

27 August 2021
Listed Building Consent covering letter



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Dear Sir/Madam

Application for Listed Building Consent

The Lighthouse Block, 283-297 Pentonville Road and 370-380 Grays Inn Road, London N1; and, 1-5 Kings Cross Bridge, 281 Pentonville Road and 368 Grays Inn Road, London, N1 9NW

Planning Portal Reference: PP-10159060

On behalf of the applicant, UK Real Estate Limited, we write to submit an application at the above Site for Listed building Consent for the following:

'Listed building Consent for internal changes to interconnect Lighthouse building and Kings Cross Bridge building at ground, first and second floor levels.'

In support of this application, in addition to this Planning, Design and Access statement, the following documents and reports are submitted:

- Completed Application Forms and necessary certificates;
- Site and location Plan;
- 1209_Lighthouse & KXB connection DAS prepared by Latitude;
- Existing and proposed drawings prepared by Latitude;
- Heritage Statement prepared by Savills.

No external works are proposed and as such planning permission is not required for this works. However, the Lighthouse is listed and as such listed building consent is being sought.

As the application is for Listed Building Consent only, no fee is required.

1. Site and Surroundings

The application Site comprises two adjacent buildings, located in the Kings Cross area of London. Both properties are owned by the Applicant.

The buildings are situated on a prominent site, which stands at the convergence of a number of major routes; Euston Road, Pentonville Road and Grays Inn Road, and stretches to Kings Cross Bridge which closes off the triangular 'island' area.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Kings Cross Railway Station is located within 50 metres to the north west, and the Site is situated above the former Metropolitan line platforms which sit below street level and Kings Cross Bridge.

The two buildings comprise:

- 283-297 Pentonville Road and 370-380 Grays Inn Road, London N1 subsequently entitled 'The Lighthouse Block' - 378 AND 380, GRAYS INN ROAD, 295 AND 297, PENTONVILLE ROAD is a Grade II listed premises (list entry [1113191](#)), whose significance as a listed building principally relates to the design of exterior features including the façade and a prominent for its 'lighthouse' structure at roof level. It is a building of good Victorian architectural design, and is considered an important local landmark.
- 1-5 Kings Cross Bridge, 281 Pentonville Road and 368 Grays Inn Road, London, N1 9NW subsequently entitles 'Kings Cross Bridge', is located to the rear of the lighthouse building. The building has a contemporary, largely glazed design. The building is a modern contrast to the lighthouse building, whereby the building lines are clearly defined through the stark change of the older vs newer materials utilised.

Both Buildings have an established office use on upper floors, and retail/restaurant uses at ground floor levels. The buildings therefore have a number of access points off the surrounding roadways and pavements.

The Site is located within the Kings Cross/St Pancras Conservation Area.

The Site is not subject to environmental statutory designations.

2. Planning History

We have undertaken a review of the available online planning records and note the following considered relevant at this address:

Reference	Description	Decision
2019/5116/P	1-5 King's Cross Bridge: Minor alterations to Grays Inn Road and Pentonville Road elevations to three storey building comprising retail/restaurant (Class A1/A3) at ground floor and office (Class B1a) at first and second floors and roof top plant, following demolition of existing building approved under planning permission ref: 2017/1206/P dated 15.08.2017.	GRANT 18 March 2020
2017/1206/P	1-5 King's Cross Bridge: Variation of Condition 2 (approved plans) of planning permission reference: 2014/0371/P dated 26/08/2014 (for the erection of a three storey building comprising retail/restaurant (Class A1/A3) at ground floor and office (Class B1a) at first and second floors and roof top plant, following demolition of existing building) to amend the access from street to basement levels; raise the ground floor slab to allow access to underground tunnels; provision of basement services (cycle/refuse storage); alterations to upper floor layout; infill of approved void between first and second floor levels; provision of a full length facade to the ground floor elevation facing Kings Cross Bridge; revised materials for office entrance on Grays Inn Road and an increase in the height of approved plant screen, and Variation of Condition 3 (method statement) to allow some above ground development to commence prior to the submission/approval of the method statement for development proposed below ground level.	GRANT 15 August 2017
2014/0371/P	1-5 King's Cross Bridge: Erection of a three storey building comprising retail/restaurant (Class A1/A3) at ground floor and office (Class B1a) at first and second floors and roof top plant, following demolition of existing building	GRANT 26 August 2014

