

CITY
PLAN
2019 – 2040

**ROOF EXTENSIONS
TOPIC PAPER**

NOVEMBER 2019

1.0 Introduction

1.1 Westminster's City Plan 2019-2040 sets out the council's vision to make Westminster a city of excellence in all areas.

1.2 Within the draft plan, **Policy 41 (Townscape and Architecture)** sets out our approach to integrating new architecture and design within Westminster's townscape and seeks to encourage a positive approach to extensions, recognising their potential to contribute to commercial growth and housing targets.

1.3 The purpose of this paper is to explain the approach to roof extensions, which is at parts E, F and G of this policy and the background, policy and evidence which supports this. It sets out:

- the National and London Plan policy context;
- background and evidence on Westminster's character and context which has informed the approach;
- background to policy development including issues raised through consultation;
- the content and aims of the submission draft policy and how it has responded to the above.

1.4 While some of the policy and evidence within the paper is of wider relevance, and it is recognised that all forms of extensions and infill development have an important role to play in delivering growth, this paper focuses specifically on roof extensions, both due to the potentially more significant impact of rooftop development on sensitive townscape and in response to a number of responses at Regulation 19 stage which suggested a need to clarify this part of the policy.

2.0 Background: Policy Context

2.1 In developing policy on roof extensions, the council has had regard to adopted and emerging National, London Plan and other relevant policy, strategy and evidence. Key policy references relevant to roof extensions are set out below:

2.2 The **National Planning Policy Framework (NPPF) 2019** requires development to make the most efficient use of land. **Chapter 11** notes that planning policies and decisions should: *support opportunities to use the airspace above existing residential and commercial premises for new homes and that upward extensions should be allowed where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards) and*

can maintain safe access and egress for occupiers¹. It promotes an urban design led approach to planning that requires buildings to respond to their location.

2.3 **Chapter 12** (Well-designed Places) requires good design including development that *is visually attractive and sympathetic to local character and history.... while not discouraging appropriate innovation and change such as increased densities*². **Chapter 16** requires the *conservation and enhancement of heritage assets in a manner appropriate to their significance*.

2.4 Supporting the NPPF, the **National Design Guide** sets out key characteristics of a well-designed place and in responding to local character, it notes amongst other things, the importance of roofscapes³.

2.5 Following consultation on changes to **Permitted Development rights** in 2018⁴, the government announced that a new Permitted Development right (with prior approval) will be introduced for upwards extensions. While details of how and where this may apply have yet to be announced, there is clear national drive to encourage upwards extensions where these will help deliver housing.

2.6 **New London Plan** Although yet to be adopted, the New London Plan has now been through examination and the Inspector's Report published. Draft London Plan⁵ policy D1 strongly endorses a design-led approach, with the assessment of an area's character, urban form and structure used to inform understanding of an area's capacity for growth. H2A in relation to small housing developments also requires boroughs to proactively encourage increased housing provision and introduces a presumption in favour of extensions of houses and redevelopment or upward extension of flats, non-residential buildings and residential garages. This does not apply to designated heritage assets and their settings. The Inspector's report suggests this policy should be deleted in its entirety but at the time of writing the Mayor has not responded to the report. The Plan also supports commercial intensification in particular to maintain Westminster's important role as a global office centre⁶.

3.0 Background: Understanding Westminster's Context and Townscape Character

3.1 As set out above, National and London Plan policies increasingly recognise the potential for extensions to help deliver new floorspace which can contribute to

¹ NPPF (2019) para 118 Part e

² NPPF (2019) para 127

³ [National Design Guide 2019](#) Paragraph 52

⁴ <https://www.gov.uk/government/consultations/planning-reform-supporting-the-high-street-and-increasing-the-delivery-of-new-homes>

⁵ Draft London Plan – Consolidated Suggested Changes Version July 2019

⁶ See Economy and Employment Topic Paper for fuller detail of relevant London Plan policies

growth. Roof extensions can also, however, have a particularly significant impact on sensitive views and townscape, listed buildings and conservation areas. In line with policy set out above and having regard to our statutory duties in relation to heritage assets⁷, the form and locations of such development must respond positively to Westminster's different character areas and the distinctive building typologies found across the city, and conserve and enhance our heritage assets.

