

**From:** Kate Henry  
**Sent:** 21 December 2022 15:15  
**To:** Planning Planning  
**Subject:** FW: Planning Application 2022/3635/P

Please log as objection to 2022/3635/P

Thanks

Kate Henry  
Principal Planning Officer



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**From:** Sally McFall  
**Sent:** 21 December 2022 13:49  
**To:** Kate Henry <  
**Subject:** Planning Application 2022/3635/P

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Kate,

**Preserve or Enhance?**

According to Camden Council's *Belsize Conservation Area Statement* under 'GUIDELINES', pg. 38, UDP [Unitary Development Policy] EN31: **"The Council will seek to ensure that development in conservation areas preserves or enhances their special character or appearance, and is of high quality in term of design, materials and execution."**

Further on, under 'NEW DEVELOPMENT', pg. 40, BE19, it states: **"New development should be seen as an opportunity to enhance the Conservation Area. All development should respect existing features such as building lines, roof lines, elevational design and, where appropriate, architectural characteristics, detailing, profile and materials of adjoining buildings."**

And finally, under 'ROOF EXTENSIONS', pg. 41, BE26, it states: **"Roof extensions and alterations, which change the shape and form of the roof, can have a harmful impact on the Conservation Area and are unlikely to be acceptable where:**

- **It would be detrimental to the form and character of the existing building...**

• **The roof is prominent, particularly in long views."**

These statements of Camden Council's own policy for the Belsize Conservation Area should alone be enough to have led to the refusal of both planning application 2021/3839/P and the slightly revised 2022/3635/P.

There is honestly no way that this proposed development either preserves or enhances the Conservation Area. Not one of the many submissions regarding this application (and I have read them all!) believes that it would preserve or enhance the Conservation Area. And yet Mr David McKinstry, Camden's Conservation Officer himself, in his email of 13 July 2022, stated that he, along with the Planning Officers assigned to this application, will support this revised application, with a few conditions "that can be discussed without too much complexity arising".

**Transparency?**

When I spoke to you on the phone, Kate, I asked you why this email from Mr David McKinsky was posted on the application's portal on 30 October 2022. You replied that it was for the sake of transparency. But if it was posted to be 'transparent', why was it not posted until 30 October, over a month after all the other planning application documents had been posted by Camden Council and well after the initial deadline given for any objections?

I have since discovered that it was only posted after a Howitt Close leaseholder asked to see the minutes of the 'workshop' meetings held on 13/3/22, 21/4/22 and 14/6/22 mentioned in the Design and Access Statement Addendum dated 16/8/2022, in which Bubble Architects state: "The Officers have confirmed that the revised design shown here had addressed their previous concerns." These meetings were also mentioned in the applicant's Planning Statement: "Since concern was raised during the previous application, three further design workshops have been held with officers at Camden Council, including the Conservation Officer. Details of those meetings are set out in the Design and Access Addendum, which accompanies this submission. Specifically we note that officers confirmed via email on 13 July 2022 that officers supported the scheme which forms this application."

You wrote back to the leaseholder to say that: "There are no minutes from the meetings in question as they were informal workshop style meetings. I have added a copy of the Conservation Officer's email (dated 13/07/2022) to the website." So, transparency was not the Council's original intention, but rather urged on them by a Howitt Close leaseholder.

**Clear Minds?**

I also asked you in a phone conversation, Kate, why you supported this application after refusing the previous application 2021/3839/P. You said, "It's an improvement" (presumably on the previous application). But your decision should not be based on whether "it's an improvement" compared to another dreadful roof development scheme, but whether it "preserves or enhances the Conservation Area", which it does not.

I then said that David McKinstry's email indicated that he and the Planning Officers had already made up their minds to grant planning permission. I said that it was as if a judge and jury had already announced their verdict before the court hearing had even begun. You said, "It's not like a judge, who has to have a clear mind"(!) And why should Planning and

Conservation Officers not have clear minds? It is blatantly obvious that if they think this application will ‘preserve or enhance’ the Belsize Conservation Area, and that they can’t even adhere to their own Conservation Area policy, they certainly do not have “clear minds”!

