

Planning application reference: 2023/4241/P

To whom it may concern, I am writing with regards to the above planning application. A number of my constituents have been in touch to raise their concerns about objections to the proposed building development at 31 Daleham Gardens to replace the building that was demolished in 2019. The proposed development to rebuild 14 flats to replace those that were demolished following the tragic fire in 2017, would help to contribute much needed affordable housing to the local community and I understand that it has been produced in consultation with input from local residents. I'm also aware that some of the objections to the proposed building are concerned about overdevelopment of the site, but I understand that the proposal has already been revised and reduced and will offer 14 new homes to replace the 11 that were damaged in the fire. Please see attached a fuller response to the objections that have been raised, produced by NW3 Community Land Trust. I would be grateful if this could be taken into account when considering the planning application, and the full merits of the application considered.

*Thank you in advance.
Office of Tulip Siddiq MP*



Please support the Planning Application for 31 Daleham Gardens

Introduction:

NW3 CLT Community Land Trust is the first registered North London Community Land Trust and was set up in April 2016. Our not-for-profit organisation has over the last 5 years campaigned for affordable and key workers housing in NW3 and adjoining postcodes, grown our membership to over 150 members, and developed a detailed business plan to develop our first affordable housing project in NW3. We want to help ensure that NW3 is an accessible, socially mixed, and culturally diverse neighbourhood.

Community Land Trusts (CLTs) are community-led local organisations set up and run by ordinary people to develop and manage homes as well as other assets important to that community, such as community enterprises, food growing areas, or workspaces. As a CLT that is focused on housing our main task is to make sure that homes are genuinely affordable, based on what people earn in our area, not just for now but for all future occupiers. You can read our draft allocations' policy on our website at www.nwclt.org.

We are supported by the Community led Housing Hub (<https://www.communityledhousing.london/>) London and the GLA (<https://www.london.gov.uk/>)

NW3 has submitted a planning application to rebuild 14 flats on the site of 31 Daleham Gardens which was demolished in 2019 following a tragic fire in 2017. Our intention is to bring the site back into use to provide much needed housing and by maximising the number of affordable homes available to local people living in NW3 who cannot afford the astronomical local house prices. We hope in a small way help to alleviate the housing crisis which was recently the subject of two programmes on BBC TV

We have undertaken several consultation events with local residents and liaised closely with Camden's planning department in putting together our application.

It has come to our attention that, unfortunately, last week the resident of the property opposite the site circulated a letter seeking to drum up a campaign against the proposals.

We understand that local residents quite rightly have a democratic right to take part in the planning process and raise objections if they wish. However, the letter that was sent round contained several factual inaccuracies and distortions which we want to bring to people's attention before they make up their mind whether to support the application or not. Please see overpage.



The key issues raised in the flyer were:

1. Alleged Massive Overdevelopment

The original building contained 11 studio/bedsit-type flats at an average size of 28m² which is just over half the required minimum size of a modern one-bedroom flat. Our current design provides for 14 adequately sized new homes which can be suitable for families, couples, and individuals.

It is also the case that previous iterations of the design contained 18 homes and so the scheme has been revised downwards quite considerably already.

It should also be noted that during a Design Review Panel (DRP) commissioned by LB Camden which includes several renowned architects and built environment professionals, the panel commented *that 'the revised scale and massing of the project was viewed positively'* This information is readily available on the council's planning portal.

There is no planning policy that requires that the size and shape of an existing building is replicated in a new development even in a conservation area.

Rather than simply reject a larger building as suggested by the objector, the planning department will use objective tests which measure the impact of the proposed building on the adjoining properties and the suitability of the proposals.

2. Flats larger than previous

As well as providing decent sized accommodation, we unashamedly want to provide a balanced community in the new building with a range of dwelling types including three-bedroom homes for families and mobility standard homes for people with disabilities. Further, flats are more generous than previously because most of previous ones were tiny bed-sit / studio style rooms, considered inappropriate for modern day housing of families or individuals.

