



Planning & Heritage Statement

Planning Application for Mansard Roof Extension and associated works.

4th Floor Flat
31 Gloucester Avenue
London
NW1 7AU

January 2019

[2164/EPCH/](#)

London Borough of Camden

1. Introduction

- 1.1. This planning statement has been prepared to support a full planning application and listed building consent for the extension of the existing mansard roof of the 4th floor flat at number 31 Gloucester Avenue, London, NW1 7AU.
- 1.2. Documents submitted in support of the application include:
 - Site Location Plan
 - Existing floor plan
 - Existing elevations
 - Existing section
 - Proposed floor plan
 - Proposed section
 - Proposed Illustrative Massing Visual
- 1.3. It is acknowledged that Planning Permission and Listed Building Consent have previously refused on the site (LPA ref: 2018/1123/P and 2018/1682/L). The proposal has been altered since this time and this application seeks to overcome the previous reasons for refusal.
- 1.4. It is noted that there is an existing dormer extension on the terrace however, there are inconsistencies with its numbering in a variety of documents. The Historic List Entry description refers to it as number 16, the Design and Access Statement for the previous application refers to it as number 15 and the Officer's Report for the previous application refers to it as number 17. For the avoidance of doubt it will be referenced as number 17 throughout this document.

2. Site Context and Designations

- 2.1. The fourth floor flat at 31 Gloucester Avenue is located within a 19th century listed 4 storey terrace with basements. The terrace at Gloucester Avenue (and surrounding 19th century terraces) has been altered over time as various internal and external changes have been made to create individual dwelling units, including the fourth floor flat at number 31, which is located at roof level on the end terrace.
- 2.2. The ridge line of the terrace is relatively consistent with the exception of Flat 17 which has undergone a roof extension and has street facing dormer windows. Flat 31 is the product of an extension which also alters the roof line marginally, although this is not readily visible from street level.
- 2.3. The GIA of the flat is currently 29m² and therefore does not comply with the nationally described space standards. The owner is keen to extend the flat to improve the quality of living conditions.
- 2.4. Gloucester Avenue runs immediately adjacent to the southern boundary of the terrace. The site is situated in an area readily accessible via a range of public transport modes.

Heritage

- 2.5. Heritage considerations are a key part of this proposal. The terrace in which the flat is located is situated within the Primrose Hill Conservation area in Camden which was designated in 1971 with its associated Conservation Area Statement adopted in 2000.
- 2.6. The property is also grade II listed (Historic England listing number: List entry Number: 1342069). The list description for the terrace is as follows and it was first listed in 1974:
- 2.7. The list entry states:

"Gloucester Avenue Nos. 15-31. Terrace of 9 houses. C1848. Yellow stock brick with rusticated stucco ground floors and quoins. No. 16 with felted mansard roof and attic dormers. Symmetrical terrace with slightly projecting end houses (Nos 17 and 31) and central houses (Nos 21 & 23). 4 storeys and basements. 2 windows each. Prostyle Doric porticoes; doorways with fanlights and half glazed doors. No. 15,

entrance converted to a window. Ground floor sashes tripartite. 1st floor, gauged brick flat arches to casements with continuous cast-iron balcony. 2nd and 3rd floors, gauged brick flat arches to recessed sashes. Stucco dentil cornice at 3rd floor level. Parapet above 3rd floor. INTERIORS: not inspected."

- 2.8. The listed terrace is wholly in residential use, split into a series of flats/apartments. The building is not without alteration, as aforementioned there are roof extensions to number 15 and number 31 (the subject site) which were permitted historically..

Planning History

- 2.9. **2010/3544/P and 2010/3549/L** - Upper Ground Floor Level at No.31 Gloucester Avenue. Removal of window at upper ground floor level to the rear elevation and installation of French style doors and an open-work metal stair for access to the communal garden of the residential dwelling - Granted - 31/08/2010.
- 2.10. **2018/1123/P and 2018/1682/L** - 4th Floor Flat No.31 Gloucester Avenue. Planning Permission and Listed Building Consent sought for the erection of mansard roof extension with front dormer windows, formation of rear terrace with glass balustrading, replacement of existing rear door/balcony with new window and associated internal alterations - refused - 06/06/2018.

