

# **DESIGN AND ACCESS STATEMENT**

**38 PRIORY ROAD, LONDON, NW6 5SJ**

***PROPOSED WORKS:***

***NEW ROOF WITH REAR AND SIDE DORMERS***

***20<sup>th</sup> February 2024***

## **CONTENTS:**

<b>1.</b>	<b>INTRODUCTION</b>	<b>PAGE. 2</b>
<b>2.</b>	<b>DESIGN</b>	<b>PAGE. 2</b>
	2.1. USE	
	2.2. AMOUNT	
	2.3. LAYOUT	
	2.4. SCALE	
	2.5. LANDSCAPING	
	2.6. APPEARANCE	
<b>3.</b>	<b>ACCESS</b>	<b>PAGE. 5</b>
<b>4.</b>	<b>HERITAGE</b>	<b>PAGE. 5</b>
	4.1. INTRODUCTION	
	4.2. BACKGROUND INFORMATION	
	4.3. APPLICATION PROPOSAL	
	4.4. IMPACT	
	4.5. HISTORY OF PRIORY ROAD CONSERVATION AREA	
<b>5.</b>	<b>POLICIES</b>	<b>PAGE. 10</b>
<b>6.</b>	<b>CONCLUSION</b>	<b>PAGE. 14</b>

## 1. **INTRODUCTION**

This Design & Access Statement has been prepared by Masterplan Design Ltd to be read in conjunction with the plans submitted for 38 Priory Road, London, NW65SJ

The application is for a roof with rear and side dormers as per plans submitted.

The property is within a conservation area but is not listed and is not within a flood zone.

The living space created by the rear and side dormers to the main roof will form part of the flat on the second floor. The additional living space will be accessible via stairs from the second floor to the roof space.

Both rear and side dormers will have new sash windows with Velux roof windows to the front elevation of the main roof as shown on the plans submitted.

The building is set back from the main pavement and is primarily slabs with planting. The boundary on the back of the pavement line is a low brick wall.

## 2. **DESIGN**

### 2.1. **USE**

The existing building has residential use with flats on lower ground floor, upper ground floor, first floor and second floor. In total there are four individual flats.

The proposal seeks to reconstruct the main roof of the building and proposing to add a rear dormer to main roof, plus a side dormer to left hand elevation of the main roof. The proposed works would look to improve and refurbish the entire roof structure and conform to current building regulations and standards. The proposed new space created by the rear and side dormers will be an addition to the existing second floor flat and will be accessed by standard staircase leading from within the second floor flat.

#### **Design standards:**

- The design of the scheme considers the following where possible.
- Car parking: There are currently no parking spaces within the front yard. There will be no change to the existing. Street parking is available if required.
- Cycle parking: Cycle parking has been provided in the proposals to the front yard as shown on the plans.
- Approach and access: The approach into the building will remain as existing. Due to the level spilt in the building layout it has not been possible to provide level access for wheel chair users due to the entrance stairs. There will be no change to existing rise or going of the staircase. New steps will be provided to the lower ground flat which are compliant to part M of the building regulations. It is not possible for the scheme to accommodate a lift in the scheme due to the restricted space in the front garden.
- Doorways and Halls: All hallways are designed to be 1200mm minimum wide. The internal door openings to habitable rooms have minimum clear opening of 775mm, in compliance with part M of the building regulations. This excludes the door into bedroom 2 of the first floor plan proposal. All doors have a 300mm wide unobstructed space on the pull side of the door where possible.

- Noise and Sound proofing: The internal layouts aim to stack similar room uses over each other in order to reduce the noise impact between flats. Generally living rooms are located to the rear and bedrooms to the front apart from the new bedroom within the lower ground floor extension. The proposed new internal walls consider acoustic regulations between rooms as well as between common area and flat set out in Part E of the building regulations.
- Ceiling heights: Habitable room will meet the minimum ceiling height requirement
- Lighting: Automatic external lighting which is operated by daylight sensors will be provided to the entrance doors to front and side. All features will be in keeping with the character of the building.
- Storage: This proposal will provide additional and adequate storage areas for the second floor flat.