2011/5463/L	The Lighthouse: Revisions to listed building consent ref: 2008/5366/L granted 8 April 2009 including internal and external alterations associated with the relocation of the secondary escape stair and refuse/recycling store from Grays Inn Road to Pentonville Road; relocation of the entrance to retail unit 1 towards the apex of the building; alterations to roof finish, raised parapet to 283 Pentonville Road; installation of timber double glazed sash windows and alterations to basement layout and cycle storage.	GRANT 21 December 2011
2008/5366/L	The Lighthouse: Listed Building Consent - Works associated with the demolition of existing ground plus three storey building with retention and refurbishment of the facades and "lighthouse" structure at 285-297 Pentonville Road and 372-380 Gray's Inn Road; erection of a 5-storey building, partly behind retained facades, to provide either retail or restaurant uses (Class A1 or A3) at ground floor level, supporting services located at basement level, and Class B1 offices on the 1st- 5th floors; creation of retail 'kiosk' units at ground floor of 283 Pentonville Road and 370 Gray's Inn Road; rebuilding and alterations to 283 Pentonville Road and 370 Grays Inn Road and the replacement of all shopfronts at ground floor level.	GRANT 7 April 2009
2008/5358/P	The Lighthouse: Full Planning Permission - Demolition of existing ground plus three storey building with retention and refurbishment of the facades and "lighthouse" structure at 285-297 Pentonville Road and 372-380 Gray's Inn Road; erection of a 5-storey building, partly behind retained facades, to provide either retail or restaurant uses (Class A1 or A3) at ground floor level, supporting services located at basement level, and Class B1 offices on the 1st- 5th floors; creation of retail 'kiosk' units at ground floor of 283 Pentonville Road and 370 Gray's Inn Road; rebuilding and alterations to 283 Pentonville Road and 370 Grays Inn Road and the replacement of all shopfronts at ground floor level.	GRANT 8 April 2009

The above planning history identifies the refurbishment and development that has occurred on the Site in recent years. Since this refurbishment and refurbishment which has taken place of the Lighthouse block and the Kings Cross bridge site, since 2016 and 2020 respectively, the buildings have had lawful planning use for offices on the upper floors and retail uses on the ground floor.

It is of note that when the Lighthouse was redeveloped the building was in such poor condition that only the facades to Pentonville Road and Grays Inn Roads, together with the lighthouse structure itself and basement structure were retained. All internal, roof and flank wall fabric was replaced, including what has become the party wall between the Lighthouse and the Kings Cross Bridge building.

3. Proposed Development

This listed building consent application is for the formation of internal connections between the existing Grade II listed Lighthouse Building and the adjacent unlisted Kings Cross Bridge.

The connections proposed are internal works, and will not create any external changes to the property.

The connections are located around the main stair core of both buildings, which allows for minimal disruption to internal layout. The wall openings to be constructed comprise: one opening at ground floor level; two openings at first floor level which require steps and a bridge to correct for level differences between the buildings; and two openings at second floor level which also require steps and a bridge to correct for level differences between the buildings.

The five proposed openings are located on the party wall between the two buildings. These structures were entirely reconstructed during redevelopment of the Lighthouse and King's Cross Bridge buildings respectively.

Therefore only new building fabric is to be removed, with no historical significance. The rooms that will now 'link' are modern in design and again bear no historic or interesting features.

The openings are suitably designed such that the original building lines and internal spaces of the two properties will remain clear and distinguishable.

The accompanying plans and reports provide further detail of the works.

4. Assessment

The Town and Country Planning Act 1990 states:

'(2) The following operations or uses of land shall not be taken for the purposes of this Act to involve development of the land—(a)the carrying out for the maintenance, improvement or other alteration of any building of works which— (i)affect only the interior of the building, or (ii)do not materially affect the external appearance of the building, and are not works for making good war damage or works begun after 5th December 1968 for the alteration of a building by providing additional space in it underground;'

The proposed works, as outlined above, are notably confined to internal building works, and will have no material impact to the external appearance of the buildings. As such it is considered that Planning Permission is not required for the works to the property.

As noted above, the proposal to form internal connections between the Grade II listed Lighthouse Block, and unlisted Kings Cross Bridge. As the works will impact the Grade II listed Lighthouse Block, it is considered that Listed Building Consent is required for the works.

The Planning (Listed Buildings and Conservation Areas) Act 1990 provides that with regard to applications for planning permission affecting Listed buildings and /or Conservation Area or their setting:

"s.16(2) In considering whether to grant Listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"

"s.66(1) In considering whether to grant planning permission for development which affects a Listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

"s.72 In considering development which affects a Conservation Area or its setting, the LPA shall pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area."

National Policy

The National Planning Policy Framework (NPPF) (July 2021), Section 16 'Conserving and enhancing the historic environment' sets out considerations that local planning authorities should make when determining applications which relate to heritage assets, and reflects The Planning (Listed Buildings and Conservation Areas) Act 1990 considerations towards enhancement and conservation of heritage assets as noted above.

NPPF Paragraph 194 states:

'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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'

A heritage assessment has been submitted with this application, which assesses the significance and contribution of the Grade II listed Lighthouse Block. It is considered that this statement in combination with the heritage statement provides sufficient detail on heritage to assess impacts of the proposal.

NPPF Paragraph 197 notes:

'In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.'