3. The Proposal

- 3.1. The application is for an extension to the existing fourth floor flat at roof level of no.31. The proposed extension will be faced with slate to match the existing and surrounding buildings of Gloucester Avenue. Two new flush windows are proposed replacing the existing fenestration detailing on the front elevation, these new windows better assimilate with the rest of the terrace and align with its symmetry. They will be made of timber to match the existing.
- 3.2. The proposed extension is 10m² increasing the GIA of the flat from 29m² to 39m². The proposed width is 5.5m, height 2.4m and width 1.7m.
- 3.3. This is compared to the previous application which had a width of 5.5m, a depth of 2.9m, and height of 2.7m, all of which have been reduced as part of the current application.
- 3.4. Access, waste storage and removal to the site remains unchanged.
- 3.5. The terrace is flanked by comparable terraced properties, and has an inherently residential context. Neighbouring properties do not experience any loss of amenity by way of overlooking or creation of an overbearing appearance, the extension sits neatly between the existing raised party walls.
- 3.6. The 2018 application made clear that the previous proposal was inappropriate in terms of its height, position, bulk and detailed design. It was considered to be a highly prominent and incongruous alteration to the roof form and which would detract from the external appearance of number 31 specifically, and the wider terrace.
- 3.7. The applicant has taken this issues into account when preparing the revised proposal seeking to ensure there is an almost discernable level of visual intrusion. This is clearly evidenced by the proposed massing pictures submitted to accompany the application.
- 3.8. The amends are summarised below:
 - Reduced scale and height of the extension, the ridge heights and eaves now remain comparable to the existing;
 - Omission of the proposed front terrace retaining comparable visual impacts to the existing and alleviating the threat of visible domestic paraphernalia;

- Retention of a large proportion of the remaining the butterfly roof as a key historic feature and architectural detail of the terrace;
- Use of flush rather than dormer windows to minimise visual intrusion and assimilate better with the surroundings
- Omission of rear inset terrace, glass balustrading and replacement of rear door/balcony. This means that the rear elevation remains unchanged and views of the wider terrace from the rear remain unaltered

3.9. All of this has been achieved whilst moderately increasing the size of forward extension - offering gains towards national space standards. Appropriate living conditions are essential for the general health and well-being of residents of the borough and the wider London area and beyond. Achieving minimum levels of floor space allows for sustainable housing provision in the long term creating housing stock which offers flexible accommodation choices and can adapt to the changing needs and lifestyles of the population.

3.10. The proposal will not appear out of keeping in the area given it is an extension to an existing flat, furthermore the nature of the 3 + storey buildings in the area means it will not have an major impact on the street scene and appear out of keeping in any event.

3.11. Overall, key features of the roof line and references in the CA appraisal are to be retained as part of the proposal.

Key Considerations

3.12. With reference to the above, we understand the key consideration to be the impact of the extension to the existing mansard roof on the Conservation Area and its setting and the grade II listed building on which it sits. Design and amenity considerations are also relevant.

3.13. Consideration of these heritage of impacts have directly influenced the proposed scale, form, detail and massing of the proposed extension design.

4. National & Local Planning Policy

- 4.1. The Planning (Listed Buildings & Conservation Areas) Act 1990, section 72 imposes a duty on the LPA to consider whether the proposals preserve or enhance the character or appearance of the area. Section 66 considers the LPA's duty to listed buildings (without prejudice to section 72) and states they 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.
- 4.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that decisions must be made in accordance with relevant Development Plan Documents unless material considerations indicate otherwise.
- 4.3. The relevant local policy documents which have been considered include: Camden Local Plan (2017), Camden Planning Guidance (adopted/updated 2018), Primrose Hill Conservation Area Statement (2000) – (Character and Appearance of the Area – [Sub Area One - Regent's Park Road South] & Guidelines - Roof Extensions), The London Plan (2016).
- 4.4. The National Planning Policy Framework (2018) and associated Guidance are also a material consideration in decision making. These documents refer to the requirement for the impact of development on the significance of heritage asset to form the basis of assessment in decision making.
- 4.5. The policies most pertinent to the determination of this application are set out below.

The Camden Local Plan (2017)

- Policy D1 Design
- Policy D2 Heritage

Camden Planning Guidance 2018

- CPG 1 Design (Sections 2, 3, & 5)
- CPG Amenity (Sections 2 & 3)

Primrose Hill Conservation Area Statement (2000)

- 4.6. The Primrose Hill Conservation Area Statement describes no's.15-31 as a grand terrace of listed houses with stucco detailing. The terrace is made up of buildings that are four storeys, with basements, and are narrow in width, with two windows to each floor. They are discretely designed to form symmetrical compositions. This symmetry is

achieved through variations in form and decoration at the centre and/or ends of the terrace, including projecting sections and arrangement of porches.

