

**Ms. L. Eliahoo
31 Riverside Rd,
London, N15 6DA**

Ms S Madondo
Planning services
6th Floor, River Park House
225 High Road, Wood Green,
London, N22 8HQ

19th of July 2023

My second Objection letter to planning application HGY/2023/1199

1. I am Liora Eliahoo, the daughter of Mrs Violet Eliahoo.
2. Mrs Violet Eliahoo ("Mrs Eliahoo") is the registered freehold owner. 31 Riverside Road, London N15 6DA. As a result of a medical condition, Mrs Eliahoo is incapable of managing her own affairs resulting in me being granted power of attorney in this regard on 19 October 2014. **See "EXHIBIT 23 "**.
3. I reside with Mrs Eliahoo at 31 Riverside Road, London N15 6DA.

Reason for this objection:

4. This objection letter relates to the planning application(s) made concerning the adjoining property, 31a Riverside Road, London N15 6DA. **That should be rejected under section 70 of the Town and Country Planning Act 1990 delegated powers.**
5. The registered proprietor of 31a Riverside Road is Theriverside Limited (company no. 08990258), the sole director being Mr Naftali Gluck ("Mr Gluck"). It is asserted that Mr Gluck is not the registered owner of 31a, the true owner being Theriverside Limited to which Mr Gluck is a director.

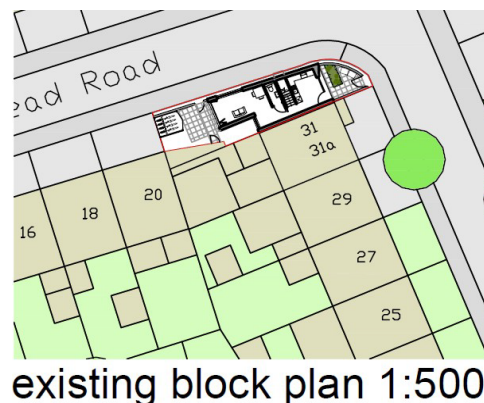
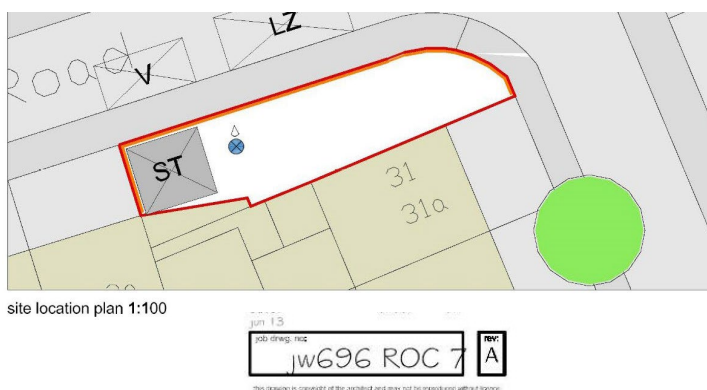
HGY/2023/1199 dated 02 May 2023. The latest application for | 31A Riverside Road London N15 6DA Demolition of existing single storey dwelling and construction of two storey **plus basement** to an end of terrace property, reply by the 19th of July 2023.

6. Regarding the previous approved appeal consent dated (on 21 June 2023) PP/Y5420/W/22/3300942 relating to Planning application HGY/2021/3137 .

2nd bedroom HGY/2023/1199 -v- home office HGY/2021/3137.

7. This proposed application is for an additional basement with a BATH/WC and change of use of an office to a bedroom on the 1st floor.
8. It should be clear that there is a bathroom on the 1st floor and a w.c. on the ground floor, so why would one require a BATH/WC in the proposed basement. This setup and location can be used as an on-suite bathroom for future users and the rest of the open space as a living/separate living accommodation at a later stage, as was previously applied for!
9. The basement application that has failed in the past are HGY/2018/3597, & HGY/2019/0880 & HGY/2021/0849 & HGY/2021/1470 as outlined herein including 2 appeals APP/Y54420/W/20/3255539 regarding application HGY/2019/0880 and APP/Y5420/W/22/3293573 regarding application HGY/2021/1470.
10. We note that the plan that consent was given too was for on the first floor one-bedroom 14m2 and a **home office** at 9m2 (will be outlined in the main objection report 9m2 -v- 12m2). One of the latest conditions, is for 2 bikes storage space in the rear garden. See table and further details below, as to how much garden space is actually remaining.
11. In this latest application HGY/2023/1199 the **home office** at 9m2 has now reverted to a 2nd bedroom with a showing a **single bed/bunkbed** which can also be used for 2 beds. We ascertain that this room is infact 12m2. It was originally applied for as 12m2 bedroom for 2 persons in 2014 and 2015. Therefore, a bike store as agreed is necessary for a 4 bike capacity.

In the Roc 7 agreement for application HGY/2015/3371, approval of details pursuant to condition 3 (cycle parking facilities) attached to planning permission HGY/2015/1638 **Granted permission together with drawing number . jw696 ROC 7 rev A** it was agreed that a designated bike store will be erected in the rear garden taking up 4.3m2 plus space for the door to operate. See attached plan of bike store.

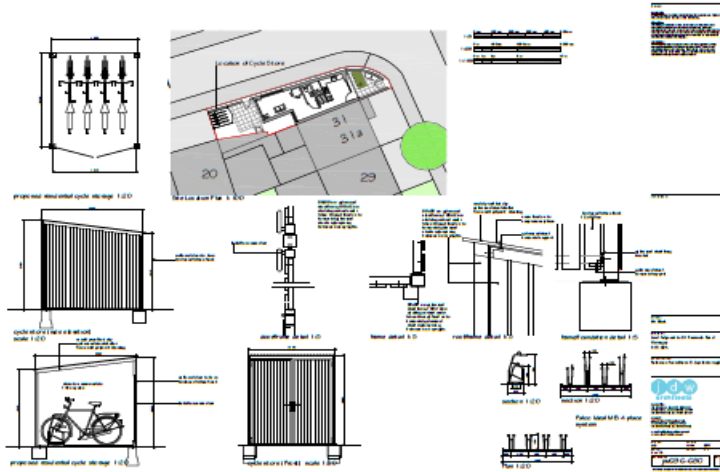


Note the bike store in both site plans.

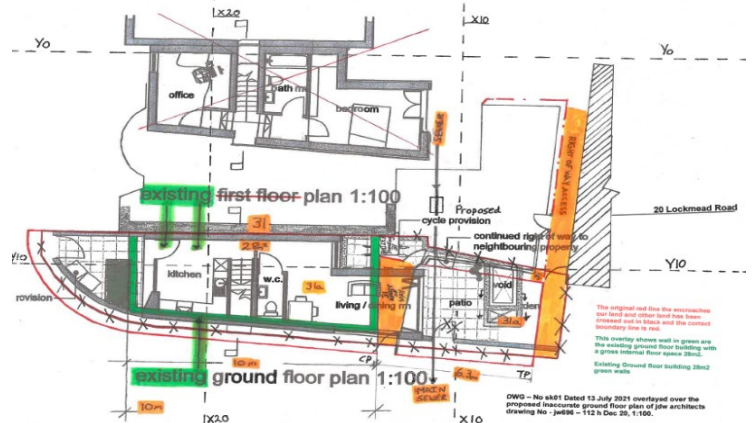
4.3m² re bike store for 4 bikes

Sample from jw696 – 680 – REV: Nov 2015

See Exhibit 2 It is further noted that **jw696 ROC 7 rev A** it appears quite evident from the site plan that here again it has been shrunk to suit the narrative. Note the **ST for 4 bikes** it takes up the complete back garden. See Exhibits 30 & 17 above on the left. It is further noted that the within the **block plan 1:500** the plan is stretched wider and now the bike store is much smaller squeezed into a corner of the garden and not as indicated in the rev A drawing . See Exhibits 7 and the 1:100 plan **jw696-680 exhibit 27**.

