

Application No:	Consultees Name:	Received:	Comment:	Response:
2021/3839/P	Duncan Webster	05/11/2021 14:16:31	OBJ	Camden Planning Application No 2021/3839/P- Application Objection. Howitt Close, London, NW3 4LX Construction Management Plan- Observations & Comments- 05.11.2021

Dear M.s Kate Henry / Planning Officer.

Please find my comments with regard the CMP which are a few statements as to why I object to the above application and should be read in conjunction with the my previous comments. There are few chosen points from the CMP indicate the the main points that are being made.

Best Wishes Duncan Webster

Since my comments regarding the application submitted on 02.11.2021, I have been informed that the 'Construction Management has (CMP) has now been made available for viewing. I was not aware that this omitted document, listed in the original application covering letter, had been uploaded and that the closing date for objection revised to 17.11.2021.

CMP SUBMISSION TIMING:

- Viewing the CMP: It was prepared with all revisions in March 2021 and was listed in the applicants original covering letter dated 27.07.2021, but not uploaded until 4 days after original objection date was closed, 23.10.2021. Many objectors will not be aware of the applicants upload & new closing date of 17.11.2021, so will not have a chance of commenting on the document.

THE DOCUEMENT:

- Draft Document: It is noted that it is titled as a 'Draft Working Document', meaning in a sense the applicant has not fully developed the project to a point where the impact of the proposals have been developed to understand the impact they will have on Howitt Close (HC) and its surrounding neighbourhood.

- The Document in it's introduction States: 'The purpose of the CMP is help developers (applicant) to minimise construction impacts, and relates to all construction activity both on and off the site that impacts the wider environment'. Refer to the previous comment above.

- In general, there are large sections of the CMP that refer to being clarified after any potential planning approval, when the contractor would be appointed, whilst other sections list legislation which the applicant / contractor must adhere too (e.g. the environmental section). The applicant appears to be moving major issues down the line, beyond the application phase to a future development in design & construction without analysing what the true impact of the proposals have on HC and the surrounding area. Surely planning can't be granted as there are to many unknowns that the applicant has avoided in the preparation of the CMP which have been identified earlier highlighting the difficulties in executing the proposals?

TIME FRAME:

- Time Frame: The time frame appears to a bit out of sync as states the planning permission comes 1st, followed by contractor appointment, then begin community liaison, surely the latter should have been taken into account as part of the planning application process as stated in the section 'Community Liaison'.

- None Consultation: The applicant has NOT CONSULTED' the existing lease holders and occupants of HC as strongly advised by Camden Planning, appearing to take the approach that they do not exist. The roof not being treated as an independent plot in the air effecting no one?- HC IS FULLY OCCUPIED.

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SITE:

Item 1: Site Cabins: Have noted applicant intends to place an unsightly 2 storey welfare cabin on the front grassed area destroying the existing plants. Where are all cabins for storage of for example, plant / tool sheds?

Item 8: Works Programme: The programme for the 1st four items, site set up to external cladding appear to be understated as reduce the impact of the major construction, noisier, dirtier works to a minimum. Once a contractor is appointed this period may well be extended longer causing more disruption to HC and the neighbourhood extending the programme?

Item 9: Surely the stated hours are for an unoccupied buildings? Would not an occupied building have different times? It must be remembered that the building is more occupied than normal, not just with retirees, but also as Covid 19 restrictions are still being used with many people still working from home.

COMMUNITY LIAISON:

- The 1st sentence says:

'A neighbourhood consultation process must have been undertaken prior to submission of the CMP first draft'. This is the 1st draft and NO CONSULTATION has taken place or commenced. Presume this would also be required by Camden as the building is fully occupied.

- It also States: Consultation Process: 'THIS MUST BE TAKEN IN THE SPIRIT OF COOPERATION, RATHER THAN ONE THAT IS DICTATORIAL AND UNSYMPATHETIC TO THE WELLBEING OF LOCAL RESIDENTS AND BUSINESSES. There has been NO CONSULTATION and the applicant has not followed the essence of the statement.

11. Consultation: Although the Camden Planning advised the applicant to engage with the residents, letters dated 12.05 and 07.12.2021, the applicant has ignored & disregard Camden's advice. The applicant CMP states ' the neighbours residents would be included on the list of properties consulted once the planning application is submitted'. The entire statement is written in a manner that the consultation will happen- as far as aware this has not happened?

27. Services: The response stated in the CMP totally avoids the impact on the existing, as in all utilities services (Thames water, National Grid, EDF BT etc.). It also avoids any impact on the existing occupants and the existing services that are to be removed (water tank, boiler chimney and roof top services distribution etc.) and are not indicated on the applicants proposals.

ENVIRONMENT:

28. List all Noisy Operations: Again the CMP totally avoids answering or providing any information that provides evidence that this issue has been considered & its impact.

It also states 'Will be undertaken by the appointed contractor and this will be provided to Camden Council with the CMP to be submitted with any future discharge of approval conditions'

29. Confirm most Recent Noise Survey: The CMP avoids the survey confirming that one has not been undertaken and would be done before the works begins when in fact does this not normally for apart of an applicants planning submission.

30. Noise and Vibration Levels Out of the Work: Again the CMP totally avoids answering or providing any information approach the same approach as No 27.

It also states 'Will be undertaken by the appointed contractor and this will be provided to Camden Council with

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the CMP to be submitted with any future discharge of approval conditions'.

31. Construction Demolition- To Prevent Noise and Vibration: Just quotes legislation. Again the CMP totally avoids answering or providing any information. There is no evidence of how these works are to be executed and their impact on the existing building, occupants or neighbourhood.

It also states 'Will be undertaken by the appointed contractor and this will be provided to Camden Council with the CMP to be submitted with any future discharge of approval conditions'.

35. Details Monitoring Noise, Dust and Vibration: See above No 31.

36. Air Quality Assessment and Dust Risk Assessment: Again the CMP totally avoids answering or providing any information to mitigation.

It also states 'Will be undertaken by the appointed contractor and this will be provided to Camden Council with the CMP to be submitted with any future discharge of approval conditions'.

37. Confirm GLA's Level of Dust Impact Identified in No 36 Addressed: Again the CMP totally avoids answering or providing any information to mitigation.

It also states 'Will be undertaken by the appointed contractor and this will be provided to Camden Council with the CMP to be submitted with any future discharge of approval conditions'.

40. Asbestos Survey and Findings: The CMP confirmed that no survey had been undertaken. HC is an old building. The applicant no doubt be are from the freeholder that Asbestos has been removed from the building in the past. Any thing on the roof such as tank enclosure boiler chimney & where the new staircase have to broken through between the new 3rd & existing 2nd level.