- Policy PH18 roof extensions and alterations
- Policy PH19 roof extensions and alterations

The London Plan (2016)

- Policy 7.4 Local Character
- Policy 7.6 Architecture
- Policy 7.8 Heritage Assets and Archaeology

The National Planning Policy Framework (NPPF) (2018)

- **Chapter 16** conserving and enhancing the historic environment
 - Paragraph 189
 - Paragraph 193
 - Paragraph 196
- **Chapter 12** Achieving Well Designed Places

5. Planning Policy Considerations

5.1. This section of the planning statement sets out an analysis of the proposal with reference relevant planning policy as set out in the preceding chapter. The key points of consideration are as follows:

- **Design & Heritage**
 - The impact of the proposal on the listed building
 - The impact of the proposal on the Conservation Area
 - Public Benefits Generated from the Proposal
- **Amenity**

Design and Heritage

5.2. The site is situated on the roof of a grade II listed terrace at 15-31 Gloucester Avenue, within the Camden Conservation Area. Issues of design and heritage are the most relevant to the proposal.

5.3. Policies **D1** and **D2** of the Camden Local Plan require new development to be of high quality design which integrates well with its surroundings, preserves/enhances the historic environment and utilises high quality materials. This is echoed in policies **7.4** and **7.6** of the London Plan which consider the importance of local character and the use of appropriate architecture in new development.

5.4. London Plan Policy **7.8** and chapter **12** of the NPPF note the importance of heritage assets being preserved in a manner appropriate to their significance. Chapter **196** of the NPPF requires a balancing exercise weighing up the less than substantial harm of a development to a heritage asset, against the public benefits of the proposal.

5.5. The below assessment will demonstrate how the proposal is in accordance with the general thrust of the associated design and heritage policies to create a new development which assimilates well with its surroundings drawing upon key historic features. It then undertakes the public benefits test regarding less than substantial harm to a heritage asset.

The impact of the proposal on the listed building

5.6. As aforementioned, the flat is a set back roof extension to no 31 Gloucester Avenue, it sits within the wider grade II listed terrace at 15-31 Gloucester Avenue. The listing description describes the building as a symmetrical terrace with slightly projecting end and central houses - including number 31 on which the existing rooftop flat sits. It then sets out the specific fenestration and design details.

- 5.7. The key historic and design features are seen in the symmetrical composition of the building, the presence of butterfly roofs with set back parapets and the quality and consistency of the design at the ends and the middle of the terrace. These key elements have been considered and retained in the main as part of the proposal. The proposed materials have been selected to ensure they harmonise with the character and appearance of the listed building, whilst offering higher levels of sustainability and durability. This is shown through the use of slate as the principle building material. It is a natural product which is highly durable, can be easily recycled and requires little to no maintenance once inserted so is very cost effective.
- 5.8. The existing roofline remains largely unaltered. Exceptions include
- 1) a mansard roof extension at no.17 which is clearly visible above the parapet and from the street below and
 - 2) the historic extension at roof level of number 31 to form the fourth floor flat although this is only visible in longer distance views.
- 5.9. The visual impact of this existing extension at no.17 has been considered by the applicant and used as a design cue to ensure the proposed extension does not alter the roof line in such a way or extend as far forwards. Currently, the fourth floor flat at no.31 is set back from the roof and retains an element of the original butterfly roof form. This will remain the case in this proposal ensuring key views from the street scene and wider distance views remain largely unaltered. .
- 5.10. The proposal omits the front terrace area proposed as part of the original application which would have resulted in the loss of the remaining butterfly roof form. It also omits the previously proposed dormer windows which the council felt visually dominated the roof. Instead flush windows are proposed within the set back elevation ensuring that the extension remains visually subservient.
- 5.11. Overall, the proposal represents a cut back scheme from the original submission. The extension will not appear as an additional prominent roof top feature, is modest in nature and retains the majority of the butterfly roof. The reduction in the height and scale of the proposal means there will be a barely discernible visual change from the existing situation and it will remain a subordinate feature to the main terrace. Overall, it is deemed to represent less than substantial harm to the listed terrace.

The impact of the proposal on the Conservation Area

- 5.12. The Primrose Hill Conservation Area Statement also notes the symmetrical composition of the terrace and how this contributes to its architectural and historical significance making an important contribution to the Conservation Area.