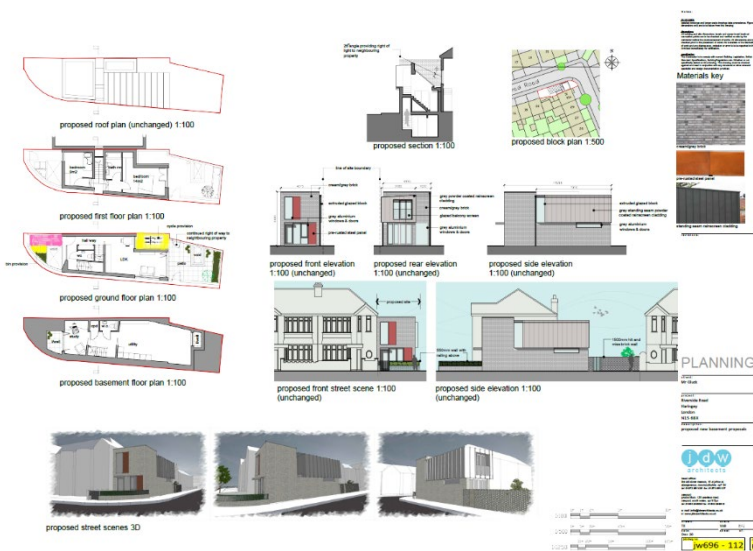


76618. pdf. ROC 7 bike shed drawing EXHIBIT 32



sk01 Dated 13 July 2021. EXHIBIT 1.pdf

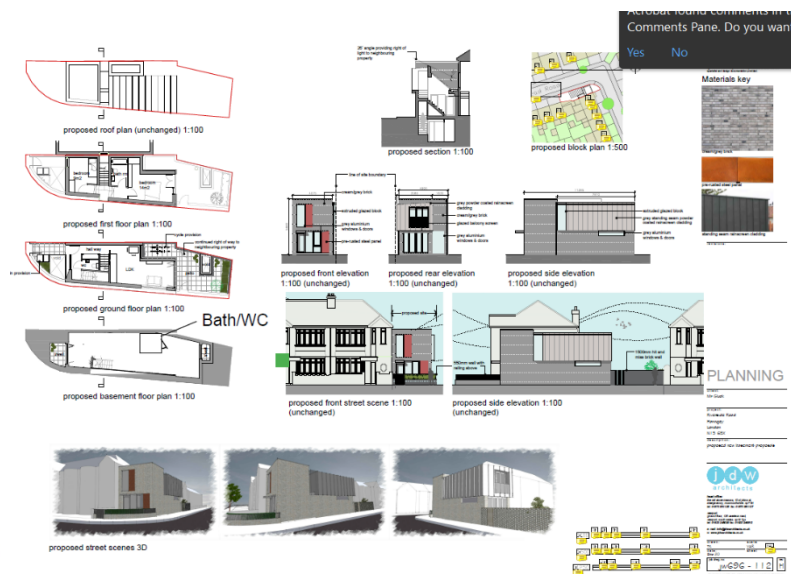
jw696-680 exhibit 27 that is part and parcel of the planning agreement for drawing **jw696-100rev D**



HGY/2021/1470 Plan **jw-696-112 Rev H**

Note in the basement that this application there is a study, cpd, wc and utility area.

The doors to the lightwell are infact windows to the front and the rear L/wells, not full height doors to the front L/well as assumed by the inspector.



HGY/2023/1199 Plan **jw-696-112 Rev H**

Note that on this plan there is a staircase a square box wc and it is clearly noticeable that the walls have been removed to allow more light into the 51m2 elongated basement

Site plans of new application and comparisons with the previous failed applications

The basement application on the left is in accordance with the latest version of plan – 112 H of 2020 edited with all the internal wall removed. The drawing on the right, is the one that is indicated in the March Group (RP 230214 - Riverside Road - Internal Daylight Assessment Report - Rev01) seen on page 3? In both drawings the Footprint and GIA are the same! Is the old layout in the March Group drawing just for reference and not as a fact for layout. It should not be construed at a later date the floor layout is in accordance with the March group drawing.

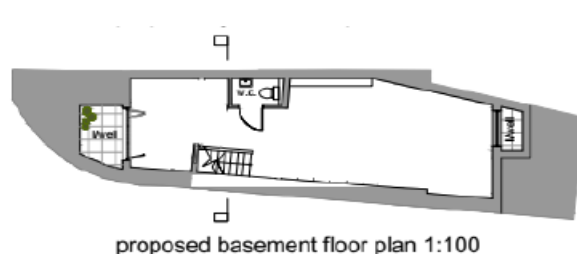
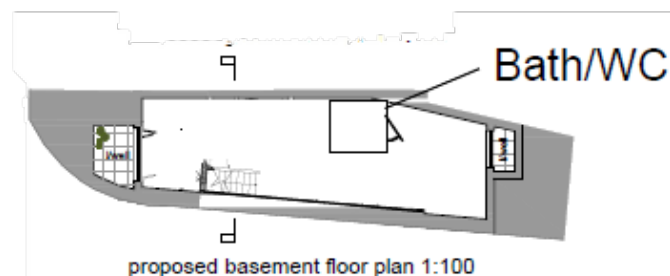


Figure 2.1: Floor Plans of the Proposed Development

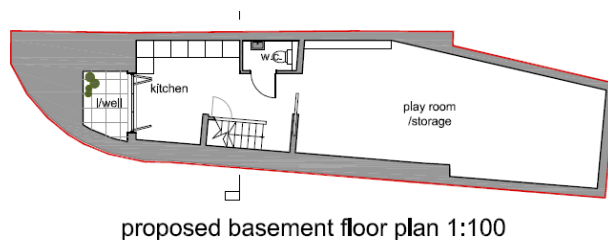
[From planning applications HGY/2023/1199 Drawing jw- 696 – 112 rev H](#)

[From Planning application\(Mach Group\) HGY/2019/0880 drawing jw-696 – 112 rev B](#)

Also NOTE -in the declaration dated 02 May 23 (the Application form for planning permission) under the section residential unit the GIA is declared at 93m² under “Habitual Rooms” x 3 rooms (1= LDK **where are the other 2 rooms habitable rooms**) and x 2 bedrooms (they are situated on the 1st floor) in the 1 unit proposed 3 floor house arranged as basement, ground and first floors. . Where are the 3 habitable rooms there is 1 on the ground floor marked LDK, we can only conclude that **the other 2 habitable rooms must be in the basement.**

Note the change of position of the WC and now Bath WC with a larger area, the latter drawing is our opinion is attempting to establish that there would be enough natural light in the proposed basement, for the new scheme. Which there is clearly not as outlined (in our site drawing depicting the location of the boundaries **sk01 Dated 13 July 2021. EXHIBIT 1.pdf**) in the table and adjacent plan below it is clear that there is not enough garden space to house the unsized rear I/well as indicated and drawn.

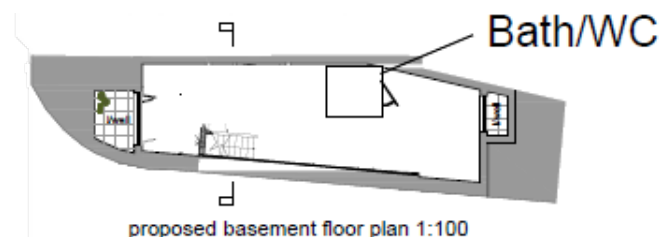
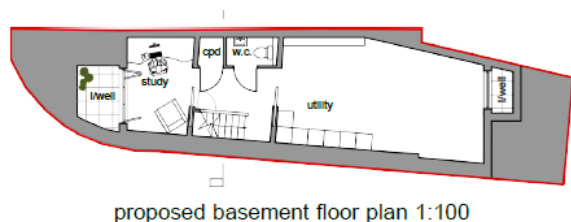
Note the internal layout of previous failed basement applications. Study relocated from 1st floor to basement and kitchen relocated from the ground floor.



[From Planning Application HGY/2019/0489 cancelled and withdrawn 29/03/2020 as explained herein.](#)
[Note this version with the I/well Drawing number jw-696-112 Rev -with full opening patio doors](#)
[Full height. Note since this application there has been no other scheme with a full light well](#)
[December 2020.](#)

[From Planning application HGY/2019/0880 for a full](#)
[basement planning was refused on the 4th of May](#)
[2020 appealed APP/Y54420/ W/ 20/325539 Dismissed on This is](#)
[probably due to the strain on the property as explained in the box below.](#)

HGY/2021/1470 **dated 19 April 2021** | 31A Riverside Road London N15 6DA Demolition of existing single storey dwelling and construction of two storey **plus basement** to an end of terrace property (**previously approved**, ref: HGY/2015/1638) **was refused by notice dated 23 August 2021**. The applicant Mr Gluck appealed the decision **dated 23 August 2021**, APP/Y5420/W/22/3293573, the appeal was dismissed on the 14 September 2022



From Application HGY/2021/1470 Drawing number jw 696- 112 Rev H this plan and layout Was Refused by notice in August 2021 and was also refused on the 14th of September 2022 on appeal APP/Y5420/W/22/3293573. From planning applications HGY/2023/1199 Drawing jw- 696 – 112 rev H

Note

The council contend that the previous permission at the appeal site has lapsed, and the appellant's submissions have not disputed this. As such Inspector Harrison gave limited weight to drawing **JW696-111** which references 'existing approved dwelling' and the fallback position referenced in the submitted Design and Access Statement.

Must **the updated MACH Group information can be found on pages herein.**

Main Issues

Inspector Harrison determined that the main issues are in Paragraph 3:

- whether the living conditions of the future occupiers of the proposed development would be acceptable, with regard to daylight/sunlight and outlook in the basement; and
- the effect of the proposed development on the structural stability of the building, neighbouring buildings, and the highway.

