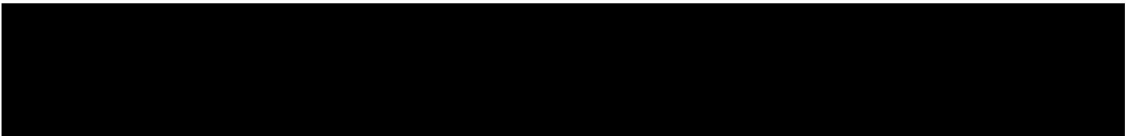


Subject: Objection to Planning Application 2021/3839/P



Dear Kate,

Howitt Close has been the home of my husband and I for 37 years. We bought our flat and moved in here a few months after we were married. We know this building like the backs of our hands and love all its aesthetic and authentic 1930s' Art Deco details. The residents of Howitt Close have a strong and warm community bond, and every single one of us is devastated by the freeholder's plans for our beloved building.

1. Design – Architecture

With regard to the claims made in the 'Heritage Statement' by the Cirencester-based Cotswold Archaeology Society (a more inappropriate and ill-fitted organisation would be hard to find to comment on a vintage urban building in London!), their statement that "the flat roof form of the building is uncommon within the Conservation Area sub-area and does not contribute positively to the character and appearance of the area" is clearly untrue.

- There are many flat-roofed buildings from this period in the locality – four in Glenmore Road, one in Glenilla, two on Belsize Grove and possibly four separate substantial buildings on the corner of Belsize Grove and Haverstock Hill, three on Eton Villas, not to mention the art-historically iconic flat-roofed Isokon building on Lawn Road in Belsize Park – one of London's most famous and quintessential historical buildings from the 1930s! The Cotswold Archaeology Society even go so far as to say in point 4.4 that "the building may be considered to incorporate an 'unfinished' appearance through the lack of a mansard storey"! One can but wonder whether any one of the Cotswold Archaeology Society has any art historical qualifications to comment on this type of architecture or has bothered to visit the London Conservation Area of Belsize Park from Cirencester! They don't seem to know that flat roofs are

absolutely indicative of Art Deco buildings from this period or that Howitt Close was built in the early 1930s, not the 1920s.

- The Cotswold Archaeology Society states in its point 3.9 that Howitt Close’s “aesthetic appeal is primarily derived from its overall form”. Then it contradicts itself by trying to suggest that a mock Edwardian mansard-style roof, like those on the houses up the street, will benefit the building! Why would an Edwardian-style roof be of any benefit to an authentic Art Deco building? Howitt Close is unique and special because of its intrinsic historic qualities! Why would an Art Deco mansion block want to replicate the roof style of an Edwardian house? This would only completely ruin its historic and aesthetic integrity.

- As for the Cotswold Archaeology Society claiming that Howitt Close does not contribute positively to the character and appearance of the area, it is listed in Camden’s own Belsize Conservation Area statement as one of the ‘BUILDINGS AND GROUPS OF BUILDINGS THAT MAKE A POSITIVE CONTRIBUTION TO THE CONSERVATION AREA’!

- The Cotswold Archaeology Society’s point 3.7 states that “the western elevation appears diminutive alongside residences with pitched or mansard roofs”. But this is where the building appears the tallest, as the lower ground floor on this half of the building actually makes the building 4 rather than 3 levels (with Freshwater’s proposed extra storey and mansard roof, it will be 5 levels!). Their point 3.16 states that “the flat roof of the building contributes to its diminutive form, which is visually subservient to neighbouring terraced houses, despite its overall size” while in point 3.15, it states that “the building sits comfortably within its position”. How can it “sit comfortably” and be “diminutive” at the same time? Even in Camden Council’s own 7/12/20 pre-app response to the applicant, you state about Howitt Close: “As it stands, it is considered to be a complete composition of considerable charm which, through good design suits its context well. The site is prominent, being adjacent to a T-junction and addressing a curve in the road. This means that it is visible in long views along Howitt Road from the north-east and along Glenilla Road from the north-west. It is also freestanding, set apart from surrounding buildings, particularly to the south-west, and this means it is highly visible. Any alterations to its height would therefore be visually prominent from various points in the streetscape.”

