

Planning Statement

13 Ebbsfleet Road
London
NW2 3NB

20th March 2024

Dear Sirs,

We have been requested by our client to submit an application for the following development:

‘Single storey side and rear extension together with roof extensions (granted under applications 2023/5324/P and 2023/5326/P) to facilitate the change of use from an existing dwelling (Class C3) to a 10-bed HMO (Sui Generis) for a maximum occupancy of 10 people. Provision of cycle and refuse storage.’

The application is accompanied by the following:

- Existing and proposed drawings, prepared by Redwoods Projects; and
- CIL Form.

The application fee of £578.00 will be paid online.

Site and Surrounding

The application site pertains to a two-storey semi-detached building situated on the southern side of Ebbsfleet Road. Notably, the property has not undergone previous extensions and features a two-storey outrigger. Ebbsfleet Road itself is characterised by pairs of semi-detached houses, mirroring the architectural style and appearance of the application site. The street boasts a diverse mix of single houses, converted flats, and Houses in Multiple Occupation (HMOs).

With a PTAL (Public Transport Accessibility Level) Rating of 5, the site benefits from excellent access to public transportation. Cricklewood Station, a mere 7-minute walk away, provides direct connectivity to central London. Moreover, the property is conveniently situated near Cricklewood Broadway Centre, offering a plethora of town centre amenities.

The property is not listed and does not fall within a conservation area.

Planning History

2023/5324/P - Erection of single storey rear extension depth 6m, height 3m and width 3.5m and single storey side and rear infill extension depth 6m, height 3m and width 2.8m – **Granted 18/03/2024**

2023/5326/P - Hip to gable extension, rear dormer and 2 x rooflight in front roofslope – **Granted 17/01/2024**

Proposed Development

The application is for the change of use from an existing dwelling (Class C3) to a 10-bed HMO (Sui Generis), together with alterations involving ground floor rear extension, hip to gable, and rear dormer extension. The HMO will be occupied by a maximum of 10 people. Communal kitchens, living, and dining space will be provided.

Cycle storage will be provided at the rear, whilst refuse storage will be provided at the front.

Planning Policy

The development plan consists of the following documents:

- National Planning Policy Framework (2023)
- London Plan (2021)
- Camden Local Plan (2017)

Careful consideration has also been given to the following:

- Camden HMO Standards (2020).

Planning Considerations

Principle of Development

The National Planning Policy Framework (NPPF)(2023) and London Plan (2021) advise that local authorities should seek to deliver a wide choice of high-quality homes, widen opportunities for homes ownership and create sustainable, inclusive and mixed communities. Policy H9(D) of the London Plan, specifically notes that boroughs should take account of the houses in multiple occupation in meeting local and strategic housing needs.

Policy H10 of the Camden Local Plan (2017) stated that the Council will support the development of HMOs provided that the development:

- a) Will not involve the loss of to or more self-contained homes;
- b) Will not involve a site identified for self-contained housing though a current planning permission or a development plan document;
- c) Complies with relevant standards;
- d) Contributed 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;
- f) Is secured as a long-term addition to the supply of low-cost housing.

With reference to points A and B, we confirm that the development will not involve the loss of two or more self-contained homes and will not involve a site identified for self-contained housing.

The HMO will comply with all relevant standards for houses in multiple occupation, in accordance with point C. Please refer to the 'Quality of Accommodation' paragraph below, which provides an in-detail assessment of the accommodation proposed.

Ebbsfleet Road is formed by a total of 24 buildings (all pairs of semi-detached properties). In addition to this, council tax searched identify a total of 45 planning units, likely resulting from conversion. Out of the 45 planning units, the council's HMO register identifies 4 properties to have been registered under HMO licenses. This means that a total of 9% of the street is in use for HMO purposes. The proposed development, if granted, would increase this percentage to 11%. Overall, it is considered that the proposed development would not result in a harmful over-concentration of HMOs along Ebbsfleet Road.

Officers are encouraged to consider the site's advantageous position near Cricklewood Broadway Centre, offering easy access to various amenities such as shops, cafes, restaurants, and banks. Additionally, the site boasts a PTAL Rating of 5, indicating excellent access to public transport, with Cricklewood Station just a brief 7-minute walk away, providing direct access to central London.

