

Job ref: 320/611 Finchley

Planning Statement

in respect of

611 Finchley Road, London NW3 7BS

For

Conversion of four bed house to nine room HMO

DCPL On behalf of

Smart Environment Group

August 2023

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1. Introduction



Photo 1 -611 Finchley Road- Arrowed

- 1.1 This Planning Statement supports a proposal for the following:
- Change of use from a four bed house to a 9 room HMO (sui generis)
 - A car free development is proposed
 - New bin stores will be added to the front garden which will remain landscaped
 - Access to the rear garden will mostly be via the side alleyway which provides access to shared garden space.
 - Cycle parking will be located in the rear of the property
 - The front of the house will remain unaltered.
- 1.2 This statement will consider how the site can be developed in accordance with Camden's Local plan 2017, the London Plan 2021 and national planning policy, the NPPF 2021 and associated planning guidance including the Fortune Green and West Hampstead Neighbourhood Plan 2015. The applicant will also demonstrate that the proposals will meet Camden's HMO Standards 2020.

Site Location

- 13 611 Finchley Road is a two story semi-detached property with an original attic floor with an original front dormer. The rear of the building has a single storey outrigger across half of the width of the rear part of the house and with substantial two story bay windows on the other half of the rear of the house. There is one original rear dormer in the roof.
- 14 The site forms a section of large semi-detached houses on both sides of the Finchley Road. The application site is not within a conservation area and is not listed, nationally or locally.