In reality, the building fits in perfectly with the height of its surroundings and the extra floor will cause it to dominate the Conservation Area.

- Knowing the building as well as my husband and I do, we are deeply concerned about the applicant’s omissions as to where they are going to place the rooftop water tanks, rising water pipe (RWP), soil vent pipe (SVP) and boiler flue. These will need to be placed on top of the proposed new floor and cause even greater height to the building, a fact that the applicant has not disclosed.

- Finally, the National Planning Policy Framework (NPPF) states in paragraph 203: “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

The extra floor (and further amenities) on top of Howitt Close will absolutely destroy its aesthetic appearance and historical integrity. When I look at the design drawings, it brings tears to my eyes. It will also impair the appearance of the entire Belsize Conservation Area, as the building is clearly visible all the way down Howitt Close and Glenilla Road and will impact directly on the light and privacy of houses on Howitt Road, Glenilla Road, Belsize Park Gardens and Belsize Grove.

I believe that Camden Council is responsible for preserving historic and aesthetic buildings, as well as preserving the well-being of neighborhoods in their constituency!

2. Amenities

- The applicant has not included a Daylight and Sunlight Report, despite Camden Council mentioning that “the additional height of the building – by virtue of the distance from nearest windows, in addition to its set back and sloping form – would prevent a noticeable impact on light received by the rear windows of those properties on Belsize Grove and Belsize Park Gardens.”

I would propose that Camden Council request a Daylight and Sunlight Report from the applicant before making a planning decision.

3. Pedestrian and Vehicle Access, Roads and Rights of Way

- The planning application asks ‘Is a new or altered vehicular access proposed to or from the public highway?’

The applicant replies ‘No’. But the streets, including Howitt Road, Glenmore Road and Glenloch Road, are too narrow to provide heavy truck vehicular access (nothing larger than a very small van would be able to go down Howitt Road). The only street wide enough to give access to such trucks is Glenilla Road, which has been and is still suffering from several existing building developments on their road. Therefore, the site will definitely need new public rights of way provided within and adjacent to the site.

- The planning application asks “Do the proposals require any diversions/extinguishments and/or creation of rights of way?”

The applicant says ‘No’, but the CMP admits that Howitt Road will need to be completely blocked off for an (unspecified) period.

4. Fire Regulations

We have significant concerns over fire regulations regarding the additional floor, particularly on the escape routes and the poor accessibility to the new floor for fire engines, thus putting the existing building at a greater risk.

5. Waste and recycling provision

Does every unit in this proposal (residential and non-residential) have dedicated internal and external storage space for dry recycling, food waste and residual waste?

The bins for the food waste and recycling are always overflowing on the site and there is no room for further bins.

6. Surrounding Green Space

- In the application form, Camden asks “Will the proposal result in any loss of residential garden land?” The applicant replies “No”.

However, they are intending to put their ‘2-storey welfare cabin’ (workmen’s hut) atop our centerpiece rosebed that we have cultivated for over 30 years. The scaffolding around the building will also destroy all of the well-kept gardens surrounding the building.

7. Trees and Hedges

When asked in the planning application: “Are there trees or hedges on the proposed development site?” Freshwater have admitted “Yes”.

Camden Council goes on to say: “If Yes... you may need to provide a full tree survey, at the discretion of your local planning authority. If a tree survey is required, this and the accompanying plan should be submitted alongside your application. Your local planning authority should make clear on its website what the survey should contain, in accordance with the current 'BS5837: Trees in relation to design, demolition and construction - Recommendations'.

Freshwater have not provided a full tree survey.

8. Construction Management Plan (CMP)

- The applicant listed the CMP as being included in their planning application, but it was missing from it. When this was pointed out to Camden’s Planning Department, Kate Henry requested the CMP from the applicant, who finally submitted it on 27 October, although the original deadline for any objections to the planning application was 23

October – four days earlier! The result was that Kate Henry rightly extended the consultancy period for three more weeks from 27 October until 17 November.

