

20 August 2025 JDMC Speaker Statements

#4 - 23/04643/OUT Former NIAB site – Local Resident

These representations are made on behalf of the residents of Howes Place.

Unfortunately, the residents of Howes Place are unable to make representations in person or virtually at this meeting and as a result, we have submitted written representations to all members of the JDMC in advance of the meeting. A summary of these representations is outlined below:

We welcome confirmation from the applicant on the Parameter Plan (Landscape & Open Spaces) that the redundant existing access points between Howes Place and the proposed development will be closed off with infill planting of pleached lime trees, hedges and grass verges along Howes Place in a manner consistent with the formal landscaping of Howes Place.

However, we urge members of the JDMC to consider attaching an informative to this planning application, in the event that permission is granted, to ensure that a precommencement planning condition is attached to any reserved matters permission for landscaping identical to Condition 43 attached to the extant planning permission (21/03609/FUL).

After much deliberation, following the failure of the applicant to explore the potential for the proposed changes to the Howes Place access arrangements to Chapter House under this amended planning application, as set out by the residents of Howes Place and as directed by the JDCC at the meeting on 23rd April 2025, we have registered three compliance cases with the local planning authority in a further attempt to secure positive planning outcomes for the Howes Place Conservation Area and the residents of Howes Place and Chapter House.

- The first relates to the alleged unauthorised development which was undertaken by the applicant during the conversion of the former NIAB HQ building (now known as Chapter House), under prior approval 20/01501/PRI030. This facilitated the establishment of Howes Place as the main address and entrance to Chapter House and has CAUSED HARM and CONTINUES TO CAUSE HARM to the special arcadian character and amenity of the Howes Place Conservation Area and has introduced unnecessary highway safety risks.
- The second relates to the alleged failure by the applicant to plant trees of an appropriate size and species to replace three pleached lime trees which form part of the Howes Place Conservation Area, and are protected under Tree Preservation Order, and which have been uprooted / fallen or have died. This is a clear indication of the lack of any real interest from the applicant to make a positive contribution to the local character and distinctiveness of the Howes Place Conservation Area.
- Finally, the third relates the alleged failure by the applicant to satisfactorily comply with two pre-occupation planning conditions (for the provision of pedestrian and cycle linkages and cycle parking facilities), as required under prior approval 20/01501/PRI030, prior to or since the occupation of Chapter House in May 2022. This has reinforced and further intensified the use of Howes Place as the main address and entrance to Chapter House.

We urge members of the JDMC to ensure that these three compliance cases are fully investigated and satisfactorily addressed, taking full account of the detailed assessment and comments within the Howes Place Conservation Area Appraisal.

It is the duty of all of us to make a positive contribution to the local character and distinctiveness, and to preserve or enhance the significance, of the Howes Place Conservation Area.).

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#4 - 23/04643/OUT Former NIAB site – Councillor Simon Smith as a Castle ward member

As noted in the report, the Committee of 23rd April 2025, deferred the original version of this planning application on two grounds:

1. Enable agreement of a series of parameter plans on key structuring and placemaking components together with urban design principles which would set out a framework for the reserved matters stage; and
2. Explore the potential for the proposed changes to the Howes Place access arrangements [to Chapter House] as set out by the residents with a view to securing this as an additional planning condition.

My comments on the revised application are in support of the considered and thoroughly researched representations submitted by Howes Place residents. Their collective objective is to ensure the planning system both protects and enhances Howes Place as an exemplar of urban and landscape design for an arcadian community of peace and tranquillity after the death and destruction of the First World War.

Under the first ground for deferment, residents support the proposals on the Parameter Plan (Landscape & Open Spaces) Drawing No. LWR/PP/4 that the redundant existing access points between Howes Place and the proposed development will be closed off with infill planting of pleached lime trees, hedges and grass verges along Howes Place in a manner consistent with the historic landscaping plan.

In the event of this application being approved, the Committee is requested to add an informative that any future reserved matters permission for landscaping has a pre-commencement condition added identical to Condition 43 attached to the extant planning permission (21/03609/FUL). The reason being to ensure compliance of the condition in advance of commencement of works.

Under the second ground for deferment, the applicant has failed to respond to the Committee's request for positive planning proposals to address the access arrangements to the Chapter House.

Residents have noted the applicant has:

- i) Established Howes Place as the main access to 68 dwellings, which were carved out of the former NIAB HQ building under a prior approval 20/01501/PRI030
- ii) Introduced unsympathetic features comprising palisade fencing along Howes Place to provide an unsheltered secure cycle parking area, mock cobbles up to the Howes Place carriageway to provide a vehicle access / turning point, and parcel / post lockers to enable the delivery and collection of parcels and post for the Chapter House residents.

The access to Howes Place was not designed to accommodate the increased volume of traffic. This has created an otherwise wholly avoidable highway safety risk and harm to the special arcadian character and amenity of the Howes Place Conservation Area.

The Howes Place Conservation Area Appraisal notes "The importance of the area for its homogeneous architecture designed by an eminent architect as well as its strong formal landscape scheme, coupled with mature informal landscape, is at risk of losing its special character through cumulative impact of minor changes." In addition, the appraisal warns, "The buildings and landscape...are potentially at risk of unsympathetic change."

