



13<sup>h</sup> February 2025

2024/5792/P

Edward Hodgson  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

**OBJECTION to 2024/5792/P**  
**King's Cross Methodist Church, 58A Birkenhead Street, London.**

Dear Mr Hodgson,

We object to the aforementioned scheme on the following grounds.

1. Excessive height and poor massing and design, and the subsequent impact on the significance of the Bloomsbury Conservation Area and on the setting of neighbouring Grade II listed buildings (policies D1 and D2).

The principle of a 1-2 storey extension on this site is considered generally acceptable. However, the detailed design of the currently proposed extensions and the reconfiguration of the elevations onto both streets is considered poor in its design approach, failing to pay proper regard to the qualities of the existing townscape and especially the neighbouring Grade II listed buildings.

The use of an oversized Dutch-stepped gable is not justified for any reason and the general use of brickwork for alterations at roof level is also unhelpful, by increasing the general sense of overbearing and scale / massing in relation to listed neighbours and the surrounding historic townscape. Roof-level extensions should, generally, be set back and draw from the surrounding roofscape in massing, materiality, etc. While a distinct design approach may be appropriate given the religious use of the building, the current approach does not relate to this religious use and is not considered to hold aesthetic merit in its own right.

The use of darker brickwork for the Crestfield Street elevation and the irregular fenestration is also inappropriate, and appears both visually incoherent in itself, and at odds with the surrounding townscape. Irregularity is not a problem per se, but the general execution of this elevation we consider to be poor, and without any precedent / justification or aesthetic merit. The choice of materiality is especially poor and is not subservient to or respectful of the significant listed buildings in its vicinity. The general sense of scale and bulk is also not respectful of the neighbouring, finely detailed and small scale listed dwellinghouses.

We note that the heritage report does not explicitly consider the impact of the proposal on the setting of the neighbouring Grade II listed buildings, which, in heritage terms, should be the primary consideration. It instead considers impacts on the heritage significance of the building itself to be the primary consideration, which is surprising considering its undesignated status.

We also note that the building is of a religious use and that therefore, a different design approach to the neighbouring terraces may be acceptable, and that signifying this use through design choices is also advisable. However, in our view, the external treatment as an oversized 'Dutch' building does not actually mark this building as being religious or associated with the Chinese Christian community, nor pay due regard to its location in a sensitive historic site.

2. Failure to properly consider the impact of plant and machinery on the occupants of neighbouring listed dwellinghouses (Policy A4).

Having been alerted to the proximity of considerable rooftop plant to neighbouring residential windows, we note that the acoustic report has not properly recorded background noise levels in its noise survey. These have been recorded along Birkenhead St rather than to the rear of the building where the plant is located. Given its central location and proximity to national rail termini, these should be remeasured at the rear to ascertain whether the 10dB test in Policy A4 is met.

### General Notes

1. This scheme causes harm to heritage assets of high significance and does not meet the tests set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. In our view the scheme does not provide sufficient public benefits to outweigh this harm. While the provision of religious and community space is certainly to be supported, the extensions at roof level are to provide student accommodation, presumably to help make the scheme more financially viable. There is an ample supply of much higher quality purpose-built student accommodation in the area, and many units currently under construction. As such, the provision of a limited number of low quality units on a constrained site is of limited benefit and not an efficient use of the land. We therefore do not consider this to outweigh the harm caused to designated heritage assets.
2. A similar uplift in floorspace can likely be provided while reducing overall perception of scale and improving design quality. This can be achieved by paying better attention to the quality of the surrounding townscape, and seeking to minimise rather than accentuate increase in scale. We would therefore hope that the applicant can be encouraged to return with a revised, more sensitive scheme, which achieves the same aims without causing heritage harm.