## 2.2. AMOUNT

The existing site area is 286.1m<sup>2</sup>. The existing external footprint of the building is 77.23m<sup>2</sup>. The proposed external footprint of the building is 101.1m<sup>2</sup>. The proposed extension on the lower ground floor is 3m deep with a flat roof creating an additional 32.77m<sup>2</sup>.

Location	Gross internal floor area m <sup>2</sup>		
	Existing	Proposed	Increase
Lower ground	77.23	101	23.77
Ground	80.2	80.2	0
First	79.8	79.8	0
Second	81	81	0
Roof	0	9	9
<b>Total</b>	<b>318.23</b>	<b>351</b>	<b>32.77</b>

The above table indicates the gross internal floor area for each floor. The increase in gross internal floor area equals to 32.77m<sup>2</sup>.

Location	Existing	Proposed	No.	No. of person	Gross internal floor area of
Lower	1	1	4	4	101
Ground	0	1	2	3	80.2
First	0	1	2	3	79.8
S	0	1	2	4	81
<b>Total</b>	<b>1</b>	<b>4</b>	<b>9</b>	<b>15</b>	<b>315</b>

The bedroom sizes to each flat comply with the councils requirements where by all double bedrooms are above 11m<sup>2</sup> and single bedrooms are above 6.5m<sup>2</sup>. Room areas for all other rooms are shown on the proposed plans submitted with the application.

### 2.3. LAYOUT

Externally the proposal will only alter rear and side elevations of the roof, however, the overall context of the roof will remain as per existing.

Internally the dormer on the left-hand side elevation of the roof will provide space to install staircase leading to the loft space created by the proposed rear dormer. The space created by the proposed rear dormer will be utilised for a usable room which will part of the second floor flat. The roof eaves space will be utilised for additional storage space for the flat.

Both the side and rear dormers will have sash windows plus Velux roof window to front will provide ample natural light and ventilation for the room created by the proposal.

### 2.4. SCALE

The scale of the proposed rear and side dormers does not have a significant impact on the scale of the building or the original roof structure.

A large percentage of the roof is retained as per original and due to height of the existing chimney stack elevation wall large section of the rear dormer is hidden from view on right hand elevation. Additionally, the height of the dormer is below the line of the top ridge, therefore the rear dormer will not be visible from the front of the building. The side dormer is minimal in scale and partly obscured by main front roof ridge, so the visible impact has been kept to the minimum. Due to the minimal scale of the dormers it does not have an impact on the neighbouring properties in regards to daylight, overlooking or obstruction of views.

Number of neighbouring properties have similar rear and side dormers, and in fact quite a few of the neighbouring properties has significantly larger rear, side and front dormers, which are far more prominent in comparison to this proposal.

### 2.5. APPEARANCE

Generally, the existing windows and mouldings, entrance doors, external wall and drainage goods are in poor condition and in need of repair and renovation.

All mouldings and other building features will also be painted off white. Drainage goods to be painted off white on elevations to match walls. Main gutter from roof in black to match adjacent property.

Roof to be repaired and refurbished fully. Tiles and flashings will all be replaced with new but to match existing. Flat roof to the dormers to be asphalt. Conservation style rooflights to front roof elevation with double glazing from the Rooflight Company or similar. The proposed dormers side elevations will be covered with same slate tiles as the main roof.

### **3. ACCESS**

- 3.1. This proposal will not have any impact on the existing public transport services. For more on Access please refer to 2.1 Use above.

### **4. HERITAGE**

#### **4.1. INTRODUCTION**

Situated in the Priory Road Conservation Area, the scheme has been designed to have minimal visual impact upon views from Priory Road or from the properties within Priory Terrace. The proposal will not result in any adverse impact on the amenity of surrounding properties and will act to enhance the wider conservation area.

This report sets out the planning considerations behind the proposed development scheme. Providing a description of the site and surrounding area together with the planning history, a description of the proposal. It identifies the relevant planning considerations and tried to address the relevant planning policies. It reviews the issue of the conversion of the building and the impact on amenity, and assesses the impact on the conservation area and concludes.

