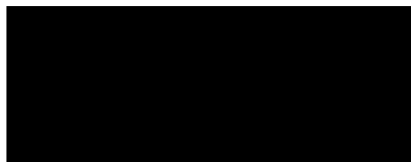


Regeneration and Planning Development Man
London Borough Of Camden
Town Hall
Judd Street
London
WC1H 8ND



22 September 2016

Dear Sirs

Re: Planning Application Consultation
Application reference: 2015/7234/P
Address: 110 Greencroft Gardens, London, NW6 3PH

We are the assured tenants of Flats 13 and Flat 16, 110 Greencroft Gardens, two of the non-self-contained flats at 110 Greencroft Gardens ("the building"). We write in response to the Planning Application Consultation relating to the application dated 21 December 2015 by Timecrate Ltd ("the applicant") for full planning permission for the proposed redevelopment of the building. For the reasons set out below, we object to the redevelopment as currently proposed.

The Planning Statement in support of the application describes the building in its existing configuration as comprising 10 self-contained units and 5 rooms, acknowledging that the historical conversion into this configuration was carried out without planning permission. In fact, the building has historically been made up entirely of rooms which were not self-contained. We have plans of the building in its configuration as at 17 August 1995, already transmitted to this committee showing that there were 17 units, 16 of which were non-self-contained. The current proposal is for there to be a **reduction** in the number of residential units in the building from 15 units to 7, none of which would be non-self-contained, and all aspects of communal living would be lost. Each of these larger units would be **significantly** less affordable than those which exist at present.

The Planning Statement refers to the National Planning Policy Framework (NPPF) and the "golden thread" of sustainable development – and in particular its emphasis on delivering additional homes and meeting the housing needs of the area – but it fails adequately to square its proposed reduction in the number of accommodation units with that principle.

The applicant points to the council's Core Strategy documents, and in particular CS5, CS6 and CS14, emphasizing the council's priority for 2-bedroom units. However, this must be considered in the context that in the proposed development this is to be paid for by the net loss of accommodation units from 15 to 7, and in particular at the loss of existing non-self-contained accommodation. The priority for 2-bedroom units should be seen in the context of **new developments**, and cannot be taken automatically to override the clear objectives in DP9 which are in place specifically to protect non-self-contained developments. The emphasis of CS5 and CS6 are on the needs of the population and local community. There are clear benefits to the community in protecting the limited resources of *existing* non-self-contained accommodation – so that there can be accommodation available for those who work in the area at a time when high market rents make this ever more difficult – and that is why DP9 is in place. Retaining this form of accommodation is essential in maintaining a strong, successful community.

It is also significant that this building has historically been used as lower-rent, higher-density accommodation in an area predominantly filled with lower-density, higher rent accommodation, whilst being a building which is in keeping with the area. This is part of the building's character and distinctiveness, as much as the external façade as the building itself.

Development Policy DP9

Of critical importance is the Council's Developmental Policy DP9 which has to do with housing with shared facilities, and in particular subparagraphs m) to p) of DP9 which relate to the council's policy to **resist** development that involves the net loss or self-containment of bedsit rooms or of other housing with shared facilities:

- m) The applicant is unable to demonstrate that the accommodation is incapable of meeting the relevant standards for houses in multiple occupation, or otherwise genuinely incapable of use as housing with shared facilities.
- n) The applicant does not propose to provide replacement housing with shared facilities
- o) The proposed development does not provide student housing
- p) The proposed development does not provide self-contained social rented homes.

Particularly relevant are the following subparagraphs

DP9.13

"Private rented homes, and particularly bedsit rooms that share communal facilities, are considered to be the main sources of housing for young adults with a limited income. A comparison of 1991 and 2001 Census data suggests that there has been a large reduction in the amount of shared accommodation in Camden in recent years. On the basis of the Camden Private Housing Conditions Survey 2004, we estimate that there are 950 shared dwellings divided into bedsit rooms, occupied by just over 3,000 households. Of all dwellings with shared facilities, the 2004 survey found that 77.7% were privately rented. We therefore seek to retain the remaining provision of bedsit rooms as far as possible."

