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25/04/2024

To Whom it may concern,

RE: Formal Objection to the Redevelopment of Tavis House, Planning Reference 2024/1267/P

1. I am writing to formally register my strong objection to the planning application referenced above, which proposes, amongst other matters, substantial demolition, amendments to external rear facades, a new rooftop pavilion, rooftop plant equipment, and amendments to the overall massing of the building. These proposed changes pose significant concerns for the operations and integrity of Mary Ward House. As a key stakeholder in the vicinity, it is imperative that my objections are thoroughly considered and addressed in the planning process. The proposed alterations not only risk compromising the historical and architectural significance of Mary Ward House but also have the potential to disrupt the surrounding environment and community. I urge the planning authorities to carefully review and assess the impact of the proposed development on the heritage, functionality, and character of the area, and to prioritize the preservation and protection of Mary Ward House and its surroundings.
2. Since its inception in 1898, Mary Ward House has been dedicated to philanthropy and social well-being, making a significant contribution to society and the local community. Our central ethos revolves around the following key areas:
 - 2.1. Advancement of Education through the Establishment and Maintenance of a Grade 1 Listed Building/Museum: Mary Ward House stands as a testament to the advancement of education. As a Grade 1 Listed Building, it serves not only as a historical landmark but also as a museum of sorts, preserving the heritage and culture of our community. The building itself is an educational resource, providing insight into architectural history and design.
 - 2.2. Advancement of Education through Philanthropic Provision of Subsidized Space: We support all government bodies and charitable organizations by providing subsidized space for knowledge learning and dissemination. This includes offering affordable meeting rooms,

conference facilities, and office spaces to organizations dedicated to education, arts, culture, and social welfare. By doing so, we contribute to the broader educational landscape and facilitate the work of various charitable entities.

- 2.3. Servicing the Community: Mary Ward House is deeply committed to servicing the community. We provide space which to public sector bodies and charities which offer a wide range of services and support to individuals and groups, both within the local area and from all areas of the UK. This includes educational programs, arts and cultural events, community engagement activities, and social welfare services. Our aim is to foster community cohesion, promote inclusivity, and improve the quality of life for all residents.

- 2.3.1. As a timely example, on the date of writing (25 April 2024) the planning objection, we received the following feedback posted publicly online:

“empowerHER is a charity which provides peer based support and community to girls 24 and younger and who have been bereaved of their Mothers. Every year on Mother’s Day we hold an event for these girls to come too to be together and to be celebrated and treated on a day which can feel quite isolating. We serve girls and families from all areas of the UK and all backgrounds, with no cost to the families. We were so lucky this year to be able to hold this event at Mary Ward House in Bloomsbury who donated their main hall as well as staff for the day to host and support our event. The space is stunning, and was perfect for girls coming in from across the UK to Euston station. The girls took part in crafts, sharing activities, vision boards and yoga, I have no doubt of the impact that the day retreat which we held at Mary Ward House will have had in these in reinforcing the message that they are not alone.”

3. Given the historic significance of Mary Ward House, we are deeply concerned about the potential impact of nearby construction work on our operations and the heritage of the area. The noise and disruption caused by the demolition and construction will be ruinous to our ability to continue the Historic Use and to continue serving the community effectively and fulfilling our aims¹. Mary Ward House has long been a vital hub for our community, providing essential services and preserving a piece of our shared heritage. Any interference with its operations risks undermining not only its historical integrity but also its ability to function as a cornerstone of our community. It is imperative that measures are taken to mitigate the impact of nearby construction activities on Mary Ward House, ensuring its continued operation and preservation for generations to come.
4. The proposed development, if allowed to proceed, will undoubtedly disrupt our operations for an extended period, leading to significant inconvenience and financial losses. This is not merely a matter of noise and vibration; it is far more nuanced due to the fact that we are dealing with a grade 1 listed building whose Historic Use will be severely compromised. We must consider how our patrons and the public will perceive a massive demolition and construction site adjacent to such a culturally significant landmark. There can be no doubt that any right-thinking member of society will simply not want to utilize Mary Ward House for education and communication amidst such disruption. Moreover, the length and impact of the construction have not been adequately addressed, raising serious concerns about the potential disruption to our activities and the safety of our patrons and staff. These concerns are exacerbated by the fact that the Construction Management Plan submitted as part of this application was designed to deal with a different planning proposal, further highlighting the lack of consideration given to the unique circumstances surrounding Mary Ward House. It is imperative that these concerns are addressed comprehensively before any further steps are taken towards approving this development.