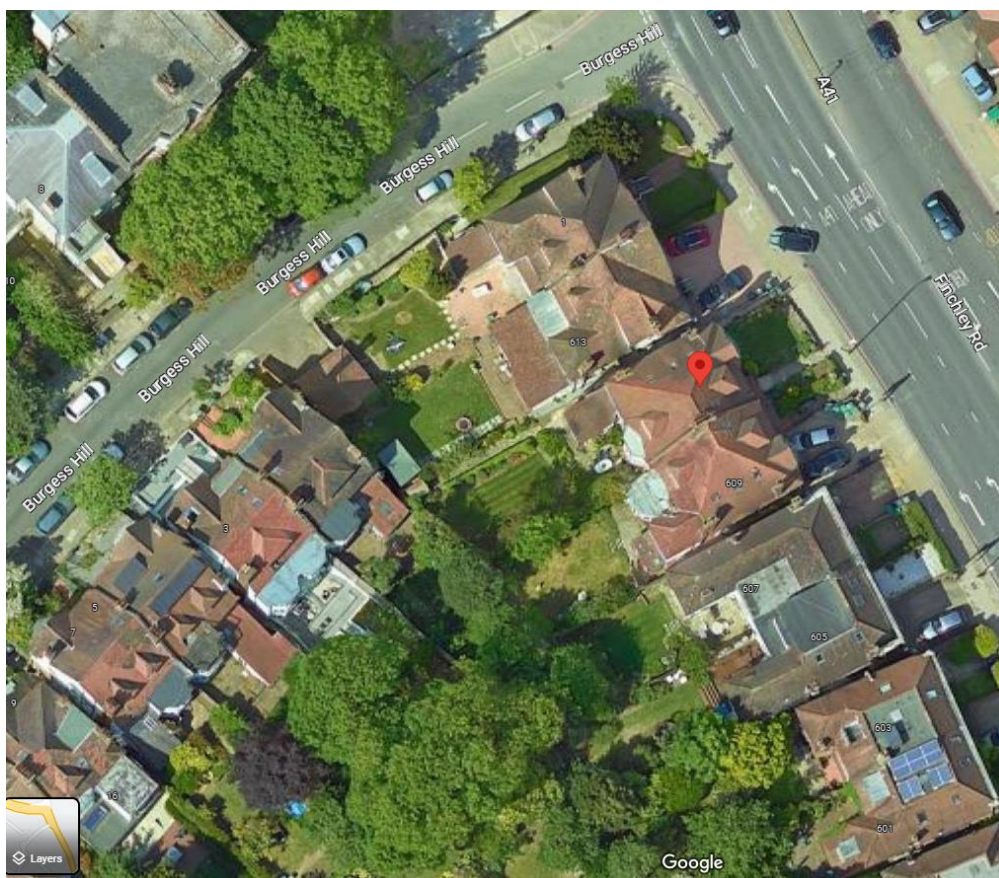


Photo2 Aerial photo of 611 Finchley Road

- 15 The application site is well suited to HMO residential development being close to open spaces (Hampstead Heath is less than 800m away) and local shops (300m away). The site is well connected by public transport, being a PTAL4 (see Appendix 1) on a scale of 1-6 where 6 is excellent. The nearest underground station is a 12 minute walk from application site.
- 16 The site is on a major arterial route (on a red route) and five lanes of traffic generate a significant amount of noise. In this respect an HMO use may have advantages over the use of the site for family housing. There is currently no car parking on site and the front garden is retained under these proposals. A car free proposal is envisaged.
- 17 Retention of the site for a large family home would require the clearing of the garden for car parking. This raises both highway access issues on the red route and also the loss of most of the soft landscaping on the site.
- HMO Standards and Proposals
- 18 The housing related standards for Camden HMO's are set out in the Council's HMO Standards for Houses and Flats, December 2020. This documents stipulates minimum bedroom sizes and minimum levels of facilities and their size standards. Table 1 shows how the Council's minimum room sizes to accommodate either one or two persons are met. All the rooms could accommodate two people as they are over 9m without counting the floorspace of the bathroom facilities. It is likely that most rooms would be let to single people.
- 19 Most of the rooms are significantly in excess of minimum standards. The two loft rooms have more restricted head height but only the floorspace over 1.5m high is counted in the floor space calculations.
- 1.10 The kitchens are located on the ground and the first floors. The larger kitchen on the ground floor would serve the needs of the ground and some of the first floor residents while the first floor residents would use the first floor. No room would have a cooking facility more than a floor away. The overall Kitchen floor area proposed is 22.8m² as opposed to a requirement (even assuming high occupancy) of 22m².

Table 1 Room Sizes

level	HMO Room Number	Size GIA (m2)	Bathroom size in addition (m2)	Kitchen (m2)
Ground	1	27.3	2.7	18.0
Ground	2	18.3	2.7	
Ground	3	9.4	2.3	
First	4	9.6	2.3	4.8
First	5	20.7	2.7	
First	6	18.2	2.7	
First	7	10.4	2.7	
Loft	8	14.5	2.9	
Loft	9	15.5	2.6	
Total		143.9	23.6	22.8

- 1.11 The two kitchens will accommodate four sets of kitchen facilities, each set to include a sink, fridge, cooker food store and area for refuse with 500mm length of work top per person.
- 1.12 There is enough linear metres of work surface to meet Camden's minimum standards. The proposals will meet Camden's standards for mechanical ventilation, lighting, sockets and waste in each kitchen.
- 1.13 Each room will have an en-suite WC, Wash hand basin and shower. Camden's minimum standards are 2.2m2 and the proposed are all in excess of this.
- 1.14 The front garden will contain waste refuse storage areas and the rear garden will contain bicycle parking spaces. All residents will be able to access the rear garden through the side access way. The two ground floor rear bedsits will have access onto a section of private garden.

- 1.15 The pre-application proposal was for two storey rear extensions but all extensions have now been excluded from the proposals.

2. Planning History

2.1 The application site appears to have been in family use for a long period and no applications have been submitted on site at least in the recent past.

2.2 There is no evidence of planning applications for adjoining properties either, It is likely that 609 Finchley Road was historically divided into a number of small self contained apartments.

