

REF: 6004329
14 Willow Tree Lane, Hayes, UB4 9BB

Monday 13th April 2026

Dear Inspector,

This letter is submitted in response to the Local Planning Authority's Statement of Case in respect of the above appeal. It does not introduce new evidence but responds to the matters raised.

Loss of family dwelling

The LPA asserts that the property does not benefit from a lawful C4 HMO use and therefore that the proposed scheme within this appeal would result in the loss of a family dwelling. This position is incorrect and is not supported by the evidence submitted as part of this appeal. The appellant has provided clear evidence that the property has been operating as a C4 HMO since 4th August. Therefore, as has already been stated, no loss of a family unit would arise from the proposed development.

In reaching its conclusion, the LPA places reliance on a Certificate of Lawful Proposed Use granted in November, together with an email exchange in which it was suggested that certain rooms were unfurnished. However, this represents a partial and misleading interpretation of the evidence. The full email correspondence (appended to this letter) confirms that, at the time of the case officer's site visit, there was an initial assumption that the property may have been occupied. In response, the applicant provided photographs showing some rooms unfurnished, a communal living area and an office space, and one furnished bedroom which was vacant at the time of the photograph.

The appellants' sworn statement and other relevant evidence confirms that the remaining rooms within the property were occupied at that time, and the property was operating as a C4 HMO. The presence of some unfurnished rooms does not mean the lawful use of the property was not as an HMO, nor does it indicate a reversion to C3 use. The LPA's conclusion on this matter is therefore based on an incomplete understanding of the facts of the case.

Amenity of the area and character

Whilst this matter has been addressed in the appellant's previous statements, it is reiterated that, when considered in the context of the existing lawful C4 HMO use at the property, the proposed development would not materially alter the character of the area or result in any demonstrable harm to neighbouring amenity.

The appeal decisions cited by the LPA relate to materially different proposals, either involving significantly greater levels of intensification or changes from C3 dwellinghouses. As such, they are not directly comparable and carry limited weight in the determination of this appeal.

Private amenity space

The LPA's reliance on Policy DMHB 18 is misplaced, as this policy relates to new residential development rather than changes within an established HMO use. It is therefore not directly applicable in this instance. In any event, when assessed against the existing 6-bedroom HMO baseline, the level of private amenity space provision remains appropriate and proportionate to the scale and nature of the proposal.

Additionally, as outlined in the 'other matters' section of this letter below, the weight to be afforded to this policy is reduced in the context of paragraph 11(d).

Car Parking, Highway Safety and Cycle Provision

Amended drawings (PL05B and PL09B) demonstrate revisions to the front forecourt, ensuring that the driveway can accommodate two vehicles alongside appropriate provision for cycle and bin storage.

When read alongside the submitted Transport Assessment, it is clear that the proposal would not result in any adverse highway safety impacts. The site's sustainable location further supports the acceptability of the parking provision, particularly given the modest level of intensification proposed.

The LPA appears not to have taken into account the amended drawings (PL05B and PL09B), which clearly illustrate a workable and policy-compliant solution for cycle and bin storage within the front forecourt. Accordingly, the assertion that no adequate provision has been made is incorrect.

Other matters

On 7th April, the LPA confirmed that its five-year housing land supply stands at 2.5 years. As a result, paragraph 11(d) of the NPPF is engaged, and policies relating to housing delivery are considered out of date.

This engages the tilted balance, whereby significant weight should be afforded to proposals that contribute towards housing supply. The proposed development would provide additional bedspaces within a constrained London borough, thereby making a meaningful contribution in this context.

For the reasons set out above, the LPA's concerns are not substantiated and, when assessed in the context of the existing lawful use and the presumption in favour of sustainable development, the proposal is clearly acceptable. The appeal should therefore be allowed.

Yours Sincerely,

Joseph Orbell

----- Forwarded message -----

From: <studio@composition.london>

Date: Thu, 6 Nov 2025 at 10:32

Subject: RE: 5516/APP/2025/2218 - 14 Willow Tree Lane

To: <NTaplin@hillingdon.gov.uk>

Hi Nicola,

Just following up on the photos I sent you on Monday. I assume you have all you need?

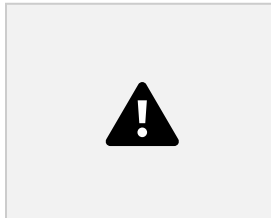
Many thanks,

Jonathan Woodcock.

For Composition Design Ltd.

020 8619 2001.

www.compositionarchitects.co.uk



From: studio@composition.london <studio@composition.london>

Sent: 03 November 2025 12:34

To: NTaplin@Hillingdon.Gov.UK

Subject: FW: 5516/APP/2025/2218 - 14 Willow Tree Lane

Dear Nicola,

Please see attached and message below.

