

**197 Prince of Wales Road
London
NW5 3QB**

**Heritage Statement
Design and Access Statement**

Ref: 1011/08/2022

August 2022



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Note:

Site outlines may appear differently on some figures owing to distortions in historic maps. North may not be up the page and is generally approximate on early maps.

Unless otherwise noted, figures are not shown to scale.

References where appropriate are shown in the body of the text.

Executive summary

We are instructed on behalf of Clients to prepare a Heritage Statement and Design and Access statement in relation to a proposed development at 197 Prince of Wales Road London NW5 3QB

The proposal comprises the erection of a mansard roof extension with dormer windows to front and rear.

Heritage

This desk-based study assesses the possible impacts of the proposed development on built and other heritage assets in the area. There are no designated assets on the site.

The nearest designated built heritage assets are the ZABLUDOWICZ COLLECTION (Grade II, List UID: 1139077) and Nos 131-149, PRINCE OF WALES ROAD (Grade II, List UID: 1139076 (Grade II)), both some distance away to the east. These are scoped out of consideration by virtue of relative disposition, intervening urban and sub-urban forms, lack of intervisibility and absence of causal links. It is considered that there will be no impact on significance of these or any other listed asset.

The site is part of a terrace included on the LPA's local list, reference 640; the property is considered to be a Non-designated Asset. (NDA).

There are other non-designated built heritage assets (NDAs) in the area, including Nos 169-179 Prince of Wales Road (reference 639), to the east.

The development is nominally in the setting of this terrace on account of proximity but, by virtue of relative disposition, intervening urban and sub-urban forms, lack of meaningful intervisibility and absence of causal links it is considered that there will be no impact on significance of any asset.

The site is not within a Conservation Area.

Design and Access

There is no objection to the proposal in principle.

The proposed design is proportionate and appropriate. The resultant extension will be subordinate in scale and appearance and complimentary in terms of materiality. It will contribute in the positive to the street-scene.

There is real and sustained pressure for development of additional living space in the roof areas of properties in the area and further afield; a responsible, well-designed development would set the precedent for good design and represent the best use of resources.

The site is in a sustainable location.

The site is in an accessible location.

The proposed development will not affect the accessibility of the property.

Conclusions - Heritage

The proposal will have no physical impact on the significance of any asset.

By virtue of intervening urban and suburban forms, relative disposition, lack of meaningful inter-visibility and absence of causal links, it is considered that the setting of designated and non-designated assets will be materially unaffected by the proposed scheme. There will be no harm to significance.

The proposal is considered to accord with legislation, national and local heritage policy and advice.

Recommendation

No further assessment is required.

Conclusion – Design and Access

The proposal is considered to accord with legislation, national and local design policy and advice.

Mark Strawbridge MRTPI IHBC FRSA

CAMplan

1 Introduction

1.1 Origin and scope of the report

- 1.1.1 We are instructed on behalf of Clients to prepare a Heritage Statement and Design and Access statement in relation to a proposed development at 197 Prince of Wales Road London NW5 3QB
- 1.1.2 The proposal comprises the erection of a mansard roof extension with dormer windows to front and rear.
- 1.1.3 This desk-based study assesses the impact of the scheme on built heritage assets (standing buildings). It forms an initial stage of investigation of the area of proposed development (hereafter referred to as the 'site') and may be required in relation to the planning process in order that the local planning authority (LPA) can formulate an appropriate response in the light of the impact upon any known or potential heritage assets. These are parts of the historic environment which are considered to be significant because of their historic, evidential, aesthetic and/or communal interest.
- 1.1.4 The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (DCLG 2021) and to standards specified by the Institute for Archaeologists (CIfA Oct 2012/Nov 2012), English Heritage (2008, 2011), Historic England (2015) and the Institute of Historic Building Conservation (IHBC 2009).
- 1.1.5 Note: within the limitations imposed by dealing with historical material and maps, the information in this document is, to the best knowledge of the author, correct at the time of writing. Further investigation, more information about the nature of the present buildings, and/or more detailed proposals for redevelopment may require changes to all or parts of the document.
- 1.1.6 The assessment considers design and access policy issues.

1.2 Designated heritage assets

- 1.2.1 There are no designated built heritage assets on the site.
- 1.2.2 The nearest designated built heritage assets are the ZABLUDOWICZ COLLECTION (Grade II, List UID: 1139077) and Nos 131-149, PRINCE OF WALES ROAD (Grade II, List UID: 1139076 (Grade II), both some distance away to the east. These are scoped out of consideration by virtue of relative disposition, intervening urban and sub-urban forms, lack of intervisibility and absence of causal links. It is considered however that there will be no impact on significance of these or any other listed asset.
- 1.2.3 The site is not within Conservation Area (CA).

1.3 Non-designated assets

- 1.3.1 The LB Camden maintains a local list; this includes the terrace Nos.181-199 Prince of Wales Road (Ref: 640), noted for Architectural and Townscape Significance.
- 1.3.2 The property is considered to be a Non-designated Asset. (NDA).
- 1.3.3 There are other non-designated built heritage assets (NDAs) in the area, including Nos 169-179 Prince of Wales Road (reference 639), to the east. These are also scoped out of consideration by virtue of relative disposition, intervening urban and sub-urban forms, lack of intervisibility and absence of causal links. It is considered however that there will be no impact on significance of any NDA.

