

Delegated Report		Analysis sheet	Expiry Date:	17/11/2021
		N/A / attached	Consultation Expiry Date:	24/10/2021
Officer			Application Number(s)	
Kate Henry			2021/3839/P	
Application Address			Drawing Numbers	
Howitt Close Howitt Road London NW3 4LX			Please refer to draft decision notice	
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature	
Proposal(s)				
Erection of mansard roof extension to create 7 self-contained flats (Class C3)				
Recommendation(s):	Refuse planning permission			
Application Type:	Full Planning Permission			

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice					
Informatives:						
Consultations						
Adjoining Occupiers:	No. notified	00	No. of responses	95	No. of objections	95
Summary of consultation responses:	<p>Site notices were displayed on 29/09/2021 (consultation expiry date 23/10/2021) and a notice was placed in the local press on 30/09/2021 (consultation end date 24/10/2021). The consultation period was later extended to allow local residents additional time to comment.</p> <p>Objections have been received from 95 individuals (36 within Howitt Close; 11 on Howitt Road; 15 on Belsize Park Gardens, including 4 from Manor Mansions; 7 on Belsize Grove, including 6 from Straffan Lodge; 2 from Glenmore Road; 3 from nearby roads, 1 from an address elsewhere in London and 20 unspecified addresses), summarised as follows:</p> <p><u>Heritage and design</u></p> <ul style="list-style-type: none"> • Impact on conservation area (identified as positive contributor). • Impact on 38-44 Belsize Park Gardens – Howitt Close built in original rear gardens of these 4 villas and its height already causes considerable overshadowing. • Existing building does not appear unfinished and is essentially unaltered over the decades since it was built. • Original building was designed to have a flat roof and is a landmark, attractive art deco building. • The only other two buildings worthy of art deco note in the area are the Isokon building and 2 Willow Rd, Hampstead, now run by the National Trust - both have flat roofs. • There are other flat-roofed buildings from similar period in the locality. • A mansard roof is not characteristic of art deco buildings. • Additional height is harmful / mansard roof will ruin the building – top-heavy, bulky, excessively high dormer windows, resultant building will appear cramped in the street scene. • Building originally designed not to dominate Howitt Road. • The existing 3rd floor appears as the ‘top’ and the elegantly detailed, overhanging roofs further reduce the apparent height of the block. • Partial brick façade is sympathetic to the Edwardian houses surrounding it. • Distant views not been considered. • Taking away views of sky. • Where will plant / tank room be re-housed? • Previous application for roof extension refused. <p><u>Impact of additional housing</u></p> <ul style="list-style-type: none"> • Local area already densely populated. • The street does not have the infrastructure to cope with additional housing. • Local roads already congested. • Impact on parking. • Impact on waste and recycling / already inadequate provision for waste storage. 					

Trees and landscaping

- Very tall perimeter planting all around Howitt Close currently successfully screens the building from its close neighbours - the planting will need to be removed to make way for scaffolding.
- Lawn to front of building will be ruined during construction period by erection of welfare buildings.
- Prevents future ability to have a rooftop garden, with its associated biodiversity benefits.
- Impact on trees.

Impact on neighbours

- Impact on neighbouring properties (Howitt Road, Belsize Park Gardens, Belsize Grove, Glenmore Road) – dominant, imposing, loss of privacy, loss of light.
- No daylight / sunlight report.
- Disruption during construction period (many local residents now working at home and the existing building is quiet and peaceful, detrimental impact on wellbeing of existing residents).
- CMP is only in draft form.
- Council fails to consider cumulative impact of approvals at different buildings (32 and 34 Glenilla Road and numbers 53 and 57 Glenmore Rd).
- Additional comings and goings from additional residents.

Housing considerations

- No affordable housing provided.
- 7 flats whereas 14 on other floors – not most efficient layout to provide more housing.
- Benefits of extra housing do not outweigh harm.

Other

- Leaseholder is notoriously dishonest / poor reputation.
- Developer doesn't intend to build out, just wants to increase the value of the building.
- Failure to consult with residents prior to application.
- No benefits to existing residents (e.g. extending leases, abolishing ground rents, improving communal areas, reducing service charges).
- Values of existing flats will decrease.
- Party Wall Act will be breached.
- Rights to light legislation.
- No lift to 3rd floor – will they apply for this later.
- Structurally not possible / fragile rooftop / foundations of building will need strengthening.
- Subsidence at adjacent buildings.

Officer comment

The points relating to heritage and design, the impact of additional housing, trees and landscaping, impact on neighbours and housing considerations will all be considered in the officer's report below.

	<p><i>The comments listed in the 'Other' section above are not relevant planning considerations and cannot therefore be taken into consideration in the determination of the application.</i></p>
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Belsize CAAC

Objection from Belsize Conservation Area Advisory Committee,
summarised as follows:

