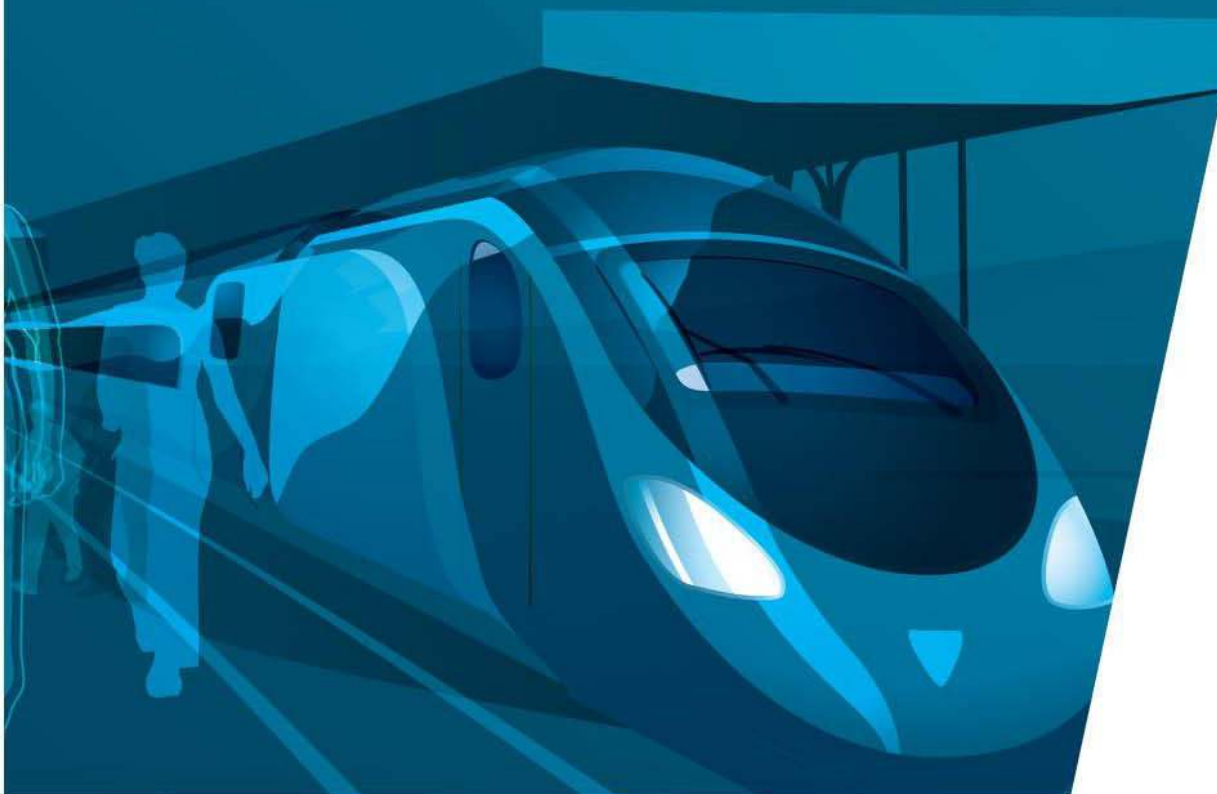


*Listed Building Consent for Alterations to Platforms 8  
& 9 on the North Side of the Station (amendments to  
approved application 2019/2626/L) at Kings Cross  
Station, Euston Road, London*

*Planning and Heritage Statement including  
Design and Access considerations*

Document Reference: TP/LNE/2020 - 098

Date: November 2020



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## **Appendices**

Appendix 1 – Page 103 of the Heritage Partnership Agreement

Appendix 2 - Page 61 of the Heritage Partnership Agreement

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## INTRODUCTION

1.1 This planning statement supports a proposal for listed building consent for alterations specifically to platforms 8 and 9 on the north side of Kings Cross Station. Listed Building Consent was originally granted for works to extend, realign and alter the northern ends of platforms 0 to 11 as part of a re-signalling scheme along a section of the ECML from Kings Cross Station (application 2019/2626/L granted 11<sup>th</sup> September 2019). It has since been established that longer sections of platforms 8 and 9 are non-compliant and are required to be brought up to standard. Therefore further amendments to platforms 8 and 9 are now required which fall beyond of the scope of the original consent.

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

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## **SITE AND SURROUNDINGS**

2.1 Kings Cross Station is a grade I listed building and is located within Kings Cross Conservation Area.

2.2 The focus of this listed building consent application relates to further amendments to platforms 8 and 9 which fall out of the scope of the original listed building consent. The amendments form part of the wider re-signaling project at Kings Cross. 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 is 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 overall 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.