¹ <https://www.marywardhouse.com/servicing-the-community>

5. Furthermore, the potential impacts on daylight, sunlight, and Listed Architectural Features have not been sufficiently addressed in the application. These factors are critical to preserving the setting of a listed building and must be given due consideration in any planning decision. The alteration of natural light conditions can profoundly affect the ambiance and aesthetic value of Mary Ward House, compromising its historical significance, architectural features and visual appeal. Additionally, any changes to Listed Architectural Features risk diminishing the architectural integrity and authenticity of the building, undermining its status as a cherished cultural asset. It is essential that these concerns are thoroughly evaluated and addressed to ensure that any proposed development respects and preserves the unique character and heritage of Mary Ward House for future generations to appreciate and enjoy.
6. The design and heritage impact of the proposed extensions and massing also raise significant concerns. Mary Ward House is a building of historical and architectural significance, and any alterations must be carefully evaluated to ensure they do not compromise its integrity or detract from its heritage value. Any proposed extensions and massing should be harmonious with the existing architecture, respecting the building's unique character and contributing positively to its overall aesthetic and cultural importance. It is imperative that thorough assessments are conducted to understand the potential impact of these extensions on the historic fabric of Mary Ward House and to ensure that any proposed changes uphold its heritage value for present and future generations.
7. Additionally, the adequacy of noise protections from the proposed roof terrace and plant machinery has not been adequately demonstrated. Given the residential uses in the vicinity, it is essential that measures are in place to mitigate any potential noise disturbances effectively. The introduction of a roof terrace and plant machinery has the potential to generate significant noise pollution, which could disrupt the quality of life for nearby residents and compromise the peaceful coexistence of residential and commercial activities in the area. Therefore, it is imperative that robust noise mitigation strategies are implemented to ensure that the proposed developments do not result in undue disturbance to the surrounding community. These measures should be carefully evaluated and clearly outlined in the planning application to provide assurance that the interests of all stakeholders, including nearby residents, are adequately protected.
8. We are particularly disappointed and concerned at the lack of engagement from the applicant throughout this process. The failure to engage, consider and address the concerns of key stakeholders, including Mary Ward House, undermines the credibility of the application and the integrity of the planning process.
9. The clandestine approach taken [REDACTED] in pushing through Planning Ref 2021_6105 (during Covid Restrictions) and attempting to do the same with this planning application has left us feeling completely blindsided and disrespected. Their covert maneuvers highlight a clear disregard for transparency and meaningful engagement with stakeholders. By avoiding open dialogue and resorting to deceitful tactics, they have not only compromised the integrity of the planning process but also neglected the concerns and interests of those impacted. Such blatant disregard for due process and accountability is unacceptable, and it is essential that [REDACTED] are held responsible for their actions. Immediate rectification of this situation is demanded, along with a commitment to genuine and transparent engagement moving forward.
10. The content of this letter is based on our own work. We have limited resources and access to planning consultants. We would implore the Local Planning Authority to review and consider this formal objection on that basis and try and understand the general points we are making where we have understood the nature of the legislation or policies.
11. We kindly request that the council carefully consider the implications of the proposed development and take measures to mitigate its impact on Mary Ward House and its surroundings. We are open

to discussing alternative solutions that would minimize disruption while allowing the planned construction to proceed.

12. Thank you for your attention to this matter. We appreciate your commitment to preserving the heritage and vitality of our community.

National Planning Policy Framework (NPPF)

13. Paragraph 200.

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary."

- 13.1. The Applicant has failed to describe the significance of Mary Ward House Ltd, including the contribution it makes to the setting of the conservation area. The level of detail provided by the applicant is in no way acceptable. Critically, it fails to address the primary architectural and historical reasons for the listing.
- 13.2. Mary Ward House, completed in 1898, was designed to be a settlement house for women in need. The building's purpose was to provide a space for educational and social activities, empowering women and improving their living conditions. Smith and Brewer's design for the Mary Ward House reflects their commitment to merging modern functionality with a deep respect for the past.²
- 13.3. Perhaps one of the most remarkable features of the Mary Ward House is the use of large, expansive windows. This was a novel approach at the time, allowing for an abundance of natural light to flood the interior spaces. The careful placement of these windows not only improved the quality of life for the women using the facility but also added a sense of modernity to the design³⁴. They play a pivotal role in both the architectural features and the historical use of the building for lectures and education..
- 13.4. Dunbar Smith and Cecil Brewer were architects ahead of their time, known for their innovative designs that seamlessly blended traditional and modern elements. Their collaborative work on iconic buildings like the Mary Ward House in London showcases their commitment to architectural excellence and their dedication to creating spaces that are both functional and aesthetically captivating.

² Mary Ward House Trust

³ Mary Ward House Trust.

⁴ Light is such a fundamental and important part of the design of building and it's been given no consideration save to say that the loss of light is acceptable. The report on light does not deal with the key features of the listing. This needs to be dealt with separately under failings to provide the necessary reports.

- 13.5. Their influence on the architectural world has left a lasting mark, and their work continues to inspire architects and admirers of design to this day. Dunbar Smith and Cecil Brewer, while perhaps not household names, are celebrated in the world of architecture for their remarkable contributions and their innovative spirit that transcends time and place.
- 13.6. Paragraph 200 of the National Planning Policy Framework (NPPF) emphasizes the paramount importance of conserving the significance of heritage assets, including their setting and historic use. The failure of the Applicant to adequately address Paragraph 200 is deeply concerning. These omissions directly undermine the requirements set forth in the NPPF to assess and articulate the significance of any heritage assets affected by the proposed development.
- 13.7. The historical functional space and use of Mary Ward House, a cherished heritage asset, are undeniably jeopardized by this application. The proposed alterations, including substantial demolition, amendments to external facades, and the introduction of a new rooftop pavilion, threaten to disrupt the integrity and authenticity of the building's historic use. Moreover, the inadequate consideration given to the significance of these heritage assets and their setting further exacerbates the risk posed by the proposed development.
- 13.8. By failing to describe the significance of the heritage assets affected, including any contribution made by their setting, the Applicant has neglected their duty to safeguard the heritage value of Mary Ward House. This neglect is in direct contravention of the principles outlined in paragraph 200 of the NPPF, which require thorough consideration and protection of the historic environment.
- 13.9. In light of these significant shortcomings, it is imperative that the council rejects the planning application under Paragraph 200 of the NPPF. The preservation of Mary Ward House's historical functional space and use, along with its setting and significance as a heritage asset, must take precedence over any proposed development that fails to adequately address these critical concerns.

13.10. *Paragraph 201.*

Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."

- 13.10.1. We kindly request that the local planning authority confirm its compliance with Paragraph 201 of the National Planning Policy Framework (NPPF). This paragraph stipulates that where a decision-maker determines that a proposed development will lead to substantial harm to or loss of significance of a designated heritage asset, the proposal should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or that there are no reasonable alternative means to deliver those benefits. Given the significant heritage value of Mary Ward House and the potential impact of the proposed development on its significance, it is crucial that the local planning authority provides assurance that Paragraph 201 has been thoroughly considered in the evaluation of the planning application. Confirmation of compliance with this provision will ensure that the decision-making process aligns with the principles of protecting and preserving our built heritage for future generations.

13.10.2. Please confirm if the LPA has complied with this requirement for planning application reference 2021_6105_P and provide a copy of the report.

13.11. "Paragraph 203.

In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness."

13.11.1. With reference to paragraph 203 of the National Planning Policy Framework (NPPF), the local planning authority (LPA) is urged to prioritize the sustainability and enhancement of the use of heritage assets consistent with their conservation. However, the proposed development presents significant challenges to sustaining the use of Mary Ward House as a space for knowledge learning and dissemination.

