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Our ref: 2020/5007/PRE
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Dear Liz Young,

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

Thank you for submitting a follow up pre-planning application enquiry for the above property together with the required fee of £1,891.50. The advice should be read in conjunction with advice issued on 12/05/2020 under ref. 2020/1404/PRE and informal follow up advice issued via email on 05/08/2020.

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 (5 x 2-beds, 1 x3-bed and 1 x 1-bed)

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 2016

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)

Draft Housing CPG 2020 (yet to be adopted)

Belsize Conservation Area statement (2001)

5. Assessment

The planning considerations which would be material to the determination of an application for the above works to this property 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 5 x 2- bed units, a 3-bed unit and a 1-bed unit. 2 and 3 bed units are identified in the Local Plan as being of high priority (Dwelling Size Priority Table, policy H7) whilst 1-beds are lower priority. 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 7 new homes and an additional 481 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 481 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 to include 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 £159,344.50. This is calculated by 10% (the affordable housing target) of 601.25 sqm (the GEA) which results in 60.13 sqm. The value for this is then multiplied by £2,650 to get the payment figure of £159,344.50. The affordable housing contribution would need to be secured via a Section 106 legal agreement if planning permission were granted.

You are advised that following the adoption of the new Housing CPG, which is expected in January 2021, the payment-in-lieu figure for affordable floorspace will increase to £5,000 per sqm (GIA) resulting in a payment-in-lieu for this proposal of £240,500 (481 x 10% x £5,000).

Residential Standards

The proposals would provide 7 units in total, as follows: 5 x 2-bed units, 1 x 3-bed and 1 x 1-bed unit. All units would generally comply with the Nationally Described Space Standard (see further detail on Flat 5 below), the relevant standards of which are provided below.

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	

Flat 5 is shown as a 3-bed on the floorplan but referred to as a 2-bed in the accommodation schedule. This should be consistent at planning application stage. It is also shown as a 3b5p; however, the available floorspace (78 sqm) would limit the unit from providing two double bedrooms. One of the doubles could be reduced in size allowing for a larger living room.

All new and converted residential dwellings are required to have acceptable outlook, daylight and ventilation.

Of the seven units, four would be single aspect including the larger three-bedroom unit (Flat 5) and a north-facing unit (Flat 3). North-facing single aspect units and single aspect units larger than 2-beds are strongly discouraged by the Mayor's Housing SPG. To address this for Flats 5 and 6, it may be possible to include windows on the northern most elevation.

Otherwise, the units have large windows and good access to natural light and ventilation.

In terms of unit layout, you are encouraged to ensure layouts are as efficient as possible and maximise usable internal floor space. In Flat 5 for instance, it looks to be possible to give some corridor over to bathroom space.

The units at second floor are wholly studio/1-bed units which results in it being impossible to stack the units so that noise sensitive rooms (i.e. bedrooms) are not directly underneath noisier rooms such as living spaces, kitchens and bathrooms. You are therefore advised of the requirement to provide appropriate sound insulation between the floors.

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 and throughout the pre-application process three iterations have been reviewed by officers.

The following advice is provided as feedback on the latest iteration:

- The progress that has been made throughout the pre-application process is encouraging and the form of the roof extension now has a more comfortable relationship with the host building;
- The mansard's response to the chamfered eastern corner is now thought to be a successful one;
- The key problematic feature that remains is the larger white rendered projecting dormers. Their relationship with the mansard roof appears awkward, with the top of the mansard overlapping the main roof and creating an unsatisfactory junction. The additional height created by the dormer rising higher than the mansard roof does not appear necessary in terms of achieving desirable internal head room.
- The more lightweight slimline dormers are considered to be more effective and achieve a more sensitive relationship with the mansard roof and host building. We would welcome seeing a further design iteration with a dormer of this character and style in place of the largest white rendered dormers.
- In terms of materiality, a traditional material is thought appropriate and we would encourage you to consider copper which feels fitting for a building of this age and character and the weathering process would bring about a complementary contrast with the warm brick tones and white render of the host building.

Amenity

The construction process could potentially 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 proposed windows would not bring about a material loss of privacy to the closest windows of the properties on Belsize Park Gardens.

Transport considerations

Cycle parking

Two ground floor locations have been identified for cycle storage. The facilities would need to allow for 14 long stay spaces (2 spaces per 2-bed; 1.5 space per 1-bed) and 2 short stay spaces to be compliant with the emerging London Plan minimum standards. 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 and CMP bond 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 with a total floorspace of 481 sqm GIA, the Mayor's CIL Charging Schedule and the Camden Charging Schedule, the charge is likely to be £38,480 (481 sqm x £80) for the Mayor's CIL and £309,764 (481 sqm x £644) 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. 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

Planning Officer
Planning Solutions Team