

Application No:	Consultees Name:	Received:	Comment:	Response:
2021/4063/P	Roger Moran	11/11/2021 14:35:02	OBJ	<p>I am concerned that the application seems to be attempting to regularise the existence of 4 x unlawfully developed one bedroom flats on the first and second floors of the property.</p> <p>In the Application Form for 2021/4063/P, Section 6 (Description of Proposal) describes the proposed development as 'Part two storey and part four storey rear extension and the conversion of two flats on first and second floors into four self-contained units.' Section 25 (Residential Units) of the application form describes the loss of 2 x 60 sq m apartments and their replacement with 4 x 37 sq m units. But it is clear that the first and second floors are laid out as 4 x 1 bedroom units and have been for some time, with the GIA of some of those units being well below the recommended minimum size of 37 sq m.</p> <p>Planning application 2015/2803/P (Application for a Lawful Development Certificate for an Existing use or operation or activity including those in breach of a planning condition) sought to retrospectively regularise the status of 4 flats on the basement and ground floors of 50A Haverstock Hill which were also developed without planning permission. The supporting documentation for 2015/2803/P clearly shows that the first floor was entirely occupied by a single apartment and similarly the second floor. This is further evidenced by the Environment Health inspection report dated 03-Jun-2008 and the Camden Council HMO Certificate of Registration dated September 2007. 2021/4063/P appears to be following a similar strategy in attempting to obtain planning permission for unlawful developments. Broomfield Group Limited were the applicants for 2015/2803/P and Broomfield Group Limited are the applicants for 2021/4063/P. I see a clear and persistent strategy on their part to circumvent the proper planning process and I do not think this behaviour should be accepted by Camden Council.</p> <p>In addition to my concerns about the unlawfulness of the existing units on the first and second floors, I also wish to make the following objections.</p> <p>The proposed apartments will suffer from a lack of natural light. The rear windows of the apartments on the left hand side (as viewed from Haverstock Hill) will be shadowed by the proposed four storey extension. The extended kitchen areas will be the only source of light for the living space in the middle of each unit for the apartments on the right hand side.</p> <p>The proposed apartments on the first and second floors will offer only low quality accommodation, with no internal walls or partitions between the various functional areas; they are essentially no more than bedsits.</p> <p>The provision of eight minimum sized apartments is inconsistent with the Camden Local Plan (2017) in several aspects. It is contrary to the overall aim that the Council 'will not sacrifice housing quality in order to maximise overall housing supply'. All apartments would be less than 50 sq m and therefore suitable only for single-person occupancy under the Department for Communities and Local Government 'Technical Housing Standards - Nationally Described Space Standard'. This is inconsistent with Camden Council's stated intention to encourage a balanced mix of differently sized apartments suitable for families and couples as well as individuals. Restoring the first and second floors to their earlier layout as whole-floor apartments, before they were unlawfully subdivided, should be Camden Council's approach to this application.</p>