Whilst the application is recommended for approval, the Committee has been previously advised some weight can be given to compliance matters. In this context, residents wish to draw the Committee's attention to three recently registered compliance cases in their continued attempts to secure positive planning outcomes for the Howes Place Conservation Area as follows:

1. Alleged unauthorised development comprising:

The cycle storage area (including palisade fencing) and parcel / post lockers located to the southeast of Chapter House, the undertaking of hard landscaping works (including the introduction of mock cobble paving located to the southeast and northwest of Chapter House) and the introduction of six (6) new rooflights during the conversion of the former NIAB HQ building.

The Committee is encouraged to ensure this alleged breach of planning control is assessed fully and satisfactorily addressed in the context of the comments made in the Howes Place Conservation Appraisal which identified the risk of the area “losing its special character through cumulative impact of minor changes.”

2. Alleged failure to replace protected trees

It is alleged the applicant has failed to replace in a timely manner three pleached lime trees which form part of the Howes Place Conservation Area and are protected under Tree Preservation Order TPO/14/2024 having either died or been uprooted / fallen.

The committee is encouraged to ensure this alleged breach of the TPO is assessed fully and satisfactorily addressed once again in the context of the Howes Place Conservation Report.

3. Alleged breach of a planning condition

It is alleged that the applicant has failed to comply satisfactorily with two pre-occupation planning conditions, as required under prior approval 20/01501/PRI030 for the Chapter House as follows:

- a. Provision of pedestrian and cycle linkages from Chapter House to the wider network to the north and west (i.e. along Lawrence Weaver Road).
- b. The provision of cycle parking facilities for Chapter House.

The above failures have led to a substantial increase in the use of Howes Place at a risk to highway safety, whilst Lawrence Weaver Road

has a purpose built for highway safety traffic light-controlled junction with Huntingdon Road with dedicated turning lanes and pedestrian refuges.

The committee is encouraged to ensure this alleged breach of planning conditions is assessed fully and satisfactorily addressed in the interests of highway safety and the Howes Place Conservation Area.

The Committee is further encouraged to invite the submission of a comprehensive planning application for the provision of permanent cycle parking facilities for the Chapter House as the time-limited approval of the drawings for the cycle parking facilities to the southeast of Chapter House (adjacent to Howes Place) and the unimplemented cycle parking facilities to the northwest of Chapter House expires on 25th October 2025.

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#4 - 23/04643/OUT Former NIAB site – Councillor Payne as a Castle ward member

I write to support the comprehensive comments submitted by Howes Place residents regarding the amended planning application for the NIAB site.

As a Ward Councillor, the key issues requiring committee attention are as follows:

1. Previous failure to address JDCC deferral requirements

While I welcome the Parameter Plan booklet submitted by the applicant, the application was deferred in April 2025 specifically to explore changes to Howes Place access arrangements. **The applicant has made no effort to address this requirement**, instead attempting to redefine the development area through amended descriptions and secondary red lines to avoid scrutiny.

2. Ongoing harm to Conservation Area

The Howes Place Conservation Area Appraisal warns of risks from "cumulative impact of minor changes" and "unsympathetic change." Since 2022, the area has suffered demonstrable harm through:

- Introduction of palisade fencing and unsheltered cycle parking
- Mock cobble paving and vehicle turning areas
- Parcel lockers and increased commercial traffic
- Significant increase in vehicular and pedestrian traffic through the residential area

This has fundamentally altered the "arcadian character" that makes this conservation area special and gives Howes Place its unique sense of place.

3. Pattern of non-compliance

The residents have registered three compliance cases highlighting the applicant's track record:

a) Unauthorised Development - Including cycle storage, palisade fencing, parcel and post lockers, hard landscaping, and six new rooflights undertaken without proper consent during the Chapter House conversion.

b) Failure to Replace Protected Trees - Three pleached lime trees protected under TPO/14/2024 have been lost and not replaced as required.

c) Non-Compliance with Planning Conditions - Two pre-occupation conditions from the Chapter House conversion remain unfulfilled since May 2022:

- Pedestrian/cycle linkages to Lawrence Weaver Road (not provided)
- Proper cycle parking facilities (temporary approval expires October 2025)

Recommendations

Given this pattern of non-compliance and the failure to address the JDCC's specific requirements, I urge the Committee to:

1. **Ensure full investigation** of the compliance cases before determining this application, taking into account the detailed

assessment and comments in the Howes Place Conservation Area Appraisal.

2. **Attach an informative** requiring pre-commencement landscaping conditions consistent with the extant permission (21/03609/FUL).
3. **Require a comprehensive solution** for permanent Chapter House facilities before the temporary approvals expire in October 2025.

The Howes Place Conservation Area represents "historic place making vision" from the post-WWI period. We have a duty to preserve its significance rather than allow further cumulative harm through piecemeal development and non-compliance.

The residents' detailed and thoughtful submission demonstrates legitimate concerns that deserve proper consideration and resolution before this application proceeds.

Thank you for the time I know you will take to review this application thoroughly.