



Town & Country Planning Act 1990 (As amended)

**PLANNING STATEMENT  
ON BEHALF OF THE APPLICANT**

**Mr N Raffles**

for

**Conversion of the existing building to provide 3 self-contained flats and amenity space including two terraces together with cycle and refuse storage at ground floor level, including a single storey rear extension, hip to gable roof alteration, rear dormer window, rooflights to front elevation and internal alterations**

at:

**19 Fordwych Road  
London  
NW2 3TN**

**Date: August 2022**

**Jones Town Planning Ltd**

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## **1.0 Introduction**

- 1.1 Jones Town Planning Ltd has been instructed by Mr N Raffles to prepare a planning statement in relation to the planning application submitted by Life U Design for the conversion of the existing property to provide 3 self-contained flats and amenity space including two terraces together with cycle and refuse storage at ground floor level, including a single storey rear extension, hip to gable roof alteration, rear dormer window, rooflights to front elevation and internal alterations at 19 Fordwych Road, London, NW2 3TN.
- 1.2 We are very familiar with the site, the surrounding area, the relevant planning policies related to this application and the relevance of planning policy to this site.
- 1.3 This statement sets out the relevant planning policies and assessment to support the application. It addresses the relevant planning issues and considers similar developments within the immediate area. The statement should be read in conjunction with the relevant plans and design and access statement submitted with the application.

## **2.0 Site and Surroundings**

- 2.1 The site and surroundings are described within the architect's design and access statement. However, in summary the application site comprises a three storey semi detached property. The site is located along the eastern side of Fordwych Road approximately 50m north of the junction with Maygrove Road. The site is located within an established residential area.
- 2.2 The application property benefits from a small front garden with a reasonable sized rear garden. There is no existing vehicle parking. There is permit holder parking on the road. The site is in use as a HMO.
- 2.3 The wider area generally comprises similar design and scale of properties, albeit many have been subject to change comprising alterations and extensions. However, there is a large modern brick building with a mansard roof opposite the application site, which appears to be in flat use.

2.4 There is easy access to all means of transportation facilities from the site, with Kilburn rail station a few minutes' walk. The site has a PTAL of 4 but is also in close proximity to areas with PTAL 5 and 6a on Maygrove Road

2.5 The site is not within a conservation area nor is the application building listed.

### **3.0 Planning History**

3.1 The relevant planning history is as follows:

- 15849 Conversion of 19 Fordwych Road NW2, into 3 self contained flats.  
Approved 18 April 1973

### **4.0 Planning Policy**

4.1 Both national and local planning policies have been important considerations in the preparation of the proposal and details of the relevant policies against which the application should be considered are set out below. The implications of these policies and other material considerations are addressed in this statement, which sets out our planning case.

4.2 In summary the planning framework is

- National Planning Policy Framework 2021 (NPPF)
- National Planning Practice Guidance
- London Plan 2021
- Camden Local Plan 2017
- Supplementary Planning Guidance/ Documents

#### National Planning Policy

4.3 The National Planning Policy Framework (NPPF) which sets out its objectives for securing sustainable economic growth. The policies in the NPPF are to be applied in the decision-making process from the date of publication. The current NPPF was published in July 2021

4.4 The approach to sustainable development involves making the necessary decisions to realise the vision of stimulating economic growth, maximising wellbeing and protecting our

environment, without negatively impacting on the ability of future generations to do the same.

- Para 8 Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
  - a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
  - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
  - c) an environmental objective – to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- Para 10-12 introduces the presumption in favour of sustainable development, 'which should be seen as a golden thread running through both plan-making and decision-taking.
- Para 60 -77 sets out the Government's policy in relation to providing housing and the importance to provide an adequate supply of housing to meet housing requirements. In particular para 69 recognises the importance and benefits that can be achieved by small and medium sized sites.
- Paras 107 to 113 recognises the importance of ensuring new developments are not harmful to the interests of highway safety and also sets out Government policy advice in relation to parking requirements.
- Para 105 seeks to support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.
- Paras 107 and 108 seeks to promote a flexible approach to planning requirements having regard to the area and the proposed development.
- Paras 119 -125 sets out the Government's aim to make best use of land including appropriate density of development and use of previously developed land. It supports the need to ensure an effective use of land. It encourages a flexible approach to

providing deliverable development and not safeguarding undesignated land in particular use where an alternative and acceptable form of development is more forthcoming, such as the need for houses and improvement to living environment.

- Para 126 seeks to ensure good design is a “key aspect of sustainable development”.

