

Application No:	Consultees Name:	Received:	Comment:	Response:
2022/3635/P	Jeff Leung	05/11/2022 11:39:50	OBJ	<p>I am objecting this proposal as a resident of Howitt Close. The main concern for me is the ability of our building to cope with 7more flats. We have been experiencing shortage of heating and hot water from time to time. It is a fundamental issue that probably caused by the capacity of the heating system. If the building cannot support the current population, how can it sustain more?</p> <p>I also worry about the construction will affect all the residents for years.</p> <p>I therefore oppose this proposal. Thank you.</p>
2022/3635/P	Frances Pinter	08/11/2022 20:10:11	COMMNT	<p>Changing the appearance of an Art Deco building by increasing the height of a building in the Belsize Conservation Area will seriously damage the look of the appearance and is contrary to all principles of designating buildings to be in a Conservation Area.</p>
2022/3635/P	Frances Pinter	08/11/2022 20:10:14	COMMNT	<p>Changing the appearance of an Art Deco building by increasing the height of a building in the Belsize Conservation Area will seriously damage the look of the appearance and is contrary to all principles of designating buildings to be in a Conservation Area.</p>

Application No:	Consultees Name:	Received:	Comment:	Response:
2022/3635/P	Mrs Sandra Gonzalez	02/11/2022 17:04:52	OBJ	Reference: 2022/3635/P.

I, Mrs Sandra Gonzalez, am the joint owner of Flat 19 Howitt Close with my husband Mr Sebastian Gonzalez.

We maintain our views in relation to our objections to the previous planning application 2021/3839/P.

I also make the following objections to the new scheme as follows:

Planning policy at all levels requires that 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 with regards to development affecting the setting of conservation areas, it 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, within the Belsize Park Conservation Area, and it is recognised within the associated area appraisal as making a positive contribution to the character and appearance of the Belsize Conservation Area.

It is noted in the application's submission pack that the Heritage addendum seeks to downplay the credentials of Henry F Webb & Ash, the architects that are understood to have designed Howitt Close. However, the architects have a Grade II listed building to their name – Elm Park Court – as well as the Hendon ABC cinema. Our building has been considered of merit in the area appraisal due to its appearance in many various heritage organisations. Therefore, the significance of the accusation of the eligibility of the architects should not be reduced by the freeholder, irrespective of the qualifications that the freeholder is attributing to the architects at the time.

We think that the freeholder's choice of Cotswold Archaeology is an unsuitable company for a heritage statement chosen to pass judgement on Howitt Close. They are a countryside archaeological company who are therefore not considered appropriately qualified to judge a 20th-century urban architectural development.

Whilst it is recognised that there is a need for new housing throughout London, any new development needs to accord with the development plan in its entirety. The proposed development represents the introduction of a new storey to Howitt Close, which due to its design, massing and choice of materials, will appear as a prominent, and aesthetically inappropriate, addition to the property. This will result in the building no longer being read as of a height similar to that of the neighbouring properties along Howitt Road but one of greater massing. It would therefore be considered harmful to the setting of the conservation area.

It is not considered that the public benefits of additional residential units would be sufficient to outweigh the harm caused by the proposed development on the setting of the designed heritage assets and therefore the proposals should be regarded as in conflict with Paragraph 202 of the NPPF.

Finally, the proposed development would involve the removal of water storage facilities serving the existing properties onsite. No details have been provided to confirm where these facilities will be relocated and therefore this detail should be provided prior to any consent being forthcoming so that full consideration can be given to the acceptability and deliverability of the scheme.

Mrs Sandra Gonzalez

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Application No:	Consultees Name:	Received:	Comment:	Response:
2022/3635/P	Martin henfield	01/11/2022 11:52:02	COMMNT	<p>It is evident that this new application differs very marginally from the 2021 application of similar scale. Indeed, the applicants have once again made little attempt to provide a comprehensive assessment of the impact of this slightly revised design. Given that this is hardly a new application, I am assuming that the objections to the previous application still hold legal standing. However, in the event of that the Council do not take account of the 2021 objections, I am repeating my previous objection that I made in 2021 'in toto'.</p> <p>"I object to this planning application on 2 main grounds – (i) the inadequacy of the planning application in legal terms and (ii) on several material planning considerations. As a professional in planning matters both at local, regional and national levels over some 30 years, I have never seen such an opaque set of support documents accompanying a totally inadequate planning application letter dated 27th July 2021 from the Applicants. Certainly, the officers of Camden will be unable to undertake a robust and legally competent assessment of this application based on the documentation to hand and hence will not be able to provide an unbiased recommendation to Councillors. Despite clear guidelines contained in the 2 published letters from Camden to the Applicants, there appears an unwillingness to undertake the necessary assessments by the Applicants – whether by design or default. Camden explicitly requests amenity assessments from the Applicants. For instance, from the letter dated May 2020, it is stated: 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. Initially, as the Council is aware, the Applicants failed to provide the draft CMP. The draft CMP was eventually provided well after the consultation period commenced after pressure from the residents of Howitt Close. The draft CMP is clearly an unprofessional document lacking in any detail and providing contradictory data. Furthermore, the Applicants have – again - either by design or default completely disregarded the requirement to undertake any consultation with either residents or other local people. On page 12 of pro forma draft CMP it states: A neighbourhood consultation process must have been undertaken prior to submission of the CMP first draft. A consultation process specifically relating to construction impacts must take place regardless of any prior consultations relating to planning matters. This consultation must include all of those individuals that stand to be affected by the proposed construction works. The Applicants response is: This draft CMP has been prepared for submission with the planning application and is intended to set out as much information as is possible for the Council's consideration prior to the determination of the planning application Following the granting of planning permission, it would be the duty of the appointed contractor or a professional company on behalf of the applicant to carry out Community Liaison. This is simply an avoidance of consultation – particularly with the residents. The Applicants started this process before 30th April 2020 as I note that a virtual meeting was held on that date between the Council and the Applicants. At no time in the following 15 months did the Applicants seek the views of the residents and Page 5 of 25 Printed on: 17/11/2021 09:10:05 Application No: Consultees Name: Received: Comment: Response: others in the impact area and therefore are not able to claim that their application is informed in anyway by those most likely to be affected by this proposal. This is dereliction of their obligations. No doubt officers of the Council will note this failing. It is evident that other aspects of a comprehensive amenity and transport assessment are completely lacking from the application. Failure to undertake any geological/structural engineering fieldwork leaves the potential construction subject to the possibility of subsidence – an issue of relevance in various parts of NW3. Without fieldwork involving the placing of test bore holes, the Applicants cannot provide evidence regarding the safety of this proposal. The transport assessment is threadbare and takes no account of other high transport generators within the impact area</p>

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particularly as these projects will generate traffic well beyond the actual sites of construction. This failure of assessment analysis manifests itself further by a complete lack of any accumulative impact assessments. Overall, this application fails to provide adequate and robust assessments that would allow the Council to undertake a proper forensic examination of the proposals and furthermore deny those most affected by the proposals to be able to provide comprehensive comments/objections given this lack of assessments. Under section 38 of the Planning and Compulsory Purchase Act (2004), decisions on planning applications 'must be made in accordance with the [development] plan unless other material considerations indicate otherwise'. The courts ultimately decide what constitutes a material consideration. However, case law gives Camden a great deal of leeway to decide what considerations are relevant, and how much weight should be given to them. I believe that material planning consideration that support the refusal of this application include: • The build overlooks other homes, causing loss of privacy • The build's appearance will be out of character with the existing property • Overdevelopment • It impacts on highway safety • Negative effect on nature conservation A development of this size needs to be assessed on a highly localised level not in a borough wide context. It is clear that the proposal would have a significant effect on the local environment by virtue of nature, size and location. I request notification of the planning committee meeting that will address this application and reserve the right to make a short presentation (under 5 minutes) as well as the right to cross-examine officers and the Applicants (should they be in attendance. Thanking you for your consideration, Martin Shenfield"

As mentioned above, virtually nothing has changed in the new application. Reason 1 of the Refusal Reasons for Planning Application - 2021/3839/P states: "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."

