

Delegated Report		Analysis sheet		Expiry Date:	19/10/2022
		N/A / attached		Consultation Expiry Date:	
Officer			Application Number(s)		
Kate Henry			2022/3635/P		
Application Address			Drawing Numbers		
Howitt Close Howitt Road London NW3 4LX			019023-P-Si-D-003; 019023-P-R-D-004; 019023-E-NE/NW-D-005; 019023-E-SE/SW-D-006; 019024-P-Si-B-012; 019024-P-03-D-013 Rev F; 019024-P-R-D-014 Rev C; 019024-E-NE/NW-D-015 Rev D; 019024-E-SE/SW-D-016 Rev A; 019024-X-AA-D-017 Rev C; Addendum to Design and Access Statement, dated 16/08/2022 (bubble architects); Design and Access Statement, dated 05/08/2021 (bubble architects); Energy and Sustainability Statement, dated June 2021 (Environmental Services Design Limited); Heritage Technical Note, dated 21/07/2022 (Duncan Coe Heritage Consultant); Heritage Statement, dated July 2021 (Cotswold Archaeology).		
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature		
Proposal(s)					
Erection of roof extension to create 7 self-contained flats (Class C3)					
Recommendation(s):		Refuse planning permission			
Application Type:		Full Planning Permission			

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice					
Informatives:						
Consultations						
Adjoining Occupiers:	No. notified	00	No. of responses	00	No. of objections	00
			No. electronic	00		
Summary of consultation responses:	<p>Site notices were displayed on 23/09/2022 (consultation expiry date 17/10/2022) and a notice was placed in the local press on 22/09/2022 (consultation expiry dated 23/10/2022). The consultation period was later extended to 08/12/2022 to allow local residents additional time to comment.</p> <p><b>Objections</b> were received from at least 84 addresses (29 within Howitt Close, plus 1 letter on behalf of unspecified leaseholders of Howitt Close; 13 on Howitt Road; 10 on Belsize Park Gardens, including 3 from Manor Mansions; 4 on Glenloch Road; 7 on Glenmore Road; 2 on Belsize Grove; 2 on Belsize Avenue; 3 from nearby roads, 1 from an address elsewhere in London and 12 unspecified addresses), summarised as follows:</p> <p><u>Heritage and design</u></p> <ul style="list-style-type: none"><li>• Revised proposal does not address previous reasons for refusal / application is only marginally different to previously refused application.</li><li>• Existing building has been nominated for the Council's Local List and no decision on this planning application should be made until that decision is made.</li><li>• Proposal neither preserves or enhances the character and appearance of the Belsize Conservation Area.</li><li>• Design &amp; Access Statement is misleading / inaccurate and seeks to downplay the significance of the host building.</li><li>• Existing 1930's Art Deco building, which is well preserved and of considerable architectural merit and makes a positive contribution to the conservation area, should not be altered.</li><li>• Existing building is a great example of interwar architecture by a notable architectural firm of the period, designed to respect its Edwardian surroundings.</li><li>• Existing building is already 'finished' / destroying the composition of the original building.</li><li>• Detrimental impact on street scene / impact on Howitt Road skyline / loss of views to street behind.</li><li>• Change to roof design does not represent an improvement / extension would still be very prominent.</li><li>• Contribution to housing is insufficient to outweigh the harm to the character and appearance of the conservation area.</li><li>• Planning application documents are insufficient to assess the application.</li><li>• Objections from Twentieth Century Society, Belsize Conservation Area Advisory Committee, Heath &amp; Hampstead Society, Belsize Society.</li></ul> <p><u>Impact of additional housing</u></p> <ul style="list-style-type: none"><li>• Impact on parking.</li><li>• Local roads already congested.</li><li>• Impact on school places availability.</li><li>• Impact on refuse collection.</li><li>• No provision for affordable housing (high value market housing is not</li></ul>					

what's needed in the area)

Trees and landscaping / biodiversity

- Impact on trees during construction period.
- Lawn to front of building will be ruined during construction period.
- Impact on local wildlife.

Impact on neighbours

- Impact during the construction period (noise, traffic, disruption to people working at home in existing flats, in the vicinity etc.)
- Cumulative impact of all the ongoing building works in the local area (including to pedestrians).
- Loss of light to neighbouring properties (notably Straffan Lodge, 65 Glenmore Road, 62 Howitt Road).
- Proper daylight / sunlight analysis is required.
- Existing building already intrudes into gardens of properties on Belsize Park Gardens and proposal would make the impact worse.

Sustainability

- Small solar panels are insufficient to be useful.

Other

- Application seems to be pre-determined (discussions with officers before resubmission).
- Would set a precedent for similar development in the wider area.
- Causing lots of stress to local residents for very little benefit / developer should take note of previous refusal and strong local feeling against the development.
- Freeholder is notoriously dishonest and has poor record for maintaining the application building adequately.
- Failure of freeholder to engage with leaseholders.
- Leaseholders are seeking to acquire freehold – this is just an exercise in increasing the value first.
- Existing building cannot take an additional floor (strength of roof, old pipework, relocation of existing services, capacity of heating system, water storage etc.)
- Existing building doesn't have lifts, not a good idea to add another storey (will lead to future applications to add lifts to the building).
- Party Wall Act and Right to Light issues.
- Subsidence.
- No consideration of viability or deliverability.