#### **4.2. BACKGROUND INFORMATION**

- 4.2.1. No. 38 Priory Road comprises one half of a pair of 19th Century semi-detached houses. The site is located toward the northern end of Priory Road. The 4-storey building comprises a lower ground floor flat, whilst the maisonette on the upper floors is in use as a single dwelling house spread.

The building is rendered and partially painted over with a white finish. A columned portico and stairway provides access to the main entrance at ground level. The glazing takes the form of painted timber sash windows with decorative mouldings on the front elevation. A low brick wall forms the extent of the front garden curtilage.

The roof has a high central chimneys stack, though due to its height and shallow pitch the roofline itself is not visible from street level.

Access to the rear of the property runs along the northern boundary with No 40 Priory Road, with an independent side access to the lower ground flat.

The garden area is largely paved over, with a number of trees along the boundary.

#### **4.2.2. Surrounding Area**

The surrounding area is characterised by residential uses with Priory Road itself comprised for the most part of a mix of three and four storey buildings of a variety of brick and white rendered appearance. Many of the properties have substantial porticos reached by steps from street level.

The properties have small front gardens with many featuring mature trees and low brick walls defining the front curtilage. Others have areas of hard-standing to accommodate parked vehicles.

#### **4.2.3. Relevant Planning History**

There are no planning history records for this site.

There have been a number of existing precedents and or consents however, granted over recent years, which include front, side and rear dormers to the main roof of the properties concerned.

### **4.3. APPLICATION PROPOSAL**

#### **4.3.1. This application seeks planning permission for a rear and side dormers to the main roof.**

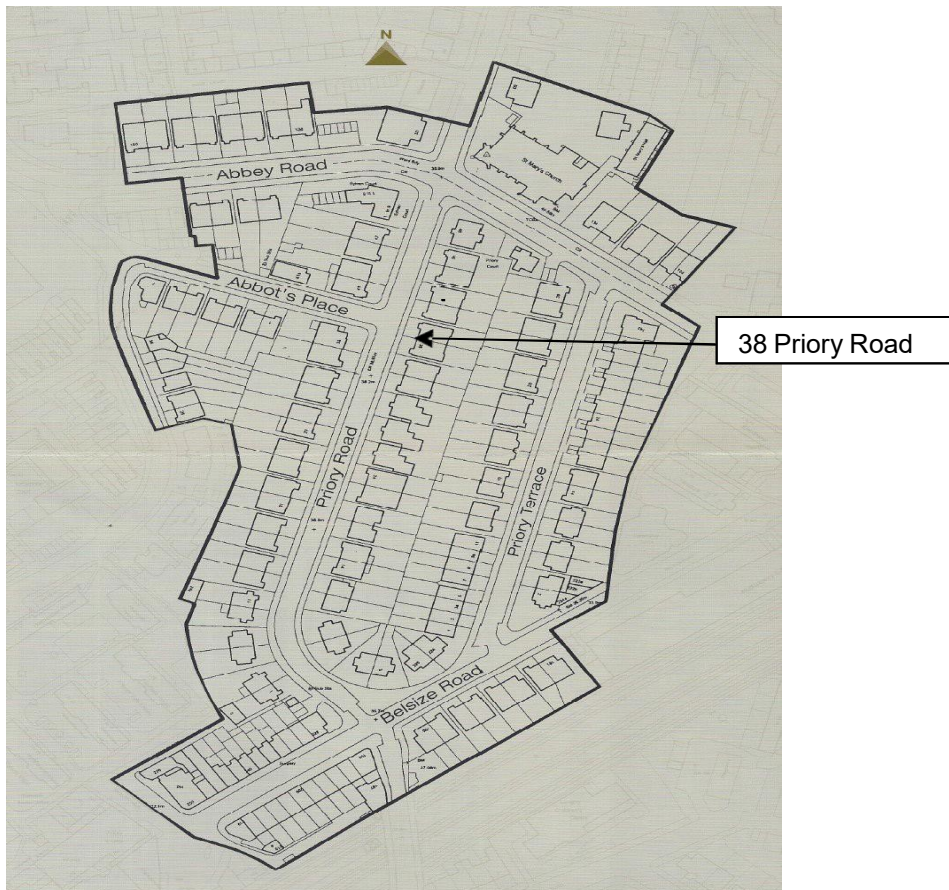
The space created will form part of the second floor flat.

