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Application N 2025/0523/P	Consultees Name Richard Simpson for Primrose Hill	Recipient Address  12A Manley Street London	Received 27/03/2025 11:22:52	Comment OBJ	Response PRIMROSE HILL CONSERVATION AREA ADVISORY COMMITTEE 12A Manley Street, London NW1 8LT	
	CAAC	NW1 8LT NW1 8LT			05 March 2025	
					Flat 1 2 St George's Terrace NW1 8XH 2025/0523/P + 2025/0521/L	
					Objection.	
					1. This advice is in three parts: first, addressing the proposed alterations to the Listed Building, secondly addressing the potential impact of the proposals on the amenity of neighbours, and thirdly on the structural stability of no. 2 St George's Terrace and the group of Listed houses in the larger terrace. On this latter issue, the Advisory Committee, exceptionally, has serious concerns that the recent history of structural movement, and the continuing active structural movement, in the group of houses including no. 2, puts the Listed Buildings at risk. We strongly urge that the structural stability of the Listed Buildings is secured before any consents enable works of alteration to be undertaken.	
					Proposed alterations to the Listed Building	
					Changes to lower ground floor and garden	
					2.1 The Advisory Committee objects to the changes proposed to the surviving original plan. On the importance of retaining the footprint and plan form of Listed Buildings in the conservation area we refer to the Planning Inspector's dismissal of appeals at 32A Chalcot Square, London NW1 8YA, decision letter dated 6 March 2023, refs APP/X5210/W/21/3284632 and APP/X5210/Y/21/3284633.	
					These changes include:	
					2.2 Objection to loss of original and surviving front door opening in main front elevation wall, a significant loss of original detail and of plan form.	
					2.3 Objection to change to plan of front master bedroom. The formation of the proposed shower room would disrupt the plan of this major room in the original and surviving plan at this level.	
					2.4 Objection to loss of chimney breast 'nibs' in the kitchen on the existing lower ground floor plan and included in the Heritage Statement at 5.4.6, 7.1.1, and 7.2.1, are to be demolished to accommodate proposed bedroom 2. We would object to this loss of a significant element of the original plan in this space.	
					2.5 Objection to the proposed loss of the original opening in the north wall to the existing kitchen/proposed bedroom 2, loss of a significant element of the original plan.	

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2.6 We note the existence, in the rear garden, of a tunnel structure running between the rear of

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## Comment

the Queen's PH and the Mews. This appears to be part of the original development of St George's Terrace. It is on the land and within the curtilage of the Listed houses and is therefore also Listed. The structure is not identified on the application drawings although reconfiguration of the garden, including steps, is proposed. We strongly urge the full protection of this exceptional historic feature. Any proposed work which might affect it should depend on a full investigation by an appropriate and competent authority, with archaeological and historic building expertise,

Proposed changes to ground floor

approved by LB Camden.

- 3.1. We would want to see the retention of nibs, downstand, and details to retain the configuration of the original division between the front and rear rooms (see Heritage Statement 7.2.2).
- 3.2. We object to the loss of the original window opening in the rear wall to the proposed kitchen.

## General

Response

- 4. We object to the changes which make Bedroom 2 an internal space with neither natural light nor ventilation. Lowering standards of habitable rooms is not acceptable.
- 5. We would want to see all details, internally and externally, including exterior paving, subject to condition to ensure their full consistency with the original historic forms and fabric of the Listed Building.

Impacts on amenity of neighbours

- 6. The rear of Nos 1 and 2 St George's Terrace form a very tight group of buildings with the rear of the Queen's PH and the rear of the houses in St George's Mews.
- 7. The proposed glazed infill would be higher than the party boundary wall between Nos 1 and 2 St George's Terrace: at the foot of the wall, the only bedroom of the basement flat at No 1 St George's Terrace is only lit by rooflights: we would need to see a daylight study on the impact of the proposed extension on this habitable space to protect residential amenity.
- 8. The location of the glazed extension proposed, with its obscured glass roof would also potentially harm neighbouring amenity - including the accommodation above the ground floor at No 2 St George's Terrace - through light pollution. We would need to see full mitigation of this harm.
- 9. We are aware that the Queen's PH has a means of escape in case of fire which leads into the rear garden space of No 2 St George's Terrace. We understand that this means of escape is secured on the leases of the relevant property. We would urge that no consents be granted which put this means of escape in question and lives in jeopardy.

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					Structural issues		
					10. The Advisory Committee, exceptionally, has serious concerns that the recent history of structural movement, and continuing active structural movement, in the group of houses including no. 2, puts the Listed Buildings at risk. We strongly urge that the structural stability of the Listed Buildings is secured before any consents enable works of alteration to be undertaken.		
					11. We strongly advise that in order to protect the special interest of the Listed Buildings, structural survey of the house and its neighbours, for approval by Camden, be secured be any consents enable works of alteration to be undertaken.		
					12. We note that the application includes two submissions by consultant structural engineers. While we do not question the professionalism of these submissions, we note that they do not provide a full structural survey of the house and its neighbours. The structural statement is specifically limited to the construction of the proposed infill extension (1 Introduction). It also points to assessments needed but not currently provided, for example, the consideration of soil conditions in the design of new foundations (Construction methodology 2.2). The drawings also refer to necessary investigations: for example on Section B1-B1 note 1 to F1 refers to the need for trial holes to investigate ground conditions. Given the structural history of the group of Listed buildings, we advise that, exceptionally, such investigations should be completed and submitted with the planning and LB consent applications.		
					Richard Simpson FSA, Chair PHCAAC.		