

13 Grafton Crescent
November 2023



**DESIGN AND ACCESS
STATEMENT
13 GRAFTON CRESCENT**

Quality Assurance

Site name:	13 Grafton Crescent London NW1 8SL
Client name:	Alexis Zegerman and Peter Graff
Type of report:	Design and Access Statement
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Date	26 th October 2023
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Date	14 th November 2023



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1.0 Introduction

- 1.1 This Design and Access Statement has been produced by Bidwells on behalf of Alexis Zegerman and Peter Graff to support the erection of a mansard roof extension at 13 Grafton Crescent, London, hereafter called 'the site'. It should be read in conjunction with the Heritage Statement produced by Janus Conservation dated March 2023, as well as the Bidwells Heritage Impact Assessment 2023, both of which accompany this application.
- 1.2 The site is located on the western side of Grafton Crescent. There are no listed buildings located within the site, however, No. 13 has been identified as a 'Locally Listed' Building by Camden Council, so is considered to be a Non-Designated Heritage Asset. It is not within a conservation area, however, the north-west corner of the Kelly Street Conservation Area is approximately 26m north-east of the site.



Figure 1: Aerial showing the location of the site, the boundary is marked in red (Google Maps)

The Report

- 1.3 This Design and Access Statement establishes the design principles and concepts that have been applied to the proposed development at 13 Grafton Crescent. This document demonstrates the steps taken to appraise the context of the development and how the design takes that context into account in relation to the buildings proposed use. It has been formulated using the assessment methodology contained within the National Planning Policy Framework (NPPF) (paragraphs 194, 195, 197, 199, 201) and local planning policies within the following documents:

- Camden Local Plan 2017
- Home Improvements CPG Jan 2021
- Design CPG Jan 2021
- London Plan 2021

- 1.4 It also takes account of the relevant Historic England guidance, most notably their best practice guidance documents, Conservation Principles (2008 and revised 2017) Local Listing, Identifying and Conserving Local Heritage, and finally Conserving Georgian and Victorian Terraced Housing.
- 1.5 The knowledge of the site has been derived from a site visit undertaken by Katherine Harrison and supported by archive and desk-based research- including the HER.
- 1.6 The report is not a detailed record, or assessment, of building fabric.

Authorship

- 1.7 This document has been prepared by Katherine Harrison BA(Hons) MSt IHBC, Principal Heritage Consultant and reviewed by Daniele Haynes BA (Hons) MSc, Principal Heritage Consultant.

Additional Information

- 1.8 The following additional information is provided to support this submission:
- Application form
 - Site location plan
 - The appropriate fee
 - Existing and proposed drawings
 - Heritage Statement by Janus Conservation
 - Impact Assessment by Bidwells

Research Methodology

- 1.9 This Design and Access Statement is the result of a robust process which assesses relevant documentary research (including HER records, maps, drawings and reports, as well as archive material where relevant) and professional judgment.

2.0 Designated Heritage Assets

- 2.1 Number 13 Grafton Crescent has been identified as a 'Locally Listed' Building by Camden Council. The local list was adopted on 21st January 2015. The property is therefore considered to be a Non-Designated Heritage Asset.
- 2.2 The National Planning Policy Framework defines a heritage asset as:
- "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."*
- 2.3 Number 13 is part of a terrace of period buildings on the east side of the crescent, stretching from numbers 7-15. The odd numbered buildings 7, 9, 11 and 13, but not 15, are included in the local list. The even numbered buildings 8, 10, 12 and 14 are excluded.
- 2.4 A handful of listed buildings are around the site however, by virtue of topography of the road, intervening development, and their massing the majority are not visible from within the site. The property is not located within a conservation area.
- 2.5 The full local list description can be found in Appendix 2.



Figure 2: The distribution of Listed Buildings in 100m of the site is shown in map above taken from Historic England webpage 'Search the List'. Every blue triangle on the map represents a listed building - site location highlighted in yellow.

3.0 Aerial View

Introduction

- 3.1 The following views were taken from Google Earth. Note that from above and within the wider context of the area, mansard roofs along terraces are a common feature and vary in size and design. Within long distance vistas of No. 13 Grafton Crescent the proposed mansard will not be read as an isolated inclusion on a terrace but rather a common roof addition within the wider context and therefore arguably a characteristic of terraces within the area.
- 3.2 Furthermore, as discussed below, the retention of the ‘valley’ detail on the roof to the rear will still allow this characteristic to be appreciated and read as a continuation of the terrace.

