

***KXCAAC Letterhead
and Chair's address***

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DATE

Dear Sirs

KING'S CROSS EASTERN GOODS YARD PLANNING APPLICATION
2007/5228/P AND LISTED BUILDING CONSENT APPLICATION 2007/5230/C

I am writing to present this Committee's considered views upon the detailed development proposals for the Granary complex and surrounding landscaping.

[Ernest to compose explanation of role of the CAAC, and include:

While the present proposals lie within the Regent's Canal Conservation Area, it has been agreed historically that the King's Cross Conservation Areas Advisory Committee should deal with the development of the King' Cross Railway Lands as a whole. - *RCCAAC should endorse this point in their submission.]*

1) Introduction

1.1) We have carefully studied the Application and found a great many issues that seem not to have been properly considered from the standpoint of heritage. The proposals fall far short of our expectations in their handling of the special heritage assets of this site, both of architecture and industrial archaeology..

1.2) We see these assets as comprising:

- the unprecedented scale of the Goods Yard facilities when originally completed in the early 1850s.
- the architectural competence of Lewis Cubitt's design of the original Goods Station buildings (Granary, Transit Sheds and Regeneration House office block) and the simpler buildings in keeping that were added later.
- the survival of virtually the whole of this group, and all in good to reasonable condition.
- the remarkable axial planning, which was based on the symmetry of the inwards-outwards operational mode of this great railway terminus and focused

on the canal basin for the onward despatch of goods (and similarly focused on the mouth of Copenhagen Tunnel to the north).

- the various evidence for the original and subsequent methods of working of the goods station, found in the overall layout, the detailed design of the buildings and the surviving features and fittings, which together provide the basis of understanding for the alert observer.
- the rare or unique survival of some of these operational features.
- the 'gritty' industrial ambience of granite setts and cast iron furniture juxtaposed with the mellow brickwork and mature detailing of the buildings.

1.3) We acknowledge that some restricted components of the above have been addressed with care. However, whereas the Applicants' submissions widely claim that the architectural and historical integrity of the buildings is 'respected' and actually 'enhanced', their interpretation of those words would seem to differ radically from ours. Too often the truth of the matter tends to the reverse. The careful analysis in the submitted heritage appraisals and their indications of high significance have frequently been disregarded in practice.

We cite the "active walls" – grotesque electronic screens which will completely destroy the industrial context of Cubitt's Granary; the zealous and unlettered adaptations of the Transit Sheds which result in the virtually complete obscuring of the buildings' purpose and function; the grudging selection of those of the working features and artefacts that are to be retained; the wholesale ignoring of the layout of the Basin which was the very reason for the Granary's location, with substitution of the ridiculous grid-planned "beaux-arts" fountains (which we vigorously opposed in the outline scheme); and the grossly over-prominent, incongruously placed and designed "Pavilion" building,

1.4) It does not appear to be cost or practicality that are behind this. We find a cultural clash, where aspirations of fashionability and novelty have been allowed to override the heritage claims of the site.

At what point will the international architectural significance of the Granary and Goods Sheds complex be taken seriously? It belongs in an historical building group with the *Horea* of ancient Rome; with the gothic Market Halls of mediaeval Europe; with the Corn Exchanges of the 18th century; with its near contemporaries in the Docks of London and Liverpool; and with the later 19th century cast-iron-fronted Warehouses of New York. Almost uniquely, it combines membership of this group with that of Railway Stations, even amongst which it may hold its head high.

1.5) In summary, the proposals demonstrate a tragic missed opportunity to do something truly worthwhile and lasting.

1.6) We urge the Planning Department and Committee to hold back on these proposals, for reasons of their harm to the Listed Buildings, their setting and the special character of the Conservation Area, and to encourage a more sensitive approach.

Time must be taken to get things right.

We give details below of the matters that we wish to see changed.

2) The Pavilion G1

2.1) We find the aggressively stark architecture of the Pavilion to be totally at odds with the ambience of the site.

