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# FREETHS

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Camden Council  
Development Management  
Camden Town Hall Extension  
Argyle Street  
London  
WC1H 8EQ

Direct dial: 0845 050 3676  
Direct fax: 0115 859 9642  
Switchboard: +44 (0)115 936 9369  
Email: [lix.young@freeths.co.uk](mailto:lix.young@freeths.co.uk)

27 July 2021

Our Ref: 2168538/1/LXY/1683

By Email [planning@camden.gov.uk](mailto:planning@camden.gov.uk)

Dear Sirs,

**RE: HOWITT CLOSE - HOWITT ROAD, BELSIZE PARK, LONDON, NW3 4LX**  
**APPLICATION FOR PLANNING PERMISSION FOR ROOFTOP EXTENSION FOR 7 DWELLINGS**

Freeths LLP are instructed by our client, Daejan Properties Limited (“DPL”) to submit an application for a rooftop extension to create 7 residential dwellings at Howitt Close, Howitt Road, Belsize Park, London, NW3 4LX (“the site”).

The application submission is supported by the following documents which accompany this covering letter:

1. Design and Access Statement
2. Heritage Statement
3. Construction Management Plan (including Air Quality Management Plan)
4. Energy and Sustainability report
5. CIL Liability Form

The supporting plans are as follows:

1. D-003 – Existing Site Plan
2. D-005 – Existing Front Elevations
3. D-006 – Existing Rear Elevations
4. D-012 Rev B – Proposed Site Plan
5. D-013 Rev C – Proposed Third Floor Plan
6. D-014 Rev A – Proposed Roof Plan
7. D-015 Rev B – Proposed Front Elevations
8. D-016 – Proposed Rear Elevations
9. D-017 – Proposed Section AA

The fee of £3,234.00 has been submitted via the planning portal.

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## The Site

The application site represents a 3 storey with part basement 'L' shaped residential block which was constructed in the 1920's.

The building is located on the bend at the southern end of Howitt Road at its junction with Glenilla Road. The area immediately surrounding the application site is residential in nature. The surrounding properties are 3, 4 and sometimes 5 storeys in nature along Belsize Grove and Belsize Park Gardens and 2 storeys with mansard roofs along Howitt Road. The majority of properties are terraced. Views of the site exist along both Howitt Road and Glenilla Road.

The site is located within the Belsize Conservation Area and specifically sub area 4. The building is identified by Camden Council as a building that makes a positive contribution to that.

The existing building is 'L' shaped in plan with 2 wings and a centralised entrance and stairwell. Externally the building has two lower floors of brickwork and a top floor of render. There is a large projecting coping at the top of the existing walls and a large flat roof. Windows to the principal living spaces comprises a tri-partite arrangement with a single, six light aperture to the centre, with flanking two light apertures, all with glazing bars. These are set within projecting bays that add interest to the rhythm of the elevations.

A small quantum of communal amenity space surrounds the building. There is no parking on the application site.

## The Proposal

The scheme proposes a mansard roof extension with projecting dormers to create 7 additional residential dwellings with the following mix:

Flat No.	Size	Area
1	2 bed, 4 person	75
2	2 bed, 4 person	77
3	2 bed, 3 person	69
4	1 bed, 2 person	57
5	3 bed, 4 person	78
6	2 bed, 3 person	71
7	2 bed, 4 person	70

## Relevant Planning History

In March 2020 an initial proposal for a rooftop extension to provide 7 additional dwellings was submitted for pre-application advice (application reference 2020/1404/PRE). The proposal was for a mansard roof extension to the property. A virtual meeting was held with officer on 30 April 2020 to discuss the proposals.

The principle of providing additional residential floorspace in this location was identified as acceptable, and the housing mix, which proposed mostly 2 bed units was welcomed. However the principle of the mansard roof was not considered by Officers to be appropriate to the age and character of the building. The report identified that the dormer windows appeared inelegant with chunky windows that did not suit the refined nature of the host building and glazed balustrades to the terraces which jarred heavily with the character of the building.

Following this advice revised drawings were then submitted on 22 July 2020 as part of an informal discussion with Officers. The revised scheme proposed an attic storey to the building as opposed to a mansard roof. The attic storey proposed a series of projecting bay windows and narrower slot windows in the recesses to align with the fenestration pattern of the lower floors. In order to respect the cantilevered eaves, which were mentioned as unique features in the first pre-application response, as well as respecting the hierarchy of the main building, the attic storey was set back further than the mansard roof. All balconies were removed from the scheme.

The drawings were taken to design surgery on 4 August. Whilst the revised roof was considered an improvement on the mansard proposal the design was considered to lack the finesse required for the character of the building. The proposal was considered too offset from the eaves and took more of the form of an extended storey rather than a roof.

