

Application No:	Consultees Name:	Received:	Comment:	Response:
2019/5997/L	Richard Simpson for Primrose Hill CAAC	27/12/2019 10:41:02	OBJ	<p>ADVICE from Primrose Hill Conservation Area Advisory Committee 12A Manley Street, London NW1 8LT</p> <p>04 December 2019 14 Chalcot Square NW1 8YA 2019/5519/P + 2019/5997/L</p> <ol style="list-style-type: none"> 1. Strong objection to the further, cumulative, loss of dwelling units at this house. 2. The application is ambiguous in terms of the loss of dwelling units. The applicant's description of the proposed works states 'conversion of 2 basement flats into a single dwelling, with internal alterations and rear extension to basement and ground floor flats.' 3. We note that there is no ground floor flat. The ground floor is part of the larger house. 4. But what is the single dwelling identified in the application description? It could mean that the 2 basement flats would simply become 1 (as in the parallel application 2019/5518/P), but that is not what the drawings show. The drawings show the integration of the basement floor with the rest of the house by the insertion of a stair from basement to ground floor. This stair is not shown to be enclosed even by doors but provides open access between the basement and the rest of the house. We note further that the application form itself refers not to the basement specifically, but to the house as a whole, that is no. 14 Chalcot Square. 5. It seems clear that, if approved, this application would allow the occupation of the whole house as a single unit. 6. In that case, the present application would mean a loss of 2 units of the present 3. 7. The loss of 2 units would be contrary to Local Plan policy H3 'Protecting existing homes', which 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"> • create large homes in a part of the borough with a relatively low proportion of large dwellings; • enable existing affordable homes to be adapted to provide the affordable dwelling-sizes that are most needed; or • enable sub-standard units to be enlarged to meet residential space standards.' None of these bullet points apply to this application. We strongly object to the effective loss of 2 units of the present 3. 8. We further note that there has been a significant loss of units in this house since 2006 – from 6 units to 3, and now, potentially, to 1. The proposal to reduce units in 2005-06 was allowed on the following, specific, circumstantial grounds, not on policy grounds. 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

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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.

9. We advise that, particularly under current housing stress, smaller units should not be lost, and that this cumulative loss should be resisted as provided for under policy H3.

10. On the Listed Building application, we object to the proposed rear addition. There are no drawings showing the proposal in terms of the adjoining Listed Building, so the impact of the proposals on the Listed Buildings cannot be properly assessed.

Richard Simpson FSA
Chair
