



Mr Matthew Dempsey
The London Borough of Camden
Development Management
Regeneration and Planning
Town Hall
Judd Street
London
WC1H 9JE

Our ref: E5301

31st January 2023

SENT BY EMAIL: matthew.dempsey@camden.gov.uk

Dear Mr Dempsey

CAMDEN: 103 KING'S CROSS ROAD LONDON WC1X 9LP

2022/2623/P: Construction of 4th floor mansard roof extension; to provide, 1 bedroom self-contained dwelling, with recessed terrace.

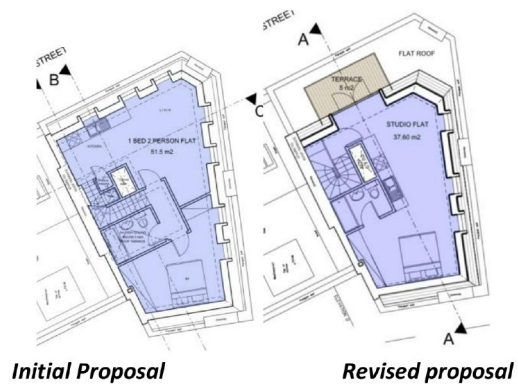
1. I note from the Council's website that amended plans were submitted on 18 January 2023 in respect of the above application. This follow up letter is confirmation that my original objection letter dated 12 August 2022 on behalf of the owners of Flats A, B and C in No. 103 Kings Cross Road, who are directly affected by it still stands.
2. The proposal has been amended by introducing a 2m setback on the Frederick Street elevation. The three dormers have been replaced with French doors which open onto a 5 sqm terrace on the front portion of flat roof. There has been no other change to the mansard's design or height.
3. The proposal is now for a 1-bed 2-person studio flat with a gross internal area of 37.6 sqm. The application plan reveals the applicant's intention to put a double bed in the bedroom. Obviously, this is well below the 50 sqm national standard.

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Initial Proposal

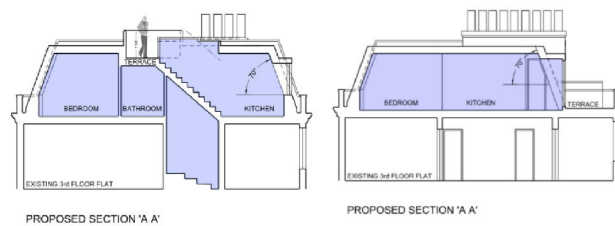
Revised proposal



Initial Proposal

Revised Proposal

4. The section comparisons below show the angle of the mansard is unchanged and it remains a flat-topped modern mansard in style.



Initial Proposal

Revised proposal

Grounds of Objection

5. We agree with the Conservation Officer's response that *the host building has a vertical emphasis marking its corner location, largely deriving from proportions of its facades which are characterised by tall sash windows and also by the central corner chimney and eastern chimney which rise noticeably above the main parapet. This gives the building an appropriate status within the townscape which does not need to be further extended or emphasised and which strikes a balance with the adjacent building heights including the front parapets and roof forms of the grade II listed townhouses.*

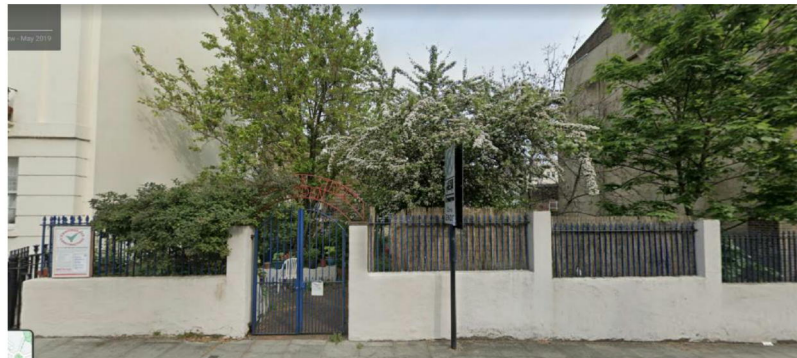


6. The photo below shows the listed buildings at Nos 12-26 and 9-27 Frederick Street. They were built at the same time and in the same style as Nos 1-7. They show that Cubitt often terminated his terraces with a fourth, low, upper above the cornice line. The 4-storey application building obviously terminates the terrace Nos 1-7 in the same way.