Apart from the above glaring reasons to object this application, there are so many other things that are wrong with it, which I will address as follows.

### Heritage

It has been acknowledged that Howitt Close has been listed, on pg. 31 of the *Belsize Conservation Area Statement*, as one of the ‘BUILDINGS AND GROUPS OF BUILDINGS THAT MAKE A POSITIVE CONTRIBUTION TO THE CONSERVATION AREA’.

Despite the applicant’s vain and cynical attempts to discredit Howitt Close, through their Heritage Statement Addendum, as not being a building of note in the area and undeserving of preservation, The Twentieth Century Society, The Belsize Society, the Heath and Hampstead Society and the Belsize Conservation Area Advisory Committee, have all disagreed, not to mention hordes of Howitt Close residents, leaseholders and neighbours.

As mentioned, the building is contemporaneous with the famous Grade 1-listed Isokon flats in nearby Lawn Road and deserves a similar notoriety for its historic integrity and architectural elegance.

Cotswold Archaeology cites the building’s architects, Henry F. Webb & Ash, as insignificant and unworthy, even though they have a Grade II-listed building and the celebrated Ambassador Cinema to their name! Barbara Abraham, in her objection, has done extensive research into Henry F. Webb & Ash and shared far more about them than Cotswold Archaeology either chose disclosed or bothered to find out. In fact, there is no other company or organisation whatsoever (other than Cotswold Archaeology) whom the applicant has managed to drum up to support their claim that Howitt Close is not worthy of heritage protection.

It is downright satirical that a member of a countryside archaeology company, Duncan Coe (who has no qualifications whatsoever as an architect himself), has pompously purported his opinion on a 20<sup>th</sup>-century urban development. It smacks of desperation on the part of the applicant, who seems to have no concept of the purpose of, or how to go about, maintaining a building’s historical integrity.

In their first design, the applicant suggested erecting an Edwardian roof on top of a 1930s’ Art Deco building. When it was pointed out how ludicrous and inappropriate that was, the applicant then came up with a “contemporary” design, which is equally unsuitable for a 1930s’ building! What seems obvious to most of the objectors about what is appropriate and needed to preserve a building’s historical integrity seems completely lost on the applicant (and on Camden Council, for that matter).

Unfortunately, Camden Council has claimed that a local listing, applied for by The Belsize Society and supported by The Twentieth Century Society and Heath and Hampstead Society, is irrelevant for Howitt Close, as it is protected by being in a Conversation Area. But clearly, it is not protected by being in a Conservation Area, or we wouldn’t all be in this ridiculous

predicament of having to defend, and fight to preserve, a historical landmark building in a Conservation Area!

### **Design**

Planning consultants Firstplan and a number of objectors with architectural expertise have done some thorough analyses of the applicant's development plans.

I agree with Firstplan that "the [lack of] detailing [of the extra storey] would continue to be out of keeping with the wider building" and "represent a top-heavy development in the context of the existing property, diminishing the prominence of the rendering on the upper floor, which currently acts as a successful termination to the building." The applicant's design for an additional storey is definitely not sympathetic to the rest of Howitt Close and this will be extremely noticeable within the Conservation Area, especially in the very long views of the building from Howitt Road and Glenilla Road.

It was pointed out that the top storey façade of Howitt Close was stuccoed and painted white by the original architects, instead of continuing with the brick façade of the underlying stories. This was a clever device to make the building less oppressive, as the white dissolves into the background of the sky more easily and gives the building a lighter presence in its setting within the Conservation Area. This ingenious aesthetic device would be completely ruined by plopping an additional brick storey on top of the white facade and would entirely thwart the architects' intentions and inspired vision.

The design of the windows in application 2022/3635/P is also incongruent with the rest of the building, which has the Crittall windows that are so prevalent and beloved of the 1930s' time period.