3.2 In formulating this policy, we have therefore undertaken an analysis of characteristic townscape and roofscapes in Westminster. The [Heritage Topic Paper](#) provides a list of sources of evidence on the city's character and architecture. It includes a broad overview of the development and character of the city at paragraphs 4.10-4.22 and identifies as a key issue the need for design to respond to established patterns, density and scale of surrounding townscape, existing rhythms, symmetries, degree of uniformity and the composition of elevations and building lines. Our adopted Supplementary Planning Guide [Roof Alterations and Extensions](#) provides an overview of roof types on domestic buildings in Westminster and characterisation of individual areas is set out in our [conservation area audits](#), each of which includes a section on characteristic roof forms.

3.3 Drawn from these sources, more detail on characteristic roofscapes in Westminster has been included at Appendix A. This provides detail on some of the wide variety of roof forms in the city, which reflect its rich architectural history. As the city's townscape is dominated by several key waves of development and particular building typologies, it identifies certain roof forms are particularly common, noting:

- Many parts of Westminster are characterised by planned layouts or dominated by particular building types. A significant proportion of Westminster's building stock is housing laid out in terraces and groups, much from the Georgian and early Victorian eras. This tends to be of consistent scale and is characterised by uniformity of architectural character including consistent detail to roofscapes. To such terraces the unity of rooflines is particularly important to character.
- Earlier and later buildings display more variety in roof form incorporating a range of styles. Single building developments from the later 19th and early 20th century have more elaborate roof forms, with pitched roofs, pediments and gables integral to their character. Their extension can be more challenging.
- In mixed central parts of the CAZ, complex patterns of land ownership and uses tends to result in greater architectural variety and roofscapes tend to be less uniform. However, these also include groups of buildings with uniform character and are often areas of high townscape sensitivity, with significant concentrations of heritage assets.

⁷ See Heritage Topic Paper Appendix 2 for list of other relevant legislation and policy references.

- Cutting across the city, major routes such as Oxford Street, Bayswater Road, Edgware Road and the Strand predate much of Westminster's development, have undergone a greater degree of change and tend to have more mixed and commercial character and built form. The [Westminster High Buildings Study](#) identifies the influence of major 'corridors' through the city on character and Historic England in their study [London's Local Character and Density](#) have also identified such major routes as a character type 'High Roads' which offer more potential to accommodate growth⁸.

4. Adopted Policy, Reasons for Change and Development through Consultation

4.1 Westminster's adopted policy on roof extensions is set out in Chapter 10 Policy DES 6 of the Unitary Development Plan (2007). This includes circumstances where roof extensions will be resisted, and it identifies that there are some buildings where roof extensions are not appropriate - these include terraces or groups of buildings that have original unbroken or unaltered rooflines, buildings that are as high, or higher, than their neighbours, and buildings where the existing roof or skyline contributes to the character of the area.

4.2 In recent years, there has been some concern expressed by residents that existing policy, in particular as it relates to unbroken or unaltered rooflines, is too restrictive. This has led to the suggestion that this can prevent growing families from staying in the city. In addition, there is continuing pressure for growth and expansion of existing office and commercial floorspace to allow us to maintain Westminster's central position in the UK economy⁹.

4.3 Given these concerns and issues, the clear national drive to encourage upwards extensions where these will help deliver housing, and the need to maintain Westminster's important role as a global office centre, emerging policy has sought to adopt a positive and proactive approach to roof extensions, recognising that such extensions can be an appropriate way to introduce new floorspace and help meet the growth ambitions of the plan. This is particularly within densely developed central areas such as Westminster, where the opportunities for larger scale or comprehensive redevelopment are more limited.