<p><b>Belsize CAAC</b></p>	<p><b>Objection</b> from Belsize CAAC, summarised as follows:</p> <ul style="list-style-type: none"> <li>• The application does not address any of the concerns of the previous application, which was refused.</li> <li>• The extension is out of keeping with the date, design and style of the host building.</li> <li>• The existing flat roof is a typical and characteristic detail.</li> <li>• Proposed extension has an obtrusive and dominating appearance / top heavy and bulky.</li> <li>• Impact on outlook, overshadowing, overlooking of neighbouring buildings (including Belsize Park Gardens).</li> <li>• Loss of mature trees due to construction.</li> <li>• Increased density – impact on amenities.</li> <li>• Only provides 7 small flats.</li> <li>• Sets a dangerous precedent.</li> </ul>
<p><b>Belsize Society</b></p>	<p><b>Objection</b> from Belsize Society, summarised as follows:</p> <ul style="list-style-type: none"> <li>• The proposal would cause very significant harm to an important building within the Belsize Conservation Area. In the Belsize Conservation Area Statement there are a number of highly relevant statements:</li> <li>• Building is identified as positive contributor – presumption in favour of retention.</li> <li>• Belsize Conservation Area retains much of its architectural integrity - the majority of the area retains the essence of the character and appearance that would have prevailed in the 1930's.</li> <li>• Conservation Area Statement says: 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: <ul style="list-style-type: none"> <li>○ It would be detrimental to the form and character of the existing building;</li> <li>○ The property forms part of a group or terrace which remains largely, but not completely unimpaired;</li> <li>○ The property forms part of a symmetrical composition, the balance of which would be upset; and</li> <li>○ The roof is prominent, particularly in long views.</li> </ul> </li> <li>• The proposals would be detrimental to the form and character of the existing building, the property forms part of a group or terrace (Howitt Road) which remains largely, but not completely unimpaired, the property forms part of a symmetrical composition, the balance of which would be upset and the roof is prominent, particularly in long views. On this basis Camden should refuse the application.</li> <li>• The Twentieth Century Society has objected to the proposals set out in this application and in addition has, along with the Belsize Conservation Area Advisory Committee and the Heath and Hampstead Society, strongly supported the application made by Belsize Society for Howitt Close to be Locally Listed. It would clearly be quite wrong to determine this application before the application for Local Listing has been dealt with.</li> <li>• Howitt Close meets all of the four criteria set out in Camden's requirements for Local Listing (architectural significance; historical significance; townscape significance; social significance)</li> <li>• Application is too similar to previously refused application / previous reasons for refusal have not been overcome.</li> <li>• Howitt Close was very carefully designed in 1932 to suit its specific</li> </ul>

location and, internally and externally, it remains fundamentally undamaged and unaltered by changes since construction. It has maintained its architectural integrity over the best part of a century and is unspoilt by major additions or changes. After surviving intact the second world war, unlike some Howitt Road properties, and escaping infelicitous developments in the post WWII era, it would be deeply ironic if the building were to be desecrated in the 21st century whilst defined as a building making a positive contribution to the special character and appearance of the Belsize Conservation Area, and apparently subject to the protections of a Conservation Area.

- This L-shaped building was clearly designed to make optimal use of the space available, but without dominating its prominent position at the junction of Howitt Road and Glenilla Road, with Belsize Park Gardens a stone's throw away. Aesthetically it was designed to blend with the earlier Edwardian terraced housing in the neighbouring streets that predated it, whilst proclaiming its era of construction through its overall form and Art Deco flourishes. The proposal to add a fourth level and mansard roof would destroy the proportions of the building and make Howitt Close, at present perfectly adjusted to its vicinity within streets of terraced Edwardian houses, an over-prominent and jarring presence.
- Heritage Statement is inadequately researched (e.g. route to becoming an architect in 1930s; attempts to dismiss gifted architects – Webb & Ash; lacks historical accuracy etc.)
- The Planning Statement is misleading and the Heritage Statement downplays the architectural uniqueness of the building and makes no mention of the excellent state of authenticity and preservation of the building.
- Belsize Society disagrees that the impact on the building would be neutral, instead it would be highly intrusive and damaging.
- The closest visible mansion block to Howitt Close is Sussex House, a short distance away on Glenilla Road, which is singled out in the Conservation Area Statement as a negative feature: "an oppressively large block" and "an overbearing flat block significantly larger than the other buildings in the street". The proposed works would make Howitt Close into an oppressively large block, significantly larger than the other buildings in the street.
- Belsize Society notes that the applicant has refined its proposal on many occasions to try to make it less obtrusive. It is clear from the illustrations in the original and the new application that it is impossible to make a proposal of this kind acceptable in design terms, an attic storey will ruin the subtle gentle appearance of the existing building design.
- Building is contemporaneous with the nearby Isokon building (grade I listed) and had similar intentions (communal living for the middle classes).
- Should not desecrate the building for the sake of a few additional flats.
- Additional research carried out by a number of objectors has shown that the architects who designed Howitt Close were also responsible for many very important projects in the inter-war and post-war years. Howitt Close represents one of the few unaltered buildings.
- New research has established that Howitt Close is of much greater importance than had been thought at the time of the refusal of the previous application (reference 2021/3839/P) and therefore greater weight must be given to its conservation in considering the current application.

**Twentieth Century  
Society**

**Objection** from Twentieth Century Society, summarised as follows:

- Position remains the same as previously.
- The switch from a mansard roof to a flat roof form does not mitigate the original harm identified in the original proposal, the revised addition still harms the building's architectural interest and uniqueness.
- The Society continues to object to the application due to the harm caused to a non-designated heritage asset and to the character of the conservation area.

The previous objection from Twentieth Century Society (in relation to application reference 2021/3839/P) is summarised as follows:

Howitt Close is an interwar T-shaped block of flats, located on a corner site where Howitt Road meets Glenilla Road in Belsize Park. Glenloch, Glenmore, Glenilla and Howitt roads were created in the early 20th-century on the site of a large 1860s house called The Woodlands. The Belsize Conservation Area Statement (2003) describes the 'Glenloch Area' as a "*distinctive area of Edwardian terraced housing developed by the Glenloch Insurance Company close to Belsize Park Underground Station [opened 1907] and Haverstock Hill*" (p.25).

British History Online (BNO) expands on this, outlining its development in the interwar period: "*Glenloch Investment Co. was responsible for the Woodlands estate, where houses were still being built in Glenilla Road in 1923-4 and blocks of flats were put up, Glenloch Court in 1927 and Banff House and Howitt Court in 1932.*" This is almost certainly Howitt Close which was built on the site of the Woodlands estate between the Ordnance Survey (OS) map was published in 1920 and revised in 1935. A 1932 archive document relating to the building includes the name of the architect's practice, Henry F. Webb & Ash. Howitt Close is a 3-storey, brown brick building with distinctive stepped bays, red brick dressings, rendered upper storey and flat roof with projecting eaves. Its entrance bay features a porch with paired columns and decorative iron balcony, and period lettering reads 'Howitt Close'.

