

41 Whymark Avenue
London
N22 6DJ

Cameron Sturges
[REDACTED]

Dear Mr Sturges,

Following our email exchanges with you (attached), we have resubmitted the application below for your consideration:

Original Application	
Application No	HGY/2023/1248
Proposal	Change of use from Class C3 Dwelling House to C4 House of Multiple Occupancy: 4 bedrooms for 6 people.
Site Address	41 Whymark Avenue, Wood Green, London, N22 6DJ
Application date	19 May 2023
Case Officer	Cameron Sturges
Valid Date	10 May 2023
Original Decision (not attached)	(1) DM Decision (2) DM Final Officer Report (3) LBH HMO's Comments (4) LBH Transport Comments (5) Location Plan (6) Map Snapshot (7) List of individuals Consulted
Refusal Reasons	(1) The gross original internal floor space of the existing dwelling house is below 120 sqm (2) The conversion of the single-family dwelling into a HMO has resulted in an unacceptable loss of family housing for which there is an identified need. (3) The proposed access to the cycle parking from the living room is not considered acceptable
Other matters raised (2)	(4) Use of single bedrooms (5) Inadequate waste management for 6 people

Application Attachments

- (1) Application Form Redacted
- (2) M-1 – HMO - Comparative Site Plans
- (3) M-2 – HMO – Existing Plans
- (4) M-3 – HMO – Proposed Plans
- (5) M-4 – HMO – Area Plans
- (6) Cil Form
- (7) PlanMX289790 – plan for 41 Whymark from 1965

We have attempted to address your objections below and provided further evidence and information to address the objections raised.

1. Objection: Gross Floor Space Below 120 sqm (Policy DM17)

The report concludes that, *"the gross original internal floor space of the existing dwelling house is below 120 sqm and therefore considered too small for conversion and contrary to Policy DM17 of Haringey's Development Management DPD (2017)."*

There appears to be an error in your assumption that the shower room on the ground floor was not included in the *"original footprint"*.

However, we confirmed that this was the case in 2020, during a pre-application discussion with Ms Madondo, who confirmed:

"The original, un-extended, internal floorspace of the existing dwelling is approximately 120 square meters therefore just means 120m2 threshold set out in Policy DM16. As such, the principle of the proposed conversion is acceptable" – [REDACTED] (13 November 2020)."

We attach the Land Registry plan from 1965 (New attachment (1)) showing the original footprint for your information. The step out area (now a shower & WC) is a part of the original footprint and are not a recent extension.

We understand from neighbours that this feature was originally an outside toilet. The attachment shows this feature as prominent in other houses along the same road.

Notes on the Report

55.8sqm

In the report, it is stated *"the original un-extended floor area of the property is estimated at approximately 55.8sqm"*, *"for an older property such as the application site, 55.8sqm, would be the property's floor area in 1948"*. As a point to note, the first floor floorspace is 57sqm, not 55.8sqm as set out in the original plans, which on that basis would make the total floorspace 114sqm, not 55.8sqm.

124.5sqm

Nonetheless, the report includes the statement that *"5.3 The existing internal floor space of the existing dwelling is approximately 124.5 square metres excluding the ground floor level rear extension"*, which appears to contradict the overall decision.

Summary

We suggest that the original floor space of this property adequately meets the 120 sq. m policy requirement.

2. Objection: Loss of Family Housing (Local Plan Policy SP2 and Policy DM17):

The conversion of the single-family dwelling into a House of Multiple Occupation (HMO) raises concerns about the 'loss of family housing'. We acknowledge your concern and understand the need for homes for a variety of different groups within the area.

However, for the reasons highlighted below, we do not believe that there is any loss of family housing:

Overall demographic

The evolving demographic of Haringey, as revealed by the 2021 census, indicates a shift towards smaller households and individual living, challenging the traditional demand for large family homes.

Estate agent demand

Haringey estate agents specifically report a greater demand for smaller, more affordable properties like flats and split terraced houses, both for purchase and rental.

Smaller properties like studios, shared accommodation and one-bedroom flats are more affordable and, therefore, are in higher demand, especially among individuals and small families. Victorian homes are less popular than smaller property options.

Current use

The property in question is not currently serving as a family home, but rather is occupied by a professional couple without children.

HMO flexibility for small families

HMOs offer flexibility to the landlord as well as to smaller families who are looking for different options to manage their costs.

The reality of family homes in Haringey

For the reasons mentioned above, the reality is that the majority of families renting in Haringey are looking for smaller properties,

A further detailed analysis with respect to affordability in the Borough is set out in the attached appendix.

3. Objection: Access to Cycle Parking (London Plan Policy T5)

Report quote: *"The proposed access to the cycle parking from the living room is not considered acceptable and is therefore contrary to London Plan Policy T5."*

We acknowledge the concern regarding access to cycle parking and this has been addressed in our revised plan.

4. Objection: Waste Management

Report quote: *"Given the small size of the front forecourt, there is concern that there would not be sufficient space to accommodate refuse storage for a HMO occupied by up to 6 adults."*

We understand that our current proposal is in line with the current Haringey waste management requirements, which currently include a requirement to:

- adhere to the council's waste collection schedule; and
- ensure the provision of adequate waste storage solutions; and
- the allocation of designated bins for different types of waste - general waste, recyclables, food, and garden waste.