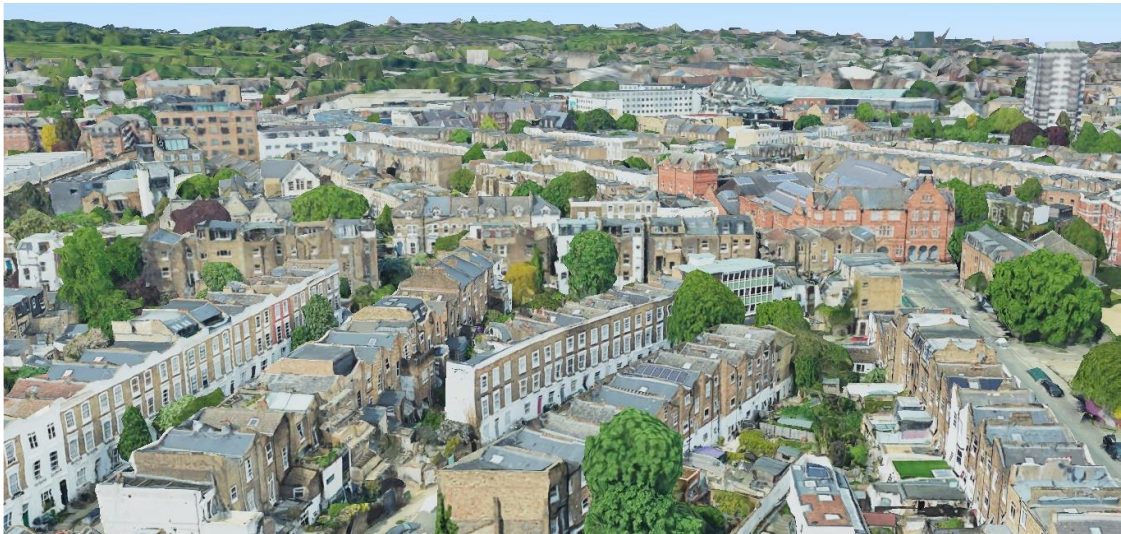


Figure 3: View looking north



Figure 4: View looking east



Figure 5: View looking south



Figure 6: View looking west

4.0 Street Views

- 4.1 The below photographs are street views used by the Conservation Officer in their Delegated Report on the previous application to illustrate the visibility of the roofscape and therefore the proposed mansard.
- 4.2 The accompanying images are of verified views from that same position with the proposed mansard atop. As is evident, the mansard is not visible from the immediate streetscape, or ground level views that have been identified by the Conservation Officer.



Figure 7: Existing long view of western crescent seen from northern junction taken from Conservation Officer's delegated report dated 2022.



Figure 8: Existing long view of western crescent seen from the southern junction taken from Conservation Officer's delegated report, 2022.



Figure 9: Verified View 1, Corner of Grafton Crescent and Castle Road. Proposed mansard roof outlined in blue. (OceanCGI, 2023)



Figure 10: Verified Viewpoint 2, Castle Road opposite Grafton Crescent. Proposed mansard roof outlined in blue (OceanCGI, 2023)



Figure 11: Verified Viewpoint 3, Corner of Grafton Crescent and Castlehaven Road. Proposed mansard roof outlined in blue (OceanCGI, 2023)

5.0 Existing Architectural Context

- 5.1 Below are further examples of other mansard roof extensions within the immediate vicinity of Grafton Crescent.
- 5.2 As identified above, the surrounding area has a varied roofscape including flat roofs, pitched roofs, mansards and modern roof forms. For example, adjacent to No 14 is a relatively modern roof addition, which appears to relate to Apollo Studios. Due to that building's height, scale, and materials (white render, grey windows and perforated metal balustrade), it is significantly more dominant in the street scene than the proposal within this application would be.

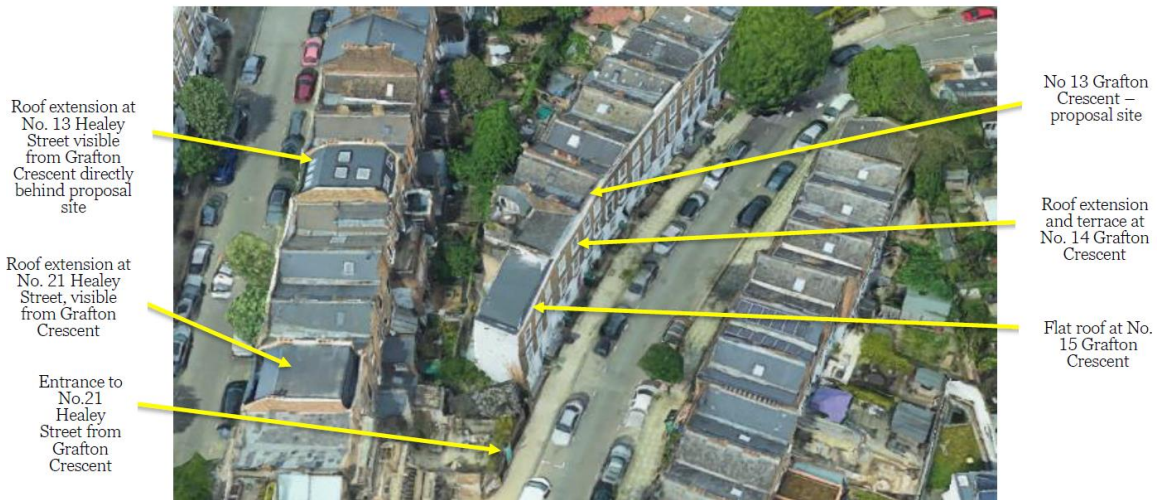


Figure 12: Satellite image showing roof extension and terrace at 14 Grafton Crescent, and the flat roof at 15 Grafton Crescent, the mansard roofs on Healey Street, accessed by entrance doors on Grafton Crescent, are also fully visible at street level from Grafton Crescent.



Figure 13: Photo taken at south end of Grafton Crescent, showing broken valley roof, visible at street level.



Figure 14: Photo taken from Grafton Crescent of fully visible mansard roof (Healey Street address, but with entrance on Grafton Crescent).



Figure 15: Rear elevation of Healey Street, visible from Grafton Crescent. Note the various rear extensions and alterations/extensions to the roof profiles. Previous granted planning permissions have praised the ramshackle nature of the backs of the houses. As a reminder, the proposed construction, will not be visible in any way from public views at street level. It will be subordinate to the host building, and fully traditional in design.



Figure 16: Roof terrace and broken valley adjacent No. 14.



Figure 17: Healey Street with second floor terrace and third floor mansard roof extension as seen from the rear garden of No.13 Grafton Crescent.