The 1920s and 30s saw the construction of more blocks of flats nearby, including Gilling Court (1932) and Holmfield Court (1933) on Belsize Grove built by the Bell Properties Trust, and Hillfield Estates' Hillfield Court and Mansions (1934) fronting Haverstock Hill and Tudor Close (1935) behind, all of which are included within the boundaries of the Belsize Conservation Area.

Howitt Close is a good example of an interwar block of flats and is clearly of architectural merit. The Belsize Conservation Area Statement (2003) identifies Howitt Close as a building which makes a positive contribution to the character and appearance of the conservation area (p.30).

On 'Roof Extensions', the Belsize Conservation Area Statement states that "*Roof extensions and alterations, which change the shape and form of the roof, can have a harmful impact on the Conservation Area*". Such extensions "*are unlikely to be acceptable where: It would be detrimental to the form and character of the existing building*" (p.41). We agree with the Belsize Conservation Area Advisory Committee (BCAAC) who have objected to the proposed extension on the grounds that it "*would be out of keeping with the date, design and style of the building*" and would be 'obtrusive' and dominant.

The applicant claims that the flat roof is "*uncommon within the Conservation Area sub-area and does not contribute positively to the character and appearance of the area*" (Heritage Statement, p.3). We believe the building's

	<p>flat roof is a key part of its interwar character and appearance, and distinguishes it from neighbouring buildings in a way that contributes to the variety and interest of the sub-area. The proposed mansard roof will harm the building's architectural interest and uniqueness.</p> <p>Object due to the harm caused to a non-designated heritage asset and to the character of the conservation area.</p>
Heath & Hampstead Society	<p><b>Objection</b> from Heath &amp; Hampstead Society, summarised as follows:</p> <ul style="list-style-type: none"> <li>• This excellent and well preserved example of a 1930's group of flats was carefully designed to visually relate to the existing terrace houses. Any attempt to build another storey on top of the existing building will ruin the carefully composed facades - and this attempt is particularly crude and top-heavy.</li> <li>• We would support most enthusiastically the application for these flats to be Locally Listed.</li> <li>• It is noticeable that the elevations included in the application do not include the adjacent houses - if they did it would reveal how well the design of the flats relates to the scale and character of the existing houses - and how badly the proposal does.</li> </ul>
Ward councillors for Belsize Ward	<p><b>Objection</b> from Cllrs Tom Simon, Judy Dixey and Matthew Kirk, summarised as follows:</p> <ul style="list-style-type: none"> <li>• Would not preserve or enhance the Belsize Conservation Area but would have a negative impact.</li> <li>• Revised proposal does not address previous reasons for refusal / application is only marginally different to previously refused application.</li> <li>• Previous application was refused based on detailed design, bulk, massing, height, materials, undue prominence. The changes to the design do not overcome the previous reason for refusal.</li> <li>• Over 100 objections from local residents and the Belsize Society, the Heath and Hampstead Society, the Twentieth Century Society and the Belsize Conservation Area Advisory Committee. Many of them possess expertise in planning and architecture, as well as detailed knowledge of the local area, and the overwhelming consensus is that the changes in design do not make this application acceptable.</li> <li>• Level of objection is unusual.</li> <li>• The freeholder's decision not to follow the Council's advice to consult with leaseholders and other residents in the block, as well as other residents in the vicinity of Howitt Close, betrays a lack of care or interest in the local community.</li> <li>• If this application is approved, any efforts the developer might then make to engage with the local community would be the bare minimum required by law and would be treated by the developer as a tick box exercise.</li> <li>• The draft CMP shows that this project would cause extreme disruption and disturbance for residents of Howitt Close and significant levels of problems for other residents nearby. Even with a freeholder that had demonstrated care and consideration in its approach to date, we would have concerns on this point. With the attitude that has been displayed we can see a very rocky road ahead, if this application is approved.</li> </ul>

## Site Description

Howitt Close is a 3 storey, L-shaped, purpose-built block of flats dating from the 1930's at the southern end of Howitt Road, adjacent to the junction with Glenilla Road.

It is constructed with brown bricks with a white rendered third (top) floor and red brick detailing around the windows. It features stepped bays and a flat roof with overhanging eaves. The main entrance, at the inner corner of the L-shape, features paired columns and a decorative iron balcony above, with the name of the building above at third floor level.

The application site is within the Belsize Conservation Area and the building is identified in the Belsize Conservation Area Statement (2003) as making a positive contribution to the character and appearance of the area. The building is therefore considered to be a non-designated heritage asset (NDHA).

A listing application has been rejected by Historic England (a second attempt at listing is still awaiting determination). The decision notes: *"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."*

The surrounding area is residential in character, predominantly featuring Edwardian semi-detached and terraced housing on Howitt Road, Glenmore Road and Glenilla Road; and larger paired Victorian villas and purpose-built flats (e.g. Manor Mansions) on Belsize Park Gardens.

Howitt Road slopes down from Haverstock Hill. Howitt Close is at the bottom of the slope and appears a similar height to the neighbouring two storey buildings when viewed from above.

