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# FREETHS

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16 August 2022

Our Ref: 2168538/1/LXY/1683

By Email [planning@camden.gov.uk](mailto:planning@camden.gov.uk)

Dear Sirs,

**RE: HOWITT CLOSE - HOWITT ROAD, BELSIZE PARK, LONDON, NW3 4LX**  
**REVISED APPLICATION FOR PLANNING PERMISSION FOR ROOFTOP EXTENSION FOR 7**  
**DWELLINGS**

Freeths LLP are instructed by our client, Daejan Properties Limited ("DPL") to re-submit an application for a rooftop extension to create 7 residential dwellings at Howitt Close, Howitt Road, Belsize Park, London, NW3 4LX ("the site").

The application submission is supported by the following documents which accompany this covering letter:

1. Design and Access Statement
2. Design and Access Statement Addendum
3. Heritage Statement
4. Heritage Technical Note
5. Heritage Statement Addendum
6. Construction Management Plan (including Air Quality Management Plan)
7. Energy and Sustainability report
8. CIL Liability Form

The supporting plans are as follows:

1. D-003 – Existing Site Plan
2. D-004 - Existing Roof Plan
3. D-005 – Existing Front Elevations
4. D-006 – Existing Rear Elevations
5. D-012 Rev D – Proposed Site Plan
6. D-013 Rev F – Proposed Third Floor Plan
7. D-014 Rev C – Proposed Roof Plan

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8. D-015 Rev D – Proposed Front Elevations
9. D-016 Rev A – Proposed Rear Elevations
10. D-017 Rev C– Proposed Section AA and BB

The application is a re-submission following the refusal of a previous application, and as such, in accordance with Regulation 9 of the Town and Country Planning (Fees for Applications) Regulations 2012, no fee is required.

### **The Site**

The application site represents a 3 storey with part basement 'L' shaped residential block which was constructed in the 1920's.

The building is located on the bend at the southern end of Howitt Road at its junction with Glenilla Road. The area immediately surrounding the application site is residential in nature. The surrounding properties are 3, 4 and sometimes 5 storeys in nature along Belsize Grove and Belsize Park Gardens and 2 storeys with mansard roofs along Howitt Road. The majority of properties are terraced. Views of the site exist along both Howitt Road and Glenilla Road.

The site is located within the Belsize Conservation Area and specifically sub area 4. The building is identified by Camden Council as a building that makes a positive contribution to that.

The existing building is 'L' shaped in plan with 2 wings and a centralised entrance and stairwell. Externally the building has two lower floors of brickwork and a top floor of render. There is a large projecting coping at the top of the existing walls and a large flat roof. Windows to the principal living spaces comprises a tri-partite arrangement with a single, six light aperture to the centre, with flanking two light apertures, all with glazing bars. These are set within projecting bays that add interest to the rhythm of the elevations.

A small quantum of communal amenity space surrounds the building. There is no parking on the application site.

### **The Proposal**

The scheme proposes an attic storey to the existing building to create 7 additional residential dwellings with the following mix:

Flat No.	Size	Area
1	2 bed, 3 person	66
2	2 bed, 4 person	72
3	2 bed, 3 person	64
4	1 bed, 2 person	51
5	2 bed, 4 person	70
6	2 bed, 3 person	62
7	2 bed, 4 person	72

The proposed new units are self-contained with secure private entrances. They will be accessed via the main entrance and existing communal staircases, which would be extended upwards.

### Relevant Planning History

An application for a rooftop extension to provide 7 no. residential dwellings at the application site was refused on 3 August 2022 [application reference 2021/3839/P]. The reasons for refusal stated:

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.
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.
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.
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.
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.

The decision notice recognises that reasons for refusal 3, 4 and 5 could be overcome by entering into a Section 106 Legal Agreement for a scheme that was in all other respects acceptable.

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.

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 1**, specifically stated:

*"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.”*

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 was 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 2**, specifically states:

*“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 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. However during the course of the determination of the application, the Council raised concerns with regards to the design of the proposal which had been submitted.

Since concern was raised during the previous application three further design workshops have been held with officers at Camden Council, including the Conservation Officer. Details of those meetings are set out in the Design and Access Addendum which accompanies this submission. Specifically we note that officers confirmed via email on 13 July 2022 that officers supported the scheme which forms this application.