Pre-Application proposals

2.3 The applicants undertook pre-application discussions with the Council in the spring of 2023 receiving a pre-application response on the 20th July 2023. I have set out a summary of the council's responses to the pre-application submission and how the applicants have responded to those comments and what amendments are proposed as a consequence. This is set out in Table 2 below:

Table 2 Council pre-app comments and amendments proposed by applicants

Summary of Council Comments	Applicant's Response
The proposed change of use would only result in the loss of one self-contained house which is acceptable.	Noted
For HMOs it is expected that double rooms are 11sqm, single 9sqm, bath/toilet 2.8sqm and shower/toilet 2.2sqm. The room size relates solely to the living area and not the sanitary facilities within the room. The proposed rooms, minus the en-suites which are shown on the plans, seem to accord with the required space standards and as such would be of a suitable standard in this regard.	All HMO rooms meet Camden's size standards
The top floor rooms are in the roof space, it should be noted the council don't count any	Any space under 1.5m is not included in the floor space calculations

space with a ceiling height of below 1.5m.	
There would be two kitchen areas at ground and first floor level which would be acceptable. The proposed occupation of the HMO is unknown, and the number of occupiers would be controlled via the HMO license.	Noted
there appears to be a door at the top of the stairs at first floor level. It should be noted if the property were to be split into flats, different requirements/facilities would need to be provided, in order to be deemed acceptable	This door will be removed-there is no intention to self contain any unit
The property would have to have adequate fire precautions, in line with the LACORS guidance which we follow in regard to licenced HMO's	LACORS guidance will be followed and is set out in the D&A
The proposed change of use should be acceptable as long as it is secured as a long-term addition to the supply of low-cost housing. This can be achieved through controls on rental rates (set at no more than 80% of median rent for a studio flat in the borough, or alternatively through a payment in lieu	Rental rates set at 80% of Median Rents for a studio flat are acceptable
The applicant has provided three design proposals for a rear extension, each option is considered unacceptable	All proposals for rear extensions have been removed. I have not answered specific points about the various extension options proposed as these are no longer relevant.
In line with Policy T1 of the Camden Local Plan, we expect cycle parking to be provided in accordance with the standards set out in the London Plan. Whilst there is no specific	10 spaces have been proposed to include a space for visitors.

standard for HMOs, the requirement in this instance would be for 1 space per room, giving a requirement for 9 spaces	
It is recommended that the cycle store comprise 5 Sheffield or M-shaped stands (10 spaces) in a covered enclosure to protect the cycles from the elements. A revised plan showing this should be submitted with the full planning application	Sheffield stand racks are now proposed as set out in D&A.
In accordance with Policy T2 of the Camden Local Plan, all 9 rooms should be secured as on-street Residents parking permit (car) free by means of a Section 106 Agreement	The permit free policy is agreed but the applicant's preference is to allow for a planning condition or if not that a unilateral undertaking is provided.
Construction of the rear extension is likely to prove difficult. It is therefore recommended that a Construction Management Plan (CMP) be secured by means of the Section 106 Agreement together with the associated CMP Implementation Support Contribution of £4,075.60 and CMP Impact Bond of £7,874.	The rear extensions are to be omitted and other works will be limited so a CMP is not required-see section 3 of this report.
If a formal application were to be submitted, it should include details of waste storage and collection for the residential units. CPG Design provides further guidance on waste storage and collection requirements.	Waste Facilities to meet Camden design Standards will be provided.
The council would welcome a green/biodiverse roof and solar pv's on any extension as it would contribute greatly to the biodiversity of the area.	No extension is now proposed.
The proposed change of use may be considered acceptable subject to further	Noted. No rear extension is proposed.

clarification and approval from the HMO licencing team and securing it as low-cost housing. As stated, the principle of a rear extension is acceptable, but the council would either consider a single-story ground floor rear extension or a half width two story extension acceptable.	
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- 24 The Council in its pre-app response is clear that an HMO on this site is acceptable in principle subject to meeting the Council's standards which the application now does. The main concern for the Council was the size of the proposed rear extensions. The proposal now leaves out any proposal to include a rear extension. The application now meets the Council's concerns.