#### 4.4. IMPACT

- 4.4.1. The site is identified as being located within the designated heritage asset of the Priory Road Conservation Area. PPS5 sets out the clear policy that there is a presumption in favour of the conservation of designated heritage assets. It is therefore important to understand the character of the conservation area and what role the existing building plays, in order to assess the impact of the proposals and their potential for enhancing the asset overall.
- 4.4.2. The Conservation Area Proposals Statement details the history and character of the Conservation Area. The statement explains that the development of the estate proper began when Colonel Upton inherited the Howard Estate in 1846:-  
„He made a building agreement for 15½ acres with developer George Duncan. They built pairs of good class villas in Kilburn Priory, Priory Road and St George’s Road with a style that reflected the developments of the Eyre estate in St John’s Wood. The properties are substantial three storey buildings “good value for servant keeping families who did not aspire to their carriages”“

#### 4.5. HISTORY OF PRIORY ROAD CONSERVATION AREA

- 4.5.1. The conservation area derives its name from a twelfth century Benedictine Priory which was situated just outside the modern conservation area. The Dissolution of the Monasteries in 1536 resulted in the demise of the Priory and a complex line of ownership followed. During the period up until 1819, when Fulke Greville Howard purchased the estate, the area was known as the Abbey Farm Estate. At this time the estate was in agricultural use, indeed Abbey Road was originally a footpath from London to the Priory whilst the footpath that connected Kilburn Priory and Hampstead Heath later become Priory Road.
- 4.5.2. In the 1820’s a group of fairly large villas and eight cottages was built. Work then came to an end until recommencing in 1846 when Colonel Upton inherited the estate and began to build „good class villas in Kilburn Priory, Priory Road and St George’s Road“. Smaller closer packed terraces were built at the Kilburn end of Belsize with shop floors at ground level, a third of which were built by small builders under lease. Later developments include St Mary’s Church (Listed) which was built in 1857. The northern section of Priory Road was constructed in 1874 whilst the last section within Priory Terrace was completed by 1894.



Map identifying the Priory Road Conservation Area

- 4.5.3. In 1837, the London and Birmingham railway line was cut through the estate and a station sited at what is now known as Kilburn High Road Station. Further infrastructure was provided with a major new road that ran to the railway bridge.
- 4.5.4. In the post war period there has been little extensive development other than the demolition of 49 and 51 Priory Road in the 1950"s to make way for Sylvian Court. A terrace of 8 houses was built in the 1960"s and a pair of semi-detached houses were constructed at the expense of 224 and 226. The 1980"s saw backland development at No. 48 , No. 53 Priory Road and the Vicarage.
- 4.5.5. On a smaller scale, a range of development has taken place including alterations to the roofs to include dormer windows, basement and rear and side extensions.
  - 4.5.5.1. Characteristics and impact upon the conservation area
- 4.5.6. The original buildings in the Priory Road Conservation Area were influenced by Osborne House which was built for Queen Victoria in 1849. Following on in this vein, the conservation area is regarded as representing a pocket of Victorian, Italianate inspired development reminiscent of Renaissance Italy.
- 4.5.7. Semi-detached villas consisting of three storeys and a basement are the chief style of dwelling in the area. In terms of the features that characterise the area, these are defined in the conservation statement as follows, (however in many cases these features have been lost):



***„visible shallow pitched roofs with overhanging eaves supported on brackets, horizontal string courses, rounded or Romanesque arches, double arcaded windows, campanile, window casements capped by various pediments, sash windows with margin lights, porticos, stucco, stuccoed rusticated quoins, decorative ironwork at windows and railings up front steps, decorated cornices.“***