- Howitt Close is a non-designated asset in the Belsize Conservation Area and makes a contribution to its character and appearance.
- The building has a distinct architectural character and visual appearance which is typical of the Art Deco style of the 1920's and some other developments of this period. It has deep projecting bays and a parapet formed by the flat roof which projects over the elevations. The design, style, use of brick with red brick dressings and the white rendered top floor give it a unified appearance and are consistent with the neighbouring buildings. The white render helps to reduce the scale of the block and leads the eye from the red brick of the Howitt Road housing into the white stucco buildings of Belsize Park Gardens. The elegantly detailed overhanging roofs further reduce the apparent height of the block.
- The building is set within a spacious garden with tall hedges to the boundary which successfully screen it from its neighbours. It is typical of the area, with its variety of front gardens, garden trees, street trees and generous greenery. It is on a prominent corner at the wide junction with Glenilla Road. Its position in Howitt Road reflects the topography, which slopes down from Haverstock Hill to Belsize Park Gardens. In height, bulk and materials it is a pleasing neighbour to the 1890's terraced housing in Howitt Road and Glenilla Road.
- The proposed additional storey with dormer windows would be out of keeping with the date, design and style of the building. It would alter its architectural character by removing the flat roof and its projecting bays, which is a typical and characteristic detail of this style of building. It would be obtrusive and dominate the scale and appearance to the surrounding buildings in Howitt Road and Glenilla Road. The proposals are top heavy, bulky, have excessively high dormer windows and their subdivision and materials are unknown. The application does not include any evidence of where buildings of this type have been extended in a manner that is in keeping with their style, age and design.
- The applicants' Design and Access Statement states that the building "*sits at a low point Additionally, the flat roof contributes to its diminutive form which is visually subservient to the neighbouring terrace houses*". It and the surrounding houses are all three storey. The reason it appears "*diminutive*" is that it has a flat roof and the surrounding houses have pitched roofs. This is no justification for the addition of another storey.
- The four 'villas' in Belsize Park Gardens (38-44) originally sat in a large garden. As a result there are no 'back-to-back' buildings to their rear creating space to the next building (as is common elsewhere with the semi-detached buildings in this conservation area). This series of 'villas' is unique and as such should be acknowledged with their outlook and surroundings protected as part of the conservation area. Howitt Close as it stands fills up the original gardens of the 'villas', sitting tight along the rear garden walls and rising up a full three stories. It already forms a cliff-like wall. Its windows look directly into those of the four 'villas', and its height already causes considerable overshadowing and compromises the open gardens. The additional height would cause even more overlooking and loss of light. It would also significantly diminish long

views from the four 'villas'.

- There is no indication of how the existing plant/tank rooms will be housed, nor is there any information in the application as to whether a double roof will be needed for structural work to strengthen the building (see the 1961 proposal for a roof extension). Both of these may increase the height further and should be considered at this planning stage as they have a physical impact on the proposal. The foundations may also need strengthening, which would require extensive excavation. This would diminish planting in the 'garden' and has not been considered or explained in the application. On the proposed drawings the trees in Howitt Road appear to have been felled to make way for scaffolding and construction access. The building would then become completely exposed to all the neighbours through this erosion of the landscaping. There is no indication that this is being considered or that the trees will be replaced.
- The densities in this particular part of Belsize are exceedingly high, with many existing properties already converted into student/hostel accommodation (two of the four 'villas' adjacent to Howitt Close). The conversion of existing properties increases the strain on amenities (including rubbish collection) and creates clusters of overcrowded transient peoples. The proposal detracts not only living conditions but also the material qualities of this highly valued and acclaimed conservation area. Why add more tiny units here? For the sake of seven small flats (accessed from narrow dark corridors) the whole area will be compromised and visually blighted by this 'ugly' development. The four 'villas' will be significantly devalued by this proposal, with their original character and current qualities compromised.
- The proposal sets a dangerous precedent for unnecessary and inappropriate ad-hoc additions of floors. How many other similar buildings in the Belsize Conservation Area will suffer the same abuse?

Belsize Society

Objection from Belsize Society, summarised as follows:

- The proposal would cause very significant harm to an important building within the Belsize Conservation Area.
- In the Belsize Conservation Area Statement there are a number of highly relevant statements.
- Building is identified as positive contributor – presumption in favour of retention.
- Belsize Conservation Area retains much of its architectural integrity - the majority of the area retains the essence of the character and appearance that would have prevailed in the 1930's.
- Conservation Area Statement says: Roof extensions and alterations, which change the shape and form of the roof, can have a harmful impact on the Conservation Area and are unlikely to be acceptable where:
 - It would be detrimental to the form and character of the existing building
 - The property forms part of a group or terrace which remains largely, but not completely unimpaired
 - The property forms part of a symmetrical composition, the balance of which would be upset
 - The roof is prominent, particularly in long views
- The proposals would be detrimental to the form and character of the existing building, the property forms part of a group or terrace (Howitt Road) which remains largely, but not completely unimpaired, the property forms part of a symmetrical composition, the balance of which would be upset and the roof is prominent, particularly in long views. On this basis Camden should refuse the application.
- The proposal will damage a well-preserved, unique 1930's building of considerable architectural merit and significance.
- The bulking-up of the building by the addition of an extra storey will destroy the architectural integrity of a heritage asset, adversely affect the visual appearance of the neighbourhood and profoundly harm the Conservation Area.
- Howitt Close was very carefully designed in 1932 to suit its specific location and, internally and externally, it remains fundamentally undamaged and unaltered by changes since construction. It has maintained its architectural integrity over the best part of a century and is unspoilt by major additions or changes. After surviving intact the second world war, unlike some Howitt Road properties, and escaping infelicitous developments in the post WWII era, it would be deeply ironic if the building were to be desecrated in the 21st century whilst defined as a building making a positive contribution to the special character and appearance of the Belsize Conservation Area, and apparently subject to the protections of a Conservation Area.
- This L-shaped building was clearly designed to make optimal use of the space available, but without dominating its prominent position at the junction of Howitt Road and Glenilla Road, with Belsize Park Gardens a stone's throw away. Aesthetically it was designed to blend with the earlier Edwardian terraced housing in the neighbouring streets that predated it, whilst proclaiming its era of construction through its overall form and Art Deco flourishes. The proposal to add a fourth level and mansard roof would destroy the proportions of the building and make Howitt Close, at present perfectly adjusted to its vicinity within streets of terraced Edwardian houses, an over-

prominent and jarring presence.