The draft CMP had been completed in March 2021 and there had been no changes. However, we can understand why the applicant didn't want to include it and tried to dissemble the facts in order to omit it. Many of those who submitted their objections earlier wouldn't have known about its inclusion in the application and therefore would not have had the opportunity to respond to it.

In the draft CMP, it states:

- “A neighbourhood consultation process must have been undertaken prior to submission of the CMP first draft.”

This was clearly not done. It also says:

- “This consultation must include all of those individuals that stand to be affected by the proposed construction works. These individuals should be provided with a copy of the draft CMP, or a link to an online document. They should be given adequate time with which to respond to the draft CMP, and any subsequent amended drafts. Contact details which include a phone number and email address of the site manager should also be provided.”

No site manager contact details have been provided.

- It also states: “Significant time savings can be made by running an effective neighbourhood consultation process. This must be undertaken in the spirit of cooperation rather than one that is dictatorial and unsympathetic to the wellbeing of local residents and businesses. These are most effective when initiated as early as possible and conducted in a manner that involves the local community. Involving locals in the discussion and decision-making process helps with their understanding of what is being proposed in terms of the development process. **The consultation and discussion process should have already started, with the results incorporated into the CMP first draft submitted to the Council for discussion and sign off.**”

The applicant's attitude has been entirely dictatorial and unsympathetic to the well-being of local residents and business. There has been no spirit of cooperation and no initiation of discussion or consultation by the applicant, and therefore no results incorporated into the CMP first draft being submitted to the Council for discussion and sign off. Although the freeholder has admitted that the building is not vacant, they have treated it as if it is a vacant building by not even informing or consulting whatsoever with the leaseholders.

The CMP also includes the following:

“11. Consultation

The Council expects meaningful consultation. For large sites, this may mean two or more meetings with local residents **prior to submission of the first draft CMP.**

Evidence of who was consulted, how the consultation was conducted and a summary of the comments received in response to the consultation should be included. Details of meetings including minutes, lists of attendees etc. should be appended.

Please provide details of consultation of draft CMP with local residents, businesses, local groups (e.g. residents/tenants and business associations) and Ward Councillors.”

Needless to say, there has been no ‘meaningful consultation’ by the applicant with local residents, businesses, local groups and Ward Councillors prior to submission of the first draft CMP and certainly no evidence included of “who was consulted, how the consultation was conducted and a summary of the comments received in response to the consultation”.

Camden Council, in their pre-application advice, has repeatedly advised that the applicant consult with the residents, as well as local residents and groups and Ward Councillors. This advice was continually and completely ignored.

12. Bad Conduct and Improprieties by the Applicant

I have to say that I think the applicant is seriously running roughshod over Camden Council, as well as the Howitt Close leaseholders and their neighbours. **They didn't listen to any of the important, even crucial, advice that Camden Council gave them to:**

- consult with the residents of the building and the affected neighbourhood.
- submit the Construction Management Plan (CMP) in their original planning application (no doubt because they knew it would not be well received by the Council or all those affected by the application), yet dissembled and tried to disguise the fact that they hadn't included it, hoping that no one would notice it wasn't there!

The result is that the neighbourhood was left to find out about a planning application that would devastate their lives by a small yellow sign on an out-of-the-way lamppost. It is actually astonishing that people were even alerted at all! If it hadn't been for an astute resident leaseholder inspecting the sign and informing others, and a dedicated leaseholder pounding the streets for days handing out posters, we might all still be in the dark.

It is such a travesty that rich and powerful freeholders like this think they can get their own way using nefarious means, and run roughshod over everyone from government councils to whole neighbourhoods.

Despite the fact that Camden Council will receive approximately £350,000 from the applicants towards affordable housing (which they admitted to the Council is not affordable housing), I think that Camden needs to put its foot down and not allow large and wealthy landlords to walk all over them – and us!

I would ask you to please help us fight off large, greedy landlords whose only intention is to gain even more financial clout. They disrespect and trample over anyone and anything that gets in the way of them achieving their pernicious plans until unique historic buildings like ours are destroyed and indeed reduced to a mere footnote in history.