



MAY 2022

# Planning Statement

20 Howitt Road, London NW3 4LL

Iceni Projects Limited on behalf of  
Welby UK Limited

May 2022

ICENI PROJECTS LIMITED  
ON BEHALF OF WELBY UK  
LIMITED

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**Planning Statement**  
20 HOWITT ROAD, LONDON NW3 4LL



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# 1. INTRODUCTION

- 1.1 This Pre-Application Planning Statement is submitted to the London Borough of Camden ('the Council') on behalf of Welby UK Limited ('the Applicant') in support of a full planning application for the amalgamation of two dwellings at 20 Howitt Road, London NW3 4LL along with associated external alterations.
- 1.2 This Planning Statement has been prepared by Icen Projects Ltd and provides the planning case in support of the proposed development. It assesses the development in the context of relevant adopted and emerging planning policy and guidance at national, regional and local levels, together with other material considerations.

## **Pre-Application Discussions**

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- 1.3 The acceptability of the submitted proposals – with the addition of a basement - was tested through pre-application discussions. A copy of the full advice is provided in support of this planning application but in summary the proposed development was considered to be acceptable in principle.
- 1.4 For the purposes of this application the basement has been omitted although it is noted that it was considered acceptable subject to the necessary supporting studies.

## **The Submission**

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- 1.5 The following documents are submitted in support of this planning application:
- This Planning Statement;
  - Existing plans, sections and elevations;
  - Proposed plans, sections and elevations;
  - Pre-Application Advice letter;
  - CIL Form;
  - Appeal Decision APP/X5210/W/20/3244112.

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## 2. THE SITE AND SURROUNDING AREA

- 2.1 The site is located at 20 Howitt Road, Belsize Park, London NW3 4LL. The property is not listed but it is located within the Belsize Park Conservation Area within the administrative boundary of the London Borough of Camden. The extent of the application site is shown on the accompanying Site Location Plan prepared by OpenStudio Architects.
- 2.2 The site currently comprises a terraced 3 storey property with a private rear garden. The property is currently in use as a small HMO on first and second floors (Use Class C4) with a 2 bedroom flat at ground floor level (Use Class C3). There is a small area of existing basement under the front portion of the site.
- 2.3 The site is located towards the northern end of Howitt Road, a primarily residential street to the south of the main centre around Belsize Park.
- 2.4 The site has good public transport links. It is within PTAL 5 and is a 5 minute walk from Belsize Park Underground station to the north, and the many bus routes which run north and south along Haverstock Hill.
- 2.5 There are no statutorily or locally listed buildings in the immediate vicinity of the property, however the site is within the Belsize Park Conservation Area. The site itself, along with the rest of the north side of Howitt Road, is identified within the Belsize Park Conservation Area Statement as a building which makes a positive contribution to the conservation area.
- 2.6 The site is within the Glenloch sub-area of the Conservation Area. This is a distinct area of Edwardian terraced housing developed by the Glenloch Insurance Company close to Belsize Park Underground Station and Haverstock Hill. There is a clear change in character on entering this area from both Belsize Avenue and Belsize Park Gardens from the larger, grander villa development to more modest family housing of a much smaller scale and tighter grain.
- 2.7 The houses along Howitt Road are two storey red brick terraces with a basement and an attic storey within a slate-faced mansard.

### Planning History

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- 2.8 A certificate of lawfulness was granted in 2016 (2016/1810/P) confirming the use of the first and second floors of the property as a 6 room HMO (Use Class C4). A table of other relevant consents in relation to the principles of development are provided at Section 3 of the accompanying Design Statement

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### 3. PLANNING POLICY CONSIDERATIONS

- 3.1 This section assesses the proposed development at the site against the relevant planning policy considerations. The proposed scheme will be progressed under a detailed planning application for full planning permission. The applicant is seeking the amalgamation of the small HMO (Use Class C4) and the existing 2 bedroom flat to deliver a single family dwelling.

#### **Relevant Planning Policy Considerations**

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- 3.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

#### **The Development Plan**

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- 3.3 The statutory development plan for the proposed development consists of
- The London Plan (2021);
  - Camden Local Plan (2017)
- 3.4 Camden also has a number of supplementary Camden Planning Guidance (CPG) documents.
- 3.5 As the site is located within the Belsize Park Conservation Area, the adopted conservation area appraisal and management strategy (2001) is also a material consideration in this instance.
- 3.6 An assessment of the key planning issues in relation to the proposed development against the relevant adopted planning policies is set out below.

