


Our Ref: 22405/MS/TH
Your Ref: 2022/3635/P
Email: 
Date: 02 November 2022

Kate Henry
Planning Department
LB of Camden Council



Dear Ms Henry,


PLANNING APPLICATION RELATING TO A ROOFTOP EXTENSION TO PROVIDE 7NO. RESIDENTIAL PROPERTIES AT HOWITT CLOSE, CAMDEN NW3 4LX

We write on behalf of our client, who consist of Resident Owners and Leaseholders of Howitt Close, in respect of the above application, which seeks permission for:

"Erection of mansard roof extension to create 7 self-contained flats (Class C3)"

The land in question relates to the rooftop of an existing residential block of flats in Camden at Howitt Close, with the applicant seeking to erect an additional storey to deliver the proposed residential units. Our clients consist of the residents and leaseholders of the building who are concerned regarding the impact of the proposed development on the local area. Whilst it is acknowledged that the application is for new residential properties that would contribute to the area's housing need, the residents are extremely concerned that the application fails to demonstrate that the proposed development would not have an adverse impact on Howitt Close and the setting of the surrounding area. Indeed, it is considered that it would have a far more severe impact on the design of the building than has been suggested in the submission documents and is therefore unacceptable in planning terms. As such, the residents and leaseholders wish to **object** to the application.

The application in question represents a redesign of a scheme refused in 2021 (ref: 2021/3839/P), for a mansard roof extension. Five reasons were given for refusal of this application as follows:

- 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***
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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.*

It is expected that Reasons 3 – 5 could be addressed through the signing of a Section 106 legal agreement and we observe that an energy statement has been provided as part of the submission pack in response to Reason 2 for review by the council's sustainability team. In the light of this, it is considered that the key issue relevant to this application is the acceptability of the proposed revisions to the design in the context of the surrounding heritage assets and whether the public benefits of the works would outweigh the harm that is caused by the proposals.

Notwithstanding this, despite this response to the current application being focussed on the reasons for refusal given for the previous scheme, our clients maintain that their remaining concerns regarding the proposed development still remain relevant and this will be detailed in individual submissions in due course.

Comments on application submission

From review of the submission pack, it is observed that the existing elevations appear to oversimplify the current design of the building. This is especially with regards to the upper floor where, as shown below, there is a significant amount of detailing that has been omitted, to include around the fenestration and the eavesline. This is depicted in figures 1 and 2 below. It is argued that the impact of the proposals on these features is an important consideration given the site's prominence on the streetscene.



Figure 1. Image of existing building



Figure 2. Extract of existing elevation

Further to the above, our clients wish to express their disappointment regarding the lack of communication about the proposed works by the landlord throughout the application process to date. They confirm that they have not been approached at all during the process so far, despite the applicant having multiple opportunities to do so during the pre-application and application processes.

Site background

The property consists of a three-storey L-shaped purpose-built block of flats hosting 46 residential flats. It is constructed of brown bricks with the top floor rendered white with red brick detailing around the windows. The building also has stepped bays and a flat roof with overhanging eaves. The roof level is unbuilt save for two rendered water-tank storage areas located centrally within the roofscape.

The site is located within the Belsize Conservation Area. Whilst not listed, the Area Statement for the conservation area (2003) does define the building as making a positive contribution to the character and appearance of the area.

The surrounding area is residential in character, featuring a range of semi-detached and terraced housing. Due to the changes in street level in the area, Howitt Close appears a similar height to the neighbouring properties, as shown at figure 3 below. Further photographs of the site and surrounding area are provided at [Appendix 1](#).



Image 3. View of site along Howitt Road

Planning history

The following planning history is considered of relevance to this case:

- 2021/3839/P: application refused (2022) for the construction of a mansard roof extension to create seven self-contained flats. Five reasons for refusal were given, as detailed above. In coming to their decision the case officer observed that the proposed development, 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 Glenilla Road. They also considered that the choice of materials would not be appropriate and went on to observe that the existing building has remained largely unaltered since its initial construction and therefore the flat roof forms part of the established character of the streetscene and local area.

- TP948/12543: application refused (1961) for the construction of an additional floor at third floor level containing fourteen self-contained flats. In determining the application the council considered it would result in a density inappropriate for the area, not accord with the council's daylighting standards for neighbouring properties, represent an overdevelopment of the site and have insufficient car parking facilities. An extract of the proposed design is provided at figure 4 below.

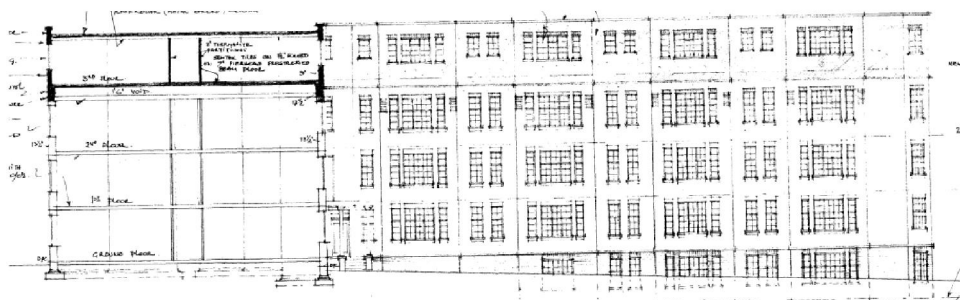


Figure 4. Proposed elevation from app ref: TP948/12543

Planning policy considerations

The following policies are considered of note as part of this application:

National Planning Policy Framework (2021)

In determining applications affecting heritage assets, **Paragraph 194** sets out that Local Planning Authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact on their significance. **Paragraph 197** also sets out that Local planning Authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

Paragraph 202 defines that where a development proposal is considered to 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, to include securing its optimum viable use.