1.4 Aims and objectives

- Identify the presence of any built heritage assets that may be affected by the proposals;

- describe the significance of such assets, as required by national planning policy;
- assess the likely impacts upon the significance of the assets arising from the proposals; and
- provide recommendations for further assessment where necessary of the historic assets affected, and/or mitigation aimed at reducing or removing completely any adverse impacts upon heritage assets and/or their setting.

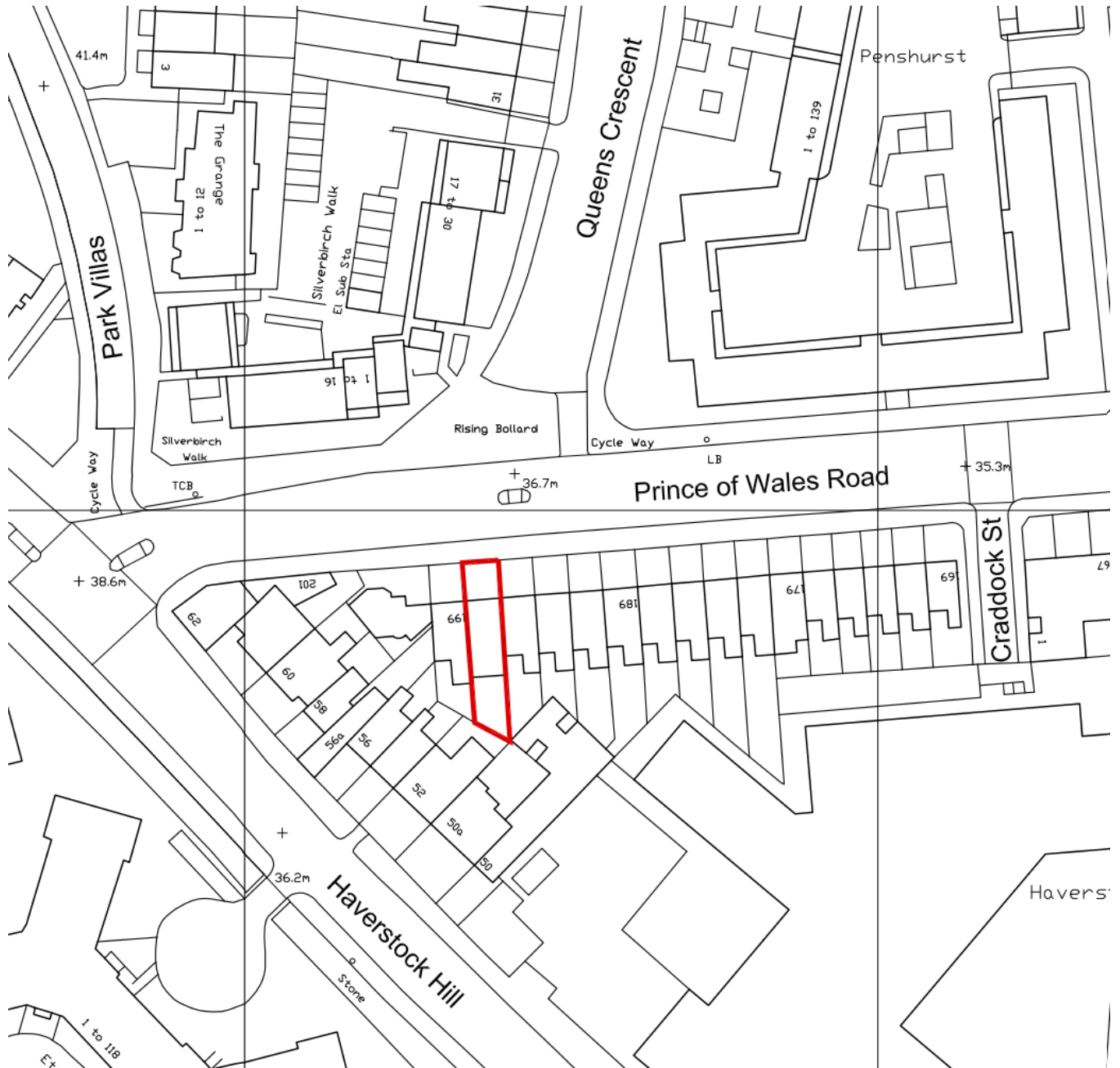


Fig 1 Site (Client 2022)

