

Mr James Clark
Development Control
London Borough of Camden
2nd Floor,
5 Pancras Square
N1C 4AG

Dear Mr Clark

313 GRAYS INN ROAD WC1X 8PX
Refs: Planning Application 2015/6017

I write on behalf of Mace Housing Co-operative on the above planning application. I have worked with Mace over many years in identifying empty properties that need refurbishing and or converting so that they can be brought back into use to house homeless persons. The majority of these have been supported with Empty Property Grants from the local authority and as part of the Governments Empty Property Community Grants Programme 2012-15.

In partnership with Camden Mace has delivered 33 self-contained homes in the last 4 years in the Borough utilising the Governments Grant and Camden's Empty Property Grants. All the properties are covered by a nomination agreement with the Council.

The application to convert and refurbish 313 Grays Inn Road to 3 self-contained studio flats is another property which has been empty for a long time and in need of a full refurbishment to bring it up to decent homes standard. The property is currently unlivable without major investment for refurbishment works. Mace has applied to the Nationwide Foundation Empty Property Grants Initiative for £175,000 match funded with a Camden Grant of £40,000 to part fund the works. The remaining costs being privately funded. The Council will have nomination rights to the flats.

Given the location of this property it is totally unsuitable for family accommodation. The ground floor entrance between commercial outlets is off a very busy road and footpath, with no external storage space or amenity area. Internally on the ground floor there is no room to store prams/pushchairs etc. which would have to be carried up the staircase. There is no possibility of building an extension to the property to provide extra facilities. The environment of the accommodation for a family would be very poor given the high level of traffic movements and general activity in the surrounding area.

The application to convert the property into 3 single persons self-contained studio flats makes the best use of the property and will meet existing demand.

The proposed flats will be 31.5 sq. m. which is only just below the Councils standard of 32 sq. m. but as explained above there are no possibilities of extending the property. The Council Planning Guidance CPG2 of July 2015 does state that "the Council will be flexible in the application of these guidelines in order to respond to site specific circumstances." At paragraph 4.18 the Guidance states "Self-contained homes providing a floor space below the minimum standards may be considered in exceptional circumstances, for example to reduce the cost of Intermediate Housing to the occupier, however their acceptability will depend on other aspects of the development proposed. Sympathetic consideration may be given where a proposal meets a number of the criteria below:

- Dwellings are targeted at, and affordable to, groups identified by the Borough as being in need".

I would suggest that this application meets this requirement in meeting single homelessness in the Borough and the location of the property not being suitable for family accommodation.

The London Plan Chapter 3 states a floor area of 37 sq. m for single person accommodation, this Chapter refers mainly to new housing developments. But at paragraph 3.36 the plan states "Single person dwellings of less than 37 sq. m. may be permitted if the development proposal is demonstrated to be of exemplary design and contributes to achievement of other objectives and policies of this Plan". Again I would argue that the scheme will meet a known need for affordable single person accommodation to combat homelessness in the Borough.

In summary I would ask you to take into account the above comments in reaching a decision on the application.

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