- The Heritage Statement commissioned by the applicant implies that the flat roof of Howitt Close is something of an aberration in Howitt Road but, rather than an aberration, the flat roof should be seen as a conscious choice by the architect to restrict the height of the building.
- At three storeys, Howitt Close is already at the maximum height to blend in aesthetically with the neighbourhood.
- The applicant's Heritage Statement downplays the architectural uniqueness of the building and makes no mention of the excellent state of authenticity and preservation of the building.
- Belsize Society strongly disagrees with the statement in the Heritage Statement that "*the addition of the mansard storey would be considered to represent an overall enhancement to the character and appearance of the Conservation Area*". It considers that the flat roof, coupled with the deep eaves, comprise distinctive and attractive features of Howitt Close.
- The building in its present form is highly valued in the neighbourhood and the addition of a fourth storey and mansard roof would be inflicting substantial harm on a heritage asset.
- Howitt Close is the only mansion block in its immediate vicinity and the extra storey would add bulk to what is now a well-proportioned and not over-dominant building. The closest visible mansion block to Howitt Close is Sussex House, a short distance away on Glenilla Road, which is singled out in the Conservation Area Statement as a negative feature: "*an oppressively large block*" and "*an overbearing flat block significantly larger than the other buildings in the street*". The proposed works would make Howitt Close into an oppressively large block, significantly larger than the other buildings in the street.
- The applicant's Heritage Statement discusses the blocks (Glenloch Court, Wimborne Mansions, Banff House and Moor Court) on the junction of Glenloch and Glenmore Roads, although these are completely out of sight from Howitt Close and its surroundings. These blocks are four storeys high with flat roofs. The implication is that these blocks are classified as "neutral contributors" to the conservation zone as a result of their flat roofs. In reality it is not the lack of a mansard roof that makes these blocks less attractive and emphasises each building's bulk and height but the fact that they are four storeys high and tower above the surrounding terraces - as Howitt Close would do with the addition of a fourth storey. Part of the visual unattractiveness of these blocks in their context is because they are disproportionately tall for the width of the streets in which they are located. An extra storey on Howitt Close would have a similar effect at the bottom of Howitt Road: the block would loom above the street making it over-dominant in contrast to its current harmonious presence.
- The applicant's Heritage Statement attempts to downplay the impact of the additional storey on the views towards Howitt Close from the north-east, south and north-west but it does not make it clear that there will be an adverse effect on these views. Howitt Close is already visible for the length of Glenilla Road as far as Belsize Avenue but in its present form it could be taken at a distance for a terrace of houses. It fits perfectly in its setting at present, the height and width of an extra storey would make it over-dominant.
- The applicant's Heritage Statement refers to the "*utilitarian style of the western elevation*" but this is highly subjective and unjustified. This façade is entirely in harmony with the rest of the building and its

slightly simpler design complements the glimpse of the front and view of the eastern wing, which can be seen simultaneously from the north-western approach. Again from the north-east Howitt Close can be seen from a considerable distance up Howitt Road but, as from the north-west approach along Glenilla Road, it could be a view of terraced houses until one approaches fairly close to the mansion block. From Belsize Park Gardens and the southern approach along Glenilla Road, Howitt Close is already a significant presence and an additional storey would harm the streetscape along this stretch of the road.

- The statement in the application '*the existing eaves present an almost unfinished appearance*' is meaningless given that the building was completed in the 1930's by a highly regarded architect who clearly intended the building to appear as it still does, a beautifully designed block which makes a very positive contribution to the Conservation Area.
- Belsize Society notes that the applicant has refined its proposal on three occasions to try to make it less obtrusive. It is clear from the illustrations in the application that it is impossible to make a proposal of this kind acceptable in design terms, the proposed dormers and vast extent of tiling ruin the subtle gentle appearance of the existing building design.
- Historical significance - Howitt Close was constructed between 1932 and 1934. A 'Notice of new buildings, drainage works, and apparatus in connection therewith' dated 27 October 1932 was filed with the Borough of Hampstead. This Notice was signed by Henry F Webb & Ash and the same business is shown as the owner of the site/building. Howitt Close first appears in the General Rate book for Belsize Ward made 6 April 1934, which shows that the 46 flats in the building were fully occupied by tenants as at March 1934, by which time the building was owned by London Mayfair & District Properties Ltd.
- The applicant's Heritage Statement incorrectly dates the property ("*represents a 1920s addition, "constructed in a single phase, between 1920 and 1935" and "possibly indicates that the building was constructed in the early 1920s"*") and, as such, the statement cannot interpret correctly either the individual significance of the building or its importance within its historical context.
- A construction date between 1932 and 1934 means that Howitt Close was contemporaneous with the (Grade I listed) Isokon flats, located less than half a mile away on the east side of Haverstock Hill. The design of the Isokon flats was developed 1929-1932 and they were officially opened in July 1934, shortly after Howitt Close was first occupied. A huge amount has been written about the Isokon building – a project "*to design an apartment building and its interior based on the principle of affordable, communal and well-designed inner-city living... But it was not a working class building – it was aimed at intellectual, working middle class people.*" The Howitt Close flats were also intended to provide compact living spaces for the middle classes. The original plans for the building were titled 'Proposed Block of Small Type Flats.' Howitt Close had a restaurant from the very beginning in the lower ground floor, with 'Ash & Fitch' (presumably the caterers) occupying the restaurant and associated accommodation at April 1934. The famous Isobar restaurant in the Isokon building was not opened until 1937, when the communal kitchen in the block was converted into a restaurant. The impetus

behind Howitt Close was similar to that of the Isokon building and, with its contrasting architectural style, it provides context for a modernist building like the Isokon flats. Without good comparable examples like Howitt Close, which remains very close to its 1930s state, the significance of the Isokon flats is diminished.

