

# Appeal to secure full planning permission

## *Statement of case*

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London NW1 9AN



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## 1. Introduction and background

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This Appeal Statement has been prepared to address the reasons for refusal cited by the London Borough of Camden ("the Council") in the Local Planning Authority's (LPA) decision notice (Ref: 2020/5142/P) dated 5th January 2021 proposing an application by owner/occupier of Flat 2<sup>nd</sup> Floor, 9 Cliff Road, London NW1 9AN for the erection of a new roof-top extension.

The LPA description states "*Erection of roof extension with terrace to front*". Planning application was refused with the reason of:

*"The proposed roof extension, by reason of its bulk, form, design and location on an unimpaired roofline, would result in harm to the character and appearance of the host building, its wider building group within Cliff Road and the Camden Square Conservation Area, contrary to policies D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017"*

This appeal refutes the reasons for refusing to grant planning permission for this development proposal and the full statement of case is carefully and thoroughly set out in this statement. I believe that LPA in this instance did not fully engage with the application nor consider the proposal on its merits and the statement of case is presented below.

## 2. Background and context

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The application site is 9 Cliff Road. The property is not listed and is a Share of Freehold. The property was originally built between 1885 and early 1900 and is located within the Camden Square Conservation Area.

The area is identified as making a positive contribution to the character and appearance of the Conservation Area. To the North side of Cliff Road there are a number of raised semi-detached villas in an early victorian Classical-Italianate style. The rhythm of the terrace is interrupted by the modernist revivalist building of Cliff Studios. On the opposite side of the Cliff Road (and outside the Conservation Area boundary) are the 1930s LCC Camelot house flats.

Despite the subtle differences in the treatment of house elevations there are a number of recurrent themes: asymmetrical compositions, canted bays, large slab chimneys and white painted timber casement and sash windows.

The buildings in the local area are generally semi-detached properties which are closely built with small access gaps between them. Small gardens are provided to the front with larger more generous gardens to the rear. The gardens are sub-divided between properties with brick walls and timber fencing.

No. 9 Cliff Road is located between a modern commercial property and a continuous terrace of properties, 10-15 Cliff Road. Previous appeal decision (APP/X5210/W/18/3210011) agrees that *“the architecture on Cliff Road and in the conservation area generally is not uniform”*

The delegated report cites ‘the application site belongs to a building group that comprises no.10-15 Cliff Road’. 10-15 Cliff Road were originally three semi-detached properties. At some point the access gaps have been bridged over with an infill development creating the appearance of a continuous terrace of six properties; this infill development configuration is not typical in the local area. In addition to the manipulation of the facade the ‘London’ roofs were adapted to facilitate the infill development. The party wall and chimney stacks, that originally separated the dwelling houses, have been removed to facilitate the alternations without due consideration for the existing building fabric and a flat roof bridges between properties. The roof alterations remain concealed behind the front parapet; however are much more visible from the back of the properties as recognised in the previous appeal (APP/X5210/W/18/3210011): *“the existing rear elevation roof form of Nos. 8 and 9 does differ from Nos. 10-15 and the group is less clearly defined when viewed from the rear”*

### 3. Relevant planning history

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There were 2 previous planning applications relevant to the site in question

The planning application to 9 Cliff Road only (2016/2694) was refused on the grounds that:

‘The proposed roof extension, by reason of its design, form, bulk and location in a roofscape largely unimpaired by later additions, would result in harm to the character and appearance of the building, the terrace of which it forms part and this part of the Camden Square Conservation Area, contrary to policy CS14 (Promoting high quality places and conserving our heritage) the London Borough of Camden Local Development Framework Core Strategy; and policies DP24 (Securing high quality design) and DP25 (Conserving Camden's heritage) of the London Borough of Camden Local Development Framework Development Policies.’

A subsequent appeal was dismissed (APP/X5210/W/16/3160504).

Following a review of the appeal decision both neighbouring owners, to no.8 & 9 Cliff Road, have jointly entered into a dialogue to secure planning approval.

A fully considered strategy has informed the design proposal (2018/2323/P) which was refused permission dated 17 July 2018 for the same reason as above. A subsequent appeal was dismissed (APP/X5210/W/18/3210011).

In both cases appeal has focused on the merits of the application and concluded that proposals “*would harm the character and appearance of the conservation area*” and “*would appear as an incongruous roof form*” because “*the additional height is likely to appear incongruous when viewed from Camden Park Road*” and “*the now proposed extension may still be visible in longer oblique views*” hence adding additional height and bulk to the property.