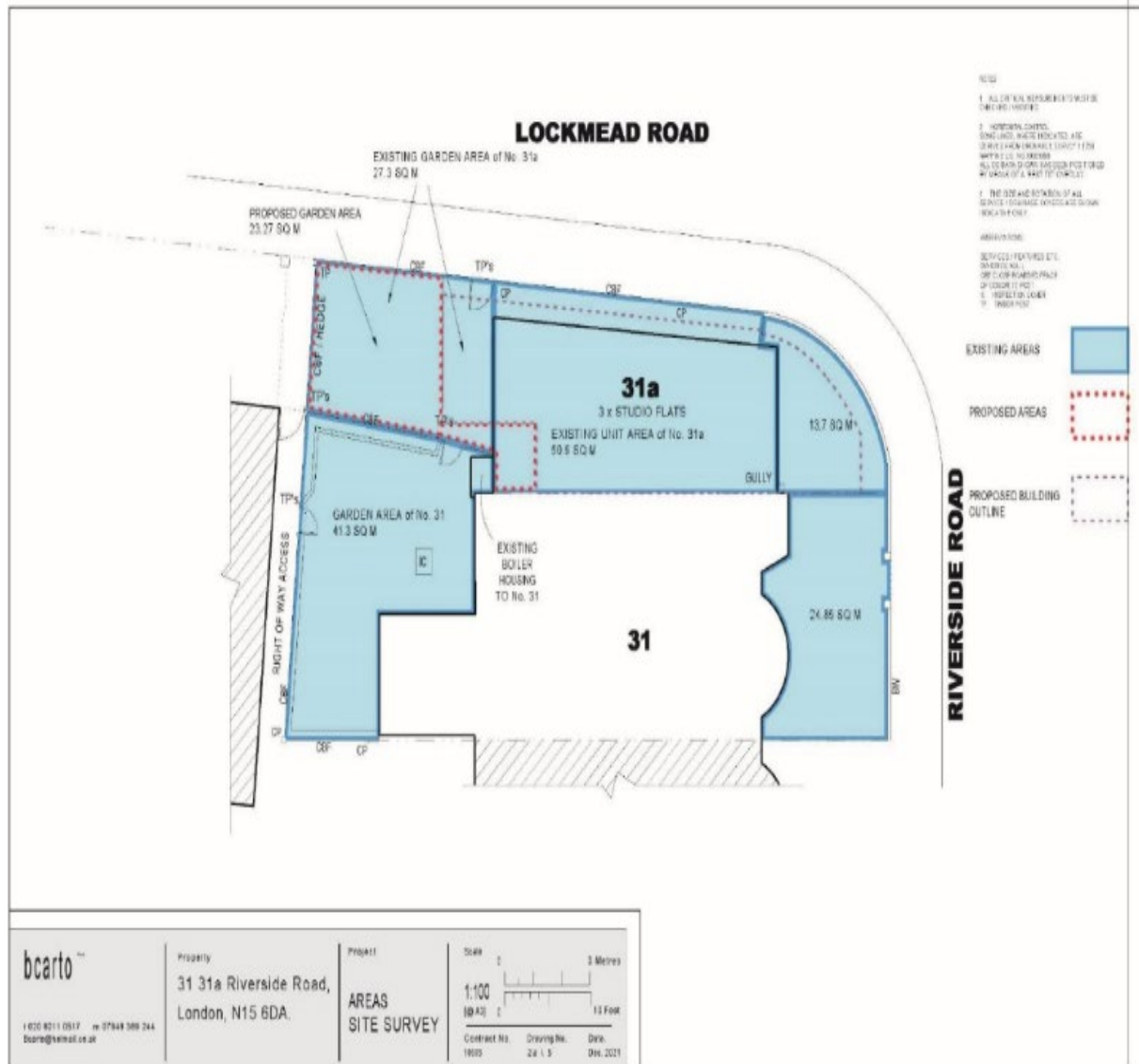
We add to the above issues as will be outlined hereunder.

- The declared size of the **GIA (gross internal area) as (PP-12131063) 93m2 (or 123)** as per the presented facts in the application form dated 02 May 2023 PP-12131063 in paragraph Existing and Proposes Uses 93m2. In the CIL form of Kirsty Sullivan dated 26/01/2021, PP-09455136 (resubmitted), see section 6, Proposed new gross internal area. The existing is declared as 72m2 and the total GIA is 123m2 = for the basement **51m2** (this took in to account the proposed ground and first floors as per drawing jw696 -100 - D)
- The proposed basement has an allocation for only 21m2 as per the declaration in paragraph for. The basement has more GIF space then the upper floors that are declared as 36m2 each = 72m2?
- What is the total GIA for the proposed 3 floors development 93m2 or 123m2. If we say that its 123m2 then the GIA would be 51m2 as outlined in paragraph a above.
 - First floor 36m2 and Ground floor 36m2 and basements 51m2 =123m2 in total. This will determine that the extra 15m2 area declared for the basement. If we deduct the **15m2** of the basement from the declared garden area of 27m2 the **size of the remaining garden would be 12m2** in the garden above less the space of the proposed light well and railings and bike store. Also see 4 in paragraph below.
- The facts have changed in various applications including in **this application** HGY/2023/1199 dated 02 May 2023. In this application the GIA for the 3 floors is declared at **93m2**. After further observation it is apparent that the footprint of the basement level is wider and larger than the ground and first floor extended addition (LDK and 14m2 bedroom above).

The additional rear internal area covers approximately 65% of the declared proposed ground floor garden area. The applicant Mr Gluck declares the rear garden space to be 27m². We have established that space appears to be 23.27m² (our gross area) not 27m² and 15.07m² (our net area) the 15.07m² does not include the area taken up by the proposed light well and railings no size given. See all the relevant additional information hereunder.

[*Explanation of Total Plot Area for P1:100 Plan 2a\ 5 \(2021\):](#)

[*See full information in the Objection report 15-SEP-2022 \(03\)](#)



The rear garden's actual size with the Roc 7 clause C active means that a 4 bike, bike shed needs to be installed taking the proposed rear garden from 23.27m² to a size of 18.97m². However, there is dead space behind the boiler house and the existing wall, of 3.97m² – 3.97m² off of 18.97m² = a total of 15.07m² total space available in the rear garden.

13.7m² (is the proposed front garden) – 45m² (proposed house footprint) – 15.07 (rear garden size after bike shed is put in) = 81.97 (Total useable plot area). To use for house walls, garden walls, l/wells and bike storage!

Table 1: Summary of the Different Scenarios of 31a Property Size

SQM (m ²)	Jw696 – 100 rev B/D (2015 & 2021)	Design & Access Statement Rev B. (2015 & 2021)	1:100 Picture with Area (2021)	1:100 Plan 2a\ 5 (2021)	Google Earth (2021)	Jhon Stebbings (2008) & Jw696 – 100 A (2014)
	Proposed	Proposed	Existing	Proposed	Estimated Existing	Proposed
Front Garden (m ²)	27	27	13.7	13.7	13.3	20
House Footprint (m ²)	45	45	50.9 (With Path)	45	50.6	45
Rear Garden (m ²)	27	27	27.3	23.27 (23.27-4.3m ² re bike shed for 4 bikes) – (3.97m ² dead space) = 15.07	26.9	34
Total Plot Area (m ²)	99	99	91.9	78 (73.77) *Explanation below	90.9	99

1. What is the correct size of the **GIA 90m²**? (CIL HGY/2019/0880) **or 93m²? 99m² or 123?**
2. The existing single story building GIA is declared as 28m² for 3 studios.
3. what is the correct size of the rear garden **27m² or 15.07m²** minus lightwell area?
4. A designated bike store agreed to in the garden is 4.3m² included the 15.07m² = what **size of remaining garden when the lightwell area is removed no dimensions declared for the l/well.**
5. What is the area size for the lightwell plus safety railings? More loss to garden space!
6. what is the correct size of the proposed ground and first floor if the GIA is 72m² divided by approximately 2, **36m² per floor** the declared **house footprint is 45m²**, therefore the external wall must add up to according to this calculation **9m² per floor =18m²**? This would match a footprint 45m² x 2 floors = 90m² including external walls. **Not a GIA of 93m² or 99m²!**
7. The declared size for the site is 99m².
8. what is the correct size of the site 99m² or 81.97m² as outlined in the table above?

Proposed site area as outlined in the application as 99m²:

- a. Total site area – House footprint – declared Rear Garden = Front Garden.

99m² (site area) - **45m²** (proposed house footprint which **=45% of the site area** as declared in the jdwr report) therefore the rear garden and the front garden area is **54m²** (=99m²) - **27m²** (as declared rear garden is) = **remaining 27m²** (for the front garden).

Our claim is that the front garden is not 27m², its impossible as outlined above.

- b. Considering that the 9m² home office (re requirements for the bike store) (Jw696 – 100 rev D) is actually 12m² + (LIST OF RECOMMENDATIONS UNDER DELEGATED POWERS 15/02/2015; 6.5 Quality of accommodation) that can be converted to a 2-person bedroom, with nothing stopping this happening at a later date! This exact point has been brought up before which is why the Roc 7 clause 3 was introduced (DWG – Jw696 – 680) stating **that a 4-person bike store must be added** (the plan allows only for 2 bikes omitting a store).
- c. If we take the approximate area that is required for the bike store, it is 4.3m² (off the actual size of the garden being **23.27m²**) leaving a rather small remaining garden of 18.97m². Of which a further section of the garden is inaccessible, due to the facts presented by the proposal (see pictures of boiler house and space below), the proposed rear extension return wall adjacent to the existing boundary fence (of 31)

has a unaccusable gap of approximately 150mm between the boundary fence of No.31 and 31a proposed extension. Therefore, there is no access to the remaining area (alcove to the window) which is approximately 3.97m^2 . **This inaccessible area will now further reduce the proposed rear garden area to approximately 15m^2 , which is way too small for 4 – 5 persons and the size of this two-storey house plus basement proposal.**

- d. Total site area – House footprint – ‘Proposed’ 2021 Rear Garden = Front Garden

$$99\text{m}^2 - 45\text{m}^2 - 23.3\text{m}^2 \text{ rear garden} = 30.7\text{m}^2 \text{ front garden. } \text{Not possible!}$$

