KING'S CROSS CONSERVATION AREA ADVISORY COMMITTEE

Ernest James, 21 Antrim Mansions, London NW3 4XT, 020-7722-0990

Neil Mc Donald Development Control London Borough of Camden Camden Town Hall Extension Argyle Street London WC1H 8EQ 12 Aug 2014

Dear Mr McDonald,

101 Camley Street, London NW1 0PF, Application No. 2014/4385/P 102 Camley Street, London NW1 0PF, Application No. 2014/4381/P

The King's Cross CAAC objects strongly to both these proposals and particularly No. 101, which is largely within the King's Cross Conservation Area.

- 1) Recent approvals have led to the erection of slabs of tall buildings north of the canal, at 103 Camley Street and Kings Cross Central T1, where there were none before. We regret this change to the skyline and the northern edge of the canal, and No. 102 would exacerbate this, making more of a wall of buildings and visible in many views from the south and south-west.
- 2) The proposals at No. 101 would cause that wall to cross the canal in a right-angled direction, so converting a linear arrangement into one that was three-dimensional and so much more intrusive, impinging heavily on the two conservation areas which it would thus straddle. This is demonstrated in the aerial visualisation at 2.9 on p.16 of the Design and Access Statement for No.101.

The canal would be put locally into a canyon, whereas hitherto the canal hereabouts has had an exceptionally open aspect, with a feeling of wide skylines and associated tranquillity because of the canal's width relative to existing building heights. Thus the proposals would be very damaging to the special character of the canal within the Regent's Canal CA. The high-rise form and its dense packing at ground level would remove tranquillity also from this part of the King's Cross CA.

3) A further problem would then arise, of where the high-rise might stop. A precedent might be seen to be set for dense high-rise development as far as St Pancras Way, across the hospital site in our CA and in place of the former Post Office Sorting Office in the Regent's Canal CA. The latter building is unjustly described in the Conservation Appraisal as having "a particularly poor relationship to the canal", probably because of its bulk compared with older buildings now gone. Yet a taller set of buildings would be far less acceptable.

- 4) Camley Street from the Regent's Canal southwards provides a topographically characterful link that is used by walkers between the Camley Street Natural Park, the Old St Pancras Churchyard and a nodal point on the canal at Oblique Bridge. The trees that surround the southern end of No.101 are especially important to this route as they provide a dense enclosure of foliage, matching that bordering St Pancras Gardens. The proposals appear to show the plane trees near the pavement edge retained, but the low trees within the site boundary which are so essential as a screen would be removed. In its place would be 6-storeys of building rapidly rising to ten, i.e. taller and bulkier than anything existing in this locality (whereas the hospital water tower and chimney are elegantly slim) and overpowering the plane trees, thus critically damaging the almost rural view up Camley Street from the south.
- 5) Near the further end of Granary Street the site has a further group of trees that nicely softens the street corner on the border of our CA and provides a valuable wildlife haven and informal greenery on the Regent's Canal side. A smaller and intensely urban recreational space is proposed here, with no room for sizeable trees or undergrowth. Thus the proposals cause attrition of the Conservation Areas' character at every point.
- 6) The applicants' Townscape, Heritage and Visual Impact Assessments concentrate too much on the statutorily listed buildings of which there are none in the immediate vicinity, on the humdrum character of the buildings currently within the two sites, and on lauding the new proposals. They ignore the unlisted buildings and other built features that contribute positively to the area's character, and omit to mention that Camden does not locally list buildings in conservation areas. Particularly, they fail to come to grips with the special spatial characteristics of the conservation areas here, which would be damaged or destroyed. In addition to what can be seen on the ground, a good appreciation of this can be got from Google Street View. This is not within the KX Growth Area, nor is it a highly accessible area adjoining one of the town centres. Yet the proposals on the two sites have intense densities and seem to be grabbing as much airspace as they can. Paragraph 1.22 of the LDF Core Strategy calls upon schemes of dense development to consider sensitively the character and built form of their surroundings, particularly in conservation areas, which we do not think has been done here.
- 7) Development Policy DP25 states the Council will (b) only permit development within

conservation areas that preserves and enhances the character and appearance of the area, and (d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area. We call upon the Council to reject these schemes and particularly No.101, which lies within the conservation areas.

Yours,

Ernest James for KXCAAC