#### London Plan 2021

4.5 The current London Plan was issued in 2021 and we list below the relevant policies:

- GG2 Making the best use of land
- D1 London’s form, character and capacity for growth
- D4 Delivering Good Design
- D5 Inclusive design
- D6 Housing Quality and standards
- D8 Public Realm
- D14 Noise
- H1 Increasing housing supply
- H2 Housing on small sites
- H10 Housing size mix
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking

#### Camden Local Plan 2017

4.6 The following policies contained in the Local Plan 2017 are considered relevant:

- Policy H1 Maximising housing supply
- Policy H4 Maximising the supply of affordable housing
- Policy H6 Housing choice and mix
- Policy H7 Large and small homes
- Policy H10 Housing with shared facilities
- Policy A1 Managing the impact of development
- Policy A3 Biodiversity
- Policy A5 Basements
- Policy D1 Design

- Policy CC1 Climate change mitigation
- Policy CC2 Adapting to climate change
- Policy CC3 Water and flooding
- Policy CC4 Air quality
- Policy CC5 Waste
- Policy T1 Prioritising walking, cycling and public transport
- Policy T2 Parking and car-free development

4.7 In addition, the LPA have produced the following supplementary planning documents, titled Camden Planning Guidance (CPG):

- Housing – January 2021
- Design - January 2021
- Developer Contribution - March 2019

## **5.0 Planning Assessment**

### ***The Principle of Development***

5.1 The application site is located in a built up, urban and established residential area. The proposed site would therefore constitute previously development land. National Planning Policy in the NPPF encourages development on previously developed land. Paragraph 119 states,

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”

5.2 The application site is in sustainable location and as detailed previously in close proximity to public transport and also to social, employment and commercial uses. The proposed development therefore complies with these national policy objectives.

5.3 These national policies are also echoed in the London Plan Policy GG2. Camden Council also pursue the above policy requirements, within their Local Plan policies, when considering development proposals. The application meets all these objectives. In addition,

the proposal seeks to provide additional residential development within an established residential area, therefore avoiding the need for new development on more sensitive sites.

- 5.4 There is a clear national and regional policy framework to promote the efficient use of such sites. The proposed development would comply with the policy objectives and the principle of development of the site is considered to be acceptable.
- 5.5 As mentioned the site currently has a HMO use. Policy H10 “Housing with shared facilities (‘houses in multiple occupation’)” sets out the Council’s policies in relation to such uses. In particular with regard to the change of use of such properties the policy does acknowledge the following exception:  
“it can be demonstrated that the accommodation is incapable of meeting the relevant standards for houses in multiple occupation, or otherwise genuinely incapable of use as housing with shared facilities”.
- This criteria accepts that there may be a case to allow the change of use of a HMO if the current use fails to meet current standards.
- 5.6 In considering the standard of the current accommodation, we have had regard to the Council’s “HMO Standards For houses and flats with shared facilities”, dated 8 December 2020. Based on an analysis of this document, it is considered that the current uses would not meet the standards currently set by the Council. It is considered that a number of the bedrooms would not meet current standards with regard to floorspace and living accommodation requirements. Furthermore, the current property has no bathroom facilities on the ground floor and only has a shower room and two toilets (wc) on the first floor and a shower room on second floor. This would not appear to meet the needs for the users of the property, based on current standards. Likewise, there are only two kitchens and only one would be of sufficient size to constitute a kitchen / diner. There are no other communal rooms or spaces such as living rooms or dining rooms.
- 5.7 In addition, as we shall outline in due course, it is considered that the current housing delivery in the Borough is below the target and therefore the provision of 3 additional units is a positive material consideration. This, when taken alongside the existing standard of accommodation, is considered to be sufficient to justify the proposal in relation to Local plan policies.

- 5.8 The proposed development is therefore considered to comply with NPPF, London Plan and Camden Council Local Plan Policies, including Policy H10.

***Density of Development***

- 5.9 The site is in an area with a relatively high density and the site is also considered to be a sustainable location with good public transport links and easy access to social, commercial and employment facilities. The site has a PTAL rating of 4 and would suggest that a relatively high density of development would be acceptable and make appropriate use of the previously developed land. The proposed scheme optimises the development potential of the site without being harmful to other material considerations such as character of the area. As such any reduction in numbers would fail to make best use of the previously developed site and be contrary to Government and London Plan policy.

***Housing Need***

- 5.10 The London Plan recognises the Mayor's view that there is a need to increase housing supply within the London. Policy H1 sets out to achieve this and provides an indicative housing target for each Borough. In the case of Camden this is 10380 dwellings over the plan period. Furthermore, Policy H2 provides housing targets for small sites i.e. 0.25 ha and below, this would be 3280 over the plan period. Camden Local Plan Policy H1 "Maximising housing supply" seeks to maximise the supply of housing and sets a target to exceed 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.
- 5.11 The London Borough of Camden Housing Delivery Test - Action Plan August 2021 states, "In the last 4 years the number of new homes being approved has fallen below the number of new homes needed to meet our housing target" It appears that in 2020/21 there was a shortfall of 562 dwellings. It is accepted by the Council that there is a need to provide new housing in the Borough and the proposed scheme of 3 units will make a positive and valuable contribution to the housing need of the Borough.
- 5.12 Therefore, the proposed scheme complies with London Plan policies H1 and H2 and Local Plan Policy H1 to increase the housing supply in Camden.

