



The
Heritage
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The Town and Country Planning (Appeals) (Written Representations
Procedure) (England) Regulations 2009

Appeal Statement of Case

London Borough of Camden Reference:

2021/3839/P

Site:

Howitt Close, Howitt Road, London NW3 4LX

Appellant:

Daejan Properties Limited

Subject of Appeals:

Erection of mansard roof extension to create 7 self-contained flats (Class C3)



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Heritage Appeal Statement of Case
Howitt Close, Howitt Road, London NW3 4LX

May 2023

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Appendix A Historic England's 'Reject at Initial Assessment Report' dated 23 March 2023



1 Introduction

1.1 This appeal statement of case relates to the refusal of an application for planning permission at Howitt Close, Howitt Road, London NW3 4LX. The application sought permission for “*Erection of a mansard roof extension to create 7 self-contained flats (Class C3).*” It is supplemental to the Statement of Case prepared by Freeths and should be read in conjunction with the various heritage and design reports submitted as part of the application.

1.2 Howitt Close is a three storey mansion block dating from 1933, located in the Belsize Conservation Area.

1.3 The Heritage Practice were instructed by Daejan Properties Limited on 4 May 2023 to produce a statement of case in relation to the heritage and design reason for refusal of planning application 2021/3839/P. The Heritage Practice were not involved in the preparation of the appeal scheme.

1.4 Planning application (2021/3839/P) was refused by the London Borough of Camden on 3 August 2022 for five reasons. **Reason for refusal 1** relates to heritage and design matters:

The proposed roof extension, by reason of its detailed design, bulk, massing, height, materials and undue prominence, would compromise the form, character and appearance of the host building and would thus harm the character and appearance of the streetscene and Belsize Conservation Area, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.

1.5 We consider the key heritage and design issues for consideration in this appeal to be as follows;

- The effect of the proposed roof extension on the form, character and appearance of the host building;
- The effect of the proposed roof extension on the streetscene and the character and appearance of the Belsize Conservation Area.

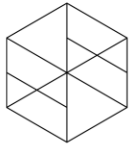


1.6 This statement will demonstrate that the proposed mansard is an appropriate design response in terms of its bulk, massing, height, materials and detailing, and relates sympathetically to the character of the host building. The proposed mansard responds positively to its surrounding context, reflecting prevailing roof forms. In views along Howitt Road and Glenilla Road, and in glimpsed views from Belsize Park Gardens the proposed mansard will sit comfortably in relation to the surrounding townscape, improving its appearance from some medium range vantage points. For these reasons, the proposals will preserve, and enhance, the character and appearance of the Belsize Conservation Area.

1.7 Howitt Close has been considered for statutory listing by Historic England however the building is not considered to be of sufficient quality or special interest. Their '*Reject at Initial Assessment Report*' dated 23 March 2023 is clear that the building is of only "*moderate architectural interest*", noting its "*rather old-fashioned*" style and lack of "*innovative design features*." (Appendix A).

1.8 This appeal is the culmination of a long period of negotiation and engagement with the Council, which is covered in detail in Section 3 – Relevant Planning History of the Statement of Case prepared by Freeths. In short, following two rounds of pre application discussions during 2020 the Council confirmed in their letter dated 7 December 2020 that they were satisfied that the proposed roof extension had a comfortable relationship with the host building. Further information was submitted in January 2021 to address design points raised by the Council and their response of 9 January 2021 refined the issues to be addressed at planning stage. However, during the determination of the subsequent planning application the Council reneged upon their heritage and design conclusions and the application was refused.

1.9 Against the background of the Council's volte face on their pre application advice, a revised application (2022/3635/P) was submitted by the appellant for '*Erection of roof extension to create 7 self-contained flats (Class C2)*'. This was presented to the Council's Members Briefing Panel on 9 January 2023 with an officer recommendation for approval. This is currently awaiting determination at full Planning Committee. This application is for the addition of a sheer brick additional storey to the building. Officers did not raise any objection to the principle of raising the height of the building with an additional floor of residential accommodation, considering that the resulting height, scale and massing of the building was acceptable, both in terms of the intrinsic



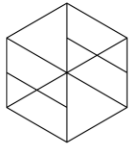
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character of the host building and the wider townscape. Thus, in relation to the current appeal, the profile and detailed design of the proposed additional floor remains the only outstanding design related area of disagreement between officers and the appellant.



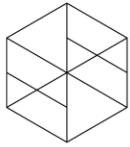
2 Site location and description

2.1 The following section provides a brief overview of the location, context and character of Howitt Close.

2.2 Howitt Close is a three storey 'L' shaped mansion block which was constructed in 1933. It sits at the southern end of Howitt Road, adjacent to the junction with Glenilla Road. The building is constructed of brown brickwork with red brick dressings and a rendered façade at 2nd floor level. The building has projecting square bays to most of its elevations and a flat roof with deep overhanging eaves. Windows are of painted metal in a variety of configurations. The main entrance is situated in the centre of the 'L' shaped plan. A fuller description and assessment of the building and its significance is included at section 5 of this appeal statement, with further information and photographs of the site and its context contained within the Heritage Statement prepared by Cotswold Archaeology and dated July 2021.

2.3 The area surrounding the appeal site is residential in character and was laid out over the former gardens of a large mid 19th century house, 'Woodlands', during the Edwardian period. Howitt, Glenmore, Glenilla and Glenloch Roads are lined with terraced housing, of two main storeys with prominent mansards. The houses are constructed of varying combinations of red brick and painted roughcast, with double height square bays. Tripartite arrangements of windows to the bays, with subdivided upper panes and decorative timber mouldings provide visual interest and articulation. The mansard storeys are an important element in the architectural composition of the buildings, with steep lower slopes, some of which retain their original decorative slate work. Large dormer windows are designed to reflect the fenestration pattern of the projecting bays below, with painted timber sash windows and heavily subdivided upper panes.

2.4 Howitt Road slopes down gently to the SW from Haverstock Hill, with Howitt Close positioned at the low point of the road. Mature street trees on the pavement to the north of the site and within the site itself significantly block views of the appeal building in views along Howitt Road. The continuous terraced housing along both sides of the road, the visible three storey character of the houses and the narrow width of Howitt Road creates a strong sense of enclosure to the townscape.



Heritage designations

The Belsize Conservation Area

2.5 The application site is located within the Belsize Conservation Area. The London Borough of Camden adopted their Belsize Conservation Area Statement in 2003. Due to the size of the designation and variations in its character, the conservation area is divided into six Sub Areas. The appeal site is located in Sub Area 4: Glenloch, the boundary of which is drawn tightly around the distinctive area of Edwardian housing on Howitt, Glenloch, Glenmore and Glenilla Roads. The Conservation Area Statement summarises this area as follows:

This is a distinct area of Edwardian terraced housing developed by the Glenloch Insurance Company close to Belsize Park Underground Station and Haverstock Hill. There is a clear change in character on entering this area from both Belsize Avenue and Belsize Park Gardens from the larger, grander, villa development to more modest family housing of a much smaller scale and tighter grain. These streets fall at a constant gradient to Glenilla Road which is flat.

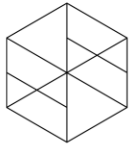
2.6 The Conservation Area Statement makes no explicit reference to Howitt Close however it is identified on the map at page 25 of the Statement and in the list on page 31 as a building which makes a positive contribution to the character and appearance of the conservation area.

Statutorily Listed Buildings

2.7 There are no statutorily listed buildings situated in close proximity to the appeal site.

Locally Listed Buildings

2.8 There are no locally listed buildings situated in close proximity to the appeal site.



3 Relevant planning history

A detailed planning history of the site can be found at Section 3 - Relevant Planning History in the Statement of Case prepared by Freeths.