Consultation

4.4 The policy approach has evolved through consultation. The **City Plan Informal consultation** draft (2018) initially sought to allow a single storey roof extension in predominantly residential areas and two storeys of roof extensions in

⁸ Historic England London's Local Character and Density (2016) p18

⁹ As set out in supporting text to City Plan policies 14 and 15.

commercial areas. The intent of a positive approach was welcomed, but the following issues were identified:

- references in policy were limited to the mansard roof form whereas this is not the only type of roof extension that may be appropriate;
- allowing up to one or two storeys was considered by some to be overly restrictive and others to be too permissive;
- it is not clear what a predominantly commercial area is;
- it is not clear how a growing family would be defined or why this is appropriate;
- there were requests for references to the creation of additional residential units.

4.5 As a result of these comments, further analysis of roof types in Westminster was undertaken as set out above which led to a refining of this approach to include design criteria identifying where extensions would be appropriate and setting out which geographical areas we considered to be predominantly commercial areas where larger roof extensions are more likely to be appropriate.

4.6 The subsequent consultation on the **Regulation 19 draft plan (2019)** led to 20 responses which referred specifically to the roof extensions policy. Support was expressed for the wider policy position, to the reference to providing new homes and to removal of reference to mansards, but the following issues were also raised:

- concern that area-based approach to roof extensions is not evidence based and too restrictive -commercial extensions will only be permitted in these areas but there will be buildings outside these areas which are suitable for upwards extensions, suggestion this should apply to the whole of the CAZ;
- not clear why residential roof extensions should only be appropriate for one storey and commercial two;
- policy on extensions within key commercial areas is constraining, by particularly restricting extensions to unlisted buildings.

4.7 In response, a number of [minor modifications](#) to Policy 41 have been proposed to clarify the approach and to make clear that criteria at part E do not only apply to residential areas and that appropriate commercial extensions may be permitted in any location in the city. Further detail of comments received and our response is in the [consultation statement](#).

5.0 Roof Extensions Policy in the submission draft City Plan

5.1 In line with National and London Plan policy requiring the most efficient use of land, the City Plan Spatial Strategy supports high quality design to achieve intensification and optimise densities. At paragraph 1.3 it notes the need to optimise

opportunities for infill development and extensions and at paragraph 2.6 highlights the important role of sensitive refurbishment and extension of buildings in delivering additional commercial growth; this is further expanded upon within the Commercial Growth and Economy Topic Papers. Policy 8 also notes the intention to take a more welcoming approach to roof extensions where these contribute to housing delivery.

5.2 **Policy 41** sets out our detailed approach to integrating new architecture and design in Westminster's townscape and provides specific criteria for roof extensions at Parts E, F and G. In response to the requirements of National and London Plan policy, evidence and consultation responses set out above, it encourages a positive approach to roof extensions, recognising:

- (i) the potential for upwards extensions to contribute to the efficient use of land through delivery of housing and commercial floorspace and;
- (ii) the need to ensure such development will respond positively to Westminster's distinctive character and protect heritage assets.

5.3 **Part E** positively identifies where roof extensions will be permitted, based on an understanding of distinctive local character (and does not apply specifically to residential or commercial extensions). Given that significant parts of Westminster are characterised by terraced housing of consistent design, policy criteria (1) and (2) relate to extensions to terraces or groups, as detailed below.

5.4 E (1) seeks to permit infilling of gaps within groups or terraces which already have extensions. In such areas, infilling of gaps can bring an opportunity to re-unify roofscape across groups if new extensions are sensitively designed and follow the predominant pattern.

5.5 E (2) relates to circumstances where terraces retain a uniform roofline. In such locations, the addition of one or multiple roof extensions of different designs on individual properties could cause harm to the appearance of the roofscape, and policy therefore supports proposals which take a coordinated approach adding roof extensions of consistent design to a complete terrace or group to retain unity of character.