- e. How can 31’s existing 24.85m^2 front garden be smaller than 31a’s hypothetical 30.73m^2 front garden? It is evident that 31a’s front garden is smaller than the 31s by simply inspecting either the Google Maps pictures or the plan above. This was the original argument with plan A in 2014. Which was refuted to in the decision as, bulk, elongated Plan in an attempt to declare that the plot is 99m^2 , **it is clearly misleading!**

Existing declared 28m^2 g/f 2 bed flat including side path = 50.9m^2 : See exhibit 2 & 2a\5 10585

1. House with side path $\div$ total site area $\times 100$ = house cover percentage.

$$50.9\text{m}^2 \text{ flat \& Parth} \div 91.9\text{m}^2 \text{ site area} \times 100 = \text{a } 55.4\% \text{ house coverage.}$$

2. In the last proposal (HGY/2021/3137) the claim was made that “The proposed house covers 45% of the overall site” (document reference No. 714381- **12064 rev ‘B’ Exhibit 35. pdf**). It is evident that this is erroneous information as the proposed house covers 55.4% of the overall site. Additionally, the claim that the footprint is 45% while the balance of the front and rear garden also equals 45%, **this should have rung alarm bells long ago!**

3. When the measured meterage of the exiting confirmed meterage and the site supper imposed supplied and the position where we know the boundary is according to drawing number 1:100 2a\ 5 (2021) as above herein, and see Exhibit 2

4. Total property area – House with side path – back garden = front garden.

$$91.9\text{m}^2 - 50.9\text{m}^2 - 27.3\text{m}^2 = 13.7\text{m}^2 \text{ (size of existing front garden)}$$

5. The overall height of the proposed dwelling to the ridge is to be around 5.6 meters.
6. We know from plans Rev - B & D (submitted in 2015) and the plan Rev - D (again submitted in application HG/2021/3137 in 2021 and now approved on appeal subject to conditions) that the rear garden is declared as 27m^2 . Taking this information with the proposed footprint of the house ($45\% \times 99\text{m}^2 = 45\text{m}^2$) would mean that the front garden must also be approximately 27m^2 ($99\text{m}^2 - 27\text{m}^2 - 45 = 27\text{m}^2$ front garden?).
7. From the onset, the original documents information as outlined above is the same (it can be found in document number **669244.pdf of HG/2014/3574 on page 10 see, EXHIBIT 49** of the same name) information in the **document prepared by JDW Architects** over the duration of the period of all the applications made over seven years

since December of 2014. However, when the updated plan Rev B was submitted on the 12th of February 2015 submitted with an amended size for the rear garden **being 27m²**

8. **27m²** is noted on all the subsequent plans submitted since 2015. This is an obvious deception that has been proven beyond a shadow of a doubt. We have argued these points from the get-go. The applicant and his agents have constantly provided erroneous information, (in the application HGY/2023/1199 there are no measurements given for the ground floor and basement) and in doing so, have repeatedly acted in this manner, as has been demonstrated above. **See Exhibit 49**
9. **We require that the LPA implement Section 70 of the Town and Country Planning Act 1990 delegated powers.**
10. The LPA must conclude with the appropriate action and prosecute for the unlawful and deceitful misinformation as has been outlined in the past. This matter is more than just encroachment/trespass of neighbouring land. As the unfounded information is laid out as per the owner submissions and constant inaccurate signed declarations in this section as per the sites of 31 & 31a as well as the ownership of part of the land.

Application for Planning Permission 1590463.pdf (EXHIBIT 44) dated 28th & 30th September 2021

1. In the **Application for Planning Permission declared area for g/f & f/f**, it is declared. In Para 4, it is claimed that the site area is **99m²** this was the same declaration as plan jw696 – A dated June 13, 2014, In paragraph 13. The existing and proposed use, the GIA (gross internal floor area in square meters) is also declared as **93m²** for the proposed 3 floors (**for & f/f, g/f**). **This application was without a basement!**
2. This would equate to approximate GIA **45m²** on the ground floor and GIA **48m²** on the first floor (considering the 2.373m overhang for the external wall of the 1st floor) would be the footprint area. Considering that the first floor declared living space is **23m²** the bedroom is **1 x 9m²** [in fact 12m²] and **1 x 14m²** for the main bedroom. Then the bathroom plus 2 landings and allocated space for the stairwell most definitely do not equate to the balance **25m² = 48m², for the GIA is not possible considering the small amount of space taken up by the residual area?**
3. Then on the ground the kitchen we have the dining area which is below the master bedroom it **is now declared as 28m²** the area is not much larger than the bedroom above which is **ONLY 14m²** some **14m² larger** (are they possibly including in this calculation the passageway and kitchen area in the **28m²?**) than the room above bedroom 1. The plan does not warrant this FACT as it simply does not fit the calculation!
4. We know that the kitchen area on its own is less than the size of the declared size of the bedroom above which is **9m²** [in fact 12m²] of habitual living space, and a kitchen is not considered as habitable living space? Here again, we do not equate that the stairwell on the g/f and w/c space will account for the balance of the GIA **45m²?** If we say that the dining room is in fact as stated **28m²** and the kitchen area is **9m²** totalling **37m²** that would leave **8m² remaining** for the approximate **4m²** passageway, the **2m²** w/c

3.5m2 stairwell there is also still a shortfall of space of approximately **5m2** if one compares the space to the above bedroom space on the 1st floor area. There is a total extra ground floor unaccounted meterage of at least **6m2?** According to the measurements provided on the plans for the **G/F** and approximately **22m2** for the **F/F!** However, both floors do not add up, they are of different sizes. They don't both add up to either **45m2 or 48m2,?**

The CIL declaration for the GIA is 72m2 = approx. GIA g/f = 33m2 and ff 39m2

5. **In the CIL document** it is declared that the GIA for the g & f/f is 72m2 and together with the basement it is **123m2**. Thus, the size of the basement is accordingly **51m2 +/-**.
6. Re **Para 12** comments on Existing use, the existing single-story (registered at the council tax department) as a **2-bedroom** individual dwelling and has been used up until recently as 3 self-contained studio flats. In September 2022, the back studio had a male occupier/tenant. Even though the 3 unauthorized studios were to be reverted to a single dwelling with a single tenancy agreement. Here we can see further evidence of the modus operandi and actions taken by the owner and why he cannot be trusted, for the future use of the premises, now and down the line.

From doc REV B Note 7.7 and 4.5 from waste management of new and old applications HGY/2015/1686 & HGY/2021/3137 and HGY/2021/1470

- **The area of the front garden remains a question after the l/well, raised planter and bins are placed and how many meters the final space will be for the bin enclosure?**

7.7/ waste management

"The dwelling will be provided with separate refuse and recycling storage facilities; typically, 240-litre wheelie bins for general household waste, green waste and compost, and green bags for dry recyclables (recyclable glass, tins and plastic goods, paper, and cardboard). 3No 10 litre dedicated labelled recycling bins will be provided in kitchen to allow the successful separation and storage of waste prior to collection, including a kitchen food waste 3No 10 litre dedicated labelled recycling bins will be provided in kitchen to allow the successful separation and storage of waste prior to collection, including a kitchen food waste caddy."

- **After the consent was granted in 2015 the requirement for the bins were**

"1 x 140L wheelie bin for refuse, 1 x 140L wheelie bin for recycling, 1 x 25L food waste kitchen caddy, 1 x 25L food waste exterior box. Where in the front garden will the recycling storage facility be located?"

4.5/ proposed landscaping

"At the front of the property, it is proposed to provide a dedicated bin enclosure, so that they are not left visible from the path. This enclosure is to be located adjacent to the front access point for ease of bin collection. The bin enclosure is to be designed to

provide sufficient waste storage to suit local authority provision requirements for both general waste and recycling, typically 1No Wheelie bin, 1No additional bin for dry recycling/ or recycling boxes in line with the current scheme in place. Wheelie bin provision is for 240- litre bins in all cases.

However, the application drawing jw696 - 112 rev H, does not indicate a dedicated bin enclosure in either drawing Rev D or Rev H! Why is there no bin enclosure!

The proposed lightwell (and the railings that surround the l/well) in the front garden is taking up a large section of the garden leaving very little space for housing the proposed bins in the remaining designated area.

6.4/ Impact on the amenity of adjoining occupiers.

All development proposals are expected to maintain and respect the living conditions currently enjoyed by occupants of adjacent residential properties as set out within saved UDP Policy UD3 and concurrent London Plan Policy 7.6.

