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**Date: 12/05/2020**  
**Our ref: 2020/1404/PRE**  
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Freeths LLP  
Cumberland Court,  
80 Mount Street  
Nottingham  
NG1 6HH  
*By email*

Dear Liz Young,

**Re: Howitt Close, Howitt Road, London, NW3 4LX**

Thank you for submitting a pre-planning application enquiry for the above property together with the required fee of £3,708.81. A virtual meeting was held on 30<sup>th</sup> April to discuss the proposals.

**1. Proposal**

The proposal seeks to add an additional storey to the building via a mansard roof extension in order to provide a further 7 residential units (6 x 2-beds and 1 x 1-beds)

**2. Site description**

The application site is an L-shaped three-storey block of flats of 1930s construction, identified as making a positive contribution to sub area 4 (Glenloch) of the Belsize Conservation Area. The character of the surrounding area is residential and largely consists of Edwardian semi-detached and terraced houses.

**3. Relevant planning history**

**TP948/12543** - The construction of an additional floor at third floor level containing fourteen self-contained flats at "Howitt Close", Howitt Road, Hampstead. **Refused 29/09/1961 on density (excessive for area) and impact on daylighting standards (to neighbouring occupiers)**

**4. Relevant policies and guidance**

National Planning Policy Framework 2019

The London Plan 2018

Intend to Publish London Plan 2019

**Camden Local Plan 2017**

G1 Delivery and location of growth  
 H1 Maximising housing supply  
 H4 Maximising the supply of affordable housing  
 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

**Camden Planning Guidance 2018/ 2019**

CPG (Design)  
 CPG (Housing)  
 CPG (Sustainability)  
 CPG (Amenity)  
 CPG (Transport)  
 CPG (Developer's Contributions)

Belsize Conservation Area statement (2001)

**5. Assessment**

The planning considerations material to the determination of this application are as follows:

- Land use
- Housing
  - standard of accommodation
  - affordable housing contribution
- Design
- Amenity
- Transport
- CIL

**Principle of residential accommodation**

Self-contained housing is identified as the priority land use of the Local Plan and there is no objection to the principle of providing additional residential floorspace in this location.

The scheme proposes 6 x 2- bed units and a 1-bed unit. 2-bed units are identified in the Local Plan as being of high priority (Dwelling Size Priority Table, policy H7) and as such, the overall unit mix is welcomed by the Council.

*Affordable housing contribution*

Policy H4 expects a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to the residential floorspace of 100sqm GIA or more. This is based on an assessment where 100sqm of floorspace is considered to be capacity for one home. In developments that provide less than 10 units, affordable housing contributions can take the form of a payment in lieu.

The proposal would provide seven new homes and an additional 462 sqm (GIA) of residential floorspace.

The affordable housing target as detailed in policy H4 and its supporting text is based on a sliding scale with the target starting at 2% for an additional home (at 100sqm) and is increased by 2% for each home added to the capacity. The residential floorspace provided is 462 sqm GIA; therefore rounded up to 500 sqm for this purpose, resulting in the affordable housing target being 10% for this scheme.

Payments in lieu are taken from a figure based on the gross external area (GEA) of the application floorspace concerned. The GEA of the first floor level is calculated at 577.50 sqm (using the standard multiplier of 1.25 due to the inclusion of common areas). The level of payment in lieu for a market residential scheme is £2,650 per sqm, as detailed in CPG Housing.

The affordable housing contribution for this proposal is £153,037.50. This is calculated by 10% (the affordable housing target) of 577.50 sqm (the GEA) which results in 57.75 sqm. The value for this is then multiplied by £2,650 to get the payment figure of £153,037.50. The affordable housing contribution would be achieved via a Section 106 legal agreement upon approval of the proposal.

### Residential Standards

The proposals would provide 6 x 2bed units and 1 x 1bed unit. All units would comply with the Nationally Described Space Standard, the relevant standards of which are provided below.

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings
1b	1p	39 (37) *
	2p	50
2b	3p	61
	4p	70

All new and converted residential dwellings are required to have acceptable outlook, daylight and ventilation. Of the seven units, two would be single aspect (one of these would have windows on two elevations but one window would have very poor outlook and as such is considered single aspect); however, this is hard to avoid given the extension continues the floorplate upwards. One of the units is the smaller 1-bed unit and is also south facing which is considered to mitigate the impact; however, the other single aspect unit is north facing. Should a satisfactory design response be presented, it is advised that you try to avoid including north facing single aspect units.

## Design and conservation

The Council's design policies are aimed at achieving the highest standard of design in all developments and policy D1 requires developments to consider the character, setting, context and the form and scale of neighbouring buildings, as well as the quality of materials to be used. Policy D2 'Heritage' states that within conservation areas, the Council will only grant permission for development that 'preserves and enhances' its established character and appearance.

CPG Design includes further guidance whilst the Belsize Conservation Area statement provides an indication of the Council's approach to new development in the Belsize Conservation Area.

The existing building is constructed as two brick storeys topped with a white roughcast one. This two-plus-one composition, with the use of a pale storey above a darker mass below, combined with the topography of the street which gently declines towards the site, means that although at three full storeys above ground it technically contains a storey more than the surrounding houses, it does not appear more bulky. In addition, the scale has been carefully designed, with the use of setbacks and tripartite "bay windows", giving a plot width akin to that of a house, and through the use of domestic materials – red brick and roughcast – as seen on houses across the street. As it stands, it is considered to be a complete composition of considerable charm which, through good design suits its context well.