## **Planning Policy**

The Development Plan comprises the London Plan (“LP”) adopted in 2021 and the Camden Local Plan (“CLP”) adopted in 2017. The relevant policies are listed below and considered in the ‘Planning Appraisal’ section.

### London Plan (2021)

- GG2 Making the best use of land
- GG4 Delivering the homes Londoners need
- D3 Optimising site capacity through the design-led approach
- D6 Housing quality and standards
- H1 Increasing housing supply
- H2 Small sites
- H4 Affordable Housing
- H5 Threshold approach to applications
- H10 Housing size mix
- HC1 Heritage conservation and growth
- T5 Cycle Parking
- T6 Car Parking

### Camden Local Plan (2017)

- G1 Delivery and location of growth
- H1 Maximising housing supply
- H4 Maximising the supply of affordable housing
- H7 Large and small homes
- 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

#### Other Material Considerations

The National Planning Policy Framework (NPPF) is a material consideration in the determination of the application and is referenced and considered, where appropriate, in the planning appraisal section. In addition, there are a number of planning guidance documents that will be relevant to the development proposal and these include:

- Belsize Conservation Area Statement
- Camden Planning Guidance
  - o Design
  - o Housing
  - o Sustainability
  - o Amenity
  - o Transport
  - o Developer Contributions
  - o Housing

#### **Planning Appraisal**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act (1990) require planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

#### Principle of Development

LP Policy GG2 seeks to explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. LP Policy GG4 seek to ensure more homes are delivered and create mixed and inclusive communities, with good quality homes that meet high standards of design. CLP Policy H1 identifies that self-contained housing is the priority land use of the Local Plan. As such the principle of additional residential development in this location is acceptable.

The scheme is for 5 no. 2 bed units, 1 no. 3 bed unit and 1 no. 1 bed unit. CLP Policy H7 seeks to secure a range of homes of different sizes that contribute to the creation of a mixed, inclusive and sustainable community. As such housing developments should contribute to meeting the priorities set out in the dwelling size priority table and include a mix of large and small homes. The dwelling size priority table identifies that for market housing the need is high for both 2 and 3 bedroom homes and lower for 1 and 4 bedroom homes.

The previous application provided the same quantum and mix of development and officers confirmed that this was acceptable in light of the Dwelling Size Priorities table. Accordingly the mix of dwellings provided in this development meets the priority needs for housing and is in accordance with CLP policy H7.

#### Affordable Housing

CLP Policy H4 requires a contribution to affordable housing from all developments that provides 1 or more homes and a total floorspace addition of 100 sq m. In developments of less than 10 units affordable housing contributions can take the form of a payment in lieu. A policy compliant affordable housing contribution will be provided by this development (secured via Section 106 Agreement).

#### Design

LP Policy D3 seeks to make the best use of land and requires development proposals to enhance local context and respond to local distinctiveness. CLP Policy D1 identifies that the Council will seek to secure high quality design in development by requiring development to, amongst other criteria, respect local context and character, preserve or enhance the historic environment and heritage assets and comprise details and materials that are of high quality and complement the local character.

As part of the design workshops undertaken as part of the previous application, it was identified that a mansard roof design was not appropriate and that any extension should be formed with vertical external walls and create a flat roof. After exploring a number of potential materials officers confirmed that the brick extension was the most appropriate. Officers also confirmed that there should be no projections or recesses in the extension to make it as simple as possible, windows should be made smaller than the host building below and that the scheme should be set back as far as possible without compromising the accommodation.

The proposal is therefore for a simple roof level extension in brick to match the existing brown facing bricks. The extension has been recessed and render parapet walls introduced to follow the existing roof line and reduce the visual impact of the new extension. The corner of the extension has been designed to follow the existing chamfered profile of the host building. The window pattern in the building responds to that which already existing, providing smaller windows to secondary spaces and larger windows to main living area. The glazing on the windows has been subdivided to give a more traditional appearance.

The scheme therefore has been designed to be secondary to the original building and sit quietly on top of the roof. The style and form of the building is simple and the overall appearance contemporary, but low key. The proposal therefore fully accords with CLP Policy D1 and LP Policy D3.