Taking the feedback from the 2 previous planning decision notices and appeal decisions into account a third planning application was made (Ref: 2020/5142/P) to address the concerns raised but again refused by the LPA. It was materially different in scale and content from the previous two applications. It is worth noting that none of the adjoining properties submitted an objection to the planning application and there was previous local support for the proposed schemes.

I believe that in their refusal LPA have not fully engaged with the proposal nor constructively considered the new application.

#### 4. Statement of case

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The single reason for refusal by the LPA relates to the proposed roof extension in terms of its design, bulk and siting on an unimpaired roofline. The Council considers that the proposed scheme would be detrimental to the character and appearance of the host building, the wider building group and the Camden Square Conservation Area.

Despite attempts to establish a dialogue with the LPA it was not successful. Procedural guide for Planning Appeals states that:

*“1.3.1 The local planning authority should have constructive discussions with the applicant and, if it has any concerns, give the applicant the opportunity to amend the application before it is decided”*

However, the first and only corresponding from the LPA was in the form of decision notice and a covering note from Planning Officer stating:

*“I attach the decision notice and officer report <...> The principle of additional height on the roof remains unacceptable regardless of the reduced massing.”*

It appears that in Officer's view any roof extension is unacceptable no matter specifics of the design or the proposal - which is contrary to Camden's Policy DP25 concerning Conservation Areas which aims to *“permit development within conservation areas that preserves and enhances the character and appearance of the area”*. In the statement of case I argue that the proposed extension does not bear any impact on the conservation area and as such fully preserves its character and appearance whilst providing improved amenity in line with the London Plan's goal of *“enabling growth and change, while also supporting the retention of London's heritage and distinctiveness”*. I also believe that LPA failed to fully engage with the proposal - I would respectfully request the Inspector to find favour with the logical, sensitive, and private residential investment proposal and to uphold the Appeal.

Without repeating the reasoning and arguments made in the Design and Access Statement as part of the original application which I believe still fully apply, I will address the decision notice and the reasons provided for the refusal.

The main reason for refusal is stated as:

*“The proposed roof extension, by reason of its bulk, form, design and location on an unimpaired roofline, would result in harm to the character and appearance of the host building, its wider building group within Cliff Road and the Camden Square Conservation Area, contrary to policies D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017”*

The building and its immediate context are unique:



Figure 1. Bird-eye view of 9 Cliff Road roofline.

The Delegated Report reveals that the application may not have received the due diligence necessary. It appears the planning department has determined the application without a full understanding of the material changes to the application as compared to the previous applications lodged for the same site.

The Council's reason for refusal is identical to the reason for refusing previous planning applications. The current design proposal is significantly different in terms of the design particularly with regard to the scale, massing and visual composition - it is a drastically more modest design with a significantly reduced height and footprint.

The most important difference is that the new proposal is fully concealed within the existing parapet walls of the host building and is imperceptible in all street level public views including any oblique, angled or distant views. It has been carefully designed to completely hide the bulk of the extension from view and as such would have no harm or impact to the character or appearance of the host building.

As such LPA reason for refusal is not applicable to the application in question. Despite not being perceivable at street level, the proposed extension is thoughtfully designed to respect the host building and respond appropriately in townscape terms using the traditional mansard forms and materials minimising the impact of any additional glazing.

Council's assessment fails to acknowledge this very significant difference although it's clearly indicated in the Design and Access Statement and detailed plans attached with the application. I find the LPA's lack of engagement with the strategy and the authority's apparent disregard toward the latest scheme design disappointing.

In case a site visit would not be possible below are photos illustrating this main argument above - taken from the exact locations of what would be the most prominent 2 points of the proposed structure.



Front of the building:

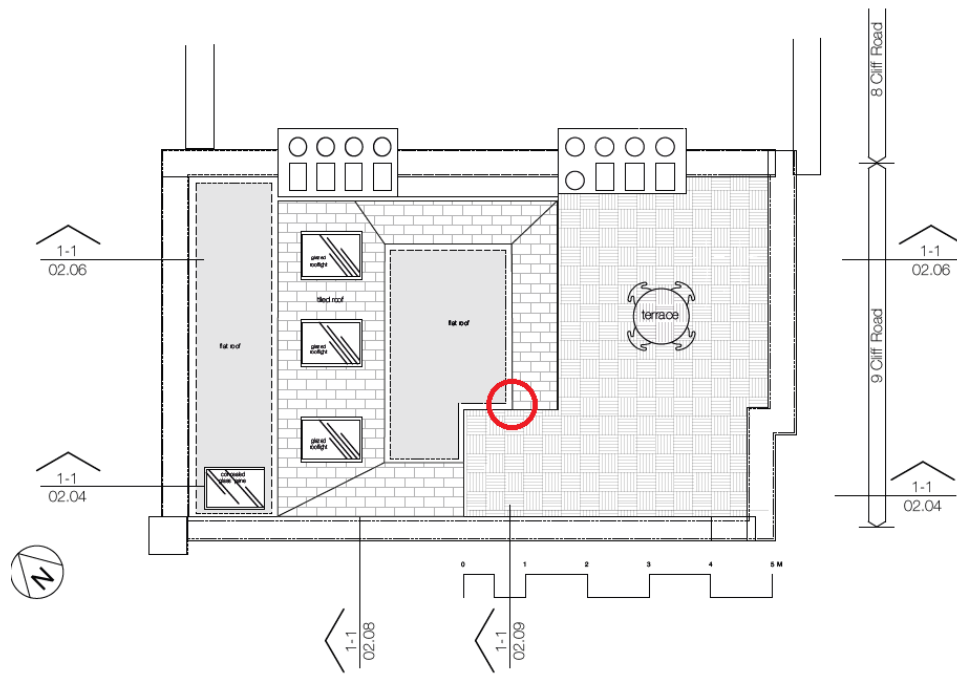


Figure 2. Photo location for front of the building



Figure 3. Towards Cliff Road and Camden Park Road



*Figure 4. Towards Cliff Road and Cliff Villas*



*Figure 5. Towards 8 Cliff Road and Cliff Studios*



Back of the building:

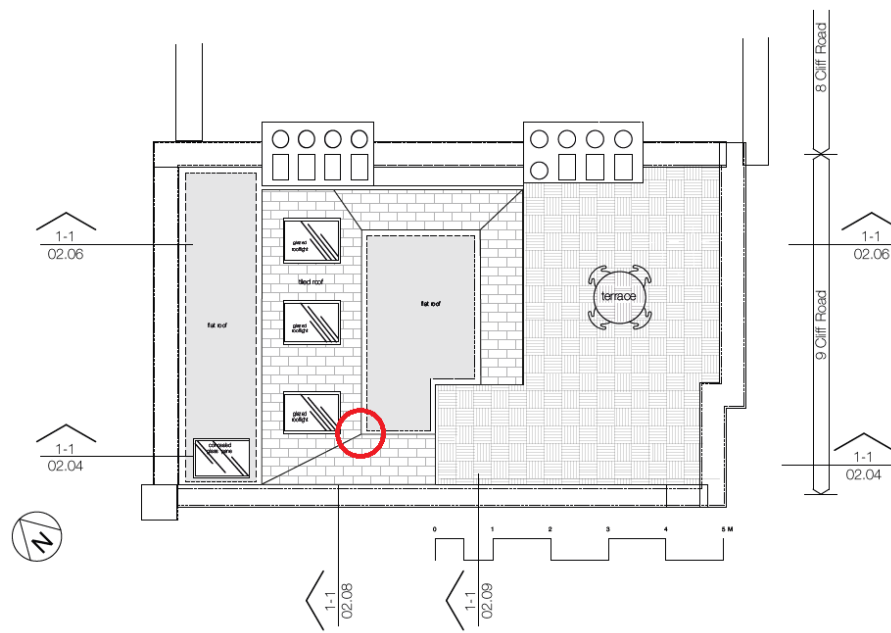


Figure 6. Photo location for back of the building



Figure 7. Towards Camden Park Road and Camden Road





*Figure 8. Towards Camden Mews and Camden Road*



*Figure 9. Towards Camden Road and York Way*





Figure 10. Towards 10 Cliff Road

As evident from the above photos and stressed in the plans and documents submitted with the original application new extension is fully concealed and not perceptible from any public highway or street-level views given its careful placement within the existing parapet walls - hence fully addressing concerns raised for previous applications and appeal attempts for the site. The development proposal has evolved in design terms to respond directly and with some exactitude to the previous appeal decisions.

The main considerations in the Delegated Report is the assessment of the proposal in terms of design and conservation and impact on neighbouring amenity (Policy D1 & D2). However, the Council's officers delegated report seems to be a copy of the previous reports and fails to take into account the significant differences in size, form and design of the new proposal.