- 4.5.8. On Priory Road itself, the height and scale of the dwellings increases from south to north. Two-storey with basement are represented by Nos. 1-31, this then increases to three-storeys with basement from No. 33 onwards.
- 4.5.9. Most of the properties have a raised ground floor with steps leading up to decorated porches. Roofs are either hipped or gabled and some feature side dormers. There is also some variation in window design, some being arched whilst most have decorative features. Larger scale dwellings with campanile can be found on the corner of Abbot's Place. Over time forecourt parking has been introduced to the detriment of the local character particularly at Nos 21, 43 and 45. However, low boundary walls and planting can still be found at a number of locations.
- 4.5.10. Overall, the Priory Road Conservation Area remains a good example of mid 19th century suburban development. The statement identifies a significant number of the properties as making a positive contribution to the special character and appearance of the conservation area, including the application property, 38 Priory Road.
- 4.5.11. The proposal will have no impact on the overall layout of the conservation area and its quiet, residential character. Indeed, it will complement the layout and character by continuing and improving the residential use of the building by upgrading the overall standard of the property.
- 4.5.12. The proposed dormers are confined to the rear and side elevation of the main roof which is inline with other similar dormers that have been granted consent in Priory Road over a period of the number of years, No.32, No.30, No. 40, just to state a few.
- 4.5.13. The dormer to the rear is set at a low level to top roof ridge and will not be visible from front of the building at all. The side dormer has been kept to a minimal size in order to provide space to install the staircase leading on to loft room created by the rear dormer.
- 4.5.14. The conservation roof lights proposed for the main roof will be visible from street level on Priory Road, however they are inline with existing roof lights on many neighbouring properties.
- 4.5.15. The repair of other external features on the front elevation and relocation of the drainage pipes away from the front elevation will provide a genuine improvement to the appearance of the property and views along Priory Road, to the benefit of the conservation area.

- 4.5.16.** The proposal respects the traditional features of the property and the street as a whole and ensures that its original appearance and the character of the conservation area is not compromised. The proposed alterations will have very limited visual impact either on their own or cumulatively and have been designed to a high standard so that they provide attractive and well-proportioned additions to the property appearance. Accordingly, it is considered that the scheme will positively contribute to the character and of the conservation area and, as such, comply with the guidance in PPS5.

## **5. POLICIES**

- 5.1.** In this section the relevant national and local planning policies pertinent to the application are considered.
- 5.2.** The statutory development plan for this site comprises the Camden UDP (adopted 2006). A number of the UDP policies were „saved“ beyond 26 June 2009 further to a Direction from the Secretary of State.
- 5.3.** At the present time the Camden UDP continues to carry statutory weight. The London Borough of Camden is however at a relatively advanced stage in the preparation of their Local Development Framework (LDF). The examination hearing sessions for the Core Strategy and Development Policies DPD took place in May- June 2010. The Inspector’s report was received at the end of August 2010 and his findings are under consideration by the Council at the present time. These draft policies are therefore also considered below.
- 5.3.1.** Adopted London Borough of Camden Unitary Development Plan (UDP) (2006)
- 5.4.** The UDP Proposals Map indicates that the site falls within the Priory Road Conservation Area.
- 5.5.** Policy B1 provides the general design guidelines that the Council will employ to ensure that all development in any part of the Borough is of a high standard. It seeks to ensure that development is sensitive to its setting, safe and accessible for all whilst simultaneously being sustainable and adaptable. Elements such as landscaping are to be used to maintain amenity and improve overall attractiveness. Consideration will be given to how proposals have taken into account local factors such as building lines, plot sizes, height, scales and natural features. The impact on views will also be assessed.
- 5.6.** Policy B3 and Policy B7 provide specific guidance on alterations and extensions to ensure that they are not detrimental in design terms. Moreover, the policy wording makes clear that consent for development in a conservation area will only be granted if it preserves or enhances the special character or appearance of the area. The policy indicates that consideration will be given to whether development is subordinate to the original building and that features are retained and restored. Complementing or matching high quality materials will be sought and unsympathetic development removed.