A second pre-app was submitted in October 2020 (application reference 2020/5007/PRE), again for the same quantum of development, but with a differing design for the rooftop. Feedback received from officers identified that the proposed roof extension had a more comfortable relationship with the host building, and the chamfered eastern corner was acceptable. Concern was raised about the white rendered projecting dormers, and a request was made for these to be reduced in size. In respect of materiality a traditional material was considered most appropriate. Informal feedback was then provided on revised drawings, and discussions regarding the detail of the proposal.

## **Planning Policy**

The Development Plan comprises the London Plan ("LP") adopted in 2021 and the Camden Local Plan ("CLP") adopted in 2017. The relevant policies are listed below and considered in the 'Planning Appraisal' section.

### London Plan (2021)

- GG2 Making the best use of land
- GG4 Delivering the homes Londoners need
- D3 Optimising site capacity through the design-led approach
- D6 Housing quality and standards
- H1 Increasing housing supply
- H2 Small sites
- H4 Affordable Housing
- H5 Threshold approach to applications
- H10 Housing size mix
- HC1 Heritage conservation and growth
- T5 Cycle Parking
- T6 Car Parking

### Camden Local Plan (2017)

- G1 Delivery and location of growth
- H1 Maximising housing supply
- H4 Maximising the supply of affordable housing
- H7 Large and small homes
- A1 Managing the impact of development
- D1 Design
- D2 Heritage
- CC1 Climate change mitigation
- CC3 Water and flooding
- CC5 Waste
- T1 Prioritising walking, cycling and public transport
- T2 Car-free development and limiting the availability of parking
- DM1 Delivery and Monitoring

### Other Material Considerations

The National Planning Policy Framework (NPPF) is a material consideration in the determination of the application and is referenced and considered, where appropriate, in the planning appraisal section. In addition, there are a number of planning guidance documents that will be relevant to the development proposal and these include:

- Belsize Conservation Area Statement
- Camden Planning Guidance
  - o Design
  - o Housing
  - o Sustainability
  - o Amenity
  - o Transport
  - o Developer Contributions
  - o Housing

### **Planning Appraisal**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act (1990) require planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

### Principle of Development

LP Policy GG2 seeks to explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. LP Policy GG4 seek to ensure more homes are delivered and create mixed and inclusive communities, with good quality homes that meet high standards of design. CLP Policy H1 identifies

that self-contained housing is the priority land use of the Local Plan. As such the principle of additional residential development in this location is acceptable.

The scheme is for 5 no. 2 bed units, 1 no. 3 bed unit and 1 no. 1 bed unit. CLP Policy H7 seeks to secure a range of homes of different sizes that contribute to the creation of a mixed, inclusive and sustainable community. As such housing developments should contribute to meeting the priorities set out in the dwelling size priority table and include a mix of large and small homes. The dwelling size priority table identifies that for market housing the need is high for both 2 and 3 bedroom homes and lower for 1 and 4 bedroom homes. Accordingly the mix of dwellings provided in this development meets the priority needs for housing and is in accordance with CLP policy H7.

#### Affordable Housing

CLP Policy H4 requires a contribution to affordable housing from all developments that provides 1 or more homes and a total floorspace addition of 100 sq m. In developments of less than 10 units affordable housing contributions can take the form of a payment in lieu. A policy compliant affordable housing contribution will be provided by this development.

#### Design

LP Policy D3 seeks to make the best use of land and requires development proposals to enhance local context and respond to local distinctiveness. CLP Policy D1 identifies that the Council will seek to secure high quality design in development by requiring development to, amongst other criteria, respect local context and character, preserve or enhance the historic environment and heritage assets and comprise details and materials that are of high quality and complement the local character.

In massing terms the attic storey continues the hierarchy articulated in the existing building, with the dormers denoting the major spaces, as is currently done by the projecting bays, and the smaller set back dormers denoting secondary spaces. Full alignment is achieved with the fenestration below. This creates a distinction between major and minor spaces in the building (with the projecting major spaces containing living spaces and main bedrooms and the recessed minor spaces containing second bedrooms, bathrooms and circulation spaces), and reflects the pattern of development along Howitt Road.

The cantilevered eaves detail that runs around the perimeter of the building is retained within the proposal. To maintain the integrity of that detail, the new roof form is recessed with the mansard walls aligned with the recessed walls below. The chamfer on the corner of the building is now replicated in the roof storey.

The new bay windows reflect the tripartite fenestration pattern of the windows on the lower floors. Detail is given through glazing bars and framing in a contrast material. The proposed slender frames to the dormer windows reference the brick detailing around the existing openings at lower levels.

The materials proposed for the project are sympathetic to the host building and comprise red clay tiles with dormers clad in zinc.

The proposal therefore fully accords with CLP Policy D1 and LP Policy D3.

### Heritage

CLP policy D1 seek to preserve and enhance the historic environmental and heritage asset and respect local context and character. CLP policy D2 requires development within conservation areas to preserve, or where possible, enhance the character of appearance or the area. A Heritage Statement has been undertaken by Cotswold Archaeology and submitted in support of this application.