- In its own composition it has little grace, pursuing a very subjective taste in modernism.
- Its location and its massing bear no positive relationship to the formal array of heritage buildings that culminate in the Granary.
- Its antipathy towards the East Granary Office's well proportioned architecture in the classical tradition and mellow brickwork is total, and this close juxtaposition will be a disaster.

2.2) The bird's eye perspective on the covers of the drawings packages, while demonstrating the aggressively overhanging roof slab, is misleading, as it differs from what is shown in the buildings drawings. Both the roof and the ground floor will reach much closer to the East Granary Office than sketched. As if to further mislead, the Pavilion's shape is portrayed differently again in the model photographed in the Listed Building Application Supporting Statement, Fig. 7, where it is presented as much more bland. In the landscape drawings, the overhangs of the roof slab are played down. The scheme needs radical revision, including elimination of the roof projection towards the Granary Office.

2.3) The building lies immediately adjacent to a wagon turntable. This turntable is a very rare survival, and one that demonstrates a fundamental aspect of the design and operation of the original Goods Yard. The new building is sited so close to the turntable that one will be unable to visualise how it was used, because such an obstruction would have prevented its operation - there would not be room for a wagon being turned to clear the building - to say nothing of getting a clear view of it.

Furthermore, the drawings show that the building's basement would take away most of the turntable's structure and mechanism, which extend perhaps a metre below ground level plus foundations. So as reinstated it would be only a two-dimensional sham. These desecrations are further pressing reasons for adjusting the building.

2.4) The relationship to the canal is poor, as it seems to have been set down accidentally with little attempt to integrate it visually. The claimed transparency towards the canal will not be achieved.

2.5) Thus the footprint 'G1' that was indicated only at small scale in the outline planning application is demonstrated to be unsuitable and the opportunity must now be taken to move and reshape it.

3) The Loss of the Canalside Walls

3.1) Conservation Consent has already been granted, against our advice, for the removal of the texture-full, multi-coloured stock-brick retaining walls at the southern edge of the site. It is not encouraging to find no mention of their reinstatement in the replacement retaining wall alongside the ramped access to the towpath. Drawing TOWN 279.2(08)706 of the Landscape Plans package shows a 'concrete' wall next to the Pavilion, where there needs to be a facing of brickwork. The Conservation Plan (p.34) simply notes 'consented for removal'.

We must point out that the detail of the application upon which consent was granted (2004/2320/C, on the submitted plan CAC/5, item 5) is for this particular stretch of wall to be 'taken down and realigned', implying its re-erection, not removal. We insist that the re-erection, whether or not as a facing to a concrete structure, be done to conservation standards.

3.2) A brick parapet like that of the present wall is needed, to restore the retaining wall's appearance of height. The proposed lavish metal parapet on drawing TOWN 279.2(08) 6801 will be intrusive and inelegant, and will be monotonous in effect. A brick parapet can have gaps left at selected points to provide enlivening vistas.

3.3) Again, the Consent already granted has approved the demolition of the canal-side wall on the site of the proposed road bridge. This includes very unfortunately the remarkable archway of the entrance into the former Basin, blocked up around 1920. The archaeological recording programme here should include what may remain of the iron road bridge across the basin entrance behind the wall.

4) The Basin Walls

4.1) We are pleased to note a concern in the Conservation Plan that the buried walls of the Basin itself be protected for their archaeological value where practicable. But drawing UAL-U-030 (at p. 37 of the Conservation Plan) notes that the walls of the south-eastern side of the Basin and the remainder of the entrance are likely to be 'impacted', i.e. potentially removed, to their full depth. We cannot see why this should be necessary, given that the new bridge abutments will be close behind the towpath, over 10 metres away, and that Infrastructure drawing UAL-U-008 shows the underground transformer substation clear of these walls.

4.2) The latter drawing indicates the underground Fountain Plant Room placed so as to cut through the basin wall, in contradiction of the Conservation Plan's hope (p.33 col.2) that this may be avoidable. The plant room should be designed to fit within the walls.