A standard kerbside collection full set is included in the original plan, as follows:

- One 360 litre (885d x 620x 1100h) wheelie bin for refuse
- One 360 litre (885d x 620x 1100h) wheelie bin for recycling
- One food waste box (350-x300 x 360H)
- One garden waste sack (450x450x600)

5. Double vs Single bedrooms

“5.7 The proposal would include 2 double person’s and 2 single persons lettings, however, the drawings indicate the beds as being doubles which would suggest that up to 8 people could reside in the property at any one time.”

We have revised the drawings to provide for single beds. Since the planning permission (and subsequent licensing) covers less than 6 individuals. Therefore, it would not be possible to have 8 tenants living in the property. The double bedrooms are merely provided to demonstrate that two people may live in that room.

However, we have adjusted the plans to demonstrate single beds and rooms on the basis that it would be expected that any room would be for one tenant.

6. Summary

We are committed to resolving any outstanding issues and ensure that our development aligns with local planning policies and guidelines.

We ask that you reconsider our original application in light of the information provided in this new application.

Kind Regards,

Joanna Rogers

Director

APPENDIX 1

AFFORDABILITY IN THE BOROUGH

Property purchase

As of 2022, the average property price in Haringey is £762,317, indicating a significant price growth of 9.8% from the previous year. The most common property type sold was flats, accounting for 34.1% of properties, followed by terraced houses at 26.5%. Detached houses, while the most expensive on average, represented only 1.5% of properties sold. The most common price band for property sales in Haringey was between £600k - £800k.

Property prices may point towards the reason that 40% of the Haringey population rents property from the private sector.

Property rental

In terms of rental costs, Haringey rentals are above the London average. The average monthly rent for different types of properties in Haringey varies:

- A studio costs on average £878 per month.
- A one-bedroom property costs on average £1,253 per month.
- A two-bedroom property costs on average £1,577 per month.
- A three-bedroom property costs on average £1,953 per month.
- A four or more bedroom property costs on average £2,544 per month

Income in Haringey

The 'Haringey at a Glance State of the Borough September 2022' report further emphasises the income disparities in the borough, noting that median hourly pay rates are below the regional and London averages.

A significant portion of the population in Haringey earns below the London Living Wage, making traditional rental properties unaffordable for many.

The higher cost of larger properties, both in terms of purchase, rent and running the home, suggests that they might be more difficult to find within affordable ranges for most residents. This could mean that there is a lower demand for such properties, or they are targeted at a more affluent demographic.

The truth is that large properties do not represent value for money for these families.

HMOs, in this context, provide a viable solution for residents to manage housing costs more effectively. This shift towards HMOs reflects the evolving housing needs and economic constraints within the community.

Under-utilisation and the 'affluent demographic'

In living and renting in Haringey for a number of years, we observe that Haringey has continued to be a popular destination for professional couples, early in their relationship who want to live together before they make a further commitment.

The recent 2021 census appears to reflect this change in the borough, since couples without children now represent 16% of the population, a rise of 5% over a decade. This is the highest rise in a demographic, second only to single residents over 65 years old.

This number is likely to continue to increase. This could be influenced by various factors, including the overall cost of living in London, the cost of living crisis in the nation, the demographic makeup of the area, or the general housing market trends in the city.

It is inferred that these 'couples without children' are more affluent than their counter-parts within children, since they have two high incomes and lower outgoings. These renters can afford higher rentals and perhaps their ability to afford to rent homes in Haringey has contributed to the significant increase in those rents.

Professionals like Haringey because it has good transport links and (until recently) was more affordable than surrounding boroughs such as Hackney and Islington.

Certainly this is in line with Council's Policy DM17 to foster diverse and sustainable communities and therefore it is important to cater for these groups of renters as well as families. It could be argued that one or two people living in a three-bedroom property leaves the property under-utilised, a practice that may act against the intentions of Haringey property policies.

Whilst perhaps some of these couples may settle in Haringey to raise a family, the 2021 census data does not suggest that to be the case. Whilst couples without children have increased by 5%, couples with children have only increased by 0.1% in the same period.

Observation suggests that these couples are more transitory, moving to Haringey short-term for work before purchasing a property and settling down further outside of the borough. Whilst they love the transport links and larger terrace homes because of their character and size, they tend to move here temporarily before moving on and buying in more affordable areas, perhaps outside of London.

HMO as options for families.

The flexibility of HMOs

Whilst in the past, HMOs have been associated with single professionals, they are now emerging as a viable living option for other demographics, including smaller family units and single-parents.

HMO units may provide even better options for families because living with another small family may provide them with their own space, with the benefit of sharing costs or costs being included in their rent.

With a cost-of-living crisis in full force & effect, many families renting in the private sector are further disadvantaged because restrictions on landlords prevent them from sharing their home and thereby sharing costs.

If they bring in a lodger or sub-let, they need landlord consent, but the landlord cannot consent or they risk breaching licencing or planning obligations. And families don't dare risk eviction by breaking their tenancy agreement without the landlord's consent.

If families are privately renting in the borough they want a quality home in Haringey, close to good schools that they can afford to rent and manage on a long-term basis. They do not want large Victorian properties, since the rents constitute nearly half of an average salary in the borough and (regardless of energy efficiency) big homes are costly to heat and manage.

The reality is that smaller families are less able to find suitable affordable property that actually meet their current needs.