- It is notable that the business 'Henry F Webb & Ash' was the original owner and developer of Howitt Close. There can be no doubt that the Henry F Webb concerned was the architect Henry Frederick Webb (1879-1953) who designed Elm Park Court, Pinner, constructed in 1936 and now Grade II listed. Elm Park Court is considered one of the icons of the form of modernism which took hold in 'Metro-land' in the 1930s, a form of modernism which owes more to Art Deco than to the later 'brutalist' strand of modernism. Whilst the green and white colour-scheme of Elm Park Court gives it a very distinctive character, its Art Deco heritage is apparent and the development has a number of features in common with Howitt Close. Over and above its intrinsic architectural merit, Howitt Close is significant as another building designed by HF Webb, an architect important to north-west London as the designer of the iconic Grade II-listed Elm Park Court.
- In contrast to the well-publicised and dramatic history of the Isokon Building with its celebrity tenants – "*Very few pre 1945 tenants do not have a Wikipedia entry*" - Howitt Close has had a quiet history, and remarkably little has been written about it. It is understood that it was used as residential accommodation for civil servants at some point and further research could reveal an interesting story of an early example of inner city, partly communal living for the middle classes. In contrast to the Isokon Building, which fell into an appalling state of disrepair under Camden Council's ownership and required total refurbishment, Howitt Close has remained in a reasonable state of repair over the past 90 years, partly because it lacks some of the structural design faults which contributed to the Isokon's deterioration. Howitt Close, as a pleasing and highly suitable presence in its location, has been taken for granted over the best part of a century, at least until the threat to the architectural integrity of the building posed by the current planning proposal. It forms a highly valued and important part of the Belsize Conservation Area and should not be altered as proposed. Belsize Society believes that it is only a matter of time before Howitt Close becomes highly valued and rightly appreciated for its distinctive architecture and its well-preserved authenticity, leading to listed status – unless, that is, the current planning proposal succeeds in desecrating the building before then. It is vital that the building is preserved unviolated for posterity.
- It would be a breach of the terms and principles of the Belsize Conservation Area if a unique, extremely well-preserved architectural gem like Howitt Close is wantonly desecrated for the sake of a few additional flats.

Twentieth Century Society

Objection from Twentieth Century Society, summarised as follows:

- Howitt Close is an interwar T-shaped block of flats, located on a corner site where Howitt Road meets Glenilla Road in Belsize Park. Glenloch, Glenmore, Glenilla and Howitt roads were created in the early 20th-century on the site of a large 1860s house called The Woodlands. The Belsize Conservation Area Statement (2003) describes the 'Glenloch Area' as a "*distinctive area of Edwardian terraced housing developed by the Glenloch Insurance Company close to Belsize Park Underground Station [opened 1907] and Haverstock Hill*" (p.25).
- British History Online (BNO) expands on this, outlining its development in the interwar period: "*Glenloch Investment Co. was responsible for the Woodlands estate, where houses were still being built in Glenilla Road in 1923-4 and blocks of flats were put up, Glenloch Court in 1927 and Banff House and Howitt Court in 1932.*" This is almost certainly Howitt Close which was built on the site of the Woodlands estate between the Ordnance Survey (OS) map was published in 1920 and revised in 1935. A 1932 archive document relating to the building includes the name of the architect's practice, Henry F. Webb & Ash. Howitt Close is a 3-storey, brown brick building with distinctive stepped bays, red brick dressings, rendered upper storey and flat roof with projecting eaves. Its entrance bay features a porch with paired columns and decorative iron balcony, and period lettering reads 'Howitt Close'.
- The 1920s and 30s saw the construction of more blocks of flats nearby, including Gilling Court (1932) and Holmfield Court (1933) on Belsize Grove built by the Bell Properties Trust, and Hillfield Estates' Hillfield Court and Mansions (1934) fronting Haverstock Hill and Tudor Close (1935) behind, all of which are included within the boundaries of the Belsize Conservation Area.
- Howitt Close is a good example of an interwar block of flats and is clearly of architectural merit. The Belsize Conservation Area Statement (2003) identifies Howitt Close as a building which makes a positive contribution to the character and appearance of the conservation area (p.30).
- On 'Roof Extensions', the Belsize Conservation Area Statement states that "*Roof extensions and alterations, which change the shape and form of the roof, can have a harmful impact on the Conservation Area*". Such extensions "*are unlikely to be acceptable where: It would be detrimental to the form and character of the existing building*" (p.41). We agree with the Belsize Conservation Area Advisory Committee (BCAAC) who have objected to the proposed extension on the grounds that it "*would be out of keeping with the date, design and style of the building*" and would be 'obtrusive' and dominant.
- The applicant claims that the flat roof is "*uncommon within the Conservation Area sub-area and does not contribute positively to the character and appearance of the area*" (Heritage Statement, p.3). We believe the building's flat roof is a key part of its interwar character and appearance, and distinguishes it from neighbouring buildings in a way that contributes to the variety and interest of the sub-area. The proposed mansard roof will harm the building's architectural interest and uniqueness.
- Object due to the harm caused to a non-designated heritage asset and to the character of the conservation area.

Site Description

Howitt Close is a 3 storey, L-shaped, purpose-built block of flats dating from the 1930's at the southern end of Howitt Road, adjacent to the junction with Glenilla Road. It is constructed with brown bricks with a white rendered third (top) floor and red brick detailing around the windows. It features stepped bays and a flat roof with overhanging eaves. The main entrance, at the centre of the L-shape, features paired columns and a decorative iron balcony above, with the name of the building above at third floor level.

The application site is within the Belsize Conservation Area and the building is identified within the Belsize Conservation Area Statement (2003) as making a positive contribution to the character and appearance of the area.

The surrounding area is residential in character, predominantly featuring Edwardian semi-detached and terraced housing on Howitt Road, Glenmore Road and Glenilla Road; and larger paired Victorian villas and purpose-built flats (e.g. Manor Mansions) on Belsize Park Gardens. Howitt Road slopes down from Haverstock Hill such that Howitt Close is at the bottom of the slope and appears a similar height to the neighbouring two storey buildings.

Relevant History

TP948/12543: The construction of an additional floor at third floor level containing fourteen self-contained flats. **Refused 29/06/1961.**

Reasons for refusal:

- 1. The proposal would not accord with the provisions of the Administrative County of London Development Plan as regards density or persons per acre, the density as proposed being considerably in excess of that provided for in this area.*
- 2. The proposal would not comply with the Council's daylighting standards next the south-eastern and south-western boundaries of the site and would have the effect of preventing the access of adequate light across these boundaries to the detriment of adjoining land.*
- 3. The proposal would result in overdevelopment of the site.*
- 4. Owing to the lack of car parking facilities to the existing building, the proposed addition would further aggravate the parking position.*

TP948/70566: The erection of a steel flue pipe at the rear of the premises known as Howitt Close, Howitt Road, Hampstead, and the retention of the structure for the period allowed under the London Building Act, 1930. **Granted 07/07/1937.**

Relevant policies

National Planning Policy Framework (2021)

London Plan (2021)

Camden Local Plan (2017)

