



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

Our ref: E5301

12<sup>th</sup> August 2022

SENT BY EMAIL: [matthew.dempsey@camden.gov.uk](mailto: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. This letter objects to the above application on behalf of the owners of Flats A, B and C in No. 103 Kings Cross Road, who are directly affected by it.

**The Site**

2. No. 103 is a 4-storey Victorian building in a prominent location on a corner site at the junction of Kings Cross Road and Frederick Street. It is identified as making a positive contribution to the Calthorpe Street/Frederick Street Sub Area 14 of the Bloomsbury Conservation Area. It adjoins the four listed terraced houses at Nos.1-7(odd) Frederick Street built c1835-39 by William Cubitt.
3. The map below also shows the many other listed building near the site (red line), which is virtually surrounded by them. Nos. 34 and 32 Cubitt Street, 76 Kings Cross Road, 9-27 and 12-26 Frederick Street are all Grade 2 listed and the application building forms part of their setting, which will obviously be eroded by the proposal

Emma McBurney

BSc (Hons) MSc MRTPI  
emma@mbaplaning.com

Michael Burroughs

BA MRTPI FRSA  
michael@mbaplaning.com



4. The 4-stoey application building is shown in the photo below with the adjoining 3-storey listed white stuccoed terraced houses at Nos1-7. These have retained their original form and fittings through their 200-year life. The application building is higher than them and No. 105, the public house on the opposite side of the junction with Kings Cross Road.



5. 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.



### The Proposal

6. The proposal description reads *Construction of 4th floor mansard roof extension; to provide, 1-bedroom self-contained dwelling, with recessed terrace*. This will be a 5<sup>th</sup> floor addition.



**Proposed Kings Cross Road Elevation**

**Proposed Frederick Street Elevation**

7. The proposal creates a 1-bed 2-person unit which measures 51.5sqm. The floor plan notes that the bathroom has a reduced 2m high ceiling in order to accommodate a 5sqm recessed roof terrace above. This room is clearly below the national 2.3m and 2.5m London floor to ceiling height.

### Grounds of Objection

8. 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.

9. The proposed slate mansard roof with lead clad dormer windows with large sash windows 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.
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 all the 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 5<sup>th</sup> floor will make the building appear top heavy over dominating the listed building.

#### **Conclusion**

22. The proposal will diminish the host buildings positive contribution to the Conservation Area and Council is respectfully requested to refuse the Application because of its lack of consistency with the Council's general policy and practice and its adverse effect on the character and appearance of the Conservation Area and the adjacent listed buildings. No public benefits are put to mitigate the harm it will cause to these heritage assets.
23. I would be very grateful if you could acknowledge receipt of this letter of objection.

Yours sincerely

**Emma McBurney**  
Director

**Michael Burroughs Associates Limited**  
[emma@mbaplanning.com](mailto:emma@mbaplanning.com)