

Objection to Planning Proposal for Howitt Close, NW3 4LX 2022/3635/P – Addendum 22nd December 2022

The Belsize Society has lodged an objection in November 2022 to the second application (2022/3635/P) to construct seven flats on the roof of Howitt Close. This Addendum to the Society's objection is made because Camden has advised the Society that the Council has already identified the building as a positive contributor within the Belsize Conservation Area Statement. Camden has confirmed that this means that the building is considered an undesignated heritage asset within the Conservation Area and is offered protection. It is treated in the same way as if it is locally listed.

Since application 2022/3635/P was submitted, the research carried out by a number of objectors has shown that contrary to the suggestions made in the Applicant's Heritage Statement Addendum and Heritage Technical Note, the subject property was designed by architects who were responsible for many very important projects in the inter-war and post-war years. Details of this research are set out in the Society's objection. This is a very important building, being one of the very few examples of the architects' work that remains unaltered.

As evidenced by the objections lodged by the Twentieth Century Society, the Belsize Conservation Area Advisory Committee, the Heath and Hampstead Society and many others, there is great concern that the proposals will cause very significant harm to this designated heritage asset. The Camden Council officers report on the original application in 2021 (2021/3839/P) said in recommending refusal 'Paragraph 199 of the National Planning Policy Framework (NPPF) guides that: "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance". (Para 5.3).

The new research has established that Howitt Close is of much greater importance than had been thought at the time of the refusal of the original application 2021/3839/P and therefore greater weight must be given to its conservation in considering the current application.

A number of statements made by the applicant in its Planning Statement dated 22 August 2022 are incorrect or misleading. It says:

'The scheme therefore has been designed to be secondary to the original building and sit quietly on top of the roof. The style and form of the building is simple and the overall appearance contemporary, but low key. The proposal therefore fully accords with CLP Policy D1 and LP Policy D3.' As is clear from the illustrative images of the development submitted by the applicant the design is certainly not 'low key'.

' Heritage CLP policy D1 seek to preserve and enhance the historic environmental and heritage asset and respect local context and character. CLP policy D2 requires development within conservation areas to preserve, or where possible, enhance the character of appearance or the area. It is acknowledged that the site is located within the Belsize Conservation Area, sub area 4, and that the building is identified by Camden Council as a building that makes a positive contribution to the Conservation Officer. It is also noted that the building is not included on Historic England's National Heritage List for England and does not feature on Camden's Local List of heritage assets. 'Camden has confirmed that the building has the same status that it would have it were on the Local List of heritage assets and has the same protection.

'A Heritage Statement was undertaken by Cotswold Archaeology (dated July 2021) and submitted in support of the previous application. Following the submission of that application an objection to the proposed development was submitted by the Twentieth Century Society. Specifically, the objection highlighted the contribution of the flat roof to the Conservation Area and significance of the building.' The proposed extension will remove the existing flat roof.

'The objection also identified the architects of the building as Henry F. Webb and Ash. Cotswold Archaeology undertook further research on the architects, Henry F Webb and Ash, the results of which are set out in the Heritage Technical Note. That identifies that with the exception of one building which holds heritage significance at a national level, which is Elm Park Court a Grade II listed building constructed in 1936, the architect firm was focussed principally on regional level projects within the urban extent of London. The RIBA biography of Henry F Webb records that he designed 'many large blocks of flats, cinemas and public buildings' without specifying the names of any of these. There is no mention of Howitt Close. The Heritage Technical Note therefore confirms that Henry F Webb and Ash are not significant or notable architects. As such the retention of the building in the form which they originally designed is not necessary to retain its significance. This accords with the view set out in Cotswold Archaeology's original Heritage Statement which identifies that the building is an example of 1920's/30's architecture but that "the building is not particularly innovative in its use of materials or its architectural style, thus its aesthetic appeal is primarily derived from its overall form and the use of articulation to create interest" (para 3.9, Heritage Statement, Cotswold Archaeology, July 2021). Neither the building nor architectural practice which designed the building are of such significance that alterations to the overall appearance of the building would be considered harmful in principle.' As has been made clear from the further research carried out by the objectors to the proposals, the suggestions made in this Heritage Statement about the reputation and capabilities of the architects are wrong.