### **Height**

Planning consultants Firstplan have also shown, in their Figure 6, that the estimated height "and massing visible along Howitt Road" would be higher and have a much heavier impact than the applicant's drawings depict. In truth, the extra storey would be a prominent eyesore in the Conservation Area. The applicant's drawings are flawed in many respects.

The additional height would also affect the daylight and sunlight accessible on many properties on Howitt Road, Glenilla Road, Belsize Park Gardens and Belsize Grove. The applicant has done nothing to check how these residents would be affected. It should therefore be a requirement by the Council for the applicant to carry out a full Rights of Light daylight/sunlight assessment to establish the effects of the added height on neighbouring buildings before granting planning permission.

The increased height will also affect the privacy of these same properties, whereby those that are currently not overlooked would then be so with the additional height of the storey's windows.

### **The Construction Management Plan (CMP)**

The CMP is a hastily and insufficiently compiled document that ignores and emits a number of major issues. I have detailed many of these in my objection to planning application 2021/3839/P (below), but I would like to add or reiterate the following:

- The applicant's depiction of solar panels would be insufficient as an energy source for the building. The panels would need to be significantly larger, which would add to the height and bulkiness of the applicant's revised roof design.
- There is no detailed account of how the applicant would approach the entire drainage system, which would have to be completely revamped and reconfigured at an enormous expense, and may not even be possible. I note that David McKinstry in his email of 13.7.22 expresses that Planning Officer Bethany Cullen is "unsure about how successful the proposed downpipes on the extension are in relation to the composition as a whole". She is absolutely right to be unsure, she should be downright doubtful!
- There is no mention of the water storage tanks presently on the roof of the building and where they would be placed (undoubtedly because they would also add to the height of the building) or how water storage facilities would be provided.
- No mention is made of necessary vents or of beams to support the extra weight of the additional storey, which will also add to the height of the extra floor.
- As mentioned in one of the submissions, there is evidence of major subsidence in the driveway in front of the building close to the boiler room. The reasons for this subsidence would have to be investigated before any development took place.
- Finally, the Council states (in bold!) in the CMP under 'Community Liaison' (as well as in many of their letters to the applicant) that: "**A neighbourhood consultation process must have been undertaken prior to submission of the CMP first draft.**" The CMP is dated March 2021 and, needless to say, absolutely no consultation process has taken place with the neighbourhood, nor the residents and leaseholders of Howitt Close, to date. The applicant has completely and continually ignored this condition, yet the Council seems to be turning a blind eye to this requirement if they are already acknowledging their support for this application.

#### *Applicant's Carelessness with the Facts*

As mentioned by other objectors, the applicant has made many errors in their application.

- They continue to refer to the 'mansard' roof, which is no longer in their design (they don't even seem to understand the meaning of this word).
- They refer to Howitt Close as a 1920s' building, although it was built in 1933.
- They refer to the roof as having "an unfinished appearance", despite it having been established that Art Deco buildings of this period had flat roofs.
- The applicant's visualisations are flawed, particularly in the depiction of the windows on the side of the new building facing Glenilla Road. As already noted, the real proportions and visual impact of their virtual depictions are distorted, whether this be a lack of professionalism on the part of the architects or on purpose. I note that David McKinstry in his

email of 13.7.22 has asked for “the submission of more detailed section drawings”. Indeed, more detailed and more accurate drawings should be submitted.

- There are many contradictions about whether the additional storey will lead to ‘a greater presence on the street’ or ‘not form a dominant presence’ and ‘achieve an understated character’.

The amount of carelessness or unprofessionalism in this application, by so-called professionals, should be noted and considered. It reeks of haste and desperation in getting this application passed and does not show the necessary care of duty.

### **High-Quality Materials and Workmanship**

The applicant has said it will be using high-quality materials, although this seems to be one of the unresolved conditions stated in David McKinstry’s letter of 13.7.22: ... if we do recommend approval, we attach a condition for a sample panel of materials to ensure we are happy with the quality of the workmanship etc. We also suggest the submission of more detailed section drawings etc. so we can fully understand the depth of window reveals etc. Beth has also mentioned that she is unsure about how successful the proposed downpipes on the extension are in relation to the composition as a whole...”