The applicants still fail to conduct any consultation with residents of Howitt Close or nearby inhabitants that would be affected by this development. No attempt has been made to undertake visual intrusion impact assessments from buildings that will ne impacted by the proposed development.

The planning statement states:

"The revised design, which has been undertaken in collaboration with planning and conservation officers, has been simplified to achieve an understated design"

The so-called simplification of design completely fails to address the substance of Reason 1 of the previous refusal reasons. Based on desultory amendments to the original design and the unusual exchange of emails between the Council and Freeths posted 13/10/22 during the Consultation Period (indeed after many objectors had posted their objections) simply does not change the nature of the 2022 application compared with the 2021 application.

On that basis alone, the Council is obligated to find the same conclusion.

Thanking you again for your consideration again,
Martin Shenfield

Application No:	Consultees Name:	Received:	Comment:	Response:
2022/3635/P	Jeff Leung	05/11/2022 11:39:46	OBJ	<p>I am objecting this proposal as a resident of Howitt Close. The main concern for me is the ability of our building to cope with 7more flats. We have been experiencing shortage of heating and hot water from time to time. It is a fundamental issue that probably caused by the capacity of the heating system. If the building cannot support the current population, how can it sustain more?</p> <p>I also worry about the construction will affect all the residents for years.</p> <p>I therefore oppose this proposal. Thank you.</p>
2022/3635/P	Rebecca Crossan	25/10/2022 00:05:08	OBJ	<p>I am a tenant in Howitt Close. I would like to comment on the planning application to build a new floor on the top of Howitt Close. Reference: 2022/3635/P.</p> <p>The first thing I noticed and loved about Belsize Park, when I moved here, was the Art Deco buildings. Howitt Close, of course, and on nearby streets, Haverstock Hill and Belsize Grove. If you walk down Howitt Road, from the Belsize Park tube station, Howitt Close slowly appears through the trees. Building modern flats on top, will ruin this lovely, historic building and the look of the street.</p> <p>From a personal perspective, if the building works go on for months and create noise and dust, I may need to move out, which of course, will be disappointing for me. I work from home most days. I won't be able to concentrate with the drills etc. Also, if dust comes inside the building or in my flat, and it affects my asthma, I will have no choice.</p> <p>Thank you. Kind Regards, Rebecca</p>
2022/3635/P	Jeff Leung	05/11/2022 11:39:43	OBJ	<p>I am objecting this proposal as a resident of Howitt Close. The main concern for me is the ability of our building to cope with 7more flats. We have been experiencing shortage of heating and hot water from time to time. It is a fundamental issue that probably caused by the capacity of the heating system. If the building cannot support the current population, how can it sustain more?</p> <p>I also worry about the construction will affect all the residents for years.</p> <p>I therefore oppose this proposal. Thank you.</p>

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2022/3635/P	Howitt Close Resident	03/11/2022 16:47:33	OBJ	<p>I will start with the absolute nonsense of allowing a new application on any grounds as it being totally ridiculous.</p> <p>On all the reasons that were standing on the last application, but somehow still have to be repeated: Belsize Park is a Conservation Area and this application contravenes your own Council's policies. The excessive noise and dust that this "project" will create in an area where all the residents are already settled and enjoying a quiet living.</p> <p>What does the Council think will happen with parking and access to emergency vehicles on a such narrow and weirdly shaped street already?</p> <p>I didn't vote for liberal Councillors that allow such a disruption on the livelihood of a whole neighbourhood for the profit of the few.</p> <p>And on a last note, putting up a yellow notice on two lampposts in 5 metres of each other and not amending the date until which the public can make comments seems like sabotage and not what is expected of the council.</p>

Application No:	Consultees Name:	Received:	Comment:	Response:
2022/3635/P	Mr Sebastian Gonzalez Ramirez	02/11/2022 17:10:06	OBJ	Reference: 2022/3635/P.

I, Mr Sebastian Gonzalez Ramirez, am the joint leasehold owner of Flat 19 Howitt Close with my wife Mrs Sandra Gonzalez. We maintain our views in relation to our objections to the previous planning application 2021/3839/P.

I also make the following objections to the new scheme as follows:

Planning policy at all levels requires that 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 with regards to development affecting the setting of conservation areas, it 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, within the Belsize Park Conservation Area, and it is recognised within the associated area appraisal as making a positive contribution to the character and appearance of the Belsize Conservation Area.

It is noted in the application's submission pack that the Heritage addendum seeks to downplay the credentials of Henry F Webb & Ash, the architects that are understood to have designed Howitt Close. However, the architects have a Grade II listed building to their name – Elm Park Court – as well as the Hendon ABC cinema. Our building has been considered of merit in the area appraisal due to its appearance in many various heritage organisations. Therefore, the significance of the accusation of the eligibility of the architects should not be reduced by the freeholder, irrespective of the qualifications that the freeholder is attributing to the architects at the time.

We think that the freeholder's choice of Cotswold Archaeology is an unsuitable company for a heritage statement chosen to pass judgement on Howitt Close. They are a countryside archaeological company who are therefore not considered appropriately qualified to judge a 20th-century urban architectural development.

Whilst it is recognised that there is a need for new housing throughout London, any new development needs to accord with the development plan in its entirety. The proposed development represents the introduction of a new storey to Howitt Close, which due to its design, massing and choice of materials, will appear as a prominent, and aesthetically inappropriate, addition to the property. This will result in the building no longer being read as of a height similar to that of the neighbouring properties along Howitt Road but one of greater massing. It would therefore be considered harmful to the setting of the conservation area.

It is not considered that the public benefits of additional residential units would be sufficient to outweigh the harm caused by the proposed development on the setting of the designed heritage assets and therefore the proposals should be regarded as in conflict with Paragraph 202 of the NPPF.

Finally, the proposed development would involve the removal of water storage facilities serving the existing properties onsite. No details have been provided to confirm where these facilities will be relocated and therefore this detail should be provided prior to any consent being forthcoming so that full consideration can be given to the acceptability and deliverability of the scheme.