'The building is not listed, either statutorily or locally, and whilst it is identified as contributing positively to the character of the conservation area, there is no reason this cannot continue once additional development has taken place.' As mentioned above Camden has confirmed that the building has the same status as if it is locally listed.

'The Conservation Officer David McKinstry provided comments on the previous application which stated that the proposal would "create a roof form more akin to the mansards of the earlier Edwardian buildings, but again this would demonstrate neither preservation nor enhancement since the interWar character of the subject site is made legible by the existing flat roof and this forms part of the historic character of the area, and has done for nearly a century". As such the proposal has been amended from a mansard roof to a simple flat roof extension. The revised proposal has also been simplified to achieve an understated design. The form and character of the existing building will remain, with all key architectural details retained. The single storey addition will represent a change from what exists currently, but in its muted form and simplistic style will not compete with the existing architectural treatment. The impact on the building will therefore be neutral with its heritage significance preserved. In terms of height it is noted that the relatively low lying nature of the existing structure and the taller neighbouring building heights means that the additional storey will not rise above existing roof heights and will not form a dominant presence in the streetscene. The proposal therefore preserves the character of the building and area and is in accordance with Local Plan Policy D1 and D2 and London Plan Policy HC1.' The images submitted by the applicant make it clear that the revised proposals will cause significant harm to the building and to the conservation area.

The Belsize Society believes that the changes to the design of the proposed roof extension made by the Applicant in the current application (2022/3635/P) do not mean that the proposed works would preserve or enhance the character of the Conservation Area and there is no serious attempt by the applicant to demonstrate that it would do so. The illustrations in the current application show clearly that what is proposed is still in effect a mansard roof. Indeed, the current application still describes the application as being for 'Erection of mansard roof extension to create 7 self-contained flats (Class C3)'. Despite the efforts by the Applicant to describe the development as being for an 'attic storey', in the Design and Access statement there are a number of references to 'dormer windows' e.g. on pages 20 and 21, and clearly this is actually an application for a mansard roof extension with dormer windows which will cause significant harm and loss to the protected heritage asset for the many of the reasons set out in the officers' report recommending refusal of the original application.

As stated in the officers' report recommending refusal of the original application, 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 public benefits from the additional luxury flats and the financial contribution to affordable housing elsewhere clearly do not outweigh the harm and loss that will arise if the current application is granted.

It is the Belsize Society's view that the reason given by officers to recommend refusal of the original application in 2021 remain entirely pertinent and we therefore set out the section on Heritage and Design (Para 5) in full below.

'5. Heritage and design

5.1. The application site is within the Belsize Conservation Area, wherein the Council has a statutory duty, under section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended), to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. The Belsize Conservation Area Statement (BCAS) (2003) identifies Howitt Close as making a positive contribution to the character and appearance of the conservation area.

5.2. Policy D1 of the Camden Local Plan seeks to secure high quality design in development which respects local context and character; preserves or enhances the historic environment and heritage assets in accordance with Policy D2 (Heritage); and comprises details and materials that are of high quality and complement the local character. Policy D2 seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets, including conservation areas. The policy notes that, in order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

5.3. Paragraph 199 of the National Planning Policy Framework (NPPF) guides that: "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance". Paragraph 202 then guides that: "Where a development proposal will lead to less than substantial harm to the

significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.

5.4. The application site is within sub-area 4 ('Glenloch') of the conservation area. The BCAS notes that this is a distinctive area of Edwardian terraced housing developed by the Glenloch Insurance Company close to Belsize Park Underground Station and Haverstock Hill. Generally, the houses in the area are smaller in scale and there is a tighter grain than elsewhere in the conservation area, where larger, grander, villa development is more common. No specific reference is made to Howitt Close in the Conservation Area Statement, other than the fact it is listed as a positive contributor. This is not to say that the building is not a significant building within the conservation area.

