

**THE REGENT'S CANAL CONSERVATION AREA ADVISORY COMMITTEE**  
**31 OVAL ROAD, CAMDEN TOWN, LONDON NW1 7EA**

Chairman: Anthony Richardson

Please reply to: Anthony Richardson email: [anthonyrichardson@arparchitects.co.uk](mailto:anthonyrichardson@arparchitects.co.uk) Tel: 020 7485 0991

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BY E-MAIL to [jenna.litherland@camden.gov.uk](mailto:jenna.litherland@camden.gov.uk)

Dear Jenna

**King's Cross Central Fish and Coal Offices,  
Application Nos. 2014/5272/P and 2014/5273/P**

We have objections to the enlargement of stables windows facing the towpath beneath Block 5 and to the remodelling of the roof of Block 4 as a conservatory. Also comments about the parapet of Block 2 and reusing historic bollards. Sorry for late response.

**1) Enlargement of windows in the arches facing the towpath.**

The Refurbishment Parameters in the Outline Consent, quoted on p.15 of the present Urban Design Report, specifically state that 'The existing pattern and sizes of windows within the FCO would be retained'. Yet the windows facing the canal in the vaults under the Fish and Coal Offices are proposed to be altered. These include five windows at high level in the basement under Block 5 that are particularly distinctive, having been designed for stables, as the Conservation Area Appraisal remarks. These small window openings are characteristic of industrial stables and are historically very valuable evidence, indicating that the vaults were used for that purpose by the railway. (See photograph at end of this letter). These windows have been temporarily bricked up in recent years (since the conservation area was designated), but their characteristic joinery and small panes can be reinstated from photos.

Page 40 of the CA Appraisal also comments on solid walls flanking the canal as an essential element of the conservation area and it states that openings in them should be kept to a minimum, which the present small size of these openings achieves.

The five other arches further east under Block 4 and Block 3 were not stables and their windows (also now bricked up) are historically less critical. They are already wide. We do not see that is necessary to enlarge the stables windows likewise. The approved Initial Conservation Plan referred to '*repairing or reinstating* the stable windows onto the canal'. There was subsequent reference to possibly enlarging some of them, but the present proposals enlarge them all. That is 'mission creep'.

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The proposals will considerably widen these windows (to 3 metres) and much lower their sills, so destroying their intrinsic character. Page 78 of the Urban Design Report under 'Response to Design Guidelines' is misleading, because it shows only the deepening of sills on the non-stables windows, which are already wide and relatively deep.

Page 79 in the Response to Design Guidelines presents reasons for the intended window enlargements, but the arguments are all slanted towards a particular outcome. Here are our reverse arguments against the applicant's points:

- *Bringing life and activity to the canal towpath*: The increase of footfall from the KXC development has already achieved that. Increasing activity will damage the canal's tranquil seclusion, included in the CA Appraisal's summary of special Interest, which is already being eroded.
- *Strong visual links with canal*: These exist already, so don't need increasing.
- *Public realm views into the vaults*: These will be available through the five more eastern arches.
- *Bringing more people onto the towpath*: C&RT's Canal and River Trust national aspirations are poorly attuned to the inner London situation and already in need of review.
- *Safety through natural surveillance*: That argument is flawed, since there will always be other places along the towpath without windows, and if criminals indeed wish to lurk in seclusion they will go there instead. In any case, Increased footfall has reduced that possibility.
- *Increasing daylight in the vaults*: Many restaurant users enjoy vaults for their enclosed atmosphere, not for views out, and there are other restaurants within the proposal to allow for other tastes, such as in the vaults with already wider openings under Block 4.
- *Providing for natural ventilation*: The stables windows will be sufficient for that.
- *Expressing externally the new use of the building*: There will be plenty of evidence for the new uses of the building, and enlarging these openings would add very little in that regard.
- *Creating a rhythm along the façade*: The existing rhythms are simple and successful, related to historic function. This is a historic building and it should not be tinkered with in such a manner. Moreover, changing the stables windows will create a problem where they currently continue but the development stops, beyond Block 5. There is no approval for changing the windows there.
- *Celebrating the difference between old and new*: The destruction of historic features should not be the subject of 'celebration'.

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- *Complementing the shop fronts.* This is a façade of quite different character, and such a link should not be imposed. Indeed, where the larger windows are to have new metal frames, these and the proposed large window panes will not be in keeping with style on the floors above. Also they will be detrimental to the towpath's visual tranquillity.

We have another concern:

- The glare from un-shuttered windows in the evenings will affect wildlife habitats, which the CA management strategy says need to be sensitively considered – these windows face the Camley Street Natural Park and until the recent increase of largely unauthorised moorings, this stretch of canal was particularly secluded and encouraging of bats and birds.

Enlarging the stables windows would do much harm to the historic character, whereas the designers have taken care to protect historic character in most other aspects of the scheme. Not enlarging the stables windows would not jeopardise the putting of the building to new use. So we ask you to request new proposals here as a condition of consent.

## **2) Block 4 conservatory.**

We object most strongly to the form of the glass conservatory at roof level in Block 4. This intervention severely disrupts the succession of slated pitched roofs and chimney stacks at descending levels which is the most striking and memorable feature of this remarkable range of buildings and a very positive contributor to the buildings' character. Its shape and materials rudely interrupt the building's architectural form and texture, which other efforts have striven to maintain. See photo at end of this letter. The conservatory is therefore very damaging to the character of the conservation area and should not be allowed. We would not oppose the raising of the roof of this block, to meet circulation and space requirements, if in a way somewhat similar to the rejected Option 4 in of the Urban Design Report (page 18), but raised further for useable headroom and with eaves aligning with the wall top – there is still room to maintain a satisfying gradation of slated roofs. There is no demonstrated need for a glass roof. Page 19 refers to an 'overriding philosophy to make a clear distinction between old and new', but that is an invention of the designers and nothing absolute. Other more subtle ways could be used to indicate to the discerning eye that there has been an intervention (so avoiding the charge of pastiche), while not damaging the essential features of the roofscape.

## **3) Roof Parapets of Block 2**

The Initial Conservation Plan quoted on p.17 of Urban Design Report suggests rebuilding the parapets in the pre-fire form might be considered. A pre-fire photo in the Conservation Plan shows that they originally projected further, modelled in

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brickwork like a cornice, giving more majesty to this original Coal Office. Why has this not been followed through?

**4) Salvage and redisplay of historic bollards**

Two cast-iron bollards with the railway company's monogram 'GNR' are mentioned in the Historic Building Baseline Report for the Wharf Road Viaduct, in Appendix A of the Conservation Plan. They are visible in a photo on page 8 of that plan, guarding the top of the steps. Why does there seem to be no provision for reusing these in the scheme?

With kind regards

Anthony Richardson

Chair

*Photos on the next two pages illustrate the stables windows and the existing roofscape.*



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*Characteristic stables windows under the Wharf Road Viaduct, seen before bricking up, similar to those under Block 5. These windows, inserted in the vaults when increasing railway traffic necessitated additional stabling capacity, symbolise the wide use of horses in 19th century railway operation.*



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*View from St Pancras Lock, showing cascade of slate roofs on Blocks 2, 3 and 4. Replacing the Block 4 roof by a glass box will be highly damaging, and will also create confusion in the townscape between old buildings and new. Note that views from the intended footbridge will be similar to this, becoming a key view.*