- 5.13. The Primrose Hill Conservation Area Policy **PH18** addresses roof extensions and alterations and notes that those which change the shape and form of the roof, can have a harmful impact on the Conservation Area. It then lists a series of criteria which would make roof extensions and alterations unacceptable. These considerations are also largely echoed in the Council's CPG1 Design Guidance.
- 5.14. Conservation Area Policy **PH19** states that in applying the PH18 criteria it is concluded that, roof extensions and alterations at 15-31 Gloucester Avenue would be unlikely to be acceptable.
- 5.15. However, it is a material consideration that this proposal is for an extension to an existing roof level mansard and therefore it is not considered to fall foul of these criteria. Furthermore, the changes proposed are so minimal they would not be clearly discernible from what exists already from street level or further distance views and the existing skyline would remain largely unchanged.
- 5.16. Although part of the significance of the terrace relates to its symmetrical composition, the proposal will not upset the balance of this given that it is a proposed extension to an already existing roof alteration.
- 5.17. The extension does not contribute to symmetry of front elevation, read as main facade. It is noteworthy however that the two new windows proposed on the front elevation continue the symmetry of the existing fenestration detailing of the terrace below, allowing them to assimilate better than the current situation.
- 5.18. The existing extension although visible from longer distance views is not considered to be a prominent feature. The proposed extension is modest and will not change this. The minor extension will be largely indiscernible and views of the property in the short and longer distance will be largely unimpacted. Within the context of the surrounding buildings which are 3+ storey height, the existing does not appear out of context or visually incongruous. This will remain the case with the proposed extension given its modest scale and set back nature.
- 5.19. Overall, the visual impact on the skyline and, alterations to the roof form, are minimal and do not cause significant harm. The proposed extension will not appear as a visually prominent or incongruous addition to the roofline and the blend of materials assimilates the addition into the existing context. This is clearly evidenced in the accompanying illustrative massing visual which has been submitted as part of the application (Drawing title: Elevation and Massing Proposed).
- 5.20. The proposal will preserve the character and appearance of the conservation area.

Public Benefits

- 5.21. As set out in both local and national policy, great weight should be given to the protection of heritage assets. Where a development proposal will lead to less than substantial harm to the heritage asset as identified in this application, this harm should be weight against the public benefits of the proposal including, where appropriate, securing its optimum viable use (Local policy D2, NPPF para 156).
- 5.22. It is further noted that the public benefits generated should be proportionate to the level of public benefit generated from the existing asset. Currently, this is only achieved in viewing the property from the street and longer distance views as there is no public access to the building.
- 5.23. The proposal adds value to the significance of the listed terrace due to its high quality design and materials proposed, taking design cues from the historic surrounds.
- 5.24. The impact on remaining original roof fabric is minimal.
- 5.25. The proposal will also help secure the optimum viable use of the asset, which is wholly in residential use. Currently, the GIA of the dwelling is 29m2 and the proposal will increase it to 39m2. Although a personal benefit will be gained by increasing floorspace for the applicant, this proposal offers the opportunity to bring the flat more akin to the required national space standards, which for a one bedroom, one person, one storey dwelling are 39m2 GIA. It has been broadly acknowledged that there are clear links between substandard housing and poor physical and mental health. This can create onset issues to the labour market due to sick leave or long term unemployment.
- 5.26. The 'human element' of planning and the ability to improve the applicants quality of life and subsequent housing standards come into play, with the proposal assisting in the longevity of the flat and how it can be more efficiently utilised into the future.
- 5.27. Prominent frontages and elevations are a key feature of the heritage asset along with, the symmetry of centre and end terrace detailing and projection forwards. This is not impacted by the proposal and how the public experience the asset from street level will remain unchanged.
- 5.28. In addition there would be some temporary economic benefits generated during the period of construction. The project will likely be completed by a local builder/tradesmen offering job creation and support for small and medium sized

enterprises, as supported in the NPPF. These public benefits should be given some weight.

- 5.29. Overall, it is considered in this instance that the less than substantial harm identified as part of the proposal, is outweighed by the public benefits identified above. The proposal is therefore in accordance with Local Plan Policy **D2** (heritage) along with **Chapter 8** of the NPPF and policy **7.8** of the London Plan which seek to protect the historic environment by requiring development to be sympathetic to and conserve heritage assets significance.

Amenity

- 5.30. Issues of amenity are not relevant to the proposal given the raised and set back nature of the proposal. It will preserve the current and future occupants and neighbours amenity in terms of privacy, outlook, sunlight and overshadowing.
- 5.31. It is noted that officers concluded that the previous proposal resulting in no overlooking or amenity impacts. This conclusion can be reached for this amended proposal which is cut back from the front elevation and omits the previously proposed roof terrace to the front. The proposal is therefore in accordance with Local Plan Policy **A1** and Camden Planning Guidance on Amenity at sections **2 and 3**, which seek to ensure development does not cause unacceptable amenity issues with neighbours and occupiers.

Conclusion

- 5.32. We are of the view that in depth analysis of the significance of the heritage assets, the application of the associated NPPF tests and consideration of the design and sustainability aspects, demonstrates that the proposals accord with national and local plan policy.
- 5.33. In light of the above considerations, it is respectfully requested that the application is approved.