G1 Delivery and location of growth

H1 Maximising housing supply

H4 Maximising the supply of affordable housing

H6 Housing choice and mix

H7 Large and small homes

C5 Safety and security

C6 Access for all

A1 Managing the impact of development

A2 Open space

A3 Biodiversity

A4 Noise and vibration
D1 Design
D2 Heritage
CC1 Climate change mitigation
CC2 Adapting to climate change
CC3 Water and flooding
CC4 Air quality
CC5 Waste
T1 Prioritising walking, cycling and public transport
T2 Parking and car-free development
T3 Transport infrastructure
T4 Sustainable movement of goods and materials
DM1 Delivery and monitoring

Camden Planning Guidance

Access for All (2019)
Air Quality (2021)
Amenity (2021)
Biodiversity (2018)
Design (2021)
Developer Contributions (2019)
Energy efficiency and adaptation (2021)
Housing (2021)
Public open space (2021)
Transport (2021)
Trees (2019)
Water and flooding (2019)

Belsize Conservation Area Statement (2003)

Assessment

1. The proposal

1.1. Planning permission is sought for the following:

- Mansard roof extension to create 7 flats

1.2. The proposed mansard roof would measure 3.3 metres tall and would be constructed with red clay roof tiles. The dormers would be constructed with standing seam zinc panels and the windows within would be steel double glazed windows, coloured grey.

1.3. The proposed dwelling mix is as follows:

Flat 1	2-bed-4-person
Flat 2	2-bed-3-person
Flat 3	2-bed-3-person
Flat 4	1-bed-2-person
Flat 5	3-bed-4-person
Flat 6	2-bed-3-person
Flat 7	2-bed-4-person

1.4. A new bin store and bike store (16 spaces) would be provided to the west of the building, accessed from Glenilla Road.

2. Planning considerations

2.1. The key considerations material to the determination of this application are as follows:

- The principle of development / land use
- Housing (including affordable housing, dwelling mix, quality of living accommodation)
- Heritage and design
- Trees and landscaping
- Biodiversity
- Impact on neighbours
- Transport considerations
- Energy and sustainability

3. The principle of development / land use

3.1. Policy G1 of the Local Plan promotes the most efficient use of land in the borough and housing is regarded as the priority land use of the Local Plan. As such, the creation of 7 additional housing units is welcomed.

3.2. An application for a roof extension at the building was refused in 1961 (application reference TP948/12543, dated 29/06/1961 - see Planning History above) for reasons including density, daylight impacts, overdevelopment and lack of car parking facilities. Planning policy has changed considerably in the intervening decades and therefore this application must be assessed on its merits and against current policy. The principle of development is considered to be acceptable, subject to the detailed considerations below.

4. Housing

Affordable housing contribution

4.1. Policy H4 expects a contribution to affordable housing from all developments that provide 1 or more additional homes and involve a total addition to residential floorspace of 100 sqm GIA or more.

4.2. The proposed development involves the creation of 7 additional homes and a total addition to residential floorspace of 616 sqm.

4.3. Targets are based on an assessment of development capacity whereby 100 sqm GIA of housing floorspace is generally considered to create capacity for one home and a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% for each home added to capacity. In this case the target is 12%.

4.4. Where development has the capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing. A rate of £5000 per sqm GIA is applied. On this basis the contribution would be as follows:

$$[\text{Additional residential floorspace (GIA)} \times 12\%] \times \text{£}5000$$

$$[616 \times 12\% = 73.92] \times \text{£}5000 = \text{£}369,600$$

4.5. If the application were otherwise considered to be acceptable, the financial contribution would be secured by section 106 legal agreement. The lack of an agreement to secure the affordable housing contribution forms a reason for refusal.

Dwelling mix

- 4.6. Policy H7 of the Local Plan aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. The policy requires that all housing development, including conversion of existing homes and non-residential properties, contributes to meeting the priorities set out in the Dwelling Size Priorities Table (DSPT); and includes a mix of large and small homes. The policy then goes on to note that the Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development.
- 4.7. The proposed development provides 5x 2-bed units, 1x 1-bed unit and 1x 3-bed unit and therefore meets the aims of the DSPT insofar as 2-bed market units have high priority and the proposal provides a mix of large and small homes. The proposal is therefore considered to be acceptable in this respect.
- 4.8. A comment has been made that the proposal does not provide the most efficient layout for providing new housing (i.e. more could be provided with an altered layout). However, officers consider that a good mix of dwelling sizes has been achieved. It is worth noting that flats on the lower floors fail to meet modern day space standards and so there is no option to copy the floorplan from lower floors.

Living standards for future occupiers

- 4.9. Policy D1 of the Local Plan seeks to secure high quality design in development, including a high standard of living accommodation [clause (n)]. The supporting text to the policy notes that all residential developments should be designed and built to create high quality homes. The Council will seek to ensure that residential development (both new build and change of use) is self-contained with its own secure private entrance; has good ceiling heights and room sizes; is dual aspect except in exceptional circumstances; has good natural light and ventilation; has good insulation from noise and vibration; has a permanent partition between eating and sleeping areas (studio flats are acceptable where they provide adequate space to separate activities); incorporates adequate storage space; incorporates outdoor amenity space including balconies or terraces; and is accessible and adaptable for a range of occupiers. The supporting text also notes that new dwellings and conversions to residential use will be expected to meet the Government's nationally described space standard.
- 4.10. The proposal would provide the following:

Unit	Dwelling type	Floorspace (sqm)	Required standard (sqm)
Flat 1	2-bed-4-person	75	70
Flat 2	2-bed-3-person	77	61
Flat 3	2-bed-3-person	69	61
Flat 4	1-bed-2-person	57	50
Flat 5	3-bed-4-person	78	74
Flat 6	2-bed-3-person	71	61
Flat 7	2-bed-4-person	70	70

- 4.11. The Government's nationally described space standards are set out in the final column of the table above. All of the units would exceed the required space standards, which is

welcomed.