1961

Planning permission (TP948/12543) was refused on 29 June 1961 for *'The construction of an additional floor at third floor level containing fourteen self-contained flats.'*

2023

Planning application (2022/3635/P) for *'Erection of roof extension to create 7 self-contained flats (Class C3)'* is recommended for approval by officers and referred to full Planning Committee following discussion at the Council's Members Briefing. A committee date for the application has not yet been set.



4 Relevant planning policy

National Planning Policy & Legislation

The Planning (Listed Buildings and Conservation Areas) Act 1990

4.1 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that:

“...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

4.2 The revised National Planning Policy Framework 2021 (NPPF) sets out the Government’s planning policies and how these are expected to be applied. There is a general presumption in favour of sustainable development within national planning policy guidance.

Paragraph 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.

Paragraph 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.

Paragraph 197

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

Paragraph 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.

Paragraph 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.

The London Plan

4.3 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. **Policy HC1 Heritage conservation and growth** part C is relevant.

C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Local Planning Policy

London Borough of Camden Local Plan 2017

4.4 Camden's Local Plan was adopted on 3 July 2017. Policies D1 and D2 were cited in the Council's reason for refusal 1. Only the relevant parts of these policies have been reproduced



below.

Policy D1 – Design

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

- a. respects local context and character;*
- b. preserves or enhances the historic environment and heritage assets in accordance with “Policy D2 Heritage”;*
- e. comprises details and materials that are of high quality and complement the local character;*
- f. 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;*
- m. preserves strategic and local views*

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.

Designated heritage assets

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.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. 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. The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*



Belsize Conservation Area Statement Guidelines (2003)

4.5 This document contains a number of area specific policies which are relevant to this appeal.

Materials and Maintenance

BE16

The choice of materials in new work will be most important and will be the subject of control by the Council.

Roof Extensions

BE26

Planning permission is required for extensions and alterations at roof level. Roof extensions and alterations, which change the shape and form of the roof, can have a harmful impact on the Conservation Area and are unlikely to be acceptable where:

- *It would be detrimental to the form and character of the existing building*
- *The property forms part of a group or terrace which remains largely, but not completely unimpaired*
- *The property forms part of a symmetrical composition, the balance of which would be upset*
- *The roof is prominent, particularly in long views*

Camden Supplementary Planning Guidance

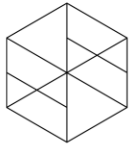
Camden Planning Guidance - Design (January 2021).

4.6 This document has various generic policies regarding new development within the Borough.

Paragraph 2.9

In order to achieve high quality design in the borough we require applicants to consider buildings in terms of:

- *context*
- *height*
- *accessibility*
- *orientation*



- *scale and massing*
- *siting*
- *functionality and layout*
- *detailing*
- *materials*

Paragraph 2.10

Development should respond positively and sensitively to the existing context

- *Development should integrate well with the existing character of a place, building and its surroundings*

Paragraph 2.11

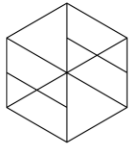
Good design should respond appropriately to the existing context by:

- *ensuring the scale of the proposal overall integrates well with the surrounding area*
- *carefully responding to the scale, massing and height of adjoining buildings, the general pattern of heights in the surrounding area*
- *positively integrating with and enhancing the character, history, archaeology and nature of existing buildings on the site and other buildings immediately adjacent and in the surrounding area, and any strategic or local views, vistas and landmarks. This is particularly important in conservation areas.*

Paragraph 2.14

Materials should form an integral part of the design process and should:

- *Be contextual – the texture, colour, pattern and patina of materials can influence the impact and experience of buildings for users and the wider townscape. The quality of a well-designed building can easily be reduced by the use of poor quality or an unsympathetic palette of materials. Decisions on the materials used in a development scheme should be informed by those used in the local area.*
- *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.*



Camden Planning Guidance – Home Improvements (January 2021)

4.7 The Home Improvements CGP 2021 contains a range of guidance with regard to roof extensions.

Section 2.2.2 **New roof level** relates to extending properties with a new storey at roof level.

The guidance confirms that:

There are two types of mansard roof extensions: a true mansard (A) and a flat topped mansard (B). In order to be designed successfully, you should follow the details below:

- *The lower slope (usually 60-70°) should rise from behind the parapet wall, separated from the wall by a substantial set back and gutter;*
- *Retention of roof features such as original cornice, parapet, and chimney stacks;*
- *Windows should respond to the fenestration character of the host building and generally project at right angle similar to a dormer window with timber sash openings; and*
- *Materials to complement the existing roof and building and respond to the neighbouring*

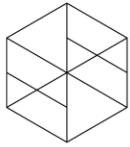
The guidance goes on say that:

There are certain considerations that should be taken into account when designing an additional roof level, to ensure it is sensitively and appropriately designed for its context. A new roof level should

- *Be subordinate to the host building;*
- *Include features informed by the host building and surrounding context;*
- *Take the form of a traditional mansard, a modern interpretation or a more innovative approach, supported by pre-application advice;*

This section also states that:

There are cases when an additional roof level could help re-unite a group of buildings and wider townscape. You should consider the scale of the adjacent development if proportionate to the host building and streetscene and reflect this into your proposal.



5 Historic development and significance of the site

5.1 This section is based upon information contained within the Heritage Statement July 2021 (PAD 13) and Heritage Technical Note January 2022 (PAD 18) prepared by Cotswold Archaeology.

5.2 The land where the appeal site is located was historically a district of open fields, dotted with dispersed farms and cottages as well as distinct nuclear settlements such as Hampstead village. On Roque's map of 1746 this rural landscape can be appreciated. The only notable development at this time was Belsize House, positioned adjacent to what is now Belsize Lane.

5.3 Whilst the area remained primarily as farmland up until the 1840s, it had already begun to increase in popularity during the late 18th and early 19th centuries, as City gentlemen and merchants built large individual villas, taking advantage of the spacious surroundings, fresh air, clean water supply and relative proximity to London. However, the area only began to develop in earnest during the mid 19th century when Belsize House was demolished, and its estate laid out with large stucco villas built for the upper and upper middle classes. These included Belsize Square, Buckland Road (now Crescent) and Saint Margaret's Road (now Belsize Park Gardens).

5.4 The 1866 Ordnance Survey map depicts the area that would eventually become Howitt Road. At this time the land formed part of the gardens of a large house known as 'Woodlands' constructed between 1864 and 1868 by a wine merchant, Basil George Wood.

5.5 By the 1915 Ordnance Survey map the Glenloch Insurance Company had laid out its streets of terraced houses to the SW of Haverstock Hill, including Howitt Road. The tight urban grain of these roads contrasted with the more substantial and spaciouly arranged detached and semi-detached villas of the earlier phase of development in the area, such as along Belsize Park Gardens to the south.

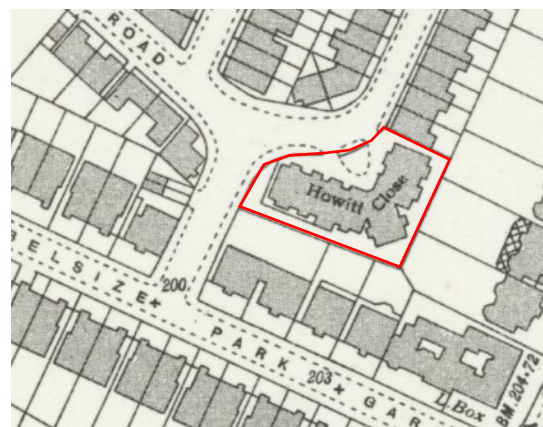
5.6 The future site of Howitt Close remained vacant at this time and appears to have been an undeveloped remnant of the former garden to 'Woodlands'. It is not clear why the houses along the east side of Howitt Road were not continued around the bend to the junction with Glenilla Road.



5.7 Directly to the south of this open piece of land were four large, detached villas at nos.38-44 Belsize Park Gardens. These had gardens of a similar depth to the semi-detached pairs to the west (see Figures 2 and 3).