***Affordable Housing***

- 5.13 Policy H4 Maximising the supply of affordable housing requires a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. This is also repeated in the Council's Housing SPD 2021. The London Plan policies relate to major development in line with national planning policy, however, it is noted that the Council have justified a lower threshold in their local plan. The Council's Housing SPD makes clear that on sites below 10 units payments-in-lieu of affordable housing are accepted for developments with capacity for fewer than 10 additional dwellings. As such this could be applicable to the current proposal. However, the supporting text to the local plan policy makes clear that the Council "will not seek an affordable housing contribution from developments that involve less than 100sqm of additional residential floorspace, including:
- schemes that involve the subdivision of existing housing to create more homes;"
- The current proposal does not propose an additional 100sqm of residential floorspace and therefore it is concluded that no affordable housing provision is required. The proposed development would therefore comply with policy H4 of the Camden Local Plan.

***Character and Appearance of the area***

- 5.14 National, and local planning policies make clear that new development needs to have regard to the character and appearance of the site and its surrounding areas. Whilst the proposed development is acceptable in principle it is important to ensure that the proposed scheme sits well within the existing established townscape.
- 5.15 As detailed previously the site is located in an established residential area, albeit close to commercial, social and transport facilities. The scale and form of development in the area is generally consistent but with some minor variations such as the new larger building opposite the application site.
- 5.16 The proposed development proposes a hip to gable roof alteration. It is considered that this change will not be unduly harmful to the character and appearance of the wider area or the host property. It is also considered that a hip to gable alteration could be carried out on the property , on its own, under permitted development rights. The front roofslope also includes the introduction of 3 rooflight. Indeed there have been a number of roof alterations on nearby properties which are visible from the front, and opposite the application property there is a modern flatted building with a large Mansard roof.

- 5.17 To the rear there is a proposed dormer window extension. The dormer window is located 0.5m below ridge level, 0.5m above eaves level and 0.2m and 1.5m from the side margins of the house. It is considered that the dormer extension is satisfactory in design and does not dominate the rear elevation of the host property nor is it visible from the public realm, indeed the only views would be from the properties nearby. The rear elevation of properties benefit from greater variation in design and character including roof extensions and therefore the proposed development is not considered harmful to the character and appearance of the area in this regard.
- 5.18 The proposed development includes a single storey addition (3.2m high) to the rear of the existing outrigger and also a staggered single storey extension partially infilling the gap between the existing outrigger and side boundary of the property. Materials to match existing. Therefore would be amenity space above the extensions with privacy screens/ glass balustrade on the perimeter of the extensions. The proposed extensions would be subordinate to the host property and are not a dominant feature and as such are not harmful to the character and appearance of the host property
- 5.19 It is proposed to provide additional windows in the side elevation of the property but these are not considered to provide a visually harmful appearance within the streetscene. Overall, the proposed development would have an acceptable impact on the appearance and character of the area and is considered to be consistent with the requirements of policies D1 and D4 of the London Plan and Policy D1 of the Local Plan and the SPG on Design.
- 5.20 With regard to materials and colours these have been carefully chosen to further produce a building that contributes appropriately and enhances the established character of the area. In addition, the proposed materials ensure a harmonious form of development in relation to the character and appearance of the host property.
- 5.21 Therefore, it is considered that the proposed development is not harmful to the character and appearance of the area. As such it will comply with the NPPF and London Plan policies together with policy D1 of the Local Plan and the SPD on design.

### ***Residential Mix***

- 5.22 National planning policy in the NPPF seeks to ensure that appropriate residential development is provided to meet the needs of the local circumstances.

5.23 Considering the mix of units, London Plan policy H10 also seeks to ensure that new residential development provides an appropriate mix of units. This is also reflected in Local

Plan Policy H6. The flats and their sizes are shown on the proposed plans but a summary is below

- 1 x 2 bed 3 person
- 1 x 2 bed 4 person
- 1 x 3 bed 5 person

5.24 Therefore, it is considered that the current mix optimises the development on the site. As such, the proposed scheme is considered to comply with policy H10 of the London Plan, Local Plan Policy H6 and the NPPF.