- 4.12. All of the proposed new units would be self-contained with their own secure private entrances. The new units would be accessed via the main entrance to the host building and via the existing communal staircases which would be extended upwards to the new fourth floor.
- 4.13. The new units would have good ceiling heights (between 2.3 and 2.5 metres) and room sizes and all would have good layouts, including a permanent partition between eating and sleeping areas and the incorporation of adequate storage space, which is welcomed.
- 4.14. Flats 3 and 4 would be single aspect. Flat 3 would face to the front (north) of the building and Flat 4 would face to the rear (south). On the basis that it is difficult to avoid single aspect units due to the floorplan (which is being extended upwards) and taking into consideration the fact there are numerous other single aspect units within the same building, this is considered to be acceptable. Flat 3, which is a 2-bed unit, would have pleasant views to the front of the building and along Howitt Road and Flat 4, the 1-bed unit, would have views towards to the rear of properties on Belsize Park Gardens. Whilst the views from Flat 4 may not be as pleasant as views along the road, this unit does at least benefit from being south-facing and it should therefore receive good natural light.
- 4.15. The other new units would mostly have good natural light and ventilation. Flat 3, the north-facing, single-aspect flat, may suffer from a lack of natural daylight; however, its elevated position should at least prevent overshadowing from neighbouring buildings. Both Flats 3 and 4 (the 2 single-aspect units) benefit from a number of windows serving different rooms, to aid with natural ventilation throughout the units.
- 4.16. The proposed layout is considered to be suitable to prevent noise transfer between units. If the application was otherwise considered to be acceptable a suitable planning condition could require the submission of details of adequate noise insulation between the separate dwellings.
- 4.17. None of the units would have access to private outdoor amenity space; however, this can be said of the existing units in the host building and the application site is within walking distance of Hampstead Heath and Primrose Hill. There is also a small amount of communal open space surrounding the host building.
- 4.18. A comment has been made about the provision of adequate waste storage to serve the new dwellings. A bin store would be provided adjacent to the bike store, accessed from Glenilla Road. If the application was otherwise considered to be acceptable, final details of waste storage could be agreed by condition.
- 4.19. Overall, the proposals are considered to be acceptable in this respect.

5. Heritage and design

- 5.1. The application site is within the Belsize Conservation Area, wherein the Council has a statutory duty, under section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended), to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. The Belsize Conservation Area Statement (BCAS) (2003) identifies Howitt Close as making a positive contribution to the character and appearance of the conservation area.
- 5.2. Policy D1 of the Camden Local Plan seeks to secure high quality design in development which respects local context and character; preserves or enhances the historic environment and heritage assets in accordance with Policy D2 (Heritage); and comprises details and materials that are of high quality and complement the local character. Policy D2 seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets, including

conservation areas. The policy notes that, in order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

- 5.3. Paragraph 199 of the National Planning Policy Framework (NPPF) guides that: "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance*". Paragraph 202 then guides that: "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*".
- 5.4. The application site is within sub-area 4 ('Glenloch') of the conservation area. The BCAS notes that this is a distinctive area of Edwardian terraced housing developed by the Glenloch Insurance Company close to Belsize Park Underground Station and Haverstock Hill. Generally, the houses in the area are smaller in scale and there is a tighter grain than elsewhere in the conservation area, where larger, grander, villa development is more common. No specific reference is made to Howitt Close in the Conservation Area Statement, other than the fact it is listed as a positive contributor. This is not to say that the building is not a significant building within the conservation area.
- 5.5. With regards to significance, whilst the majority of buildings in the immediate vicinity are terraced Edwardian houses and semi-detached Victorian villas, Howitt Close is distinctive as a piece of post-1918 development. Its scale and materials respect the general character of its neighbours in terms of the façade, but the form of the building reflects its inter-war construction. It appears to have been developed in the early 1930's (certainly prior to 1934 when an application was submitted for alterations to a flue) and seems to have been designed by the firm of Henry F. Webb and Ash. Although different in form from the terraces in Howitt Road, Howitt Close is not an anomaly within the wider Belsize Conservation Area. The Glenloch Investment Company which erected Howitt Close was also responsible for erecting Glenloch Court and Banff House on Glenmore Road around the same time, both of which also have flat roofs. Sussex House, on Glenilla Road, is another example of a flat-roofed housing block. Flat roofed inter-war blocks of flats are therefore part of the prevailing character of this part of the conservation area.
- 5.6. The existing building (which has a distinct architectural character and has remained largely unaltered since it was first built) was originally designed with two brick storeys below a white rendered third storey and a flat roof with overhanging eaves. The two-plus-one composition, with the pale storey above a darker mass below, along with the local topography whereby the land slopes down Howitt Road towards the application site, means that although the application building is a storey taller than its closest neighbours, it does not appear overly bulky or prominent in the street scene. In addition, the building has a domestic scale akin to that of the neighbouring buildings through the use of set-backs and stepped bays to break up the overall mass into smaller sections that are roughly the same width as the plots on the street. The use of red brick and render further give the building a domestic feel and help the building respect its local context.
- 5.7. The applicant's Heritage Statement acknowledges that the existing building "*sits comfortably within its position*" (para 3.16) and "*the flat roof of the building contributes to its diminutive form which is visually subservient to neighbouring terraced houses, despite its greater overall size*" (para 3.16). However, the statement then goes on to suggest that, particularly when viewed from the west, the building has an "*unfinished appearance*" due to the lack of a pitched or mansard roof (para 3.17).
- 5.8. Officers disagree that the existing building appears in any way unfinished. As noted above, the

building was designed by a firm of architects and the flat roof was a conscious choice, most likely in order to reduce the building's prominence amongst the older properties in the vicinity¹. As noted at pre-application stage, officers consider the existing building to be a "*complete composition of considerable charm which through good design suits its context well*". On this basis, and as explained to the applicant at pre-application stage, officers consider that it will be very challenging, though not necessarily impossible, to extend the building upwards without causing harm both to the character and appearance of the host building itself and also the wider area, including the Belsize Conservation Area.