London Plan (2021)

Policy D8 supports development proposals which ensure that the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscaping and surface materials should be of a good quality.

Camden Local Plan (2021)

Policy D1 sets out that development will need to be of a high quality that respects the local context and character. It goes on to set out that it should preserve or enhance the historic environment; comprise of high-quality materials; integrate well with the surrounding streets and open spaces; provides a high standard of accommodation and carefully integrates building services equipment.

Policy D2 specifically relates to heritage assets. With regards to conservation areas it sets out that development will need to preserve or enhance the character or appearance of the area.

Impact on views of the area

As part of the application submission, a Heritage Statement addendum has been prepared by Duncan Coe Heritage. This concludes that they maintain the view that there would be no impact on the significance of the heritage assets as a result of the proposed works, with the additional floor not considered to rise above existing roof heights and thereby not form a dominant presence in the street scene. In coming to this conclusion, they also downplay the credentials of Henry F Webb & Ash, the architects that are understood to have designed Howard Close.

As detailed in the Belsize Park Conservation Area Appraisal, it is recognised that roof extensions and alterations which change the shape and form of the roof can have a harmful impact on the Conservation Area, especially where it is prominent, particularly in long views. As detailed at planning policy at all levels, significant weight needs to be given to the impact of development on the setting and significance of designated heritage assets. In particular, Policy D1 defines that development needs to be of a high quality that respects the local context and character and Policy D2 sets out that development affecting the setting of conservation areas needs to preserve or enhance the character or appearance of the area. In this regard, Howitt Close is located at the junction of Howitt Road and Glenilla Road and is defined as making a positive contribution to the area.

With regards to the significance of the building, reference is made to the buildings that make a positive contribution doing so because of their value as local landmarks or as particularly good examples of the local building tradition. Accordingly, the significance of this should not be reduced due to the qualifications of the architects at the time.

As shown at figures 5 & 6 below, the proposed development represent the introduction of a new storey to the roofscape of the building. Given its size, height, choice of materials and location along the entirety of the roofscape, it is considered that it will appear as a prominent structure in views along Howitt Road and Glenilla Road, changing the appearance of the building from one that is in keeping with the massing of the surrounding properties to one that is of greater height. The applicant has sought to reduce the impact slightly through the use of a parapet. However, this is not considered to fully mitigate the change.



Figure 5. Extract of submitted proposed north-east elevation



Figure 6. Estimated massing visible along Howitt Road

It is also considered that the detailing would continue to be out of keeping with the wider building. Whilst the applicant has sought to improve the proposed design from that originally proposed under 2021/3839/P, it will still represent a top-heavy development in the context of the existing property, diminishing the prominence of the rendering on the upper floor, which currently acts as a successful termination to the building. It is therefore considered to not be sympathetically designed and will have a detrimental impact of views in the area.

In the light of the above, it is our client's view that the proposed development will continue to have a more significant impact on the design of the building and its setting within the Belsize Park Conservation Area than suggested by the Applicant, despite the changes made. The proposals, which relate to the development of a full storey to the building, should therefore be considered inappropriate for this location accordingly.

With regards to the public benefits of the scheme, it is noted that the proposed development would help deliver seven residential properties on an existing residential site. Whilst it is acknowledged that there is a need for further housing in the borough, this demand is not considered to significantly outweigh the potential harm caused by the scheme as detailed above.

Other matters of note

It is observed that there are existing building services at roof level, in the form of water storage tanks for the existing building. From review of the proposed plans, this facility will be replaced by residential accommodation. However, no details have been provided showing where the existing services will be located and whether it will be sufficient to support an increased number of units onsite. It is our view that consent should not be given until this detail is provided in accordance with Policy D1.

Local Policy CC5 sets out that all developments need to include facilities for the storage and collection of waste and recycling. The existing bin store for the site is limited in size and our clients confirm that it is always either at capacity or over-full. It is understood that additional storage is proposed as part of the development. However, insufficient detail is provided to confirm whether this would be adequate to meet the future needs of the site and it is also unclear whether this would be visible from the public realm. Accordingly, it is our view that such detail should be provided prior to any consent for the site being issued so that the details can be appropriately considered.

No details have been provided regarding fire safety in accordance with London Plan Policy D12. Consent should not be given until this detail is provided.

Conclusions

In conclusion, it is considered that the proposed development has the potential to have a negative impact on the character, views and historic significance of the area. As such the application proposals do not accord with the relevant local and national planning policies and the public benefits are not considered to outweigh the harm caused. Accordingly, our clients urge the Council to refuse this application.

We trust that the above objection will be taken into consideration in the determination of the application and request to be kept up to date on its progress. In the meantime, if you have any queries regarding the issues raised, please do not hesitate to contact me.

Yours sincerely,



TIM HUMPHRIES



Appendix 1 – Photographs of the site and surrounding area



Image 1. View of existing roofscape (1)



Image 2. View of existing roofscape (2) – showing existing water storage facilities for building



Image 3. View of roofscape for No. 57 Howitt Road from application site



Image 4. Long view of site along Glenilla Road



Image 5. View of properties along Howitt Road