

Application No:	Consultees Name:	Received:	Comment:	Response:
2019/5518/P	Richard Simpson for Primrose Hill CAAC	27/12/2019 10:24:06	OBJ	<p>ADVICE from Primrose Hill Conservation Area Advisory Committee 12A Manley Street, London NW1 8LT</p> <p>04 December 2019</p> <p>14 Chalcot Square NW1 8YA      2019/5518/P + 2019/5996/L</p> <ol style="list-style-type: none"> <li>1. Strong objection to the further, cumulative, loss of dwelling units at this house.</li> <li>2. The application proposes the joining together of the existing 2 basement flats into 1. While the loss of 1 unit is acceptable under the adopted Local Plan Policy H3, we advise that H3 as stated at H3c applies cumulatively, and this loss of 1 unit follows the loss of 3 units of 6 units in 2005-2007 (refs 2005/5560/P and 2007/0513/P). The present proposal would add to a cumulative loss totalling 4 units out of the 6 units existing in the application property in 2006.</li> <li>3. Policy H3 of the current adopted Local Plan 'Protecting existing homes' states at H3 c that the Council seeks to resist 'development that would involve the net loss of two or more homes (from individual or cumulative proposals), unless they: <ul style="list-style-type: none"> <li>• create large homes in a part of the borough with a relatively low proportion of large dwellings;</li> <li>• enable existing affordable homes to be adapted to provide the affordable dwelling-sizes that are most needed; or</li> <li>• enable sub-standard units to be enlarged to meet residential space standards.'</li> </ul> None of these bullet points apply to this application.</li> <li>4. It is important to understand why the proposal to reduce units in 2005-06 was allowed. The decision was based on specific, circumstantial, grounds not on the policy itself. The officer's delegated report on application 2005/5560/P, which sought, inter alia, 'change of use from 4 self-contained flats to a single family dwelling', stated in response to the PHCAAC's objection to the loss of residential units that 'Policy H3 of the Revised UDP resists the loss of two or more units through conversion. However this application was lodged prior to the revised policy being adopted for development control purposes (11/01/2006). It would therefore be unreasonable to apply it stringently in this case.' The officer's delegated report on 2007/0513/P states in response to the PHCAAC's continued objection to the loss of residential units that 'This issue was dealt with in the previous planning application where the loss of residential units was deemed to be acceptable.' This is incorrect. The 2005-06 report, quoted here, did not state that the proposal was acceptable under the revised UDP policy.</li> <li>5. We advise that, particularly under current housing stress, smaller units should not be lost, and that cumulative loss should be resisted as provided for under policy H3.</li> </ol> <p>Richard Simpson FSA Chair</p>