13.11.2. Firstly, the application lacks crucial details regarding the potential impacts on sound, noise, and chemical use in the final proposed use. This lack of information raises serious concerns about the compatibility of the development with the sensitive nature of the heritage asset and its intended use.

13.11.3. Additionally, the projected duration of the development, ranging from 60 to 156 weeks, exacerbates the issue. The issue of noise and vibration must be carefully considered, not solely in terms of actual decibel output but also in the perceived output within this heritage and conservation setting. It is evident that no rational member of the public, public sector body, or charity would choose to book space for knowledge learning and dissemination adjacent to a massive construction site. Therefore, it is imperative that the LPA thoroughly assesses these concerns and ensures that any proposed development aligns with the conservation and sustainable use objectives outlined in paragraph 203 of the NPPF.

13.11.3.1. The LPA ought to remember that Mary Ward House was placed on the Listed Buildings at Risk Register in 2002. Ensuring sustainable interaction with the local community and ensuring economic vitality is critical to ensuring the future of Mary Ward House.

13.11.3.2. In 2002, Mary Ward House was placed on the Listed Buildings at Risk Register, highlighting the urgent need for restoration and maintenance. Unfortunately, the Mary Ward House Trust at that time was unsuccessful in securing lottery funding, leaving the building vulnerable to further decay and deterioration.

13.11.3.3. Since then, considerable efforts have been made to restore and maintain Mary Ward House. The building has undergone painstaking renovation to ensure its preservation as an essential part of our National Heritage. Despite financial challenges, we have been dedicated to this cause, recognizing the vital role Mary Ward House plays in promoting learning, knowledge dissemination, and equality.

13.11.3.4. Given the ongoing maintenance restoration efforts and the importance of Mary Ward House in advancing education, arts, culture, and social welfare, we urge the LPA to consider the impact of the proposed development on our historic building and its mission. Any disruptions caused by the construction would be catastrophic

and ultimately hinder our ability to fulfill our objectives and jeopardize the integrity of this valuable asset.

13.12. “Paragraph 205.

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.”

13.12.1. In accordance with paragraph 205 of the National Planning Policy Framework (NPPF), we urgently plead with the local planning authority (LPA) to acknowledge and prioritize the Grade 1 Listed status of Mary Ward House when evaluating the impact of the proposed development on the significance of this cherished heritage asset and its conservation. The historical and architectural importance of Mary Ward House cannot be overstated, and as such, it deserves the utmost weighted importance in any decision-making process regarding development within its vicinity. It is imperative that the LPA recognizes the irreplaceable value of this heritage asset and ensures that any proposed development does not compromise its significance or integrity.

13.12.2. Furthermore, the proposed development presents an imminent threat to Mary Ward House, with potentially catastrophic consequences. The proposed changes could irreversibly alter the character and fabric of this historic building, undermining its cultural and architectural significance. Such a disregard for the preservation of Mary Ward House’s heritage is deeply troubling and cannot be overlooked.

13.12.3. Moreover, there has been a grave dereliction of duty on the part of LB Camden in granting planning permission to the 2021 development application. This failure must not be repeated in the context of the current planning application. There is a glaring absence of evidence demonstrating that LB Camden has fulfilled its legal obligations in this regard. Therefore, we implore LB Camden to acknowledge any legal errors made in granting planning application X and to take immediate steps to rectify the situation.

13.12.4. In conclusion, we urge the LPA to uphold the Grade 1 Listed status of Mary Ward House as a matter of paramount importance and to reject any development proposals that pose a threat to its significance and conservation. It is incumbent upon LB Camden to fulfill its obligations and protect this invaluable heritage asset for the benefit of current and future generations.

13.13. “Paragraph 206

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”*

13.13.1. According to Paragraph 206 of the National Planning Policy Framework (NPPF), it is imperative that any proposed development thoroughly considers and justifies its potential impact on the sustainability and enhancement of Mary Ward House’s significance. However, the current application fails to provide any clear or convincing justification for the dire ramifications that sustaining and enhancing the significance of Mary Ward House may entail.

13.13.2. Paragraph 200 of the NPPF, which requires careful consideration of substantial harm or loss to designated heritage assets, has not been discharged adequately in this case. The Planning application lacks sufficient evidence or rationale to assess the extent of harm or loss that may result from the proposed development. Consequently, the Planning application cannot reasonably, fairly, and accurately fulfill its obligations under paragraph 206 of the NPPF.

13.13.3. Furthermore, the failure to provide a clear and convincing justification undermines the ability of the local planning authority to make an informed decision regarding the sustainability and enhancement of Mary Ward House. Without a thorough understanding of the potential ramifications, the LPA cannot adequately protect and preserve this significant heritage asset.

13.13.4. Therefore, it is imperative that the Planning application undergoes rigorous scrutiny to ensure that all relevant policies and obligations under the NPPF are adequately addressed. Failure to do so would constitute a serious oversight and may lead to irreparable harm to the significance and integrity of Mary Ward House.

13.14. "Paragraph 207

Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent".

13.14.1. According to paragraph 207 of the National Planning Policy Framework (NPPF), if it is a matter of fact that a proposed development will lead to substantial harm to a designated heritage asset, the local planning authority (LPA) is lawfully required to refuse consent. In the case of the proposed development, it is indisputable that significant harm will be inflicted upon Mary Ward House. The alterations and additions outlined in the application, including substantial demolition, changes to external facades, and the introduction of new structures, will irreversibly compromise the historical and architectural integrity of Mary Ward House. This substantial harm is evident in the potential loss of historic fabric, the alteration of key architectural features, and the disruption of the building's original design and use.

13.14.2. Therefore, in accordance with paragraph 207 of the NPPF, the LPA is duty-bound to refuse consent for the proposed development due to the undeniable and substantial harm it will inflict upon Mary Ward House. Any approval of the application would not only contravene statutory obligations but also undermine the fundamental principles of heritage conservation and protection outlined in national planning policy.

13.15. "Paragraph 208

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."

