Printed on: 30/01/2024 09:10:13

Application No:	Consultees Name:	Received:	Comment:
2023/5141/P	Henry Gomm	29/01/2024 10:59:07	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 front and rear dormer windows.

This follows the refusal of a recent application (ref. 2023/1580/P) for the erection of a mansard roof extension which was rejected on the grounds that the proposal, by reason of its principle, 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. This echoes the reasons for refusal of the previous application (ref. 2022/4000/P) for a rear extension and mansard roof extension.

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 209 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.

Although harm is not identified by the applicant, the visual impact assessment submitted with the application stipulates that the proposals will be visible from longer distance views which may reveal its presence to a degree (paragraph 4.8). This includes however is not limited to views from Castle Road. It is therefore questionable to conclude that no harm to the significance of the non-designated heritage asset will result of the proposed mansard extension given its incongruous nature. Instead, the applicant should acknowledge that the proposals may lead to some harm, although at the lower end of less than substantial and apply the statutory tests accordingly. Should officers conclude that any such harm is identified, paragraph 209 of the NPPF applies.

It is noted in the officers' 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. The conclusions of the report are

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consistent with the previous assessment (ref. 2023/1580/P) whereby the principle of a mansard roof extension is not an appropriate form of development for this location and therefore the current scheme should also be refused accordingly.

Design

The Design and Access Statement submitted with the application states that due to the set back from the front parapet, the proposals will no longer be visible from the public streetscape of Grafton Crescent. However, the mansard extension would necessitate the removal of the valley roof form (an element that reflects the original design of the building) and unite the 'random roof extension' at No. 14 Grafton Crescent (paragraphs 6.3-6.5). 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.

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 and modulation of the surrounding area and therefore contrary to Local Plan Policy D1 (Design) and Kentish Town Neighbourhood Plan Policy D3. Furthermore, the proposed roof extensions would conflict with the requirements of Paragraph 5.8, disrupting the unbroken run of valley roofs of Grafton Crescent, disregarding the symmetry and legibility of the group listing.

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 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.

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				Conclusions	
				Whilst the revised scheme is considered less visible in nature than that previously refused, the proposals still fail to address the harm to the unbroken roofline of the locally listed terrace. We therefore request that you refuse the application as the scheme fails to comply with the Local Plan Policies D1 (Design) and D2 (Heritage), and Kentish Town Neighbourhood Plan Policy D3.	
				It is respectfully suggested that the proposed mansard roof extension, by reason of its design 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.	
				Please contact my colleague, Michael Lowndes, or myself should you have any queries on the above or wish to discuss our representations.	
2023/5141/P	C Kennedy	29/01/2024 17:31:30	COMMNT	Dear Camden Planning,	
				I am emailing regarding the planning application for address 13 Grafton Crescent, London NW1 8SL.	
				Myself and my husband live on Healey Street, backing onto Grafton Crescent. We are two doctors with small children and recognise the importance of being able to extend properties to allow for families like our own and the family at 13 Grafton Crescent to remain in the area as our children grow and need more space and independence.	
				We are aware that a number of local primary schools have recently closed, as families are priced out of living in the area. It is a great sadness. This is where I grew up, a place famous for its diversity and its culture. But as families choose to leave for more space and quality of life, the area loses its youth and it's vibrancy, making it less of a community melting pot that makes it so unique.	
				For this reason we would like to express our support of these works - this is a family of five who would inevitably benefit from extending their property. We do not feel that the work will negatively impact on our own property, and think works like this that support families to stay in the area are really important.	