#### ***Residential Amenity***

5.25 With regard to residential amenity there are two aspects to this issue that need to be considered when proposing new development. Firstly, the protection of the residential amenity of adjoining occupiers by way of overlooking or loss of outlook. Secondly to provide a satisfactory living environment for occupiers of the new development such as adequate sunlight/daylight, flat sizes and amenity space.

Residential amenity of adjoining occupiers

5.26 With regard to the amenity of adjoining occupiers, The London Plan Policies D4 and D6 and Local Plan Policy D1 and the Council's SPD on design seek to ensure that development proposals provide a high standard of privacy and amenity for the development's neighbours.

5.27 Given the nature of the proposed scheme and the limited size of the roof extension and other alterations it is not considered that the proposed scheme would have an adverse effect upon the outlook of occupiers of the neighbouring properties.

5.28 It is noted that the proposed development provides additional habitable room windows at roof level, due to the proposed rear dormer window. However, these face the rear gardens of properties on Fordwych Road and Barlow Road. The proposed windows serve a landing area and could be obscure glazed and high level opening if required and a bedroom

window. The relationship of these windows with neighbouring properties would be comparable to the established pattern of development adjoining the site.

5.29 The proposal includes provision of balconies but again these are not considered harmful to the amenity of adjoining occupiers and could be further minimised with the provision of appropriate privacy screens.

5.30 Whilst additional units can create more activity, however, it is not considered that the proposal would lead to an unacceptable level of noise and disturbance particularly given the existing use as a HMO. It is therefore considered that the proposed development will be an improvement in this regard by providing a more compatible residential use in the area.

5.31 Therefore, it is considered that the proposed scheme would comply with the NPPF, policy D4 and D6 of the London Plan and NPPF policy and Policy D1 and Council's SPD on design.

Residential amenity of future occupiers

5.32 The proposed scheme has been designed having regard to not just Local Plan policies but also the requirements of policy D6 of the London Plan. The proposed flat sizes are

Flat	Flat Size	London Plan Standard (sq.m)	Proposed area (sq.m)
1	3B 5P	86	105
2	2B 3P	61	76
3	2B 4P	70	81

As detailed above, all the proposed flats exceed the London Plan standards. The proposed flats meet the other internal requirements of London Plan D6 as follows;

- at least one double (or twin) bedroom that is at least 2.75m wide.
- other additional double (or twin) bedroom is at least 2.55m wide.
- one bedspace single bedroom a floor area of at least 7.5 sq.m. and is at least 2.15m wide.
- two bedspace double (or twin) bedroom has at least 11.5 sq.m..

- has a minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.
- 5.33 The proposed flats benefit from a satisfactory level of daylight/sunlight and outlook and are dual aspect.
- 5.34 With regard to amenity space this is provided by balconies and the rear garden area. This is not an untypical arrangement in such an urban location. The London Plan suggests 5 sq.m per two person flat and an additional 1 sq.m per additional occupant. It is considered that the proposed scheme provides an appropriate amount of usable amenity space for occupiers of the proposed units and complies with London Plan policy D6.
- 5.35 The current proposal provides flats that comply with the London Plan policy and as such provide a satisfactory standard of accommodation. Therefore, the proposed development is considered to provide a satisfactory living environment for future occupiers of the flats and complies with the relevant national, London Plan policies, Local Plan Policy D1 and the Council's SPD on design.

#### ***Parking and Highway Issues***

- 5.36 The application does not provide off street parking, which is comparable to the existing use. The site has a high PTAL of 4 and is in close proximity to higher PTAL areas. There is permit controlled parking on street. Therefore, it is considered that the proposed development would be suitable for a car free scheme.
- 5.37 It is considered that that the proposal will not have any significant impact on the local transportation network. An appropriate level of safe and secure cycle storage and refuse storage can be provided. Therefore, complying to London Plan Policies T4, T5, T6 and T6.1 and Policies Policy CC5 Waste, Policy T1 Prioritising walking, cycling and public transport and Policy T2 Parking and car-free development.

#### **6.0 Conclusion**

- 6.1 It is considered that the principle of a residential development for three flats is acceptable. The proposed development is not harmful to the character and appearance of the wider area, neither will it be harmful to the amenity of adjoining occupiers. The proposal also

provides additional residential units to assist in meeting the LPA housing needs. It is therefore considered that the proposed scheme is acceptable and we would welcome the LPA views on the proposed scheme before submitting a formal planning application. The proposed development would be an appropriate and beneficial use of the site, complying with the development plan, London Plan and national planning policy guidance.

- 6.2 Therefore, it is contended that the proposed scheme is acceptable in planning policy terms; including meeting NPPF requirements. We would therefore suggest the application is in accordance with the development plan and in the absence of other material considerations indicating otherwise the development is acceptable.
- 6.3 Accordingly, the Council is respectfully requested to support the proposal and grant planning permission for the development.