6.0 Proposed Scheme

- 6.1 This current application seeks to erect a mansard roof extension to No.13 Grafton Crescent which is locally listed and dates (in part) to the mid-19th Century. A previous application for a rear extension originally included the mansard roof extension however this part was omitted due to concerns over design. The applicants then submitted a second application just for the work to the roof (2022/4000/P) and upon comments received from the Local Planning Authority, have reviewed the proposals and amended accordingly.
- 6.2 The proposals below have addressed the comments and concerns raised by the LPA and is now believed to have taken into consideration all constraints. The drawings below not only illustrate how the application has evolved following on from comments from the LPA, but also illustrates how the clients are keen to ensure that a sensitive yet functional extension which would be in keeping with the character of the building, and importantly the context as a whole, is achieved.
- 6.3 The mansard extension would necessitate the removal of the valley roof form. Although the existing roof is not widely visible, it is an element that reflects the original design of the building. The client has therefore proposed to retain the valley detail at the rear of the building to allow its morphology to remain legible. This alteration to the roof is not considered to detract from the architectural interest or significance of the property as an NDHA.
- 6.4 The accompanying Janus Heritage Statement and Bidwells Heritage Impact Assessment clearly outlines that the significance of the building lies in its front elevation and its group value as part of a terrace. The proposed mansard is not considered to be out of character with the style of the building as there are numerous examples not only within the immediate context, but across London, where mansards have been achieved sensitively in historic locations. The proposals at No.13 Grafton Crescent would be hidden from public view at the front and would only be visible in limited views at the rear.
- 6.5 As seen from the accompanying photos and satellite images above- the roof extension next door at No.14 Grafton Crescent breaks the roof line, as well as the flat roof of No.15- the roofline of the terrace is therefore not considered to be unbroken. The proposed roof extension will unite the random roof extension at No. 14 and set a wonderful example of traditional architectural design for future development.

Appearance and Design

- 6.6 The current proposals at 13 Grafton Crescent have addressed the concerns raised by the council in the previous applications and have:
- Reduced the height of the mansard extension by 670mm.
 - Stepped back the mansard extension by 150mm.
 - Changed the fenestration- reduced in size to reflect the social hierarchy of the floors of the building.
 - Chimney stacks and wall to remain untouched.
 - The materials are in keeping with the character of the local architecture- the exterior is to be dark grey slate whilst the insulation will meet building regulations and sustainability targets.

- 6.7 Due to the set back from the front parapet the mansard roof is no longer visible from the public streetscape of Grafton Crescent, or the viewpoints identified by the Conservation Officer in the previous application (2022/4000/P). Further, due to the intervening built form the proposal will not be visible from the neighbouring streets. This will allow the most significant part of the terrace, arguably the 'uniformity of the front elevations', to still be read as such- uniform.
- 6.8 The design of the roof will be fully sympathetic to the host building, mimicking original Victorian mansards in design, and unlike many surrounding mansards will form a high-quality extension within the crescent and surrounding area.
- 6.9 See Policy Table below to read full assessment of how the design meets local and national policies.

Amount

- 6.10 The area of the proposed top floor extension will be 21m².

Scale

- 6.11 The dimensions of the Mansard Roof extension are as follows:

- Height is 2.65m
- Width is 5.05m
- Length is 5.6m

- 6.12 The existing party walls and chimneys will be retained and not altered, as such the new walls will need to be set in from the existing walls.

Landscaping

- 6.13 No trees will be impacted by the proposed works.

Use

- 6.14 The proposed use is for private, residential purposes.

Ecology

- 6.15 No ecology will be impacted by the proposed works.

Sustainability

- 6.16 In accordance with CPG-H.21 p.t 1, increasing the energy efficiency of the existing building stock in the Borough is a critical component of reaching a NetZero Carbon Future.
- 6.17 The proposed works include measures to conserve natural resources by improving the thermal efficiency of the building envelope. The proposed mansard roof extension will be built from high

quality sustainable materials and to a high standard ensuring low U-values and good thermal performance.

- 6.18 The following are strongly recommended under Camden Planning Guidance:
- **Improved insulation-** The existing valley roof provides poor insulation to the property, resulting in high heating costs and carbon emissions. A survey by British Gas engineers found the property was unsuitable for fitting loft insulation as presently configured, as there is no suitable gap in the loft between the ceiling joists of the top floor and the valley gutter of the roof above. Fitting a mansard roof would resolve this problem and allow for a properly insulated roof.
 - **Solar electricity generation-** The project calls for the installation of photovoltaic solar panels. The mansard would double the roof area suitable for such panels, as half of the existing valley roof faces north and is unsuitable.

Access

- 6.19 Access to the property will remain unchanged as a result of the proposals described above.
- 6.20 A new timber stair will lead from the second floor up to the proposed mansard roof extension.

Highway Considerations

- 6.21 There are no highway consideration relevant to this proposal as the existing access is to be retained.

Trees & Hedges

- 6.22 No landscaping to trees or hedges is proposed.

Flooding

- 6.23 Flooding details on the Environment Agency website have been checked and there are no flooding implications for this site as it located within Flood Zone 1. This means it has a low probability of flooding from rivers and sea. (see Appendix D for further information)

Precedent Planning Applications

- 6.24 Below is a selection of properties in the surrounding streets granted recent planning permission for a mansard roof extension or roof alterations. There are many more examples in the wider borough and of non-locally-listed Victorian houses, such as on neighbouring Healey Street, which becomes part of the visible streetscape of Grafton Crescent.
- 29 Fortress Road 2017/3552/P
 - 58 Hadley Street 2016/4229/P
 - 51 Pratt Street 2017/5151/P
 - 1 Raglan Street 2022/0473/P
 - 21 Healey Street 29-06-2020

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- 23 Healey Street 21-02-2020
- 13 Healey Street 06-09-2019
- 8 Healey Street 04-02-2018
- 11 Healey Street 07-08-2017
- 16 Healey Street 01-09-2016
- 4 Healey Street 03-09-2015

7.0 Proposals



Figure 18: Existing (top) and Proposed front elevation – note the mansard will not be visible from the streetscape.



Figure 19: Rear Elevation – Existing (top) and Proposed – Note the current proposals have been significantly reduced.

