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Development Control
Planning Services
London Borough Of Camden
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Town Hall
Argyle Street
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TP/LNE/2021-044

15th July 2021

Dear Sir/Madam,

LISTED BUILDING CONSENT FOR INSTALLATION OF MEMORIAL PLAQUES VARIOUS LOCAGTIONS IN THE KING'S CROSS RAILWAY STATION AREA

Please find enclosed a set of application forms and accompanying details for listed building consent for the provision of three memorial plaques in three separate locations in the King's Cross station area.

At present all three plaques are displayed in the contractors' reception entrance in the station concourse, along with other, less permanent, awards, cluttering that location, and denying the plaques the prominence that they deserve. Whilst the principle of providing the three plaques is accepted by all the parties involved (Network Rail, D&D London, London Borough of Camden, Historic England and Railway Heritage Trust) it has taken some time to finalise the preferred location for each plaque. This has now been established and forms the subject of this application.

The three plaques are:

- *The 2013 National Railway Heritage Award (NRHA) Chairman's Special Award* to commemorate the restoration of King's Cross station
- *The 2019 NRHA Chairman's Special Award* plaque, issued to celebrate both the retirement of the NRHA Chairman and the 40th anniversary of the competition. The retiring chairman chose to issue the award for the total restoration of King's Cross and St Pancras stations, and the King's Cross railway lands, which he considered to be the best built heritage project he had seen in his 20 years as Chairman.

- A plaque to honour the late *Wilston Samuel Jackson*, the first black locomotive driver on British Railways, who worked out of King's Cross. (The plaque presently on display is a temporary provision, not the final plaque.)

The wording of each plaque is shown on a separate enclosure.

The following principles have been applied to the proposal:

- Plaques to be mounted where they are both relevant and visible;
- In installing the plaques, no interference with original brickwork or, ideally, any original (pre-2013 rebuild) material;
- Plaques to be mounted with their horizontal centre axis at approximately eye level, say 1.5 – 1.6m above ground level, but adjusted slightly if necessary, to ensure any screw fastenings are in mortar and not brickwork.

2013 NRHA plaque

This plaque is made to the normal NRHA design, and is cast in aluminium, with four holes for screw fastening. It is 370mm wide and 290mm high. It should be noted that the four screw holes could present a problem in mounting on brickwork if they do not all line up with mortared joints.

The most obvious feature of the 2013 redevelopment is the new concourse on the west side of the station. This area incorporates both restoration of the historic station and new works, and also has very heavy passenger traffic,

The preferred location is on the stainless-steel panel on the west side of the concourse at the north end of the modern retail range, opposite the Cafe Nero kiosk. The site does not involve historic fabric, is clearly visible, and is close to the main information point for the station, so it will be seen by many people, although it is not directly on any heavily trafficked route.

2013 NRHA plaque (40th Anniversary special award)

This plaque is made to the normal NRHA design, and is cast in aluminium, with two holes for screw fastening. It is 370mm wide and 290mm high. As there are only two screw holes all mountings can be restricted to drilling in mortar rather than brickwork.

As this plaque commemorates a range of projects, stretching from the Coal Drops, the Granary Store and the Handyside goods building in the north to the two stations and the St Pancras Grand hotel in the south, it is felt that a centralised location within the overall regeneration complex would be most appropriate. As such a location within the triangular public realm between the stations and the German Gymnasium has been selected, on the south face of the Gymnasium building for three reasons:

- The site is clearly visible from all three buildings,
- It is technically possible to fit a plaque on the German Gymnasium without affecting heritage features or the retail face (an issue with the Kings Cross building)

- It would not break up brickwork patterns (an issue with the gothic brickwork in the St Pancras building).

DD (London) holdings have agreed that the plaque can be located on their building.

The preferred location is on the easternmost column of the Gymnasium building. Although still partially obscured by the tree planters, this site is more open than any other, and is on a column that already has the street sign for King's Boulevard mounted on it. It is also a position where there is considerable pedestrian traffic moving along the north – south axes of the site and is thus considered the most appropriate location for the plaque.

Wilston Jackson Plaque

The Railway Heritage Trust has worked with Network Rail and Mr Jackson's daughters to produce a design for 510mm diameter circular plaque, to be made in cast aluminium. It will be coloured in Garter Blue, the livery of Gresley's A4 locomotives when introduced. Mr Jackson drove members of this world-famous class of locomotives, including no 60022 Mallard, holder of the world speed record for steam traction. The illustration on the plaque is of Mallard as built (and as preserved now). Although not completed (the artwork requires more attention), the current design of the proposed plaque is appended.

As a locomotive driver and fireman, Mr Jackson's work with trains at King's Cross involved their departure from the station, and their arrival into it. Being on the locomotive he would always be at the head of the train, and thus at the extreme northern end of the station on departure, and the extreme southern end, by the buffer stops, on arrival. Accordingly, the plaque is to be placed for maximum visibility on the Platform 5 dividing wall, although it is accepted that this will involve mounting the plaque on original brickwork. As the plaques are supplied with only two screw holes, drilling can be confined to the mortar only.

This location is immediately in front of passengers moving to platforms 0 to 5, and clearly visible to those heading for platforms 6 and 7. People would not congregate in front of the plaque, as the shorter lengths of platforms 5 to 8 compared with 1 to 4 divert passengers either side of the location. It is particularly appropriate as there is a clear view of the cabs of trains in platforms 1 to 4.

Policy

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.

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

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

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.

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.

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 have agreed a Heritage Partnership Agreement covering the station area. 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. However, the installation of the plaques is not covered by the Agreement, nor does it cover the German Gymnasium building in any event.

STATEMENT OF SIGNIFICANCE

Kings Cross Station is a Grade I listed building. The German Gymnasium is a Grade 2 listed building.

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.'

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.

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.

It is recognised that Kings Cross Station has significant historic, archaeological and architectural and artistic interest:

Historic Interest:

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.

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 goodbye to loved ones or pass through on their travels.

Archaeological Interest:

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:

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.

The HPA mentioned previously identifies 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. An extract is attached for reference.

The Gymnasium building was the first purpose-built gymnasium in England, constructed in 1864-5 for the German Gymnastics society. As well as being a distinct building in its own right it has a rich historic legacy and was influential in the development of athletics as a sport in Britain during the Victorian era.

ASSESSMENT

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.

It is considered that the installation of the plaques will constitute less than significant harm and, in the case of the 20123 NRSA plaque, no harm given it will be located on the stainless-steel panel within the modern western concourse. Whilst the plaque on the platform 5 dividing wall will introduce an additional sign on an otherwise relatively uncluttered area the public benefit from gaining an understanding of the pioneering role played by Mr Jackson outweighs the very minor harm created in placing the plaque in this location (bearing in mind also that the proposal is not irreversible and that the affixing screws can be located in the mortar). Similarly, for the Gymnasium plaque, the scale of the proposal is extremely modest and does not cause demonstrable harm to the façade but again raises awareness of the importance of the re-generation project in and around King's Cross.

You will find enclosed the following:

Location Plan

Drawing 062021- NRD-ECM1-KGX-DWG-EAR-000001 Ground Floor Block Plan including annotated photomontages

Wording of each plaque (separate document)

As this is an application for listed building consent only, no fee is payable in this instance.

Please let me know if you require any further information.

Yours Sincerely

Tony Rivero
Town Planning Manager EM & LNE