5) The Landscaping of Granary Square

5.1) What is so striking in the early illustrations of the Granary is its setting facing a great basin, axially placed, with tunnels for canal boats to penetrate beneath the

buildings. Interchange of merchandise between the railway and the canal was a principal driver in the Granary's design.

The basin walls still exist and the Conservation Plan suggests that the coping stones are still there beneath the current lorry park. Yet the design proposals seek to deny the Basin's existence, except for a grudging deployment of marker studs.

How much better it would be if the original 1850 layout were adopted as the basis of design. The currently proposed road bridge could be interchanged with the footbridge and the whole space would become available for public enjoyment, uninterrupted by traffic. We understand some of the problems there would be in opening it again to boats, but nevertheless the basin could be partly sunken and filled with water, restoring the Granary to a more elevated and impressive position.

5.2) Even with the approved circulation layout, the area of the Basin could be expressed in different paving materials and surrounded by the reinstated or renewed coping stones, which could be formed as a kerb to hint of the former difference of levels. Indeed, such superposition and interaction of two different systems would give plenty of scope for imaginative and creative design that might soften the domineering nature of the present proposals.

5.3) With so many areas of granite setts, of interestingly variegated origins, surviving around the Granary and imparting so special a character, one that is essential to the historic importance of the site, it is distressing that so little is to be retained. They are to be reused, it seems, only in certain traffic roads, where people cannot enjoy their diverse colour and textures at close hand and their smooth-worn surfaces must probably be turned upside down to avoid a skid hazard. It is no recompense that the applicants have selected similar colours for their exotic porphyry slabs, which will have an entirely different character and great monotony.

6) The Railway Tracks and Turntables in Granary Square

6.1) Historic plans show that the railway track and two turntables along the front of the Granary have been in the same location from the beginnings of the Goods Yard. In their intactness, they are a unique survival, demonstrating the wagon shunting practice and technology of their time. They are integral to the layout of the Granary, where rail tracks ran both inside and outside. As a curtilage feature, we are very surprised that they are not included in the Listed Building Consent applications.

6.2) Their apparent relegation to landscape design and omission from the as-existing plan 376-PL-001 are not good omens. They need to be treated with the same respect as the Granary itself.

6.3) In the illustrative outline schemes for Granary Square, the track in front of the Granary was not even shown in its proper place, and we are glad that this has now been corrected. But the treatment of the eastern turntable where it will be interfered with by the G1 Pavilion (see above) shows how insufficient weight is still being given to its importance.

6.4) An equally worrying matter is that the infrastructure plan UAL-U-008 shows electrical cables with junction boxes and a 300 mm storm sewer laid beneath much of the length of the track, while electrical cables, a drainage connection and a gas connection are proposed to cross through the site of the eastern turntable. While the sewer is probably permanent and laid deep, maintenance of the cables would disrupt the carefully re-laid track. The cables need to be moved to one side and the drain and sewer connections moved away.

6.5) The proposed dismantling and reinstatement of this railway track and turntables need to be given rigorous care in conservation, with a full method statement, tagging of items and the archaeological recording of the below-ground construction. Certain of the rails are of wrought iron rather than steel, a nationally rare survival, and it is important that they are not muddled in reassembly.

6.6) The granite sett paving must be carefully reinstated around and along the length of the tracks, as they provide its historic and aesthetic setting. The illustrations on page 8 of the Urban Design Guide might mislead the casual reader to think that this is already proposed, but sadly the layout drawings show otherwise. If the setts had long disappeared, the running of the new porphyry slab paving right up to and within the historic trackwork might be more excusable, but that is not the situation. This proposed re-paving around the tracks is a desecration.

7) Historic Artefacts in the Landscape

7.1) Page 16 of the Conservation Plan assesses the important historic artefacts, demonstrative of past operations, that are located in the vicinity of the Granary. Yet, on detailed scrutiny of Section 3.8, we are very disappointed to find that the only items to be re-used in Granary Square are the tracks and turntables noted above and a single 'capstan' (actually a shunting fairlead). It seems that cast-iron access covers bearing the initials of the Great Northern Railway are not deemed worthy of display.