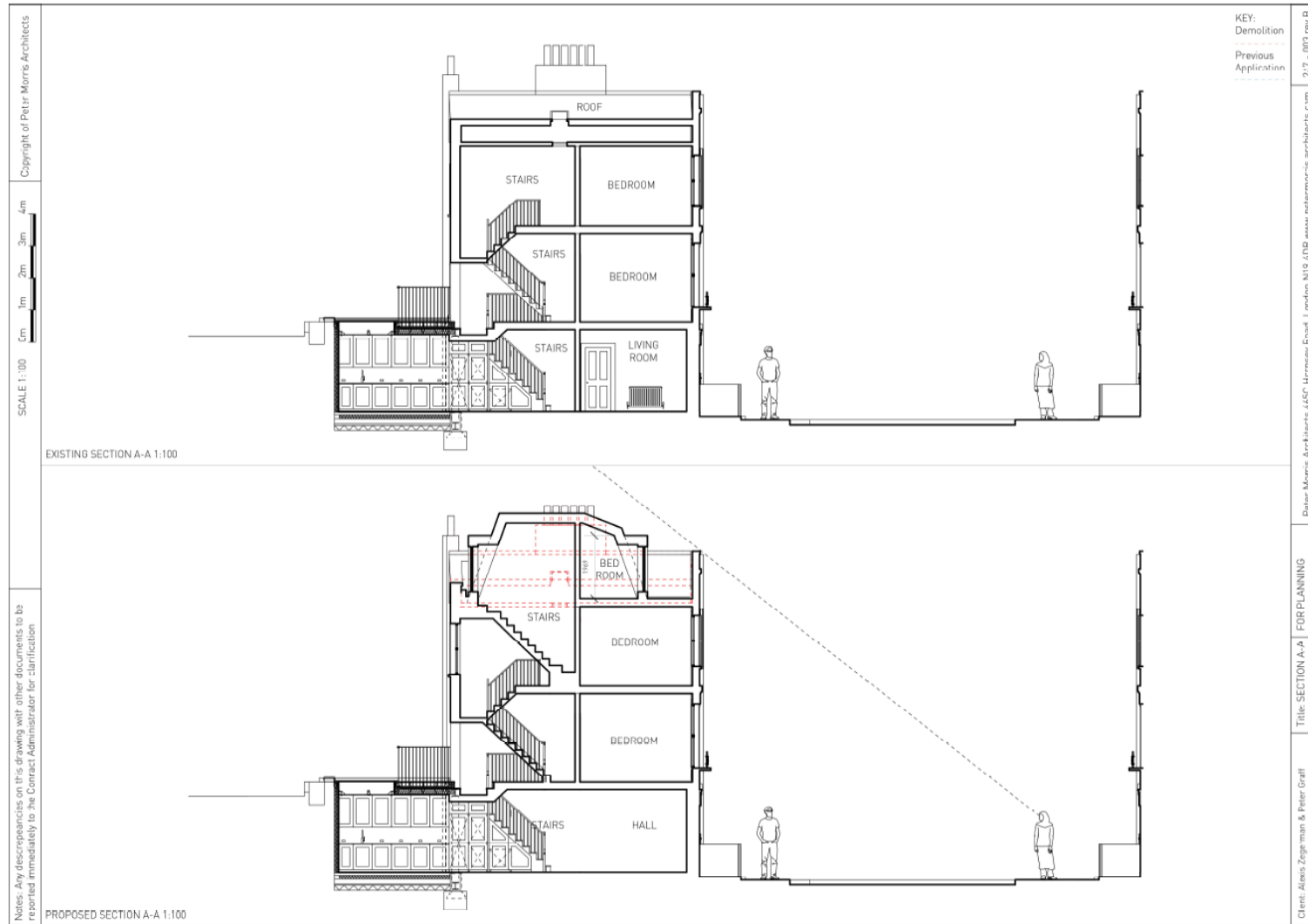


Figure 20: Section Drawing – Existing (top) and Proposed – Note, the proposals have been significantly reduced.