Paragraph 3.4 of the Delegated report states *'Proposals for alterations to roofs within the conservation area will be considered on their own merit but particular care is needed to ensure sensitive and unobtrusive design to visible roof slopes or where roofs are prominent in long distance views'*

The Council have failed to acknowledge or pay due regard to the significant differences with the current scheme design which focus on unobtrusive design making roof slopes completely concealed from public views - either immediate or long distance at both front and back - owing to a sensitive design taking advantage of configuration of parapet walls and immediate neighbouring buildings.

It is common ground that historically Nos. 8-15 Cliff Road have been 4 pairs of semi-detached houses (as referenced in Paragraph 3.6 of the Decision notice). However, the treatment of roofs varies as a result of a previous infill redevelopment which is especially evident when the group is seen from the back. Hence I disagree with the Council that the building currently forms a clear part of this group. This was partly recognised in appeal decision to the 2018 application ref APP/X5210/W/18/3210011: *“the existing rear elevation roof form of Nos. 8 and 9 does differ from Nos. 10-15 and the group is less clearly defined when viewed from the rear”* and is evident in the photo attached to Paragraph 3.8 by the LPA themselves. The building in the streetscape is seen as an individual property and is physically separated from the continuous terrace. The treatment of each facade is different. The application site retains the original exposed London stock brickwork construction. The continuous facade to 10-15 Cliff Road is treated with an exterior paint finish which unifies the elevation across its length. The facade treatment further emphasises visually the separation of no. 8 & 9 Cliff Road from the ‘group’ to which it is associated by the LPA. I would note that this variety of roof alterations and differences in roof treatments are more prominent from street level than the proposal in question.



Figure 2. View to the front from Cliff Road with roof alterations visible

Paragraph 3.7 states that *“the proposed roof extension, whilst set back from both the front and rear parapets, would nonetheless add an additional storey resulting in the building becoming the tallest in its building group, and higher than Cliff Road Studios to its north”*. This sentence is factually incorrect and has been disproven in the previous Appeal decision (*“Although Cliff Road Studios would remain higher...”* in ref APP/X5210/W/18/3210011); however is yet again copied by the LPA onto the Decision notice. More importantly the proposal would not be setting a precedent of



additional height to the building - the existing chimney stacks on the party wall between 8 and 9 Cliff Road would remain the tallest point. New proposal also avoids introduction of a new roof ridge or any visible roof slopes.

Paragraph 3.8 attempts an argument that the proposal *“is likely to be visible in longer, oblique views of the rear elevation from Camden Park Road”* and provides a photo of the application site from the back. Should they have engaged with the proposal they would recognise that this was not the case and actually the structure would not be visible from either front or back of the building - nor from the vantage point LPA chose to illustrate in the Decision notice. Unfortunately, any constructive dialogue was dismissed early on the consultation process by the LPA which does not accord with NPPF; Paragraph 187. The same paragraph states that the new structure would *“be apparent in private views from ‘above ground’ windows of neighbouring buildings”*. This is an almost implausible assessment from which to determine the proposal.

Paragraph 3.8 also states that *“any additional structure, regardless of its form and design, would not be supported in this location”* which seems to be a departure from LPA’s own previous position and a rather absolute statement which seems to ignore merits of individual applications and the careful design proposed in this current application. Planning history for 9 Cliff Road started with a pre-application (REF 2015/1114/PRE) which was favourably received by the Camden LPA with minor suggestions: *“Given the mid terraced setting of No. 9 Cliff Road, the set back of the proposed extension from the front elevation, the varied character of Cliff Road in general, and adoption of the suggested design changes above, it is this officer’s opinion that the proposed roof extension could be considered acceptable”*. Pre-application advice is described in detail in the Design and Access Statement enclosed with the application - I would only highlight that the current proposal is an even more modest and scaled back structure further set back from both front and rear elevations with a more traditional design and materials. LPA Decision Notice makes no reference to the pre-application advice nor discusses it.

