access for railway staff. The design is in line with current standards to provide a higher level of passenger safety. The stairs are easily removable and take up less room than a ramp. A ramp design is not possible on all platforms due to the alignment of the new track layout.
- 8.7 Page 103 of the HPA sets out the existing surfaces within the station. The scheme proposes to retain the materials or where necessary add new materials to match existing. For ease of reference page 103 is attached as appendix 2
- 8.8 The most significant alterations in terms of the sites listed status are the works to platform 0/1 and those to platform 8/9 (which affect historic fabric).

Platform 0/1

Relevant elevation drawing no. 152319 - NMR- DRG- LEP- 000120 Rev. PO2

Relevant elevation drawing no. 152319 - NMR- DRG- LEP- 000121 Rev. PO2

- 8.9 Platform zero was opened in 2010 its initial purpose was to provide capacity to close existing platforms during the major refurbishments which culminated in the improvements completed in 2012. Latterly platform zero has provided increased capacity within the station.
- 8.10 Platform Zero and 1 undergo the most extensive change because the platform adjustment allows for the relocation of the track into the eastern bore of the Gas Works Tunnel. However, platform 0/1 is located at the eastern extremity of the train shed and these platforms less visible in views through the from the south; platform zero is modern construction and of itself has no heritage significance. Platform 1 copers and surfacing will be adjusted so that the platform has a compliant gradient and although this affects a good length of platform which would be evident within the train shed there will be little visual change to the surfacing detail once the scheme is implemented.
- 8.11 Platform 1 requires an area of fencing adjacent to the platform at 1.5 metres high where the platform is not compliant for passenger access to trains.

Platform 8/9

Relevant elevation drawing no. 152319 - NMR- DRG- LEP- 000125 Rev. PO3

- 8.12 The HPA identifies that platform 8 retains an area of stone pavers. The HPA once approved would allow the alteration of platform surfaces without the need for listed building consent with the exception of the stone pavers on platform 8 which cannot be disturbed without the appropriate consent in place.
- 8.11 The track realignment means that the existing stone copers will need to be repositioned to support the new track layout. The cross section shows that an area of block work below the platform will be removed and this will necessitate the repositioning of the stone copers. The stone work can be appropriately identified, numbered and repositioned and we would like to agree a method for ensuring the stone is retained and re-laid in the new modified position as part of the conditions of the permission.
- 8.12 The existing canopy on platform 8/9 will not be affected by the proposed realignment works however Network Rail will be reviewing the canopy alignment following the implementation of the works to platform 9. If alterations are required to the canopy these will be made as part of a separate listed building application.

Lock Out Devices

8.15 The scheme proposes new Lock Out Devices (LOD's) located at the buffer ends of all the platforms in the new layout (the south end of each terminal platform).

8.16 LOD's are new assets which are being added to the station infrastructure as part of this project. They are a piece of safety equipment which allows sections of track (the platforms in this instance) to be 'locked out' (for example to retrieved items dropped on to the track), providing a safety benefit and greater efficiency to operational staff. The LODs are positioned on the platforms so that a person operating the LOD has visibility of the platform track they are locking out (compulsory for safe operation) and are next to the track access ladders for ease of access. The LOD have been sited so that they are in a position of safety, they can be accessed easily and they maintain a safe walking route and a safe distance from the platform running edge for passengers and station staff.

8.17 In most cases the LODs have been placed behind the fencing adjacent to the buffer stops and to one side so that their visibility is minimised.