Yours sincerely

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Mr Sebastian Gonzalez Ramirez

2022/3635/P THE HEATH &
HAMPSTEAD
SOCIETY 26/10/2022 11:35:23 COMMNT

OBJECTION
From:
THE HEATH & HAMPSTEAD SOCIETY

This excellent and well preserved example of a 1930's group of flats was carefully designed to visually relate to the existing terrace houses. Any attempt to build another storey on top of the existing building will ruin the carefully composed facades - and this attempt is particularly crude and top-heavy.

We would support most enthusiastically the application for these flats to be Locally Listed.

It is noticeable that the elevations included in the application do not include the adjacent houses - if they did it would reveal how well the design of the flats relates to the scale and character of the existing houses - and how badly the proposal does.

Please refuse.

Application No: 2022/3635/P
Consultees Name: Duncan Webster
Received: 02/11/2022 13:24:02
Comment: OBJ

Response:

Dear Ms Henry,

Planning Ref: 2022/3635/P (Objection)

I am the flat owner of 33 Howitt Close (HC) now for 30yrs. I am sincerely shocked to see that another hasty application has been lodged, since the previous submission (2021/3839/P) was refused and so clearly criticised in the Delegated Report (DC) and Decision Notice (DN).

I confirm my objection to the new application 2022/3635/P.

The application is clearly still in breach and contrary to policies D1 (Design), D2 (Heritage) of CLP 2017 and the previous decision notice, specifically item No 1. In addition, any development of this heritage asset would go against the policy for protection of the Belsize Park Conservation Area (BCA) and certainly would not enhance it or bring any public benefit.

It is also noted, that the Heritage Addendum is plainly an effort to discredit the original architects, who actually did make a significant contribution at the time of HC's creation, whilst downplaying the special qualities of the carefully crafted design, which was specific to its time and location.

Finally, there has been no consideration given to the application's viability, its deliverability, its impact and effect on the heritage asset, its occupants, neighbours and BCA as a whole.

As the new application has sparse supporting written documentation, please see following in reverse in reverse order to support my objection:

- Objections to Application No 2022/3635/P
- Previous Objections, which are still relevant from Application No 2021/3839/P (main application uploaded 10.08.2021).

Note, there are two parts to 2021/3839/P, which are summaries only:

1. The first lists the initial objection. (02.11, uploaded 03.11.2021).
2. The second relates to the Construction Management Plan (dated 03.2021), which was initially omitted from the main submission (10.08.2021), being uploaded 27.10.2021.

2022/3635/P: Objections:

PLANNING and DESIGN SUMMARY:

As stated, it comes as a total disbelief that a new application (2022/3635P) has again been submitted for development of Howitt Close (HC), especially as it simply does 'not address' any of the objections raised in the Delegated Report DR), (2021/3839P). The DR recorded comprehensive objections / comments by heritage experts, including the Conservation Officer (CAAC), Belsize Society (BS), C20th Society (C20) and in addition local individuals, who have an interest in the (BCA) and the HC, such as residents and neighbours, who themselves listed numerous objections.

Although, the new planning and design access statements states, that the new application has been developed in consultation with the planning and conservation officers, CAAC has already submitted formal objections, with I believe, BS and C20 to shortly follow. This is now the second time an application has been

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refused with earliest being back in 1961, TP948/12543 (over development and rights of light).
The application is fundamentally not justified or suitable for such an existing building and would constitute a serve adverse impact, direct loss and harm to both the core essence of HC and BCA.

As stated above, the application is not supported by a full series of written documentation, but only a few addendums to the refused application, thus reducing the weight of material that could be used to reinforce the basis for objection and refusal.

DESIGN and IMPACT:

HC's is a unique individual building of its time, own character, with its presence woven into the BCA. It is evident from the first point listed in the DR, that the application for development of HC within BCA is not suitable or justified as stated below:

Reason No 1 of the previous refusal is clear, 'DETAILED DESIGN, BULK, MASSING, HEIGHT, MATERIALS, UNDUE PROMINANCE COMPROMISING THE FORM, CHARACTER and APPERANCE OF THE HOST BUILDING and WOULD THUS HARM THE CHARACTER OF THE STREET SCENE and BCA, CONTRAY TO THE POLICES D1 (Design) and D2 (Heritage) of CLP 2017'.

The resubmitted proposals mirror and retains its predecessor's volumetric density, but which has now been amplified and actually appears to have increased in height, with the leading roof edge heightened further, this being masked by the introduction of a deceptive white parapet wall in attempt to reduce its impact. It retains its top heavy and crude appearance, distorting the existing building's unity and composition.

As per the previous objections, the application has totally ignored confirming levels (may still increase further). It is therefore assumed it has not technically been sufficiently developed taking into account existing roof top services (water tank enclosures, boiler flue, services distribution) and new construction build-up (floors, walls and roof etc.). Not forgetting that the existing omitted services will have to be reinstated for the building to function. Again, the buildings height would increase as these functions are reintroduced- the drawings are thus not a true representation. Is this further compounded as the previous construction management plan (CMP) appeared to be undeveloped, pushing many decisions further down the planning process, until after any potential preliminary approval, leaving many technical, constructional and logistical issues unresolved, surely this is not acceptable?

Again, the applicant has ignored the issue of 'rights of light and overshadowing', which previously formed part of the 1961 refusal. Any new addition would also increase the issue of loss of sky views, overlooking and privacy, with the potential for the increase in transmission of sound to the buildings residents and air borne sound to the surrounding neighbourhood.

Also, the development has the perceived potential for loss off or reducing the value of the existing accommodation through, a lengthy constructed period (noise, dust' vibration, disruption to services, traffic congestion, damage to trees and planting etc.) and actual detriment to the existing heritage asset once completed.

Throughout the process, the applicant has continually not followed the planner's advice to engage with the HC's leaseholders or carry out any community liaison. In general, this whole process has been traumatic for

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many causing much distress, especially as leaseholders are in the process of obtaining the freehold (on-going).

TECHNICAL IMPACT on the PROPOSALS / VISUAL IMPACT.

ENVIROMENT:

How can the introduction of visible standalone rooftop photovoltaic panels be acceptable within the BCA, surely this will set a dangerous unforgivable precedent for future developments? Surely, the proposal of these modern alien installations is certainly not suitable within the BCA and HC, damaging HC's integrity, its views locally, at height and from afar.

In addition, there is no visual representation of the impact of new services (Photovoltaic infrastructure, plant enclosures, service's inlets and outlets, SVP's, other service distributions required to make the existing building function and potential additions for the potential etc.) or required modification to existing ones (specifically SVP's, which will need to be extended above any new window heads). How are these dealt with without leading to severe damage of existing buildings appearance?

STRUCTURE / CONSTRUCTION:

There is no technical statement regarding how the development would be undertaken and to what risk HC's external and internal building fabric may be comprised. How are new structural loads transferred through the existing building. The proposed masonry walls are now substantially set back from the main load bearing structure as indicated on the 1961 Section; can the existing shallow strip foundation accommodate additional loads? How do the new services puncture HC's fabric (roof development to ground and vice versa) In all cases would not any development cause serious harm to the historic asset, disruption to HC's resident's, surrounding neighbourhood and the BCA.