3. Environmental impact

Six trees will need to be removed from the site to facilitate the development, as shown in the arboriculturists report. Of these, four are small and classed as low quality. One is poor quality and unsuitable for retention, and one is a sycamore of moderate quality. These will be replaced with three trees in the front garden, providing amenity to the street, and two trees in the rear shared garden. Whilst the rear garden has reduced in area, the incoming residents will each have access to a substantial balcony for private amenity space, which is in keeping with amenity planning policy.

While we regret the loss of any trees, we have put in place several strategies to enhance the environment and mitigate their loss including hedging trees to the front garden which will enhance the street frontage. These measures are detailed within the Landscape section of the Design and Access Statement.



In terms of further environmental benefits, the application demonstrates that the scheme overperforms in several areas including a 68% reduction in co2 emissions resulting from integrated Air Source Heat Pumps and PV panels.

4. Poor design

While beauty is in the eye of the beholder, our scheme has been designed by Mole an award winning and respected firm of architects (<https://www.molearchitects.co.uk/>)

Our project design has been subject to detailed scrutiny by the council's planning and conservation team throughout pre-application meetings as well as an independent DRP who commented that *"These features create a building which sits comfortably within its context and enhances the character of the surrounding area"*.

5. Lack of affordability

The whole ethos of Community Land Trusts including NW3 CLT is to maximise the affordability of the homes they build.

Whilst projects need to be viable to attract loans to build the scheme, unlike private developers, CLTs do not seek to make a profit on the homes we build. Every pound of funding available will be ploughed back into the project once borrowing and construction costs are met. We will provide at least 50% of the floor space as affordable accommodation which is a significant achievement compared to many recent developments in the area.

Under the sale agreement with London Borough of Camden we will be committed to provide at least two rented homes for LB Camden housing register nominees, more than replacing the floor area of the original low cost rented studio properties present when the fire took place. The remainder of the affordable accommodation will be provided as discount market sale (DMS) dwellings.

The precise level of discount we can offer on these DMS homes will depend on the cost of construction and the housing market at the time the properties become available, but our aim and current business plan carries build cost contingencies and allows for some fluctuation and currently sees us providing homes for sale at an average of 50% discount on market values.

Unlike shared ownership, residents will not have to pay a rent on the other 50% making them considerably more affordable and a product unlike no other in the borough.

Most significantly, our DMS homes are not subject to the right to buy and there will be a legal covenant within the s106 agreement that ensures they remain affordable in perpetuity. Quite simply, we are providing homes that will remain affordable forever.

6. Overlooking



The design responds to planning requirements to avoid windows looking directly at other existing windows. The overlooking of communal garden space is not a planning issue; however, we have sought to minimise the number of windows facing the adjoining children's centre and have adopted measures to avoid overlooking such as higher-than-normal sill heights where necessary and new tree planting. We will be happy to deal with any concerns the children's centre have should the need arise.

7. Parking issues

The scheme will be car free. Unlike existing residents, new will not be allowed to apply for a car parking permit apart from very specific circumstances e.g., disability etc.

Normal traffic regulations will apply to deliveries etc. We will be encouraging cycling and provide more than sufficient secure cycle parking on site.

8. Creation of a local park.

As recognised by the letter of objection sent to the planners, the retention of the site as housing complies with local planning policies and the London Plan.

9. Lack of transparency

As the objector knows, NW3 is an organisation made up of residents who have volunteered hundreds of hours of their time over many years to try to improve the community in their area. Our regular meetings are well publicised and are open to anyone in the area to attend and always will be. Our passion and commitment as well as our proven competence has led to us securing funding from the GLA to support the design process and allowed us to successfully negotiate the purchase of the site from LB Camden. We have always demonstrated due diligence and transparency with both LBC and the GLA as well as members of the public.

It is deeply disappointing that the objector, who we understand is familiar with the work of the CLT, implies that the group may have other motives for our involvement in the site. We trust that other local residents will make up their minds based on the merits of the proposals and not be swayed by such unfounded remarks.

We are happy to deal with any questions you may have on the above or wider issues surrounding our application. Please contact us on clt.nw3@gmail.com.

We would urge that you support our application by submitting comments to the via the planning application portal: <https://accountforms.camden.gov.uk/planning-search/> Our planning reference number is: 2023/4241/P. There you will find the link to 'add comments here'. The portal is open until 13 November 2023 for comments.

NW3 CLT