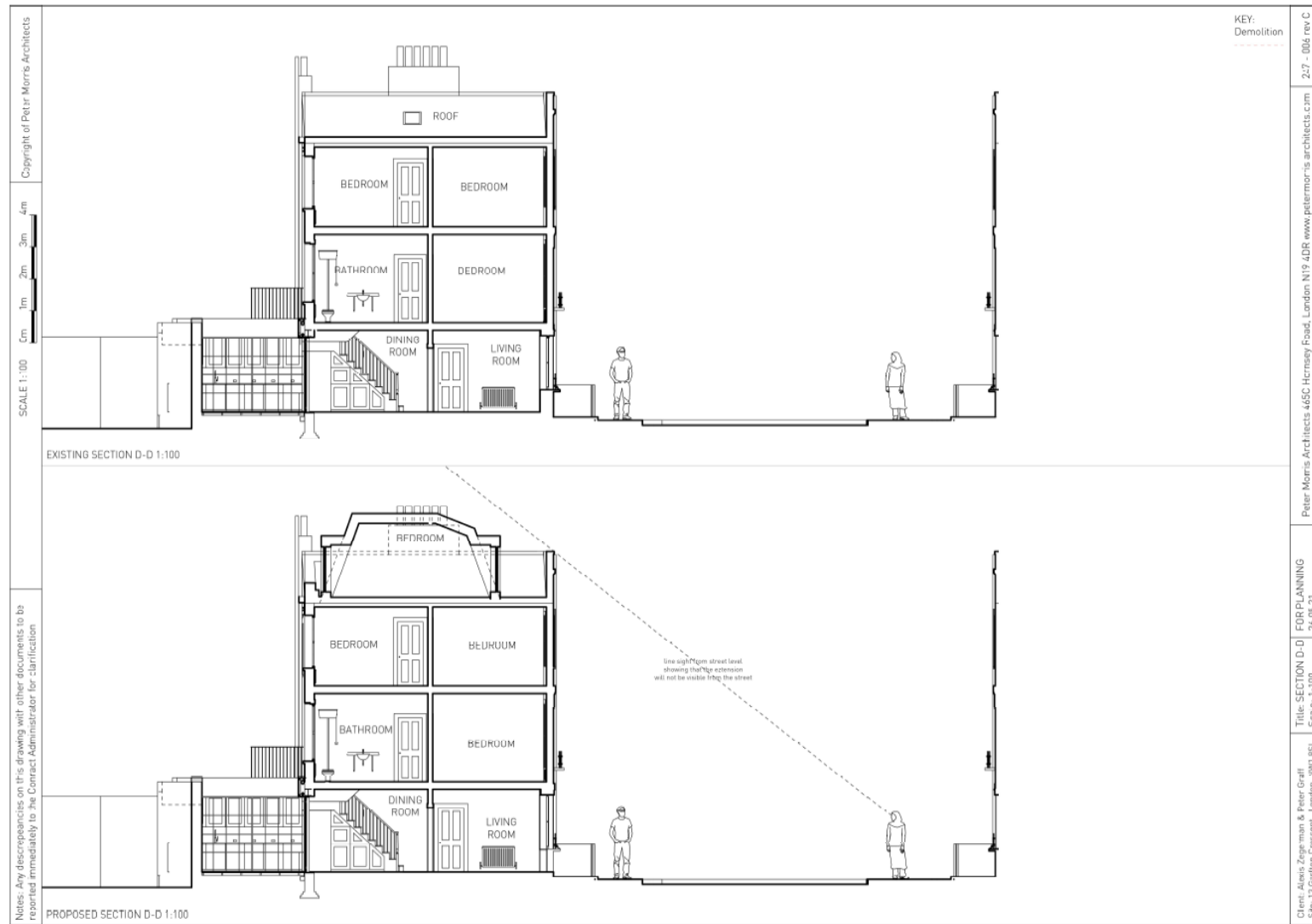


Figure 21: Side Section – Existing (top) and Proposed – Note, due to the setting back of the extension, reduction in height, and the parapet, the proposed mansard roof is not visible from the line of sight from the streetscape.

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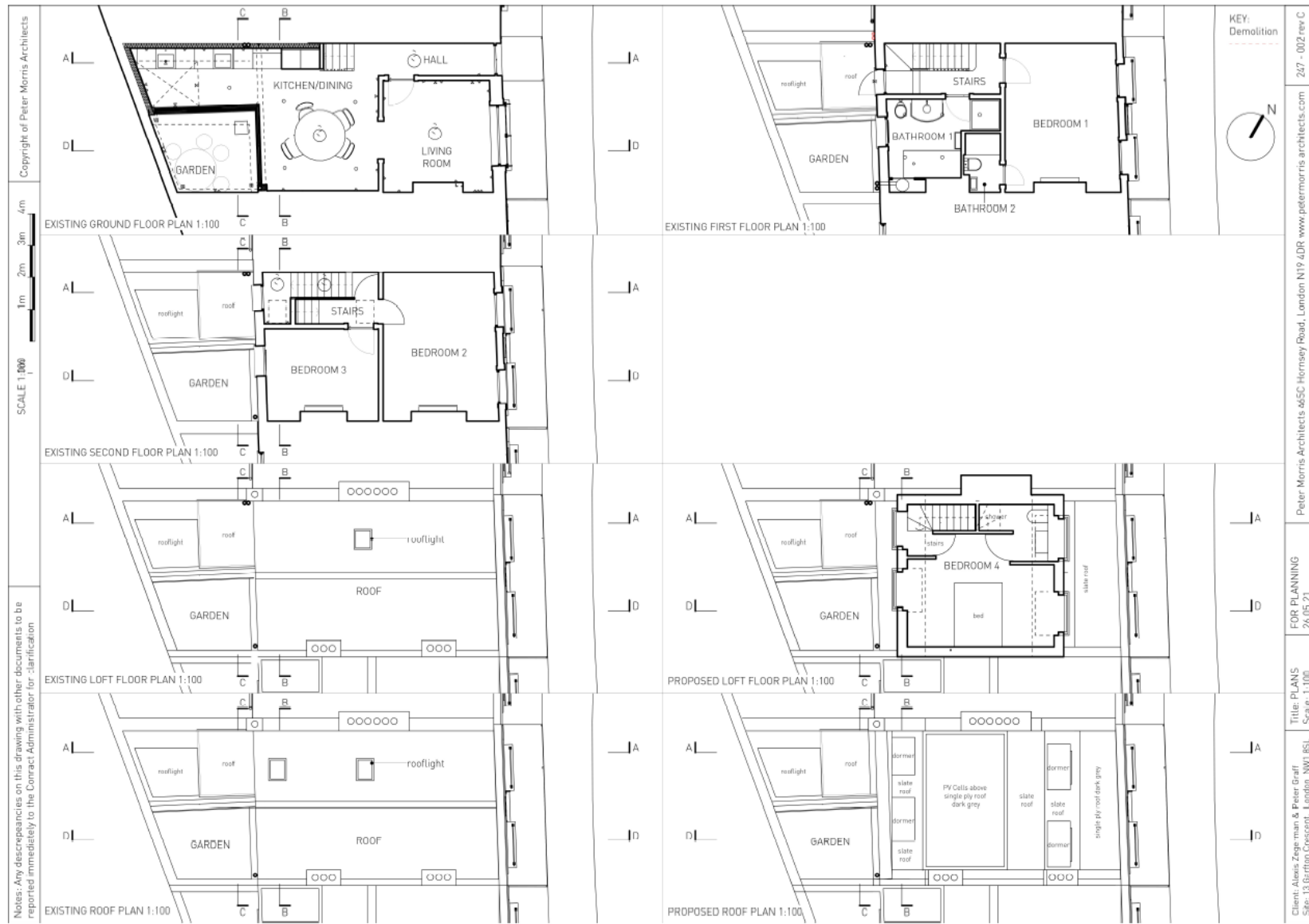


Figure 22: Existing and Proposed Floorplans.

8.0 Planning Policy Table

RELEVANT PLANNING POLICIES		
PLAN	POLICY NUMBER AND TEXT	JUSTIFICATION
<p>London Borough of Camden Local Plan 2017</p>	<p>D1 (Design) The Council will seek to secure high quality design in development. The Council will require that development:</p> <ul style="list-style-type: none"> a. respects local context and character; b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage; c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation; d. is of sustainable and durable construction and adaptable to different activities and land uses; e. comprises details and materials that are of high quality and complement the local character; f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage; g. is inclusive and accessible for all; h. promotes health; 	<p>The proposed design clearly respects the local context and character by:</p> <ul style="list-style-type: none"> • Setting the extension back from the front façade to not disrupt the established unbroken, aesthetic of the terrace. As has been shown, the extension will not be visible from short vistas and long views (identified by the LPA). To the passer-by the terrace will appear unchanged. • Preserving elements of the valley roof to the rear of the building to allow the historic character to remain legible. • Proposing a mansard in what is already a broken roofline (see no. 14 & 15). <p>The materials proposed are of a very high quality and complement the local character whilst also addressing climate change by adapting and incorporating insulation into the property where there is none at present due to constraints within the roof space.</p>

- i. is secure and designed to minimise crime and antisocial behaviour;
- j. responds to natural features and preserves gardens and other open space;
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- l. incorporates outdoor amenity space;
- m. preserves strategic and local views;
- n. for housing, provides a high standard of accommodation;
- and o. carefully integrates building services equipment. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

D2 (Heritage)

Other heritage assets and non-designated heritage assets The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares. 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.