2 Site and Environs

2.1 Site

- 2.1.1 No. 197 Prince of Wales Road is a single dwelling over three storeys, plus a basement level and is second to last in the residential terrace block, Nos. 169-199.
- 2.1.2 The building is located on the south side of Prince of Wales Rd, near the junction with Haverstock Hill and opposite the junction with Queens Crescent.
- 2.1.3 The south side of the road is characterised by C19th, 3-storey plus basement terraced residential properties. To the north side of Prince of Wales Road there are residential properties, some of which are 4 stories plus a habitable 'mansard roof', built in the mid-C20th.
- 2.1.4 The site is an element of the terrace of mid-C19th houses set behind front gardens, with stucco architrave and bracketed cornice to windows, and a front parapet cornice.
- 2.1.5 The existing roof is set behind a flat parapet, concealing the roofline from views from the public realm.
- 2.1.6 The adjacent residence, No. 199, to the west of the site is the end of terrace building, which has a roof extension, granted in 1971.
- 2.1.7 The adjacent residence, No. 195, to the east of the site, is currently vacant and derelict following 2 fires in recent years.
- 2.1.8 The wider area is residential and commercial in character, with some local services in a mix of ages and forms of development, roofscape and materials, mostly lining the road and set off the back of pavement.
- 2.1.9 The site, terrace and urban environs have been subject to substantial change through time.
- 2.1.10 The site is in a sustainable location. The original design is such that there are steps up off the road level.

2.2 Designated Heritage Assets

- 2.2.1 There are no designated built heritage assets on the site. The nearest are some distance away to the east. (See Fig 2).

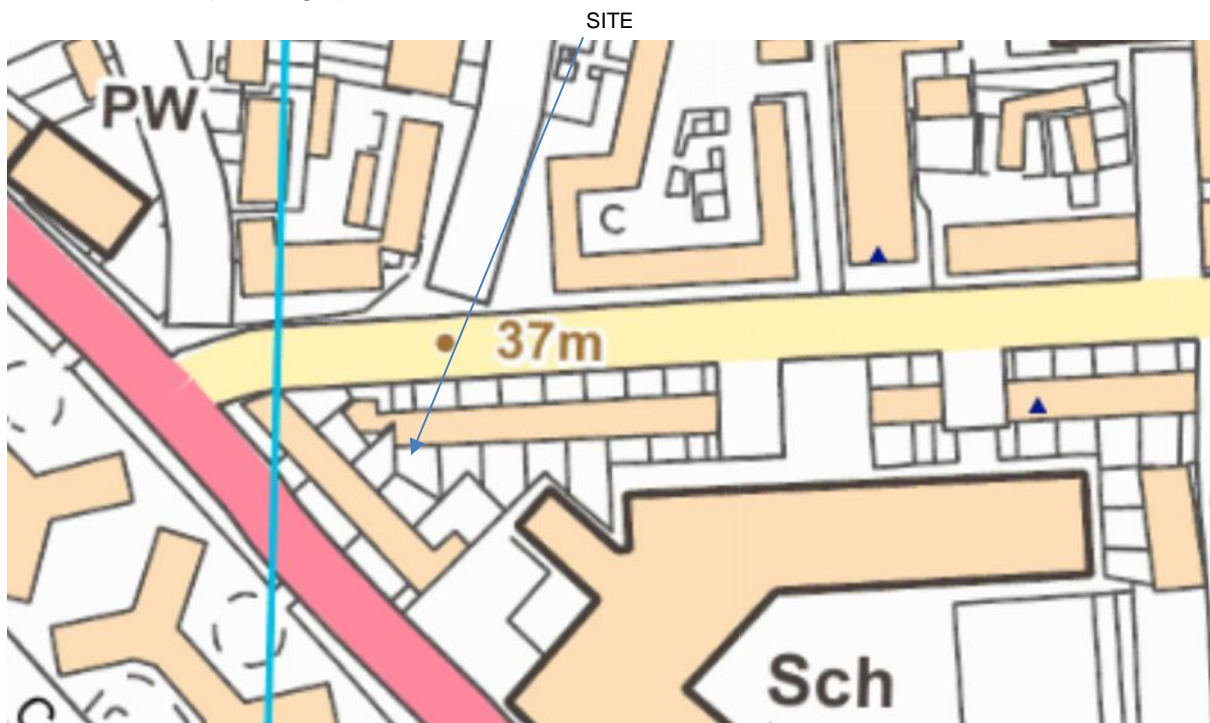


Fig 2 Designated Assets (Source: HE 2022)

NB Blue triangles indicate LBs

- 2.2.2 By virtue of intervening suburban forms, lack of inter-visibility and relative disposition, it is considered that the setting of nearby designated assets will be materially unaffected and consequently there will be no harm to significance. Designated assets (i.e., LBs) are scoped out of consideration.



Fig 3 The site as existing (Front) (Client 2022)



From West (Client 2021)



From North (Client 2021)

Fig 4 The site in context

2.3 Non-designated assets

- 2.3.1 The LB Camden maintains a local list, published 2017; this includes the terrace Nos.181-199 Prince of Wales Road (Ref: 640), which is noted for Architectural and Townscape Significance. No.197 is part of the terrace and as such is considered to be a NDA in its own right.
- 2.3.2 The NDA is described as:
Terrace of 10 mid-19th century houses set behind large front gardens. Projecting bay at ground floor, stucco architraves to windows with bracketed cornice and curved pediment; dentil cornice to roof parapet. This group continues the high-quality townscape edge provided by its neighbours to the east. (Ref: 639 – Nos 169-179 Prince of Wales Road)
- 2.3.3 The overall conclusion of the assessment is that this section of Prince of Wales Road is not of sufficient quality to merit statutory listing.
- 2.3.4 There are other non-designated built heritage assets (NDAs) in the area, including as referred to above, Nos 169-179 Prince of Wales Road (reference 639), to the east. These are also scoped out of consideration by virtue of relative disposition, intervening urban and sub-urban forms, lack of intervisibility and absence of causal links. It is considered however that there will be no impact on significance of any NDA.
- 2.3.5 As other assets will be materially unaffected they have been scoped out of consideration.