Proof that the second bedroom (in the previous planning consent drawing jw696 – 100 rev D it was a 9m2 home office) is in fact 12m2 +,

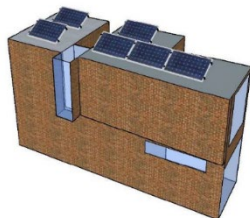
- a. The length of the side elevation is 11.295m long.
- b. The length of the protruding side elevation is - 7.910m long -this from the above.
= bedroom side wall is 3.885m+ long.
- c. Therefore, the side elevation of the front bedroom is 3.885m x long.
- d. The front is declared on drawing -100 Rev D as 4.075m x wide add both measurements together give a total GIA of **=15.831m2** for the bedroom.
- e. – the bricks area for the front wall $4.075 \times .3 \text{ thick} = 1.22\text{m}^2$
- f. – the bricks area for the side wall $3.885 \times .3 \text{ thick} = 1.17\text{m}^2$
- g. Therefore, the total of the external walls is **=2.34m2 of area.**
- h. We must now deduct the GIA of the room from the area used by the walls. **15.831m2** – 2.34m2 = 13.491m2 less the space taken up by the landing and step approx. -1m2 = **12.491m2** this is the minimum size of the area of the room taken from all the declared measurements in past applications.
- i. The **12.491m2** is an approximate measurement as we note from the drawing that the flank wall facing Lockmead road gets wider from the front to the back of the building.
- j. **We must conclude that the proposed 2nd bedroom is NOT 9m2** as outlined in the drawing (jw696 – 112 Ver H supplied with this application HGY/2023/1199) it must be as outlined above **more than 12m2.** +

Conclusion that the 2nd bedroom is **12.491m2 plus for the extra space as the room widens.** Therefore, this room most definitely can be used as a 2-person bedroom and not as indicated with a single bed.

k. solar

4. Be Green

Further opportunities to reduce CO2 emissions on the dwelling will be achieved by installing a 1.8Kw solar PV system, comprising 6 panels on the flat roof. The panels will be facing south.



- l. The energy statement in paragraph 4 declares we quote; *“Further opportunities to reduce CO2 emissions on the dwelling will be achieved by installing a 1.8Kw solar PV system, comprising 6 panels on the flat roof. The panels will be facing south.”* This is again contrary to the Application form dated 02/05/2023 where it categorically declares in the Environmental section that **Solar Energy NO**. Passive energy is declared as 0, so they won’t be installing air conditioning.

- m. Will there be a solar system? As the CIL document indicates **NO SOLAR?**

- n. Will there be air conditioning? As the CIL document indicates **NO air conditioning.**

SWAPPING AND CHANGING SPACES IN THE BASEMENT AREA

Regarding swapping and changing spaces in the basement area from 2018 – 2023. All the basement applications have failed and on 2 appeals, the applicant once again by using cliché words to spin his narrative of names of spaces and utilization of space this has been tried and failed in the past. By saying that the basement will be used as a utility room etc. instead of a kitchen as intended. However, when it was outlined by us and explained what a utility room can be turned into a kitchen later down the line or for future occupiers, **then this application should reverts** to the previous failed refused application, as will be demonstrated, in an abridged version.

1. **What is a utility room used for?** It is the descendant of the scullery. Typically, a utility room will include a **washing machine, tumble dryer, large sink, dishwashers, storage, or household crockery, and even a Passover kitchen** a place to store clothes dryers, **the ironing board and iron**, plus extra storage for any other useful wanted household items, **and even additional larger space.**
2. A utility room is an area within the home created for the primary purpose of **housing larger household appliances and performing day-to-day tasks** such as secondary storage space for a kitchen,
3. The purpose for these further observations is proving another point of trying to recreate a space that has been either refused prior or has been given permission subject to classes. As in the 2015 application Roc 7 clause 3, the 4-bike shed as detailed outlined in paragraph ...herein above. **However, the scheme would fail to provide acceptable living conditions for future occupiers. As clearly outlined in the final conclusion of this objection there is simply not enough living space in the proposal.**

Previous applications

HGY/2021/3137 | 31A Riverside Road London N15 6DA Development of a modern two storey 1 bed end-stop to terrace property on the side plot of No.31 Riverside road. Was appealed reference APP/Y5420/W/22/3300942 and was approved and granted permission on appeal on the 21 June 2023, subject to conditions. **We note a significant observation.**

We note that the ownership matter is disputed. Any development constructed under an approved planning permission would only be lawful if constructed in full accordance with the approved plans, and this would not grant any rights to access or build on third party land.

HGY/2021/3137 | 31A Riverside Road London N15 6DA Development of a modern two storey 1 bed end-stop to terrace property on the side plot of No.31 Riverside road. **Refused.**

HGY/2021/1470 dated 19 April 2021 | 31A Riverside Road London N15 6DA Demolition of existing single storey dwelling and construction of two storey **plus basement** to an end of terrace property (previously approved, ref: HGY/2015/1638) **was refused by notice dated 23 August 2021.**

The latest relevant appeal decision at the site was issued on 14 September 2022¹, for a 2-storey dwelling with a basement, which was dismissed. The main issues relating to this appeal were

- i) the living conditions of future occupiers of the proposed development; and
- ii) the effects on structural stability relating to the basement.

HGY/2021/0489 | 31A Riverside Road London N15 6DA **Addition of basement** to previously approved end of terrace dwelling (previously approved, ref: HGY/2015/1638) Not Determined this was **withdrawn dated 29 May 2021. See Exhibit 16**

HGY/2019/0880 | 31A Riverside Road London N15 6DA Erection of new end of terrace house (previously approved, ref: HGY/2015/1638) **with addition of a new basement level.** **Refused**

HGY/2018/3597 (In the past I was told that this the application number does not exist **see Exhibit 33** that was attached to an email that proves there was such a file opened for public opinion. I Quote; - *This reference does not exist and has nothing to do with applicant nor this site.*) 31A Riverside Road London N15 6DA Erection of new end of terrace house (previously approved, ref: HGY/2015/1638) **with addition of a new basement level. Not Determined.** This application was supposed to be responded by 28/01/2019. We responded to the application It dragged out without any explanation or further correspondence and **was re submitted HGY/2019/0880.**

See attached letter from the “Planning Services by Emma Williamson Assistant Director Planning Services”, signed off by “Dean Hermitage Head of Development Management and Planning Enforcement, Planning Services”. The interesting part of this is that this is a Proposal for a Basement to an end stop house. **The reference number is referenced as HGY/2018/3597 dated 04/01/2019.**

Also see memorandum from waste management dated **The reference number is referenced as HGY/2018/3597 dated 14/01/2019.** Outlining the amount space required for the bins. We believe that there is not enough space for the bins in the front garden considering the l/well, railings and bin store as previously stipulated.

Proposal: Basement addition to End Stop House (previously approved, ref: HGY/2015/1638)

This proposed application will require adequate provision for refuse and recycling off street. I would like to confirm that space must be provided for this property. The information indicated above and below provides some detail about accessibility, design and space requirements.

1 x 140L Wheelie bin for refuse
1 x 140L Wheelie bin for recycling
1 x food waste kitchen caddy
1 x 25L food waste exterior box

HGY/2017/3022 | Land adjacent to 31 Riverside Road London N15 6DA London

Removal of Condition 6 ('The dwelling hereby approved shall achieve Level 4 of the Code for Sustainable Homes') attached to planning permission HGY/2015/1638 **Grant permission.**

HGY/2016/3181 | Land adjacent to 31 Riverside Road London N15 6DA London Discharge of condition 7 (**Construction Method Statement**) of planning permission HGY/2015/1638 for development of a modern two storey 1 bed end-stop to terrace property on the side plot of No.31 Riverside Road. **Grant permission.**

HGY/2015/3372 | Land adjacent to 31 Riverside Road London N15 6DA Approval of details pursuant to **condition 4 (materials)** attached to planning permission HGY/2015/1638 **Grant permission.**

HGY/2015/3371 | Land adjacent to 31 Riverside Road London N15 6DA Approval of details pursuant to **condition 3 (cycle parking facilities)** attached to planning permission HGY/2015/1638 **Grant permission.**

HGY/2015/1638 | Land adjacent to 31 Riverside Road London N15 6DA London Development of a modern two storey 1 bed end-stop to terrace property on the side plot of No.31 Riverside Road **Grant permission. We did not receive the planning letter, that's why we did not object.**

HGY/2014/3574 | Land adjacent to 31 Riverside Road London N15 6DA Development of a modern two storey 2 bed end-stop to terrace property on the side plot of No.31 Riverside Road **Refused**

Comparison of previous and new Mach Reports dated 14-02-23.

Internal Daylight Assessment **MACH Acoustics Ltd**

Revision	Description	Author	Checked by	Issued by	Issue Date
00	First Issue	Hallam Chapman	Zeinab Elamin	Zeinab Elamin	22/02/2022
01	Second Issue	Gareth Davies	Josh Childs	Josh Childs	14/02/2023

This is the claim of the opening statement on page 1 of the assessment.

*MACH has carried out a **detailed assessment of the internal daylight levels at the proposed Riverside Road development in London.** “The following bullet points provide a summary of the analysis carried out:” **Our response** - infact this study is **only for the basement and not the rest of the development.** In the end of the next paragraph, it becomes clear “It is understood that information is required regarding the daylight levels within the proposed basement level”. **Note 1***

Our response - The next paragraph refers to the missing 2 rooms that we have discussed in or various reports, they are referred to here as **bedroom or study.** We have been complaining that the intention of the basement is **for the uses as previous applied for and failed.** Now the intention **is clear for a bedroom etc.**

We quote - “An assessment of the basement spaces has yielded two room dimensions that will achieve Average Daylight Factors **equal to or above 1%, which is suitable for bedroom or study use.**”

In the 1st report the study was carried out at 2% and in the new assessment it is 1.5%

We quote – “Overall, it is considered that the proposed development’s basement **will be able to include two separate spaces that both achieve the targeted daylight levels.** These rooms can be used as studies or bedrooms based on BRE guidance targets, **and the rest of the floor can be used for non-daylight critical spaces such as a storage area, TV room, gym, bathroom, utility, etc.**”

Note 3 Page 2

1.0 INTRODUCTION

We quote – “This report outlines an internal daylight assessment for the proposed development at Riverside Road London.”