7.2) We are informed that Item 14 near the site of the Pavilion, described as a 'crane base' and to be removed, is the casing of the hydraulic capstan used for shunting. It must be retained near to the turntable.

8) The 'Active Façades' applied to the Granary Offices

8.1) The Applicants seem to be suggesting that the stainless steel frames for mounting the Active Displays will somehow be hardly noticeable at an architectural level, yet such science fiction is not achievable. The posts, rails and cantilevered supports will have to be robust enough to carry the loads and forces from the intervening mesh and incidental loads including snow, stood off at a distance from the walls, and not to sag or flap in the wind. Drawing 376-PL-079 shows them as 150mm wide flats, which will be visible enough in oblique view, and they are likely to finish even stouter – see sketch on p.43 of the Supporting Statement. The stainless steel wire mesh and the LED's themselves must also have a certain thickness that, repeated at close intervals, will inevitably reflect sunlight and affect the perceived

colour and shading of the façade at a distance, while the details suggest that the LED's will be prominent in themselves. The Council must not be gulled into believing otherwise.

8.2) The existing Offices have simple yet elegant facades. Their proven Georgian language is not only attractive, contributing very positively to the Conservation Area and the setting of the Granary, but also culturally important in demonstrating the style of accommodation considered appropriate to railway goods offices on this nationally important industrial site. The elevational drawing 376-PL-041 shows how the new and ugly frames and fence work imposed upon the façades will wreck these qualities.

8.3) Through their scale and close juxtaposition, the frames will impair the architectural enjoyment of the Granary itself, the site's pièce de résistance, and by standing forward they will physically interfere with oblique views of it.

8.4) Our preceding comments apply irrespective of whether the displays are illuminated by day or carry advertising, although that will add further insult to the buildings.

8.5) The introduction of these features is far from essential to Granary Square's performance as a major public space, whereas maintaining the integrity of the listed buildings and associated features very much is.

9) The Granary

9.1) We welcome the careful approach that has been taken to the conversion of the Granary and the discrete way in which the atrium is inserted while retaining the remains of the unique hoisting devices in the roof valley.

9.2) At ground floor, however we note the intended removal of the last vestiges of the platforms and turntable embayments, which show how railway wagons once circulated in the building. They determined the building's structural module and the unusual use of long-spanning cast-iron beams. At ground and first floors, the timber chutes that were a special feature of this building's use as a granary are to be stripped out, whereas they could be retained in truncated form. In such a heritage building, concessions ought to be made to its history by not stripping out such important details, with acceptance of the slightly less efficient use of space that results.

10) The Transit Sheds

10.1) These were the grandest of Victorian goods sheds, the last survivors and nationally important. Although adapted in the past, the existing fabric includes sufficient features to show the layout and logic of these working buildings. Trains entered from the north and came alongside raised platforms, across which the goods

were transferred to and from delivery carts that came and went through designated doorways in the outer walls, while wagons were moved to and from the central assembly shed via turntables and doorways in the inner walls.

In the course of the alterations now proposed, this evidence is nearly all lost, and the scheme makes very limited provision for its interpretation by future generations.

10.2) Indeed, conservation considerations seem mostly to have been limited to matching the existing brickwork in the very extensive alterations (see for instance drawing 376-PL-057).

10.3) Within these buildings, some parts of the original railway platforms remain upstanding although not identified as such on the drawings, and beneath them former stables have survived with jack-arch vaulted ceilings. We see on drawing 376-PL-075 that an attempt is made in the Western Transit Shed to retain and present a small portion of these. (It should be noted that other portions of the former stables that are indicated as opened up will be truncated in height, because of the general removal of the platforms down to the overall floor level). We are disappointed however that this amounts to no more than a so-called 'Unit to evoke spirit of original full volume', with the cast iron columns and brick jack arches re-erected from another position, and it is particularly serious that the original high clear space above the platform is entirely negated by interposing a mezzanine floor.

