

Planning and Heritage Statement

4th Floor Flat, 31 Gloucester Avenue, London NW1 7AU

Firstplan Ref: 20353/KM/cs

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Section 1 Introduction

- 1.1 This Planning and Heritage Statement has been prepared by Firstplan on behalf of our client, Dr Ian Hart, in support of planning and listed building consent applications to replace the existing roof extension to the Fourth Floor Flat at 31 Gloucester Avenue, London NW1 7AU.
- 1.2 No. 31 Gloucester Avenue comprises an end terraced townhouse, of mid-Victorian period, which has been subdivided into flats and has an existing modern roof extension.
- 1.3 The property is part of a grade II listed terrace, comprising Nos. 15-31 and is located within the Primrose Hill Conservation Area.
- 1.4 Previous applications for larger roof extensions at the application site have been refused on the basis of the impact on the appearance of the listed building and terrace and the character and setting of the Conservation Area.
- 1.5 The proposals within this revised application have sought to comprehensively mitigate against such concerns, by reducing the size of the extension, and ensuring that the chimney stacks remain prominent. The proposals represent a visual improvement when compared with the existing extension and additionally propose the removal of the prominent handrail at roof level. Given the existing extension, it is considered that the scheme will cause no harm to the significance of the listed building or character and appearance of the wider conservation area.
- 1.6 The proposals therefore represent an appropriate method in which to improve the current living arrangements of the existing flat.
- 1.7 This statement fulfils the requirement outlined within the National Planning Policy Framework (NPPF) (2019), which necessitates the significance of the designated heritage asset to be explained in order to highlight any impacts which may arise from the proposed development which may in turn affect the significance of the heritage asset. This report will therefore assess the impacts of the proposals both on the host building and the conservation area.
- 1.8 The Statement assumes the following structure:
 - **Section 2** provides the site description alongside the planning history for the site;

- **Section 3** sets out the legislative and policy context;
- **Section 4** assesses the significance of the heritage assets in question;
- **Section 5** outlines the proposals and evaluates the planning and heritage considerations pertinent to the application; and
- **Section 6** draws conclusions.

Section 2 Background Information

a) Site and Surrounding Area

- 2.1 The application site comprises the 4th floor flat located within a roof extension to an end terrace mid-Victorian townhouse situated on the southern side of Gloucester Avenue, close to the junction with Regents Park Road. The original property has four storeys, with a lower ground floor level.
- 2.2 The existing roof extension is clad in timber to the front and grey tiles to the rear. It features casement windows to the front and rear and French doors to the rear with a glass balustrade.
- 2.3 The existing 4th floor flat is considered significantly cramped, with a total floorspace of only 27sqm. The dwelling comprises a combined kitchen/living room, bedroom measuring 5.37 sqm and bathroom.
- 2.4 The proposal site is grouped together with Nos. 15-31 as Grade II Listed and is within the Primrose Hill Conservation Area. The terrace features stucco at the lower and upper ground floor levels with stock brick above alongside render/stonework quoin, cornice and parapet detailing and timber sash windows.
- 2.5 Of significance, No.15, within the same listing grouping, has a substantial roof extension with front facing dormer windows.
- 2.6 The surrounding area is residential, with commercial establishments located along the principle A4201 road and Delancey Street. The railway line is situated to the east of the site, running south-eastwards to north-westwards.
- 2.7 The site benefits from excellent transport connectivity, with a PTAL rating of 5.

b) Planning History

i) The application site

- 2.8 The most recent planning history relates to the refusal of planning and corresponding Listed Building consent applications, *2019/0468/P* and *2019/1216/L*, on 24th July 2020 which sought permission for:

“Enlargement of mansard roof extension at fourth floor level”.

2.9 The design of the extension comprised an increase of the mansard roof to align with the prominent chimney stack.

2.10 The application was refused on one ground; namely, in relation to concerns over the height, position, bulk and design of the proposed extension which the officer deemed as too dominating and would undermine the external character and appearance of the listed building and wider terrace group alongside the character and setting of the Conservation Area.