## Relevant History

**2021/3839/P:** Erection of mansard roof extension to create 7 self-contained flats (Class C3). **Refused 03/08/2022. Appeal dismissed 21/09/2023.**

LB Camden reasons for refusal:

- 1. 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.*
- 2. In the absence of detailed drawings of the proposed solar PV panels, it has not been adequately demonstrated that the proposed development would minimise the effects of climate change or meet the highest feasible environmental standards, contrary to policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.*
- 3. The proposed development, in the absence of a legal agreement to secure a contribution to affordable housing, would fail to maximise the contribution of the site to the supply of affordable housing in the borough, contrary to policies H4 (Maximising the supply of affordable housing) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.*
- 4. The proposed development, in the absence of a legal agreement securing a Construction Management Plan, implementation support fee and Construction Impact Bond, would be likely to give rise to conflicts with other road users and be detrimental to the amenity of the area generally, contrary to policies A1 (Managing the impact of development), T4 (Sustainable movement of goods and materials) and DM1 (Delivery and monitoring) of the*



5. *The proposed development, in the absence of a legal agreement to secure the new dwellings as "car-free", would be likely to contribute unacceptably to parking stress and congestion in the surrounding area, contrary to policies T2 (Parking and car-free development) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.*

**TP948/12543:** The construction of an additional floor at third floor level containing fourteen self-contained flats. **Refused 29/06/1961.**

Reasons for refusal:

- 1. The proposal would not accord with the provisions of the Administrative County of London Development Plan as regards density or persons per acre, the density as proposed being considerably in excess of that provided for in this area.*
- 2. The proposal would not comply with the Council's daylighting standards next the south-eastern and south-western boundaries of the site and would have the effect of preventing the access of adequate light across these boundaries to the detriment of adjoining land.*
- 3. The proposal would result in overdevelopment of the site.*
- 4. Owing to the lack of car parking facilities to the existing building, the proposed addition would further aggravate the parking position.*

**TP948/70566:** The erection of a steel flue pipe at the rear of the premises known as Howitt Close, Howitt Road, Hampstead, and the retention of the structure for the period allowed under the London Building Act, 1930. **Granted 07/07/1937.**

## Relevant policies

### National Planning Policy Framework (2023)

### London Plan (2021)

### Camden Local Plan (2017)

G1 Delivery and location of growth

H1 Maximising housing supply

H4 Maximising the supply of affordable housing

H6 Housing choice and mix

H7 Large and small homes

C5 Safety and security

C6 Access for all

A1 Managing the impact of development

A2 Open space

A3 Biodiversity

A4 Noise and vibration

D1 Design

D2 Heritage

CC1 Climate change mitigation

CC2 Adapting to climate change

CC3 Water and flooding

CC4 Air quality

CC5 Waste

T1 Prioritising walking, cycling and public transport

T2 Parking and car-free development

T3 Transport infrastructure

T4 Sustainable movement of goods and materials

DM1 Delivery and monitoring

## Camden Planning Guidance

Access for All (2019)

Air Quality (2021)

Amenity (2021)

Biodiversity (2018)

Design (2021)

Developer Contributions (2019)

Energy efficiency and adaptation (2021)

Housing (2021)

Public open space (2021)

Transport (2021)

Trees (2019)

Water and flooding (2019)

## Belsize Conservation Area Statement (2003)

### Assessment

#### 1. The proposal

1.1. Planning permission is sought for a roof extension to create 7 flats.

1.2. The proposed roof extension would measure 3.3 metres tall and would be constructed with brown facing bricks to match the existing at the lower levels of the building, with a zinc flat roof above. The new extension would sit above a white rendered band, above the existing overhanging eaves. The windows within the extension would be silver coloured steel and double glazed.

1.3. The proposed dwelling mix is as follows:

Flat 1	2-bed-3-person
Flat 2	2-bed-4-person
Flat 3	2-bed-3-person
Flat 4	1-bed-2-person
Flat 5	2-bed-4-person
Flat 6	2-bed-3-person
Flat 7	2-bed-4-person

1.4. A new bin store and bike store (16 spaces) would be provided to the west of the building, accessed from Glenilla Road.

#### 2. Planning considerations

2.1. The key considerations material to the determination of this application are as follows:

- Heritage and design (including listing applications and recent appeal decision)
- Housing (including affordable housing, dwelling mix, quality of living accommodation)
- Trees and landscaping
- Biodiversity
- Impact on neighbours

- Transport considerations
- Energy and sustainability

### 3. Heritage and design

#### Application for statutory listing

- 3.1. In January 2023, the Belsize Society, supported by the Heath & Hampstead Society, submitted an application to Historic England to add the application building to the List of Buildings of Special Architectural or Historic Interest.
- 3.2. Historic England considered the application for statutory listing and completed an assessment of the building based on the material provided. The Secretary of State decided on 31/03/2023 **not** to add Howitt Close to the List. The [Notification of Designation Decision report](#) notes: “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” (page 2). The report concludes: “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.” (Page 3)
- 3.3. A second application has been submitted to Historic England, based on new evidence that has been found. Despite the Planning Inspectorate giving the Department of Culture Media and Sport a deadline for making a decision, no final decision has been issued yet. At the time of making this decision, the application building is not statutorily listed.

#### Application for Local Listing

- 3.4. In October 2022, the Belsize Society made an application to the Council to Locally List the application building. The Local List generally identifies parts of the historic environment that are not already designated in another way (e.g. buildings not within conservation areas and which do not meet the high bar for national statutory listing as a designated asset). The fact the building is identified in the Belsize Conservation Area Statement as making a positive contribution to the character and appearance of the conservation area means the building is already considered by the council as a “*non-designated heritage asset*” (NDHA) for the purpose of decision making.
- 3.5. Officers considered the application to Locally List Howitt Close; however, given that the building is a non-designated heritage asset, Local Listing would offer no further protection to the building and therefore it is not considered necessary to add the building to the Council’s Local List.

#### Legislation and policy

- 3.6. The application site is within the Belsize Conservation Area, wherein the Council has a statutory duty, under section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended), to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.
- 3.7. Belsize Conservation Area is a designated heritage asset. Paragraph 199 of the National Planning Policy Framework (NPPF) guides that: “*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 then guides that: "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."

- 3.8. Howitt Close is identified as a non-designated heritage asset. Paragraph 203 of the NPPF states: "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."
- 3.9. Policy D1 of the Camden Local Plan seeks to secure high quality design in development which respects local context and character; preserves or enhances the historic environment and heritage assets in accordance with Policy D2 (Heritage); and comprises details and materials that are of high quality and complement the local character. Policy D2 seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets, including conservation areas. The policy notes that, 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.