DP9.14

*"The Council has space standards for self-contained residential accommodation, set out in our Camden Planning Guidance supplementary document. As noted in paragraph 9.8, the Council has also agreed minimum standards for houses in multiple occupations, which apply to specific types of housing including some housing with shared facilities such as bedsit rooms and hostels. Space standards for self-contained residential accommodation are very much higher than space standards for bedsits provided as part of a house in multiple occupation. Existing bedsits are not usually large enough to provide for self-containment without a significant change to the layout of the dwelling, a reduction in the number of bedsits, and an increase in the cost of the accommodation to its occupiers. The Council will therefore **resist** proposals for self-containment of bedsits in most cases."*

DP9.15 to 9.20, which carves out exceptions to these principles, does not apply, and the Planning Statement does not demonstrate that they do. Rather, the Planning

Statement seeks to assert that the existing bedsit rooms, which will be lost if the proposed development goes ahead, are not "the type of bedsit accommodation that policy DP9 seeks to protect". This is without any adequate basis: these units are precisely the kinds of units which are envisaged by DP9.13 and 9.14. It is entirely false to say that there is no "communal" living. WC/shower/bathroom facilities are used by the whole building and are therefore communal. Most significantly, the garden is a communal garden used by all 15 units, in an arrangement which has always worked well and has been highly valued by the buildings occupiers, and has always been an active means of social cohesion within the building. This communal use of a large garden will be lost if the proposed development goes ahead, and it will instead be carved up into separate parts.

The Planning Statement suggests at paragraph 2.32 that "*the existing house comprises 5 bedsit rooms, these are "scattered" within the building of predominately self-contained units*". This "scattering" is the result of the present building configuration that was carried out without planning permission.

Also at paragraph 2.25 the Planning Statement suggests that "*the two bedsits on the first and second floors are not strictly "self-contained" they each have the use of their own WC/shower on the half-landings.*" We wish to clarify that we **do not and never had** "own use" of these WC/showers. In fact these communal facilities, and in particular the only bath tub located on the ground floor, are regularly used by all the residents and their guests. It is false and dishonest to suggest otherwise.

The Planning statement suggests at paragraph 2.33 that "*...there is no "communal" living.*" Again this is entirely false with particular regard to the large rear garden which is and has been shared by all the residents for the past 20 years. The NPPF 8.69 "Promoting Healthy Communities" - The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. The NPPF 8.71 - Local planning authorities should take a positive and collaborative approach to enable development to be brought forward, including working with communities to identify and resolve key issues before applications are submitted.

The Planning Statement suggests that the bedsit rooms are in some way not "true" non-self-contained premises, pointing to the fact that the other flats in the building have been (unlawfully) converted into self-contained accommodation. This is nonsense. The remaining bedsit rooms remain exactly what they have always been. They continue to share their WC/shower/bathroom facilities – not to mention the communal garden – with all the other units in the building (including the self-contained ones). It is noteworthy that the current units in the building which are self-contained have been made self-contained – contrary to the aims of DP9.13 and 9.14 – without planning permission. As the Planning Statement highlights, a number of these unlawfully converted self-contained units breach the new minimum-space standard of 37m² for one-bedroom self-contained flats. The effect of this is mitigated, however, by the fact that even the self-contained flats in the building benefit from the communal amenities of the building, being the additional WC/showers, the bathroom on the ground floor, and the shared garden at the rear. It is therefore more accurate to say that the self-contained flats are not "truly" self-contained, than to say that the non-self-contained flats are not "truly" non-self-contained.

The Planning Statement also suggests, that the three bedsits on the top floor could be converted into a single self-contained dwelling by way of permitted development. However, this is irrelevant, since this is not what is being proposed: the proposed

development is for the top floor to be converted into two separate dwellings (a 2-bedroom flat and a 1-bedroom flat). If this argument were true, then DP4 could almost always be circumvented by saying that *in theory* any building consisting of non-self-contained accommodation could be converted into self-contained units through the permitted development regulations, providing they were limited to one unit per floor.

Affordable housing

Although it is true that DP4 concentrates primarily on estate regeneration and social housing, it is still significant, particularly when considering in conjunction with the considerations above, that there are two assured tenants occupying non self-contained flats. It is evidently intended that our tenancies will be brought to an end in order for the proposed development to go ahead.

Parking

It is an overly simplistic view to take to suggest that, because there would be a reduction in the number of residential units in the building, the demand for on-street parking would not increase. At present, few the occupiers in the building have cars of parking permits. If the proposed development goes ahead and the building comes to be populated as intended by wealthier occupiers, it is likely that at least some of them will apply for parking permits. It is also more likely that as occupiers of larger units they will more likely to have staying guests, more likely to visit by car.

Conclusion

For the reasons given above, we object to this application in its current form. We submit that any redevelopment should retain the existing number of residential units and the arrangements for shared facilities and the communal garden, and preserve the existing assured tenancies.

Yours faithfully


Robert Massari – unit 13 / 110 Greencroft Gardens NW6 3PH

Therese Radmore – unit 16 / 110 Greencroft Gardens NW6 3PH