Paragraph 3.9 states that *“Large expanses of glazing at this level on historic buildings is not typically supported as it creates a jarring contrast and does not respect the solid to void ratios and window hierarchy of the host building”*. As compared to previous applications the amount of glazing in the current proposal is very limited and similar rooflights to the rear can be observed both on Camden Mews directly opposite but also on Cliff Road itself (including rear glazing at Loth House at 1 Cliff Road). Glazed access door to the front is significantly set back from the front elevation and is not visible. LPA’s argument that *“the terrace is likely to accumulate clutter (such as parasols and planting) that would be visible from the street”* does not deserve merit as roof at 9 Cliff Road is already demised as a roof terrace belonging to the flat so there is no change of use. The argument has been refuted in the previous Appeal decision for the site but is yet again copied onto the Decision Notice by the LPA. The terrace would also be fully concealed behind the existing parapet walls (as it is currently). From the outset consideration has been given on how the proposal would affect neighbours. Initial key design decisions have avoided

excessive fenestration, a simple architectural language is proposed, which compliments the character of the rest of the building. Due to the form of the new roof extension visual privacy and overlooking have been addressed in the design. The roof terrace has been reduced to provide a smaller terrace to the front of the building. The previous decision and appeal established a loss of privacy for adjoining property owners had already been established and accepted by LPA in Paragraph 4.2. There is local support for the development as previously recognised in the Appeal Decision and there were no comments received to this revised scheme.

The general policy documents of the local authority offer no specific design guidance for a proposal of this type with the guidelines better suited to the more typical infill roof extensions. Still the proposal is of highly traditional materials and of general shape often found on properties in the vicinity:



Figure 3. Roof extensions on nearby properties on Tollington Road

LPA Decision Notice also includes a Camden Square CAAC assessment that makes a number of incorrect or tenuous arguments which I will address below:

- *“The drawings are schematic rather than showing a buildable scheme and, if drawn to satisfy Building Regulations and be buildable, would be significantly larger”*. Building advice has been sought and the assumptions in the statement are without merit. Extension is buildable with the heights and elevations provided and the 2M headroom to satisfy Building Regulations is achievable within the measurements specified. Were the LPA more open to a dialogue any concerns could have been discussed and disproven.
- *“the landing structure would block the top of the window”*. As detailed on the internal plans landing structure would be at the very top of the landing window, imperceivable from the outside and not blocking the light inside. Internal landing is fully demised to the flat.
- *“The scheme would add inappropriate bulk above the roof of a group of mid-19th Century buildings with no roof extensions <...> The structure would be obtrusive from the rear but also from angled and more distant views”*. As discussed above these statements are incorrect. The structure would not be visible from the rear, angled or distant views and submitted plans and photos

above clearly illustrate that. It seems that CAAC did not fully engage with the proposal in their assessment. Furthermore, scale and proportion of the proposed development is modest and traditional. Being imperceivable in any street views it would not harm the host building, the pair or wider group nor the Conservation Area.

## 5. Conclusion

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Decision Notice conclusion states that:

*“The extension would interrupt a consistent parapet line across its wider building group that demonstrates no other alterations. The roof extension would result in the building being higher than its neighbours on either side and unbalance the existing symmetry with no.8 Cliff Road. Furthermore, the detailed design, including its glazed doors and incorporation of front roof terrace, is non-traditional and would introduce incongruous features that are likely to be prominent from the public realm. It is therefore considered the roof extension would be detrimental to the host property, the building pair, the wider building group, and the Camden Square Conservation Area”*

I refute this statement which seems to be largely copied from the previous application decision notice and doesn't take into account the significantly scaled back design with greatly reduced massing in line with the previously favourable pre-application discussion with the LPA. Although historically linked, the building group demonstrates roof alterations visible from both front and back as per the photos and discussion above. Design is of the traditional mansard type and materials, scaled back to reduce bulk and to satisfy the comments in the previous Appeal decisions. I dispute the Council's description of the extension as “*incongruous*” which is contrary to the NPPF; Paragraph 60. This is the same wording adopted by the previous report by the Council; and the remark chooses, conveniently to take no account of the revised design approach. Importantly new design would not be prominent or visible at all from the public realm contrary to the LPA statement. Nor the statement that the building will become higher than the neighbours on either side is factually correct - due to reduced height and elevations the existing chimney stacks will remain the highest point of the building.

In response to pre-application advice and previous planning and appeal decisions, and the comments made by the Inspector, the proposed scheme skilfully addresses the comments to overcome all earlier concerns. All of design features have been carefully considered and incorporated to respond to the appeal decision, which the Council fail to consider in their report. The proposed roof incline allows the proposed roof extension to remain completely concealed from any public realm views due to the proposed relationship with the existing parapet walls and features when viewed from the road. The new scheme embraces the retention of traditional features, from the existing parapet, the retention of chimney stacks and the existing party wall separation.