SUMMARY:

HC deservedly and surely needs to be protected from excessive and opportunist development / developers. The previous DR's refusal summary states and records that the application is in conflict with the policy documents D1 (Design) / D2 (Heritage). Specifically Item No 1 is a core issue that can not be resolved in the context of a heritage asset, surely concluding with refusal. Refusal will allow HC to continue contributing to and enhancing the character of the BCA, as it should and always has, please refuse this application.

Part No 1: 2021/3839/P: Objections:

ASSESSMENT:

Is not the Council 'protector' of the conservation areas: Are not the council by policy legally obliged to provide protection of those buildings of historic interest? The above statement is hard to understand when Howitt Close (HC) is stated as and 'identified as making a positive contribution to sub area 4 (Glenloch) of the Belsize Conservation Area'.

DESIGN CONSIDERATIONS: Generally Based on the Applicants Submission.

• Policy and Written Statements regarding HC:

Is Camden Council not the guardian of Conservation Areas? The Councils Design Policies (D1) or Heritage (D2) do not appear to be considered after the pre-application advice dated of 12.05.2020, which clearly highlights all the qualities of HC.

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- Local Housing Patterns:

In generally, it can be seen that the conservation area comprises of large residential zones built at different times, with their own identity woven and joined together by smaller scale buildings like HC.

- HC Architectural Language & Honesty:

Is an Arc Deco design constructed between 1920-35's (stated by applicant) which is nearly 100 yrs old. (surely it didn't take 15yrs to complete)? The architectural influence of Arc Deco features is executed both externally and internally (all common parts), with its enchantment being completely driven by its visual appearance, palette of material and detail. If anything and to the contrarily, it can be clearly viewed that HC has taken inspiration from some of influences embodied in the Edwardian terraces of HR, respecting and extending the material essence and language with in its design.

- HC should be seen and retained for what it is:

A unique individual building of its time, certainly not subservient to any other. The 'L' form of the building accommodates both changes in level & works as a pivotal transition between the compressed terrace line of HR into the more open Glenilla Road (GR) and spacious Belsize Park Gardens (BPG).

- HC is of a distinct mass and scale:

It combines materials and colour cleverly to create its architectural form. Its visual composition is broken down by its fenestration patterns, access / egress points and incorporates a flat roof that typifies Art Deco buildings. The extended 'eaves crown' reinforces the elevational modelling visually making it complete, and certainly does not look unfinished as implied in application! Why ruin a perfectly good building's appeal by adding an additional floor to impersonate its neighbours?!

- The new addition is a total foreign architectural element:

HC is designed as an individual apartment block. Surely if HC was meant to match its neighbours, it would have been repeated when the building was 1st introduced to the area. HC must be seen for what it is, a unique individual building of its period, and maintained as existing retaining the integrity of it and the conservation area. Adding a false mansard would certainly detract from its value as an asset of historic significance. Adding a false mansard to HC can never be make it become a part of the continuous terraces that typify HR, GR and BPG.

- HC composition:

Skilful uses a palette of materials, colour and texture as not to dominate its location. The lower ground levels are constructed from dark brick to form its base. It is crowned by a lighter white rendered upper floor with a slim extended eaves, which reduces its mass, scale sensitively fitting well within its setting and neighbours. HC is clearly seen to be a similar height to adjacent residences. The addition of the 3rd floor would not just make the building over dominant, but would overwhelm the existing building's, mass and scale crowding its delicate composition.

It is evident from renders that HC would lose its individual architectural honesty. It evades and mimics the form of a mansard. It is a fake, consisting of a slopping angled roof line, topped with what is basically a flat roof. The roof and it's projecting window bays creates a pattern of what entirely engrosses HC and its neighbours, being completely out of scale and inappropriate to its setting providing a negative response to a heritage asset.

- Bay study of existing & proposed:

In addition, it is surprising that there is no general construction study of the existing and proposed additions (section / elevation). The associated images do not provide confirmation of what the proposals are? The study would have provided clarity in:

1. Comprehensive understanding of buildings constructional composition: There is no information to explain materials, their build-up, thicknesses and the impact on interface between existing building and the new. 3rd

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floor addition This would also expose the relationship between the mass, scale and materials negative relationship between too.

2. From the DAS, it appears to introduce elements that are totally foreign to any architecture in the area- windows are termed 'Micro HC Frames'?

3. Confirmation of the buildings final height: There are no levels indicated on application information- the building can well grow in height after any potential approval that is graphically shown on the drawings. You have thought levels would be fixed at the application stage and not later?

• Internal Original Common Parts:

Although not a part of planning: The internal communal areas are generally original, intact and have been well maintained. Staircases & Internal Features: Some of the existing features such staircases, railings and mouldings will no doubt be destroyed during local demolition of the 3rd level floor slab (existing roof) with the new insertions link the 2nd floor, completely ruining the current integrity of the unified interiors of the main and escape staircases.

ENVIRONMENTAL and SUSTAINABILITY: Comments based on 'Environmental Services Report & Drawn Submissions'.

• The existing (elevations 05 & 06) and proposed (roof plan 014, elevations 015 / 016 and section 017): The drawings do not show the existing services? How are these taken into account within the proposals e.g. The water tank would need to be raised above the 3rd floor roofline to form a local 4th level, existing boiler chimney extend, SVP extended above the new windows heads- all will have a visual impact on the building. Can the existing RWP system accommodate the additional load? or would pipework need remodelling.

• The Executive Summary Statement, 'to be green: renewable energy':

This document mentions the use of onsite renewables incorporating photovoltaics (PV's) PPC1 'Climate Change Mitigation'. The planning drawings do not indicate the location, their extent and impact on the existing and proposed building. A flat roof has been indicated. The flatter the panels the more you require (The optimum performance for PV's London is around 65° the proposed roof is approx. 1.5-2°). Surely if allowed these would become an eye saw to those who have an elevated roof top view.

• Be Lean- Use Less Energy:

Mechanical Ventilation with Heat Recovery (MVHR) Assume these units are located within each flat (there is no pitched roof void to accommodate the units, basically a flat roof).

1. Are these units not traditionally an air to air heat hump facility that would require both air inlet and exhaust ports (IEP's)? Does the MVHR's require any external plant that has not been identified?

2. The IEP's have been omitted from the proposed roof plan (014), section (017), elevations (015 & 016) and architectural renders- what is the visual impact?

3. Do the IEP's have the potential to create external noise and contaminate outside air adjacent to other windows?

• Additional Comment:

There is no demonstration of the impact the 3rd proposals will have on the exiting roof top services / distribution. They are completely ignored as if they don't exist & would need reinstated for HC to operate. (It is assumed that some the existing services would need to be temporarily disconnected cause all kinds of problems for the existing occupiers?)

• Construction Management Plan (CMP):

On writing the CMP was not on CC's planning portal. It is assumed the above will be reviewed as part of planning application, ensuring the proposals have been fully investigated to a sufficient standard to confirm that there are no complications further down the projects path.