13.15.1. In accordance with paragraph 208 of the National Planning Policy Framework (NPPF), it is imperative to highlight that the proposed development will undoubtedly lead to substantial harm to Mary Ward House. The alterations and additions outlined in the application, including substantial demolition, changes to external facades, and the introduction of new structures, will irreversibly compromise the historical and architectural integrity of this cherished heritage asset. Mary Ward House holds immense cultural significance, and any harm inflicted upon it would be a loss not only to the local community but also to the nation's heritage as a whole.

13.15.2. However, in the unlikely event that the LPA disregards the substantial harm posed by the proposed development and deems it to result in less than substantial harm, it is crucial to weigh this harm against the purported public benefits of the proposal. The optimum viable use of Mary Ward House, which is as it is currently used, serves as a beacon of heritage preservation and community engagement. This use not only maintains the historical significance of the building but also ensures its continued conservation and relevance to the community. Conversely, the applicant has failed to provide any justifiable public benefit that outweighs the destruction of our heritage. Therefore, it is imperative that the LPA carefully considers the true extent of harm posed by the proposed development and prioritizes the conservation and sustainable use of Mary Ward House for the benefit of present and future generations.

13.16. “Paragraph 211

Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.”

13.16.1. In accordance with paragraph 211 of the National Planning Policy Framework (NPPF), we express our profound outrage and incandescence at the utter lack of meaningful record or advance understanding demonstrated by the applicant and developer regarding the significance of Mary Ward House. As a Grade 1 Heritage Asset of immense cultural and historical importance, Mary Ward House deserves the utmost respect and consideration in any proposed development. However, we have witnessed no evidence of the applicant's efforts to comprehensively document and acknowledge the significance of this iconic landmark.

13.16.2. Furthermore, there has been a glaring absence of contemporaneous proofs indicating that any such evidence has been made public in a suitable manner. The failure to disseminate information regarding the significance of Mary Ward House not only demonstrates a disregard for transparency and public engagement but also undermines the principles of heritage conservation and protection outlined in the NPPF. Such negligence on the part of the applicant and developer is reprehensible and unacceptable.

13.16.3. We vehemently implore the local planning authority to address this egregious oversight and demand that the applicant and developer provide a comprehensive and publicly accessible record of the significance of Mary Ward House in accordance with paragraph 211 of the NPPF. Failure to do so would constitute a serious dereliction of duty and would compromise the integrity of the planning process. Mary Ward House is a treasure of our cultural heritage, and it is imperative that its significance is properly acknowledged and respected in any proposed development.

The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): Cumulative Change

14. According to The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition):

- 14.1. *"Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it (see also paragraph 40 for screening of intrusive developments)."*⁵

15. Conservation Decisions and Proportionate Assessment

- 15.1. Amongst the Government's planning policies for the historic environment is that conservation decisions are based on a proportionate assessment of the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset. Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to the complexity of the case, from straightforward to complex:⁶

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes

- 15.2. We urgently request confirmation from the Council regarding the steps they have undertaken in assessing the setting of Mary Ward House. We demand that the Council promptly makes public and provides us with the details, written assessments, and documentation pertaining to their evaluation of the setting of this significant heritage asset. Transparency and accountability are paramount in the planning process, especially concerning the protection and preservation of invaluable heritage assets like Mary Ward House. Therefore, we insist that the Council fulfills its obligation to provide comprehensive information and documentation regarding the assessment of the setting of Mary Ward House, as outlined in the referenced guidance. Failure to do so would raise serious concerns about the Council's commitment to upholding best practices in heritage conservation and planning.

16. Cumulative Change

- 16.1. In accordance with "The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)," it is imperative to emphasize that the proposed development fails to adequately address the issue of cumulative change. Mary Ward House has already experienced encroachment from the adjacent Tavis House development. This new application seeks to further increase massing, exacerbating the existing problem of encroachment and cumulative impact on the setting of a listed building.

- 16.2. Moreover, consideration must be given to the historic use of the development site. Tavis House, situated on the same lands as Mary Ward House and owned by the Bedford Estates, has historically operated in alignment with similar ideals as Mary Ward House. It has

⁵ <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

⁶ The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

primarily accommodated public services, maintaining a use that respects the cultural and historical context of the conservation area. The proposed change of use for matters of financial gain represents a significant departure from this historical precedent, further undermining the conservation area and the setting of the listed building.

- 16.3. The failure of the proposed development to adequately address the issue of cumulative change poses a serious threat to the integrity and significance of Mary Ward House and its surroundings. It is imperative that the local planning authority carefully considers the cumulative impact of developments in the vicinity and rejects proposals that would compromise the setting and heritage value of this cherished listed building. Failure to do so would represent a dereliction of duty and a failure to uphold best practices in heritage conservation and planning.

17. Economic Viability

- 17.1. In accordance with HM Government's advice on enhancing and conserving the historic environment, we urgently plead with the local planning authority to consider the critical importance of preserving the significance and use of heritage assets. Developments that materially detract from the asset's significance and use not only pose an immediate threat to its cultural and historical value but also jeopardize its economic viability, both now and in the future. It is imperative that the local planning authority comprehensively assesses the long-term implications of proposed developments on the economic sustainability of heritage assets.
- 17.2. Heritage assets, such as Mary Ward House, are not only repositories of our cultural heritage but also valuable economic assets that contribute to the vitality and identity of our communities. Any development that undermines the significance and use of these assets not only diminishes their cultural value but also threatens their economic viability. The loss of economic viability can have far-reaching consequences, including diminished opportunities for sustainable conservation and adaptive reuse, as well as decreased investment and tourism potential.
- 17.3. Furthermore, the economic sustainability of heritage assets is intricately linked to their ongoing conservation. Without adequate economic resources, it becomes increasingly challenging to implement necessary conservation measures and maintain the integrity of these assets over time. Therefore, the local planning authority must recognize that developments which compromise the economic viability of heritage assets also jeopardize their long-term conservation and sustainability.
- 17.4. We implore the local planning authority to prioritize the preservation of the significance and use of heritage assets and to reject any developments that pose a threat to their economic viability. Failure to do so would not only undermine the cultural and historical value of these assets but also jeopardize their long-term conservation and sustainability, to the detriment of present and future generations.