5.6 E (3) recognises that other buildings across the city will need to be considered on an individual basis and extensions will be acceptable where design is sensitive to the particular architectural character of the building and townscape.

5.7 **Part F** Makes clear that we will encourage in principle all roof extensions which help deliver new housing and support the housing targets in the plan and positively seek design solutions which will allow us to support these.

5.8 Recognising the particularly important role roof extensions can play in delivering commercial growth, **Part G** seeks to positively identify some broad areas that are a focus for commercial growth and where larger scale extensions may help deliver this growth. The areas identified are the **Opportunity Areas**, the **International Centres** of the West End and Knightsbridge, the **Major Centre**, and

on **commercial buildings on the Transport for London and Strategic Road networks**. These are shown on the map below (Figure 1).

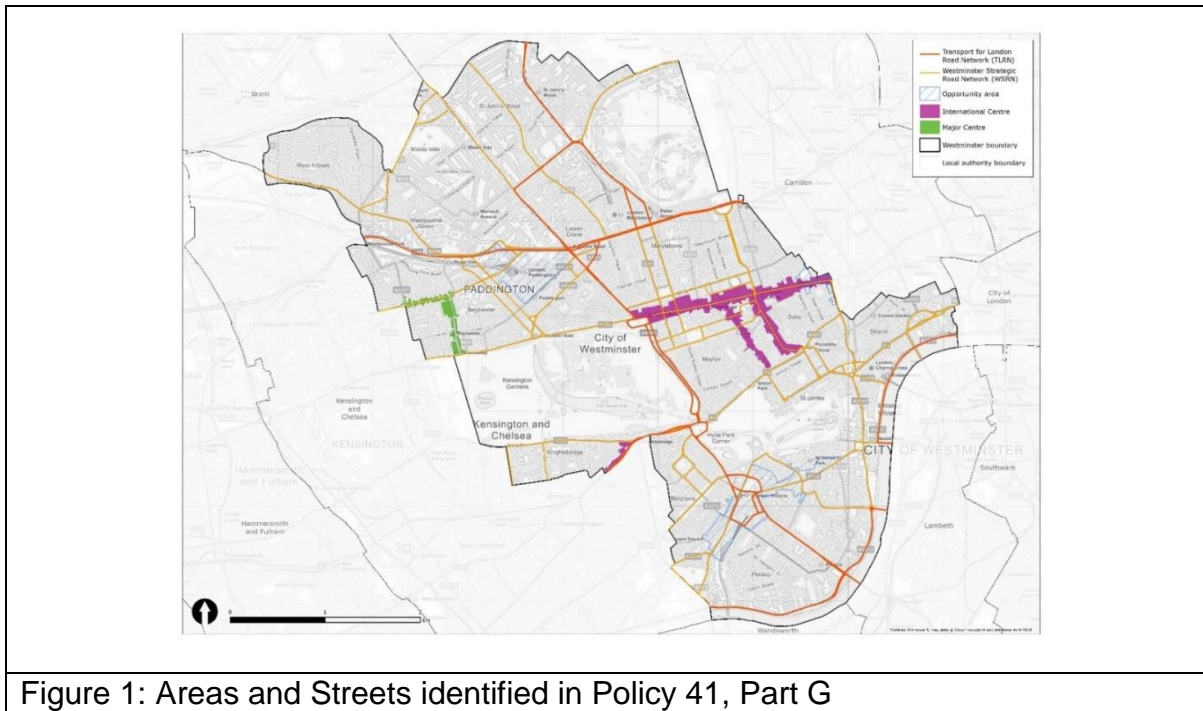


Figure 1: Areas and Streets identified in Policy 41, Part G

5.9 This is therefore focused on major routes or corridors through the city and commercial centres which we have identified as having more varied townscape character¹⁰. As set out above in paragraph 3.3, in these locations, buildings tend to be of larger scale, more varied character and therefore are most likely to have potential for larger scale extensions of more than one storey. Policy therefore includes less restrictive criteria within these areas. These also broadly align with areas considered within the Commercial Growth Topic paper as the potential focus for additional commercial floorspace.