Is this all you need?

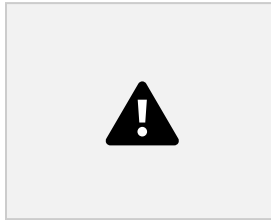
Regards,

Jonathan Woodcock.

For Composition Design Ltd.

020 8619 2001.

www.compositionarchitects.co.uk



From: Sunny Singh <sunnysingh@theksbbuildingco.com>

Sent: 1 November 2025 18:53

To: studio@composition.london

Subject: Re: 5516/APP/2025/2218 - 14 Willow Tree Lane

Hi Nicola,

The rooms are currently unfurnished. Please confirm if this is acceptable.

On Mon, 27 Oct 2025 at 15:56, <studio@composition.london> wrote:

Hi Nicola,

Ok thanks I will try to organize photos. EOT is fine.

Thanks,

Jonathan Woodcock.

For Composition Design Ltd.

020 8619 2001.

www.compositionarchitects.co.uk



From: Nicola Taplin <NTaplin@Hillingdon.Gov.UK>

Sent: 27 October 2025 15:41

To: studio@composition.london

Subject: Re: 5516/APP/2025/2218 - 14 Willow Tree Lane

Dear Jonathan

Thanks for your email. If you are able to ask the applicants to send photos this may well suffice. It may be that we need to agree to a short extension of time to enable this, perhaps until next Friday 7.11.25?

Kind regards

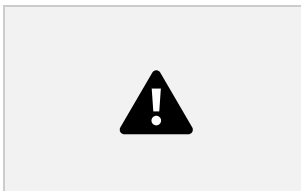
Nicola

Nicola Taplin BA (Hons) Dip TP MRTPI

**Planning Officer – Central & South
Planning and Sustainable Growth
Residents Services
Civic Centre (3N/02)
Hillingdon Council**

Tel: external: 01895 558353

Please note that the comments made in this email represent officer opinion and cannot be seen to prejudice the Local Planning Authority's formal determination in relation to any application or planning matter.



From: studio@composition.london <studio@composition.london>

Sent: Monday, October 27, 2025 15:32

To: Nicola Taplin <NTaplin@Hillingdon.Gov.UK>

Subject: RE: 5516/APP/2025/2218 - 14 Willow Tree Lane

Hi Ms Taplin,

I have been trying to get a hold of the applicant with regards to access but think he maybe away for the half term break.

Do you need access or will photos be OK?. If I can reach the applicant he maybe able to organise this.

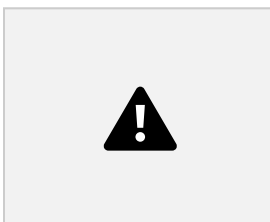
Thanks,

Jonathan Woodcock.

For Composition Design Ltd.

020 8619 2001.

www.compositionarchitects.co.uk



From: Nicola Taplin <NTaplin@Hillingdon.Gov.UK>
Sent: 27 October 2025 08:52
To: studio@composition.london
Subject: 5516/APP/2025/2218 - 14 Willow Tree Lane
Importance: High

Dear Sir

A recent site visit to the area has revealed that the property appears to be occupied and a number of vans parked both within the site and adjacent to the site. Prior to determining this application it would be necessary for me to obtain access internally to fully assess the internal layout of the property. please could you advise whether this would be possible?

I look forward to hearing from you

Kind regards

Nicola

Nicola Taplin BA (Hons) Dip TP MRTPI

**Planning Officer – Central & South
Planning and Sustainable Growth
Residents Services
Civic Centre (3N/02)
Hillingdon Council**

Tel: external: 01895 558353

Please note that the comments made in this email represent officer opinion and cannot be seen to prejudice the Local Planning Authority's formal determination in relation to any application or planning matter.



Hillingdon Council routinely monitors the content of emails sent and received via its network for the purposes of ensuring compliance with its policies and procedures. The contents of this message are for the attention and use of the intended addressee only. If you are not the intended recipient or addressee, or the person responsible for sending the message you may not copy, forward, disclose or otherwise use it or any part of it in any way. To do so may be unlawful. If you receive this email by mistake please advise the sender immediately. Where opinions are expressed they are not necessarily those of the London Borough of Hillingdon. Service by email is not accepted unless by prior agreement.

Hillingdon Council routinely monitors the content of emails sent and received via its network for the purposes of ensuring compliance with its policies and procedures. The contents of this message are for the attention and use of the intended addressee only. If you are not the intended recipient or addressee, or the person responsible for sending the message you may not copy, forward, disclose or otherwise use it or any part of it in any way. To do so may be unlawful. If you receive this email by mistake please advise the sender immediately. Where opinions are expressed they are not necessarily those of the London Borough of Hillingdon. Service by email is not accepted unless by prior agreement.