2.11 An earlier scheme was refused on 6th June 2018, under refs *2018/1123/P* and *2018/1682/L*, which involved:

“Erection of a mansard roof extension with front dormer windows, formation of rear inset terrace with glass balustrading, replacement of existing rear door/balcony with new window and associated internal alterations”.

2.12 This design featured an extension of the mansard roof to align with the front parapet.

2.13 In a conscious effort to mitigate against the previous reasons for refusal, the scheme submitted under this application is a reduced extension which is set back from the existing chimney stacks.

2.14 Other works to the host dwelling entail *2011/0115/P* which granted permission for alterations to the fenestration of the ground floor flat in March 2011. Corresponding Listed Building Consent was also granted at this time for internal and external alterations in terms of fenestration, under *2011/0116/L*. The installation of French style doors and an open-work metal stair for access to the communal garden was enabled via applications *2010/3544/P* and *2010/3549/L* in August 2010. Further, the erection of a single-storey garage adjacent to existing garage at the residential dwelling was granted consent in July 2006, ref *2006/2302/P*.

ii) Neighbouring properties

2.15 Permission was granted was granted in January 2010 for a scheme at 83 Gloucester Avenue, ref: *2009/2868/P* which includes a mansard with a rear roof terrace. Although this property is not statutorily listed, it is within the Conservation Area and is of a very similar architectural style: a Victorian mid terrace four storey house of traditional brick, stucco and timber frame construction with a butterfly roof concealed behind a parapet. The terrace ‘79-85 odd’ is listed in Policy PH19 of the Conservation Area Appraisal as being a location where roof extensions and alterations which alter the shape of the

roof are unlikely to be considered acceptable. Whilst there were other examples along the street, Nos. 79 - 85 had no other mansard extensions at this time.

2.16 It is also noted that permission was granted in April 2018 for the erection of a roof extension with front dormers and rear roof terrace with balustrade to create additional habitable space for the dwellinghouse at 85 Gloucester Avenue, ref 2017/7094/P.

2.17 It is also noted that Nos. 90 – 100 Gloucester Avenue (even) are listed within in Policy PH19 of the Conservation Area Appraisal as being a location where roof extensions and alterations which alter the shape of the roof are unlikely to be considered acceptable. However, subsequent to this policy:

- 98 was granted consent for a mansard in 2005 (ref: 2005/2448/P)
- 92 was granted consent for a mansard in 2009(ref: 2009/4105/P)
- 96 was granted consent for a mansard in 2014 (ref: 2014/6219/P)

2.18 It is also noted that Nos. 110 – 150 Gloucester Avenue (even) are also listed within in Policy PH19 of the Conservation Area Appraisal. However, all the properties apart from Nos. 130 and 136 now have mansards. In particular, No.140 of this group was granted consent despite it being visible from the corner of King Henry's Road and Regents Park Road (ref: 2010/0265/P).

Section 3 Scheme Description

- 3.1 The application scheme proposes to replace the existing roof extension to create an enlarged extension which will project 1200mm forward of the existing extension.
- 3.2 The new extension will allow for additional living space and will upgrade the fabric of the unit so that it is better insulated and more thermally efficient.
- 3.3 The extension will be clad with natural slate tiles to the front and rear with a grey roof covering. New fenestration to the front façade includes 2 no. symmetrical flush windows. To the rear there will be a glass door with Juliet balcony. Three rooflights will be installed including 1 no. rooflight to the main living space area, 1 no. rooflight to the bedroom and 1 no. rooflight to the kitchen area.
- 3.4 To the front of the extension the existing butterfly roof form will be retained.
- 3.5 The handrail to the front parapet will be removed.