Figure 1: The 1866 Ordnance Survey map showing 'Woodland's and its extensive gardens, with the position of Howitt Close marked with a red circle.



Figures 2 & 3: A detail of the 1915 Ordnance Survey map (left) and the 1935 Ordnance Survey map (right).

Architectural significance of the appeal building

5.8 Howitt Close was designed and constructed by Henry F. Webb & Ash in 1933.



5.9 The building is of three storeys with an 'L' shaped plan which takes advantage of the shape of the site and its relationship to Howitt Road. It is constructed in brown brickwork at ground and 1st floor levels, with a rendered façade to the 2nd floor. The building has a flat roof with a deep, moulded overhanging eaves.

5.10 The façades are articulated with square bays, with this toothed building line reflected at eaves level. Window openings have red brick dressings and fenestration takes the form of white painted metal subdivided casements. To the projecting bays the windows have a tripartite arrangement, with a wide subdivided unit flanked by slender single units. To the recessed portions of the façade there are paired single openings.

5.11 The main entrance is located in the inner elbow of the 'L' shaped footprint. The ground floor entrance door is set within a porch supported by paired Doric columns with large windows above at 1st and 2nd floor levels lighting the staircase. The name of the building is picked out on a rendered panel at 2nd floor level.

5.12 The western elevation is simpler, without projecting bays and fenestration of reduced complexity, offset in the centre to reflect the position of a second staircase.

5.13 Architecturally the building has a somewhat hybrid character. Its elevations were clearly designed to respond to its Edwardian context and are strongly influenced by their form and detailing. The articulation of Howitt Close's elevations reflects the rhythm and modulation of neighbouring historic buildings. The use of brick and render responds to the materiality of the adjoining dwellings and the use of full height square bays with tripartite windows emulates those on surrounding properties. The northern section of the block visually extends the adjoining terrace of houses on the east side of Howitt Road, and closes the views looking south, however it is physically separated and setback from the street frontage, maintaining a level of architectural autonomy. The style of the building is thus an interwar interpretation of the characteristics of the earlier Edwardian houses with subtle contrasts to differentiate it from the older houses. These include detailing around the main entrance and the deep overhanging eaves. The distinctive appearance of Howitt Close is not however, in our view, the result of its flat roof. Indeed, the projecting eaves detail and parapet level could easily conceal a shallow pitched roof profile.



5.14 At Howitt Close any Art Deco styling is extremely restrained, restricted to the moulded projecting eaves and minor decorative touches around the main entrance such as the metal balustrade and lead detailing to the 1st floor window, both of which are set above a traditional, classically inspired porch. The building has little in common with iconic buildings such as 2 Willow Road and the Isokon flats on Lawn Road, as cited by various objectors to the proposals, where historicist styles were rejected in favour of Continental influences, fully rendered facades, streamlined features and innovative spatial planning. At Howitt Close, the red brick dressings to the windows, with their heavily subdivided vertically proportioned panes, hint at the neo-Georgian styling which widely used on London County Council mansion blocks of the period (see the tripartite window arrangement at figure 4). What is most notable is how strongly the building relates to its surrounding context, with only hints of more innovative and fashionable architectural trends.



Figures 4 & 5: 1930s neo-Georgian mansion block on the Black Prince Estate in Lambeth (left) and Camelot House, Camden.

5.15 The building was assessed for statutory listing by Historic England and their 'Reject at Initial Assessment Report' dated 23 March 2023 and included at Appendix A of this Statement is clear that "Although it exhibits a sympathetic and competent design, clearly intended to *harmonise with the surrounding Edwardian housing*, it is, as a result, rather old-fashioned in style despite some Art-Deco touches, and does not display any innovative design features which would provide special interest in a national context."

5.16 In their objection to the application The Belsize Society seek to compare Howitt Close with Elm Park Court in Pinner, designed in 1936 by the same architect and now Grade II listed



(Figure 5). Whilst the three storey massing of Elm Park Court is similar to Howitt Close, the similarities end there. Elm Park Court is fully faced in render, with horizontally proportioned balconies and most importantly, a highly prominent roofscape, with green glazed pantiles and tall rendered slab chimneys.

5.17 The Belsize Society refer to Henry F. Webb of Webb & Ash, who were the architects of Howitt Close, as a “...*highly regarded architect*.” As noted in the Heritage Technical Note prepared by Cotswold Archaeology and dated January 2022, Webb only ever achieved Licentiate membership within the Royal Institute of British Architects (RIBA), a class for practitioners who had not completed the relevant architectural examinations and were not eligible for fellowship. Ash did achieve Fellow status, but not until 1938, some 5 years after Howitt Close was built. Indeed, Historic England’s ‘Reject at Initial Assessment Report’ is clear that “...*the architects, Henry F Webb and Ash, were proficient commercial architects specialising in apartment blocks in London, but are of regional rather than national interest.*”



Figure 5: Elm Park Court, Pinner

5.18 The appeal building sits at the southern end of Howitt Road and closes the view looking south as Howitt Road bends to meet Glenilla Road. However, due to the downward sloping

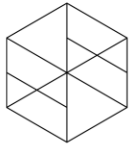


topography of Howitt Road, the building sits lower within the townscape than the surrounding houses. In summer views much of the façade and roofscape are obscured by mature street trees on the pavement to the north of the site. During the winter months the building merges with the roofscape of the houses to the rear on Belsize Park Gardens and sits in the foreground of very tall and bulky modern development to the south in Swiss Cottage, making its flat roof hard to discern. Close to the building the deep overhanging eaves provide a visual 'lid' to the building, however it is in medium range views where the combination of the flat roof and the traditional facades of the building appear somewhat unresolved. In closer winter views the building sits demonstrably lower in the streetscene than the houses at the southern end of Howitt Road.

5.19 The secondary, western façade of the building is visible from Glenilla Road looking east. From this perspective the unusual and slightly incongruous contrast between the flat roof of the building and the much more traditional architectural expression of its facades is particularly pronounced. Secondary views of the rear façade are possible from the southern section of Glenilla Road looking north however the intervening tree cover is dense and the roofscape of the building is not a prominent feature.

Conclusion

5.20 Historic England describe the building as being of 'moderate architectural interest' and of a 'sympathetic and competent' design. What is perhaps most notable about it, is the degree to which it reflects its surrounding Edwardian context, despite being constructed nearly 30 years after the surrounding houses. This includes the use of full height bays to articulate the facades, traditional subdivided windows and a sympathetic use of brick and render banding to the elevations. Any Art Deco touches are very modest, restricted to the projecting eaves detail and a few elements around the main entrance and overall, it lacks architectural innovation or evidence of more avant garde influences. The flat roof design merges with the surrounding townscape in views south along Howitt Road but from Glenilla Road, the western flank elevation is more exposed, and the flat roof provides an unresolved termination to the composition. As noted in Historic England's report, the building does not display any technological innovation in terms of its materials or construction, nor does it have any historical association with nationally important people or events.



6 Consideration of the issues

6.1 The following section will describe the proposals and their impact upon the host building, the surrounding townscape and the character and appearance of the Belsize Conservation Area. The degree of compliance with the relevant statutory, national and local conservation policy framework will be assessed.

6.2 The proposals are for the addition of a mansard storey to the building to provide 7 new residential units on the site. The proposed mansard is 3.3m in height and faced in red clay tiles. The dormers will be constructed with standing seam zinc panels to their cheeks and fitted with grey double glazed steel windows.