Fig 5 (GE 1999)

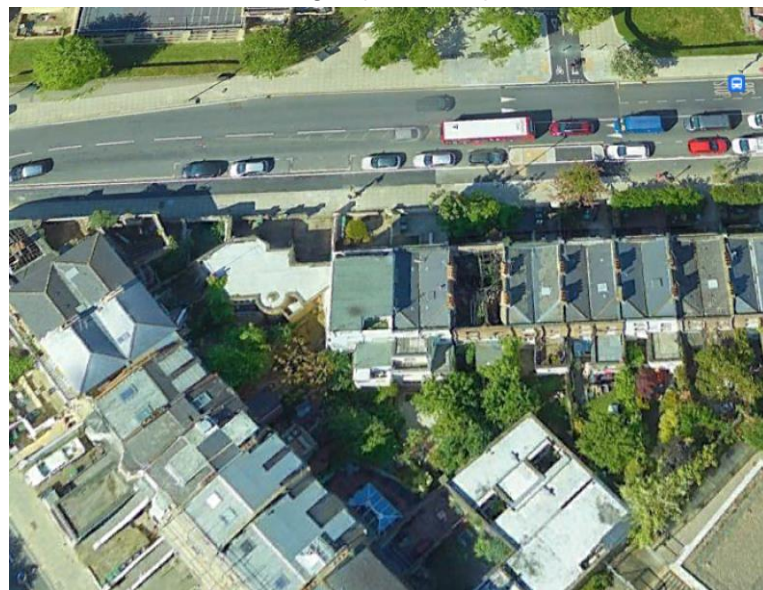


Fig 6 (GE 2021)

2.3.6 Fig 6 shows the situation in early 2021.

2.4 Conservation Area

2.4.1 The site is not within a Conservation Area nor is it in the setting of one. The area is of insufficient cohesiveness or consistency of character to merit consideration.

3 Significance

3.1 Planning History

3.1.1 Inspection of the LPA website reveals one recent application for the site:

- LPA ref: 2020/1967/P - Erection of mansard roof extension with dormer windows to front and rear.

3.1.2 This application was withdrawn.

3.1.3 The site was granted approval, in 1988, for a rear extension, which has been implemented.

3.1.4 Application 2021/3929/P, relating to No.195, was approved earlier this year. This proposal includes a roof terrace.

3.1.5 The roof extension to No.199 was approved in the early 1970s (Client confirmed).

3.1.6 Various other proposals for changes to properties in the terrace have been approved in recent times, without apparent impact on significance.

3.1.7 There have been at least fifteen approvals for extensions, alterations and other minor developments in the postcode and environs. It is concluded that appropriate change is a component of the character of the terrace and wider area. (See below).

3.1.8 Two of these are particularly relevant; neither are listed nor within a conservation area:

- 39 Queen's Crescent London NW5 3QD (2021/6212/P):

The Decision Notice states: The application site is a mid-terrace period property which is not located within a conservation area nor is it listed. The property reads as a group of four within the terrace and the adjacent property no.41 has a mansard roof extension granted on 8/02/1990 under ref.8802614. There are a number of mansard roofs along Queens Crescent and the roofline is therefore not unimpaired. The proposal would be in keeping with the character of the surrounding area.

- 62-64 Queen's Crescent London NW5 4EE (2020/2730/P):

There are a number of existing roof additions on this terrace and further development of a similar form is not considered to cause harm to the character of the building or wider area. It is also noted that a mansard roof extension was granted at no. 66, ref. 2016/3344/P dated 17/02/2016. The proposed mansard roof extension would be architecturally sympathetic to the age and character of the parent building. The height of the flat-topped mansard would be the same height as the adjacent mansard at No. 60 Queens Crescent, with an internal floor to ceiling height of 2.4m. The dormer windows for the proposed mansard would respect the size, style and positioning of the existing windows on lower floors. The materials would be traditional timber and tile to match the character of the building.

3.1.9 Whereas a precedent cannot generally be claimed in matters heritage, the same policy environment exists for similar applications in the vicinity. Consistency of application of these policies must be assured.

3.2 The NDA

3.2.1 The local list (LL) was published by the LB Camden in 2017.

3.2.2 The Selection Criteria for inclusion on the LL is stated as follows:

To be considered for inclusion on the Local List nominations should satisfy a minimum of two criteria with at least one of them being either criteria 1 or 2.

Criteria 1 - Architectural significance this includes assets that; a) demonstrate distinctive artistic, craftsmanship, design or landscaping qualities of merit (e.g. form, layout, proportions, materials, decoration); and/or b) are attributed to a locally known, architect, designer, gardener

or craftsman and demonstrates quality of design, execution, and innovation. and/or c) exemplify a rare type or function which survives in anything like its original condition and form.

