There are various concerns regarding this application which does not include a full assessment of the development plans or all the proposed changes. There is also a lack of real assessment of any negative impact, e.g. from the proposed doubling of the individual flats to be serviced by the current narrow communal staircase from 2 to 4 flats.

Proposed change of ground floor facade

The application included alterations to the internal configuration and façade alterations to allow for the change of use at ground floor.

However, while it states that the façade will be upgraded to provide better residential aesthetic, the designs submitted propose to move the entrance door of the recently approved ground floor Flat 2 to a communal entrance. Furthermore, it is further proposed that Flat 2’s entrance door will be behind the communal door now servicing the 1st floor and 2nd floor flats, located on the far left of the ground floor façade.

Such a proposal is strongly objected. The said communal entrance door opens up to a narrow staircase with limited space before the steps start. Putting a door as you enter that space will hinder the access to the 1st and 2nd floor flats entrance, increase the footfall in that narrow staircase, and lead to an increase in noise and possible increase of blockage at the bottom of the staircase which serves as the only exit point for the 2 flats above in case of fire. These said negative impacts to the noise, safety, and accessibility of other flats have not been assessed in the application nor whether such a proposed new flat entrance at that area of the building is desirable, feasible and justified, in order to achieve “better aesthetic” to an already approved application. The proposed change is strongly objected.

Proposed addition of a 3rd floor dwelling

In general, the proposed internal configurations of the internal narrow staircase that serves the first and second floors, and the proposed changes to the internal configuration of the second floor, seem to contradict the purpose of this development. As per the drawings in the proposal, in order to access the new third floor, several changes are envisaged. The current staircase leads into the entrance of the second floor flat. It is proposed to move the entrance of the second floor flat to accommodate a new staircase to provide third floor access, thus changing the configuration of the second floor flat by a) reducing the size of the second floor flat to accommodate a new staircase, b) reducing the number of bedrooms of the second floor flat from 2 to 1. Thus in order to create a third floor with one additional bedroom in the building, another bedroom will be lost.

It is therefore being proposed to add more dwellings, more footfall to the narrow staircase, disruption to the leasehold owners and occupiers of the first and second floors, increased weight to an old structure, fire hazards with the addition of an additional kitchen, boiler, etc, and negative impact of noise, increased usage of the building’s common plumbing and drainage facilities thus increasing the risk of blockages, deterioration and leakages, in order to have a net effect of zero additional bedrooms.

Such parameters have not been considered.

The application makes a generic statement that “*it would not result in any significant harm to the amenities of occupiers of neighbouring properties*”. However, this statement is unsubstantiated for the above reasons. Furthermore, there is no noise impact assessment survey submitted, and the fire assessment of the building does not take all the above proposed changes to the internal configuration at ground floor level and at second/third floor level into consideration when delivering its conclusion. It proposes fire safety precautions at second and third floor levels but what about the first and ground floor levels especially in the narrow staircase.

It should be noted that the communal staircase serving the first and second floors is unlikely to be today’s standards to add a third floor, as the self-contained floors were created over 40 years ago: LPA Ref: 34373 - Change of use, including works of conversion, of the first and second floors to two self-contained flats. – Granted 27/07/1982

The same applies for the plumbing and other amenities of the building that have been problematic and subject to failures in the past (including instances where complaints were made to the Council).

Historic issues remain unresolved

There are a lot of historic issues on the ground and basement level of this building with various changes completed without proper approvals and building control.

In addition, there now seems to be a lot of plans for the building which are not being assessed holistically as to their real impact and risks, and whether the old structures / changes made without approvals and building control can withstand.

In light of this new application, previous comments submitted under Prior Application / Approval LPA ref: 2023/2988/P become more important and should also be reconsidered as part of this application.

Procedural inaccurate disclaimers

Finally on a procedural point, the applicants declare formally that Certificate B notices were given to all relevant owners 21 days prior to the application. This was not the case and no notices, as required by law, have been received.