Principle of a mansard storey / Terminating roof storey

6.3 The appellant undertook pre application discussions with the Council in 2020 regarding proposals for a mansard storey to Howitt Close. The Council noted in their formal pre application letter dated 12 May 2020 that *"The building is terminated with overhanging eaves and a flat roof, a unique feature of the building. At the same time however, a different roof form on the building could be possible. If this building were to be able to accommodate a roof extension, its design would need to be informed by a deep understanding of the building, its architectural style and composition with attention paid to every detail in order to ensure a high quality and appropriate response."* Ongoing negotiations took place and by 7 December 2020 the Council confirmed that *"The progress that has been made throughout the pre-application process is encouraging and the form of the roof extension now has a more comfortable relationship with the host building...the mansard's response to the chamfered eastern corner is now thought to be a successful one"*.

6.4 The Council's delegated report in relation to the appeal scheme acknowledges that the principle of development is acceptable (para 3.2) and that it would be *".....very challenging though not necessarily impossible to extend the building upwards without causing harm to both the character and appearance of the host building itself and also the wider area, including the Belsize Conservation Area"* (para 5.8).



6.5 A subsequent planning application (2022/3635/P) was made by the appellant for an additional floor to the building, expressed in brickwork and with a flat roof. This proposal received officer support and progressed to the Council's Members Briefing panel on 9 January 2023 with a recommendation for approval. The application was subsequently referred to full Planning Committee, with a date not yet set for its consideration.

6.6 Thus it is clear that Council officers do not consider the building incapable of upwards extension or that its character, typology and surroundings are so sensitive that a change to its appearance and an increase in its height would be fundamentally unacceptable. Given the officer support for the addition of an additional brickwork floor to the building, the remaining areas of difference between the Council and the appellant relate to the expression, profile and detailed design of the additional floor.

6.7 The Council's delegated report raises concerns regarding the principle of replacing the current flat roof of the building with a new mansard and the impact that this would have upon its intrinsic architectural character, noting at paragraph 5.14 that *".....the existing flat roof is characteristic of inter-war development and therefore aids in the legibility of the application building."* It is not disputed that flat roofs are a defining feature of Modernist and Art Déco architecture of the 1930s. However, as outlined in section 5 above, the most notable characteristic of Howitt Close is the extent to which it reflects its surrounding context, despite being constructed up to 30 years later than these terraced houses. This is reiterated by Historic England in its rejection of an application to statutorily list the building, stating that Howitt Close was, *"....clearly intended to harmonise with the surrounding Edwardian housing."*

6.8 Flat roofs are not ubiquitous on inter-war mansion blocks and there are many examples of buildings of this period where the roofscape is a prominent and celebrated element in their architectural composition, for example the extensive estates of neo-Georgian blocks which were constructed by the London County Council during the 1930s (figures 4 & 5 for example). Visibly expressed roofs also form part of the architectural composition on many other types of interwar blocks, of varying architectural design and expression. Given the wet climate of the British Isles, architects were less inclined to adopt the flat roofs of more avant garde architecture of the 1930s.



6.9 The building was originally designed with a flat roof, and it is accepted that this was a conscious choice by the architect at the time. However, in many views of the building, particularly from Glenlla Road the building has a rather hybrid character compounded by the juxtaposition between the flat roof and the traditional articulation and detailing of the facades below. Its slightly uncomfortable proportions stem from the combination of its relatively large footprint but only three storey massing, which alongside the flat roof leaves its appearance as slightly unresolved in architectural terms.

6.10 The Council seek to demonstrate at paragraph 5.5 of their delegated report that there is nothing incongruent about the appearance of Howitt Close because there are other flat roofed inter war blocks of flat elsewhere within the conservation area, including on Glenmore and Glenilla Road. Officers conclude that *"Flat roofed inter-war blocks of flats are therefore part of the prevailing character of this part of the conservation area."* However, these buildings are noted as neutral contributors, or negative in the case of Sussex House on Glenilla Road, to the character and appearance of the Belsize Conservation Area. The Council's reasoning is flawed. Buildings which they have identified as making no contribution, or actively detracting from the character of the conservation area, cannot reasonably be considered to form part of its prevailing character in a positive sense, if their appearance and form are not of notable significance and they do not have features of value which are worth preserving. By contrast, Howitt Close is identified as a positive contributor because of the degree to which it responds architecturally with its surrounding Edwardian context.

6.11 The Council appear to place undue weight upon the fact that *"...the existing building has remained largely unaltered since its initial construction and therefore the flat roof forms part of the established character of the streetscene and local area"* (paragraph 5.14). This approach could imply that change is therefore not possible if a building or feature have been in place for a notable period of time. This is clearly not the case. Buildings can, and do, evolve and mansard roofs and roof additions are very common modifications to buildings of varying age, character and typology. Many 18th and 19th century buildings have had mansards added to them without causing harm - a feature which is generally appropriate for this building typology and can be found as part of the original design of buildings from that period.



6.12 Equally, visible roofscapes, including mansards are a common original feature on 1930s mansion blocks of varying styles and typologies, and there is nothing incongruous 'in principle' about an expressed roofscape. This not only applies to mansion blocks with a neo-Georgian or more traditional architectural character, but also to those with Moderne or Art Deco styling. These include the examples are shown below:

Fig 6: Ossulton Estate (1927-1931) in Somers Town which is Grade II listed (LB Camden) with facades inspired by Viennese modernism and characterised by their render finish and streamlined horizontality.

Fig 7: Stourcliffe Close, Stourcliffe Street, near Marble Arch (Westminster City Council), with subtle Moderne detailing to the main entrance and replacement windows which replicate the horizontality of the original Crittal windows.

Fig 8: Belsize Court on Wedderburn Road (1937) in the neighbouring Fitzjohns/Netherhall Conservation Area (positive contributor). All of the buildings at Figures 6-8 have prominent mansard roofs as part of their original architectural composition, notably in bright red clay tiles and green glazed pantiles.

Fig 9: Dorchester Court, Sloane Street, RBKC.

Fig 10: 25 Cheyne Place, RBKC.

Fig 11: Nell Gwynn House, 1937, Sloane Avenue RBKC. Distinctive Art Deco mansion block with deep set parapet eaves and habitable mansard roofs, all dating from the interwar period.

Fig 12: Pinner Court, grade II listed Built: 1935 – 1936. Distinctive hacienda style art deco block. Pinner Court and the neighbouring Capel Gardens are situated on the Pinner Road, a few minutes drive from Elm Court (figure 5). They were both designed by local architect H J Mark. Pinner Court comprises two L-shaped building. Each building is brick-built with white render and comprises three-storeys. Each building features a green pantiled, hipped roof. The roof has a deep overhang.



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Heritage Appeal Statement of Case
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May 2023



Fig 6



Fig 7



Fig 8



Fig 9



Fig 10

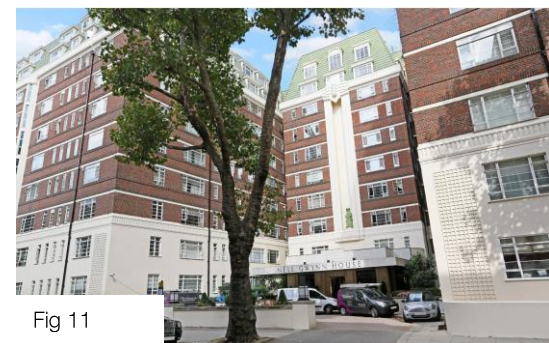


Fig 11



Fig 12



Effect of the proposals on the host building

6.13 The proposals are for a mansard roof across the footprint of the building. This will have sloping sides and a very low-pitched roof top in order to shed rainwater. The lower slopes will be clad in plain clay red roof tiles which will reflect the tone of the red and brown brickwork on the facades below. The mansard will be set well back behind the main building line, allowing the projecting bays and the articulation at eaves level to remain prominent features.

6.14 The proposed mansard has been designed to sit comfortably in relation to the host building as well as its surrounding context of red brick Edwardian houses. Mansard roofs are a consistent feature of the terraced houses which line Howitt Road, Glenloch Road and Glenilla Road and their steep lower slopes and prominent fenestration are highly visible elements within the streetscene.

