

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

BS"D

Oskar Gregersen
Case officer
Planning services
6th Floor, River Park House
225 High Road, Wood Green,
London, N22 8HQ

19th of October 2023

Our Objection letter to planning application HGY/2023/2519 at 29 Riverside Road London N15 6DA – to change of use from a single dwelling house to a 4-bedroom HMO.

Dear Oskar,

I am Liora Eliahoo, the daughter of Mrs. Violet Eliahoo. Mrs. Violet Eliahoo is the registered freehold owner at the Land Registry of no. 31 Riverside Road, London N15 6DA but because of her mental condition, she is not able to administer her own affairs and therefore I look after her affairs pursuant to a lasting power of attorney entered on the register on the 19th of October 2014, as per the copy attached. I live with her at no. 31 Riverside Road, London N15 6DA.

1. We Object to the change of use of 29 Riverside Road London N15 6DA, from a single dwelling house to a 4-bedroom HMO for the following reasons.
2. Especially after following the sequence of applications, to now a change of use to a 4-unit HMO. There is further information required for us to be able to respond appropriately. See below a few concerns we have and require an appropriate response to assist us in preparing my clients objection.
 - a. The number one objection against the proposed conversion at number 29 Riverside Roads from a family house into HMO is specifically stated as prohibited within the South Tottenham SPD, and as such this application for conversion to an HMO can only and must be refused.

- b. Currently the site has permission for a Type-3 extension, as is typical for the immediate area and the road. It is noted that a ground floor rear extension, Approved HGY/2023/1759 and a Type-3 extension HGY/2023/1756 were approve respectively.
- c. This proposal will cause the loss of a family dwellinghouse, which has already been granted planning permission as indicated in the above paragraph for maximum expansion with an additional 2 floors extension in line with a Type-3 extension and with an additional large ground floor kitchen extension that would suite a large family in desperate need for this type of accommodation.
- d. The areas local policy is to allow the homes in this are to be extend i.e., Type-3 extension that are specifically used for large family units. There are many such hoses that have been extended and converted this way, as HMO's are now forbidden in this area.
- e. There are no HMO properties along this street they on both sides of the street.
- f. An HMO is out of character with the street scene and will impact us and all the neighbours of the road in particular the Orthodox Jewish neighbours.
- g. If planning permission was somehow granted there would be no way to police, the future tenants and what type of character they may be.
- h. Future tenants and their dress code, rudeness, weekend parties, music, and noise that the immediate neighboured is not akin to.
- i. Extra car parking space may be required by the tenants, there is no parking space now.
- j. It is worthy to also take into consideration that as there is very little garden space, the children of the street play together on the road and pavements, the dress code of the proposed tenants may be offensive to the Ultra-orthodox Jewish neighbours and this may cause clashes and contention on the road, which can be prevented by refusing such a proposal.

The applicant stated in the application form the following:

3. In the application form there is a question regarding **Superseded consents**. The question is clear, - *“Does the proposal supersede any existing consent(s)”?* the applicant responded **NO**.
4. Their response appears to be incorrect as outlined herein there has been 3 previous applications over the last 4 months. Of which 2 applications were approved and 1 was refused.
5. The declared **site area** is recorded as 145m² and the **declared GIA** is also 145m².



6. The recorded GIA found on the plans DWG No – H03 dated 11-09-2023 proposed floor plans. Records the internal GIA as follows. The rooms/ flats are referred to as **UNITS**.
 - a. G/F unit 01 is recorded at **15.6m²** there is also a shower room attached to the unit.
 - b. G/F unit 02 is recorded at **21.3m²** there is also a shower room attached to the unit.

- c. F/F unit 03 is recorded at **14.3m²** there is also a bathroom attached to the unit not included in the meterage.
 - d. F/F unit 04 is recorded at **12.6m²** there is also a bathroom attached to the unit not included in the meterage.
 - e. The total GIA recorded for the four units is **GIA 63.8m²** plus the size of the kitchen, the **GIA is recorded as 10.5m²** (this declared meterage for the kitchen may be undersized for this type of proposed application). The total declared **GIA is declared as 74.3m²**. Despite this fact the declared GIA in the application is either **145m² or 140m²**, therefor the declared statement is incorrect, and would render the application null and void.
 - f. We have taken the liberty to factor in the remaining undeclared meterage areas that have not been declared on the drawing, **our estimated arears have been liberally assessed for the size, from the declared kitchen size of 10.5m²** (the areas sizes declared if required will have to be verified on the site visit).
 - g. The additional square area that have not been declared are the two bathrooms on the F/F and the G/F and F/F hallways.
 - i. F/F bathroom of Unit 03 is 5m² +/-
 - ii. F/F bathroom of Unit 04 is 6m² +/-
 - iii. F/F hallway is 5m² +/-
 - iv. G/F hallway is 9m² +/-
 - v. This is a total of + **25m² +/-**
 - h. If we take both totals from above declared and undeclared gross internal area, **GIA is 74.3m²** in addition the above undeclared GIA areas are **25m² +/-**. **The total GIA area equates to 99.3m²**. the fact is that the GIA is less than 100m², that is 40 - 45m² less that that was declared on the application form declaration.
 - i. Below we will now look at the discrepancy of the **Site Area** and the same Square meters declared for the **GIA** (we believe that all meterage needs to be investigated on site) and we endeavour to outline (in our opinion) why this false meterage narrative has been declared.
7. The above exercise has outlined the problem of the misinformation regarding the 'GIA' add up the GIA for the existing and propose 4 units the GIA is way less than stated 145m²?