Principle of Development

18. Rear of the Site & Return Alterations

- 18.1. The principle of development concerning the rear of the site and return alterations necessitates thorough consideration, particularly in its potential impact on the setting of Mary Ward House and the surrounding Conservation Area. While there is acknowledgment that improvements are needed to enhance the overall setting, it is vehemently disputed that the proposed development at the rear is acceptable.

18.2. The Listed Gates Railings and Piers are due to be restored and will be visually less discernible against to current proposed backdrop.

18.3. Jon Lowe Heritage Townscape Impact Assessment seeks to argue that “the gap between Tavis House and Mary Ward House is clearly defined, and it acts as an important ‘break’ between the varied townscapes of Tavistock Place and Tavistock Square.” It is obvious from the below photographs, which are reproduced from the Townscape Impact Assessment, that no such clear gap exists.



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1.1. ⁷ Verified View 2 Jon Lowe Heritage Townscape Impact Assessment



- 18.4. Please note that we have not enlarged the picture to accentuate the hideous imposition of the façade (shown with green tiles below) which detracts from key architectural details of Mary Ward House and in particular the noteworthy listing on English Heritage of the arch windows which now appear subservient to Tavis House. These pictures are taken from and reproduced in the same size and format as Jon Lowe Heritage Townscape Impact Assessment which is available in the public domain.

THE LONDON PLAN

19. Policy D1 London's form, character and capacity for growth

- 19.1. The requirement of Policy D1 is also noted in Policy HC1, paragraph 7.1.5, which underscores the necessity for planners and developers to engage and collaborate with stakeholders throughout the conservation and development process:

20. Paragraph C of Policy HC1 Heritage conservation and growth:

“Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.”

- 20.1. The requirement of Policy D1 is also noted in Policy HC1, paragraph 7.1.5, which underscores the necessity for planners and developers to engage and collaborate with stakeholders throughout the conservation and development process:

- 20.2. With reference to Paragraph C of Policy HC1 Heritage conservation and growth, it is imperative to underscore the explicit requirement that planners and developers engage and collaborate with stakeholders to ensure that the capital's heritage contributes positively to its future. This application flagrantly violates this mandate, as evidenced by the egregious lack of

engagement from both the local planning authority (LB Camden) and the developer with key stakeholders, namely English Heritage and Mary Ward House.

20.3. The policy underscores the importance of meaningful collaboration between planners, developers, and stakeholders to safeguard and enhance the heritage of London. However, in this case, LB Camden has failed to fulfill its duty to engage with stakeholders, including Mary Ward House, despite their pivotal role in the conservation and management of heritage assets. The lack of consultation not only disregards the input and expertise of stakeholders but also undermines the principles of transparency and accountability in the planning process.

20.4. Furthermore, the developer's failure to engage with English Heritage and Mary Ward House demonstrates a blatant disregard for the importance of preserving and protecting heritage assets. By neglecting to involve key stakeholders in the development process, the developer disregards the valuable insights and perspectives that could contribute to the positive integration of heritage into the proposed development.

20.5. It is imperative that LB Camden and the developer adhere to the requirements of Policy HC1 and engage in meaningful collaboration with stakeholders to ensure that the proposed development respects and enhances the heritage of the area. Failure to do so not only contravenes policy directives but also undermines the integrity of the planning process and risks irreparable harm to the capital's rich cultural heritage. We demand immediate rectification of this oversight and insist on genuine, transparent engagement moving forward.

20.6. Paragraph 7.1.7 Heritage significance.

20.6.1. Paragraph 7.1.7 of The London Plan 2021 emphasizes the imperative of responding positively to the significance of heritage assets and their settings. Regrettably, it is evident that the applicant and developers have failed to fully comply with this guidance. Despite clear directives, there exists unequivocal evidence demonstrating their inadequate consideration of the heritage significance, local context, and character of heritage assets. Numerous developments within the Bloomsbury Conservation Area have proceeded without appropriate mitigation measures, resulting in adverse impacts on heritage assets and significant architectural disfigurements. These developments often deviate from the scale, materials, details, or form of existing heritage structures, leading to a loss of their contribution to the area's significance.

20.6.2. The historic litany of failures, while acknowledged not solely the fault of the Local Planning Authority (LPA), must not extend to the current development. The protection and enhancement of heritage assets, as outlined in paragraph 7.1.7, remain paramount, yet have not been achieved in this instance. Therefore, the planning authority is urged to reject this application, as it does not align with the fundamental principles of preserving and enhancing the heritage assets of the Bloomsbury Conservation Area, as stipulated in The London Plan 2021.

21. Paragraph 7.2

22. Paragraph 7.2 of the Camden Local Plan state the council will require all developments to consider:

character, setting, context and the form and scale of neighbouring buildings;
the character and proportions of the existing building, where alterations and extensions are proposed;
the wider historic environment and buildings, spaces and features of local historic value

23. It is glaringly evident from the information presented herein that the applicant and developer have woefully failed to adequately consider or adhere to the requirements outlined in Paragraph 7.2 of the Camden Local Plan. This paragraph explicitly mandates that all developments must meticulously assess and address various critical aspects, including the character, setting, context, and the form and scale of neighboring buildings. Furthermore, it emphasizes the importance of considering the character and proportions of existing buildings when proposing alterations or extensions, as well as the wider historic environment and buildings, spaces, and features of local historic value.

24. The Bloomsbury Conservation Area Appraisal and Management Strategy, an adopted supplementary planning document, explicitly highlights the special interest of Mary Ward House. Paragraph 7.41 of this document places a specific obligation on the council to give special regard to preserving listed buildings. The council is expected to ensure that development not only conserves but also takes opportunities to enhance or better reveal the significance of heritage assets and their settings.

25. However, it is an incontrovertible fact that the proposed development fails to fulfill this requirement. Instead of conserving Mary Ward House, the proposed development has the opposite effect—it substantially damages a Grade 1 Listed Building. This development not only disregards the special interest and significance of Mary Ward House but also violates the council's obligation to preserve and enhance heritage assets. It undermines the integrity of the Bloomsbury Conservation Area and sets a dangerous precedent for future development within the area.