- 5.7. The application proposal has been designed to integrate into the surrounding area in a subtle and unobtrusive fashion. The lower ground floor extension will extend beyond the existing rear building line; however, care has been taken to ensure that it maintains the articulated form that is currently expressed. This not only helps to maintain the historical plot layout including well-proportioned amenity space and building line shape, but is also sympathetic to the adjoining properties in terms of ensuring there is no adverse impact on outlook and daylight and sunlight.
- 5.8. The proposal is small in scale and confined to rear and side elevation of the roof only. The proposal is subservient and the original building and does not infringe upon the amenity of neighbouring properties. The proposal is much smaller in scale than other existing precedents on neighbouring properties.
- 5.9. The introduction of low-profile conservation roof lights is not a new element within the street scene of Priory Road, indeed they are a feature of a number of properties including Nos. 48, 44, 42, 71, 91, 96, 99, and 108. In any event, by virtue of their positioning and their design they will not be detrimental to the character of the conservation area.
- 5.10. Policy SD6 of the Camden UDP confirms that the Council will not grant planning permission for development that it considers causes harm to the amenity of occupiers and neighbours.
- 5.11. Particular regard has been paid to preserving the amenity of both neighbouring properties and those within the application site itself.
- 5.12. Camden Council will oppose development that would result in the loss of 2 or more residential units in accordance with Policy H3. This application proposes the retention of a family sized unit with access to the garden and will result in an increase in residential units of a type that the council wishes to promote.

## **b) Local Development Framework (LDF)**

### **i. Core Strategy**

- 5.13. Policies CS1 and CS6 seek to make full use of Camden's capacity for housing and promote a range of housing types in order to eliminate social polarisation, in line with the drive for sustainable development and the objective of making the best use of land. This application will

result in the conversion and enlargement of the property to allow for an increase in the number of residential units. The unit that will be created are dwellings of a size that the Council has identified as being in demand and will therefore be attractive to a range of occupiers.

**5.14.** Policy CS14 acts to ensure that Camden remains attractive, thereby requiring development that respects local character, including that of conservation areas. As discussed above, the application proposals are in line with and complement the context, character and appearance of the surrounding area. The scheme has been designed to a high architectural standard and ensures that the character and appearance of the conservation area are preserved. In addition, the proposal will improve the layout of the current property, will have no negative impact on surrounding amenity, and will fit in with the character and appearance of the existing building. Accordingly, it is considered that the application proposal complies with all of the relevant policies within the draft Core Strategy.

**ii) Emerging Development Policies DPD**

**5.15.** Policy DP2 seeks to maximise the quantum of residential units in the borough by preventing their loss and promoting high densities.

**5.16.** The council intends to create mixed use communities by providing a mix of dwelling sizes and types. Policy DP5 acts to ensure that all residential development contributes to meeting a range of different size units including conversion of existing residential and non-residential floor space in accordance with the dwelling size priority table. This issue is discussed in detail in Section 6.

**5.17.** Policy DP6 and DP29 encourages development to be accessible and requires housing development to meet lifetime home standards. 10% should meet either wheelchair housing standards or be easily adapted to them.

**5.18.** Access to the building will remain as existing. Due to the split level in the building layout it has not been possible to provide level access for wheel chair users. However, the proposal seeks to improve the existing external steps up to ground level, which are currently uneven and of a poor standard. Other access alterations will be compliant with part K and part M of the building regulations.

**5.19.** Policy DP18 seeks to ensure minimum standards of parking are applied. There is currently no off street parking and this will remain the case.

**5.20.** Policy DP24 requires development to be of a high standard and therefore ensures that consideration is given to existing surroundings and respect is paid to general design principles. These include scale, materials, the provision of amenity space and interesting frontages, recognition of existing natural features and accessibility.

**5.21.** The character of conservation areas will be preserved and enhanced by virtue of emerging Policy DP25. The policy ensures that account will be taken of conservation area statements and management plans. The demolition of unlisted buildings and the removal of trees and garden spaces that contribute to the conservation area will be resisted.