Section 4 Legislative and Planning Policy Context

a) Legislation

- 4.1 When considering the implications of proposals on heritage assets, regard must be attributed to Sections 66 (1) and 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“The Act”).
- 4.2 Section 72 (1) of the Act stipulates that when considering whether to grant planning permission for development which affects buildings or land in a conservation area or its setting, the Local Planning Authority should have special regard to the desirability of preserving the building or its setting, or indeed, any features of special architectural or historical interest which it possesses. “Preserving” relates as doing no harm.

b) National Planning Policy Framework (NPPF) (2019)

- 4.3 This document, updated in February 2019, provides the overarching policy guidance for England whereby sustainable development is regarded as a fundamental principle. Decision makers should grant consent for proposals that accord with current development plans.
- 4.4 Section 12 discusses achieving well-designed places; **Paragraph 127** requires proposals to function well and add to the overall quality of the area whilst featuring good architecture and layout that is sympathetic to the local character and history.
- 4.5 Section 16 sets out guidance in relation to conserving and enhancing the historic environment; **Paragraph 184** requires heritage assets to be conserved in a manner proportionate to their significance. When determining planning applications affecting heritage assets, **Paragraph 189** requires applicants to describe the significance of any heritage asset implicated, including any contribution made by their setting. The degree of details should be proportionate to the asset’s importance, with no more than necessary to understand the potential impact on their significance.

4.6 **Paragraph 192** states that in determining applications, local authorities should consider:

- 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 making a positive contribution to local character and distinctiveness.

4.7 Further, **Paragraph 196** requires proposals that will lead to less than substantial harm to the significance of a designated heritage asset to be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

c) **The London Plan**

4.8 The London Plan (2016) provides the strategic overall goal for London in terms of the social, economic, environmental and transport framework.

4.9 Of note, **Policy 7.4** concerns the local character of an area; proposals should have regard to the function of an area and build on the positive aspects that can aid in establishing an enhanced character for the future function of an area. **Policy 7.6** requires architecture to make a positive contribution to a coherent public realm, streetscape and wider cityscape. Further, **Policy 7.8** sets out that heritage assets must be maintained and protected in order to maximise their potential within the community; the policy states:

Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

d) **Local Policy**

4.10 The statutory development framework for the application site comprises the Camden Local Plan (2017), the Proposals Map and the Site Allocations Plan (2013). Planning guidance includes: The Design SPD (2018) and the Altering and Extending Your Home SPD (2019). The Primrose Hill Conservation Area Statement (2000) has also been considered.

i) Camden Local Plan (2017)

- 4.11 This document provides the framework for development within the Borough up until 2031.
- 4.12 **Policy A1 Managing the Impact of Development** strives to protect the quality of life for occupiers and neighbours. Permission will be granted unless unacceptable harm to amenity is induced.
- 4.13 **Policy D1 Design** ensures that development is of the highest quality. As such, proposals must respect the local context and character whilst preserving or enhancing the historic environment and any heritage assets. Designs should incorporate sustainability and be of a durable construction. Details and materials of the development should complement the local character. Proposals should also integrate well with neighbouring streets and be inclusive and accessible for all. Strategic and local views should be protected. In terms of residential development, proposals must incorporate a high standard of accommodation.
- 4.14 **Policy D2 Heritage** stipulates that Camden's rich and diverse heritage assets, including their settings, are protected; the Council will not permit the loss of or harm to a designated heritage asset. Moreover, the Council require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. In order to preserve or enhance Listed Building, the Council will resist development that would cause harm to the significance of a listed building through an effect on its setting.

ii) Camden Planning Guidance: Altering and Extending your Home (2019)

- 4.15 Section 4 discusses roofs, terraces and balconies; roof alterations are likely to be considered acceptable whereby the alterations are architecturally sympathetic to the age and character of the building and maintain the integrity of the overall roof form. Dormers should be appropriately sized so as to be subordinate to the main roof.
- 4.16 The dormer and window should relate to the façade below and be aligned with windows below. The guidance further states that materials should complement the main building and the wider townscape and the use of traditional materials such as timber, lead and hanging tiles are preferred. Roof lights should be sized so as to be significantly subordinate both in size and number and should be fitted flush with the roof surface.

iii) Camden Practice Guidance: Design (2018)

- 4.17 This document provides guidance in relation to Camden's heritage assets; development within Conservation Areas must preserve, and, where possible, enhance the character and appearance of the area.
- 4.18 In relation to listed buildings, the document outlines how proposals will be evaluated on a case by case basis in order to consider the individual features of a building, its historic significance and the cumulative impact of small alterations. Original or historic features are expected to be retained, with repairs completed in matching materials. Applications for listed building consent must demonstrate how the proposed works are necessary.
- 4.19 The document further stipulates that roof extensions are unlikely to be deemed acceptable which impact to a large extent on the skyline and where there is an adverse impact on the appearance of the building or the surrounding street scene.