The Heritage Statement identifies that the mansard roof is a distinct part of the surrounding built environment and a key feature of the Conservation Area. The addition of a mansard storey at the property therefore creates a feature that accords with the prevailing character of the terraced housing that dominates Howitt Road.

The Heritage Statement also states that the increase in height of the building as a result of this proposal would be proportionality small and would not adversely impact the scale and mass of the building and its surroundings.

The addition of the mansard storey is therefore considered to represent an overall enhancement to the character and appearance of the Conservation Area. In heritage terms the proposal is in accordance with Local Plan Policy D1 and D2 and London Plan Policy HC1.

### Amenity

LP Policy D6 and CLP Policy A1 seek to protect the quality of life of occupiers and neighbours and identify that development should not cause unacceptable harm to amenity.

LP Policy D6 seeks to maximise the provision of dual aspect dwellings. 5 of the 7 proposed flats are dual aspect and meet this requirement. Flat 3 and 4 are single aspect flats, however it is noted that single aspect flats are acceptable where the development is providing an appropriate design solution to meet the requirements of policy D3, which seeks to optimise site capacity. As the proposal is for an extension to an existing building, the provision of a small number of single aspect flats is unavoidable due to the existing footprint and layout of the building. Flats 3 and 4 will have adequate ventilation, daylight and privacy, and therefore still accord with LP policy D6.

Due to the design of the proposed scheme, the additional flats, in a manner similar to the existing residential properties, will not have their own private amenity space. This is because the introduction of balconies onto the roof of the building would compromise the design and appearance of the proposal and of the building as a whole. Residents will however have access to the communal amenity space around the building.

All other requirements for space and amenity in LP policy D6 as set out in the information in the accompanying Design and Access Statement.

CLP Policy A1 seek to protect the quality of life of occupiers and neighbours through factors such as visual privacy, outlook, sunlight, daylight and overshadowing, transport impacts and impacts of the construction phase.

Due to separation distances and the existing building the additional height of the proposed development will not create any issues with regards to sunlight/daylight of adjoining properties along Belsize Grove or Belsize Park Gardens.

In respect of overlooking the separation distance to properties in Belsize Grove means that over 18m separation between habitable windows, as set out in the Amenity SPG document, is achieved. In respect of the properties on Glenilla Road the proposal will not have any significantly detrimental impacts over and above that which already takes place with the existing building.

A draft construction management plan is submitted as part of the application to consider issues with regards to the construction of the development in respect of highway, noise and air quality. This will be enhanced and expanded as the development process continues.

The amenity of both existing and proposed residents will therefore be adequately protected in accordance with CLP and LP policies.

### Highways

CLP Policy T1 seeks to promote sustainable transport by prioritising walking, cycling and public transport in the borough. As such it requires developments to provide for accessible, secure cycle parking facilities exceeding minimum standards outlines within the London Plan.

LP Policy T5 identifies a requirement for 16 cycle spaces, and those will be provided in the cycle store shown on the site plan.

CLP Policy T2 identifies that the Council will limit the availability of parking and require all new development in the borough to be car-free. In accordance with this policy no parking is proposed as part of the development. If a unilateral undertaking is required to restrict residents from applying for on-street parking permits this will be acceptable.

### Sustainability

CLP Policy CC1 requires development to minimise the effect of climate change and meet the highest feasible environmental standards that are financially viable during construction.

The Energy and Sustainability Statement undertaken by Environmental Services Design and submitted in support of this application demonstrates how the requirements of policy CC1 have been met.

The development will achieve a 20% CO2 reduction against Part L (2013 Building Regulations) from on-site renewables and this includes through the incorporation of photovoltaics.

CLP Policy CC3 requires development to incorporate water efficient measures. In accordance with this the development will minimise the use of mains water by achieving a maximum indoor water consumption of 105 litres per person per day.

### **Conclusion**

The proposed development, which consists of a mansard roof extension to the building, provides an appropriate design response to the existing building whilst maximising the use of the land and delivering much need housing for the area. The seven units meet the size requirements of the borough, and the scheme will deliver a policy compliant affordable housing contribution.

The design of the mansard roof respects the buildings key features, including the projecting cantilevered eaves, and creates a design which is sensitive to the building and the setting of the conservation area.

The impact of the proposed development on the amenity of existing and proposed occupiers is considered acceptable.

The scheme therefore complies with the requirements of the development plan and is in accordance with the provisions of paragraph 11 of the NPPF. As such we ask that permission is granted without delay.

If any additional information or clarification is required please do not hesitate to contact me.

Yours sincerely

This letter is approved but unsigned as it is sent electronically.

Liz Young  
Senior Associate  
Planning and Environment Group

Please respond by e-mail where possible