We quote – “This report provides an assessment of the quality of internal daylight levels within **the basement study room.**” **Our response** – note there is a proposed basement study room as per previous planning application, however it is not indicated in the architectural drawing jw696 -112 Ver H. in

We quote – “This document details the methodology and results of the daylight assessment carried on the space mentioned above. The assessment has been carried out using Sketchup 3D modelling software and IES. The report details the modelling carried out to determine the level of daylight received in the assessed room.” **Our response** – would this be for the study? Or the open plan proposal

We quote – “Note: The assessment has been carried out as per the architectural drawings provided by PDA Planning & Development Associates.”

Our response – We have always objected to the accuracy of the drawings; we continue to do so as the drawing as will be proven are not accurate. If the architectural drawing is not accurate then for sure the light assessment can't be accurate and must also be rejected.

2.0 ASSESSED DEVELOPMENT page 3

We quote – The figure to the opposite represents the floor plans of the proposed development. **The 1.1 plan**



historic side elevation 1:100

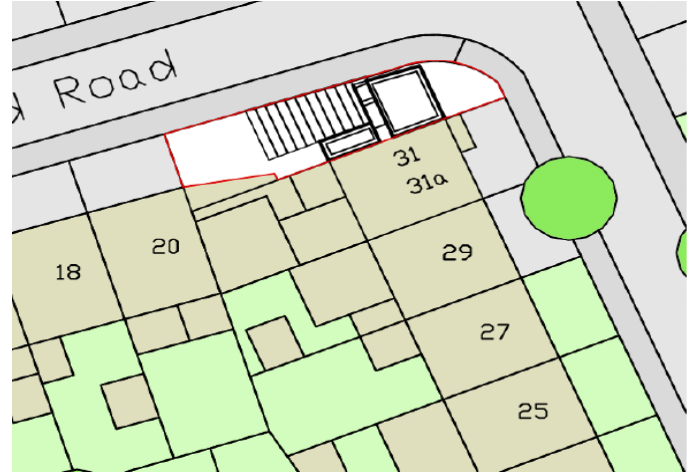


Figure 1.1: Site Plan of the Proposed Site

- i. Note the position of the end of the existing rear flank wall of the 28m2, 3 studios in a single (in the historic side elevation 1:100 plan) story building, which is referred to as a Garage.
- ii. Note that the slopped rear extension roof of No. 31, and the flank wall of the studio flats, the flank wall is drawn as being approximately centre of the slopped roof. **(This roof/wall is another inconsistency, Fact)**
- iii. When in fact the flank wall of the single storey flats is more in line with the end of the illustrated gate and then the gate will infact take up space in the fence. **(The gate is in the wrong position Fact)**
- iv. Note there is a gate for the right of way in the (historic side elevation 1:100) but in the plan Figure 1.1: site plan there is no right of way as the red boundary demarcation is alongside the gable end wall of 20 Lockmead Road. **(31a has no access or right of way to this back path, Fact)**



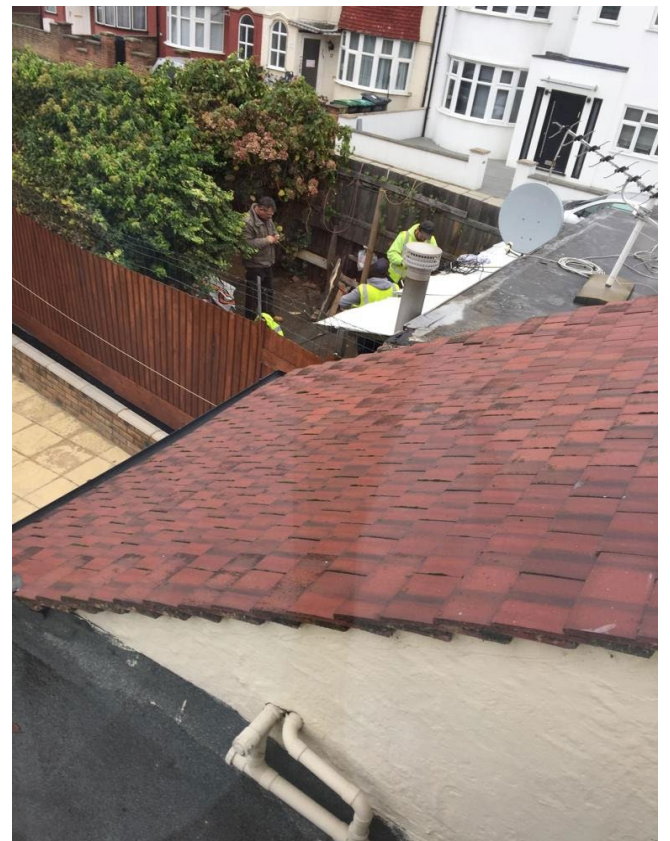
- v. Note the position of existing roof lines, boiler house and boundary fence. **(in Dwg jw696 -112 Ver H it is not outlined like the above)**
- vi. Note the Japanese Knot weed overgrowth neglect pushing down fence.
- vii. Note the correct Existing roof line positions not as shown in drawing jw696 – 110 of the historic side elevation 1:100. Also note the inspection chamber sewers run towards Lockmead Rd through No. 31a's garden.



- viii. The above pictures were taken for the July 2023 report.
- ix. The 2 pictures below are old pictures from 2018 of the concrete over the drain run to Lockmead Road
- x. Workers installing the so-called foundation in 2018 main above the sewers (picture 1).
- xi. Note the inspection chamber cover in the lower left of picture 2 and the concrete above the sewer pipes (picture 2). This is the same sewer runoff from No. 31.



Picture 2

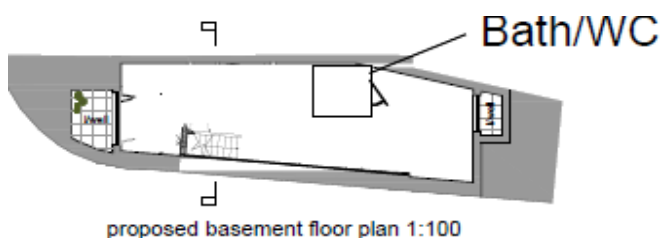


Picture 1

- a. The rear red boundary is over and on a private right of way as door indicated (in the historic side elevation 1:100 plan) (the rear passageway door) this equates to a smaller garden area. (Not as indicated in the plan jw696 – 112 Ver H, **Fact**)
- b. There is supposed to be space for a purpose built 4-bike store situated against the boundary.

We argue that due to inaccurate information of the drawings that were supplied to MACH Groupe and used in their Assessment Report (MACH relies upon the plans accuracy). The results are flawed we outline and attempt to prove that the natural light levels in the basement are lower than the findings of the Assessment report, as will be outlined below.

- c. The lack of information re the height and style of the front garden wall
- d. The loss of light caused by the wall, raised planter and bins.
- e. The loss of light caused by the upstand of the l/wells approx. 100mm higher than the footpath.
- f. The loss of light caused by the proposed ground floor structure including internal finished ceiling of the basement and further drop for the window frame is approx. -450mm + (off the angle of light) lower than the external l/well surrounds (there is again no dimensions for the l/well).
- g. The loss of light will be obscured by the railings, garden walls, the raised planter, and bins, here again there are no diminution given of the actual space required for the above. (We claim our assessment proves that the front garden is only 13.7m²)
- h. The rear garden the loss of light for the internal of the basement is much worse. Cased by the 2m high boundary walls, the bike store, the proposed shrubs that block light to the narrow l/well. And the -450mm + drop (off the angle of light) as outlined in paragraph 'g' above.
- i. The depth of the l/well after taking in to account standard room height finish of 2.4m, we know that - .80 has been the benchmark taken from the floor to the windows that would make the light well depth be approximately 2150mm to the top of the upstand of the entrance pathway. (**Being an approx. visual window height of 1.5m high**)
- j. As there are no dimensions for the width and depth of the l/well how was the simulated light test carried out? Is this guesswork?
- k. It is clear from the model (4.1 3D) that are supplied on page 6 of the report that from the size of the light well there is not enough remaining space for the planter and bins.



Jw696 -112 ver H Dec 2020. Note all the internal walls have been removed and the Bath/wc has been removed to the 'proposed back basement bedroom!'

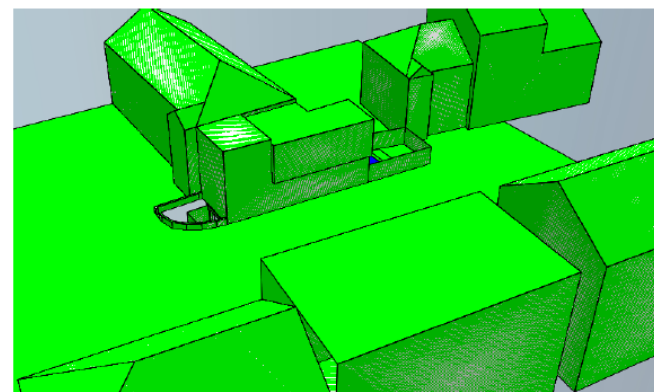


Figure 4.1: 3D View-1 of the daylight model of the Proposed Development

3.0

3.1 BRE – Site Layout Planning for Sunlight and Daylight: A Guide to Good Practice (2011)

We quote – “The BRE document states that the daylight criteria should only apply to living and occupied areas within the development, which includes kitchens, living rooms and bedrooms. As such, an assessment for the proposed development will be carried out for the Living Area/Kitchen and Bedroom.”