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AMENITY:

Camden Council's PA advice: In both letters from Camden Council to the applicant they state:

1. Letter dated 12.05.2020:

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

2. Letter dated 07.12.2020

'You are strongly advised to consult with existing occupants and involve them in the process'.

THE ABOVE NEVER TOOK PLACE WITH ALL RESIDENTS TOTALLY IGNORED. All residents: Occupiers and parties of interest have been totally disregarded and ignored. The first the occupants knew about application was when a yellow notification was posted outside the building.

HC is an occupied and not empty / vacant residential block: The Applicant has treated the building as if it was entirely unoccupied. The existing roof appears to be treated as an empty site plot. There has been not contact or any inclusion as part of the applicant's intentions to either the HC Self-Management Group or as individual occupiers.

• The Construction Management Plan:

At the time of writing: The CMP has been omitted from the application, although it is listed both as part of the planner's requirements and within the applicants covering letter. This document is very important as it would highlight the impact of the proposals on the, existing building, occupants and neighbourhood, through from demolition to completion. The below list is only a small example, but has additional associated comments. The proposals would generally have a devastating environmental & sociological impact, not just to HC residents but to the surrounding neighbourhood:

1. Demolition (vibration, noise & dust etc.).
2. Suspension or temporary disconnection utility services (water / electrics)?
3. Suspension or temporary disconnection of water (water tank / boiler flue).
4. Traffic Management (deliveries / refuse removal etc.).
5. General noise and constant impact noise (whole building, but especially the 2nd floor).
6. Vibration, potential cracking in walls ceilings / party wall records would be required
7. Dust (can only be slightly mitigated if the entire roof is fully enclosed. Any dust would no doubt end up being carried through the existing buildings windows etc.).
8. Air quality (as part of the above No 7).
9. Reduced usage of the main and fire escape access (construction of new staircases would temporarily require closure of staircase?).
10. Site huts (Site office, welfare cabin, toilet & tool / plant storage etc.).
11. Loss of privacy.
12. Long term security risk (scaffolding or any high level lift etc.).
13. Loss of sky view and daylight. Wouldn't any scaffolding need to be twice as high? The roof would require weather proof scaffolding coverage as the roof would need to be stripped & reconstructed requiring a double height volume to enable works of the 3rd floor roof to be constructed? (The enclosure would surely need to be weather tight.

• Traffic management:

There is one additional acoustic observation with regard to HC. HC appears to form part of a geometry (90°)

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creating a form of sound box between HR and GR intensifying acoustic levels between all the buildings. On a daily basis the noise from construction operations and additional vehicles will most likely be higher than normally experienced. (a constant nuisance not just on a daily basis but for some years).

- Other existing current sites along HR:

Even smaller residential developments & general deliveries vehicles are problematic in the area. Existing sites are always blocking parking bays with building bags & planks. The large delivery vehicles block the narrow HR causing many an unpleasant confrontation.

- Construction Management Plan (CMP) & Construction Design Management (CDM File):

It is presumed that many of the above matters would have been identified & analysed as part of the process carried out using the CDM assisting the formulation of the CMP.

There are few additional aspects that also immediately come to mind:

1. No daylight sunlight report: The applicant has not provided a 'Daylight / Sunlight Report' which would highlight any issues with regard to HC & its neighbours on HR, BPG & Belsize Grove- No supporting comment.

2. Loss of sky viewed & natural light: It is observed that after completion, the additional 3rd floor may well reduce what is currently enjoyed by some flats located on the northern wing of the block. It would appear that there will be a significant loss of sky viewed and loss of natural light- south west, midday to evening.

3. Existing roof top services: The application has ignored the existing roof top services- water tank, boiler chimney & distribution. Temporarily the building cannot function without them. The proposals have not indicated any reinstatement on any drawings or render?

PLANNING APPLICATION INFORMATION:

- Omitted application information:

Noted that the following information was not submitted as part of a full application as referred to in the applications covering letter dated 27.07.2021:

1. Dwg No 003 Existing Site Plan.

2. Construction Management Plan.

3. In addition, there is no existing Roof Plan to indicate the water tank, boiler chimney and roof top service distribution.

- Information submitted as part of the Application:

- Application of artistic:

1. The existing elevation 005 and 006 are graphically treated entirely different to the proposed elevations 014 and 016. The drawings cannot truly be compared as this changes distorts the way the building is visually read. The existing displays simple brickwork & render, whilst the proposed indicates no brickwork, but introduces dark grey bands of shadow making the 3rd level look lighter. The dark shadows try to and fails to tie the buildings together as it is not a true representation. It should also be noted that HC never gets projected shadows as indicated on the drawings.

2. It is not possible to see the proposals in true setting as materials are not truly represented in monochrome drawings. It can clearly be seen from the 'DSA' renders that proposal would be visually heavy & architecturally over complex in relation to the existing building. It certainly would not be a positive addition to HC & the conservation area.

- Existing HC services not Indicated:

Both the existing dwg No's 005 & 006 and proposed elevations dwg No's 014 and 016 do not indicate the water tank, boiler flu, SVP's & RWP's, which are quite a feature on the building. The 3rd floor would have the existing SVP's extended above new window heads. The water tank / flue is omitted and needs reinstatement

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as it would form a prominent local 4th level structure. Where are these installations? Drawings & renders have omitted these entirely.

• Information that would be Expected / Comment:

1. Detailed Elevation Bay Study': As previously mentioned as you would have thought there would have been some form of sectional / bay study. This would provide evidence of the proposed construction, materials & heights / levels. Without inclusion as part of the planning application the proposals heights can easily increase and details change well beyond the outline currently drawn.

2. Section 017 Proposed Section: It can be seen from the section the profile of the roof is not a mansard. It is a sloping roofline with a flat roof that is surely not true as described in the application. As stated above it is noted that in general the applicant has not confirmed finished levels which can easily rise after any application gains approval.

3. Daylight / Sunlight Report: Impact on HC, HR, GR, BPG & Belsize Grove.

4. Acoustic / Noise Report: Impact during the construction and when in occupation.

5. Structural Statement: Has an assessment been undertaken with inspection with holes to assess existing structure against proposals (foundations, wall and roof?).

Part No 2: 2021/3839/P: OBJECTIONS / CONSTRUCTION MANAGEMENT PLAN (uploaded 27.10.2021):

As stated above the timing of the CMP was later compared to the main application submission and not many comments would have been received, as the main application was up-loaded on 10.08.2021 whilst the CMP was uploaded on 27.10.2021.

The summary below are extracts taken from previous comments and objections, refer to 2021/3839, that were posted 08.11.2021.

CMP SUBMISSION TIMING:

It was prepared in March 2021, listed in the planning statement (27.07.2021), omitted from the main submission uploaded on 10.08.2021 and finally appeared on 08.11.2021. Many objectors would have not noticed or had time to question or provide comment as this was a few days before the original public consultation was due to close.

THE DOCUMENT:

The Document was listed as a Draft Working Document' suggesting that the application had not been sufficiently technically developed, identifying what impact the application would on the building, it's occupants, neighbours both during construction and when completed.

In general, there are large sections of the CMP that refer to being 'clarified after any potential planning approval when a contractor would be appointed', whilst other sections stating they will comply with legislation without any specific resolution to HC and the neighbourhood. The reader should refer to the section 'Environmental'.

