

3 July 2020

Ms. Charlotte Glancy
Programme Officer
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RE: 2019-2040 City Plan Draft

Dear Ms. Glancy,

We are writing with respect to the Westminster City Plan Policy revision - M/DH/29 Para 41.11 attached here and ask that our comments below be considered.

The policy from the original draft is here in blue, and Westminster's suggested revision is shown below in red:

41.11 / If properties affected form part of a group or terrace that remain largely unaltered or have a historic or distinctive roofscape integral to the architectural character of that building, further upward extension may be unacceptable, and the design of development proposals will need to be especially carefully considered. Where a terrace retains a uniform roofline with no roof extensions, the addition of one roof extension or multiple roof extensions of different designs can cause harm to the appearance of the roofscape. However, we will consider applications which would take a coordinated approach, adding roof extensions of consistent design to a complete terrace or group of unlisted buildings with a uniform roofline. Upwards extension will usually be inappropriate where a mansard or other later roof extension already exists.

M/DH/29	Para 41.11	However, we will consider applications which would take a coordinated approach, adding roof extensions of consistent design to a complete terrace or group of unlisted buildings with a uniform roofline. <u>In such cases we will require extensions across the whole terrace group to be implemented at one time and this may be secured by legal agreement.</u>	For clarity.
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We feel that Para 41.11 and in particular, the proposed revision in red is not in the public interest for the following reasons:

- I. Insisting that roof extensions across an entire group of buildings be implemented at the same time imposes an unreasonable burden of cost and cooperation among different owners, potentially thwarting many mansard developments which could add considerable housing space in our areas. As noted earlier in the City Plan, adding mansards to the many larger houses across Westminster that are currently divided into upper and lower mainsonettes can help to satisfy the housing targets by creating viable 3-bedroom family homes. Making it easier rather than more difficult to add mansards whenever possible would help to achieve these targets.

- II. Our concern extends to the practical aspects of this policy – what if one owner drops out or sells, who co-ordinates the financing, is one contractor to be expected to carry out the work, and is this a single planning application?
- III. The group or terrace is often not the important unit to be considered when evaluating the addition of mansards (or other features for that matter), but rather the pair, the street, or the square, and these designations have heritage implications. Chepstow Road in W2 is an example – a street which once had historic and architectural significance because its beautifully ornamented terraces were mirror images of one another, but whose mirror image cannot be restored because one side has mansards and the other has none - and as a listed terrace with an unbroken roof line, applications to add them would be refused.
- IV. This policy also overlooks the fact that there are already broken skylines across the City. By continuing to allow individual developments, gaps will be filled more quickly. If requiring that an entire group be developed at the same time, people who are ready to build will not be allowed to, eliminating the potential gain.
- V. We also feel that listed terraces should not automatically be precluded from having mansards due to their listed status. A proper hipped roof extension as laid out by Historic England would most likely be deemed appropriate on many of the 3-4 storey listed terraces in our areas, or another historic design specific to the individual style of the buildings.
- VI. In terms of design, we suggest that the correct place for any design considerations is in the local Neighbourhood Plans and any existing Design Guides rather than a more general City Plan. Rather than taking a blanket approach across the city, local Neighbourhood Plans will have taken into account appropriate designs for their buildings, local heritage and environmental characteristics, as well as which parts of their area are appropriate for upward development and which parts may not be.
- VII. Finally, coordinated approaches which might require matching existing adjacent models fail to ensure that the best possible example be built. Hipped roof mansards have advantages in weight, space for insulation, passive cooling, etc., over flat roofed mansards, and generally, from street level, it is the colours, materials and setback that give the desired consistency to a view of roof extensions. If a policy requires a consistent approach and an inferior model exists, that could lead to the bad driving out the good. Again, this points to the need for more localized and specific policies.

Therefore, is the view of our forums that the highlighted section of para. 41.11 and suggested revision in red should be deleted. Instead, we suggest a sentence be added that “All applications should be considered in light of policies set out in the relevant Neighbourhood Plan, specific local design guides, and where those don’t exist, *Roofs: A Guide to Alterations and Extensions on Domestic Buildings (WCC 1995)*” - provided this guide is updated to include some of the above points and any current technological and environmental information.

Thank you for considering these comments during your examination.

Yours sincerely,

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