## Heritage

CLP policy D1 seek to preserve and enhance the historic environmental and heritage asset and respect local context and character. CLP policy D2 requires development within conservation areas to preserve, or where possible, enhance the character of appearance or the area.

It is 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 is 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.

A Heritage Statement was undertaken by Cotswold Archaeology (dated July 2021) and submitted in support of the previous application. Following the submission of that application an objection to the proposed development was submitted by the Twentieth Century Society. Specifically, the objection highlighted the contribution of the flat roof to the Conservation Area and significance of the building. The objection also identified the architects of the building as Henry F. Webb and Ash.

Cotswold Archaeology undertook further research on the architects, Henry F Webb and Ash, the results of which are set out in the Heritage Technical Note. That 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.

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. 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.

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).

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.

The Conservation Officer David McKinstry provided comments on the previous application 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"*.

As such the proposal has been amended from a mansard roof to a simple flat roof extension. The revised proposal has also been simplified to achieve an understated design. The form and character of the existing building will remain, with all key architectural details retained. The single storey addition will represent a change from what exists currently, but in its muted form and simplistic style will not compete with the existing architectural treatment. The impact on the building will therefore be neutral with its heritage significance preserved.

In terms of height it is noted that the relatively low lying nature of the existing structure and the taller neighbouring building heights means that the additional storey will not rise above existing roof heights and will not form a dominant presence in the streetscene.

The proposal therefore preserves the character of the building and area and is in accordance with Local Plan Policy D1 and D2 and London Plan Policy HC1.

#### Amenity

LP Policy D6 and CLP Policy A1 seek to protect the quality of life of occupiers and neighbours and identify that development should not cause unacceptable harm to amenity.

LP Policy D6 seeks to maximise the provision of dual aspect dwellings. 5 of the 7 proposed flats are dual aspect and meet this requirement. Flat 3 and 4 are single aspect flats, however it is noted that single aspect flats are acceptable where the development is providing an appropriate design solution to meet the requirements of policy D3, which seeks to optimise site capacity. As the proposal is for an extension to an existing building, the provision of a small number of single aspect flats is unavoidable due to the existing footprint and layout of the building. Flats 3 and 4 will have adequate ventilation, daylight and privacy, and therefore still accord with LP policy D6.

Due to the design of the proposed scheme, the additional flats, in a manner similar to the existing residential properties, will not have their own private amenity space. This is because the introduction of balconies onto the roof of the building would compromise the design and appearance of the proposal and of the building as a whole. Residents will however have access to the communal amenity space around the building.

All other requirements for space and amenity in LP policy D6 as set out in the information in the accompanying Design and Access Statement.

CLP Policy A1 seek to protect the quality of life of occupiers and neighbours through factors such as visual privacy, outlook, sunlight, daylight and overshadowing, transport impacts and impacts of the construction phase.

Due to separation distances and the existing building the additional height of the proposed development will not create any issues with regards to sunlight/daylight of adjoining properties along Belsize Grove or Belsize Park Gardens.

In respect of overlooking the separation distance to properties in Belsize Grove means that over 18m separation between habitable windows, as set out in the Amenity SPG document, is achieved. In



respect of the properties on Glenilla Road the proposal will not have any significantly detrimental impacts over and above that which already takes place with the existing building.

A draft construction management plan is submitted as part of the application to consider issues with regards to the construction of the development in respect of highway, noise and air quality. This will be enhanced and expanded as the development process continues.

The amenity of both existing and proposed residents will therefore be adequately protected in accordance with CLP and LP policies.

### Highways

CLP Policy T1 seeks to promote sustainable transport by prioritising walking, cycling and public transport in the borough. As such it requires developments to provide for accessible, secure cycle parking facilities exceeding minimum standards outlines within the London Plan.

LP Policy T5 identifies a requirement for 16 cycle spaces, and those will be provided in the cycle store shown on the site plan.

CLP Policy T2 identifies that the Council will limit the availability of parking and require all new development in the borough to be car-free. In accordance with this policy no parking is proposed as part of the development. If a unilateral undertaking is required to restrict residents from applying for on-street parking permits this will be acceptable.

### Sustainability

CLP Policy CC1 requires development to minimise the effect of climate change and meet the highest feasible environmental standards that are financially viable during construction.