This half-hearted sop to understanding the past is not good enough. If this is to be the location for the careful display of the platform and stabling complex, its surroundings need to be thoughtfully redesigned with less constriction to respect the associated features. The large openings to be formed in the outer wall will get in the way of understanding the original cart entrance here, while the characteristic guard stones (referred to as glinters) that protected such doorways from wear by cart wheels appear to be indicated for demolition, which needs to be changed.

Some of the overhead runways for the former sliding doors remain in other locations (and in some cases are shown on the demolition drawings) and the original doorways here should be re-fitted with them. The inner doorway that is aligned with the turntable pit on gridline 8 should be expressed, yet its treatment is not clear from the drawings. (We hope that Section R-R on drawing 376-PL-044, showing slabs built across it, is a mistake). The turntable pit itself should be expressed in the floor surfacing (after re-survey, as it appears misaligned with the doorway), and allowed sufficient space.

10.4) We are very disappointed that at no point in either of the transit sheds is the existing vast interior space expressed, the intention seeming to be to cram in the maximum floor space throughout.

10.5) In the treatment of the exterior, we are dismayed that the western elevation of the Western Transit Shed is entirely opened up into a continuous row of giant and garish shop windows, totally altering its character, while the Eastern Transit Shed is similarly treated to an only slightly lesser degree.

Lewis Cubitt designed these sheds of unprecedented grandeur, their 7.6m (25 ft) high walls being far taller than the railway wagons and delivery carts that were to use them. He therefore articulated the façades with giant blind arcades, into which he set smaller arched doorways for the vehicles alternating with still smaller doorways for the workmen (yet on a generous scale), while leaving every second panel without an opening. So there was a subtle architectural rhythm of 'multiple orders', in which the largest arches were never conceived as openings. The Urban Design Report (p27) is quite wrong in its assertion that 'the existing rhythm of one (sic) small (sic) arch every fourth bay is maintained', since the rhythm was much more subtle. What is now termed 'small' was already of vehicle size. We believe the relationship that will be 'heightened' is one of anger.

(N.B. The perspective visualisations, e.g. Supporting Statement p. 7, mislead as to the real scale of the new openings by the old trick of using a very wide angle and placing the pedestrians closer to the viewer. The existing arched doorways are 4.5 metres (15 feet) high and the arches to be opened up are about 6 metres or 20 feet high and similarly wide).

It should be noted that the brickwork panels are bonded in, not 'infilled' as described on the drawings, and the giant arches are only on the outer face of the brickwork. Vast amounts of reconstruction are shown on the drawings in order to convert these blind arcades into openings.

For lighting the inserted upper floor, roof lights can be used. The historic architecture and industrial archaeology must be respected by not forming these openings.

10.6) In addition, the drawings show a line of roller shutters mounted across all the original doorways, severely damaging appreciation of their individual architecture and suppressing even what remains of rhythm. Such shutters should be mounted internally (as were the original sliding doors). The original architectural plinths are to be shaved off at the jambs and their historic guard rollers removed. One altered archway is to be reinstated – a paltry record of 'enhancement'.

10.7) In the eastern range, a few of the original blind panels are retained, but opening out all the other eight seems unjustified. The pedestrian-sized doorways are again all destroyed. The original form cannot be appreciated and fussy new glazing details further confuse matters.

10.8) In the northern gable ends, Lewis Cubitt's blind recessed panels are larger still, to embellish the central bays where the ends of the raised platforms abutted and there was no need for openings. But the proposed windows in their place, some 9 metres high (376-PL-074), seem a work of megalomania.

11) Conclusion

It surprises us that the proposals have been brought forward to this stage leaving such major issues without detailed scrutiny from the heritage standpoint. It may be that the size of the scheme has overwhelmed those that care. Time must be taken to get things right.