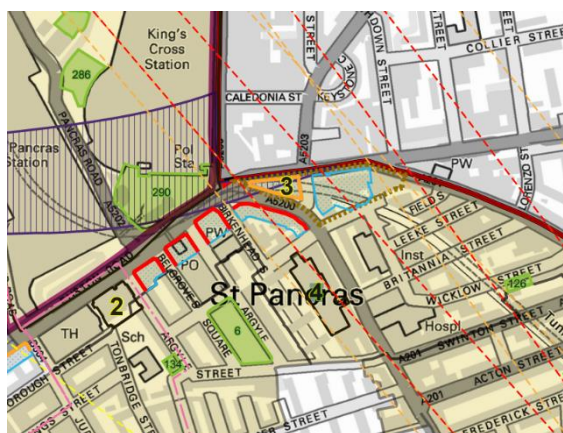
NPPF Paragraph 202 notes:

'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'

The proposal provides opportunity for the two buildings to be occupied by a single company, therefore improving the opportunity to the applicant of ensuring the office spaces remain let.

Local Policy

The Site is located within the administrative area of Camden Council. The key documents for consideration are therefore the London Local Plan (adopted in 2021), and Camden Local Plan (adopted in 2017). The Site was allocated for development under Allocated Site 3: Lighthouse block, Pentonville Road. The Council's proposals map identifies that the Site is within the Safeguarding Area for High Speed 2, within an Archaeological Priority Area and also within St Pauls Cathedral viewing corridor.



Extract of Camden Council proposals map

As noted above consideration of the works needs to reflect heritage impact of the proposals. Relevant policies therefore considered are:

London Plan:

- **HC1 Heritage conservation and growth** – states that proposals affecting heritage assets should conserve their significance and archaeological value, and the cumulative impact of incremental change to development should be actively managed.
- **HC2 World Heritage Sites** – protects World heritage Sites and encourages the promotion and enhancement their Outstanding Universal Value.
- **HC3 Strategic and Local Views and HC4 London View Management Framework** – Requires the assessment of a proposals impact on designated views.

Camden Local Plan:

- **D1 Design** – Requires development of high quality design which preserves and enhances the historic environment and heritage assets.
- **D2 Heritage** – Requires the preservation and, where appropriate, the enhancement of Camden’s heritage assets and their settings. The policy notes that the Council will not permit development ‘*that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm*’. The policy also considers the impact of development on Conservation areas, listed buildings and buildings which contribute to the character of the area.

An assessment of the proposals against the relevant policies is outlined below.

Heritage and Conservation

The location of the Site including its position within an archaeological priority and a viewing Corridor of St Paul’s Cathedral, as well as its prominence within the Conservation area, and its contribution to the area are key considerations.

The unlisted Kings Cross Bridge Site is fully constructed, and though unlisted and of modern design, also contributes to the setting in terms of further establishing the prominence of the Lighthouse building as a local landmark.

As noted above, and as expanded within the accompanying heritage statement, the Grade II listed Lighthouse Block is listed for its architectural and historic interest, and ‘*draws significance principally from the design of the exterior features, including the façade and lighthouse*’.

The accompanying heritage statement to this application states:

‘[the architectural and historic interest] is considered to be medium and is primarily derived from its appearance and historic landmark association with the area. While there have been a number of internal and external alterations, the façade of the buildings remain largely unchanged from its original design and is a high quality example of late Victorian architecture’.

The works proposed are internal works only, and leave all external characteristics and heritage detail intact. There is no archaeological or visual impact to the proposals, including any changes to the distance views to or from St Pauls Cathedral, as a result of the proposal.

The two buildings are complementary but vastly different in design. The stark architectural differences protect the appearance and characteristics of the area, and the original building lines remain intact.

The accompanying heritage statement also notes:

'the interior of the building can be considered of little historic or architectural value owing to the extensive loss of fabric as part of restoration works'.

Internal works are discreet, and impact new building fabric only due to the positioning of all openings on reconstructed walls that connect the buildings. The internal alterations are to be located around the stair core, therefore minimising changes to the building layouts accordingly.

The rooms whereby the openings are to be constructed are existing, and modern in design without original or historic features. The openings will maintain a large amount of the walls, and will instead utilise steps and bridge access to connect differing levels between the two buildings.

The design of the units are consistent with the modern office, and will create opportunity for new occupants to utilise a larger footprint within a prime area for office space within London.

The minor changes proposed to the Grade II listed Lighthouse Block, and the changes to the unlisted Kings Cross Bridge therefore preserve the character of the listed building and the conservation area.

The proposals therefore align with the heritage policies aforementioned.

5. Conclusions

This proposal offers an opportunity to provide an improved offering for occupiers within a prime area for office space within London, whilst minimising works required, and therefore preserving the character and setting of the listed building, conservation area and character of the Site.

The plans and reports provided in support of this application highlight the careful design put forward, and also highlight that there are no material external changes to the property, and minimal internal changes which are assessed to cause *'no harm to the significance of the listed building the Conservation area, and will preserve the character and appearance of both assets.'*

The proposals for Listed building Consent has been assessed according to the preservation and enhancement of heritage consent, and has been assessed against relevant policy and found acceptable in all regards.

We therefore trust that everything is in order, and the application can be determined without delay.

Please do contact me using the details set out at the head of this letter, or alternatively my colleague Nigel Dexter at ndexter@savills.com if you have any further queries regarding the application.

Yours faithfully



Hannah Booker
Planner
Savills