

DELEGATED DECISION

- Please select each of the categories that enables this application to be determined under delegated powers
 - Criteria 1 to 5 or criteria 7 to 9 must be addressed for all categories of application, except for applications for Certificates of Lawfulness, etc.

APPROVAL RECOMMENDED: GENERAL

Select an Option

1.	No valid planning application objection in the form of a petition of 20 or more signatures, has been received	☐
2.	Application complies with all relevant planning policies and is acceptable on planning grounds	☐
3.	There is no Committee resolution for the enforcement action	☐
4.	There is no effect on listed buildings or their settings	☐
5.	The site is not in the Green Belt (but see 11 below)	☐

REFUSAL RECOMMENDED: GENERAL

6.	Application is contrary to relevant planning policies/standards	☐
7.	No petition of 20 or more signatures has been received	☐
8.	Application has not been supported independently by a person/s	☐
9.	The site is not in Green Belt (but see 11 below)	☐

RESIDENTIAL DEVELOPMENT

10.	Single dwelling or less than 10 dwelling units and/or a site of less than 0.5 ha	☐
11.	Householder application in the Green Belt	☐

COMMERCIAL, INDUSTRIAL AND RETAIL DEVELOPMENT

12.	Change of use of retail units on site less than 1 ha or with less than 1000 sq. m other than a change involving a loss of A1 uses	☐
13.	Refusal of change of use from retail class A1 to any other use	☐
14.	Change of use of industrial units on site less than 1 ha or with less than 1000sq.m. of floor space other than to a retail use.	☐

CERTIFICATE OF LAWFULNESS

15.	Certificate of Lawfulness (for proposed use or Development)	☐
16.	Certificate of Lawfulness (for existing use or Development)	☐
17.	Certificate of Appropriate Alternative Development	☐

CERTIFICATE OF LAWFULNESS

18.	ADVERTISMENT CONSENT (excluding Hoardings)	☐
19.	PRIOR APPROVAL APPLICATION	☐
20.	OUT-OF-BOROUGH OBSERVATIONS	☐
21.	CIRCULAR 18/84 APPLICATION	☐
22.	CORPSEWOOD COVENANT APPLICATION	☐
23.	APPROVAL OF DETAILS	☐
24.	ANCILLARY PLANNING AGREEMENT (S.106 or S.278) where the Heads of Terms have already received Committee approval	☐
25.	WORKS TO TREES	☐
26.	OTHER (please specify)	☐

The delegation powers schedule has been changed. Interim Director of Planning, Regeneration & Public Realm can determine this application

Case Officer:

Signature:

Date:

A delegated decision is appropriate and the recommendation, conditions/reasons for refusal and informative's are satisfactory.

Team Manager:

Signature:

Date:

The decision notice for this application can be issued.

Director / Member of Senior Management Team:

Signature:

Date:

NONE OF THE ABOVE DETAILS SHOULD BE USED IN THE PS2 RETURNS ODPM

Item No. **Report of the Head of Development Management and Building Control**

Address: 14 WILLOW TREE LANE HAYES

Development: Change of use from Class C3 dwelling house to 7-bedroom / maximum 8 person HMO Use Class Sui Generis

LBH Ref Nos: 5516/APP/2025/2441

Drawing Nos: HD00257 - PL06
 HD00257 - PL05
 HD00257 - PL07
 HD00257 - PL08
 HD00257 - PL09
 Design and Access Statement
 HD00257 - PL01
 HD00257 - PL02
 HD00257 - PL04
 Noise Impact Assessment, 28th October 2025, Dice Environmental Acoustics
 Transport Assessment, October 27, 2025, Nene Valley Transport Planning
 Parking Survey Report, October 24, 2025, Nene Valley Transport Planning

Date Plans received: 19-09-25 **Date(s) of Amendments(s):**

Date Application valid 19-09-25

1. SUMMARY

The application seeks planning permission for the change of use from C3 dwelling house to a 7 bedroom / maximum 8 person HMO Use Class Sui Generis and follows the refusal of planning application reference 5516/APP/2025/1725 for a similar scheme albeit with 8 people proposed to occupy 8 bedrooms.

In determining this case Officers have given weight to the findings of the appeal decision as well as key development plan policies. Whilst it is agreed that Houses of Multiple Occupancy provide a type of residential accommodation which if meeting the appropriate standards, can contribute towards housing stock, this should not be to detriment of existing family sized housing stock for which there is an identified need for. As such the Council will seek to safeguard existing family sized units and increase the level of provision to help meet demand. Furthermore the application presents a clear overdevelopment and over intensification of the site resulting in a poor standard of living accommodation for future occupants.

Setting aside the principle of development and standards of living accommodation concerns, Officers consider that the application would prejudice highway safety and harm residential

neighbouring amenity. As such refusal is recommended.