**5.22.** Regard has been taken of the Priory Road Conservation Statement in developing these proposals and a full assessment has been made in Section 7 of the impact upon the heritage asset.

5.23. Policy DP26 addresses and seeks mitigation for the impact of development on occupiers and neighbours by only granting permission for development that does not cause harm to amenity. Factors that will be assessed include any resulting impact on visual amenity, overlooking, outlook, natural and artificial light levels together with appropriate design standards. These issues are considered in the next section of this report.

**c) Other relevant guidance**

i. Conservation Area Proposals Statement – Priory Road Conservation Area

5.24. The document provides specific guidance on appropriate development within the Priory Road Conservation Area. In this context it clearly establishes that in most cases rear extensions should be no more than one storey in height depending on its general effect on surrounding properties and the wider conservation area.

5.25. The statement indicates that extensions will be judged in terms of such matters as whether proposals are in harmony with the character and form of the original dwellings. Extensions should be subordinate and their design, scale and materials should be consistent with the original building. The statement also indicates that rear extensions will be unacceptable where they spoil uniform rear elevations.

5.26. The proposals as discussed above are in accordance with this guidance and the **attached property at no.40** has already been extended to the rear.

ii. Camden Planning Guidance 2006

5.27. This document sets out standards relating to residential development for both new properties, and conversions. It includes guidance on minimum room size standards for residential development and appropriate arrangements for waste storage. The proposal has been designed to a high standard with generous room sizes and room heights which in all cases either meet or exceed the minimum standards. The waste storage provision meets the requirements set out Section 5 of the SPG.

iii. PPS5 – Planning for the Historic Environment

5.28. This recent guidance sets out a policy approach to determining applications and to formulating policy affecting heritage assets including conservation areas. Decisions are based on the nature, extent and level of that significance, investigated to a degree proportionate to the importance of the heritage asset. Policy HE7.5 is relevant and states:

***“Local planning authorities should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use.”***

5.29. Policy HE9.1 states that:

***“There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be.”***

**5.30.** An assessment of the designated heritage asset, the Priory Road Conservation Area, is set out in the next section of this report and the positive contribution that can be achieved by the proposed external alterations are assessed in relation to the asset as a whole.

**5.31.** Summary

It is evident that there is a strong policy objective to ensure that developments of the nature proposed by this application fit in with and complement the appearance of surrounding areas, and are of a high quality of design which does not prejudice the character and amenity of existing buildings and conservation areas. It is clear from the above analysis that the application proposal sits comfortably alongside such policy ambitions.

## **6. CONCLUSION**

- 6.1.** This application proposes a rear and side dormers to the main roof in association with other external alterations at 38 Priory Road which have already been granted.
- 6.2.** The proposed development represents attractive, well-designed additions to the building which will provide high quality residential accommodation and complement the character and appearance of Priory Road Conservation Area as a whole. As such it is in accordance with the advice in PPS5.
- 6.3.** The conversion of the property into flats will provide the type of accommodation that has been identified by the Council as being a "high priority" within the borough. Moreover, the proposal will create a mix of unit sizes that will meet Camden's objective of combating social polarisation and will help to promote diversity in the borough. A family sized unit is retained in the development with access to the rear garden.
- 6.4.** The proposed dormers has been designed to fit in with the appearance of the existing building and have limited visual impact on the surrounding area. Views of the rear dormer will be extremely limited and will not have any adverse impact on the appearance of the street scene or the amenity of surrounding properties. Similar, larger dormers have been approved at No. 34, 32, 30, 40 etc. Priory Road.
- 6.5.** The other minor external alterations, including the rooflights and new sash windows to the dormers will again not have any adverse impact either on the amenity of neighbouring properties or upon the character of the conservation area and are a feature that are already present on a large number of properties in Priory Road.
- 6.6.** The proposal complies with all relevant adopted and draft planning policy guidance for the Borough.
- 6.7.** Accordingly, the application proposal is entirely acceptable in all respects and consent should therefore be granted.

**END OF STATEMENT**