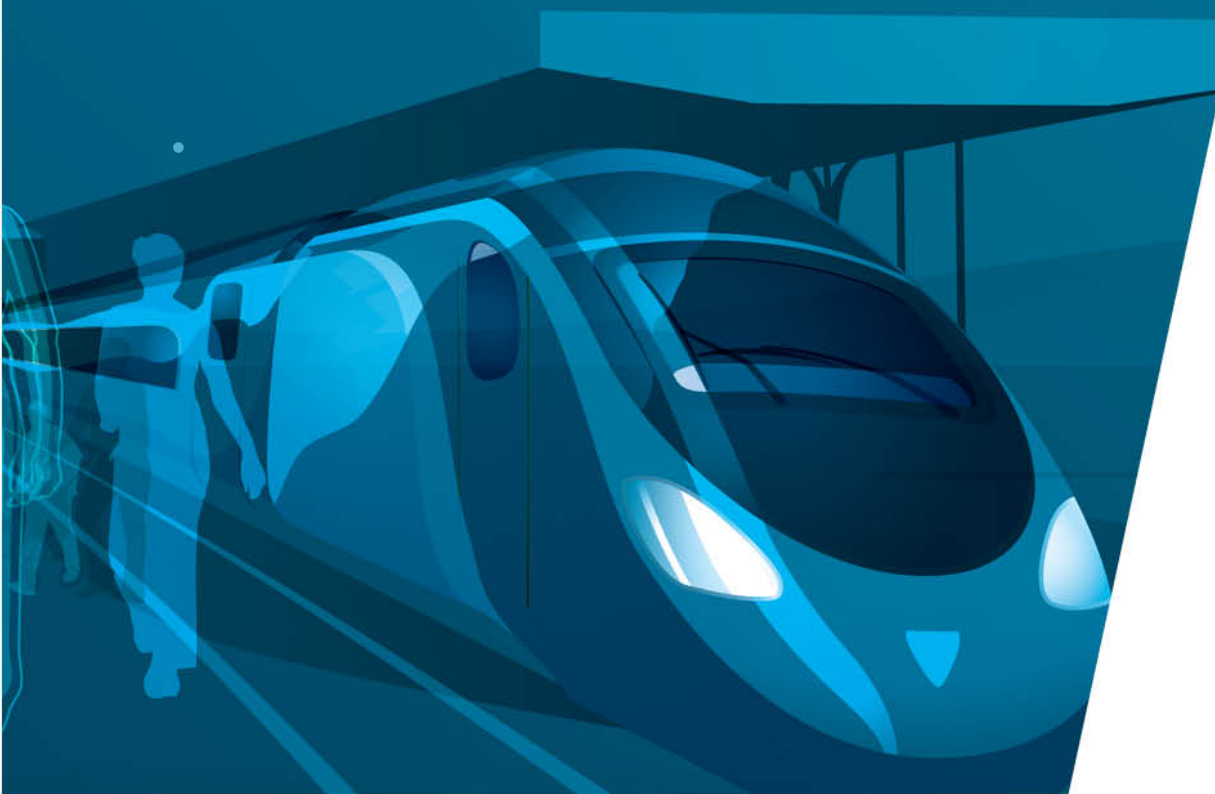


Listed Building Consent for the Erection of New Storage Building (and Removal of Temporary Structures) located between Platform 0 and 1 at Kings Cross Station, Euston Road, London

Planning & Heritage Statement Incorporating Design & Access Considerations

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- **Contents**

- 1.0 Introduction
- 2.0 Site and surroundings
- 3.0 Background
- 4.0 The Proposal
- 5.0 Planning history
- 6.0 Planning policy
- 7.0 Significance of Kings Cross Station
- 8.0 Appraisal
- 9.0 Summary and Conclusions

1.0 Introduction

- 1.1 This Planning Statement supports a proposal for Listed Building Consent erection of a storage building located in an area between platforms 0 and 1 at Kings Cross Station., Euston Road, London. The scheme will also involve the removal of an existing timber storage building (located on platform 0/1) and a container on platform 8, both of which are modern additions.
- 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 (as amended).
- 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 states 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 issues coincide with the heritage issues in this case and are addressed within this report.
- 1.5 The statement is arranged as follows:
 - Section 2 - describes the site and surroundings
 - Section 3 - outlines the background to the proposal
 - Section 4 – describes the proposed development
 - Section 5 – records relevant planning history
 - Section 6 - provides an overview of planning policy, legislation and adopted documents that are considered relevant to the assessment proposal
 - Section 7 – reviews the significance of Kings Cross Station
 - Section 8 - appraises the proposals in light of planning policy
 - Section 8 – summary and conclusions

2.0 Site and Surroundings

2.1 Kings Cross Station is a Grade I Listed Building which is also located within the Kings Cross Conservation Area.

2.2 Network Rail seeks Listed Building Consent for the erection of a new steel storage building located on Platform 1 to the eastern side of the Station. This structure would facilitate the removal of an existing timber structure currently located to the southern end of Platforms 0 & 1 and rationalise storage in the locality (see Figure 1 below).