#### Recent appeal decision (application reference 2021/3839/P)

- 3.10. Application reference 2021/3839/P sought permission for the erection of a mansard roof extension to create 7 self-contained flats. The application was refused by the Council on 03/08/2022 and subsequently dismissed at appeal on 21/09/2023.
- 3.11. The Council's first reason for refusal related to the detailed design, bulk, massing, height, materials and undue prominence of the roof extension and the fact it would compromise the form, character and appearance of the host building and would thus harm the character and appearance of the streetscene and the Belsize Conservation Area. The second reason for refusal related to the solar PV panels and reasons 3, 4 and 5 related to the lack of a legal agreement to secure: (3) a contribution to affordable housing; (4) a Construction Management Plan, implementation support fee and Construction Impact Bond; and (5) "car-free" dwellings. (Please refer to Planning History section above for the reasons for refusal in full.)
- 3.12. This second application was submitted to the Council on 24/08/2022, before the abovementioned appeal was lodged with the Planning Inspectorate on 02/02/2023. Prior to the appeal being lodged, officers had been minded to recommend approval of the second application and it was due to be decided at Planning Committee; however, when the appeal was lodged the decision was taken to await the Planning Inspector's final decision as it would be a material consideration in the determination of this application. As noted, the appeal was dismissed.
- 3.13. In the appeal decision, the Inspector discusses in detail the way in which Howitt Close relates successfully to its surroundings and what makes it significant as a non-designated heritage asset in the Belsize Conservation Area. The Inspector states: "*Despite having a full third storey in comparison with mansard storeys of neighbouring terraces, Howitt Close is lower than adjacent Edwardian terraces on Howitt Road and Glenilla Road, which are mainly two storey with mansard storeys above. The brick/render storey composition of Howitt Close, along with its lower ground position due to topography, ensures that it does not appear overly bulky or prominent in the street scene... Through this contextual design, the development fits comfortably into its roughly triangular plot and respects its built surroundings, including the Conservation Area.*" (emphasis added) (para. 8). He goes on to state: "A further strong design feature is the entrance with its paired striped Egyptian-style columns, a decorative iron balcony

above and the name of the building above at third floor level. In combination with the use of materials and the pronounced roof eaves, such qualities give the building its own identity and attraction in the street scene.” (emphasis added) (para. 9).

- 3.14. The Inspector refers to Historic England’s listing decision (see paras. 3.1 to 3.3 above), highlighting the fact that their comments are made against the background of whether the building would provide special interest in a national context. Discussing its interest at the local level, the Inspector notes: *“Despite its contextual design response to its surroundings, its full three storey and flat roof form, together with its architectural features, still identify Howitt Close as being distinctive within the street scene, albeit in a subtle way. In particular, the juxtaposition between the flat roof, with its projecting moulded eaves, and rendered/brick storeys below, with contrasting red brick dressing, is visually appealing and different to their surroundings.”* (emphasis added) (para. 12). The Inspector also refers to the building’s historical value, stating: *“...although one of many built at the time, Howitt Close still has historical value reflecting the substantial growth of London in the interwar years, that was a response to significant change, and its use for émigrés and refugees. By reason of its intact state, its design is reflective of architecture at the time in the 1930s. For all these reasons, whilst the building’s significance would not merit listed building status, its contextual and individualistic design and historical qualities are of importance and value, and result in a moderate level of significance for the NDHA.”* (emphasis added) (para. 13).
- 3.15. The Inspector later concludes: *“... Howitt Close is a well-preserved example of 1930s architecture, contributing to variety within the Conservation Area, and thus, to its significance and special interest. It makes a positive contribution to the character and appearance of it.”* (emphasis added) (para. 17).
- 3.16. The Inspector did not consider that the proposed mansard roof would be appropriate to the host building. He specifically refers to the fact the mansard roof would give the host building a “top-heavy” appearance and the dormers would appear overly large compared to the windows below. Whilst the Inspector was commenting specifically on the mansard roof proposal, his comments nevertheless suggest that any upwards extension of the building would be detrimental to its interest and significance. For example, he states: *“The significance of the building is derived from how it has designed to fit into its surroundings in a discrete way but at the same time having unique individualistic design qualities. By reason of its dominance, the roof extension would run counter to these contextual and individual architectural qualities of the building. The introduction of a new striking facing material, clay tiles, would appear unsympathetic in drawing attention to the roof extension and its dominant nature, and detracting from the simple use of render and brick on different storeys. By reason of bulk, massing and design, the development would visually overwhelm features that are an integral part of the building’s design and significance, namely the roof, with its deep and moulded eaves, and the storeys below with their bays and fenestration.”* (emphasis added) (para. 19). He also states: *“There are examples of 1930s flats with mansard roofs but the acceptability of a building extension will depend upon the architectural and historic characteristics of the host building. In this case, the building has been designed in a particular way which the proposal would fail to respect. Within this Conservation Area, its flat roof and eaves help to distinguish it from other buildings in a way that contributes to its variety, significance and special interest. The bulk and massing of the roof extension would significantly affect this quality through copying this predominant roof feature of the area and therefore, its individuality would be significantly diminished.”* (emphasis added) (para. 20).
- 3.17. It is recognised that the design of the proposed roof extension has been amended to try and address the Council’s previous concerns about the impact on the host building. The proposed roof extension now features vertical external walls and a flat roof rather than being a mansard design; it would feature bricks to match the existing bricks at the lower levels rather than introducing another facing material; and the fenestration has also been amended to better reflect the fenestration on lower levels. However, adding a further storey to the building would still increase its overall height thereby adding to its visual prominence in the streetscene, and a

roof extension would detract from features that have been specifically identified as contributing to the building's significance, namely the pronounced roof eaves and flat roof above the rendered third storey and lower brick storeys. Any upwards extension of the host building would detract from its original design and affect the building's individuality and intact state, thereby harming its significance as a non-designated heritage asset in the Belsize Conservation Area. In light of the Inspector's comments, the principle of a roof extension is no longer considered to be acceptable.