Has Camden Council received a sample panel of materials from the applicant, and how can they guarantee that the applicant will adhere to their promised materials and workmanship?

I attach a photo of the quality of materials and workmanship the applicant freeholder has produced in the past for Howitt Close. They bricked up a side door to a ‘trunk room’ so badly (the colour of the new bricks didn’t even come close to matching the original bricks and the bricklaying was dreadful) that the Tenants’ Association at the time complained about the extremely poor quality of the work. In response, during the next major refurbishment, the freeholder simply rendered over the whole wall, up to the conduit that supplied the outside light on the corner, with cement. When the Tenants’ Association complained about that despicable mess, the freeholder attached a trellis to the cement wall to cover it up. As you can see, it looks appalling and was an alarming desecration of the building. And neither the freeholder nor anyone since has succeeded in getting any plant or vine to grow on this cement abomination to disguise it, not for lack of trying.



It was this sort of consistently shoddy workmanship and use of inadequate materials by the freeholder that led the leaseholders to band together to successfully form a Right to Manage Company to take over the management from the freeholder in order to rescue the building from further destruction. We are now having to band together yet again to rescue our building from ruin by the freeholder through a collective enfranchisement to purchase the freehold of the building, which Freshwater has attempted to delay as much as possible until it receives planning permission for this devastatingly destructive development.

### **Setting a Dangerous Precedent!**

In the larger scheme of things, I am deeply concerned that if Camden Council grants the applicant planning permission for this development that it will set a precedent for any historic building, including others with significant heritage assets and significance, to be prey to developers running roughshod and destroying their historical integrity. Countless other historic buildings of merit will become vulnerable to this exploitation by freeholders and would be ruined. And being part of a Conservation Area will provide no protection for these buildings. I beg the Planning and Conservation Officers to think of the long-range and larger consequences and repercussions of their decision in this case.

### **Conclusion**

Having read every single submission to this planning application 2022/3635/P for a roof development, **it is clear** that not one person has said that they think this application is a good



idea, or a suitable or worthy design, for Howitt Close. And yet, strangely, the two Planning Officers in charge of the application, and the Conservation Office whose job it is to protect the Belsize Conservation Area, think otherwise.

So, I can only ask: Why is this not clear to the Conservation Officer and Planning Officers? What has clouded their minds? Is it the £250,000 that the applicant will pay the Council, potentially towards 'affordable' housing (which no one is pretending that these 7 flats will be), if it grants the applicant planning permission? Or is it that the applicant has paid Camden Council for pre-application advice and meetings and the Council now feels obligated to support the application after taking their money and proffering their advice? Or is it a bit of both? Or something else altogether?

I don't know. But what I do know is that for the sake of a mere seven flats situated extremely indecorously on the roof of the currently beautiful Howitt Close, the Council is willing to ruin an historic landmark and throw 46 leaseholders and residents, their many wide-spread neighbours who will also be significantly affected by this development and the entire Belsize Conservation Area to the wolves, just to line the pockets of the Council and the greedy freeholder, who is one of the richest and most powerful landlords in London. I'm surprised that a Labour-run Council would play ball so willingly with die-hard capitalists who are blatantly only interested in their own gain.

I can only ask the Planning and Conservation Officers to please think again, and to try to clear your minds. I would like to ask that each one of you to put your hands on your heart and swear to yourself that you truly believe that this development will "preserve" or "enhance" the Belsize Conservation Area.

I just can't believe that you can honestly justify supporting this unworthy application and I appeal to your consciences to reconsider.

Kind regards,

Sally McFall

45 Howitt Close

**PLEASE SEE BELOW MY PREVIOUS OBJECTION TO 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 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 neighbourhoods 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 centrepiece 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 fast 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.

Yours sincerely,

Sally McFall

