

---

# FREETHS

---

HOWITT CLOSE - HOWITT ROAD, BELSIZE PARK, LONDON, NW3 4LX

APPLICATION FOR PLANNING PERMISSION FOR  
ROOFTOP EXTENSION FOR 7 DWELLINGS

RESPONSE TO HERITAGE OBJECTION

---

1. Freeths LLP on behalf of the applicant, Daejan Properties Limited (“DPL”), submitted an application for a rooftop extension to provide 7 no. residential dwellings at Howitt Close, Howitt Road, Belsize Park, London, NW3 4LX (“the site”) in September 2021.
2. The application submission acknowledged that the site is located within the Belsize Conservation Area, sub area 4, and that the building is identified by Camden Council as a building that makes a positive contribution to the Conservation Officer. It was also noted that the building is not included on Historic England’s National Heritage List for England and does not feature on Camden’s Local List of heritage assets.
3. The application was supported by a Heritage Statement undertaken by Cotswold Archaeology (dated July 2021) which concluded that the addition of a mansard storey on this building would create a feature that accords with the prevailing character of terraced housing that dominates Howitt Road and therefore represents an overall enhancement to the character and appearance of the Conservation Area.
4. The application followed two previous pre-application submissions. The first in March 2020 (application reference 2020/1404/PRE) and the second pre-application in October 2020 (application reference 2020/5007/PRE). Whilst the principle of additional development at this site was agreed at an early stage, significant discussions took place with Officers regarding the design of the proposed extension. Details of those discussions are set out in the ‘Relevant Planning History’ section of the supporting letter submitted with the application which is attached at **Appendix 1**.
5. During the first round of pre-application discussions the Conservation Team identified the flat roof as a feature of significance but identified that an alternative roof form could be acceptable, if the detail of the scheme was correct. The local planning authority’s formal response letter, dated 12 May 2020 and attached at **Appendix 2**, specifically states:  
  
*“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.”*
6. As part of the continuing pre application discussions the applicant explored a number of alternative designs for the roof extension, and Officers concluded that the final design, which is the one submitted for planning, had an acceptable relationship with the host building, subject to the finessing of some of the details. The local planning authority’s formal response letter, dated 7 December 2020 and attached at **Appendix 3**, specifically states:

---

# FREETHS

---

*“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”.*

7. The application was therefore submitted on the basis that the design was largely agreed with Officers, including the Conservation Officer who had contributed to the whole pre-application process.
8. Following the submission of the planning application an objection to the proposed development was submitted in November 2021 by the Twentieth Century Society. Specifically, the objection highlights the contribution of the flat roof to the Conservation Area and significance of the building. The objection also identifies the architects of the building as Henry F. Webb and Ash.
9. The Conservation Officer David McKinstry then provided comments (dated January 2021, but assumed to be November 2021) which stated that the proposal would *“create a roof form more akin to the mansards of the earlier Edwardian buildings, but again this would demonstrate neither preservation nor enhancement since the inter-War character of the subject site is made legible by the existing flat roof and this forms part of the historic character of the area, and has done for nearly a century”.*
10. At no point through the pre-application process did Officers set out that the retention of a flat roof was necessary to preserve the character and appearance of the building or Conservation Area. As set out above they specifically identified that it was a key feature but that an alternative roof form could be supported. The design of the mansard roof was one which was encouraged and supported by Officers at the pre-application meeting.
11. The case officer for the planning application contacted Freeths LLP on the 8 December 2021 to identify that Officers were unable to support the submitted scheme. They stated that *“Following the comments from the Twentieth Century Society and the Conservation Officer, further information about the original design of the building has come to light during the course of the application which has led Officers to change their views on the acceptability of extending upwards in the way proposed”*
12. The case officer also identified that *“We would be happy to discuss the potential of extending upwards through another pre-application submission (for which there would be no fee); however, the Conservation Officer feels it would be very difficult to extend the building upwards in such a way that would not impact on the conservation area but would achieve sufficient space to create additional living accommodation”*
13. Freeths LLP requested clarification on the additional information which had come to light during the course of the application which had resulted in a U-turn from the Conservation Officer on the acceptability of the design, and in fact the application proposal as a whole.
14. On the 9<sup>th</sup> December the case officer confirmed that *“we’ve now established who the original architects were likely to be (Henry F. Webb & Ash), a reasonably well-known architectural practice of the time. And the C20th Society, who of course specialise in C20th architecture,*

---

# FREETHS

---

*have resisted the proposals, noting that the flat roof is a key part of its inter-war character and appearance”*

15. As a result of that statement, Cotswold Archaeology have undertaken some further research on the architects, Henry F Webb and Ash, the results of which are set out in the Heritage Technical Note, dated January 2022, which accompanies this submission.
16. That Technical Note identifies that with the exception of one building which holds heritage significance at a national level, which is Elm Park Court a Grade II listed building constructed in 1936, the architect firm was focussed principally on regional level projects within the urban extent of London.
17. The RIBA biography of Henry F Webb records that he designed ‘many large blocks of flats, cinemas and public buildings’ without specifying the names of any of these. There is no mention of Howitt Close.
18. The Heritage Technical Note therefore confirms that Henry F Webb and Ash are not significant or notable architects. As such the retention of the building in the form which they originally designed is not necessary to retain its significance.
19. This accords with the view set out in Cotswold Archaeology’s original Heritage Statement which identifies that the building is an example of 1920’s/30’s architecture but that *“the building is not particularly innovative in its use of materials or its architectural style, thus its aesthetic appeal is primarily derived from its overall form and the use of articulation to create interest”* (para 3.9, Heritage Statement, Cotswold Archaeology, July 2021).
20. The flat roof has, throughout the whole pre-application process, been identified as a key feature of the building. The comments from the Twentieth Century society have not introduced this as a new thought. The naming of the architects practice who designed the building has not revealed any further information regarding the significance of the buildings.
21. Neither the building nor architectural practice which designed the building are of such significance that alterations to the overall appearance of the building would be considered harmful in principle. The building is not listed, either statutorily or locally, and whilst it is identified as contributing positively to the character of the conservation area, there is no reason this cannot continue once additional development has taken place.
22. The flat roof does represent the time in which the building was constructed (inter-war), but this does not accord with the overall character of the Conservation Area, which is Georgian in character. The addition of a further storey to the building will represent the next phase of development for this building.
23. The views of the local planning authority set out in both pre-application letters, that an alternative roof form could be acceptable, should be the starting point for the assessment of this application. No new information has come to light which allows for such a substantial U-turn on the acceptability of the design of the proposal from that which was provided at pre-application stage.
24. The design of the building has responded at all stages to the views of the local planning authority with regards to what would be acceptable. No new information has come to light

---

# FREETHS

---

which should affect those views. We therefore consider that, as per the application submission, the design represents an appropriate response to the host building, providing additional residential accommodation which does not harm the appearance of the Conservation Area.

**26 January 2022**

**Liz Young**  
**Senior Associate**

**Paul Brailsford**  
**Member and National Head of Planning and Environment**