CC2 (Climate Change)

The Council will promote and measure sustainable design and construction by:

The mansard roof extension will provide a high standard of accommodation whilst also providing accessible and inclusive accommodation for the applicant's family.

As outlined in the Heritage Statement the primary significance of the property lies in its architectural uniformity when seen from the front elevation.

In the hierarchy of significance- the roof profile is at the lower end as it is completely obscured by the parapet- which is of higher significance.

The proposals whilst interrupting the roof will not visually change or impact the terrace when viewed from the public streetscape.

Where visible (to the rear of the property) the valley of the roof is proposed to be preserved to allow the legibility of the construction to remain in harmony with a 21st century alteration.

The proposed works include measures to conserve natural resources by improving the thermal efficiency of the building envelope. The proposed mansard roof extension will be built from high quality sustainable materials and to a high standard ensuring low U-values and good thermal performance.

	<p>e. ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation;</p> <p>f. encourage new build residential development to use the Home Quality Mark and Passivhaus design standards;</p> <p>g. encouraging conversions and extensions of 500 sqm of residential floorspace or above or five or more dwellings to achieve “excellent” in BREEAM domestic refurbishment; and</p> <p>h. expecting non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new development from 2019.</p>	
<p>Kentish Town Neighbourhood Plan</p>	<p>Policy D3 Applications for the development of new and the redevelopment of existing buildings (which may include demolition, alteration, extension, or refurbishment) will be supported where they meet the following criteria:</p> <p>a) Proposals must be based on a comprehensive understanding of the site and its context</p> <p>b) Proposals must be well integrated into their surroundings and reinforce and enhance local character, in line with paragraph 64 of the NPPF (shape), scale, height and massing, alignment, modulation, architectural detailing, materials, public realm and boundary treatments</p> <p>d) Design innovation will be encouraged and supported where appropriate</p>	<p>The proposals have clearly taken cues from the local context as mansard roofs are a common feature across terraces in the area.</p> <p>The siting of the proposals has meant that the extension will not be visible from the wider streetscape therefore allowing the established character of the terrace to be preserved whilst also enhancing the buildings use.</p> <p>The design and fenestration are based on the surrounding architectural detailing and will be of a high quality</p>

	<p>e) Design proposals must be of the highest quality and sustainable, using materials that complement the existing palette of materials in the surrounding buildings</p> <p>f) Proposals must enhance accessibility in buildings by taking into account barriers experienced by different user groups.</p> <p>c) Proposals must identify and draw upon key aspects of character, or design cues from the surrounding area. Appropriate design cues include grain, building form</p>	<p>complementing the existing palette of the surrounding buildings.</p>
<p>Camden Planning Guidance Design January 2021</p>	<p>Implication of being a non-designated heritage asset (NDHA) OFFICERS - will make a balanced judgment having regard to the scale of any harm or loss and the significance of the asset/s affected. They will take account of:</p> <ul style="list-style-type: none"> • the desirability of sustaining and enhancing the significance of any non-designated heritage asset/s and putting them to viable uses consistent with their conservation; • the positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality; • the desirability of new development that affects non-designated heritage assets to preserve and enhance local character and distinctiveness. 	<p>To reiterate, by virtue of the scale and massing of the design the proposals will not be visible from the wider streetscape or views allowing the terrace to be read as a continuous uniform group. Thereby preserving and sustaining the most significant part of the building- its front elevation and how that corresponds and sits within the rest of the terrace. The distinctiveness of the valley roof (which is not visible from the public streetscape) will be retained at the rear.</p>
<p>Camden Planning Guidance: Home Improvements January 2021</p>	<p>Roof Extensions It is recommended, to consider the following: The existing roof form and any previous extensions to it;</p> <ul style="list-style-type: none"> • The roof visibility and prominence in relation to gardens, street scene and wider area, considering land topography; • The pattern of development of neighbouring buildings to include historic extensions and new types of development; 	<p>No.14 & 15 which are part of the same terrace and neighbouring No.13 both have different roof profiles and have been altered substantially. Nevertheless, when viewed from the streetscape they are still considered part of the terrace and contribute to its uniform aesthetic even though their roof profiles are varied. These variations have not impacted the significance or character of the terrace due to not being visible from the public streetscape.</p>

	<ul style="list-style-type: none"> • Other roof extensions present at the neighbouring buildings which obtained permission through planning application or permitted development. <p>There are two types of mansard roof extensions: a true mansard</p> <ul style="list-style-type: none"> • (A) and a flat topped mansard (B). In order to be designed successfully, you should follow the details below: • The lower slope (usually 60-70°) should rise from behind the parapet wall, separated from the wall by a substantial set back and gutter; • Retention of roof features such as original cornice, parapet, and chimney stacks; • Windows should respond to the fenestration character of the host building and generally project at right angle similar to a dormer window with timber sash openings; and • Materials to complement the existing roof and building and respond to the neighbouring context. 	<p>The proposals for No.13 will not be visible or prominent from the streetscape and will be wholly subservient to the building. The design has taken cues from neighbouring buildings where there are many examples of mansard extensions.</p> <p>The design will retain the cornice, parapet, chimney stacks, and 'v' profile (at the rear) and will not be visible when viewed from the streetscape.</p> <p>The windows have been reduced in size in line with comments received by the LPA. The materials are of a high quality and positively respond the neighbouring context.</p>
<p>Design Council Building in Context: New Development in Historic Areas</p>	<p>The Right Approach (p.5) A successful project will:</p> <ul style="list-style-type: none"> • relate well to the geography and history of the place and the lie of the land • sit happily in the pattern of existing development and routes through and around it • respect important views • respect the scale of neighbouring buildings • use materials and building methods which are as high in quality as those used in existing buildings • create new views and juxtapositions which add to the variety and texture of the setting 	<p>As outlined, the proposals will sit happily in the pattern of existing development by not visually impacting the uniform views (significance) of the terrace from the front.</p> <p>The proposals will respect the scale of neighbouring buildings by being set back behind the parapet and subservient. The materials and methods are of a high quality.</p>