TIME FRAME:

This appears to be out of sync, planning permission 1st, contractor appointment followed by public liaison. Surely, the applicant should have carried out occupant and public liaison as strongly advised by the Camden Planning and listed in the CMP.

SITE:

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				<p>The original comments are still relevant. However, the works programme would be for more complex due to the alteration in the proposed construction, now masonry. There is still no account of the impact on the existing services, disruption and modification? How are the proposed flats services connected to the existing or are entirely new external one required on the façade?</p> <p>COMMUNITY LIAISON: The CMP states, 'A neighbourhood consultation process must have been undertaken prior to submission of the CMP first draft' and that 'This must be taken in the spirit of cooperation, rather than one that is dictatorial and unsympathetic to the wellbeing of local residents and business'. As HC is an occupied building the inhabitants should be included in this process- NO CONSULATION WAS CARRIED OUT.</p> <p>ENVIRONMENT: The following items are just extracts from the CMP which have not been answered and are pushed down the line as stated above in 'Document'. These are very important as HC is a 24hr occupied residential building. By the time their impact is known, it will be too late for the occupants to criticize and protest.</p> <ul style="list-style-type: none"> - List all noisy operations. - Confirm most recent noise survey. - Noise and vibration levels out of the work - Construction demolition. - Monitoring noise, dust and vibration (the general sensors are located at the plots perimeter, what about the occupants? - The GLA's level of dust impact. As above. - Asbestos survey and findings

2022/3635/P	Martin Shenfield	01/11/2022 11:59:49	OBJ	<p>Please note that the objection that I just posted appears on the copy emailed back to me as from Martin henfield and not as it should be Martin Shenfield.</p> <p>Furthermore I note that it states that: "Comment Type is Comment" - this may have been my fault in completing the form and hence please note that this is an actual objection.</p>
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2022/3635/P	The Belsize Society by Tom Symes	03/11/2022 10:26:41	OBJ	<p>Objection to Planning Proposal for Howitt Close, NW3 4LX 2022/3635/P</p> <p>The Belsize Society strongly objects to the proposal to add an additional attic storey to the very attractive and important block of flats at Howitt Close. 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:</p> <ul style="list-style-type: none"> • Howitt Close is identified in the Belsize Conservation Area Statement as one of the 'BUILDINGS AND GROUPS OF BUILDINGS THAT MAKE A POSITIVE CONTRIBUTION TO THE CONSERVATION AREA' • A number of buildings are notable because of their value as local landmarks, or as particularly good examples of the local building tradition. Such buildings, whilst not statutorily listed, are nevertheless important local buildings in their own right and make a positive contribution to the character and appearance of the Conservation Area. The general presumption should therefore be in favour of retaining such buildings. Although not listed, the Government requires that proposals to demolish these buildings should be assessed against the same broad criteria as proposals to demolish listed buildings (PPG15, paragraphs 3.16-3.19). Howitt Close is listed as one of the unlisted buildings which make a positive contribution to the special character and appearance of the area. • The Belsize Conservation Area retains much of its architectural integrity. Generally, despite the imposition of the motor car into the public realm and the insertion a scattering of buildings from the second half of the 20th century within the Conservation Area, the majority of the area retains the essence of the character and appearance that would have prevailed in the 1930s. • The majority of applications for planning permission within the Belsize Conservation Area involve minor alterations and extensions to existing dwellings. This can have a cumulative impact on elements that contribute to the character and appearance of buildings, streets and areas as a whole. The most noticeable changes within the area often result from one or more of the following: Roof extensions - particularly the addition of overly large, inappropriately proportioned dormers, and the addition of mansard roofs Alteration to, or replacement of windows, porches, doors, and other features. This includes the use of inappropriately scaled and detailed modern doors and window frames, in unsuitable materials Addition of roof terraces or balconies. The key issue being roof terraces with inappropriate railings that are prominent in the street scene Inappropriate design and materials Loss of original features. (The classical ornamentation on the villa development and terraces has been particularly susceptible) Extensions of excessive bulk, massing or height • In the Belsize Conservation Area Statement, London Borough of Camden says: 'Planning permission is required for extensions and alterations at roof level. 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 and the roof is prominent, particularly in long views <p>Belsize Society believes that the current proposals, which change the shape and form of the roof, will have a harmful impact on the Conservation Area. They are unacceptable because 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</p>

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Camden should refuse the application.

The 20th Century Society has objected to the proposals set out in this application and in addition has, along with the Belsize Conservation Area Advisory Committee and the Heath and Hampstead Society, strongly supported the application made by Belsize Society for Howitt Close to be Locally Listed. Howitt Close meets all of the requirements required for a Local Listing. That application is currently awaiting determination. Relevant extracts are set out below. It would clearly be quite wrong to determine this application before the application for Local Listing has been dealt with.

Howitt Close meets all of the four criteria set out in Camden's requirements for Local Listing.

Criteria 1 - Architectural significance. The building comprises two red brick storeys topped with a white roughcast one, with both the red brick and white roughcast mirroring the materials of the Edwardian houses across the street. The pale storey above two darker brick storeys appears to diminish the height of the block. 'Setbacks' and tripartite main windows are used to divide it visually into vertical sections that approximate to the width of the houses in the vicinity so that, from afar, the mansion block can be mistaken for a terrace of houses. The flat roof, coupled with the deep eaves, are distinctive and attractive features of Howitt Close. "It is considered to be a complete composition of considerable charm which, through good design suits its context well."

The building is almost unaltered externally and internally in its common areas since it was built in the 1930s. The building was designed by Henry F Webb & Ash LLRIBA, an architectural partnership that designed several significant and attractive buildings during the partnership's short existence from 1930 to 1934, including the Ambassador Cinema, Hendon, NW4 and West Heath Court, North End Way, Golders Green, NW11. Individually, both architects went on to have successful careers designing many attractive and prestigious buildings. H F Webb designed Elm Park Court, Pinner, constructed in 1936 and now Grade II listed. Elm Park Court is considered one of the icons of the modernism characteristic of 1930s 'Metro-land.' Mansion blocks designed by A S Ash include Norland Square Mansions, and locally, 99 Haverstock Hill (now called Stanbury Court), in overtly Art Deco style: a "handsome building in a style uniquely of the twentieth century...with its horizontal paned windows wider than they are long, smooth white surfaces, rounded corners and flat roofs".

Criteria 2 - Historical Significance. Howitt Close was built 1932-1934 and its 46 rental flats were fully tenanted by April 1934. The original plans for the building were titled 'Proposed Block of Small Type Flats' and it had "two types of flat- bed-sitting room flats, with a bed-alcove measuring 7 ft. square and a living-room approximately 20 ft. by 12 ft, and a series of two-room flats. The flats were fitted out with electric or gas cookers, and modern baths with shower attachment. Refrigerators, 'Easiwork' cabinets and wireless are installed in every flat". It had a restaurant from the very beginning on the lower ground floor. The Howitt Close flats were intended to provide compact living spaces for the middle classes. Its construction dates between 1932 and 1934 mean that it was contemporaneous with the Grade I listed Isokon flats on Lawn Road, a project "to design an apartment building and its interior based on the principle of affordable, communal and well-designed inner-city living... aimed at intellectual, working middle class people". Howitt Close was in the vanguard of offering suitable accommodation - affordable, communal and well-designed - for younger, single people in Belsize Park, an initiative that had wide appeal and led to Belsize Park becoming bedsit land in the second half of the twentieth century: "Since 1945 Belsize Park has been something of a synonym for bedsit land."