Our response – This is a repeat of the last few planning applications and appeal thereafter, they were both declined as the scheme was found to be unsuitable. The basement use “will be carried out for the Living Area/Kitchen and Bedroom”. (Possibly a basement self-contained flat)

We quote – “Therefore, it is considered as a more detailed and representative measure of the daylight levels within a living area. In housing, BS 8206-2 recommends minimum values of ADF of 2% for kitchens, 1.5% for living rooms and 1% for bedrooms”.

Our response – see the tables in section 5 of the MACH Group that the ADF failed in the basement to achieve the required benchmark and they fall below this requirement.

We quote – Benchmark is between 1.5 – 2.0 % for “Typical value of ADF for living rooms/kitchens.
Where this value is not achieved across the whole floor area, FF&E and room layout should position seating/lounge areas in daylight areas above 1.5 – 2.0% ADF.”

Our response – see the tables in section 5 of the MACH Group that the ADF failed in the basement to achieve the required benchmark and they fall below this requirement .

We quote – Applying BRE Guidance to the Proposed Development

We quote – “The use of internal space in the development should be considered, as BRE provides daylight parameters for living rooms and kitchens separately. However, it does not provide guidance on dual-use spaces as seen in the proposed development. As the floor area of living spaces is larger than kitchen areas, it is recommended that a daylight factor above 1.5% is seen as acceptable. For the assessment ADF target of 1.5% for lounge/kitchen space has been used.”

4.0 ASSESSMENT MEASURES

4.1 Daylight Model

We quote – “Note: The assessment has been carried out as per the architectural drawings provided by PDA Planning & Development Associates.”

4.2 Model Inputs

We quote – Wall thickness is assumed to be 0.30m thick.

We quote – *As per BRE guidance, a working plane has been set at 0.80 (for) the proposed study room above the finished floor level.* Our response - this is 101% proof that the basement is intended for living room space i.e study room, living area / kitchen and bedroom, and the rest of the floor can be used for non-daylight critical spaces such as a storage area, TV room, gym, bathroom, utility, etc. Declared as a reapplication after numerous dismissals and failed declined applications. The applicant and his agent is attempting window dressing the application plan and omitting all the intentional facts that are contained in this MACH assessment for now and in the future intentional use!

We quote – “The proposed double glazing has an assumed diffuse visible transmittance of 0.70.”+

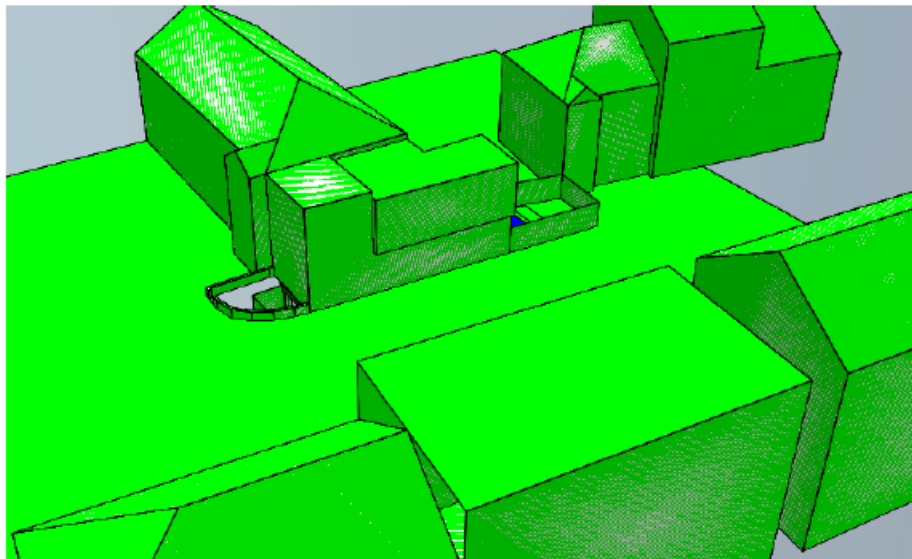


Figure 4.1: 3D View-1 of the daylight model of the Proposed Development

Our response to Figure 4.1: 3D view 1

- From the model it is apparent that the l/well is huge compared to the section drawing supplied. Jw696 – 112 Rev H
- The front garden wall is extremely low.
- There does not appear to be enough space left for the planter and bins.

5.0 ASSESSMENT RESULTS page 7

We quote – “MACH has assessed the daylight levels for the proposed development’s basement, based on the provided floor plans. Through an iterative process, MACH have established the maximum room depths that allow for an Average Daylight Factor (ADF) of more than 1%, so to be suitable for a bedroom or study.”

Floor	Room	Target ADF (%)	Predicted ADF Results (%)
Basement	N/A 1	1.0%	0.64

Table 5.1: Basement Floor ADF – No Room Separation

- a. Our response - This N/A 1 (not applicable 1, is the open plan basement) example below is only a hypothetical simulation and, in our opinion, based on inaccurate information from the plans. The area clearly fails the test at 0.64% this is well below the required for basements 1.5 and even 2.0%. we quote - *and the rest of the floor can be used for non-daylight critical spaces such as a storage area, TV room, gym, bathroom, utility, etc.*
- b. Our response - The MACH Assessment simulation is based on the basement being used as living space with habitable rooms such as we quote – “*As the floor area of living spaces is larger than kitchen areas, it is recommended that a daylight factor above 1.5% is seen as acceptable*”.
- c. Our response - It is clear that the purpose of the basement will be for living accommodation kitchen and bedroom etc.

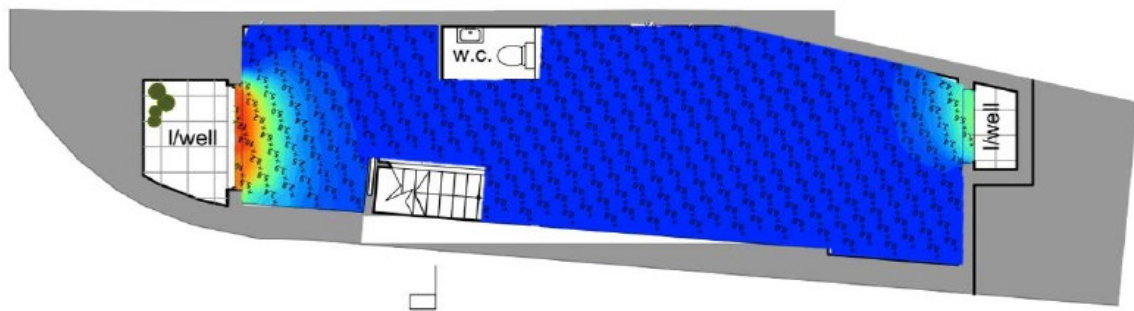
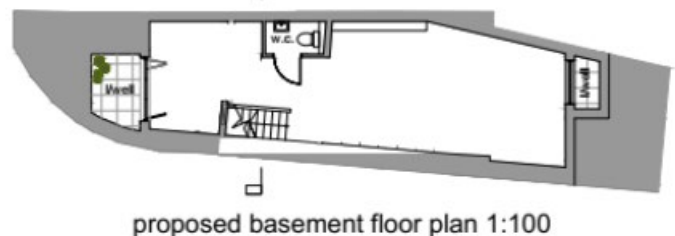
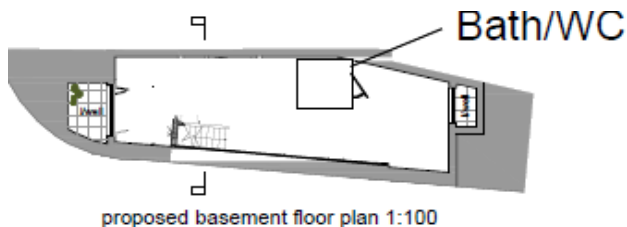


Figure 5.1: Basement Floor Daylight Factor Plot



Jw696 -112 Ver H is the drawing supplied for planning as an open plan basement, in reality we find that the MACH assessment. is based upon 2 living rooms in the basement a study and bedroom. and the space in the middle used for utility/kitchen etc. The March assessment report does not take into account. This drawing nor the position of the new Bath/wc room The Drawing that the Mach assessment is based upon.

The light to 2 rooms, the study, and the kitchen/bedroom at the rear of the basement that the application drawing has an en-suite bath and wc room not the other 2 rooms. as outlined.