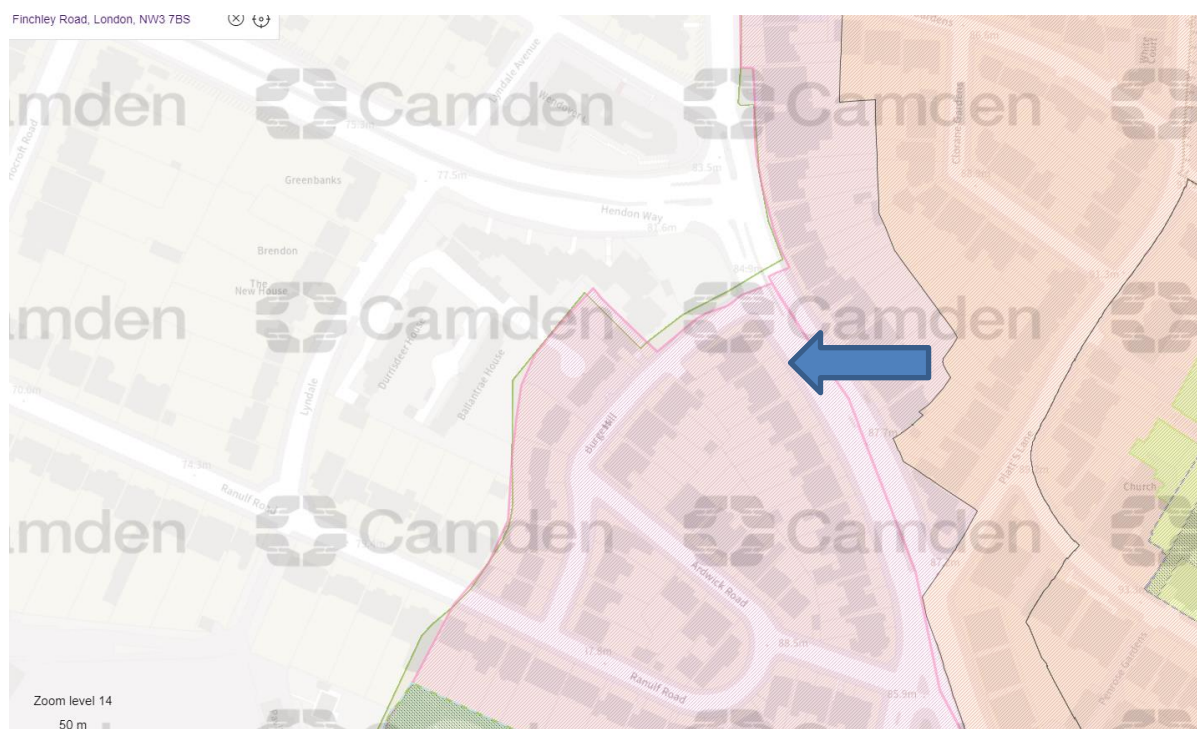
3. Planning Policy and Guidance

3.1 Any development scheme will need to be in accordance with the following documents

- Camden Local Plan 2017
- London Plan 2021
- NPPF 2021
- The Fortune Green and West Hampstead Neighbourhood Plan 2015

Camden local Plan 2017

3.2 The application site has no significant site designation in the Council's Development plan Document.. The application site area sits within the Fortune Green and west Hampstead Neighbourhood planning area (see plan 1 below)