Criteria 3 - Townscape Significance. The townscape is integral to the Belsize Conservation area as a whole, and to the Glenloch sub-area in particular: "This is a distinct area of Edwardian terraced housing developed by the Glenloch Insurance Company close to Belsize Park Underground Station and Haverstock Hill. There is a clear change in character on entering this area from both Belsize Avenue and Belsize Park Gardens from the

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larger, grander, villa development to more modest family housing of a much smaller scale and tighter grain. These streets fall at a constant gradient to Glenilla Road which is flat. The houses along Glenloch, Glenmore and Howitt Roads are two storey red brick terraces with a basement and an attic storey within a slate-faced mansard."

Howitt Close is the only mansion block in its immediate vicinity and the site is prominent, being adjacent to a T-junction and situated on a curve in the road, which 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 freestanding, set apart from surrounding buildings, and potentially highly visible. Due to the skilful and unique architectural design described above, this mansion block appears as a well-proportioned and not over-dominant building that relates harmoniously to the earlier Edwardian terraced housing in the neighbouring streets.

Criteria 4 - Social Significance. Howitt Close was contemporaneous with the Isokon building and the impetus behind it was similar. Both buildings are clearly products of the 1930s and Howitt Close, with its contrasting architectural style, provides context for the dramatic modernist style of the Isokon flats. Without good comparable examples like Howitt Close, the significance of the Isokon flats cannot be fully understood
COMMENTS ON THE CURRENT APPLICATION

The current application is a rather desperate rehash of the application submitted last year which was correctly refused by the Council. In the Addendum to the Design and Access Statement a series of iterations of the original very poor design are presented and the Addendum appears to acknowledge that the iteration being applied for can only be described as the 'least worst!' For the Applicant to say ' The addition of a new attic storey to the original 1920's [It was built in the 1930s] will give it a greater presence more befitting its location whilst being comparable to the surrounding context' is clearly nonsense and cannot justify severely damaging a well preserved unique important 1930s building of considerable architectural merit and significance. The bulking-up of the building by the addition of an extra 'attic 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, maintaining its architectural integrity over the best part of a century. 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. 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 'attic storey' 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.

Camden Council in its 12 May 2020 preplanning advice to the applicant acknowledges the architectural skill, integrity and appropriateness of the building in its present form:

"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

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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 same document goes on to describe the adverse effect of any alterations to the building's height: "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... 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."

The Applicant has lodged a Heritage Statement Addendum and a Heritage Technical Note with its application. One of Belsize Society's members has considered these documents in detail and has made a separate objection to the application. and her comments are as follows:

'I refer to the Applicant's heritage consultants Cotswold Archaeology's 'Heritage Technical Note' which purports "to provide further research and background on the architecture firm that constructed the building (Henry F. Webb & Ash) and assess the building according to the architect's credentials and other identified works of note". It is clear from my own research at the RIBA Library that the Note is inadequately researched and its attempts to denigrate the architects and thereby diminish the importance of Howitt Close disregard the historical context. Its conclusions are irrational and unsustainable.

The Heritage Technical Note implies that the route to practising as an architect was the same in the early decades of the 20th century as it is in the 21st century and that passing the examinations to become an associate member of RIBA was an all-important step before being recognised as a professional architect. In fact, a century ago, RIBA was not the only society for architects and additionally many architects chose not to affiliate with any society. There were varied routes that an individual could follow to become an established, respected professional architect. Only in 1931 and 1938, after decades of lobbying by RIBA, was a legislative requirement (regarded as very controversial at the time) introduced for architects to formally register with ARCUK before they could describe themselves as 'architects'. The licentiate class of membership was first opened from 1908 to 1913 to increase RIBA's membership by drawing in experienced practising architects, who were either members of the Society of Architects or were unattached independent practitioners. Licentiate membership was reopened for a limited period after 1931, again to allow experienced architects in practice, with proven expertise, to join the RIBA.

The attempt by the Heritage Consultants to dismiss the gifted architects, H F Webb & Ash, because of their RIBA status is simply wrong. By the same logic, Cotswold Archaeology would dismiss many of the titans of modern architecture, such as Frank Lloyd Wright (1867-1959), Le Corbusier (1887-1965) and Mies van der Rohe (1886-1969). All of these were contemporaries of Webb and Ash and none had formal architecture training and qualifications. Closer to home, indeed in Belsize Park, Wells Coates (1895-1958) who designed the Grade I listed Isokon Building (the Lawn Road Flats) between 1929 and 1932, studied engineering and had no formal training in architecture, although he was elected as FRIBA in 1934. The Heritage Consultants' contention that the merit of buildings should be judged according to the formal architectural qualifications of their designers is completely unsustainable. Cotswold Archaeology would presumably argue that all the buildings designed by Frank Lloyd Wright, Le Corbusier, Mies van der Rohe, and Wells Coates are not worth preserving because their architects had not passed their ARIBA exams or equivalents!

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The summary biographical information in the Appendix set out in the Belsize Society's members' objection clearly shows that both Webb and Ash undertook rich and diverse training and experience, including studying under FRIBA principals, in the UK and internationally, all relevant to the design and construction of buildings. It should be noted that World War I (1914-18) at best disrupted the careers and at worst ended the lives of a generation of younger men. HF Webb was on war service from 1915 to 1918 and Major AS Ash served from 1914 until 1919. Some years later, the depression of the 1930s was a lean era for building and many architects were unemployed: it is testament to the high reputation and skills of H.F. Webb and Ash that they were engaged to design a series of buildings during this period when construction work was scarce.

The partnership of Henry F Webb & Ash was in existence for a relatively short period from 1930 to around 1934 but they were responsible for designing several significant and attractive buildings, as listed in Appendix A. Of the five buildings identified, the Ambassador Cinema, Hendon, NW4 is included in 'Played in London,' a 2014 English Heritage directory of historic sporting assets in London, endorsed by Historic England in 2015 as "focused on buildings and assets that research has shown to be of historic or architectural interest." West Heath Court, North End Way, Golders Green, NW11 is locally listed by LB Barnet for its architectural interest, on the grounds of aesthetic merits, group value and intactness. In the category 'landmark buildings and structures' it is described as a 'fine building' in Golders Green Town Centre Conservation Area.

Individually, both architects continued to have successful careers designing many significant and prestigious buildings. H F Webb designed Elm Park Court, Pinner, constructed in 1936 and Grade II listed. Elm Park Court is considered one of the icons of the modernism characteristic of 1930s 'Metro-land.' According to the Twentieth Century Society, Howitt Close "serves as a useful companion to Webb's well-known development from the same time, Elm Park Court, and many of the architectural pre-occupations are evident in both developments."