6.15 The new residential units will be lit by a series of dormer windows which have been designed to respond positively to the fenestration on the main facades of the building. The layout of the new units follows the hierarchy of fenestration to the floors below, with the larger dormers denoting main living spaces and the singular windows serving secondary spaces. Above the projecting bays the windows will have a matching tripartite arrangement, flanked by narrow lights. To the recessed portions of the façade there will be single lights, aligned with the windows beneath them. All the windows will have horizontal glazing bars to break down the extent of glazing and to reflect the fine subdivision of the original windows below, with the slender framing to the dormers intended to reference the brickwork detailing around the original window apertures. The dormers will be clad in standing seam zinc panels whilst the window units themselves will be polyester powder coated double glazed steel windows in grey. This reflects the materiality of the steel windows on the host building.

6.16 The setback position of the proposed mansard and its sloping profile will ensure that the roof addition responds positively to the scale and proportions of Howitt Close, appearing as a subordinate feature within the overall composition and reflecting the arrangement of mansards on surrounding residential buildings. The chamfered NW corner of the building is replicated in the form and profile of the proposed mansard. The projecting eaves detail to the building is considered



an important decorative detail and the setback position of the proposed mansard will fully respect this, allowing it to remain a key feature in terminating the lower sections of the façade.

6.17 A series of photovoltaic panels are proposed for the roof of the new mansard. These will be set towards the rear of the plan. These have a minor projection from the roof but will not be readily visible from street level due to the height of the building, except in some longer views south along Howitt Road. Photovoltaic panels also form part of planning application 2022/3536/P which is currently awaiting consideration by the Council at full Planning Committee and which has officer support. The Council's committee report discusses the proposed photovoltaic panels at paragraph 6.46 and concludes that *"...given their size and siting and the distance over which they would be viewed, it is not considered that the solar PV equipment would detract from the character and appearance of the host building, or the wider area. Any harm caused by the solar PV equipment would be outweighed by the benefits provided in terms of renewable energy generation."*

6.18 The Council raise concerns in their delegated report at paragraph 5.11 regarding the choice of materials for the proposed mansard, noting that *"...the existing building features two brown brick storeys below a white rendered third floor. The introduction of clay tiles above the rendered third, 'top' floor is not considered to be appropriate to the style or historical development of the host building."* This is a curious objection given that there are many buildings in the surrounding area that have a tiled or slated mansard roof above a painted and rendered/roughcast upper storey. This arrangement can be seen directly opposite the appeal site at nos.60 and 62 Howitt Road (see Figure 13). Indeed, there is nothing fundamentally incongruous about this combination of materiality and many domestic buildings of the 1930s have precisely this arrangement, with a roughcast or rendered 1st floor facade set above brickwork and topped with a clay tile clad roof (see Figure 14).



Figures 13 & 14: No.60 Howitt Road (left) and a typical 1930s house with a brick ground floor, render at 1st floor level and a clay tiled roof (right).

6.19 The Council conclude at paragraph 5.13 of their delegated report that the proposed mansard roof would not enhance the character and appearance of the conservation area *“.....because the proposed design of the mansard has not been properly reconciled with the scale, proportions and original design of the host building. The proposed mansard roof is considered to be overly tall and top-heavy; many of the dormers equal, and in some cases exceed, the width of the principal windows on the façade below, resulting in further disruption to the architectural cohesion of the building.”*

6.20 The appellant strongly refutes this assertion. The design of the proposed mansard has been carefully formulated to respond to and reflect the articulation, form, materiality and detailed design of the main facades of the host building. The mansard will be proportionate in terms of its height and scale to the three storeys of the host building, and the setback position and sloping profile of the mansard, not easily appreciated on the flat elevation drawings, will ensure that the mansard appears visually subordinate. The size and arrangement of the dormers specifically follows the rhythmic pattern of the façade below and reflects the dominant pattern on the surrounding Edwardian buildings. Here the dormer windows are a prominent component in the architectural composition and broadly match the width of the fenestration at ground and 1st floor level.

6.21 The Council's stance in relation to the appeal scheme is in sharp contrast to their conclusions in December 2020, following lengthy engagement and discussion with the appellant regarding a proposed mansard roof. The possibility that an alternative roof form could be incorporated on the building was explicitly confirmed in their pre application letter dated 12 May



2020 and by their letter of 7 December 2020, the progress made regarding the design of the mansard was noted as “*encouraging*.” The proposed roof extension was confirmed to have “*a more comfortable relationship with the host building*”, clearly implying that the principle of an upwards extension was acceptable. Subsequent supplementary information submitted to the Council in January 2022 narrowed the issues for consideration down to the design of the dormers and materiality.

Effect of the proposals on the character and appearance of the Belsize Conservation Area

6.22 The Council's delegated report discusses the s.72 duty in the Planning (Listed Buildings and Conservation Areas) Act 1990 and comments at paragraph 5.12 that “*The works would not preserve the character and appearance of the area because there is a perceptible change. As such, this assessment must consider whether the proposals would enhance the character and appearance of the conservation area.*” This is an incorrect interpretation of the s.72 statutory duty and demonstrates a lack of understanding of longstanding case law. *South Lakeland District Council v Secretary of State for the Environment and another* [1992] 1 ALL ER 573 established that a conservation area would be preserved, even if it was altered by development, if its character or appearance was not harmed¹. Thus, the s.72 test can be met by development which preserves (ie: changes without harming) the character and appearance of a conservation area and there is no statutory requirement for enhancement.

6.23 It is acknowledged that the proposed mansard would be visible within the streetscene, however it considered that its design is appropriate for the host building and contextual in terms of the character of the surrounding area. The Council's conclusion at paragraph 5.14 of their delegated report is that the proposals “*...neither repair nor restore any previous historical condition, nor do they help better reveal or enhance the existing historic or architectural character of the area. As such, officers do not consider that the proposed works would enhance the character and appearance of the streetscene or Belsize Conservation Area.*” There is no statutory requirement for development to repair or restore any previous historical condition, or to better reveal the existing historic or architectural character of the area in order to preserve the conservation area. Notwithstanding that, the proposed mansard is considered to improve the

¹ Historic England website – Legal requirements for Listed Building and other Consents
[https://historicengland.org.uk/advice/hpg/decisionmaking/legalrequirements/#:~:text=However%2C%20the%20House%20of%20Lords,other%20words\)%20was%20not%20harmd.](https://historicengland.org.uk/advice/hpg/decisionmaking/legalrequirements/#:~:text=However%2C%20the%20House%20of%20Lords,other%20words)%20was%20not%20harmd.)



appearance of Howitt Close from some medium range vantage points, particularly on Glenilla Road, utilising a form of roofscape which is widely used on building of this age and typology.

6.24 Overall the proposed addition at roof level is considered appropriate in terms of its position, height and massing and will be visually subordinate to the host building as a result of its set back position, sloping profile and mansard appearance. The proposed additional height to the building can be absorbed within its surrounding context and the mansard form itself is directly reflective of the vast majority of houses within this Edwardian residential enclave. Its materiality and detailed design have been informed by the existing character of the building, its articulation and the arrangement of its fenestration. Key features such as the projecting moulded eaves line will be retained and will remain a prominent feature. For these reasons the proposals are not considered to cause any harm to the character and appearance of the Belsize Conservation Area. In many respects the proposed mansard will improve the overall balance and proportions of the existing building, where its flat roof currently contributes to its rather squat appearance.

Views Analysis

6.25 The Belsize Conservation Area Statement identifies important views within each Sub Area. For Sub Area 4 these are limited to a single vantage point identified as '*St Paul's Cathedral, St Stephens and Christchurch can be seen from Haverstock Hill.*' This does not affect any views of Howitt Close from the surrounding townscape.