Plan 1 Extract from Policies Map-611 Finchley Road is in Neighbourhood Plan Area

Policy H10

- 33 Policy H10 of the Local Plan 2017 is Camden's main HMO policy. The policy sets out the Council's aim to ensure that there is continued provision of housing with shared facilities to meet the needs of small households with limited incomes and modest space requirements. This means supporting the development of HMO's provided that the following conditions in policy H10 are met:
- a. will not involve the loss of two or more self-contained homes;
 - b. will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it is shown that the site is no longer developable for self-contained housing;
 - c. complies with any relevant standards for houses in multiple occupation;
 - d. contributes to creating a mixed, inclusive and sustainable community;
 - e. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity; and
 - f. is secured as a long-term addition to the supply of low cost housing, or otherwise provides an appropriate amount of affordable housing, having regard to Policy H4
- 34 In respect of policy H10(a) the proposals do not involve the loss of two or more self contained homes
- 35 The site is not identified for self contained housing in a development plan document (see paragraph 3.2 and Plan 1) or through a planning permission. So an HMO use is appropriate on this criterion.
- 36 The proposals comply with the relevant Council's standards for HMO's as set out in 'HMO Standards for houses and Flats with Shared Use' 2020. The size standards are set out in part 1 of this Planning Statement. It is safe to conclude that the proposals comply with those standards and therefore policy H10 (c).
- 37 The proposals do contribute to a mixed community. The local area sustains a good proportion of expensive family housing and the proposals offering more reasonably priced rental accommodation provides a counter balance to this. Camden's Local plan (paragraph 3.271) recognises that HMO's fill a gap in the rental market as rents for a room are approximately 70% of the cost of a self-contained studio flat and 50% that of a self contained one-bed flat.

- 3.8 Fortune Green Ward (in which the application site lies) has 34.6% of its households living as single person households according to the 2021 Census, compared with 39% of single person households in the borough as a whole (2021 Census). The proposals with one and two bed HMO dwellings contributes to making a mixed community in this area.
- 3.9 The Council's HMO records show that there is a limited number of HMO's in the neighbourhood and generally limited in the wider NW3 area. This complies with policy H10(d).
- 3.10 Policy H10(e) requires that any new HMO does not create an over concentration of such uses in the local area. Camden maintains a register of HMOs and records 4518 addresses. However there are only 3 properties that appear to be licenced within the same postcode area (NW3 7BS) and only 31 in the whole of the NW3 postcode. This area does not therefore suffer an over concentration of HMO's.
- 3.11 Policy H10(e) also requires that any HMO should not cause harm to nearby residential amenity. Number 611 Finchley Road is semi-detached with 609 which is already divided into small flats on all floors of the house. The conversion of the application site is unlikely to create significant noise nuisance. As far as number 613 goes this is separated from 611 giving a good level of mitigation. It is more likely that the traffic on the Finchley Road will create a larger noise issue than the use of the application site as an HMO.
- 3.12 Policy H10(f) requires provision of affordable housing as set out in policy H4 of Camden's Local Plan unless the HMO is secured as a long term addition to the supply of affordable homes. The HMO will be a long term addition to the supply of (relatively) affordable living for single people and couples.
- 3.13 It is my view that the proposals meet the tests in policy H10 (a to f).
- Affordable Housing
- 3.14 Policy H4 requires a contribution to affordable housing if the residential proposal adds one or more homes AND involves an addition of 100m (GIA) or more. As the proposals do not add over 100m² GIA, affordable housing is not a requirement.

Extensions

- 3.15 The proposed extensions at pre-application stage have been removed and are not part of the proposals.

Car parking and Cycle parking

- 3.16 The London Plan 2021 sets out the latest car and bike parking standards. In respect of car parking, the London Plan recognises that car free development is acceptable in inner London boroughs with at least a PTAL 4 accessibility level. The applicants would be comfortable in signing up to a car free agreement. This would actually reduce on street car parking demand as the existing house would have access to resident's car parking. The second benefit of this approach will be to retain garden planting.

- 3.17 The London Plan requires a cycle parking space for each studio flat and one visitor space and so 10 bike spaces are provided in the rear garden.

Recycling and Waste bin provision

- 3.18 The proposals will meet Camden's waste and recycling bin requirements and the site plan sets out waste bin provision in the front garden.

Amenity Space

- 3.19 The 9 rooms will share the existing large rear garden amenity space of over 150m².
- 3.20 Access will be via the side entrance. As the finished floor level of the building is much higher than the access path the windows on the flank wall, this does not cause a privacy problem. Cycle parking for 10 bikes is proposed for the rear garden.