2. RECOMMENDATION

REFUSAL for the following reasons:

1. NON2 Principle

The development, by virtue of the loss of the existing family dwelling, would conflict with the Borough's strategic housing goal of safeguarding 3-bedroom family dwellings. Consequently, the principle of development is considered to be unacceptable. The proposal is therefore contrary to Policies DMH 1 and DMH 5 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

2. NON2 Amenity of the area

The applicant has failed to demonstrate that the proposal and the high number of potential occupants, would not result in noise and general disturbance to neighbouring properties alongside a harmful over intensification of the use of the site, detrimental to both the occupiers and neighbouring properties and the character and appearance of the area, all contrary to the requirements of Policies DMH 5 and DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and paragraph 135 f) of the NPPF (2024).

3. NON2 Living conditions

The proposal, by virtue of it's failure to maintain an adequate amount of private usable external amenity space and adequate levels of outlook for the occupiers of the proposed development, would result in substandard living accommodation and an over-development of the site to the detriment of the residential amenity of existing and future occupiers. The proposal is therefore contrary to the requirements of Policies DMH 5, DMHB 11, DMHB 16 and DMHB 18 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and paragraph 135 f) of the NPPF (2024).

4. NON2 Car parking

The applicant has failed to demonstrate that the proposal would provide an adequate quantum of off-street parking space and that those spaces proposed would be functional and capable of safe and independent access. The proposed parking provision is likely to result in roadside parking and create a more hazardous environment for road users, whilst also causing traffic build up and congestion as vehicles try to maneuver to enter and exit the site and stop to pass parked vehicles. The proposed development is therefore considered to be detrimental to pedestrian and highway safety, as well as the free movement of vehicles on the local highways network. The proposed development is therefore considered to be contrary to Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), as well as Policies T4 and T6 of the London Plan (2021) and paragraph 116 of the NPPF (2024).

5. NON2 Cycle parking

The proposal fails to provide an adequate quantum of cycle parking spaces that would be easily accessible, in accordance with cycle parking standards and therefore fails to comply with Policy DMT 5 of the Hillingdon Local Plan (2020): Part Two - Development Management Policies (2020), Policy T5 of the London Plan (2021), the London Cycling Design Standards and LTN 1/20 Cycle

INFORMATIVES

1. I52 Compulsory Informative (1)

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance.

DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 16	Housing Standards
DMHB 18	Private Outdoor Amenity Space
DMHD 1	Alterations and Extensions to Residential Dwellings
DMH 1	Safeguarding Existing Housing
DMH 5	Houses in Multiple Occupation
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
DMEI 9	Management of Flood Risk
DMEI 10	Water Management, Efficiency and Quality
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D6	(2021) Housing quality and standards

LPP D7	(2021) Accessible housing
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T6.1	(2021) Residential parking
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes

3. CONSIDERATIONS

3.1 Site and Locality

The application property comprises of a semi-detached property which has been extended located on the southern side of Willow Tree Lane in Hayes close to the junction of Yeading Lane. The surrounding area is residential in nature and dwellings within this area are predominantly of uniform design / appearance and either semi-detached or terraced in form. Closer to the junction of Yeading Lane some retail units exist. The application dwelling is finished in render and painted brick has a tiled roof. The application property benefits from a front hardstanding garden, providing off street parking. To the rear is a moderately sized private garden.

3.2 Proposed Scheme

Planning permission is sought for the Change of use from Class C3 dwelling house to 7-bedroom / maximum 8 person HMO Use Class Sui Generis.

3.3 Relevant Planning History

5516/APP/2025/2218 14 WILLOW TREE LANE HAYES

Change of use from a Dwellinghouse (Class C3) to a House in Multiple Occupation (Class C4) (Application for a Certificate of Lawful Development for a Proposed Use).

Decision: 05-11-2025 Approval

5516/APP/2025/1725 14 WILLOW TREE LANE HAYES

Change of use from C3 dwelling house to 8 bedroom / maximum 8 person HMO Use Class Sui Generis

Decision: 18-08-2025 Refusal

5516/APP/2025/686 14 WILLOW TREE LANE HAYES

Change of use from Class C3 (Dwelling) to an 8 bedroom Sui Generis (Large HMO).

Decision: 28-05-2025 Refusal

5516/APP/2025/3 14 WILLOW TREE LANE HAYES

Erection of a first floor side extension over existing garage. Conversion of integral garage to habitable accommodation and amendments to fenestration.

Decision: 04-03-2025 Approval

5516/K/96/0852 14 WILLOW TREE LANE HAYES

Erection of a first floor side extension

Decision: 15-07-1996 Refusal

5516/J/89/0980 14 WILLOW TREE LANE HAYES

Erection of a single storey rear extension

Decision: 15-06-1989 Approval

5516/C/XX/13127

5516/D/XX/14018

Comment on Planning History

The relevant planning history is listed below.