26. Therefore, it is imperative that the council upholds its responsibility to preserve and enhance heritage assets by rejecting the proposed development. Any approval of this development would be a grave dereliction of duty and a betrayal of the trust placed in the council to safeguard the cultural heritage of the Bloomsbury Conservation Area. It is essential that the council takes decisive action to protect Mary Ward House and ensure that its significance is preserved for future generations.

27. Policy D2 Heritage

27.1. “The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings”

27.1.1. It is imperative to strongly remind the council that they have a duty not to permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings. This obligation is fundamental to the preservation and protection of our cultural heritage and must not be taken lightly. Any decision that jeopardizes the integrity or significance of such assets would be a grave betrayal of the council's responsibility to safeguard our shared history and heritage for present and future generations. Therefore, it is incumbent upon the council to uphold this principle unwaveringly and reject any proposal that threatens the integrity of our designated heritage assets

27.2. LISTED BUILDINGS

27.2.1. It is crucial to remind LB Camden of their responsibilities under Policy D2 of the Camden Local Plan, particularly concerning heritage and listed buildings. Specifically, the section on Listed Buildings (page 236) which underscores the obligation to resist proposals for a change of use or alterations and extensions to a listed building if such actions would cause harm to the special architectural and historic interest of the building. It also imposes a duty to resist development that would cause harm to the significance of a listed building through its impact on its setting. These provisions are essential safeguards aimed at preserving the integrity and significance of our cherished heritage assets. LB Camden must adhere to these responsibilities diligently to ensure the protection and conservation of our valuable cultural heritage for current and future generations. Any deviation from these principles would constitute a failure to fulfill their duty to safeguard our historic built environment.

27.3. Demolition in conservation areas

27.3.1. Paragraphs 7.49 to 7.52 of the Local Plan deal with Demolition in conservation areas.

27.3.2. The Planning Application involves substantial demolition works.

27.3.3. It is imperative to remind Camden that applications for total or substantial demolition in conservation areas must adhere to stringent criteria. Specifically, they must demonstrate to the Council's satisfaction that effective measures will be implemented during demolition and building works to ensure the structural stability of retained parts and adjoining structures. Before planning permission for demolition is granted, the Council must be assured that acceptable detailed plans for the redevelopment are in place. We have seen no evidence that the applicant has accurately conveyed their plans for demolition.

27.3.4. In addition, proposals for demolition and reconstruction should be justified based on the optimization of resources and energy use when compared to the existing building. This requirement is in alignment with Policy CC1 Climate Change Mitigation, which emphasizes the importance of minimizing environmental impact and promoting sustainability in development projects. Camden must carefully evaluate demolition proposals in conservation areas to ensure that they meet these stringent criteria and contribute positively to the conservation and sustainability goals of the local area. Failure to do so would risk irreversible harm to the historic built environment and undermine efforts to mitigate climate change.

27.4. Paragraph 7.53 deal with Use

27.4.1. *"Changes in patterns of use can also erode the character of an area. It is therefore important that, whenever possible, uses which contribute to the character of a conservation area are not displaced by redevelopment"*

27.4.2. Cumulative changes in patterns of use can indeed erode the character of an area over time. It is therefore crucial that, whenever feasible, uses that contribute to the character of a conservation area are not displaced by redevelopment. The shift from public services to financial gain can significantly detract from the character and ambiance of the area. Such changes may disrupt the delicate balance and historical fabric that define the unique identity of the conservation area. Therefore, it is imperative for planning authorities to carefully consider the impact of proposed developments on the character and vitality of the area, prioritizing the preservation of its heritage and distinctive qualities. Failure to do so risks irreversibly altering the character and charm that make the conservation area special and cherished by residents and visitors alike.

27.5. Paragraphs 7.57 to 7.60 deal with listed buildings.

27.5.1. Paragraphs 7.57 to 7.60 of the planning guidance deal explicitly with listed buildings, emphasizing the critical importance of their setting. Notably, paragraph 7.60 unequivocally states that "the setting of a listed building is of great importance and should not be harmed by unsympathetic neighboring development." However, it is abundantly clear that the proposed neighboring development in this case is profoundly unsympathetic to both the architectural features and historic and future use of the listed building.

27.5.2. The proposed development fails to respect the historical significance and architectural integrity of the listed building, imposing a visual intrusion that disrupts the harmonious relationship between the building and its surroundings. Moreover, the proposed development threatens to compromise the future use and viability of the listed building, undermining its cultural and heritage value for generations to come.

27.5.3. It is imperative that the planning authority recognizes the gravity of the situation and takes decisive action to prevent the proposed development from causing irreparable harm to the setting of the listed building. Any approval of the development would constitute a blatant disregard for the principles outlined in the planning guidance and a betrayal of the responsibility to protect and preserve our cultural heritage. Therefore, the planning authority must reject the proposed neighboring development in order to safeguard the integrity and significance of the listed building and uphold the principles of conservation and heritage preservation.

PROPOSED USE

28. The proposed use of the site lacks clear definition and specificity⁸, posing significant concerns regarding stakeholders' ability to fully comprehend and assess the proposed development. While it is broadly categorized as a use for Life Sciences, the vague characterization offers little insight into the practical implementation and operational details of the proposed use. This ambiguity presents a serious risk, as stakeholders are left uninformed and unable to adequately understand the potential impacts and implications of the development.
29. Without a clear and detailed explanation of how the proposed use will be executed and utilized, stakeholders are left in the dark, unable to make informed judgments or provide meaningful input on the development. This lack of transparency undermines the principles of open and inclusive decision-making processes, denying stakeholders the opportunity to engage effectively and contribute valuable insights.
30. The absence of clear information impedes stakeholders' ability to conduct meaningful assessments and provide informed feedback on critical issues such as noise levels, chemical usage, and impacts on the conservation and heritage settings. These concerns are not merely hypothetical; they represent tangible risks that could have far-reaching consequences for the local environment, cultural heritage, and quality of life for residents.
31. Furthermore, the absence of clear definition raises questions about the legitimacy and feasibility of the proposed development. Without a comprehensive understanding of the intended use and its

⁸ 1. The Financial Viability letter by DS2 LLP (26 March 2024) submitted as part of the application makes note that the end use has not been confirmed and states: "such fit outs are highly bespoke and unique to specific end-users and as a result".

operational framework, it is difficult to assess the project's compatibility with existing regulations, infrastructure, and community needs.