<p>London Plan</p>	<p>Policy HC1 Heritage conservation and growth</p> <p>A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes, and archaeology within their area.</p> <p>B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:</p> <ol style="list-style-type: none"> 1) setting out a clear vision that recognises and embeds the role of heritage in place-making 2) utilising the heritage significance of a site or area in the planning and design process 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility, and environmental quality of a place, and to social wellbeing. <p>C-Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic</p>	<p>The proposals utilise the heritage significance of the site by integrating the innovative addition of a mansard extension behind the existing parapet. As discussed in the Heritage Statement parapets were historically utilised to hide and obscure elements of the roof structure that would contend with the designed elevations. The proposals are arguably utilising the intended use of the parapet to sustain and preserve the established significance and character of the building.</p>
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	<p>to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.</p>	
<p>National Planning Policy Framework (NPPF)</p>	<p>Chapter 16 ‘Conserving and Enhancing the Historic Environment’. This states that heritage assets should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of existing and future generations.</p> <p>Paragraph 194 states that when determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on that significance.</p> <p>Paragraph 195 identifies that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.</p> <p>Paragraph 197 sets out that in determining applications, local planning authorities should take account of:</p>	<p>A robust Heritage Statement and Heritage Impact Assessment have been produced to accompany this application.</p> <p>The significance of the asset was concluded to lie primarily in the ‘uniform’ architectural detailing of the front elevation and the linear character of the terrace when viewed from the front. The impact assessment concluded that by virtue of the siting and design of the proposals that they would not result in adverse harm to the defined significance.</p> <p>On the contrary, the proposals would sustain the existing aesthetic of the terrace (the mansard will not be visible in short vistas and longer views) and the profile of the valley roof at the rear whilst also enhancing the use and viability of the building as a 21st century family home.</p>

	<ul style="list-style-type: none">• The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.• The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and• The desirability of new development makes a positive contribution to local character and distinctiveness. <p>Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.</p> <p>Paragraph 201 states that where a proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.</p>	
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9.0 Conclusion

9.1 Consequently, the proposals do not conflict with the following policies:

- Policies D3, D4 and HC1 of The London Plan (2021).
- Policies D1 Design, D2 Heritage, A1 Managing the impact of development, Policy CC1 Climate Change Mitigation, Policy CC2 Adapting to Climate Change within the Camden Local Plan.
- Policy D3 Design Principles of Kentish Town Neighbourhood Plan 2016.
- Camden Planning Guidance (CPG) notably their Home Improvements and Design Guide.

9.2 Taken together these, amongst other things, seek to maintain the design quality of development, and to protect the heritage and character of areas, including non-designated heritage assets

9.3 The proposals also do not conflict with the National Planning Policy either, which amongst other things, requires that developments are of a high-quality of design and sympathetic to local character, and that heritage assets are conserved in a manner appropriate to their significance. The proposals are not considered to cause any harm to the significance of the locally listed property.

9.4 The provision for the proposed mansard roof extension is consistent with current Camden planning guidelines and aims to meet the driving principles of high-quality design in the Borough. The overall appearance and scale are subservient to the original building and respects views from surrounding properties. The set back and angle of the front roof slope means that the proposals will not be visible from street level. Retaining the existing front parapet, as well as the rear with its butterfly roof profile. It will provide consistency to the roof line, which has hitherto been broken in the adjacent properties, and will serve as a guiding example for any future developments. In light of these considerations, planning permission should be granted.

APPENDIX 1

HERITAGE LEGISLATION, POLICY AND GUIDANCE SUMMARY

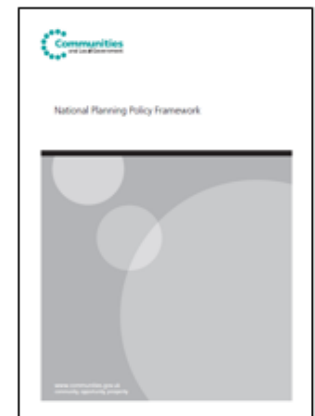
Planning (Listed Buildings & Conservation Areas) Act 1990

The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.

- Section 16(2) states “*In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*”
- Section 66(1) reads: “*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*”
- In relation to development on land within Conservation Areas, Section 72(1) reads: “*Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*”

National Planning Policy Framework (2023)

The National Planning Policy Framework (NPPF) was revised in September 2023. With regard to the historic environment, the overarching aim of the policy remains in line with philosophy of the 2012 framework, namely that “our historic environments... can better be cherished if their spirit of place thrives, rather than withers.” The relevant policy is outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’.



This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a “*manner appropriate to their significance*” (Paragraph 189).

NPPF directs local planning authorities to require an applicant to “*describe the significance of any heritage assets affected, including any contribution made by their setting*” and the level of detailed assessment should be “*proportionate to the assets’ importance*” (Paragraph 194).

Paragraph 195 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, “*to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal*”. This paragraph therefore results in the need for an analysis of the impact

of a proposed development on the asset's relative significance, in the form of a Heritage Impact Assessment.

Paragraph 198 states that local planning authorities should have regard to the importance of the retention '*in-situ*' of a historic statue, plaque, memorial or monument irrespective of its designation. The paragraph goes on to suggest an explanation of historic or social context should be given rather than removal.