The site is prominent, being adjacent to a T-junction and addressing a curve in the road. This means that it is visible in long views along Howitt Road from the north-east and along Glenilla Road from the north-west. It is also freestanding, set apart from surrounding buildings, particularly to the south-west, and this means it is highly visible. Any alterations to its height would therefore be visually prominent from various points in the streetscape.

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.

Any extension would also have to be mindful of the prevailing height of surrounding buildings. The relevant streetscape to the building, is less the larger buildings of Belsize Park Gardens as shown in the drawings, but the smaller scale of Howitt Road which the building addresses. Although the drawings show hipped roofs on Belsize Park Gardens behind as visible, when seen in real life, they are not as tall as they appear in the drawings and are in any case a considerable distance behind the site. A wider street elevation that includes the properties on Howitt Road should therefore be provided as part of any future pre-application.

The mansard as shown is not thought to be appropriate to the age and character of the building and feels to be a somewhat "off the shelf" response

Notwithstanding the unacceptability of the mansard, its form appears traditional with 70 degree slopes. Most mansard additions are situated behind a parapet upstand; however, the host building does not have this feature. It would therefore be possible to read the entire height of the mansard on top of the flat roof. To achieve a more subordinate form, it

may be necessary to reconfigure the existing second storey. The dormer windows appear inelegant, with chunky windows that do not suite the refined nature of the host building. The glazed balustrades to the terraces jar heavily with the character of the building and are not considered an appropriate feature nor choice of material.

### **Amenity**

The proposals have potential to bring about significant noise and disruption to existing occupiers of Howitt Close. A construction management plan (see transport section for more detail) would be required to help mitigate impacts but before this stage, you are strongly advised to consult with existing occupants and involve them in the process.

In its current form, the additional height of the building – by virtue of the distance from nearest windows, in addition to its set back and sloping form - would prevent a noticeable impact on light received by the rear windows of those properties on Belsize Grove and Belsize Park Gardens.

The rear balconies situated above the projecting bays would be at a distance of 18.5m from the rear windows. Whilst compliant with the 18m recommended by CPG Amenity, views of the rear gardens would be at much closer distance and plus there would be five new balconies associated with five different units. Although there are existing windows that face on to the rear of the Belsize Park Gardens properties, sitting out areas result in a greater sense of perceived loss of privacy than a window.

### **Transport considerations**

#### *Cycle parking*

Two ground floor locations have been identified for cycle storage. The facilities would need to allow for 13 spaces (2 spaces per 2-bed; 1 space per 1-bed). It is apparent that sufficient space is available on-site to meet the requirement.

Please refer to CPG Transport for information on how cycle storage should be designed to be fully accessible and secure.

#### *Car parking*

Policy T2 requires all new developments to be 'car free' to avoid adding to parking pressures and congestion as well as encourage more sustainable modes of travel. All additional units would therefore be secured as such by way of a section 106 legal agreement.

#### *Construction management plan*

A construction management plan (CMP) and associated CMP Implementation Support Contribution would be required to be secured by Section 106 Agreement for the site, in accordance with Policy A1 and Policy T4 of the Camden Local Plan.

Our primary concern is public safety but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality), especially those currently living in Howitt Close. The Council needs to ensure that the

development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

A detailed draft CMP should be submitted (using the Council's pro-forma on the [website](#)) at application stage to help inform consultation responses. Please see CPG Transport for more details.

### **Sustainability**

Policy CC1 states that the Council will require development to incorporate sustainable design and construction measures. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. All minor residential developments (over 1+ unit) are expected to submit a sustainability statement - the detail of which to be commensurate with the scale of the development showing how the development will:

- Implement the sustainable design principles as noted in policy CC1
- Demonstrate that the development is capable of achieving a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use).

Further information regarding the Council's requirements regarding Climate Change mitigation measures are outlined within CPG Energy efficiency and adaptation.

### **Community Infrastructure Levy (CIL)**

You are advised that this proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL as the additional floorspace exceeds 100sqm GIA or one unit of residential accommodation. Based on information given on the plans relating to the 7 units, the Mayor's CIL Charging Schedule and the Camden Charging Schedule, the charge is likely to be £2,410 (462 sqm x £50) for the Mayor's CIL and £24,100 (462 sqm x £500) for the Camden CIL.

This amount is an estimate based on the information submitted in your pre-application enquiry. The liable amount may be revised on the receipt of the CIL Additional Information Requirement Form or other changes in circumstances. Both CIL's will be collected by Camden after the scheme has started and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement and/or for late payment. We will issue a formal liability notice once the liable party has been established. CIL payments will also be subject to indexation in line with the construction costs index.

## **6. Conclusion**

The advice has highlighted the highly challenging nature of the site. If a roof extension is to be possible then a high quality architectural response based on a thorough understanding of the building's history and character will be crucial.

To reiterate, you are strongly advised to consult with the building's existing leaseholders throughout the process.

## **7. Planning application information**

Should you submit a planning application that addresses the concerns, I would advise you to submit the following for a valid planning application:

- Completed form – Full Planning Application
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed' (including street elevations)
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and access statement
- Heritage statement
- Sustainability statement
- CIL Liability Form
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. The Council must allow 21 days from the consultation start date for responses to be received. You are strongly advised to carry out your own consultation with surrounding occupiers to discuss the proposals prior to application stage.

Non-major applications are typically determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

If you have any queries about the above letter or the attached document please do not hesitate to contact Kristina Smith on **020 7974 4986**

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Kristina Smith

**Senior Planning Officer  
Planning Solutions Team**