32. In light of these concerns, it is imperative that the planning authority demands clarity and specificity regarding the proposed use of the site. Stakeholders deserve full transparency and detailed information to ensure meaningful engagement and informed decision-making. Without such clarity, the proposed development risks proceeding without adequate scrutiny and may result in adverse consequences for the community and the broader environment. Therefore, it is essential to address this deficiency and insist on a comprehensive and transparent explanation of the proposed use before any further consideration of the development.

FINANCIAL VIABILITY LETTER

33. It is evident from marketing materials provided by Gerald Eve LLP, the planning consultant for this application, that office space in the adjacent property of Lynton House is being actively marketed. This contradicts the accuracy and acceptability of the financial liability letter submitted as part of the application process. The letter, which purportedly outlines the financial viability of the proposed development, appears to substantially understate the projected income.
34. The discrepancy between the marketing material and the financial liability letter raises serious questions about the accuracy and reliability of the financial projections presented to support the development. If office space in Lynton House is indeed being marketed, it suggests a potential source of income that has not been adequately accounted for in the financial assessment provided. This discrepancy not only undermines the credibility of the financial viability letter but also calls into question the overall financial basis of the proposed development.
35. Given the importance of accurate financial assessments in evaluating the viability and feasibility of development projects, it is imperative that discrepancies such as these are addressed and resolved transparently and comprehensively. The planning authority must conduct a thorough review of the financial projections and require the applicant to provide updated and accurate information regarding the potential income generated by the adjacent office space. Failure to do so would compromise the integrity of the planning process and risk making decisions based on incomplete or misleading information. Therefore, it is essential that the planning authority takes prompt and decisive action to ensure that the financial viability of the proposed development is accurately and transparently assessed.

HISTORIC USE OF TAVIS HOUSE

36. The historic use of Tavis House has been consistently for public sector bodies, serving the needs of government departments and charitable organizations. It is crucial to recognize that both Mary Ward House and Tavis House have shared a similar ethos of serving the public and local communities. Moreover, their close historical relationship is underscored by the fact that they were constructed on the same lands, owned by the Duke of Bedford, following the Blitz in 1940/41. The grounds on which Tavis House stands were once part of the same estate where Mary Ward House, formerly known as the Passmore Edwards Settlement, was built.
37. Had the applicant and developers consulted with us over their plans, we would have been able to offer highly synergistic proposals that would have benefited all stakeholders involved. It is evident that the applicant and developers are primarily driven by commercial interests, as evidenced by their blatant disregard for properly engaging with the local community and stakeholders. However, it is essential to emphasize that the historic use and relationship between the properties are significant considerations that cannot be ignored.

38. Furthermore, alternative proposals that prioritize the preservation of the historic character and public service ethos of both Mary Ward House and Tavis House could potentially generate higher revenues for the applicant while substantially reducing development costs. While commercial decisions may not inherently be planning matters, the historical significance and community impact of the proposed development cannot be disregarded. Therefore, it is imperative that any planning decisions take into account the shared history, public service heritage, and community relationships of both Mary Ward House and Tavis House. Failure to do so would risk undermining the cultural and historical integrity of these invaluable assets and betraying the trust and expectations of the local community and stakeholders

CONSTRUCTION MANAGEMENT PLAN

39. The Construction Management Plan (CMP) dated 3 Dec 2021 fails to adequately reflect the proposed planning changes and change of use outlined in the revised planning application dated March 2024. The significant revisions, including the proposed substantial demolition of most of the interior and entire rear façade of the building, introduce new challenges and complexities that are not addressed in the current CMP.
40. It is evident that the CMP, as it stands, does not comprehensively deal with the problems and difficulties that will arise from the revised planning application. The proposed demolition alone presents a multitude of logistical and operational challenges that require careful consideration and mitigation measures, none of which are adequately addressed in the current CMP.
41. Furthermore, the failure of the CMP to align with the revised planning application demonstrates a lack of foresight and diligence on the part of the applicant and developers. It is essential that any construction management plan accurately reflects the proposed development and anticipates the specific challenges and impacts associated with it.
42. Given the substantial changes proposed in the revised planning application, it is imperative that a revised CMP be prepared to address the new scope of work, potential disruptions, and mitigation measures required. Failure to do so not only undermines the effectiveness of the construction management process but also poses risks to the safety, well-being, and interests of the local community and stakeholders.
43. Therefore, it is imperative that the planning authority requires the applicant to revise and update the CMP to accurately reflect the proposed planning changes and address the challenges posed by the revised development proposal. Any further consideration of the planning application must be contingent upon the submission and approval of a comprehensive and updated CMP that adequately addresses the revised scope of work and associated impacts.
44. The proposed development site, Tavis House, located on a designated Strategic Route Network (SRN), raises significant concerns regarding the suitability of the planned loading and unloading area. This concern is heightened by the area's proximity to a bus stop and its position immediately before a left turn into Tavistock Place heading northeast. These factors pose specific risks and challenges that must be thoroughly addressed to ensure that the proposed changes do not detrimentally affect the safety, efficiency, and quality of life for local residents and road users.
45. Impact on Traffic Flow and Safety
- 45.1. The loading and unloading area's proximity to both a bus stop and a critical turning point into Tavistock Place creates a potential bottleneck, a scenario which is particularly concerning on a route classified as part of the Strategic Road Network (SRN). The SRN is intended to facilitate smooth and efficient traffic flow, which is critical to the functioning of the wider road

network. Introducing frequent stops and starts associated with loading and unloading activities can lead to increased congestion. This congestion is likely to result in higher waiting times and delayed traffic flow, which extends beyond mere inconvenience and poses real risks:

46. Safety Risks at Bus Stops

- 46.1. The presence of a loading/unloading zone immediately after a bus stop may lead to conflicts between stationary buses and maneuvering delivery vehicles. This can endanger passengers alighting from buses, particularly the elderly, children, and those with mobility challenges.

