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Application No:	Consultees Name:	Received:	Comment:
2023/1580/P	Henry Gomm	31/05/2023 17:07:57	OBJ

Response:

On behalf of our client Brian Lake, resident at 9-11 Healey Street, we object to the above application and set out the reasons why below. The application seeks the erection of a mansard roof extension with new front and rear dormer windows and PV panels.

This follows the refusal of a recent application (ref. 2022/4000/P) for a rear extension, including a mansard roof extension and was rejected on the grounds that the proposed roof extension by reason of its design, bulk, height and location on a terrace of largely unimpaired rooflines, would be detrimental to the character and appearance of the host building, the integrity of the locally listed terrace and the surrounding area.

It is considered that the current proposal by reasons listed above, would also be detrimental to the character of the building and, by association, to the integrity of the locally listed terrace and should therefore be refused.

Setting

The application site forms part of the Grafton Crescent locally listed terrace (7-13 (odd) and 16-26 (even)). Camden's local list identifies that the two terraces are prized for their architectural and townscape significance. The listing is as follows:

Two terraces of mid-19th century houses with small paved front gardens on either side of Grafton Crescent (formerly known as Junction Street). Three storeys in stock brick with stucco to architraves and ground floor elevation. Comparable detailing on either terrace, for example the design of door and window architraves; and distinct differences for example the parapet cornice and first floor window balustrades on 7-13, and the central projecting three bays to the terrace of 16-26. Very attractive and well-preserved group which forms a high-quality piece of historic townscape.

Although development of non-designated heritage assets is not restricted by policy, paragraph 203 of the NPPF states that "the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application". This is echoed through Local Plan Policy D2 (Heritage) whereby the effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

As harm is identified to the significance of this non designated heritage asset paragraph 203 of the NPPF applies. A balanced judgement is therefore required having regard to the scale of harm and the significance of the asset. The scale of harm to the asset is identified as significant in the context of the overall qualities of the non-designated asset.

Further, as there is no public benefit proposed as part of the scheme, the effect on the locally listed buildings should be seen as a weighty material consideration in the determination of the application. It is noted in the offers report for the refused permission at 23 Healey Street (ref. 2016/1596/P) that the proposed mansard roof extension is not an appropriate form of development for that location and the need to provide a larger family home is not sufficient to outweigh the harm identified.

In undertaking a balanced judgement it is considered that the harmful impact on the integrity of the locally listed buildings is not outweighed by any public benefit arising. That harm is consistent with the previous

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assessment (2002/4000/P) and therefore this scheme should also be refused.

Design

The Design and Access Statement submitted with the application states that due to the set back from the front parapet, the proposed mansard extension would not be visible from the public streetscape of Grafton Terrace. However, the accuracy of the visualisations provided is questionable. There is no stated methodology for the preparation of the indicative drawings. Further, the sketches locate the proposed roof form on the wrong building (Figures 8 and 10). The DAS is not sufficiently robust to be relied upon to form an accurate judgement on the visibility of the proposals.

Tellingly the height of the proposed mansard mimics that of the existing chimney stack (see drawing ref. 247-007. Rev A). As the chimney stack can be clearly seen in figure 7, it is considered that the roof extension itself will be seen. The architectural mock-up (figure 8) as depicted on page 6 fails to properly represent the likely visibility of the proposal in-situ.

Paragraph 5.8 of the Camden Design Guide states that a roof alteration or addition is likely to be unacceptable where:

- there is likely to be an adverse effect on the skyline, the appearance of the building or the surrounding street scene:
- There is an unbroken run of valley roofs;
- complete terraces or groups of buildings have a roof line that is largely unimpaired by alterations or extensions, even when a proposal involves adding to the whole terrace or group as a coordinated design; and
- the building is designed as a complete composition where its architectural style would be undermined by any addition at roof level.

The proposed roof extension would be visible above the parapet contrary to the requirements of Paragraph 5.8.

Given that the locally listed properties on this side of Grafton Crescent have been largely preserved and retain a roof / parapet line which is largely unimpaired, the proposals represent an unacceptable addition atop the existing building, disregarding the character, height, scale, massing and modulation of the surrounding area and therefore contrary to Local Plan Policy D1 (Design) and Kentish Town Neighbourhood Plan Policy D3.

Precedent Examples

The Design and Access Statement highlights examples of other mansard roof extensions within the immediate vicinity of Grafton Crescent. Of note these include:

- Roof extension and terrace at No. 14 Grafton Crescent
- Flat roof at No. 15 Grafton Crescent
- Roof extension at No. 13 Healey Street
- Roof extension at No. 21 Healey Street
- Entrance to No.21 Healey Street from Grafton Crescent

The flat roof at No.15 Grafton Crescent and the roof alterations at No.14 Grafton Crescent do not provide any support for the proposals given that the street frontage parapet line is not compromised by these arrangements and no visible structure rises above it. Accordingly, the unbroken roof line of the north side of

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				Grafton Crescent remains preserved intact.			
				Further, all the other identified roof extensions are beyond the catchment of this specific non-designated heritage asset which is made up of the north side terrace of Grafton Crescent. It is therefore considered that there are no persuasive or binding precedents which dictate that a roof extension is an appropriate form for this specific location.			
				Conclusions			
				Whilst the revised scheme is less visible in nature than that previously refused, the probtrusive and harmful and therefore fail to address the harm to the unbroken roofline terrace. We therefore request that you refuse the application as the scheme fails to c Policies D1 (Design) and D2 (Heritage), and Kentish Town Neighbourhood Plan Policies D1 (Design) and D2 (Heritage).	of the locally comply with the	listed	
				It is respectfully suggested that the proposed mansard roof extension, by reason of it location on a terrace of largely unimpaired rooflines, would be detrimental to the char the host building, the integrity of the locally listed terrace and the surrounding area.	•		
				Please contact my colleague, Michael Lowndes, or myself should you have any queri	ies on the abo	ove or wish	

to discuss our representations.

Total: 4