The development has been viewed holistically with a view to improving the maisonette to accommodate a larger family. It is my intention, anticipating a positive decision, to carry out the refurbishment internally as part of the works which ultimately would improve the housing stock within the Borough in accordance with The London Plan; Paragraph 1.49. Sustainable materials of highest quality will be used throughout, and overall energy efficiency will be significantly improved - in part



due to replacing existing fenestration with double-glazed units which is part of the same planning application. The reconfiguration to the second floor is limited, to facilitate access to the new roof-top extension and avoid unnecessary replanning. As part of the refurbishment works, an additional bedroom to the second floor is proposed to provide more appropriate accommodation for the family which accords with The London Plan: Paragraph 1.15C.

The Council's delegated report concludes that the principle of a roof-top extension at the site is considered inappropriate in terms of form, scale and design and is therefore contrary to policies D1 and D2. I disagree that the scheme proposals are contrary to Policies - proposal is well-conceived and detailed to address and respond to the previous refusals of planning permission and appeal decisions. The revised design approach is refined, traditional in form and respects the character, setting, context and the form and scale of neighbouring buildings. It is significantly scaled back and modest and is imperceptible in public realm views hence paying attention to the proportions of the existing building.

As noted by the Delegated Report in Paragraph 3.3 the definition on CPG1 is misconstrued in *"roof alterations are only likely to be unacceptable where there is an established form of roof addition or alteration to a terrace or group of similar buildings. Roof additions are unacceptable where groups of buildings have a largely unimpaired roof line."* With regard to the supplementary policy guidance this should not be considered an absolute policy, and the use of the word 'likely' should allow the decision maker the ability to more flexibly assess the merits of the case.

Based on this assessment, I believe there is a logical and compelling case that the scheme is architecturally sympathetic to the character of the host building; there is no loss of historic roof form given the bulk and scale of the proposal. The new scheme has been designed to respect the historic and traditional proportions of the host building and to harmonise well with neighbouring buildings, adjacent terrace and the wider Camden Square Conservation Area. I feel the planning department has failed to engage fully with the application and as a result have not understood how there is no effect on either adjacent properties nor wider building group or conservation area.

In my view the scheme is wholly in accordance with the core principles and guidance within Government policy, regional policy, and local development planning policy. It is most discouraging, given the care and attention paid by the revised design to respond to the previous refusal and appeal decisions, that the Council's assessment casts doubt as to whether the revised scheme was properly assessed on its own merits.

The new roof-top extension scheme seeks to make efficient use of this site to meet, in some small part, a recognised and acute housing need in Central London, taking a design approach that poses no visible impact to the host building or wider area. It does not have any visual prominence. The proposed development will not lead to any harm or loss of significance to the Camden Square Conservation Area at all (not *"less than substantial"* referenced in the Decision Notice). Planning permission

should be granted for the proposed development scheme that respects the conservation context and aims to improve the housing stock in Central London. It is wholly in accordance with policies D1, D2 DP24, DP25, DP26 and CPG1.

For the reasons stated above, and taken alongside the material presented as part of both the application and appeal case, I would respectfully request the Inspector to find favour with this logical, sensitive, and private residential investment proposal and to uphold the Appellant's appeal.

## 6. Planning Policy

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The following Planning Policy documents have been referenced in the Appeal discussion.

### National Planning Policy Framework

The National Planning Policy Framework (NPPF) was published on 27 March 2012, and contains the Government's planning policies for England and explains how these are expected to be applied. Section 38 (6) requires that applications for development must be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF is a material consideration in planning decisions.

The Framework is a key output resulting from the Plan for Growth and the Government's proposals to reform the planning system. It sets the planning agenda for supporting and proactively driving sustainable economic growth. The Ministerial Foreword to NPPF states that:

*"The purpose of planning is to help sustainable development. Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations. Development means growth. We must accommodate the new ways by which we will earn our living in a competitive world... We must respond to the changes that new technologies offer us. Our lives, and the places in which we live them, can be better, but they will certainly be worse if things stagnate."*

Paragraph 9 is also of relevance and states that *"pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):*

- *Replacing poor design with better design;*
- *Improving the conditions in which people live, work, travel and take leisure;*  
*and*
- *Widening the choice of high quality homes"*

In paragraph 17, one of these core principles states that planning should *"always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings."*

Furthermore, paragraph 57 states that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings.