8. In section **Residential Units** the declared GIA (gross internal floor area) per unit: 140 square metres. In this section it is also declared **Habitable rooms per unit:4** and **Bedrooms per unit:3**
9. One must assume that regarding **Habitable rooms per unit** their response is 4, must mean that the intention is to have 4 rooms per unit?
- Bedroom
 - Kitchen
 - Bathroom / shower area
 - Dinning place for table and chairs
10. And under heading **bedrooms per unit** their response is 3, which answer is correct. The application is for 4 units that would be including 4 bedrooms as per plans, the question is how many persons will be in each unit 1 person or 2 persons per unit? This confusing information must have an impact on the application and our objection to reject the application.
11. In the section **Residential units to be added**, the 4 units appear as self-contained, where the GIA it is declared as 35m² per unit. The stated fact of 35m² has been proven to be incorrect (as outlined above and below). This section has serious question as to what is going on here and as to what the bigger picture is. We quote verbatim from the application questionnaire.

e. ***“Residential Units***

GIA (gross internal floor area) per unit: 140 square metres

Habitable rooms per unit: 4

Bedrooms per unit: 3

f. ***Residential Units to be added***

Residential Unit Type: HMO

Development type: Conversion

Number of units, of this specification, to be added: 4

GIA (gross internal floor area) per unit: 35 square metres

Habitable rooms per unit:1

Bedrooms per unit:1”

How many self-contained units are there at 35 square meters?

12. There is a further contradiction as to the declared size of the internal GIA as outlined on the drawings then that of the information supplied in the declaration under the heading **GIA (gross internal floor area) per unit:** their declaration is **35 square meters**. The largest unit (02) is declared on the plans as **GIA 21.3m²** and the smallest unit (04) is declared as **GIA 12.6m²**. **there are no units that measures GIA 35m²**. The information supplied is incorrect. Its worthy to note

that as 4 times 35m² equals 140m² (not possible) however the actual space per unit is declared in the application drawings.

13. Are the 4 units going to be self-contained and all have kitchens; this is not declared.

14. Just some of the misleading information that requires further clarity by the planning department.

Background of the applications from my clients perspective

- a. HGY/2023/1759 approved for a Type-3 extension loft. We did not object as we believed at that time that the information supplied was accurate and correct, when in fact latter it was found to be misleading.
- b. HGY/2023/1756 approved additional 4m in length extension in addition to the existing Ground Floor kitchen extension. As outlined above we did not object at that time.
- c. HGY/2023/2092 refused first floor extension. This is when we became aware of the inaccuracies as to information that were supplied by the applicant.

15. The application for an additional floor living space (this type of application is now accepted policy within the South Tottenham SPD. This includes Riverside Road the application site especially needed for the larger Jewish families) we were made to believe that the application was in fact for that purpose (HGY/2023/1759 approved loft).

16. Then there was a subsequent application for additional kitchen space on the ground floor this again looked in keeping with the previous application (a above) and in keeping with the local updated plan of 2015. (HGY/2023/1756 was approved giving an additional 4m in length added to the existing Ground Floor and the proposed area was for a kitchen extension).

17. Then came the application HGY/2023/2092 for an additional bedroom extension on the first-floor extension, we strongly objected to the application as it had a direct impact on us. Whilst appraising this application we found inaccurate information that was supplied in this application that also has an impact on the original application that we took on face value to be true and accurate information as in the previous application HGY/2023/1756 (this was all laid out in our previous objection HGY/2023/2092).

18. We need further clarity on this application as the application is form C3 to C4 (at this point we need clarity) on this application.

- a. Does the previous approved application of the loft and ground floor extension fall away if in the unlikely event the property is be granted consent as an HMO.
- b. Or will the loft still be an option after a possible HMO approval? To which we object.
- c. In other words, will the applicant be able to further apply to extend their HMO by adding the extra 2 previously approve floors (for a single dwelling house) to the HMO scheme, which now appears to be the plan from the get-go.?

Conclusion

19. A conversion into HMO's is specifically stated as prohibited within the South Tottenham SPD, and as such this application for conversion to an HMO must be refused.

20. Currently the site has permission for a Type-3 extension, as is typical for the area, and a ground floor rear extension. Approved under HGY/2023/1759 and HGY/2023/1756 respectively.

Yours sincerely

Liora Eliahoo

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