#### Planning balance

- 3.18. In light of the Inspector's comments, officers consider that the proposed development would harm the significance of Howitt Close (non-designated heritage asset) and would harm the character and appearance of the Belsize Conservation Area (designated heritage asset). The degree of harm to the conservation area is considered to be 'less than substantial', in terms of the NPPF.
- 3.19. In accordance with paragraph 202 of the NPPF, the harm to the Belsize Conservation Area should be weighed against the public benefits of the proposed development. As noted by the Planning Inspector, the proposal would provide additional permanent, self-contained housing in the borough and a financial contribution to affordable housing; new residents financial spend would benefit the viability of local services and the economy; and, environmentally, the proposal would make more effective use of land and would provide a range of passive and active energy efficient measures, including solar panels. However, the Council does not consider that the public benefits of the scheme would outweigh the less than substantial harm identified.
- 3.20. In accordance with paragraph 203 of the NPPF, the effect of the application on the significance of Howitt Close (as a non-designated heritage asset) should be taken in to account and a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset. The Council does not consider that the harm to the host building would be outweighed by the benefits of the proposal.
- 3.21. The application is recommended for refusal.

## **4. Housing**

### Housing as priority land use

- 4.1. Policy G1 of the Local Plan promotes the most efficient use of land in the borough and housing is regarded as the priority land use of the Local Plan.
- 4.2. The Housing Delivery Test (HDT) is an annual measurement of housing delivery in the area of relevant plan-making authorities introduced by the government. It measures whether planned requirements (or, in some cases, local housing need) have been met over the last 3 years. The government's most recently published figure is for 2021, when the measurement for Camden was 76% - which means that Camden has to produce an action plan and apply a 20% buffer to its 5-year housing land supply. The housing land supply set out in the Authority Monitoring Report concludes the amount of deliverable housing land in the borough falls substantially short of what is needed for a 5-year supply. This means the presumption in favour of granting permission for development under paragraph 11(d) of the NPPF is engaged.
- 4.3. On the basis of the above, the provision of housing should be given significant weight. The NPPF indicates that applications should be granted unless their adverse impacts would significantly and demonstrably outweigh their benefits when assessed against NPPF policies as a whole, which include those for the protection of heritage assets. As outlined in the previous section of this report, the proposal would have an adverse impact on the character and appearance of the conservation area (designated heritage asset) and the host building (non-designated heritage asset). The harm is not outweighed by the benefits of the proposal,

even when the provision of housing is given significant weight.

#### Affordable housing contribution

- 4.4. Policy H4 expects a contribution to affordable housing from all developments that provide 1 or more additional homes and involve a total addition to residential floorspace of 100 sqm GIA or more.
- 4.5. The proposed development involves the creation of 7 additional homes and a total addition to residential floorspace of 570 sqm.
- 4.6. Targets are based on an assessment of development capacity whereby 100 sqm GIA of housing floorspace is generally considered to create capacity for one home and a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% for each home added to capacity. In this case the target is 12% (based on the floorspace being rounded up to the nearest 100 sqm i.e. 600 sqm).
- 4.7. Where development has the capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing. A rate of £5000 per sqm GIA is applied. On this basis the contribution would be as follows:

$$[\text{Additional residential floorspace (GIA)} \times 12\%] \times £5000$$

$$[570 \times 12\% = 68.4] \times £5000 = \underline{\underline{£342,000}}$$

- 4.8. If the application was otherwise considered to be acceptable, the financial contribution could be secured by section 106 legal agreement. The lack of an agreement to secure the affordable housing contribution forms a reason for refusal.

#### Dwelling mix

- 4.9. Policy H7 of the Local Plan aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. The policy requires that all housing development, including conversion of existing homes and non-residential properties, contributes to meeting the priorities set out in the Dwelling Size Priorities Table (DSPT); and includes a mix of large (3 or more bedrooms) and small homes. The policy then goes on to note that the Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development.
- 4.10. The proposed development provides 6x 2-bed units and 1x 1-bed unit and therefore fails to provide a mix of large and small homes. However, this is as a result of changes made to the proposal to improve the visual impact (the previously refused proposal included 1x 3-bed unit) and the fact that the proposal provides mostly 2-bed units is welcomed as 2-bed market units have high priority in the DSPT. On balance, the proposal is considered to be acceptable in this respect.
- 4.11. A comment was made previously that the proposal does not provide the most efficient layout for providing new housing (i.e. more could be provided with an altered layout). However, it is worth noting that flats on the lower floors fail to meet modern day space standards and so there is no option to copy the floorplan from lower floors.

#### Living standards for future occupiers

- 4.12. Policy D1 of the Local Plan seeks to secure high quality design in development, including a high standard of living accommodation [clause (n)]. The supporting text to the policy notes that all residential developments should be designed and built to create high

quality homes. The Council will seek to ensure that residential development (both new build and change of use) is self-contained with its own secure private entrance; has good ceiling heights and room sizes; is dual aspect except in exceptional circumstances; has good natural light and ventilation; has good insulation from noise and vibration; has a permanent partition between eating and sleeping areas (studio flats are acceptable where they provide adequate space to separate activities); incorporates adequate storage space; incorporates outdoor amenity space including balconies or terraces; and is accessible and adaptable for a range of occupiers. The supporting text also notes that new dwellings and conversions to residential use will be expected to meet the Government's nationally described space standard.

4.13. The proposal would provide the following:

<b>Unit</b>	<b>Dwelling type</b>	<b>Floorspace (sqm)</b>	<b>Required standard (sqm)</b>
<b>Flat 1</b>	2-bed-3-person	66	61
<b>Flat 2</b>	2-bed-4-person	72	70
<b>Flat 3</b>	2-bed-3-person	64	61
<b>Flat 4</b>	1-bed-2-person	51	50
<b>Flat 5</b>	2-bed-4-person	70	70
<b>Flat 6</b>	2-bed-3-person	62	61
<b>Flat 7</b>	2-bed-4-person	72	70

4.14. The Government's nationally described space standards are set out in the final column of the table above. All of the units would meet or exceed the required space standards. All of the proposed new units would be self-contained with their own secure private entrances. The new units would be accessed via the main entrance to the host building and via the existing communal staircases which would be extended upwards to the new fourth floor. The new units would have good ceiling heights (between 2.2 and 2.5 metres) and room sizes and all would have good layouts, including a permanent partition between eating and sleeping areas and the incorporation of adequate storage space.