Criteria 2 - Historical Significance this includes assets that a) demonstrate rare evidence of a particular phase or period of the area's history; and/or b) are associated with a locally important historic person, family or group; and/or c) are associated with a notable local historic event or movement; Nominations under this criteria should retain physical attributes which are of key importance to their historical significance.

Criteria 3 - Townscape Significance this includes assets which play a key part in supporting the distinctive character of the local neighbourhood either as a landmark, for their aesthetic qualities, through promoting collective identity or group value.

Criteria 4 - Social Significance this includes assets that a) are associated with distinctive communal, commemorative, symbolic or spiritual significance; and/or b) are associated with locally distinctive cultural heritage, such as art, literature, music or film; which have support from and are valued by a wider community or society. Nominations under this criteria should retain physical attributes which are of key importance to their social significance.

- 3.2.3 The NDA is not rare, nor does it display innovation. The terrace as a whole is much altered through time. The building is not 'historic' in that it is not apparently associated with persons or events of a historical nature. Similarly, there appears to be no tangible community significance.
- 3.2.4 It is deduced, therefore, that the terrace was added to the list for its townscape significance, primarily. It retains its significance despite many and various changes through time.
- 3.2.5 The Design CPG (2021)¹, at para 3.4 states that the LPA will make a balanced judgement on matters including the desirability of new development that affects heritage assets to preserve and enhance local character and distinctiveness. The level of detail required will be proportionate to the asset/s importance and no more than is sufficient to understand the potential impact of the proposal on the significance of the asset/s affected.

3.3 Contribution of Setting

- 3.3.1 Any heritage assets can have a setting which may contribute to significance. Setting is defined in the National Planning Policy Framework (NPPF) as "*The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of the asset, may affect the ability to appreciate that significance or may be neutral.*"
- 3.3.2 Setting is not an asset in its own right nor does it possess 'significance'. Setting may however contribute to the significance of an asset.
- 3.3.3 The contribution of setting to the significance of assets is an important consideration. The site is not within a Conservation Area and therefore setting of individual assets needs to be assessed in each case.
- 3.3.4 The contribution of setting is considered with reference to the Historic England document Good Practice Advice in Planning Note 3 *The setting of heritage assets* (3rd edition 2020) (GPA3).
- 3.3.5 GPA3 sets out a methodology in stages, or steps
 - Step 1 – identify the asset(s) likely to be affected and the extent of setting.
 - Step 2 – assess how and to what degree the setting makes a contribution to the significance of the asset(s).
 - Step 3 – assess the effect of the proposed development on the significance of the asset(s);

¹ The Council has prepared this Camden Planning Guidance (CPG) on Design to support the policies in the Camden Local Plan 2017. This guidance is therefore consistent with the Local Plan and forms a Supplementary Planning Document (SPD) which is an additional "material consideration" in planning decisions. This document was adopted on 15 January 2021 following statutory consultation and replaces the Design CPG (March 2019).

Step 4 – seek to maximise enhancement and minimise harm; and

Step 5 – document and monitor outcomes (This latter point is the preserve of the Planning Authority).

3.3.6 The setting of an asset is generally considered in three ‘layers’:

- Wider landscape/townscape – i.e., context;
- Proximate or intimate setting, often encompassing the curtilage of the asset;
- Prospect – e.g., looking from an asset and /or its grounds

3.3.7 Step 1 - We have identified the terrace as the only NDA that may be impacted upon by development within a nominal setting. Other heritage assets, due to lack of intervisibility, intervening urban and landscape forms, topography and lack of casual links, have been scoped out of consideration.

3.3.8 Step 2 – The context of assets and the impact on the wider landscape/townscape is not identified as being a material contributor to significance in this case. The urban framework at this point is a mixture of buildings of differing ages, forms, styles, architectural finish, materials and quality. The scale is broadly domestic/small commercial with individual properties of three or four storeys. Change is endemic. The proposed development will not be materially different or out of context.

3.3.9 Proximate views of the development site in relation to nearby assets are mostly obscured by built form. The site is currently visible from the north and, in a limited capacity, from the west. Views into the site are tangential, taken whilst travelling and generally experienced framed by built form, unrelated to but encompassing the much-altered rear elevation of the terrace.

3.3.10 There are no ‘invited’ or formal views from any location in the public realm; the prospect from the junction to the north might be a candidate but the view of the site even there comprises the roof form which is largely obscured by the existing parapet. There is no appreciable prospect from any other asset.

3.3.11 The character of built form in the vicinity, it is argued, is the product of on-going change through time. The setting of assets has been party to that change; there is nothing to suggest a watershed has been reached.

3.3.12 Step 3 is to assess the effect of the proposed development on the significance of the identified assets.

3.3.13 As described above, it is considered that the development will not materially harm the setting or impact on the significance of any heritage asset.

3.3.14 The development will not be other than tangentially visible in conjunction with the rest of the terrace and it is considered that special characteristics will not be harmed. There will be change but no material harm to significance by virtue of development in the setting of any asset.

3.3.15 In terms of Step 4, as there will be no harm there is no duty to enhance. However, any development can be made more integrated by careful and considerate design, choice of materials and appropriate landscaping.