iv) Primrose Hill Conservation Area Appraisal and Management Strategy (2000)

- 4.20 The Primrose Hill Conservation Area Appraisal and Management Strategy provides background information on the history and character of the area. It also sets our guidance policies for the area.
- 4.21 **Policy PH18** of the Conservation Area Statement confirms that roof extensions and alterations, which change the shape and form of the roof, can have a harmful impact on the Conservation Area. As such, proposals will not be supported where:
- It would be detrimental to the form and character of the existing building;
 - The property forms part of a group or terrace which remains largely, but not necessarily completely, unimpaired;
 - The property forms part of a symmetrical composition, the balance of which would be upset;
 - The roof is prominent, particularly in long views and views from the parks;
 - The building is higher than many of its surrounding neighbours.
- 4.22 **Policy PH19** stipulates that roof extensions and alterations which change the shape and form of the roof are unlikely to be acceptable at a whole range of properties across the conservation area. This wide ranging list includes 1-35 odd Gloucester Avenue. Along Gloucester Avenue it also includes Darwin Court, Electricity sub stations, 36, 39-63 odd, building between 42 and 44, 44, The Engineer Public House

(65), 67-77 odd, 79-85 odd, where several roof extensions have been permitted as detailed in Section 2 of this report.

Section 5 Assessment of Significance

a) Character of the Conservation Area

- 5.1 The Primrose Hill Conservation Area Statement (2000) confirms that the Conservation Area was first designated in October 1971, with a subsequent extension to incorporate the northern part of Erskine Road in June 1985. The location is described as residential in character with a series of well-laid out Victorian terraces; the area was also noted as hosting local industries, a school and ample green space.
- 5.2 The land comprising the Conservation Area is predominantly made up of land owned by Lord Southampton, land to the north and west was in ownership by Eton College, with land to the south previously owned by the Crown Estate.
- 5.3 In 1840 the Southampton Estate was sold off for development, with development occurring sporadically throughout the decade. Owing to the expense of the nearby railway line, simple terraces were erected along Gloucester Avenue and surrounding streets.
- 5.4 The application site lies within the Sub-Area 1: Regent's Park Road South which is predominantly occupied by residential uses. Gloucester Avenue features grand terraces with limited stucco detailing that are four storeys with basements and are narrow in width with two windows to each floor. The terrace is noted as discreetly designed to form symmetrical compositions. The properties along Gloucester Avenue have a small front garden area with a low brick wall.
- 5.5 Gloucester Avenue, along with Regent's Park Road and Albert Terrace, forms part of the planned suburban 19th Century Southampton Estate and is referred to as being of a consistently generous width with wide pavements and gently curving forms.
- 5.6 Mansard roof extensions are a common feature in the conservation area, including along Gloucester Avenue where there are numerous examples, including relatively recent consents as detailed in Section 2 of this report.

a) Contribution of the Application Site

- 5.7 The Listing for Nos. 15-31 is provided below:

“Gloucester Avenue Nos. 15-31. Terrace of 9 houses. C1848. Yellow stock brick with rusticated stucco ground floors and quoins. No. 16 [No. 15] 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.” [Corrections added]

(Historic England, Listing No. 1342069)

- 5.8 The property has since been sub divided into 6 flats; subsequently the rear of the terrace features several ground floor and basement extensions, with many of the original windows having been replaced.
- 5.9 31 Gloucester Avenue has significance as part of the planned suburban 19th Century Southampton Estate. Externally, it is an attractive property which has architectural value and contributes positively to the conservation area.
- 5.10 However, the existing roof extension detracts from the listed building. In particular, the use of red timber and casement windows are at odds with the architecture of the property.