Paragraph 199 requires that "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*"

It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, "*clear and convincing justification*" (Paragraph 200). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to 'wholly exceptional' for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.

In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 201 states the following:

"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site; and*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use."*

The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in "*less than substantial harm*", paragraph 202 provides the following:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use."

It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.

In the case of non-designated heritage assets, Paragraph 203 requires a Local Planning Authority to make a “*balanced judgement*” having regard to the scale of any harm or loss and the significance of the heritage asset.

The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.

With regard to Conservation Areas and the settings of heritage assets, paragraph 206 requires Local Planning Authorities to look for opportunities for new development, enhancing or better revealing their significance. Whilst it is noted that not all elements of a Conservation Area will necessarily contribute to its significance, this paragraph states that “*proposals that preserve those elements of a setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably.*”

Broader design guidance is given in Chapter 12, ‘Achieving well-designed places’. The 2021 NPPF introduces the requirement for local authorities to prepare design guides or codes, consistent with the principles set out in the National Design Guide and National Model Design Code Documents. These should reflect ‘local character’ in order to create ‘*beautiful and distinctive places*’ (paragraph 127).

Paragraph 134 states that significant weight should be given to development which reflects local design polices, and/or outstanding or innovative designs which promote high levels of sustainability or help raise the ‘standard of design’ providing they conform to the ‘overall form and layout of their surroundings.

Planning Practice Guidance (PPG) (2019)

The Planning Practice Guidance (PPG) was updated on 23 July 2019 and is a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance.

In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance and explains how the tests of harm and impact within the NPPF are to be interpreted.

In particular, the PPG notes the following in relation to the evaluation of harm: “*in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.*” (Ref ID: 18a-018-20190723).

This guidance therefore provides assistance in defining where levels of harm should be set, tending to emphasise substantial harm as a “high test”.

In relation to non-designated heritage assets, the NPPG explains the following:

“Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.”

It goes on to clarify that: “A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.”

This statement explains the need to be judicious in the identification of value and the extent to which this should be applied as a material consideration and in accordance with Paragraph 197.

Historic England Conservation Principles: Policies and Guidance 2008

Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of the historic environment, including changes affecting significant places. It states that:

“New work or alteration to a significant place should normally be acceptable if: a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place; b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed; c. the proposals aspire to a quality of design and execution which may be valued now and in the future; d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future” (page 59).



Historic England Making Changes to Heritage Assets Advice Note 2 (February 2016)

This advice note provides information on repair, restoration, addition and alteration works to heritage assets. It advises that *“The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting.”* (page 10)

Historic England Managing Significance in Decision Taking in the Historic Environment Historic Environment Good Practice Advice (GPA) in Planning Note 2 (March 2015)

This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include: *“assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.”* (page 1)

Historic England The Setting of Heritage Assets Historic Environment Good Practice Advice (GPA) in Planning Note 3 (Second Edition) (December 2017)

This document presents guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas and landscapes. Page 6, entitled: '*A staged approach to proportionate decision taking*' provides detailed advice on assessing the implications of development proposals and recommends the following broad approach to assessment, undertaken as a series of steps that apply equally to complex or more straightforward cases:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes

Historic England Analysing Significance in Heritage Assets Advice Note 12 (October 2019)

This document provides guidance on the NPPF requirement for applicants to describe heritage significance in order to aid local planning authorities' decision making. It reiterates the importance of understanding the significance of heritage assets, in advance of developing proposals. This advice note outlines a staged approach to decision-making in which assessing significance precedes the design and also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements.

The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. This advice also addresses how an analysis of heritage significance could be set out before discussing suggested structures for a statement of heritage significance.

Regional Policy

The London Plan (2021)

The London Plan was adopted in March 2021, the following policies are relevant to heritage and this application.

Policy D1 London's form and characteristics

- A. *Development Plans, area-based strategies and development proposals should ensure the design of places addresses the following requirements:*

Form and layout

- 1) *use land efficiently by optimising density, connectivity and land use patterns*
- 2) *enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions*

Quality and character

- 12) *respond to the existing character of a place by identifying the special and valued features that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute to the local character*
- 13) *be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.*

Policy HC1 Heritage conservation and growth

- A. *Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.*
- B. *Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:*
- 1) *setting out a clear vision that recognises and embeds the role of heritage in place-making*
 - 2) *utilising the heritage significance of a site or area in the planning and design process*
 - 3) *integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*
 - 4) *delivering positive benefits that sustain conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.*

Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets

and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Local Policy

The Camden Local Plan (2017)

The Camden Local Plan was adopted on 3rd July 2017, the following policies are relevant to heritage and this application.

Policy D1 Design

“The Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character;*
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- d. is of sustainable and durable construction and adaptable to different activities and land uses;*
- e. comprises details and materials that are of high quality and complement the local character;*
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
- m. preserves strategic and local views;*
- n. for housing, provides a high standard of accommodation; and*

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”

Policy D2 Heritage

“The Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. In order to maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area;*

Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

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.”

Kentish Town Neighbourhood Plan (2016)

The Kentish Town Neighbourhood Plan was adopted on 12th June 2016, the following policies are relevant to heritage and this application.

Policy D3 Design Principles

“Applications for the development of new and the redevelopment of existing buildings (which may include demolition, alteration, extension or refurbishment) will be supported where they meet the following criteria:

a) Proposals must be based on a comprehensive understanding of the site and its context

b) Proposals must be well integrated into their surroundings and reinforce and enhance local character, in line with paragraph 64 of the NPPF

c) Proposals must identify and draw upon key aspects of character, or design cues from the surrounding area. Appropriate design cues include grain, building form (shape), scale, height and massing, alignment, modulation, architectural detailing, materials, public realm and boundary treatments

d) Design innovation will be encouraged and supported where appropriate

e) Design proposals must be of the highest quality and sustainable, using materials that complement the existing palette of materials in the surrounding buildings”

APPENDIX 2

LOCAL LIST DESCRIPTION

7-13 (odd) and 16-26 (even) Grafton Crescent

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.



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