



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

London Upward Extensions
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Dear Sirs

UPWARD EXTENSION IN LONDON

The Institute of Historic Building Conservation (IHBC) is the professional body for building conservation practitioners and historic environment experts working in England, Northern Ireland, Scotland and Wales, with connections to the Republic of Ireland. The Institute exists to establish, develop and maintain the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation. While we strongly support policies that promote the increase in housing supply in the capital, we have equally strong reservations about how the policies proposed in the consultation might undermine local character and sense of place to the overall detriment of the visual environment. Our response to the questions is as follows.

Question 1: Would greater freedom to build upwards on existing premises be a viable option to increase housing supply while protecting London's open spaces?

We are doubtful.

Why do you think so?

We have reservations about the concept of "freedom" in the question as the possibility of development of this sort has always been possible with planning permission. Upward extensions are complex developments in many cases and the process of obtaining planning permission is a minor aspect of it. What is crucial is that the developer has clear policy support for his proposal. Thus, rather than have a PD framework hedged by many provisos and conditions, a policy backing for for upward extensions in the London Plan as in Option 3 might be preferable.

Question 2: Do you agree with the proposal for a London permitted development right with prior approval, allowing the addition of new housing units where the extension is no higher than the height of an adjoining roofline, and no more than two storeys, to support delivery of additional homes in the capital?

Subject to exclusions to protect the historic environment and other public interests this is very unlikely in our view to produce a significant uptake.

Question 3: Do you agree that the proposed options for neighbour consultation provide adequate opportunity for comment on development proposals for upward extensions?

No. There is no point in consultation unless the LPA can deny consent as a result.

Question 4: What other measures could a London permitted development right contain to encourage applications for upward extensions to come forward? For example, would allowing additional physical works to provide for access, or partial or full demolition and re-build up to the height of an adjoining roofline, incentivise building up? If so, would this raise additional considerations which should be taken into account?

The difficulty with the examples given is how there might be limited in scope. Complete redevelopment will very often be the optimum outcome for non-listed buildings in London and measures that permit works approaching the scale of redevelopment without the advantages might not be very attractive.

Question 5: Do you agree that local development orders would be an effective means to promote upward extensions and contribute to the delivery of additional homes for London?

This would be preferable to the PD option 1 as it would allow LPAs to tailor the measures to their local circumstances.

Question 6: What measures should a local development order contain to encourage proposals for upward extensions to come forward?

We have no view on this.

Question 7: We would welcome the views of London boroughs on whether they consider they would introduce local development orders for upward extensions, and what might encourage them to do so?

We are not a London Borough.

Question 8: Do you agree that proposals for a new London Plan policy supporting upward extensions would provide certainty and incentivise the development of additional housing in appropriate locations?

Yes. We think this is the soundest option.

Question 9: What are your preferred option/s to support upward extensions to increase housing supply in London?

Options 3 and 2 in that order with no enthusiasm for option 1.

Question 10: Do you agree that premises in residential, office, retail and other high street uses would be suitable for upward extension to provide additional homes?

Yes.

Why do you think so?

Improving the mix of land-uses is usually better for community and public safety.

Question 11: Do you agree with the locations that should be excluded from a permitted development right listed in paragraph 3.3 above, and are there other areas where proposed upward extensions would be best managed through a planning application?

Yes, we think this is broadly right. There would need to be clarification of the expression "setting of a listed building" as this is often too narrowly interpreted as meaning "next door".

Question 12: Do you agree with our proposed approach to protect conservation areas and protected views?

Yes. But we think the measures should allow the LPA to deny consent altogether if a proposal would be detrimental to the character or appearance of the conservation area.

Question 13: Do you agree with our proposals that the property being extended upwards should share a wall with a higher property, or form part of a continuous terrace of premises being extended that shares a wall with a higher property?

Yes.

Why do you think so?

There are more complex limitations that would apply in cases where there was clear air between the properties. There may also be party wall implications that could not be over-ridden by planning controls.

Question 14: Do you agree that for a permitted development right or London Plan policy a limit of two additional storeys is appropriate to manage the impact of upward development in any area?

It would remain open to developers who thought more than 2 storeys were appropriate to apply for planning permission. A London Plan policy could also support this.

Question 15: Do you agree that a prior approval should consider the method and hours of construction?

Yes.

Question 16: Have you any views on the likely costs and benefits of these proposals to deliver additional homes in the capital?

Upward extensions are a very disruptive form of development. They can be used to deliver additional homes but because of the difficulty of such development in many cases complete redevelopment will continue to be favoured.

Question 17: Have you any views on the implications of the approaches to housing supply outlined above for people with protected characteristics as defined in the Equalities Act 2010?

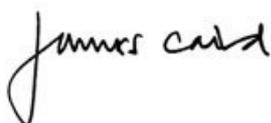
No.

Question 18: Are there any other points that you wish to make in response to this consultation, including other key components we have not considered that would be beneficial in taking the proposals forward, or any examples of upward extensions providing additional housing?

No.

We hope these comments are helpful.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird
Consultant Consultations Co-ordinator