4.15. Flats 3 and 4 would be single aspect. Flat 3 would face to the front (north) of the building and Flat 4 would face to the rear (south). On the basis that it is difficult to avoid single aspect units due to the floorplan (which is being extended upwards) and taking into consideration the fact there are numerous other single aspect units within the same building, this is considered to be acceptable in this case. Flat 3, which is a 2-bed unit, would have pleasant views to the front of the building and along Howitt Road and Flat 4, the 1-bed unit, would have views towards to the rear of properties on Belsize Park Gardens. Whilst the views from Flat 4 may not be as interesting as views along the road, this unit benefits from being south-facing and it should therefore receive good natural light and sunlight.

4.16. The other new units would mostly have good natural light and ventilation too. Flat 3, the north-facing, single-aspect flat, may suffer from a lack of natural sunlight; however, its elevated position should at least prevent overshadowing from neighbouring buildings. Both Flats 3 and 4 (the 2 single-aspect units) benefit from a number of windows serving different rooms, to aid with natural ventilation throughout the units.

4.17. The proposed layout is considered to be suitable to prevent noise transfer between units. If the application was otherwise considered to be acceptable, suitable planning



conditions could require the submission of details of adequate noise insulation for the new dwellings, prior to the commencement of development.

4.18. None of the units would have access to private outdoor amenity space; however, this can also be said of the existing units in the host building and the application site is within walking distance of Hampstead Heath and Primrose Hill. There is also a small amount of communal open space surrounding the host building. Each new flat would benefit from planting areas outside the windows which they would be able to personalise, which is a benefit.

4.19. Policy H6 requires 90% of new-build homes to comply with M4(2) (accessible and adaptable dwellings) and a requirement for 10% of new build homes to comply with M4(3) (wheelchair user dwellings). However, there is no existing lift in the building and it would not be viable to provide one as it would involve invasive works of reconfiguration to all floors below. Step-free access cannot therefore be achieved for the new homes. The supporting text to policy H6 (paragraph 3.152) recognises circumstances where it would be inappropriate to apply the Regulation including where flats are above entry level and the incorporation of lift is not possible, as in this case.

4.20. A comment was made about the provision of adequate waste storage to serve the new dwellings. A bin store would be provided adjacent to the bike store, accessed from Glenilla Road. If the application was otherwise considered to be acceptable, final details of waste storage could be agreed by condition.

4.21. Overall, the proposals are considered to be acceptable in this respect

## **5. Trees and landscaping**

5.1. Policy D1 of the Local Plan seeks development which incorporates high quality landscape design and maximises opportunities for greening, for example through planting of trees and other soft landscaping. Policy A3 of the Local Plan seeks to protect and secure additional trees and vegetation. The policy notes that the Council will resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation. The Council will also require trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development.

5.2. The proposed development does not involve the loss of any trees from the site; however, concerns have been raised about the impact on vegetation around the edge of the building and the grassed areas to the front during the construction period as scaffolding would be required and the draft Construction Management Plan indicates the use of the area at the front for a two storey welfare cabin.

5.3. If the application was otherwise considered to be acceptable, a planning condition could require the submission of details of tree protection methods during the construction period. With regards to damage caused to the area at the front of the building, it would be in the interests of the building's management company to restore the site to its former condition following the completion of the works, particularly if they are looking to sell the new flats. Furthermore, if the site was not tidied up following the works, the Council could choose to serve a Section 215 notice if it felt that the site was having an adverse impact on the character and appearance of the wider area.

5.4. Overall, the proposals are considered to be acceptable in this respect

## **6. Biodiversity**

6.1. Policy A3 of the Local Plan also aims to support the London Biodiversity Strategy and the Camden Biodiversity Action Plan (BAP) by ensuring that Camden's growth is accompanied by

a significant enhancement in the borough's biodiversity. The policy notes that the Council will assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed.

6.2. Areas for planting are provided outside each of the new openings, which would contribute positively to biodiversity at the site. If the application was otherwise considered to be acceptable, a planning condition could require the provision of bird and bat boxes at the site as part of the development.

## **7. Impact on neighbours**

7.1. Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The policy notes that the factors to consider include: visual privacy and outlook; sunlight, daylight and overshadowing; artificial lighting levels; impacts of the construction phase; and noise and vibration. Policy A4 also seeks to ensure that noise and vibration is controlled and managed.

7.2. The main properties that are likely to be affected by the proposals are the properties in the existing building (Howitt Close), and neighbouring properties on Howitt Road, Glenilla Road, Belsize Park Gardens and Belsize Grove.

7.3. At the time of the previous application, it was noted that the proposed development would be unlikely to give rise to unacceptable levels of overlooking to neighbouring properties, and this remains the case. The existing flats within the building already have views to the neighbouring properties on Howitt Road, Belsize Park Gardens and Belsize Grove and, whilst the additional floor level may impact on perceived levels of overlooking from the building to its neighbours, the separation distances roughly comply with or exceed those outlined in CPG Amenity (i.e. > 18 metres). The separation distance between the host building and the buildings to the south on Belsize Park Gardens is approximately 19 metres; the separation distance between the host building and Straffan Lodge (on Belsize Grove) is in excess of 30 metres; and although the properties on the opposite side of Howitt Road (to the north / north-west) (including 62 Howitt Road) are only a minimum of approximately 17 metres away, this is considered to be acceptable as a similar relationship exists between the front-facing elevations of other properties in the street.

7.4. At the time of the previous application, it was noted that the proposed roof extension would not impact harmfully on the outlook from neighbouring properties, and this remains the case. This is due to the fact it is only single storey in height and due to the separation distances outlined above.