3.3.16 In conclusion, it is considered that setting of assets is not vulnerable to change and its contribution to significance of nearby assets is unlikely to be materially impacted upon through development as proposed.

3.4 Statement of significance

3.4.1 The determination of the significance of historic assets is based on statutory designation and/or professional judgement against 4 ‘values’ (English Heritage/Historic England - 2008/2015) restated in the advice document GPA 2 - Managing Significance in Decisions

3.4.2 The 4 values are:

- Evidential value
- Aesthetic value
- Historical value
- Communal value

(This is refined by National Planning Policy Guidance (PPG), last updated in July 2021).

- 3.4.3 Listed Buildings are, as a baseline, of **High** Significance, as are CAs.
- 3.4.4 NDAs/LLBs are of **Medium** Significance as a baseline.
- 3.4.5 The NDA is not rare, nor does it display innovation. The terrace as a whole is much altered through time. The building is not 'historic' in that it is not apparently associated with persons or events of a historical nature. Similarly, there appears to be no tangible community significance.
- 3.4.6 It is deduced, therefore, that the terrace was added to the list for its townscape significance, primarily.
- 3.4.7 The NDA is considered to be at the lower end of **Medium** significance.
- 3.4.8 It should be noted that the terrace was added to the list with the roof extension to No 199 in place and long established as an element of the street-scene. The assessor at the time either did not notice it, in which case its impact was (and is) negligible or it was considered to have no impact on the significance of the asset, which would indicate that change could and can be accommodated.

4 Impact of Proposed Development

4.1 Site

- 4.1.1 The development comprises the erection of a mansard roof extension with dormer windows to front and rear.

4.2 The Scheme

- 4.2.1 The proposed development is as described in the drawing pack submitted with the application.



Fig 7 Proposed Front Elevation (TP 2022)

- 4.2.2 The proposal is for a mansard roof extension, with dormer windows, to create additional living spaces and a bedroom, to comfortably accommodate the daughter's family, and for the current occupant to maintain her independence.
- 4.2.3 It is considered that a mansard roof extension would be appropriate in this location because there is an established form of roof extensions in the area; and along Prince of Wales Rd.
- 4.2.4 The proposed mansard roof to the front of the building is set back to align with the adjacent roof extension to No. 199 and match its height.
- 4.2.5 The proposed extension is considered to be of a size and scale that respects the architectural style and appearance of the host building. The proposal is in keeping with the area in term of scale and proportionality.
- 4.2.6 The roof extension will not look out of place adjacent the existing roof extension at No. 199, and can be appreciated as a 'book-end' to the terrace. This harmonises with the two end terraces (No. 197 & No. 199) which step up from the adjoining terrace houses, as is highlighted by the stepped parapet and cornice moulding.
- 4.2.7 The roof extension is to be of high quality, with natural slate tiles, lead lined dormer windows, and timber double glazed sash windows to the front and casement window to the rear. The proposed materials are in keeping with the traditional materials suggested in the LPA guidance document.
- 4.2.8 The front dormer windows align with the fenestration pattern on the lower floors of the existing building and are smaller in scale.
- 4.2.9 A larger single casement dormer window is proposed to the rear, which is south facing and to a living area. This is not visible from the street.
- 4.2.10 The mansard roof on both sides is angled to 70 degrees, in line with the advice in the guidance document. It is a flat-topped mansard, with gentle slope for rain run-off.
- 4.2.11 The roof extension design is architecturally sympathetic to the existing building; the mansard roof is in keeping with the established pattern of roof extensions and would therefore not cause harm.
- 4.2.12 The roof extension is sympathetic to the design, form and character of the building and is subservient in size, form and appearance to the residence. It will not be prominent from the street level due to the perspective view.
- 4.2.13 The roof extension does not impact on the amenity of neighbouring buildings, as it avoids negative impacts to outlook, light and privacy. The dormer windows are set back from the existing parapet to the front and rear.
- 4.2.14 The windows of the roof extension align with those of the adjoining No. 199 property.
- 4.2.15 The rear of the property backs onto the rear of properties on Haverstock Hill, many of which have dormer extensions. These are clearly visible from the site and glimpsed from the public realm.
- 4.2.16 The existing building is of some architectural merit but it is neutral in terms of its impact on the contribution of setting to significance of nearby assets.
- 4.2.17 The proposed materials will be complimentary to the locality. These proposals are considered to have no adverse effect on the skyline or streetscape and therefore cause no harm.
- 4.2.18 The NPPF, at para 206 urges LPAs to look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Albeit not a CA or WHS, this site in the setting of heritage assets is, it is argued, one such opportunity.
- 4.2.19 There is real and sustained pressure for development of additional living space in the roof areas of properties in the area and further afield; a responsible, well-designed development would set the precedent for good design and represent the optimum use of available resources.
- 4.2.20 A LL designation should not be a 'snapshot' in time; the pattern of change, past and

anticipated, is part of its character; this should be reflected in the assessment.

- 4.2.21 The LPA has consistently permitted change of an appropriate level – extensions, alterations, loft and roof conversions, changes of use, etc. without apparent harm. There is no evidence to suggest that there is no more capacity for change nor that a watershed has been reached.