Gantry and OLE structures

- 8.18 There are a significant number of OLE and signalling structures within the throat area of the station; these structures will be rationalised as part of the scheme and whilst not directly part of this listed building application the existing and proposed views out of the station shed show that the change in signalling layout will be a visual improvement to the setting of the station. (see images attached as appendix 4 and 5).
- 8.19 As part of the existing signalling system a gantry structure (identified as gantry 249 on the drawings) extends over the tracks; the signals are mounted on this platform over the tracks they control. The gantry currently extends from platform zero to platform 9 The resignalling system will require the extension of the gantry structure over the full width of the platforms which will necessitate the extension of the frame to the side of the google building land. In addition the position of some the existing supporting framework will need to be altered to accommodate the new platform layout. The gantry platform will accommodate a different set of signals however as can be seen from the drawings overall the structures height and detailing remain very similar to existing.
- 8.20 There are a further three short sections OLE structures required in the new platform areas to support OLE

CCTV, Speakers and lighting

- 8.21 The submitted drawing show the position of new lighting columns; the spacing and design of the columns reflects the existing arrangement in the station.
- 8.22 CCTV and speaker equipment are currently attached to the lighting columns and this approach to new customer information equipment (CIS) will be carried through into the new platform areas.

8.23 Network Rail consider that the proposed alterations to platforms, associated works to structures and equipment and the location of the LOD's fulfil the requirements of paragraph 192 of the NPPF because the continued improvements to the efficient operation of Kings Cross is fundamental to maintaining the stations viable use. The improvements to reliability and capacity, which will result from the re-signalling scheme, is consistent with the policy requirement to ensure heritage assets contribute to sustainable communities including economic viability. The works only affect in a very minimal way the local character and distinctiveness of the station.

8.24 The statement of significance acknowledges that part of the historic interest of the station derives from its recognition in a social context further, the train shed is acknowledged as being of highest significance in the HPA and areas of historic fabric are located within platform 8 at the northern end. Harm could derive from the change in the operation of the platforms and the changes to the alignment of the stone copers on platform 8. In terms of the identified significance of the station the proposed works are considered to be to less than substantial harm; Paragraph 194 says that any harm or loss of the significance of a designated heritage asset should require clear and convincing justification. Paragraph 196 says that less than substantial harm should be weighed against the public benefits. Similarly, policy D2 of the Camden local plan says, less than substantial harm to the significance of heritage assets will not be supported unless the public benefits convincingly outweigh that harm.

Public benefits

8.25 The following public benefits are considered to outweigh the less than substantial harm identified above:

- A conventional, simplified signalling layout will result in easier maintenance and fewer delays due to signalling failure.
- The rationalisation to the signalling equipment adjacent to the northern end of the engine shed will improve the setting to the listed building
- The track layout changes will improve operational flexibility and increase the capacity of the throat area. (Area between the Gas Work Tunnel and north edge of the station shed). The additional capacity is achieved through the introduction of two new lines into the station through the third bore of Gas Works Tunnel; the ability for trains to speed up quicker when leaving the station and slow down less quickly on the entrance to the station and the capacity for some of the platforms to take 12 carriages instead of the current 10.
- The new layout will benefit passenger through improved reliability of the signalling system and increase train and station capacity.

CONCLUSION

- 9.1The statement of significance acknowledges that 'Kings Cross Station was first and foremost a working railway station and it remains so today. It is also the earliest major station in London still intact (John McAslan and Partners 2015). The station was Grade I listed in June 1954.
- 9.2 Network Rail has considered this submission in light of the current legislative framework and case law. The details of the scheme would not detract from the significance of the station or detract from the structure's special architectural or historic interest. It is considered that the scheme has less than substantial harm to the significance of the listed building and its setting as described in this report and that the less than substantial harm is outweighed by the public benefits of the proposal (that is ease of maintenance of the new signalling system, improvements in the setting of the building to the north, operational flexibility, improved reliability and capacity); even when attaching additional weight to harm as required by section 16 of the Act. Further, subject to appropriate methods for altering the alignment of the stone copings on platform 8, the works will not harm the special architectural or historic interest of the station and therefore the scheme is considered to comply with the requirements of policies (D1 and D2) of Camden's adopted Local Plan.
- 9.3 Network Rail look forward to receiving listed building consent as soon as possible.
- 9.4 Please note that in accordance with advice in the Planning Practice Guide Network Rail would welcome the opportunity to discuss any proposed conditions particularly if any pre-commencement conditions are proposed.

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