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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 This listed building application relates to alterations to Platforms 8 & 9 on the North Side of the Station (amendments to approved application 2019/2626/L)

The proposals are supported by the following drawings:

*\*For information only\** 152319-NWR-DRG-LEP-200102 Rev P01.1 Proposed Site Layout Track and Platforms GRIP4/GRIP5 Works Area Comparison

152319-MOS-DRG-ECV-070024 Rev C01- Kings Cross Station Platform Extension and Modification Existing Platform 8 Demolition Plan (Surface)

152319-MOS-DRG-ECV-070023 Rev C01- Kings Cross Station Platform Extension and Modification Existing Platforms 8/9 Demolition Plan (Sub Surface)

152319-MOS-DRG-ECV-070050 Rev C01- Kings Cross Station Platform Extension and Modification Existing Platforms 8/9 Demolition Sections Sheet 1

152319-MOS-DRG-ECV-070051 Rev C01- Kings Cross Station Platform Extension and Modification Existing Platforms 8/9 Demolition Sections Sheet 2

152319-MOS-DRG-ECV-070105 Rev C01- Kings Cross Station Platform Extension and Modification Proposed General Arrangement Platform 8/9

152319-MOS-DRG-ECV-070250 Rev C01- Kings Cross Station Platform Extension and Modification Proposed Section A-A, B-B & C-C Platform 8/9

152319-MOS-DRG-ECV-070251 Rev C01- Kings Cross Station Platform Extension and Modification Proposed Section D-D, E-E, F-F & G-G Platform 8/9

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## **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 (Paragraph 196) 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:

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- 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**

5.7 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**

5.8 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.

5.9 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. The document also identifies areas considered to be of high significance.

## **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 our 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.

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 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 journey.



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### **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 held a recent meeting with Antonia Powell (Camden Council) and it was confirmed that listed building consent would be required for the further alterations to platforms 8 and 9.

## **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.

## Background to Platform Alterations

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 majority of works to platforms 8 and 9 were approved under application 2019/2626/L. Attached for information, drawing 152319-NWR-DRG-LEP-200102 shows the extent of additional works required mainly to the platform copers. For ease, an extract of this drawing is shown in Figure 1 below. The works within the area shaded purple (beneath the red) to the north of the platform were previously approved and areas shaded yellow are to indicate areas of high significance as identified under the HPA. The additional works proposed are shown in red and include a slightly enlarged area beneath the canopy and copers works along the edges of platforms 8 and 9. Within the train shed the front wall will remain in situ between chainage 220.00m and 263.00m with only the copers being cut back.

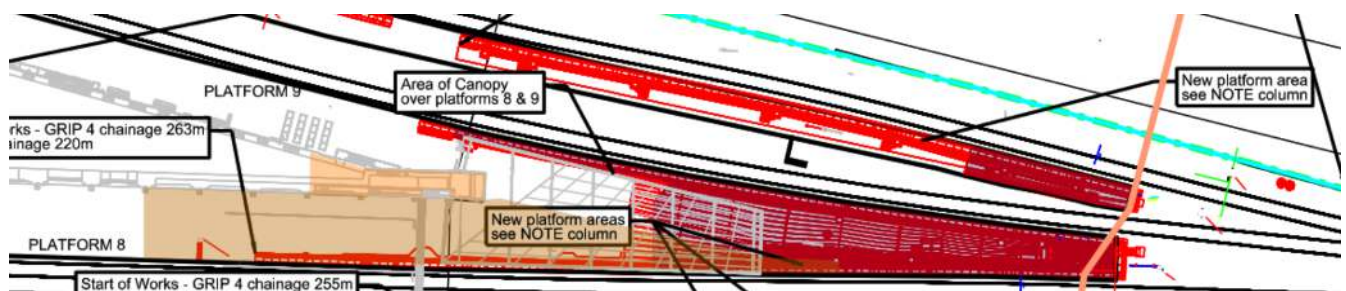


Figure 1- Extract of drawing 152319-NWR-DRG-LEP-200102 Rev P01.1

## Platform 8/9

8.4 The HPA (page 61) acknowledges that the main train shed is of the highest significance (copy attached as appendix 2). 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 shed's special architectural and historic interest and visual quality.

8.5 The HPA identifies that platform 8 retains an area of stone pavers. Whilst the HPA allows the alteration of platform surfaces without the need for listed building consent, this provision does not apply to platform 8 given the presence of such historic fabric. No further demolition is required within the train shed area with works limited to copers cut back and re-surfacing only. It is acknowledged that any York stone will need to be carefully located and possibly repositioned. We understand that a screed currently separates the stone and platform

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surface and therefore a method statement is being developed to ensure works in this area are carried out in a sensitive manner. As previously approved, cross sections for work to be carried out beyond the train shed to the north show that an area of block work below the platform will be removed and this will possibly necessitate the repositioning of the stone copers which again can be dealt with via the detailed method statement in line with condition 5 of the original LBC.

8.6 The existing canopy on platform 8/9 will be retained in its entirety and during construction works will be propped along its centre line and the columns wrapped in protective correx sheets to protect the paint from any damage.

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 1.

8.8 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. We acknowledge that 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, however the additional coper works to Platforms 8 and 9 are considered relatively minor in the context of the site as a whole. 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**

8.9 The following overall 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.

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- The new layout will benefit passenger through improved reliability of the signalling system and increase train and station capacity.

## CONCLUSION

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 proposed amendment, in the context of the wider scheme and Station, 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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