Paragraph 60 adds that planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

Paragraph 131 states that *“in determining planning applications, local planning authorities should take account of:*

- *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 viability; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness.”*

Paragraph 187 advises that *“local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.”*

In determining planning applications, paragraph 197 concludes *‘in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.’*

#### National Planning Policy Guidance

The appeal scheme has also carefully considered all of the following National Planning Policy Guidance documents, in particular:

- Conserving and enhancing the historic environment;
- Design; and
- Appeals.

#### The London Plan

The Statutory Development Plan for this Appeal comprises the July 2011 London Plan (amended by Revised Early Minor Modifications to the London Plan October 2013 and Further Alterations March 2016) together with Camden’s local planning policies.

Regional planning policy for London is contained within the July 2011 London Plan (as amended 2016) which sets out planning policy for the capital until 2031, integrating social, economic and environmental policy. The underlying objective is to accommodate London’s population and economic growth through sustainable development. The key policies and paragraphs have been set out below.

The London Plan objectives (as set out under Policy 1.1) are to ensure London is:

- A City that meets the challenges of the economic and population growth;
- An internationally competitive and successful city;
- A City of diverse, strong, secure and accessible neighbourhoods;
- A City that delights the senses;



- A City that becomes a world leader in improving the environment; and
- A City where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.

Paragraph 1.4 of the Plan states that London's population is likely to continue to grow and by the 2020s there are likely to be more Londoners than at any time in the city's history.

Paragraph 1.15C concerns household size and growth, and states, *"these trends mean we will have to plan for more homes, particularly meeting the accommodation needs of families and single person households including older people, both of which are likely to increase in number."*

Paragraph 1.47 identifies that only prudent course is to plan for continued growth. The paragraph continues stating these action plans, set out below, are essential to ensuring the capital remains a safe and attractive place to live in and to do business:

- Substantial population growth, ensuring London has the homes, jobs, services and opportunities a growing and ever more diverse population requires. Doing this in ways that do not worsen quality of life for London as a whole means we will have to ensure we make the best use of land that is currently vacant or under-used;
- A growing and ever changing economy by promoting and supporting innovation and ensure there are policies in place that allow them the space to grow in places meeting their needs.
- Making real progress in addressing climate change, in making sure buildings and the public realm are designed with climate change in mind, and reducing our emissions.
- Development can be managed to help this — designing buildings to be energy efficient, promoting decentralised and renewable energy and patterns of development that reduce the need to travel by less environmentally friendly modes of transport.
- Improving quality of life for all Londoners and all of London – enabling growth and change, while also supporting the retention of London's heritage and distinctiveness, and making living here a better and more enriching experience for all.

Paragraph 1.49 supports and recognises the importance of improving and modernising the capital's building stock and private investment in the built environment, and states *"In looking at how these challenges are to be met, it is important to remember that the private sector dominates London's economy, accounting for 84 per cent of output and employment. Achieving all the environmental, economic and social objectives outlined in this Plan relies upon modernisation and improvement of the capital's stock of buildings and public realm, and this in turn means encouraging private investment and development."*

Policy 3.3 states that the Mayor recognises the pressing need for more homes in London.

Part D of this policy encourages Boroughs to achieve and exceed the relevant minimum borough annual average housing targets.

Policy 3.5 states housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live.

Paragraph 4.15 further states, *"London's economic growth depends heavily on an efficient labour market and this in turn requires adequate housing provision to sustain it."*

Policy 5.3 concerns sustainable design and construction and provides key sustainable design principles. The policy further states that development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.

Policy 7.4 states that developments should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. Planning decisions for buildings should provide a high quality design response that considers the criteria set out under Policy 7.4.

Policy 7.6 confirms that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. In relating this to planning decisions, the policy requires that buildings and structures should be of the highest architectural quality, be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm, comprises details and materials that complement, not necessarily replicate, the local architectural character.

#### Local Planning Policy - Policy D1 Design

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

- respects local context and character;
- preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- is of sustainable and durable construction and adaptable to different activities and land uses;
- comprises details and materials that are of high quality and complement the local character;

- 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;
- is inclusive and accessible for all;
- promotes health;
- is secure and designed to minimise crime and antisocial behaviour;
- responds to natural features and preserves gardens and other open space;
- 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,
- incorporates outdoor amenity space;
- preserves strategic and local views;
- for housing, provides a high standard of accommodation; and
- 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. The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

- character, setting, context and the form and scale of neighbouring buildings;
- the character and proportions of the existing building, where alterations and extensions are proposed;
- the prevailing pattern, density and scale of surrounding development;
- the impact on existing rhythms, symmetries and uniformities in the townscape;
- the composition of elevations;
- the suitability of the proposed design to its intended use;
- inclusive design and accessibility;
- its contribution to public realm and its impact on views and vistas; and
- the wider historic environment and buildings, spaces and features of local historic value.