3.0 Background

3.1 The current structure which provides secure storage for cleaning equipment along with general storage at Platform 1 was originally installed on a temporary basis to be used as storage for ride on cleaning machines. In addition, a steel container is located on platform 8 to provide further storage. However, the appearance of these temporary compounds does not correlate with the overall Kings Cross redevelopment and therefore they need to be replaced by a structure of more suitable material, tying in with the Station's surrounding and historic setting. The structures would be removed upon completion of the new building.



(Figure 1- Photograph of existing store platform 1 to be removed)



(Figure 2- Photograph of existing store platform 8 to be removed)

4.0 The Proposal

4.1 The proposal comprises a single structure containing a secure cleaner's store and general secure storage compound with overall dimensions of 16.5m x 3.5m x 2.5m.

4.2 It is proposed to be erected between platform 0 and platform 1 though the enclosure will be independent of the existing station walls, with 25mm nominal clearance between the face of all new cladding / structure and the existing station structure. This approach provides a 'reversible' construction with no fixings or contact with the listed walls, other than to the platform. The structure could be constructed and subsequently removed without any permanent impact on the existing station structure above platform level.

4.3 The structure comprises a steel frame which will be clad and roofed with a galvanised steel, diamond pattern mesh grating to be set vertically to the walls, enabling sighting through the enclosure. The store would provide storage for up to 4no. ride on floor cleaners and create a secure area for recharging and would require steel floor plates to be provided at parking positions to prevent machines sinking into the platform surface when parked.

The proposal is supported by the following drawings:

Location Plan

Drawing 016-96-SO-XX-ZZ-DR-S-0001 Rev P03 Existing General Arrangement

Drawing 016-96-SO-XX-ZZ-DR-S-0002 Rev P01 Structural Principles

Drawing 016-96-SO-XX-ZZ-DR-S-0003 Rev P02 Proposed General Arrangement - Platform Level

Drawing 016-96-SO-XX-ZZ-DR-S-0004 Rev P01 Proposed General Arrangement - Roof
Drawing 016-96-SO-XX-ZZ-DR-S-0005 Rev P01 Proposed Structural Elevations
Drawing 016-96-SO-XX-ZZ-DR-S-0006 Rev P01 Details & Sections
Drawing 016-96-SO-XX-ZZ-DR-S-0007 Rev P01 Proposed Elevations

5.0 Planning History

The applications considered most relevant to this site are as follows:

- 2006/3394/L: Alterations, extensions, refurbishment works to King's Cross Station including construction of Western Concourse to abut western range and the Great Northern Hotel; alterations, refurbishment and structural upgrading of the Western Range including reinstatement of bomb gap facade; construction of platform Y with installation of associated catenaries; demolition and replacement of Handyside footbridge; refurbishment of original booking hall; construction of canopies to south elevation of main train shed and taxi waiting areas; construction of enclosure to London Underground southeast stairs; alterations to platforms 1 and 5-8; demolition of southern end of suburban train shed and adjoining canopy; demolition of engineer's bothy building and major portion of cab road to York Way and related walls and structures; permanent removal of Great Northern Hotel porch, railings and flagpole and porte cochere and northern canopy to mainline station western range; various demolitions in the western range from basement to 3rd floor levels and roof of former booking office; and other alterations, operations and extensions in connection with the provision of new passenger and operational facilities. Listed Building Consent granted 9 November 2007.
- 2006/3387/P: Alterations, refurbishment and extensions to King's Cross Station to provide for new operational railway purposes and passenger facilities, including construction of Western Concourse (to include ticketing, retail {Class A1}, food and drink facilities {Class A3/A4/A5} and ancillary office accommodation and integrated access facilities to London Underground Northern Ticket hall), demolition of southern concourse and landscaping of new southern square; alterations to Western Range; construction of platform Y and alterations to platforms 1 and 5-8; construction of canopies to south elevation of main train shed and taxi waiting areas; enclosure of London Underground South-East stairs; permanent removal of Porte Cochere and northern canopy to Western Range, Great Northern Hotel porch and other items; demolition and replacement of Handyside pedestrian footbridge and demolition of elements of suburban train shed and of other structures; and other alterations, operations and extensions in connection with new uses and facilities. Full Planning Permission approved 9 November 2007

Pre-application advice

It is understood that a pre-application discussion took place in 2017 regarding the proposed facility between Network Rail, Camden Council and Historic England, to which no objections were raised in principle. However, in determining the design of the structure Network Rail was asked to consider:

- The size of the compound, specifically how far it extends onto the platform.
- The construction materials, in particular that the fabric was made from a modern material. It was advised that brick would not be appropriate and that there was a preference for a modern, metal covering, similar the metal grating use elsewhere on the station.

6.0 Planning Policy, Legislation & Adopted Guidance

The Act

6.1 Determination of this application is to be made under section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. National planning guidance contained in the National Planning Policy Framework (NPPF) confirms in Paragraph 2 that the NPPF must be considered in preparing the development plan and is a material consideration in planning decisions.

National Planning Policy Framework

6.2 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.

6.3 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 (Paragraph 196) where there is less than substantial harm, this be weighed against the public benefits of the proposal.