5.10 Policy criteria and supporting text nonetheless recognise that the acceptability of extensions will depend on the site and townscape context and must have regard to our statutory duties in relation to heritage assets. As such, supporting text makes clear that not all of the buildings within areas identified will be suitable for roof extensions of one or more storey and there may be other commercial locations across the city where larger roof extensions of more than one storey can be accommodated. In other areas, commercial extensions will also be supported where they fulfil the criteria in Part E.

5.11 While it has been suggested that a more permissive approach to roof extensions should be applied to the whole of the Central Activities Zone this is an exceptionally large area of central London covering many exceptionally sensitive

¹⁰ Having regard to Historic England London's Local Character and Density (2016) study, characterisation in [Conservation Area Audits](#) and Westminster's High Building Study (2019).

areas of historic townscape crossed by strategic views¹¹ and a blanket approach to this entire area would be inappropriate, would not fulfil our statutory duties in relation to heritage assets and the broader approach in the informal consultation draft was subject to objection. It was also suggested that the criteria at part G should apply to residential extensions. However, the areas identified have a commercial focus of particular importance in supporting our commercial growth targets and, while larger scale residential extensions may also be acceptable in some instances within these locations, there are a wider range of impacts to be considered in residential schemes with potential for more significant residential amenity, privacy and overlooking issues, which make this more permissive approach inappropriate.

6.0 Conclusion

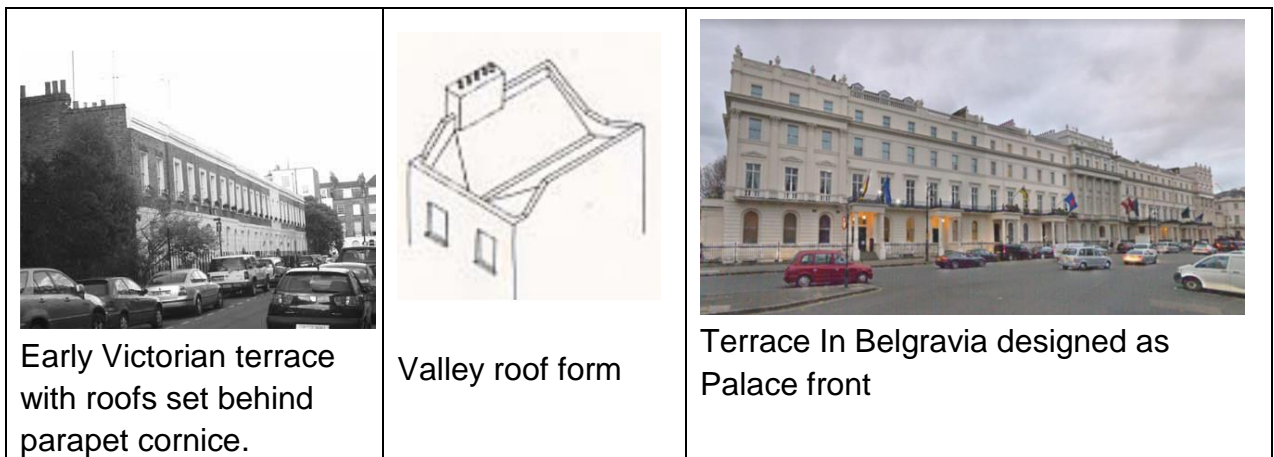
6.1 As set out above, the policy approach to roof extensions has been developed in response to national and London plan policy, local circumstances and evidence. We consider that this represents a positive policy approach which responds to Westminster specific circumstances and distinctive character and strikes an appropriate balance which will allow appropriate roof extensions, recognising their potential to contribute to our growth targets and will also protect Westminster's sensitive townscape and heritage assets. As such, we consider this is effective, justified and consistent with national policy.