The Energy and Sustainability Statement undertaken by Environmental Services Design and submitted in support of this application demonstrates how the requirements of policy CC1 have been met.

The development will achieve a 20% CO2 reduction against Part L (2013 Building Regulations) from on-site renewables and this includes through the incorporation of photovoltaics. These are set out on the proposed roof plan, to address reason for refusal no. 2 of the previous application.

CLP Policy CC3 requires development to incorporate water efficient measures. In accordance with this the development will minimise the use of mains water by achieving a maximum indoor water consumption of 105 litres per person per day.

### **Conclusion**

The proposed development, which consists of a roof extension to the existing building maximises the use of the land and delivers much need housing for the area. The seven units meet the size requirements of the borough, and the scheme will deliver a policy compliant affordable housing contribution.

The revised design, which has been undertaken in collaboration with planning and conservation officers, has been simplified to achieve an understated design. The form and character of the existing building will remain, with all key architectural details retained. The single storey addition will represent a change, but in its muted form and simplistic style will not compete with the existing architectural treatment. The impact on the building will therefore be neutral with its heritage significance preserved.

The impact of the proposed development on the amenity of existing and proposed occupiers is considered acceptable.

The scheme therefore complies with the requirements of the development plan and is in accordance with the provisions of paragraph 11 of the NPPF. As such we ask that permission is granted without delay.

If any additional information or clarification is required please do not hesitate to contact me.

Yours sincerely

This letter is approved but unsigned as it is sent electronically.

Liz Young  
Senior Associate  
Planning and Environment Group

Please respond by e-mail where possible

## **APPENDIX 1**



**Planning Solutions Team**  
**Planning and Regeneration**  
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**Date: 12/05/2020**  
**Our ref: 2020/1404/PRE**  
**Contact: Kristina Smith**  
**Direct line: 020 7974 4986**  
**Email: Kristina.smith@camden.gov.uk**

Freeths LLP  
 Cumberland Court,  
 80 Mount Street  
 Nottingham  
 NG1 6HH  
*By email*

Dear Liz Young,

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

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

**1. Proposal**

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

**2. Site description**

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

**3. Relevant planning history**

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

**4. Relevant policies and guidance**

National Planning Policy Framework 2019

The London Plan 2018

Intend to Publish London Plan 2019

### Camden Local Plan 2017

G1 Delivery and location of growth  
 H1 Maximising housing supply  
 H4 Maximising the supply of affordable housing  
 A1 Managing the impact of development  
 D1 Design  
 D2 Heritage  
 CC1 Climate change mitigation  
 CC3 Water and flooding  
 CC5 Waste  
 T1 Prioritising walking, cycling and public transport  
 T2 Car-free development and limiting the availability of parking  
 DM1 Delivery and Monitoring

### Camden Planning Guidance 2018/ 2019

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

Belsize Conservation Area statement (2001)

## **5. Assessment**

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

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

### **Principle of residential accommodation**

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

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

*Affordable housing contribution*

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

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

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

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

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

## Residential Standards

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

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

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

## **Design and conservation**

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

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

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

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

The building is terminated with overhanging eaves and a flat roof; a unique feature of the building. At the same time; however, a different roof form on the building could be possible. If this building were to be able to accommodate a roof extension, its design would need to be informed by a deep understanding of the building, its architectural style and composition with attention paid to every detail in order to ensure a high quality and appropriate response.

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

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

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

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

### **Amenity**

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

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

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

### **Transport considerations**

#### *Cycle parking*

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

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

#### *Car parking*

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

#### *Construction management plan*

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

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



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

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

## **Sustainability**

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- 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.

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

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

## **6. Conclusion**

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

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

## **7. Planning application information**

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

- Completed form – Full Planning Application
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
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Non-major applications are typically determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

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

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

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

Yours sincerely,

Kristina Smith

**Senior Planning Officer  
Planning Solutions Team**

## APPENDIX 2



**Date: 07/12/2020**  
**Our ref: 2020/5007/PRE**  
**Contact: Kristina Smith**  
**Direct line: 020 7974 4986**  
**Email: Kristina.smith@camden.gov.uk**

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*By email*

[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

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.

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**Planning Solutions Team**