5.9. The BCAS sets out guidelines for future development within the conservation area. With regards to roof extensions, Guideline BE26 states: "*Roof extensions and alterations, which change the shape and form of the roof, can have a harmful impact on the Conservation Area and are unlikely to be acceptable where:*

- *It would be detrimental to the form and character of the existing building*
- *The property forms part of a group or terrace which remains largely, but not completely unimpaired*
- *The property forms part of a symmetrical composition, the balance of which would be upset*
- *The roof is prominent, particularly in long views*" (page 41)

5.10. Furthermore, Guideline BE16 highlights that the choice of materials is important and Guideline BE18 notes that original brickwork should not be painted, rendered or clad unless this was the original treatment (page 40).

5.11. Contrary to Guideline BE26, the proposed mansard roof extension, by reason of its bulk and massing, would change the shape and form of the existing roof significantly as the roof is prominent, particularly in long range views along Howitt Road and from the junction with Glenilla Road. Furthermore, contrary to Guideline BE16, the choice of materials is not considered to be appropriate to the host building. As noted above, the existing building features two brown brick storeys below a white rendered third floor. The introduction of clay tiles above the rendered third, 'top' floor is not considered to be appropriate to the style or historical development of the host building.

5.12. As noted above, there is a statutory obligation to demonstrate that the proposed works would preserve or enhance the character or appearance of the conservation area. The works would not preserve the character and appearance of the area because there is a perceptible change. As such, this assessment must consider whether the proposals would enhance the character and appearance of the conservation area.

5.13. Whilst there is no policy which prohibits roof extensions in principle, officers do not consider that the proposed mansard roof would enhance the character and appearance of the conservation area. This is because the proposed design of the mansard has not been properly reconciled with the scale, proportions and original design of the host building. The proposed mansard roof is considered to be overly tall and top-heavy; many of the dormers equal, and in some cases exceed, the width of the principal windows on the façade below, resulting in further disruption to the architectural cohesion of the building.

5.14. The proposed mansard has been presented as making the building more contextual to its neighbours; however, it is unclear why this would be seen as a benefit as the application building would be more prominent than currently and the existing flat roof is characteristic of inter-war development and therefore aids in the legibility of the application building. Furthermore, the existing building has remained largely unaltered since its initial construction

¹ A number of consultation responses have suggested that Howitt Close was built within the original rear gardens of properties on Belsize Park Gardens; however, historical maps don't appear to demonstrate this. It appears that the plot of land went from being a field to being a vacant site.

and therefore the flat roof forms part of the established character of the streetscene and local area. In essence, the proposals neither repair nor restore any previous historical condition, nor do they help better reveal or enhance the existing historic or architectural character of the area. As such, officers do not consider that the proposed works would enhance the character and appearance of the streetscene or Belsize Conservation Area.

- 5.15. The proposals are considered to cause 'less than substantial' harm to the character and appearance of the Belsize Conservation Area and the Council considers that the public benefits of the scheme (i.e. the provision of additional permanent, self-contained housing in the borough and the financial contribution to affordable housing) would not outweigh the harm that would be caused. The application is recommended for refusal on this basis

6. Trees and landscaping

6.1. Policy D1 of the Local Plan seeks development which incorporates high quality landscape design and maximises opportunities for greening, for example through planting of trees and other soft landscaping. Policy A3 of the Local Plan seeks to protect and secure additional trees and vegetation. The policy notes that the Council will resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation. The Council will also require trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development.

6.2. The proposed development does not involve the loss of any trees from the site; however, concerns have been raised about the impact on vegetation around the edge of the building and the grassed areas to the front during the construction period as scaffolding will be required and the draft Construction Management Plan indicates the use of the area at the front for a 2 storey welfare cabin.

6.3. If the application was otherwise considered to be acceptable, a planning condition could require the submission of details of tree protection methods during the construction period. With regards to damage caused to the area at the front of the building, it would be in the interests of the building's management company to restore the site to its former condition following the completion of the works, particularly if they are looking to sell the new flats. Furthermore, if the site was not tidied up following the works, the Council could choose to serve a Section 215 notice if it felt that the site was having an adverse impact on the character and appearance of the area.

6.4. Overall, the proposals are considered to be acceptable in this respect.

7. Biodiversity

7.1. Policy A3 of the Local Plan also aims to support the London Biodiversity Strategy and the Camden Biodiversity Action Plan (BAP) by ensuring that Camden's growth is accompanied by a significant enhancement in the borough's biodiversity. The policy notes that the Council will assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed.

7.2. A comment has been made that the proposed development prevents any future application to use the roof as a roof terrace being submitted; however, each application must be assessed on its own merits.

7.3. If the application was otherwise considered to be acceptable, a planning condition could require the provision of bird and bat boxes at the site as part of the development. A mansard roof extension is not considered to be suitable to incorporate a green wall and/or roof.

