Corrected version:

I would like to respond to the comments made by Gemma Shore in a message dated 21/1/2024, in which she cites the National Planning Policy Framework in support of her application for a roof extension to the Highcroft flats (2023/3274/P). The passages she references do not, in fact, support the planning application, for the following reasons:

1) Paragraph 70 of the NPPF, to which she refers, appears in a section of the report titled “Identifying Land for Homes.” This section calls for policy makers to undertake “a strategic land availability assessment,” including the assessment of brownfield registers, to identify possible sites for new construction. This section of the Framework (paragraphs 69-74) is concerned with the development of new sites for the construction of new housing. It is not concerned with the construction of extensions or additions to existing properties in already dense areas of development, such as that proposed for the Highcroft flats.

2) Ms. Shore refers to Paragraph 124e of the NPPF, quoting its endorsement of “opportunities to use the airspace above existing residential and commercial premises for new homes.” As has already been pointed out by several commentators on this planning application, the proposed roof extension does not provide any new homes; it only extends existing ones. Ms Shore also cites the Framework’s recommendation that mansard roof extensions should be allowed “on suitable properties where their external appearance harmonises with the original building.” However, she omits the footnote to the salient phrase “suitable properties.” This footnote refers a reader to the NPPF’s glossary for further details (page 72). The glossary’s detailed definition of a mansard roof is drawn from a briefing paper titled “Create Streets, 2021, Living Tradition.” (See link here.) This document offers a detailed analysis of when the construction of new mansard roofs can be appropriate. Crucially, however, the paper is concerned with the addition of mansards to buildings from the Georgian and Victorian eras, in which the mansard roof was a common feature, not with modern buildings whose architectural style is wholly different: its author writes, “it should be stressed that this proposal only applies to the kind of flat-fronted houses with parapets where such mansard extensions are wholly historically appropriate if designed well” (p.15). The Highcroft building lacks the kind of parapet characterised by this definition; the construction of a mansard is not “historically appropriate,” given the building’s modernist style. In a section devoted to “building eligibility” (definition 17, p. 22), the Create Streets paper gives a more detailed account of the kind of historical buildings to which a mansard extension may be appropriate. Among the relevant criteria is that the building in question “was built after 1700 and before 1918.” (The document adds, “Alternatively the Government may wish to extent eligibility to 1948 to cover suitable terraced and parapeted buildings from this period.”) The Highcroft flats, whose construction dates from the 1960s or 1970s, are clearly not eligible for a mansard extension, even under the more liberal allowance cited here. Far from supporting Ms. Shore’s application, then, the paragraph she cites from the National Planning Policy Framework actually does the opposite: it demonstrates that the proposal is historically inappropriate and should be rejected according to the NPPF’s own definitions.

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