Local Plan

6.4 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.

6.5 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.

6.6 The following 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.

Other Material Considerations

Conservation Area Statement

The Kings Cross Conservation Area Statement 22 was adopted in December 2003. 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

A Heritage Partnership Agreement was completed in May 2019 between Camden Council and Network Rail. The HPA grants 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. Pages 40 and 41 of the document identify 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.

7.0 Assessment of Significance

7.1 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 Network Rail's opinion, reflect significance of the structure as it has evolved

7.2 The full detail of the listing is available at the following link-
<https://historicengland.org.uk/listing/the-list/list-entry/1078328>

7.3 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*’. The ‘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.*’

7.4 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.

7.5 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.

7.6 In 2019 Network Rail 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 to the current proposal, having regard to the advice in paragraph 189 of the NPPF. The main points of the document are:

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

Historic Interest:

7.8 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.

7.9 In today’s climate the historical interest of Kings Cross has expanded to include a new type of 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:

7.10 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:

7.11 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.

7.12 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.

8.0 Appraisal

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 (i) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; (ii) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and (iii) 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.

8.3 The Heritage Partnership Agreement (HPA) acknowledges that the volume of the main train shed is of the highest significance. Drawing No. 2 (page 57) indicates that the high significance derives from the primary elevations, important historical or architectural features and historical association. More specifically, the views through the shed, the large expanse of visible roof structure, 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.

Appearance

The design philosophy for the new compound is to provide a modern functional structure of the minimum size required for operational requirements, which has been designed following the advice of Historic England and working within the parameters of the HPA. The intent is to provide a carefully designed and functional enclosure, and to purposefully avoid a pastiche of the original station architecture and/or fabric. It is considered that the simple, open steel mesh design would have a limited visual impact on the open character and views through the main train shed, and would ensure that a limited amount of historic brickwork would be obscured. In addition, it is considered that the structure has a functional appearance and would be read in the context of other modern railway infrastructure in the vicinity, e.g. Overhead Line Equipment, signals and signage.

Position

Whilst it is acknowledged that the proposal would interface with the arches along Platform 0/1 this location was guided by its least intrusive position and impact on passenger flows, utilising and infilling the existing liner pattern of the built form. The position is also determined by available platform widths and the ability to leave sufficient clearance to the platform edges, particularly at the narrower Platform 0. As outlined previously, the works are fully reversible, being independent of the existing station walls, with 25mm clearance between the face of all new cladding / structure and the existing station structure. No fixings or contact with the listed walls, other than to the platform are required. Notwithstanding this, it should be noted that platforms 0/ 1 are located at the eastern extremity of the train shed with these platforms having less visible views through the from the south. In addition, platform zero is of modern construction with minimal heritage significance with the HPA advising (see Drawing No, D2) that there is little surviving historic fabric on the platforms within the station. On this basis it is considered that the proposal could be constructed (and subsequently removed in future) without any permanent impact on the existing station structure.

It is noted that one of the key aims of the HPA is to avoid the build up of clutter within the Main Train Shed and concourse which are identified as being susceptible to proliferation of signage and advertising. In this case the proposal would not require the addition of any commercial signage and above all, would seek to achieve the aim of reducing concourse clutter by removing two existing storage buildings.

8.4 Network Rail consider that the proposal would fulfil the requirements of paragraph 192 of the NPPF by enabling the rationalisation of platform storage within the Main Train Shed, improving the visual quality of the locality and therefore making a positive contribution to the heritage asset. In addition it is considered that the proposal would have a negligible impact on the local character and distinctiveness of the station.

8.5 In conclusion and within the context of the identified significance of the station, the proposed works are considered to cause less than substantial harm. Paragraph 194 states 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.

8.6 As outlined above, this is an essential facility and a carefully considered design solution to provide secure storage and enable the removal of visually harmful buildings elsewhere within the station. Network Rail regards safety as a key priority and therefore this facility is required to provide a secure area for the storage of cleaning materials and valuable machinery away from public areas, removing the risk of misuse and potential damage. It is considered that the proposal aligns with Network Rail's Putting Passengers First initiative, creating a safe and pleasant environment for passengers and staff, and that the proposal strikes a positive balance between functional need and the preservation of this significant heritage asset.

9.0 Summary and Conclusions

9.1 The 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 benefits of the proposal as outlined in detail above, even when attaching additional weight to harm as required by section 16 of the Act. Further the scheme is also considered to comply with the requirements of policies (D1 and D2) of Camden's adopted Local Plan.

9.3 We are therefore hopeful of receiving a positive decision in due course and in accordance with advice in the National Planning Policy Framework, Network Rail would welcome the opportunity to work with Camden Council to address any issues which may arise. In addition, we would welcome the chance to discuss any likely pre-commencement planning conditions as this is a time critical scheme programmed to coincide with the planned closure of Platform 0 in June 2020.

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Network Rail

The Network Rail logo, featuring the text "NetworkRail" in a bold, blue, sans-serif font. To the right of the text is a stylized graphic consisting of several overlapping, triangular shapes in shades of red, orange, and yellow, creating a sense of motion or a signal.

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