Mansion blocks designed by A S Ash include Norland Square Mansions, Norland Square, W11, which is adjacent to the listed terraces in Norland Square: "The mansion block does not replicate the architecture of the listed terraces... Nevertheless, the three main bays with their paired, vertical groupings of windows and balconies give the façade a balanced, ordered appearance in keeping with the general visual character of the square." Under the Norland Neighbourhood Plan: "changes should not involve raising the roof line, or developing any roof terraces which would clutter the existing roof line... alter the current design in terms of fenestration, balconies, bay windows, and painted versus brickwork panels."

Locally, A S Ash was the architect of 99 Haverstock Hill (Stanbury Court), in overtly Art Deco style, which is well-appreciated in the neighbourhood and widely regarded as an exemplar of the 'Streamlined Moderne' style. It is described as a "handsome building in a style uniquely of the twentieth century... with its horizontal paned windows wider than they are long, smooth white surfaces, rounded corners and flat roofs."

After World War II, A S Ash was much in demand as an architect for the Government project to build numerous blocks to serve as government offices. In 1956 and 1957, he was chosen as the architect for two highly prestigious buildings: in 1956 the rebuilding of Haberdashers' Hall in Gresham Street, the first livery hall to be rebuilt after WWII and opened by the Lord Mayor, and in 1957 Hulton House in Fleet Street, the elegant headquarters for Hulton Press.

The Applicant's Heritage Technical Note dated January 2022 lacks historical accuracy, substance and credibility and as such should not be used to justify the inappropriate development of Howitt Close. It would be perverse to base the planning decision on Cotswold Archaeology's reports, to the exclusion of the views of respected heritage bodies, such as the 20C Society, the Belsize Society, Belsize CAAC and the Heath & Hampstead Society.'

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

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disagrees with the statements in the Heritage Statement Addendum that "The impact on the Character and appearance of the Conservation Area will be neutral' and 'the impact on the building will be neutral'. It considers that the flat roof, coupled with the deep eaves, comprise distinctive and attractive features of Howitt Close. It is obvious from the iterations shown in the Addendum to the Design and Access Statement that the 'attic storey' will be highly intrusive and damaging. The building in its present form is highly valued in the neighbourhood and the addition of a fourth 'attic storey' 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 an 'attic storey' 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 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.

Belsize Society notes that the applicant has refined its proposal on many occasions to try to make it less obtrusive. It is clear from the illustrations in the original and the new application that it is impossible to make a proposal of this kind acceptable in design terms, an attic storey will ruin the subtle gentle appearance of the existing building design.

Historic significance of Howitt Close

Howitt Close was constructed between 1932 and 1934.

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.

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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 in 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.

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 Locally Listed, highly valued and rightly appreciated for its distinctive architecture and its well-preserved authenticity, leading to full 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.

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2022/3635/P	Kevin Cumiskey	03/11/2022 12:54:42	OBJ	<p>We live at 62 Howitt Road so one of the two houses that directly faces Howitt Close. The idea of adding another whole floor to an already substantial building is not something we want to entertain. We already have limited sunlight and an additional level would almost wipe out what little light we get and as such we are strongly against such a plan. We have lived in this house for almost 20 years and this extension would massively impact our day to day enjoyment of our property and as such we strongly object to its going ahead.</p> <p>Parking in the area is challenging and adding however many new tenants is just going to worsen it a great deal.</p> <p>The building is very much in tune with the character of the local area and we would like this to be maintained - I understood it needs to be maintained!</p> <p>I have read many comments from the tenants who talk about the treatment they already get at the hands of the freeholder and it does not augur well for adding to the strain.</p> <p>Howitt Road is not an easy road to navigate at the best of times but the amount of upheaval this would add does not bear thinking about. Our house already has a high degree of cracking on the walls, even if fixed regularly, and I can only think this will be much worse if you try to add a whole new top floor to the large building opposite.</p> <p>This plan should be stopped in its tracks and not brought up again.</p>

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2022/3635/P	Jeanne Golay-Evans	14/11/2022 19:39:37	OBJ	<p>The proposed development should not be given planning permission as it is not significantly different from the previous one in 2021, to which planning permission was refused. The fundamental reason for refusal, as noted by Camden in its decision of 3 August 2022, remains just as valid a reason for rejecting the current proposal, namely the 'proposed roof extension, by reason of its (...) bulk, massing, height, (...) and undue prominence, would compromise the form, character and appearance of the street scene and Belsize Conservation Area'. It would be contrary to Camden's policies for design and heritage.</p> <p>The proposal should be rejected also on other grounds. The disruption and congestion imposed on the narrow streets of the area while construction takes place would be an intolerable burden on existing residents and users of Belsize Park. The developers, despite repeated invitation to do so, have conspicuously failed to consult Howitt Close residents and their neighbours. This does not bode well for their approach if they were able to start building. Moreover, the disturbances and congestion would continue after the building was finished as the occupiers of the new flats are likely, between them, to own more than a dozen of cars. Even if these will not qualify for residents' parking permits, they will be parked in the neighbourhood outside the controlled parking hours, adding to congestion in a neighbourhood that is already of high density.</p> <p>Another ground for refusal is that it is not believable that the proposed luxury flats on a fourth floor would not require lifts, for which retrospective applications would be made, which would further damage the roof line of Howitt Close and Howitt Road, not to mention damaging the integrity of the internal arrangements of Howitt Close. The proposal claims not to reduce green and open space areas but the construction process will destroy the existing green area, where a cabin will be installed for the duration of the building work. Also, the provision of more waste collection facilities and bicycle housing (if still intended) will be at the expense of the green open space currently available. It is of concern that the construction management plan states that trees outside Howitt Close have already been trimmed in anticipation of planning permission being granted. The construction management plan also anticipates that all the building traffic, heavy vehicles, skip, etc. would travel along England's Lane. This is unacceptable as England's Lane is already a very busy road, used in both directions by the C11 bus route, where vehicles have difficulty passing and where pedestrian amenity on the pavement, including access to shop and several outdoor eateries, would be severely curtailed by heavy construction traffic.</p>

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2022/3635/P	Dr Françoise Shenfield	01/11/2022 10:48:46	OBJ	<p>Reason 1 of the Refusal Reasons for Planning Application - 2021/3839/P states:</p> <p>∩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.∩</p> <p>An examination of the latest planning application clearly shows the minimal change to the scope of the original design. The build will still overlook other homes, causing a serious loss of privacy. The build∩s appearance will still be out of character with the existing property.</p> <p>Overdevelopment: It impacts on highway safety remains the same. The negative effects on nature conservation remain the same.</p> <p>Once again, a development of this size needs to be assessed on a highly localised level not in a borough wide context. The applicants once again fail to undertake this.</p> <p>It is clear that the ∩revised∩ proposal would have a significant effect on the local environment by virtue of nature, size and location. Very little has changed with the new application and hence the Council is obligated to come to the same conclusion of refusing this application.</p> <p>Thanking you for your consideration.</p> <p>Françoise Shenfield</p>