The Council will welcome high quality contemporary design which responds to its context, however there are some places of homogenous architectural style (for example Georgian Squares) where it is important to retain it. Good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings. Character is about people and communities as well as the physical components

Design should respond creatively to its site and its context including the pattern of built form and urban grain, open spaces, gardens and streets in the surrounding area. Where townscape is particularly uniform attention should be paid to responding closely to the prevailing scale, form and proportions and materials. Design should be durable in construction and where appropriate should be flexible and adaptable for a

range of uses over time. The durability and visual attractiveness of materials will be carefully considered along with their texture, colour, tone and compatibility with existing materials. Alterations and extensions should be carried out in materials that match the original or neighbouring buildings, or, where appropriate, in materials that complement or enhance a building or area.

### Local Planning Policy - 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.

Designed heritage assets include conservation areas and listed buildings.

The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

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

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

### Other Local Planning Policy

Policy CS13 concerns climate change through promoting higher environmental standards.

The policy states that the Council will encourage all development to meet the highest standards that are viable by promoting the efficient use of land and buildings; minimising carbon emissions; ensuring developments use less energy; and ensuring buildings are designed to cope with, and minimise the effects of climate change.

Policy DP25 aims to maintain the character of Camden's conservation areas, and the Council will:

- take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;



- only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
- not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
- preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.

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.

Policy DP26 seeks to manage the impact of development on occupiers and neighbours to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. In addition, the policy also requires developments to provide:

- an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;
- facilities for the storage, recycling and disposal of waste;
- facilities for bicycle storage; and
- outdoor space for private or communal amenity space, wherever practical.

### Camden Planning Guidance 1 (Design)

(CPG1) was adopted in 2011 and updated in September 2013. This guidance seeks to support the policies in the Council's Core Strategy and Development Policies - and forms a Supplementary Planning Document (SPD).

Section 3 of CPG1 relates to heritage and states that Camden has rich architectural heritage and that there is a responsibility for the Council to preserve, and where possible, enhance these areas and buildings.

Section 4 of CPG1 relates to extensions and alterations, stating that these should take into account the character and design of the property and its surroundings; and windows, doors and materials should complement the existing building.

Section 5 of CPG1 specifically concerns roofs, and states that roof extensions fall into two categories: alterations to the overall roof form; and smaller alterations within the existing roof form, such as balconies and terraces. When a roof extension or alteration is proposed, the main considerations are:

- The scale and visual prominence;

- The effect on the established townscape and architectural style;
- The effect on neighbouring properties.

Paragraph 5.7 states that '*additional storeys and roof alterations are likely to be acceptable*' where:

- There is an established form of roof addition or alteration to a terrace or group of similar buildings and where continuing the pattern of development would help to re-unite a group of buildings and townscape;
- Alterations are architecturally sympathetic to the age and character of the building and retain the overall integrity of the roof form;
- There are a variety of additions or alterations to roofs which create an established pattern and where further development of a similar form would not cause additional harm.

Paragraph 5.8 states: "a roof alteration or addition is likely to be unacceptable in the following circumstances where there is likely to be an adverse affect 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 extension, even when a proposal involved adding to the whole terrace or group as co-ordinated design;
- Buildings or terraces which already have an additional storey or mansard;
- Buildings already higher than neighbouring properties where an additional storey would add significantly to the bulk or unbalance the architectural composition;
- Buildings or terraces which have a roof line that is exposed to important Londonwide and local views from public places;
- Buildings whose roof construction or form are unsuitable for roof additions such as shallow pitched roofs with eaves;
- The building is designed as a complete composition where its architectural style would be undermined by any addition at roof level;
- Buildings are part of a group where differing heights add visual interest and where a roof extension would detract from this variety of form;
- Where the scale and proportions of the building be overwhelmed by additional extension.'

## **7. List of Documents**

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### Planning Application Documents:

1. Planning Application Form.
2. Site Location Plan.
3. Existing & Proposed Drawings.
4. Planning, Design & Access Statement.
5. Decision Notice 2020/5142/P
6. Officers Report 2020/5142/P

### Appendices:

1. Pre-Application Proposed Drawings and Plans
2. Pre-Application Advice REF 2015/1114/PRE