8. Impact on neighbours

- 8.1. Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The policy notes that the factors to consider include: visual privacy and outlook; sunlight, daylight and overshadowing; artificial lighting levels; impacts of the construction phase; and noise and vibration. Policy A4 also seeks to ensure that noise and vibration is controlled and managed.
- 8.2. The main properties that are likely to be affected by the proposals are the properties in the existing building (Howitt Close), and neighbouring properties on Howitt Road, Glenilla Road, Belsize Park Gardens and Belsize Grove.
- 8.3. It is not considered that the proposed development would give rise to unacceptable levels of overlooking to neighbouring properties. The existing flats within the building already have views to the neighbouring properties on Howitt Road, Belsize Park Gardens and Belsize Grove and, whilst the additional floor level may impact on perceived levels of overlooking from the building to its neighbours, the separation distances roughly comply with or exceed those outlined in CPG Amenity (i.e. > 18 metres). The separation distance between the host building and the buildings to the south on Belsize Park Gardens is approximately 19 metres; the separation distance between the host building and Straffan Lodge (on Belsize Grove) is in excess of 30 metres; and although the properties on the opposite side of Howitt Rose (to the north / north-west) are only a minimum of 17 metres away, this is considered to be acceptable as a similar relationship exists between the front-facing elevations of other properties in the street.
- 8.4. It is not considered that the proposed roof extension would impact harmfully on the outlook from neighbouring properties. This is due to the fact it is only single storey in height and due to the separation distances outlined above.
- 8.5. It is not considered that the proposed works would cause significant loss of sunlight or daylight or overshadowing to neighbouring properties. This is on the basis that the building is only being extended up by one storey and taking into consideration the orientation of the building, the separation distances to neighbouring buildings and the path of the sun. There may be some impact to No. 57 Howitt Road as it is located directly to the north of the application building; however, the rear of this building would still continue to receive sunlight in the morning and it is already likely to be overshadowed in the afternoon as a result of both the application building and No. 57 itself.
- 8.6. It is not considered that the proposed development would cause undue harm as a result of artificial lighting. If the application was otherwise considered to be acceptable a planning condition could require the submission of details of any external lighting proposed.
- 8.7. It is not considered that the proposal would cause undue harm in terms of noise or general comings and goings. The number of residential units in the building is increasing by 7, which is not significant. Any noise associated with the additional dwellings is likely to be considered acceptable in this built-up residential area.
- 8.8. There is likely to be some impact during the construction period. A draft Construction Management Plan (CMP) has been submitted with the application. If the application was otherwise considered to be acceptable, a final Construction Management Plan (including implementation support fee) and Construction Impact Bond would be secured by section 106 legal agreement, to help mitigate the impact on local residents. The lack of a section 106 agreement to secure this forms a reason for refusal.

9. Transport considerations

- 9.1. The application site has a PTAL rating of 3 (average) and is within a Controlled Parking Zone (CA-B Belsize: Mon-Fri 0900-1830; Sat 0930-1330; Sun n/a).

Cycle parking

9.2. Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. For this proposal, the London Plan requires 2 spaces per dwelling and an additional 2 visitor spaces (14 + 2 = 16). The plans indicate proposed cycle storage adjacent to Glenilla Road; however, no further details have been provided. If the application was otherwise considered to be acceptable the final details could be secured by condition.

Car free

9.3. Policy T2 of the Local Plan seeks to limit the availability of parking and requires all new developments in the borough, including redevelopments (and changes of use) with new occupiers, and including where dwellings are created as part of an amalgamation or subdivision, to be car-free (i.e. future occupiers would not be able to apply for parking permits for the local area). If the application was otherwise considered to be acceptable, the new dwellings would be secured as car-free through a section 106 legal agreement. The lack of a section 106 agreement to secure this forms a reason for refusal.

Construction impact

9.4. Policy T4 of the Local Plan promotes the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road. As noted above, a draft CMP has been submitted with the application, which the Council's Transport Officer is satisfied with. If the application was otherwise considered to be acceptable a final Construction Management Plan (including implementation support fee) and Construction Impact Bond would be secured by section 106 legal agreement, to mitigate the impact on the local highway. The lack of a section 106 agreement to secure this forms a reason for refusal.

10. Energy and sustainability

10.1. Policy CC1 of the Local Plan requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. The policy promotes zero carbon development and requires all development to reduce carbon dioxide through following the steps in the energy hierarchy; and expects all developments to optimise resource efficiency.

10.2. Policy CC2 requires development to be resilient to climate change by adopting climate change adaptation measures, for example not increasing and wherever possible reducing surface water run-off through increasing permeable surfaces and use of Sustainable Drainage Systems; incorporating bio-diverse roofs, combination of green and blue roofs and green walls where appropriate; and measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy. The policy also notes that the Council will promote and measure sustainable design and construction and will expect new build residential development to use the Home Quality Mark and Passivhaus design standards.

10.3. An Energy and Sustainability Statement has been submitted with the application. It notes that the proposed development would incorporate a range of passive and active energy efficient measures, exceeding current Building Regulations 2010, Part L (2013 edition with 2016 amendments) requirements for the levels of insulation and air tightness, the installation of high-performance glazing, heat recovery ventilation, waste water heat recovery and energy efficient lighting. The implementation of such measures would reduce CO2 emissions by 4.59%.

10.4. The statement also notes that the development would achieve a 20% CO2 reduction against Part L (2013 Building Regulations) from on-site renewables (after all other energy efficiency measures have been incorporated) by incorporating photovoltaics (PV) into the

design. The PV panels would reduce CO2 emissions by a further 25.21% giving an overall CO2 emission reduction of 28.64%. Notwithstanding the claims in the Energy and Sustainability Statement, the proposed drawings do not illustrate solar PV panels and therefore these have not been assessed from a heritage and design point of view. On this basis, the applicant has failed to adequately demonstrate that the proposed development would minimise the effects of climate change or meet the highest feasible environmental standards and the application is recommended for refusal partly on this basis.

10.5. The statement also notes that the development would achieve a maximum internal water use of 105 litres per day per person. If the application was otherwise considered to be acceptable, this could be secured by condition.

Recommendation: Refuse planning permission for the following reasons-

1. The proposed roof extension, by reason of its detailed design, bulk, massing, height, materials and undue prominence, would compromise the form, character and appearance of the host building and would thus harm the character and appearance of the streetscene and Belsize Conservation Area, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.
2. In the absence of detailed drawings of the proposed solar PV panels, it has not been adequately demonstrated that the proposed development would minimise the effects of climate change or meet the highest feasible environmental standards, contrary to policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.
3. The proposed development, in the absence of a legal agreement to secure a contribution to affordable housing, would fail to maximise the contribution of the site to the supply of affordable housing in the borough, contrary to policies H4 (Maximising the supply of affordable housing) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.
4. The proposed development, in the absence of a legal agreement securing a Construction Management Plan, implementation support fee and Construction Impact Bond, would be likely to give rise to conflicts with other road users and be detrimental to the amenity of the area generally, contrary to policies A1 (Managing the impact of development), T4 (Sustainable movement of goods and materials) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.
5. The proposed development, in the absence of a legal agreement to secure the new dwellings as "car-free", would be likely to contribute unacceptably to parking stress and congestion in the surrounding area, contrary to policies T2 (Parking and car-free development) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.