

IN THE HIGH COURT OF JUSTICE

CLAIM No. CO/1185/2007

QUEEN'S BENCH DIVISION

ADMINISTRATIVE COURT

BETWEEN

THE QUEEN

on the application of

KING'S CROSS RAILWAY LANDS GROUP

Claimant

– and –

LONDON BOROUGH OF CAMDEN

Defendant

– and –

(1) ARGENT (KING'S CROSS) LIMITED

(2) LONDON & CONTINENTAL RAILWAYS LIMITED

(3) EXEL PLC

Interested Parties

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CONSENT ORDER

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UPON THE APPLICATION of the Interested Parties

AND UPON READING the first and second witness statements of Robert Michael Evans

AND UPON the first and second Interested Parties undertaking in the form annexed

BY CONSENT IT IS ORDERED that notwithstanding the emergency interim injunction contained in the second paragraph of the Order of the Honourable Mr Justice Collins dated 23 February 2007 and in order to avoid any ambiguity as to whether the following works are or are not covered by the said injunction the following works are permitted to Stanley Building North ("the building"):

(1) the stripping out of asbestos from the building

(2) the carrying out of salvage works to the following internal elements of the building in accordance with the approvals under the relevant conditions attached to the listed building consent dated 22 December 2006 in relation to the building:

original or early toilet facilities;

original or early doors;

original or early cupboards;

early wallpaper (remove samples of early wallpaper for conservation and archiving in study collection);

paint (remove samples for identification of materials and archiving in study collection);

cast iron/decorative fireplaces;

original or early washing/cooking/toilet facilities,

all of which are referred to under item 1 on the schedule of items which may be reused in Stanley Building South and under item 1.2 on the schedule of other salvage items in the salvage schedules appended to the second witness statement of Robert Michael Evans

(3) the carrying out of building recording and analysis alongside the salvage works referred to in paragraph (2) above under condition 3 of the Listed Building Consent for the building dated 22 December 2006

(4) the removal of modern internal partitions and modern internal fixings

(5) the removal of any rubbish/debris

(6) the erection of scaffolding around the building

The costs of this application shall be determined by the Court at the hearing of the Claimant's application on 24/25 May.

DATED the                      day of                      2007



**ARGENT**

Administrative Court  
Room C315  
Royal Courts of Justice  
Strand  
London  
WC2A 2LL

24 April 2007

Dear Sirs

**QUEEN (OAO KING'S CROSS RAILWAY LANDS GROUP) V LONDON BOROUGH OF CAMDEN &  
ORS - CO/1185/07**

We refer to the above proceedings and to our application to the Court.

Subject to the making of the agreed consent order we hereby undertake to the court that:

1. If we carry out salvage works to any of the elements of the Building (as defined in the Order) as permitted under (2) of the Order, we will put those items listed in (2) which we have removed for salvage (the "Salvage Items") into secure storage in accordance with the method statement approved under condition 5 of the listed building consent for the Building for as long as may be necessary in order to facilitate their possible reinstatement as set out in para 2 below.
2. In the event that the result of the final disposal of the judicial review proceedings is the quashing of the listed building consent for the Building and in the event that there is no further listed building consent authorising the removal of the Salvage Items from the Building within 18 months following such final disposal of the judicial review proceedings, we will reinstate the Salvage Items in the Building as soon as reasonably practicable after such 18 months period.

Yours faithfully

A handwritten signature in black ink, consisting of a large, stylized 'D' followed by a cursive 'K' and a long horizontal flourish.

**Authorised on behalf of Argent (King's Cross) Limited**

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**London & Continental Railways Limited**

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3rd Floor, 183 Eversholt Street

London NW1 1AY

Telephone 020 7391 4310 Fax 020 7391 4401

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Administrative Court  
Room C315  
Royal Courts of Justice  
Strand  
London WC2A 2LL

24 April, 2007

Dear Sirs

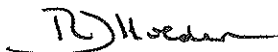
**QUEEN (OAO KING'S CROSS RAILWAY LANDS GROUP) V LONDON BOROUGH OF CAMDEN & ORS - CO/1185/07**

We refer to the above proceedings and to our application to the Court.

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1. If we carry out salvage works to any of the elements of the Building (as defined in the Order) as permitted under (2) of the Order, we will put those items listed in (2) which we have removed for salvage (the "Salvage Items") into secure storage in accordance with the method statement approved under condition 5 of the listed building consent for the Building for as long as may be necessary in order to facilitate their possible reinstatement as set out in para 2 below.
2. In the event that the result of the final disposal of the judicial review proceedings is the quashing of the listed building consent for the Building and in the event that there is no further listed building consent authorising the removal of the Salvage Items from the Building within 18 months following such final disposal of the judicial review proceedings, we will reinstate the Salvage Items in the Building as soon as reasonably practicable after such 18 months period.

Yours faithfully



Authorised on behalf of London & Continental Railways Limited