



KINGS CROSS CONSERVATION AREA ADVISORY COMMITTEE

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Mr Ken Bean
NW Plans and Casework
Government Office for London
9th Floor
Riverwalk House
157-161 Millbank
London SW1P 4RR

Dear Mr Bean,

Kings X Central Planning Applications : 2004/2307/P and 2004/2311/P, 2004/2313/L-2316L; 2004/2317/C-2318C; 2004/2320C-21C submitted to Camden Borough Council by Argent Kings Cross

We should like to associate ourselves with the other organisations, such as SAVE Britain's Heritage, KX Railway Lands Group and Camden Green Party, in asking the Office of the Deputy Prime Minister to call in the several KX Central Railway Lands planning applications for determination by Public Inquiry.

We feel that the application is too big, complex, and controversial to be decided by 15 Members of Camden only, as it has London-wide and indeed national implications.

You will note from the enclosed Camden and Islington local press cuttings that a fair amount of controversy has been generated on various policy and procedural issues. Should you decide to call in the application, we would want the terms of the Inquiry to also include various Conservation and Listed Building issues that concern us.

KX Conservation Area Advisory Committee (KXCAAC) is Camden's statutory committee to advise on the KX Conservation Area under the Planning Acts. It was originally set up in the 1980's as a joint Camden and Islington body and has offered advice on many aspects of the development of the railway lands. The Conservation Area status recognizes the need to protect the built and social heritage of this microcosm of 19th century transport history embodied in the lesser buildings and streets that are the setting of the monumental stations and the Granary.



Allowing demolitions of listed and unlisted buildings in a Conservation Area by an outline application creates a precedent that undermines the whole basis of listed building legislation. The rest of the KX development blueprint will change over its 15-20 years construction period, but the demolitions are final, and are scheduled to happen at the start of development. Then there is no guarantee that the rest of the development will take place as planned.

I believe our report '*Respecting the Railway Lands: KXCAAC reconsiders Kings Cross Central*' will have been forwarded to you by Camden with all the other development control papers. It also exists as a CD, including the summary version.

We would draw your attention to our Chapter 16: the tabulated comparisons of KXCAAC initial comments in October 2004 with the results of the consultation exercise reported by Camden Planners 16.1-11. As we point out there, our initial objections in October 2004, and detailed comments on the various Listed Building Consents and Conservation Area demolitions, have not been properly reported, and were largely ignored in the developer's revisions of September 2005. Hence our decision to 'go public' repeating our original comments that had not been taken on board, and adding in even more detailed comments on the Argent revisions.

We have also constructively suggested alternative approaches to save much unnecessary loss of and damage to the historic canal and industrial heritage of the railway lands, including Stanley North and South, and Culross Buildings. In Ch. 4 of our report we detail the various policies in the KX Planning Brief which support retention of Culross and Stanley North.

Just as the Great Northern Hotel is saved by a pedestrian colonnade which solves that circulation problem, so we are asking for the same imagination to be used to accommodate traffic circulation into the development by a gateway through the retained Culross Buildings. As PPG15 s.3.16 states: 'The destruction of historic buildings is in fact very seldom necessary for reasons of good planning; more often it is a failure to make imaginative efforts.'

SAVE Britain's Heritage and much of the local community want Stanley North and Culross Buildings kept. The community benefits of regeneration, and modernization of a major and historic transport interchange, should not be incompatible with the PPG 15 tests for maintaining buildings that give a historic 'sense of place'.

The Camden Agenda report of 8th and 9th March says that Stanley Building North must go this year because the Great Northern Hotel has been saved (p.221 5.6.8 and p.387 9:7:6). The report also suggests that our Culross gateway solution has been thoroughly looked at, is not feasible, does not allow enough commercial development, and spoils the



master plan.(pp. 395-398, 9.7.55 and following; p.430: 10.5.33). All these technical, and financial assessments by the Developer, Camden Council and English Heritage have taken place behind closed doors. We feel these and other PPG15 arguments need to be tested publicly at an Inquiry.

We are concerned that various issues around the conservation of the Regent's Canal heritage, the oldest section of the KX railway lands, have not been properly examined. Ch. 7 of our Report outlines the various policies in KX Planning Brief that justify the retention of the canal walls and support the need to maintain the important biodiversity of its natural habitat. The last minute exclusion of the Regents Canal Conservation Area Advisory Committee deputation from addressing the Camden Planning Committee on these matters did not help. KXCAAC were not given extra time to highlight the canal issues as well.

We refer you to the enclosed *Ham and High* press cutting (10/3/06) about the way deputations were constrained or excluded (see also *Camden New Journal* 2/3/06). There is a webcast of the committee proceedings on the Camden Democracy website: <http://www.camden.ukcouncil.net/site/> Were you to look at the first 15 minutes of Wednesday 8th March you would see the procedural constraints to which we and other deputations were subjected. Were you to look at the last 45 minutes of the Thursday 9th March webcast you would see the general confusion and time pressure in which the final decisions were taken and votes cast.

For all these reasons we would ask the Secretary of State to call the applications in to be determined by a Public Inquiry.

Should the Secretary of State decide against 'call in', I hope that he will at least issue an article 14 of the Town and Country Planning (General Development) Order 1995 Procedure Notice to allow Government Office for London and the Office of the Deputy Prime Minister time to clarify the many loose ends left by the planning committee, not all of which will be covered by the section 106 negotiations or the reserved matters applications.

Yours sincerely,

Lisa Pontecorvo
Member of KXCAAC.