The Fortune Green and West Hampstead Neighbourhood Plan 2015

- 3.21 The Neighbourhood plan makes some recommendations on the enforcement of standards in HMO's, recognising community concern about the quality of some existing HMO's. These proposals are clearly an attempt to produce a substantially better quality HMO with generous room space standards.

- 3.22 These proposals meet Neighbourhood Policy 1 in that the proposals exceed local environmental standards.

Flood Risk

- 3.23 The application site is not in an area of flood risk (see Appendix 2) and no flood risk assessment is required.

Disabled Access

- 3.24 The proposals deal with an existing property that only has stepped access. It would be possible to create a small chair lift to overcome the stepped access if required.

Scope of Works

- 3.25 The works have been limited in scale and complexity to minimise waste and no extensions or earth works are proposed. No structural works are anticipated. There will therefore be very limited waste removed from site. All deliveries will be by a single small van, from Burgess Hill, which can be done after hours (restrictions are between 10am and midday) if needed. Deliveries from van to site will be by hand. A two month programme for the works is predicted.

- 3.26 The works are not heavy, nor complex and a Construction Management Plan is not required.

Access

- 3.27 If so required a small wheelchair hoist could be provided in the front garden porch to allow for wheelchair access.

4. Conclusions

- 4.1 The proposals in all cases exceed Camden's HMO standards as set out in the council's 'HMO Standards for homes and flats with shared use 2020'. Many of the bedsits are double the size of the minimum requirements. The intention is to provide spacious quality accommodation suitable for the location of the application site.
- 4.2 This HMO provides for a gap in the market, catering for single and couples that cannot afford a self-contained flat and who are not eligible for social housing.
- 4.3 There is not a concentration of HMO's in the local area around the application site, nor is there an over concentration of single person housing.
- 4.4 The application site forms a semi-detached dwelling with the attached site being formed of small flats. The proposed HMO will not cause undue harm to neighbours amenity.
- 4.5 No extensions are now proposed.
- 4.6 The HMO has good shared amenity space and adequate cycle parking in the rear garden and good waste and recycling facilities in the front garden.
- 4.7 A car free scheme is appropriate for its Zone 4 PTAL inner London location.
- 4.8 For the above reasons the proposals should be supported. The proposals are sustainable and following National planning guidance (NPPF 2021) a presumption in favour of sustainable development should be applied and the application consented.

David Carroll Msc. MRTPI

August 2023

Appendix 1 Webcat PTAL

Address or co-ordinates

611 Finchley Road, London, UK

Go

Access level (PTAL)

Time mapping (TIM)

PTAL: a measure which rates locations by distance from frequent public transport services.

Map key - PTAL

0 (Worst)

1a

1b

2

3

4

5

6a

6b (Best)

Map layers

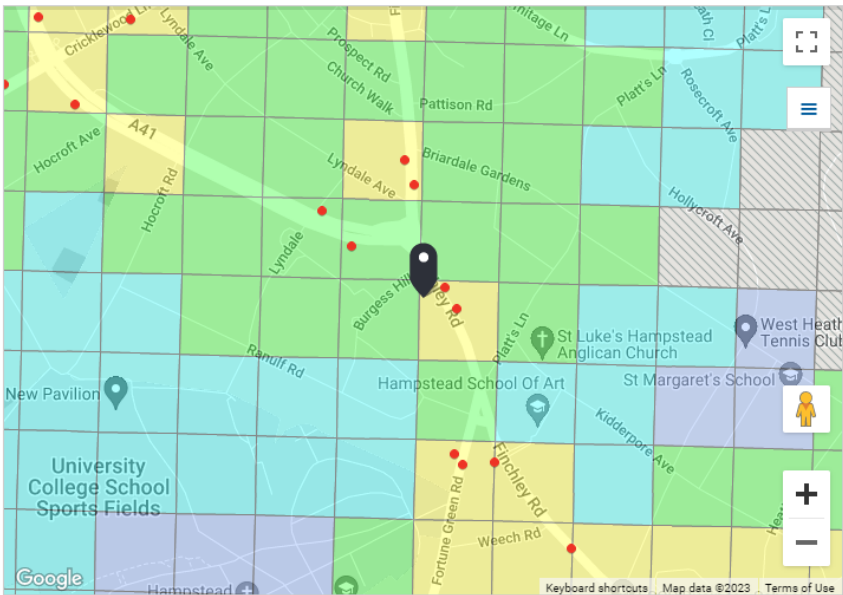
PTAL (cell size: 100m)