4.3 Designated assets

- 4.3.1 There is no potential for any impact on any Listed Building nor its setting.

4.4 Non-designated assets

- 4.4.1 It is considered that the proposal will not impact on the significance of the host NDA.
4.4.2 Nearby locally listed buildings are described above. For the reasons cited there will be no harm to significance.

4.5 Conservation Area

- 4.5.1 The site is not within a CA. The nearest CA is West Kentish Town, some distance to the east. This is scoped out of consideration.
4.5.2 The street scene on the south side of the road, including the terrace is relatively homogenous in terms of materials, the strength of eaves parapet lines and relationship of built form to the highway corridor are consistent for the most part. The area is diverse in terms of roof forms, however.
4.5.3 It is considered that the area at this point is not vulnerable to the impact of change in principle. With attention to detail appropriate and proportional change can be accommodated without detriment.

4.6 Setting

- 4.6.1 As discussed above, the setting currently makes no contribution to the significance of nearby assets and as such is neutral. The scheme does not impact at all; the proposal broadly mimics the traditional relationship of form and scale locally.
4.6.2 By virtue of lack of intervisibility, relative disposition and intervening urban and suburban forms, the development will not be within and therefore have no material impact on the setting of the other LBs or NDAs in the vicinity and no harm will be caused to significance.

4.7 Commentary

- 4.7.1 There are two main issues – the impact of change on significance of the NDA and, separately, the impact or otherwise the appearance of the immediate area.
4.7.2 The contribution of setting to significance of the local LBs and NDAs is discussed and it is concluded that the proposed development will cause no harm.
4.7.3 The NPPF, at para 203 states that ‘*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*’
4.7.4 The NDA is at the lower end of medium significance; it is considered that the development will lead to no harm to that status; with care and by virtue of setting a good example for future proposals and change in the immediate area there is likely to be enhancement. A balanced judgement would, in this case, be to accept appropriate change.
4.7.5 The site is not within a CA and as such potential harm to the ‘street-scene’ does not need to be assessed nor is there a requirement to preserve or enhance the character and/or appearance of the place.

- 4.7.6 The Design CPG document is not wholly compatible with the NPPF 2021 as it appears to make much less of a distinction between designated and non-designated assets and how development potentially affected should be treated. Matters relating to NDAs require a 'balanced judgement' only.
- 4.7.7 The only real obligation in policy terms is for householder development to be a 'good neighbour'. The proposal development will not be of detriment to amenity of any neighbouring property.



Fig 8 Sketch as proposed (MS 2022)

5 Conclusions and Recommendations

5.1 Conclusions

- 5.1.1 The site is 197 Prince of Wales Road London NW5 3QB
- 5.1.2 The proposal comprises the erection of a mansard roof extension with dormer windows to front and rear.
- 5.1.3 The proposal will have no impact on the significance of any asset.
- 5.1.4 By virtue of intervening urban and suburban forms, relative disposition, lack of meaningful inter-visibility and absence of causal links, it is considered that the setting of designated and non-designated assets will be materially unaffected by the proposed scheme. There will be no harm to significance.
- 5.1.5 The proposal represents an opportunity for high quality new design in this historic context and, with attention to detail could be considered to preserve the character and enhance the appearance of the NDA/area.
- 5.1.6 In this context of no harm, there is no requirement to justify the scheme against public benefits and the proposal is not required to meet the tests of either paragraphs 201 or 202 of the NPPF.
- 5.1.7 The proposal is considered to accord in full with legislation, national and local heritage policy and advice.

5.2 Recommendation

- 5.2.1 No further assessment or reporting is required.

6 Design and Access Statement

6.1 Policy

- 6.1.1 The LPA has adopted a number of planning documents that together form the development plan for Camden. It is considered to be compatible with the London Plan.
- 6.1.2 The Camden Local Plan is the key strategic document in Camden's development plan. It sets out the vision for shaping the future of the Borough and contains policies for guiding planning decisions.
- 6.1.3 The Local Plan was adopted by Council on 3 July 2017. It replaced the Core Strategy and Camden Development Policies documents. It is now the basis for planning decisions and future development in Camden. (LB Camden website).
- 6.1.4 There is no objection to the proposal in principle.
- 6.1.5 The Council has prepared a Camden Planning Guidance (CPG) on Design to support the policies in the Camden Local Plan 2017. (Updated 2021).
- 6.1.6 Para 2.16 requires that new development should be contextual and respond to existing heritage assets and features by relating to the character and appearance of the area, particularly in conservation areas or within the setting of listed buildings.
- 6.1.7 There is a duty on all LPAs to have and maintain a consistency of application of policy; and a presumption in favour of development that complies with it. Where there is an apparent conflict, a balanced judgement must be employed. It is noted that there has been a number of permissions for roof extensions, some of which are in CAs.