7. No. 103 is already higher than the Frederick Street listed buildings which have low pitched slate roofs behind their parapets. A fifth storey will unbalance the historic composition of the terraces and so be inconsistent with the character and appearance of the Conservation Area and the listed buildings.
8. The proposed slate mansard roof with lead clad dormer windows with large sash windows and French doors will be prominent on this corner site and will harm the setting of the listed buildings. It would be a harmful, incremental addition incongruously marring the distinctive rhythm of the roofscape on display in this part of the terrace.
9. The windows do not respond to the fenestration pattern of the host building. The horizontal emphasis of the French doors (opening onto a terrace on Frederick Street) compete with the vertical fenestration pattern of the lower floors and the modest skylight windows in No. 1 Frederick Street.
10. It would diminish the setting of the listed buildings and the character and appearance of the Conservation Area conflicting with **Camden Local Plan (2017) Policy D2 (Heritage)** which resists development that would cause harm to significance of a listed building through an effect on its setting.
11. The proposal is inconsistent with the Council's **Planning Guidance – Design (2021). Para 5.13** explains *Rooflights, additional storeys, mansards, and other roof alterations are likely to be acceptable where:*
12. ***Good quality materials and details are used, and the visual prominence, scale and bulk would be appropriate having regard to the local context.*** This a prominent corner site and the proposal would clearly be visible and over-dominate the listed terrace on Frederick Street.
13. ***There is an established form of roof addition or alteration to a group of similar buildings and where continuing the pattern of development would be a positive design solution, e.g., helping to reunite a group of buildings or townscape.*** The addition of a mansard roof extension in this instance would not infill a gap or reunite the terrace group. It is far from a positive design solution.
14. ***Alterations are architecturally sympathetic to the age and character of the building and retain the overall integrity of the roof form.*** The proposal will destroy an original roof form of a building that makes a positive contribution to the character and appearance of the Conservation Area.

15. **Para 5.14** indicates a roof alteration or addition is likely to be unacceptable in the following circumstances where there is likely to be an adverse effect on the skyline, the appearance of the building or the surrounding street scene:
16. **Buildings which have a roofline that is exposed to important London wide and local views from public spaces.** The proposal at this corner junction site will have an adverse effect because its roofline is exposed to local views from Frederick Street Garden opposite the site as well as the busy Kings Cross Road.



17. **Buildings whose roof construction or form are unsuitable for roof additions.** The OS plan below shows the early shallow underground line from Farringdon to Kings Cross runs under the application site. This was constructed by cut and fill and is open behind the pub opposite. An extra floor may cause structural difficulties because of this.



18. ***Buildings designed as a complete composition where its architectural style would be undermined by any addition at roof level.*** No. 103 is a complete composition, and the mansard roof extension covers the main roofscape which means it is not subordinate.
19. ***The impact on adjoining properties both in terms of bulk and design and amenity of neighbours would be detrimental, e.g., due to a loss of light from the additional height.*** As well as over-dominating and over-looking its neighbours, the roof terrace element has the potential to harm the amenity of the existing flats in No. 103 by way of noise and disturbance.
20. ***Buildings that are part of a group where differing heights add visual interest and where a roof extension would detract from this variety of form.*** The application site is part of a terrace and adding an extra storey would detract from the importance of the adjoining listed buildings.
21. ***Where the scale and proportions of the building would be overwhelmed by additional extension/storeys.*** Adding a 5th floor will make the building appear top heavy over dominating the listed building.
22. We also note an error in the plans which show the staircase will lead to a roof terrace which is incorrect and should be removed.

Conclusion

23. We agree with the Council's Conservation Officer that the overbearing nature of the additional height will harm the adjacent terrace of listed buildings and that the flat-topped mansard design is contrary to the Council's planning guidance (2021). The proposal will diminish the host building's positive contribution to the Conservation Area and adversely affect views from the open space opposite.
24. It will cause less than substantial harm to these heritage assets. No public benefits are identified to mitigate this harm, as the NPPF requires.
25. The Council is respectfully requested to refuse the application because it is contrary to national and local policy and practice as identified above and it will have an adverse effect on the character and appearance of the Conservation Area and the adjacent listed buildings.

I would be very grateful if you could acknowledge receipt of this letter of objection.

Yours sincerely

Emma McBurney
Director

Michael Burroughs Associates Limited