Scenario

Base Year

☐

Highlight locations where PTALs have changed from Base Year



You can click anywhere on the map to change the selected location.

PTAL output for Base Year

4

611 Finchley Rd

611 Finchley Rd, London NW3 7BS, UK

Easting: 525100, Northing: 185971

Site has PTAL 4 very good Public Transport Accessibility Levels in London

Appendix 2 Flood Risk Map

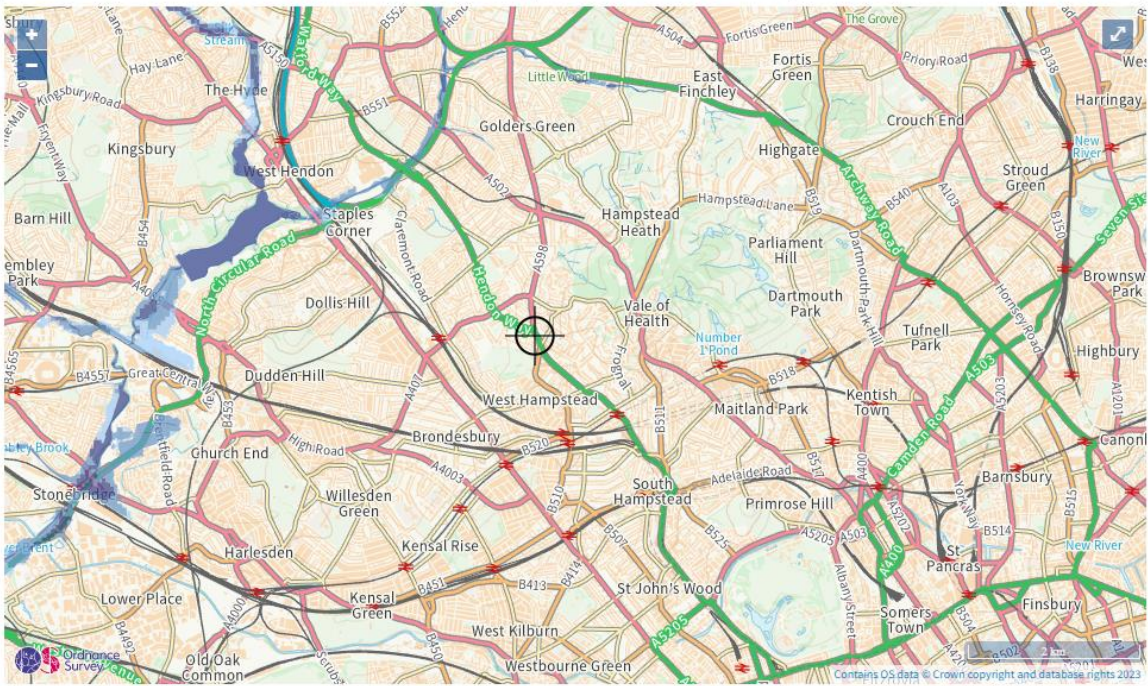
Select the type of flood risk information you're interested in. The map will then update.

Flood risk

Extent of flooding

Location

Enter a place or postcode



Extent of flooding from rivers or the sea

High Medium Low Very low Location you selected

Site is within Flood Zone 1 and does not require a flood risk assessment