¹¹ See Westminster [High Buildings Study](#) Map Figure 5.28 Combined Sensitivities.

Appendix One: An Overview Westminster's Roofscapes

Westminster's roofscapes reflect its rich architectural history and include a variety of roof forms from all eras. However, the city's townscape is dominated by several key waves of development and particular building typologies and certain roof forms are therefore particularly common.

A significant proportion of Westminster's building stock is housing laid out in terraces, much of which dates from the Georgian and early Victorian eras. Such housing tends to be of consistent scale and is characterised by uniformity of architectural character, including consistent detail to roofscapes. They are most commonly designed with low roofs hidden behind a straight parapet to maintain the appearance of the classical façade below. These were generally either butterfly roofs, pitched at right angles to the front with a central valley or double pitched, M shaped roofs. Grander terraces were often designed as one single composition or palace fronts with central and end projections marked by sheer storeys or by differing roof treatment or pediments. To such terraces the unity of rooflines is particularly important to character.



Due to their low ridge height, these types of roofs often do not incorporate habitable space. Mansards have been used extensively to extend such Georgian or Victorian buildings, as they can provide an extra level of accommodation but remain partially obscured behind the parapet, lessening the impact on the appearance of the classical façade below.

Earlier and later buildings display more variety in roof forms. Buildings from late 17th century often have more steeply pitched roofs with projecting timber eaves cornices, such as those found in Queen Anne's Gate. Regency style villas, found in areas such as St Johns Wood, were often given low pitched roofs of gabled or hipped construction with wide projecting eaves.

		
<p>Queen Anne's Gate</p>	<p>Victorian terraces with pitched roofs (Queen's Park)</p>	<p>Italianate Villas In Maida Vale</p>

Late Victorian buildings and Edwardian buildings incorporate a range of styles but tend to have more elaborate roof forms, with mansards, pitched roofs, pediments and gables which are integral to their character. These are notable enclaves of later Victorian housing such as the artisan worker's housing in the Queens Park Estate and areas with flats including mansion flats and Peabody Estate housing. Such areas often also have a consistency of detailing across groups which is important to their character.

Many single building developments dating from the later 19th and 20th centuries can be found across the city. Those dating from the late 19th and early 20th centuries often have elaborate roofscapes integral to their overall design, many incorporating distinctive detailing including turrets, gables and dormers. Modern (post war) buildings often take a great variety of architectural forms, but many have a rectilinear massing. Extensions to such buildings can be challenging and will not always be possible. Where acceptable, they will require a bespoke design response specific to the individual building type.

		
<p>Late Victorian and Edwardian roofs characterised by turret, gables, dormers and tall chimneys</p>		

While many parts of Westminster are characterised by their planned layouts and dominated by particular building typologies, in mixed central parts of Westminster, such as St James's and Soho, the complex patterns of land ownership and uses have tended to result in greater architectural variety and roofscapes tend to be less uniform. However, these also include areas and groups of buildings with uniform

character and very high concentration of heritage assets meaning this includes areas of exceptional sensitivity when considering proposals for additional building height.

As set out in the Heritage Topic Paper, cutting across the city, major routes such as Oxford Street, Bayswater Road, Edgware Road and the Strand predate much of Westminster's development and follow the line of Roman and historic roads out of the city and some leading to earlier settlements around Paddington, St Mary-le-Bourne and Ebury. These major routes tend to have more mixed and commercial character and built form. They are generally of greater width and characterised by larger scale of building than the areas set behind them and have, throughout their history, been a focus for change and growth. The High Buildings Study identifies the influence of major 'corridors' through the city and Historic England in their study 'London's Local Character and Density' have also identified such major routes as a character type 'High Roads' which offer more potential to accommodate growth¹².



The above provides only a brief overview of Westminster's complex architectural character. In updating the Design SPD and future conservation area audits, we will provide further guidance detail of how our approach to roof extensions will be applied to different building types and respond to townscape character.

¹² Historic England London's Local Character and Density (2016)

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