7.5. Similarly, at the time of the previous application it was not considered that the proposed works would cause significant loss of sunlight or daylight or overshadowing to neighbouring properties. This is on the basis that the building is only being extended up by one storey and taking into consideration the orientation of the building, the separation distances to neighbouring buildings and the path of the sun. There may be some impact to No. 57 Howitt Road as it is located directly to the north of the application building; however, the rear of this building would still continue to receive sunlight in the morning (when the sun is in the east) and it is already likely to be overshadowed in the afternoon (when the sun is in the west) as a result of both the application building and No. 57 itself. A daylight and sunlight analysis was provided as part of the abovementioned appeal, which concluded that there would be no harmful impact on neighbouring properties. The Inspector acknowledged that BRE guidelines are only advisory but commented that, based on his site visit observations, there would be no significant loss of daylight or sunlight to the occupiers of neighbouring housing.

7.6. It is not considered that the proposed development would cause undue harm as a result of artificial lighting. If the application was otherwise considered to be acceptable a planning

condition could require the submission of details of any external lighting proposed.

7.7. It is not considered that the proposal would cause undue harm in terms of noise or general comings and goings. The number of residential units in the building would increase by 7, which is not significant. Any noise associated with the additional dwellings would be likely to be considered acceptable in this built-up residential area.

7.8. There would likely be some impact during the construction period. A draft Construction Management Plan (CMP) has been submitted with the application. If the application was otherwise considered to be acceptable, a final Construction Management Plan (including implementation support fee) and Construction Impact Bond could be secured by section 106 legal agreement, to help mitigate the impact on local residents. The lack of a section 106 agreement to secure this forms a reason for refusal.

## **8. Transport considerations**

8.1. The application site has a PTAL rating of 3 (average) and is within a Controlled Parking Zone (CA-B Belsize: Mon-Fri 0900-1830; Sat 0930-1330; Sun n/a).

### Cycle parking

8.2. Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. For this proposal, the London Plan requires 2 spaces per dwelling and an additional 2 visitor spaces ( $14 + 2 = 16$ ). The plans indicate proposed cycle storage adjacent to Glenilla Road; however, no further details have been provided. If the application was otherwise considered to be acceptable final details could be secured by condition.

### Car free

8.3. Policy T2 of the Local Plan seeks to limit the availability of parking and requires all new developments in the borough, including redevelopments (and changes of use) with new occupiers, and including where dwellings are created as part of an amalgamation or sub-division, to be “car-free” (i.e. future occupiers would not be able to apply for parking permits for the local area). If the application was otherwise considered to be acceptable, the new dwellings could be secured as car-free through a section 106 legal agreement. The lack of a section 106 agreement to secure this forms a reason for refusal.

### Construction impact

8.4. Policy T4 of the Local Plan promotes the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road. As noted above, a draft CMP has been submitted with the application, which the Council’s Transport Officer is satisfied with. If the application was otherwise considered to be acceptable a final Construction Management Plan (including implementation support fee) and Construction Impact Bond could be secured by section 106 legal agreement, to mitigate the impact on the local highway. The lack of a section 106 agreement to secure this forms a reason for refusal.

## **9. Energy and sustainability**

9.1. Policy CC1 of the Local Plan requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. The policy promotes zero carbon development and requires all development to reduce carbon dioxide through following the steps in the energy hierarchy; and expects all developments to optimise resource efficiency.

9.2. Policy CC2 requires development to be resilient to climate change by adopting climate change

adaptation measures, for example not increasing and wherever possible reducing surface water run-off through increasing permeable surfaces and use of Sustainable Drainage Systems; incorporating bio-diverse roofs, combination of green and blue roofs and green walls where appropriate; and measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy. The policy also notes that the Council will promote and measure sustainable design and construction.

9.3. An Energy and Sustainability Statement has been submitted with the application. Be Lean measures include passive design measures such as enhanced building fabric (high levels of insulation, high performance glazing), air tightness and waste water heat recovery; and active design measures such as high efficiency lighting and mechanical ventilation with heat recovery (MVHR). No Be Clean measures are proposed. Be Green measures include the use of solar PV panels. The previous application did not include any plans of the proposed solar PV panels, but this application provides an indication of the proposed locations and extent of the PV panels, thereby helping officers to understand the potential visual impact on the host building and the wider area.

9.4. Overall, a carbon reduction of 28.64% should be achieved, including 25.21% through renewable technologies, which is in accordance with policy. If the application was otherwise considered to be acceptable, the energy and sustainability measures could be secured by section 106 legal agreement and a planning condition could require the submission of final details of the solar PV. The lack of a section 106 agreement to secure this forms a reason for refusal.

9.5. The statement also notes that the development would achieve a maximum internal water use of 105 litres per day per person. If the application was otherwise considered to be acceptable, this could be secured by condition.

**Recommendation:** Refuse planning permission for the following reasons:

1. The proposed roof extension, by reason of its height, massing, design and undue prominence, would visually overwhelm features that are an integral part of the host building's design and significance, namely the flat roof with its deep eaves, above the rendered third floor and brick lower storeys, 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.
2. The proposed development, in the absence of a legal agreement to secure a contribution to affordable housing, would fail to maximise the contribution of the site to the supply of affordable housing in the borough, contrary to policies H4 (Maximising the supply of affordable housing) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.
3. The proposed development, in the absence of a legal agreement to secure the energy and sustainability measures, would fail to minimise the effects of climate change, contrary to policies CC1 (Climate change mitigation) and CC2 (Adapting to climate change) of the London Borough of Camden Local Plan 2017.
4. The proposed development, in the absence of a legal agreement securing a Construction Management Plan, implementation support fee and Construction Impact Bond, would be likely to give rise to conflicts with other road users and be detrimental to the amenity of the area generally, contrary to policies A1 (Managing the impact of development), T4 (Sustainable movement of goods and materials) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.
5. The proposed development, in the absence of a legal agreement to secure the new dwellings as "car-free", would be likely to contribute unacceptably to parking stress and congestion in the surrounding area, contrary to policies T2 (Parking and car-free development) and DM1 (Delivery

and monitoring) of the London Borough of Camden Local Plan 2017.