6.2 Design

- 6.2.1 There is no objection to the proposal in principle to the extension of a single residential property that is neither listed nor in a CA.
- 6.2.2 The proposed design is respectful of its surroundings and other examples in the near vicinity, proportionate and appropriate. The resultant extension will be subordinate in scale and appearance and complimentary in terms of materiality. It will contribute in the positive to the street-scene.
- 6.2.3 There is real and sustained pressure for development of additional living space in the roof areas of properties in the area and further afield; a responsible, well-designed development would set the precedent for good design and represent the best use of resources.

6.3 Access

- 6.3.1 CPG Access for All (2019) at para 6.1, relating to listed buildings and other heritage assets, notes that the Council will balance the requirement to provide access with the interests of conservation and preservation. further detailed guidance on achieving development that is inclusive and accessible for all.
- 6.3.2 The site is in a sustainable location.
- 6.3.3 The site is in an accessible location.
- 6.3.4 The proposed development will not affect the current accessibility of the property.

6.4 Conclusions

- 6.4.1 The proposal comprises the erection of a mansard roof extension with dormer windows to front and rear.
- 6.4.2 The proposal complies with policy and advice.
- 6.4.3 There is no objection to the proposal in principle.
- 6.4.4 The proposed development will not affect the accessibility of the property.

7 Planning Framework

7.1 Statutory protection

Listed Buildings and Conservation Areas

- 7.1.1 The *Planning (Listed Buildings and Conservation Areas) Act 1990* sets out the legal requirements for the control of development and alterations which affect buildings, including those which are listed or in conservation areas. Buildings which are listed or which lie within a conservation area are protected by law. Grade I are buildings of exceptional interest. Grade II* are particularly significant buildings of more than special interest. Grade II are buildings of special interest, which warrant every effort being made to preserve them.
- 7.1.2 Sections 66 and 72 of the Act refer respectively to Listed Buildings and settings; and Conservation Areas.

7.2 National Planning Policy Framework

- 7.2.1 The Government issued the National Planning Policy Framework (NPPF) in March 2012 (DCLG 2012) and supporting Planning Practice Guidance in 2014 (DCLG 2014). This advice was updated in 2021.
- 7.2.2 One of the 12 core principles that underpin both plan-making and decision-taking within the framework is to '*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.*' It recognises that heritage assets are an irreplaceable resource and requires the significance of heritage assets to be considered in the planning process, whether designated or not. The contribution of setting to asset significance needs to be taken into account.
- 7.2.3 Section 16: *Conserving and enhancing the historic environment*, is key. The policies set out in this section relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.
- 7.2.4 Paras 189 – 208 inclusive refer:
189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- (Some World Heritage Sites are inscribed by UNESCO to be of natural significance rather than cultural significance; and in some cases they are inscribed for both their natural and cultural significance).*
190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:
- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
 - b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - c) the desirability of new development making a positive contribution to local character and distinctiveness; and
 - d) opportunities to draw on the contribution made by the historic environment to the character of a place.
191. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

192. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

193. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

7.2.5 Proposals affecting heritage assets are considered under para 194 on:

194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

196. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

197. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

198. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

7.2.6 Potential impacts are considered in para 199 on:

199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional⁶⁸.

(Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.)

201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

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

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

204. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

205. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

(Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository).

206. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

207. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

208. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

8 Determining significance

8.1.1 'Significance' lies in the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. Archaeological interest includes an interest in carrying out an expert investigation at some point in the future into the evidence a heritage asset may hold of past human activity and may apply to standing buildings or structures as well as buried remains. Known and potential heritage assets within the site and its vicinity have been identified from national and local designations, HER data and expert opinion. The determination of the significance of these assets is based on statutory designation and/or professional judgement against four values (EH 2008):

- *Evidential value*: the potential of the physical remains to yield evidence of past human activity. This might take into account date; rarity; state of preservation; diversity/complexity; contribution to published priorities; supporting documentation; collective value and comparative potential.
- *Aesthetic value*: this derives from the ways in which people draw sensory and intellectual stimulation from the heritage asset, taking into account what other people have said or written;
- *Historical value*: the ways in which past people, events and aspects of life can be connected through heritage asset to the present, such a connection often being illustrative or associative;
- *Communal value*: this derives from the meanings of a heritage asset for the people who know about it, or for whom it figures in their collective experience or memory; communal values are closely bound up with historical, particularly associative, and aesthetic values, along with and educational, social or economic values.

8.1.2 Table 1 gives examples of the significance of designated and non-designated heritage assets.

Table 1: Significance of heritage assets

Heritage asset description	Significance
World heritage sites Scheduled monuments Grade I and II* listed buildings English Heritage Grade I and II* registered parks and gardens Protected Wrecks Heritage assets of national importance	Very high (International/ national)
English Heritage Grade II registered parks and gardens Conservation areas Designated historic battlefields Grade II listed buildings Burial grounds Protected heritage landscapes (e.g., ancient woodland or historic hedgerows) Heritage assets of regional or county importance	High (national/ regional/ county)
Heritage assets with a district value or interest for education or cultural appreciation Locally listed buildings	Medium (District)
Heritage assets with a local (i.e., parish) value or interest for education or cultural appreciation	Low (Local)
Historic environment resource with no significant value or interest	Negligible
Heritage assets that have a clear potential, but for which current knowledge is insufficient to allow significance to be determined	Uncertain