5.5. With regards to significance, whilst the majority of buildings in the immediate vicinity are terraced Edwardian houses and semi-detached Victorian villas, Howitt Close is distinctive as a piece of post-1918 development. Its scale and materials respect the general character of its neighbours in terms of the façade, but the form of the building reflects its inter-war construction. It appears to have been developed in the early 1930's (certainly prior to 1934 when an application was submitted for alterations to a flue) and seems to have been designed by the firm of Henry F. Webb and Ash. Although different in form from the terraces in Howitt Road, Howitt Close is not an anomaly within the wider Belsize Conservation Area. The Glenloch Investment Company which erected Howitt Close was also responsible for erecting Glenloch Court and Banff House on Glenmore Road around the same time, both of which also have flat roofs. Sussex House, on Glenilla Road, is another example of a flat-roofed housing block. Flat roofed inter-war blocks of flats are therefore part of the prevailing character of this part of the conservation area.

5.6. The existing building (which has a distinct architectural character and has remained largely unaltered since it was first built) was originally designed with two brick storeys below a white rendered third storey and a flat roof with overhanging eaves. The two-plus-one composition, with the pale storey above a darker mass below, along with the local topography whereby the land slopes down Howitt Road towards the application site, means that although the application building is a storey taller than its closest neighbours, it does not appear overly bulky or prominent in the street scene. In addition, the building has a domestic scale akin to that of the neighbouring buildings through the use of set-backs and stepped bays to break up the overall mass into smaller sections that are roughly the same width as the plots on the street. The use of red brick and render further give the building a domestic feel and help the building respect its local context.

5.7. The applicant's Heritage Statement acknowledges that the existing building “sits comfortably within its position” (para 3.16) and “the flat roof of the building contributes to its diminutive form which is visually subservient to neighbouring terraced houses, despite its greater overall size” (para 3.16). However, the statement then goes on to suggest that, particularly when viewed from the west, the building has an “unfinished appearance” due to the lack of a pitched or mansard roof (para 3.17).

5.8. Officers disagree that the existing building appears in any way unfinished. As noted above, the building was designed by a firm of architects and the flat roof was a conscious choice, most likely in order to reduce the building's prominence amongst the older properties in the vicinity. As noted at pre-application stage, officers consider the existing building to be a “complete composition of considerable charm which through good design suits its context well”. On this basis, and as explained to the applicant at pre-application stage, officers consider that it will be very challenging, though not necessarily impossible, to extend the building upwards without causing harm both to the

character and appearance of the host building itself and also the wider area, including the Belsize Conservation Area.

5.9. The BCAS sets out guidelines for future development within the conservation area. With regards to roof extensions, Guideline BE26 states: "Roof extensions and alterations, which change the shape and form of the roof, can have a harmful impact on the Conservation Area and are unlikely to be acceptable where: • It would be detrimental to the form and character of the existing building • The property forms part of a group or terrace which remains largely, but not completely unimpaired • The property forms part of a symmetrical composition, the balance of which would be upset • The roof is prominent, particularly in long views" (page 41)

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

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

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

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

5.14. The proposed mansard has been presented as making the building more contextual to its neighbours; however, it is unclear why this would be seen as a benefit as the application building would be more prominent than currently and the existing flat roof is characteristic of inter-war development and therefore aids in the legibility of the application building. Furthermore, the existing building has remained largely unaltered since its initial construction. A number of consultation responses have suggested that Howitt Close was built within the original rear gardens of properties on Belsize Park Gardens; however, historical maps don't appear to demonstrate this. It appears that the plot of land went from being a field to being a vacant site. and therefore the flat roof forms part of the established character of the streetscene and local area. In essence, the proposals neither repair nor restore any previous historical condition, nor do they help better reveal or enhance the existing historic or architectural character of the area. As such, officers do not consider that the proposed works would enhance the character and appearance of the streetscene or Belsize Conservation Area.

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