Section 6 Assessment of Impact

- 6.1 The key planning consideration in this case is the impact of the proposals on the listed building and wider conservation area.
- 6.2 Prior to considering this it is worth noting that:
- The proposals will improve the living standards of the currently cramped dwelling. The floor area of the 4th floor flat is considered sub-standard, measuring only 27sqm.
 - There will be no harm to the amenity of neighbouring occupiers. This was confirmed by officers in the assessment of the previous applications.
 - The proposed extension will be significantly more sustainable than the existing extension including improved insulation.
- 6.3 The revised scheme has specifically sought to address the previous reasons for refusal, by reducing the size of the proposed extension and ensuring that the chimneys remain prominent. By retaining a greater amount of the historic roof form and reducing the prominence of the extension when it is glimpsed in long views it is considered that there is no harm to the listed building or wider conservation area.
- 6.4 It is understood that PH19 of the Conservation Area Appraisal stipulates that roof extensions and alterations which change the shape and form of the roof are unlikely to be acceptable at 1-35 odd Gloucester Avenue. However, in this case there is an existing roof extension which has been in place for many years. The proposals simply seek to improve on this existing situation whilst enhancing the existing flat.
- 6.5 Given the existing roof extension, and that it is now only proposed to extend by 1.2 metres further forward, the proposals are in accordance with PH21 of the Conservation Area Appraisal as the extension is hidden from view behind a parapet to the Gloucester Avenue street elevation.
- 6.6 The existing inappropriate materials comprising red timber with casement windows will be replaced with dark grey tile, dormer windows and roof lights appropriate for the conservation area. The amendments to the existing roof extension will provide for a more symmetrical and aesthetically pleasing appearance. This represents a visual improvement which is a public benefit of the scheme.

- 6.7 Furthermore, the existing handrail to the front parapet will also be removed, which will enhance the appearance of the property.
- 6.8 The extension has been significantly reduced in scale so that it is set back from the front of the chimneys, ensuring that they remain prominent in the street scene. The existing chimney stacks were regarded as an important architectural feature in consideration of the last application and therefore this directly addresses the previous reason for refusal.
- 6.9 As demonstrated in the submitted Design and Access Statement, the extension, although visible from longer distance views, is not considered to be harmful to the character of the area given the existing extension is already visible, the proposed set back behind the front of the chimneys and the visual improvement it represents compared with the existing extension.
- 6.10 Hence, it is contended that the proposals accord with the NPPF, London Plan and Policies D1 and D2 of the Camden Local Plan, which require development proposals to be of high-quality design which marry with the surroundings and preserves/enhances the historic environment through utilisation of high-quality materials.
- 6.11 Overall, the extension enables a better standard of accommodation to be provided, enhances the sustainability of the building fabric, results in an enhanced visual appearance when compared with the existing extension, retains more of the historic roof fabric than the previous applications and retains the prominence of the existing chimneys.

Section 7 Conclusions

- 7.1 This application is a revised scheme which seeks planning permission and listed building consent for a replacement roof extension to the 4th floor flat at 31 Gloucester Avenue, London NW1 7AU.

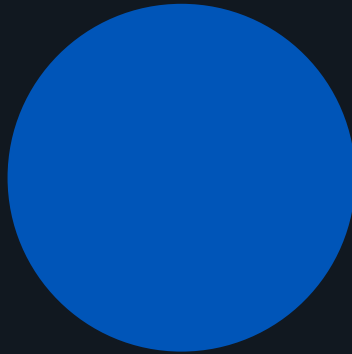
- 7.2 In order to mitigate against previous reasons for refusal, the proposed scale of the extension has been reduced in scale and results in an increased depth of just 1200mm. As such, the extension is modest in scale and entirely subordinate to the property. The remaining butterfly roof form is retained and the chimneys will remain prominent.

- 7.3 The extension will use high quality materials and will enhance the appearance of the property when compared with the existing extension.

- 7.4 Moreover, the small extension will significantly improve the standard of living accommodation provided by the flat.

- 7.5 Subsequently, it is contended that the remodelled roof extension will not harm the special character of the listed building and would sufficiently preserve the character and appearance of the conservation area.

- 7.6 Ergo, we respectfully request that planning and listed building consent is granted.



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