47. Increased Accident Potential

- 47.1. The proposed location for the loading and unloading zone immediately before a left turn at Tavis House presents inherent traffic hazards. In areas where vehicles frequently adjust lanes and speeds to navigate turns, introducing additional stops and starts can significantly increase the likelihood of traffic incidents, such as rear-end collisions and side-swiping. The unpredictable nature of loading and unloading activities in this spot exacerbates these risks. Moreover, if these activities result in stationary vehicles obstructing views, drivers' ability to see other road users, including pedestrians at nearby crossings, can be severely compromised.

Additionally, this location's proximity to a pedestrian crossing raises further safety concerns. Stationary vehicles can block pedestrian paths, increasing the risk of accidents involving pedestrians and forcing them to navigate around or between vehicles, potentially putting them in the path of moving traffic. Implementing measures to prevent or restrict parking and loading close to this junction is crucial. Such measures are vital for maintaining clear visibility for all road users and ensuring the safety of the area, aligning with best practices for traffic management and urban planning.

48. Impedance to Emergency Vehicles

- 48.1. In situations of increased traffic congestion, the ability of emergency vehicles to navigate through Tavistock Square may be severely hindered, potentially delaying critical response times during emergencies.

49. Effects on Local Road Network and Planning Developments

- 49.1. Beyond immediate traffic flow and safety concerns, the suitability of the loading/unloading area must be considered in the context of overall urban planning and development. Strategic Route Networks are designed not just for current needs but to accommodate future traffic growth and changes in urban dynamics. Placing a loading/unloading zone in a potentially problematic area could necessitate future roadwork or changes to traffic patterns, leading to further disruptions and financial costs. Additionally, it may limit options for improving or enhancing pedestrian and cycling routes in the area.

50. Community Impact and the Need for Comprehensive Consultation

- 50.1. Given these potential impacts, it is crucial that the Camden Council engage in a robust, transparent, and non-biased consultation process with local residents, businesses, and other stakeholders. Effective consultation should include:

- 50.1.1. Detailed traffic and environmental impact assessments shared openly with the community.

- 50.1.2. Opportunities for local residents to express concerns, provide feedback, and contribute to planning discussions, especially those most affected by the proposed changes.
 - 50.1.3. Consideration of alternative solutions that minimize disruption and maximize safety, such as relocating the loading/unloading zone or implementing strict operational time windows.
51. The strategic location of Tavis House on the SRN, coupled with its proximity to a bus stop and a critical road junction, makes the proposed site for loading and unloading highly unsuitable without significant mitigation measures. It is imperative that any planning decisions prioritize the safety, health, and wellbeing of all local residents and ensure that the integrity and functionality of the SRN are maintained. This can only be achieved through a concerted effort that involves all stakeholders in a meaningful and constructive dialogue.

Lack of Engagement and Deceitful Misrepresentation [REDACTED]

52. The lack of engagement and deceitful misrepresentation [REDACTED], particularly exemplified by [REDACTED] and [REDACTED], is utterly reprehensible and warrants the strongest condemnation. Despite our proactive attempts to engage with [REDACTED] regarding the planning application, including specific requests for information and agendas, [REDACTED] chose to sidestep meaningful dialogue and instead resorted to contacting junior staff members via general telephone and email channels. This behavior is not only unprofessional but also deeply concerning, especially considering the Grade 1 listed nature of Mary Ward House and its continuous occupation.
53. Furthermore, the attempt by [REDACTED] to portray their consultation efforts as comprehensive and inclusive is nothing short of deceitful. The assertion by [REDACTED] that there has been limited concern or interest from stakeholders is a blatant distortion of the truth and a shameful attempt to downplay legitimate concerns raised by the community.
54. The devious nature of the applicant's actions, seeking to misrepresent consultation efforts and disregard the importance of engaging with senior management and trustees, is reprehensible and indicative of their disregard for transparency and accountability. Such behavior undermines the integrity of the planning process and demonstrates a complete lack of respect for the heritage and stakeholders associated with Mary Ward House.
55. This blatant disregard for integrity not only undermines the credibility of their purported engagement efforts but also raises serious questions about their ethical standards and professional conduct.
56. Such behavior not only fails to serve the interests of stakeholders but also erodes trust in the planning process.
57. These deceitful tactics are not only morally reprehensible but also potentially criminal in their intent to manipulate and deceive LB Camden into agreeing to a development which would Damage a

Conservation Area and Listed Building. Therefore, we implore the planning authority refuse the application based on the lack of genuine engagement and trustworthiness of the consultation process.

58. We will be formally addressing our concerns regarding this lack of engagement with the council leadership, including Georgia Gould, Jenny Rowlands, and Dan Pope, to ensure that the seriousness of this issue is fully recognized and addressed. The public nature of these concerns necessitates immediate attention and action to safeguard the integrity of the planning process and protect the interests of the community and stakeholders involved.


Conclusion

59. In light of the egregious lack of engagement and deceitful misrepresentation demonstrated by the applicant, I implore the LB Camden Council to reject the planning application in its current form. The flagrant disregard for transparency, accountability, and genuine consultation has undermined the integrity of the planning process and betrayed the trust of the community and stakeholders involved.
60. It is imperative that the council takes decisive action to address the concerns set out herein and uphold the principles of fairness, transparency, and community engagement in the planning process. Meaningful consultation with all affected parties must be prioritized to ensure that any proposed developments are compatible with the needs and interests of the community and that the integrity of heritage assets such as Mary Ward House is preserved.
61. By rejecting the planning application and committing to genuine engagement with stakeholders, the council can demonstrate its commitment to upholding the public interest and safeguarding the cultural heritage and well-being of the community. It is essential that the council acts responsibly and decisively to rectify the shortcomings of the current planning process and ensure that future developments align with the aspirations and priorities of the community.
62. Thank you for considering my objections.

Yours faithfully,



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