In light of its sustainable location, and the diverse housing topologies along Ebbsfleet Road, encompassing single dwellings, flats, and HMOs, the proposed development is well-suited for HMO living. It promises to enhance housing options in the area, adding to the supply of low-cost housing, promoting inclusivity, and fostering a vibrant mix of communities. The proposal therefore complies with points D to F as well.

It is therefore considered that the proposed development accords with national, regional, and local planning policies. On that basis, officers are invited to support the development, subject to all other planning considerations being met.

Impact on Character and Appearance

A number of extensions are proposed as part of the change of use. These include a hip to gable and dormer extension, together with ground floor side and rear extensions. It is important to note that the extensions have all been granted permission under separate applications (2023/5324/P and 2023/5326/P). In addition to the above, it is also noted that works are underway to implement them. It is therefore considered that the proposed development benefits from a significant fall-back position. On this basis, the extensions are considered to be acceptable and of no material harm upon the character and appearance of the application site, or the wider area.

Quality of Accommodation

Regard has been given to the Council’s HMO Standards (2020) when designing the proposed layout. For clarity, below is a breakdown of the internal residential provision:

Room	Size (m ²)	En-suite
Bedroom 1	12.58	Yes
Bedroom 2	10.34	Yes
Bedroom 3	10.08	Yes
Bedroom 4	10.53	Yes
Bedroom 5	10.53	Yes
Kitchen/Living/Dining (ground floor)	24.41	N/A
Bedroom 6	11.68	Yes
Bedroom 7	10.00	Yes
Bedroom 8	10.77	Yes
Bedroom 9	10.80	Yes
Laundry (first floor)	5.90	N/A
Bedroom 10	10.25	Yes
Kitchen (loft)	15.09	Yes

The proposed HMO occupancy is for a maximum of 10 people. Each room will accordingly meet and exceed the minimum standard for a single room. In addition, all bedrooms will be fitted with en-suites bathrooms, thus allowing for private bathroom facilities. Finally, all bedrooms will be served by appropriate windows with good outlook and ventilation.

The proposed shared kitchen/living spaces will comply with HMO standards and provide ample communal space for future occupiers. A dedicated laundry room will also be provided with drying facilities, further improving the quality of living. Access to the rear garden will also be provided for every future occupier.

Overall, it is considered that the proposed HMO will provide an excellent standard of accommodation that will adequately serve future occupiers.

Impact on Neighbouring Amenity

The intended use of the property will remain residential, albeit as a 10-bedroom House in Multiple Occupation (HMO), accommodating multiple households. Whilst the presence of 10 occupants from different households may result in increased activity, including comings and goings of residents and their visitors, it is anticipated that such activity will not significantly exacerbate noise disturbance or congestion beyond the existing arrangement.

With regards to the extensions, it is important to note that these elements have already been granted approval under separate applications, which provides them with a strong fall-back position. The extensions will pose limit harm towards the amenity of neighbouring occupiers.

Transport and Highways

Policy T2 of the Local Plan (2017) stated that the council will limit the availability of parking and require all new developments in the borough to be car-free. It will not issue on-street parking permits and use legal agreements to ensure that future occupants are aware they are not entitled to on-street parking permits.

The proposed development will be car-free, in accordance with Policy T2. The Applicant is happy to enter S106 agreements to restrict parking permits for future occupiers.

A total of 10 cycle parking spaces will be provided at the rear.

Conclusion

The proposed development seeks to convert the existing C3 dwelling to a 10-bed HMO, with an occupancy of up to 10 people. The proposal will provide for an appropriate alternative use of the property for which there is an identified need for. The proposed use will be appropriate given the sustainable location of the site.

The proposed HMO unit has been designed to meet the Council's HMO standards and will provide an excellent form of accommodation. It will not lead to any material impacts upon neighbouring residents, or the local highway system.

In light of the above, and in the absence of identified harm, the proposal is considered to have planning merit and should be supported by officers.

Yours sincerely,

Redwoods Projects Ltd.