Howitt Road looking SW

6.26 The Council assert at paragraph 5.11 of their delegated report that the proposed mansard would *"....change the shape and form of the existing roof significantly as the roof is prominent, particularly in long range views along Howitt Road and from the junction with Glenilla Road."*

6.27 It is accepted that the proposed mansard will add height to the building and alter its profile. However, this is not necessarily harmful. At present the appeal building closes the view looking south along Howitt Road. However, due to its sloping topography Howitt Close sits at a low point in the townscape, with its eaves level set below the height of the surrounding terraced houses in long and medium range views. Within this context, the proposed additional height of the mansard



can be absorbed without any harm to the streetscene. In these long and medium range views, particularly the further one moves away from the appeal building, the roofscape of the houses at nos.38-44 Belsize Park Gardens form a backdrop directly behind the appeal site, with tall blocks of modern development further south at Swiss Cottage featuring prominently. This existing built form in the background of views lessens the ability to appreciate the current flat roof of the building and would reduce any visual impact from the proposed mansard.

6.28 In much closer views along Howitt Road, the proposed mansard would read as a subordinate addition to the building and would not dominate its surroundings, aligning visually with other mansard roof storeys on houses further to the north (see Figure 11). Its impact would also be lessened due to its setback position from the road, behind a generous front garden area. The filtering and obscuring effect of the mature street trees to the north of the appeal site in the summer months would be significant from all long, medium and short range vantage points.



Figure 15: A photomontage of the proposed mansard reproduced from the Design & Access Statement (dated 5 August 2021) submitted in support of the original planning application.



Figure 16: A view looking SE along Glenilla Road towards the western elevation of the appeal building.

Glenilla Road looking SE

6.29 From vantage points along Glenilla Road the contrast between the flat roof of the building and its traditional facades, and the impact that this has upon its proportions, are most appreciable. The flat roof of the building seems particularly out of character with the surrounding Edwardian houses in this perspective. The proposed mansard would terminate the building in a visually appropriate manner, with dormer windows aligned with the fenestration beneath, a set back from the main building line and a chamfer to the mansard to match the profile of the NW corner of the building. From these vantage points the proposed mansard would be seen within the context of steeply pitched roofs and mansards on the surrounding Edwardian buildings. A mature street tree would conceal views of the main NE and NW elevations of the building which face onto Howitt Road (Figure 15).

Glenilla Road looking NE

6.30 Views from here would pick up the western elevation of the building and parts of the rear façade, however these are heavily affected by dense tree cover in the summer months. From these perspectives the current roofscape of the building is not readily appreciable. When visible the proposed mansard would sit appropriately in its context, given the substantial scale of the houses at nos.38-44 Belsize Park Gardens., with three storeys plus a visible roofscape. The



proposed mansard would also relate positively to the abundance of original mansards on the surrounding Edwardian terraced houses which form the setting to the appeal building.

Belsize Park Gardens looking NE

6.31 Any views from Belsize Park Gardens would be primarily of the western elevation of the appeal building. The sightlines from here towards the rear of the building are very narrow and the mature tree cover would block views of this façade during the summer months. The substantial scale of the villa at no.38 Belsize Park Gardens sits in the foreground of views towards the appeal site and the high quality mid 19th century streetscape along Belsize Park Gardens, dominated by its stucco fronted villas channel views away from the appeal building.

Impact on nos.38-44 Belsize Park Gardens

6.32 The Belsize CAAC asset that Howitt Close was built over the rear gardens of the mid 19th century villas at nos.38-44 Belsize Park Gardens and that they “...*originally sat in a large garden.*” This is not the case and a correct assessment of the historic development of the site has been included in a footnote within the Council’s delegated report, noting that “*A number of consultation responses have suggested that Howitt Close was built within the original rear gardens of properties on Belsize Park Gardens; however, historical maps don’t appear to demonstrate this. It appears that the plot of land went from being a field to being a vacant site.*” The relevant extracts from the 1915 and 1935 Ordnance Survey maps can be seen at Figures 2 & 3 of this Statement.

6.32 Thus the Belsize CAAC’s assertion that “*This series of ‘villas’ is unique and as such should be acknowledged with their outlook and surroundings protected as part of the conservation area. Howitt Close as it stands fills up the original gardens of the ‘villas’*” should be given no weight as their assessment of the historic development of the buildings is not factually correct. The Belsize CAAC also suggest that the proposed mansard “...*would significantly diminish long views from the four ‘villas’.*” Presumably this is referring to views north up Howitt Road from the rear windows of the houses at nos.38-44 Belsize Park Gardens. Given the sloping topography of the road up towards Haverstock Hill and that the current building reaches up to the eaves level of the villas at nos.38-44 Belsize Park Gardens it is not considered that the proposed mansard would diminish views from these properties.



Assessment of the proposals against the statutory duties and the national and local policy framework

The Planning (Listed Buildings and Conservation Areas) Act 1990

6.34 The main issues for consideration in relation to this application are the effect of the proposals on the character of the host building and thus upon the character and appearance of the Belsize Conservation Area. The relevant statutory provision in relation to these matters is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 at section 72.

6.35 As outlined at paragraph 6.21 above the Council have interpreted the s.72 duty of the Act incorrectly, concluding that the proposed development changes the appearance of the building perceptibly and that it therefore cannot preserve character or appearance. This is a fundamentally flawed position and affects the validity of their assessment of the proposals and their eventual conclusions.

6.36 The proposals will cause no harm to the character and appearance of the Belsize Conservation Area. From some vantage points, particularly along Glenilla Road, the current building has rather unusual proportions and an unresolved character, which derives from its flat roof and the contrast between this feature and its otherwise traditional elevations. The proposed mansard will resolve this to a degree and has been designed carefully to respond to the surrounding context of prominent mansards and to reflect the key characteristics of the host building. The additional height can easily be accommodated on the site, given its position in the townscape, setback from the road and the height and scale of surrounding buildings. Consequently, the proposals preserve, and enhance, the character and appearance of the conservation area, in line with the s.72 duty of the Planning (Listed Buildings and Conservation Area) Act 1990.

National Planning Policy Framework 2021

6.37 The proposals are also considered to accord with the provisions of the National Planning Policy Framework 2021. In line with paragraph 130, the proposals will add to the overall quality of the area, are visually attractive, sympathetic to the surrounding built environment and optimise the



potential of the site to sustain an appropriate mix of development. In compliance with paragraphs 195, 197 and 199, the proposals will preserve the character and appearance of the surrounding conservation area through the sensitive adaptation of the building. The proposals will utilise a design approach which reflects and reinforces local context and distinctiveness. The proposed works will provide seven new high quality residential units, optimising the viable use of the building and promoting economic vitality via new residents who will contribute towards the local economy.

6.38 Paragraph 202 of the NPPF requires any 'less than substantial harm' to be weighed against the '*public benefits of the proposal including, where appropriate, securing its optimum viable use.*' The Council consider that the proposals cause 'less than substantial harm' to the character and appearance of the Belsize Conservation Area. They identify only two public benefits - the provision of additional permanent, self-contained housing in the borough and the financial contribution to affordable housing – but conclude that these do not outweigh their identified harm.

6.39 The appellant disputes this conclusion. Firstly, the proposals are not considered to cause harm to the character and appearance of the Belsize Conservation Area. If any minor harm is identified by the Inspector, then it is suggested that the public benefits which flow from the proposals would outweigh this harm. These include:

- Improvements to the unresolved and slightly discordant appearance of the existing building to the benefit of the streetscene and surrounding conservation area;
- The provision of new residential units;
- A contribution towards affordable housing;
- Sustainability and energy use improvements to the building through the installation of PV panels to the roof;
- The contribution of new residents to the local economy.