#### **Principle of Development**

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##### **Loss of the HMO (Use Class C4)**

- 3.7 The existing HMO falls within Use Class C4 being a small shared unit being occupied by three and six unrelated individuals sharing basic amenities such as a kitchen or bathroom. As such the existing HMO can change to a permanent residential dwelling (Use Class C3) without the need for express consent. As such this proposal is being progressed on the basis that the planning unit on the first and second floor of the property should be treated as Use Class C3 for the purposes of this application.

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### **Amalgamation of Residential Units**

- 3.8 Policy H3 of Camden's Local Plan seeks to protect all housing floorspace where people live long-term. To this end the Council, under policy H3, will resist development that would involve a net loss of residential floorspace, and protect housing from permanent conversion to short-stay accommodation. Furthermore policy H3 seeks to resist development that would involve the net loss of two or more homes unless specific circumstances apply.
- 3.9 The current proposals involve the amalgamation of two units, resulting in the net loss of one unit but not reducing residential floorspace. It is therefore considered that the proposals comply with policy H3 of the Camden Local Plan.

### **Car and Cycle Parking**

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- 3.10 20 Howitt Road does not have any on-site parking spaces and therefore any vehicles associated with the occupants of the building have to utilise on-street parking. At present the property benefits from a minimum of 4 parking permits.
- 3.11 Given that the development would reduce the number of dwellings there would clearly be a net benefit to the demand for parking permits as a result of the proposal, including the associated improvements to air quality, congestion and parking stress which is a significant positive factor.
- 3.12 In reaching this conclusion the appeal decision relating to Flats 1 and 2, 114 Fitzjohn's Avenue, NW3 6NT is referenced (APP/X5210/W/20/3244112). The appeal decision notes, that whilst Policy T2 of the Local Plan and Camden Planning Guidance on Transport (2019) (CPGT) seek car free developments and a reduction in parking provision – including when proposals reduce the number of units on site – the Council did not identify any significant harm which would result should the development not be car-free.
- 3.13 This is the same circumstance as with this planning application, where the number of units is being reduced (one of which is currently a small HMO) and as such a significant reduction in the demand for parking permits. In this respect, and in line with the Inspector's decision, the proposals accord with the overarching aims of the policies which seek to reduce the demand for such facilities to the extent that the benefits associated with the development outweigh any conflict with Policies T2 and DM1 of the Local Plan and the associated CPGT. In this context the proposals also accord with the sustainable transport objectives of the National Planning Policy Framework and the retention of the right to a parking permit is thus considered to fully accord with the Development Plan.

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## **4. CONCLUSIONS**

- 4.1 This planning application has been prepared on behalf of Welby UK Limited to secure consent for the amalgamation of two units to form a single family dwelling. This submission is made following positive pre-application discussions with planning officers at Camden Council.
- 4.2 This Statement provides robust policy support for the principle of the proposed development. The proposed scheme will deliver a sustainable development that complies with the relevant planning policies of the development plans and delivering a number of planning benefits including the provision of a high quality single family dwelling, improvements to the exterior of the property and a reduction in parking demand when compared to existing.



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## A1. APPENDIX NAME

- A1.1 The heading above is “Heading Appendices” Style. Use this for appendices headings. This Style will always start a new appendix on a new page.
- A1.2 This is "Body Text\_Appendices" Style. This Style should be used for all numbered body text within the appendices.
- A1.3 "Body Text\_Appendices" Style will automatically number paragraphs with the relevant appendix number first, e.g. "A1.3" here for appendix one, paragraph three

### Tables within appendices

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- A1.4 Below is a sample table within appendices. Table headings within appendices, using "Heading 5,Table Appendices" Style will be automatically numbered sequentially within each appendix and will include the appendix number, e.g. the table below is "Table A1.1", the first table in appendix one.
- A1.5 The column headings and content of the tables use "Body Text\_for tables" Style.
- A1.6 To insert a pre-formatted table, go to "Insert" tab, click on the "Table" button and click on "Quick Tables". Click on "Iceni\_Table Appendices" to insert.

**Table A1.1      This is “Heading 5,Table Appendices” Style**

Severity	2007-08	2008-09	2009-10	2010-11	2011-12	Total
Slight	2	5	2	2	3	14
Serious	0	1	1	0	0	2
Fatal	0	0	0	0	0	0
Total	2	6	3	2	3	16

Notes: [Insert notes here].