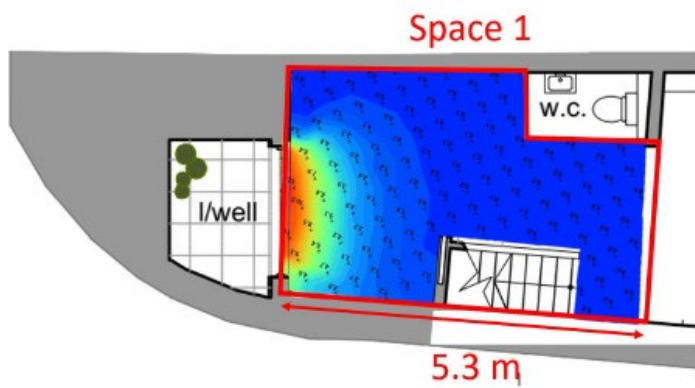


Figure 5.2: Space 1 Daylight Factor Plot

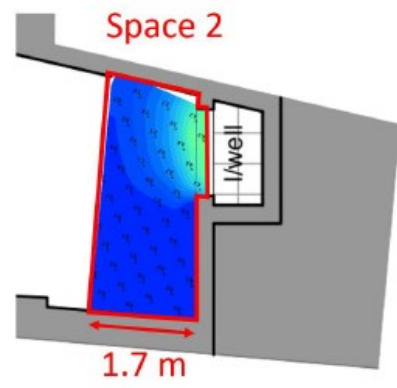


Figure 5.3: Space 2 Daylight Factor Plot

Floor	Room	Target ADF (%)	Predicted ADF Results (%)
Basement	Space 1	1.0%	1.4
Basement	Space 2	1.0%	1.0

Table 5.2: Basement Room ADF

We quote – *“The investigation has yielded two room depths for the assessed spaces, as indicated on Figure 5.2 and Figure 5.3. The depth for space 1 can be increased further to achieve an ADF closer to 1%, however, this would result in a larger room with worse lighting distribution with some areas seeming dark without the use of additional lighting. Therefore, the space has been limited to a wall at the bottom of the basement stairs found on a previous issue of the floor plans.”*

Our response – it is evident that the intention for the basement is for living space and separate rooms. The rear room the bedroom with the en suite bath wc has approximately 1.7m of questionable certification light. However, the 1.7m and less towards No. 31 wall is not sufficient size as a bedroom or habitable room etc. anyway.

Conclusion Mathematics summary in short re inaccurate plans

From pages 5 & 9 - The **Impossibility** of the Front Garden Being **27m²**

- The proposed rear garden is claimed to be 27m².
- The footprint of the house is claimed to be approximately 45% and 45m².
- The total area of the property is claimed to be approximately 99m².
- The front garden is NOT declared, the following calculation finds its area as 27m²
- $99\text{m}^2 - 45\text{m}^2 - 27\text{m}^2 - \text{front garden} = 0$
- $99\text{m}^2 - 45\text{m}^2 - 27\text{m}^2 = \text{front garden} = 27\text{m}^2$

From pages 2 & 6 & 12 - The proposed **rear garden** with the Roc 7 clause 3 is approximately **15m²**

- The existing size of the rear garden (from Barco, AREAS SITE SURVEY) is 23.27m²

- Approximate area of the bike store from Roc 7 clause 3 (jw696-680) is 4.3m²
- Unaccusable area of the rear garden (due to the gap of the rear extension return wall adjacent to the existing boundary fence being approximately 150mm) is approximately 3.973m²
- $23.27\text{m}^2 - 4.3\text{m}^2 - 3.973\text{m}^2 = 15\text{m}^2$

From page 7 - The Actual House Coverage Percentage is **49%** (NOT as claimed to be 45% of the plot area)

- From Design & Access Statement Rev B. (2015 & 2021) the house footprint is 45m²
- From the Barco, AREAS SITE SURVEY, the total area of the property is 91.9m²
- $45\text{m}^2 \div 91.9\text{m}^2 = 0.4897 = 49\%$

From pages 6 & 7 - The actual size of the existing front garden is **13.7m²**

1. NOT as JDW Architects proposed to be half of 45% of the remainder of the plot area which is claimed to be 27m².
2. The front garden of 31 from the Barco, AREAS SITE SURVEY, records the area of to be 24.85m² which is visibly larger than 31a's front garden. This makes it **impossible** for the 31a's front garden to be 27m², rather we have worked it out to be 13.7m² as existing.
 - From the Barco, AREAS SITE SURVEY, the total area of the property is 91.9m²
 - From the Barco, AREAS SITE SURVEY, the existing house footprint with the path is 50.9m²
 - From the Barco, AREAS SITE SURVEY, the (best case scenario) existing rear garden is 27.39m²
 - $91.9\text{m}^2 - 50.9\text{m}^2 - 27.39\text{m}^2 = 13.7\text{m}^2$

HGY/2021/1470 & HG/2023/1199 is additional living/ floor space required for 5 persons 2 bedroom's - not space for 1 bed as outlined in the application as the room is 12m²!

3. Now we take into the equation the comparison of all the above calculations now adding the basement office room into the equation according to the declaration of size given for the first-floor bedroom in the plan jw696 – 112 Ver H, resubmitted with the **HGY/2021/1470** application.
 - a) If we take the measurements of the bedrooms of the first floor what we have been given that would amount to 9m² for the office/bedroom (in this application, it's a bedroom) second bedroom 14m² total = 23m². The proposed basement office is 9m² which would give a total

of 32m² of living space that has been declared. The remainder of the living space according to the declaration would be anywhere from 62m to 70m. in the PDA Report on page 7 herein paragraph (i) it is declared that the living space required for a 1-bedroom house is 70m². So accordingly, the rest of the living space would be 38m². It is highly unlikely considering that the first floor is 23m² as declared, that the LDK area on the ground floor would amount to 28m² when the bedroom above is only 14m². It was clear to all in the planning department once a calculator came in to play that the basement would be needed from the get-go **as living accommodation** as the proposal is too small even for a one-bedroom proposal. **See Exhibits 1, 2, 5, 41, 47, & 48**

- b) In the application HGY/2021/3137 The footprint was declared as **62m²** and has not changed since the applications 3137, & 1470, the drawing that we are now arguing jw696-112 Rev H, is the same as jw696 – 100 D regarding footprint as to ground and first floor. The London Plan Policy 3.5 and accompanying London Housing Design Guide set out the space standards for all new residential developments to ensure an acceptable level of living accommodation offered. A two-storey, two-bedroom house that can accommodate four people is required to be at **least 83sqm**. This does not meet those criteria and must be addressed likewise. It was expressed in the appellants PDA report in 2021 that the minimum required living space was for 3 people 70sqm. However, the earlier permission was for 5 persons and a 4-bike shed. **See Exhibit 27 & 41.**
- c) Therefore, 38m² extra living accommodation is needed for a 2 floor 3-person house, as we know the 9m room is infact 12m² which is now a 2-bedroom 5- person house that requires a minimum living space of **83m²**. That is 12m² plus 12m² plus 14m² = **38m²** that would leave the rest of the required living space to be a total of **45m²**. Here again, the basement will need to be used and the plan is that it will be used as living space! The basement is NOT fit for living space PERIOD; therefore, the applicant would not be able to obtain planning consent for such a project in any event. The simulated light test is also inaccurate .
- d) It is rather odd to apply for a bath w.c. room at the rear of the proposed basement when the living quarters are on the 1st floor and there is a separate w.c. on the ground floor. We can only conclude that the plan for the proposed basement is to use it for living accommodation like in previous applications. **See Exhibits 1, 2, 5, 41, 47, & 48**
- e) Basic math, speaks for itself. One can't make a silk purse out of a sow's ear! Who is the applicant and his professionals trying to kid, this project cannot be built as to plan.

In the section headed: - “Planning Balance and Conclusion”, of the appeal dismissal decision dated 14 September 2022 reference to the planning application HGY/2021/1470,

- f) The inspector notes in favor of the LPA in paragraph 16 we note the entire content of the paragraph, and we will comment on some of the points we will bold those point that we want comment on; we quote: - *“The council are required to apply a buffer to their supply of housing land.*

However, as the proposal is for the demolition of a single storey existing dwelling and replacement with a two-storey dwelling with basement, there would be no net gain in the provision of homes in the borough. The appeal proposal would therefore not contribute to the supply and delivery of housing in the area, and as such the provision of housing does not weigh in favour of the proposal".

- g) Since this decision and the appeal decisions the London Borough of Haringey has reached its planning quota! **The housing quotas have been reached.**
- h) Note the content of the sections underlined in bold, they all appear to outline that this proposal is not conducive to the net gain in the provision of homes in the borough. They would not contribute to the supply, neither does the proposal weigh in favor of the proposal. The conclusion must be used in conclusion to the application HGY/2023/1199 which is similar to what is outlined above. As outlined the previous similar applications and appeals have failed using the same footprint and were dismissed. In this objection the application is for a two-storey house and basement "...is for the demolition of a single storey existing dwelling and replacement with a two-storey dwelling with a basement...". it is clear from the inspector's conclusion that the proposal was not acceptable for the following reasons from the Council perspective, we quote: - "*there would be no net gain in the provision of homes in the borough.*"
- a. "*The appeal proposal would therefore not contribute to the to the supply and delivery of housing in the area*"
- b. "*and as such the provision of housing does not weigh in favour of the proposal*".
- i) in conclusion the LPA can only come to the same conclusion as is outlined here! See - Appeal dismissal decision dated 14 September 2022 HGY/2021/1470 - **Exhibit 52**
- j) Please respond as soon as possible as to the Section 70A request and to all our other points and questions. As we believe a full response is necessary for re-submission of accurate objection documents.

Yours sincerely

Liora Eliahoo

(As attorney for my mother, Mrs. Violet Eliahoo, the owner of 31 Riverside Road, London, N15 6D)

Eliahoo Second Objection letter HGY/2023/1199