6.40 The Council confirm at paragraph 7.1 of their committee report relating to planning application 2022/3635/P, as yet undetermined, that "*If however, members take the view that the proposed works would cause harm to the character and appearance of the Belsize Conservation Area, officers are of the view that the public benefits of the proposal, namely the provision of 7 permanent, self-contained dwellings and the financial contribution towards affordable housing elsewhere in the borough, would outweigh the harm.*" Given that this proposal differs from the



appeal scheme only in terms of its detailed design, and not with regard to the principle of extending the building upwards, it must follow that the public benefits identified hold demonstrable weight.

6.41 Specifically in relation to the proposed PV panels, the Council confirm that “Any harm caused by the solar PV equipment would be outweighed by the benefits provided in terms of renewable energy generation” (Committee Report 2022/3635/P). Given the similarity of the proposals for PV panels across both applications the same balanced judgement should apply.

The London Plan 2021

6.42 The proposals are also considered to comply with the adopted London Plan 2021. The thrust of policy HC1 (Heritage conservation and growth) is that the significance of heritage assets should be conserved. Development proposals should avoid harm and identify enhancement opportunities early on in the design process. In this case the proposed mansard roof will conserve the significance of the host building through its sensitive adaptation.

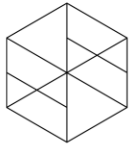
Local Policy

London Borough of Camden Local Plan 2017

6.43 The proposals have also been assessed against relevant policies contained within the London Borough of Camden Local Plan 2017. Overall, there will be no harm caused to the character and appearance of the Belsize Conservation Area and the relevant Local Plan policies are complied with.

Policy D1: Design

The proposed mansard is an appropriate typology for an interwar mansion block and there are numerous examples of buildings of this character which have prominent and celebrated roofscapes. Furthermore, the mansard typology is a defining feature of the surrounding Edwardian houses, where the uppermost storey of the buildings is celebrated, with steep slopes, original decorative slates and well detailed and generously scaled dormer windows. The mansard has been specifically designed to respond to key characteristics of the host building, including its materiality, fenestration and the prominence of its projecting eaves line. Its setback position and sloping profile will ensure that it appears visually subordinate to the host building. Overall, the



proposals are considered to preserve, and enhance, the character and appearance of the Belsize Conservation Area. The appearance of the building will change but it is considered that this can be absorbed into the surrounding townscape as evidenced by the analysis of key viewpoint at paragraphs 6.23-6.30 of this Statement.

Policy D2: Heritage

The proposals are considered to preserve, and enhance, the character and appearance of the Belsize Conservation Area. Sub Area 4 of the Belsize Conservation Area has a distinctive Edwardian character which the 1930s Howitt Close development sought to reflect in its materials, detailing and façade articulation. In ensuring that new development responds to its immediate surroundings and context, the proposed mansard is considered to be sympathetic and will integrate well with the prevailing pattern of highly visible mansard storeys. Although it is contended that no harm is caused to the conservation area, the proposals will deliver a range of demonstrable public benefits which are outlined at paragraph 6.35 above.

Belsize Park Conservation Area Statement Guidelines (2003)

6.44 The Belsize Park Conservation Area Statement contains a number of guidelines which are applicable to this appeal. The proposals are considered to comply with the thrust and detail of these guidelines.

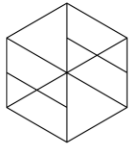
BE 16 – Materials and Maintenance

For the reasons outlined at paragraph 6.17 of this Statement, the appellant refutes the suggestion that the introduction of clay tiles above a rendered ‘top’ floor is in any way inappropriate, as suggested at paragraph 5.11 of the Council’s delegated report. The proposed materials are considered to be fully appropriate and contextual.

BE26 – Roof Extensions

This policy outlines a number of scenarios where a change to the shape and form of the roof of a building would not be acceptable.

- In this case the mansard will change the profile of the building but for the reasons outlined in detail in this statement it would not be harmful to the form or character of the building. Howitt Close is visible in long views down Howitt Road and Glenilla Road, however, the



existing street trees would have a significant impact on the ability to appreciate the roof extension in long and medium range views.

- Whilst the proposed mansard would be visible in closer views, this is not necessarily harmful and conservation areas can accommodate change, provided that it is sensitively designed and detailed as is the case here.
- The mansard here will be applied across the entire building and will respond to the regular and rhythmic pattern of its façade.
- The Council confirm at paragraph of their Committee Report in relation to planning application 2022/3536/P that “...the application building does not form part of a group or terrace, it is a standalone building. Therefore, the proposed changes would not impact detrimentally on a group of uniform buildings.”

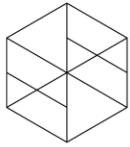
Camden Supplementary Planning Guidance

Design (January 2021)

6.45 The proposals are considered to comply with the thrust and detail of this guidance. Key parameters such as context, height, scale, massing, details and materials have been considered and are considered to sympathetically reflect surrounding buildings. Howitt Close is the only interwar block within Sub Area 4 of the Belsize Conservation Area which is considered to make a positive contribution to its character and appearance, and this largely derives from its contextual use of materials, façade detailing and articulation. Thus, the proposed mansard is considered to respond positively to the predominant roof form within the Sub Area and the degree to which mansards and their dormer windows are prominent features within the streetscene. Its scale, form, rhythmic pattern of fenestration and the use of traditional material will ensure that overall, the proposed mansard will integrate well with the existing character of this distinctive enclave of Edwardian architect.

Home Improvements (January 2021)

6.46 The proposals are considered to comply with the thrust and detailing of this guidance, in particular, section 2.2.2 (New roof level). This requires new mansards to be setback and to retain roof features such as original cornice. Here the overhanging eaves detail would be



maintained as a prominent feature and the mansard would be set back well behind the building line, providing a sense of visual subordination and ensuring that the articulation of the full height bay windows remains fully appreciable below. The use of clay tiles will ensure that the mansard has a traditional appearance and the alignment of the dormers with the fenestration on the main facades references the host building and the surrounding context.

6.47 Paragraph 2.2.2 is clear that “*There are cases when an additional roof level could help re-unite a group of buildings and wider townscape.*” One of the key features of Howitt Close is the degree to which its design reflects its surrounding Edwardian townscape, despite its interwar construction date. The proposed mansard is considered to reinforce that visual and architectural connection with its surroundings whilst also responding to the particular characteristics of the building itself.



7 Conclusion

7.1 This appeal statement relates to proposals for a mansard roof, providing seven new residential units at Howitt Close, Howitt Road, London NW3 4XL.

7.2 The appellant has sought to engage with the Council since February 2020 regarding proposals for the appeal site. After extensive negotiations during 2020 officers confirmed that the form of the proposed roof extension “...now has a more comfortable relationship with the host building.” Thus, there was no ‘in principle’ objection to the upwards extension of Howitt Close and only matters of detailed design to the dormers and materiality remained outstanding.

This position was however reneged upon during the determination period for the appeal scheme, with the Council citing local objection as the reason for their volte face. Clearly the Council still maintain their position of no ‘in principle’ objection to a roof extension on Howitt Close, evidenced by their officer support for application 2022/3635/P which was presented to the Council’s Members Briefing panel on 9 January 2023 with a recommendation for approval.

7.3 Howitt Close is a building of modest significance, as confirmed by Historic England in their ‘Reject at Initial Assessment Report’ dated 31 March 2023. Whilst it is acknowledged to make a positive contribution to the character and appearance of the Belsize Conservation Area, as Historic England confirm, it is not of special interest, does not display any technological innovation in materials or construction and is not regarded as a rare or particularly good example of development urban accommodation.

7.4 This Statement has demonstrated that the proposed mansard represents an appropriate design response to the character of this building. Whilst its flat roof is part of the original design, this does not preclude sensitive adaptation. There are numerous examples of interwar blocks in London, with Modernist or Art Deco styling that have prominent roofscapes, including mansards. There is nothing fundamentally incongruous about the addition of a mansard roof to this particular building. The proposals have been refined and revised over many months so that they are sympathetic in terms of bulk, massing and height. The materiality responds to the red and brown brickwork of the original facades and integrates it successfully with the surrounding Edwardian context. The proposed fenestration aligns with the windows beneath and the particular rhythm and articulation of the building’s facades is reflected within the new roof addition. Similarly to the



surrounding Edwardian houses, the light toned dormer windows will provide an attractive tonal contrast with the cladding material to the new mansard. The proposals will be of a high quality, with attention to detail and the quality of the finishes ensuring that the proposed mansard will sit comfortably above the original facades of the building.

7.5 The appellant considers that the proposed mansard is contextual and sensitive to prevailing roof forms within the wider area, where mansards can be found on almost every domestic building. The architectural language of Howitt Close was clearly designed to respond to the surrounding Edwardian context and the erection of an additional floor, with its angled profile and clay tile cladding, provides a 'roof' which will terminate the building. Not only will this improve the appearance of the building from some vantage points it will demonstrably relate to its surroundings, reflecting the predominant roof form within the area. Whilst the proposed mansard would add height to the building and change its profile, an analysis of townscape views has demonstrated that this will not be harmful to the character and appearance of the Belsize Conservation Area.

7.6 As outlined at paragraph 5.12 of their delegated report the Council have erroneously interpreted the s.72 statutory duty within the Planning (Listed Buildings and Conservation Areas) Act 1990. The South Lakeland case established that a conservation area could be preserved as a result of change which did not harm character and appearance. Council officers have explicitly stated, in error, that the proposals would not preserve the character and appearance of the conservation area because the proposed changes would be perceptible. This error underpins the Council's flawed analysis that their assessment must consider only whether proposals would enhance the conservation area. This reliance upon the need to enhance, rather than simply preserve, is reiterated at paragraphs 5.13 and 5.14 of their delegated report. It is thus suggested that Council officers have failed to adequately consider the proposals correctly in line with the s.72 statutory duty.

7.7 The proposals are considered to preserve and enhance the character and appearance of the Belsize Conservation Area. They fully comply with the statutory requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990, the adopted London Borough of Camden Local Plan 2017, the London Plan 2021 and the provisions of the National Planning Policy Framework 2021.



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Heritage Appeal Statement of Case
Howitt Close, Howitt Road, London NW3 4LX

May 2023

Appendix A Historic England's 'Reject at Initial Assessment Report' dated 23 March 2023

Application Name: Howitt Close, Howitt Road, London NW3 4LX

Number: 1478490

Type: New

Heritage Category: Listing

Address:

Howitt Close, Howitt Road, London, NW3 4LX

County	District	District Type	Parish
Greater London Authority	Camden	London Borough	Non Civil Parish

Recommendation: Reject

Assessment

BACKGROUND/CONTEXT

Historic England has been asked to consider Howitt Close, Howitt Road, London Borough of Camden for listing. A planning application for a roof extension to create seven self-contained flats is being considered by the local authority (2022/3635/P). An earlier application in 2021 (2021/3839/P) was refused in August 2022.

Howitt Close is included in the Belsize Park Conservation Area as a building which makes a positive contribution to its special character and appearance. It is not locally listed.

HISTORY AND DETAILS

Howitt Close was built in 1932-1934 for the Glenloch Investment Company to designs by the architectural practice of Henry F Webb and Ash and built by Rowley Brothers of Tottenham. An article in The Builder in December 1933, with a plan of the ground and lower-ground floors, described the block of flats as a mix of bedsitting room flats with a bed alcove and two-bedroom flats. All flats were fitted with electric or gas cookers, refrigerators, modern baths with a shower attachment and wirelesses. A restaurant was included on the lower ground floor and there were 46 flats in total.

Designed as affordable, compact and modern accommodation for a middle-class clientele, Howitt Close was one of a large number of commercial inter-war flats constructed in London, and particularly in its suburbs, increasing in number through the 1930s. The inclusion of bedsits, referred to at the

time as 'minimum flats', in some of these developments was a new feature relating to demographic, economic and social changes after the First World War. They were especially characteristic of Moderne blocks such as Lawn Road (Isokon), Belsize Park and Highpoint, Highgate, with their emphasis on a rational approach to design influenced by continental designs.

Henry Frederick Webb (1879-1953) was a London architect who opened his first practice in 1920. From 1930 to 1934 he was in partnership with Arthur Stanley Ash (1885-1966). The practice designed several blocks of flats in north-west London including: Hillside Court, Finchley Road; West Heath Court, Golders Green and Brentwood Lodge, Hendon. Webb later designed Elm Park Court, Pinner (1936) in a hacienda style (Grade II).

Howitt Close occupies a compact corner site at the junction with Glenilla Road at the southern end of Howitt Road. It has three ranges arranged in an irregular Y-plan with each of the arms of differing lengths and is of three storeys with the longer western range having an additional sub-basement. The flats are arranged either side of spine corridors, with two-room flats placed in the short rear range and at the end of the north range. The building is of red-brown brick laid in English bond with a white roughcast upper storey and a flat roof with deep projecting eaves. Fenestration is of multi-pane Crittall casement windows set in red brick surrounds. The elevations are enlivened by full-height square bays, four on the western range, two on the northern range and one on the short south-eastern range. The main entrance, approached by a flight of stone steps, is set in the 45 degree angle of the west and north ranges and has a stone porch supported on paired Egyptian style columns with a fluted frieze topped by an ornamental iron balustrade. The entrance has replacement glazed timber doors with the original transom with decorative ironwork. A large window over the entrance has decorative leaded lights. The end elevation of the western range has an entrance to the sub-basement with a stone hood with brackets.

Internally, the entrance lobby is flanked by cubicles with multi-paned glazed doors, one of which probably housed a telephone. The dog-leg main stairs (and two other secondary stairs) have Art-Deco style curved decorative iron balustrades with mahogany handrails. No photographs were provided of individual flats but it is assumed that layouts remain largely unaltered and the bedsits will retain their bed alcoves. Doors to the individual flats retain their original brass door fittings.

The flats are set back from the road with a curving driveway and low brick boundary walls.

CRITERIA AND DISCUSSION

Based on the information provided and with reference to the Principles of Selection (November 2018) and our Listing Selection Guides (December 2017), Howitt Close is not recommended for listing for the following principal reasons:

Degree of architectural interest:

* as an early-1930s apartment block, Howitt Close would be expected to show a particularly high

degree of architectural or historic interest to justify listing, as large numbers were built in the inter-war period, particularly in London. Although it exhibits a sympathetic and competent design, clearly intended to harmonise with the surrounding Edwardian housing, it is, as a result, rather old-fashioned in style despite some Art-Deco touches, and does not display any innovative design features which would provide special interest in a national context;

- * whilst the building survives largely unaltered externally (and in terms of the visible public areas, internally), this is, in itself, not sufficient reason for designation given the overall lack of architectural special interest;
- * the building does not display any technological innovation in materials or construction;
- * the architects, Henry F Webb and Ash, were proficient commercial architects specialising in apartment blocks in London, but are of regional rather than national interest;
- * the provision of bedsitting-room flats, which provide the majority of the accommodation in Howitt Close, was a feature of commercial apartment blocks in the inter-war period. However, better examples of this new trend have been designated including Highpoint and Isokon flats, albeit at the higher grades. Howitt Close cannot be regarded as a rare or particularly good example of this development in urban accommodation and therefore does not provide special interest.

Degree of historic interest:

- * the building does not have any historical associations with nationally important people or events.

CONCLUSION

Howitt Close is an attractive and well surviving development, typical of the inter-war period, which its status within the conservation area recognises. However, its moderate architectural interest means it does not meet the criteria for listing at a national level.

SOURCES

The Builder, 1 December 1933, Volume 145 - pages 861, 862, 872 ;

Camden Council, Belsize Conservation Area Statement (April 2003).