4. Advertisement and Site Notice

4.1 Advertisement Expiry Date: Not applicable

4.2 Site Notice Expiry Date: Not applicable

5. Comments on Public Consult

PUBLIC CONSULTATION

17 neighbours and Willow Tree Lane Area Residents Association were consulted on 24-09-25. 2 letters of objection were received citing concerns regarding the increased number of comings and goings, noise, nuisance and anti-social behaviour, a HMO being out of character in an area comprised of family homes, impact on property values parking, strain on local infrastructure and previous refusals of similar applications.

OFFICER COMMENTS

The matters raised by residents are noted and discussed in the main body of the report, except for property values and local infrastructure which are not a material planning considerations.

LBH CONSULTEES

- Access

This application has been evaluated in accordance with the requirements of the 2021 London Plan policy D7. Given that the existing dwelling was constructed before the implementation of accessible housing standards, the aforementioned policy does not apply to the proposed conversion from a dwelling-house (C3) to a House in Multiple Occupation (HMO) (C4). There would be no loss of accessible housing stock as a result of this proposed Change of Use, if approved. Conclusion: no objections raised from an accessibility perspective.

- Highways (revised)

In response to the Highway Authority (HA) comments dated 16 October, the applicant has submitted a revised Transport Statement (TS) and a Parking survey report dated 24 October.

The HA has reviewed both documents and has the following comments to make:

A parking survey was undertaken to assess local parking conditions using the Lambeth Methodology, covering all streets within a 200-metre radius of the site during the following time slots: 08:00-10:00, 12:00-14:00, 16:00-18:00, 20:00-22:00, and 00:30-02:30, with parking capacity calculated using usable length of road this has then been divided by 5m to approximate the number of potential parking spaces.

The TS states that the results of the survey found an average parking stress of 62%, spare capacity was observed, confirming that there is sufficient on-street parking availability to accommodate any additional demand arising from the proposed HMO.

Parking stress is not confined to early mornings or residents alone. In areas with a mix of residential, commercial, and transport hubs, it becomes a significant concern during the day, affecting residents, visitors, shoppers, and commuters. Survey results indicate that during the morning, afternoon, and evening peak periods, parking occupancy reaches 80-100% capacity, particularly along Willow Tree Lane, Masfield Lane, and Yeading Lane (where current restrictions are not being enforced). However, the Highway Authority acknowledges that, based on the survey, there is spare capacity within 200 meters of the site to accommodate any overspill.

While the London Plan (2021) does not specify parking standards for HMO uses, the London Borough of Hillingdon (LBH) Local Plan Part 2: Development Management Policies (Appendix C: Parking Standards) requires 1 parking space per 2 occupants, up to 6 occupants, this equates to a requirement of 3 parking spaces for the proposed development. For HMOs over 6 occupants, car parking requirements should be assessed through a transport appraisal and travel plan. Also, minimum cycle parking of 1 per occupant is required.

Given the development proposes two on-site car parking spaces, secure cycle storage for 8 cycles, and the site has a PTAL rating of 2, indicating low public transport accessibility; however, sustainable travel options are supported by the presence of a bus stop adjacent to the site and additional stops approximately 150m away. This connectivity promotes active travel and reduces reliance on private vehicles.

The TS also states that the proposed HMO includes two off-street parking spaces, each equipped with an Electric Vehicle Charging Point (EVCP), and eight secure cycle parking spaces in accordance with the London Plan. Waste storage and collection have been designed to operate efficiently without impeding pedestrian access.

Whilst the HA accepts the provisions outlined in the TS, the proposed forecourt layout remains extremely constrained. It attempts to accommodate two car parking spaces, sheltered bicycle storage for eight cycles, and refuse bins within a limited area. Swept path analysis indicates minimal tolerance for vehicle movements, particularly when entering the forecourt, which will require reversing and could involve multiple manoeuvres. This poses a risk of obstructing traffic along Willow Tree Lane, especially buses near a busy junction.

Current guidance requires a minimum of 6 metres of clear space in front of parking bays; however, the proposed layout does not provide sufficient clearance for vehicles to enter in forward gear. Consequently, vehicles may need to reverse repeatedly to access bays, creating potential hazards for pedestrians and causing delays to traffic, particularly buses.

Furthermore, the TS does not include dimensions on the submitted plans to demonstrate compliance with key standards, such as parking bay sizes, 6m clearance, and pedestrian path widths, despite previous HA requests.

Cycle parking must be covered, secure, and easily accessible in accordance with the London Cycling Design Standards (LCDS) and the London Plan. The current proposal fails to meet these requirements.

Conclusion

The proposed forecourt layout is considered unacceptable. It fails to provide adequate space for safe and efficient vehicle manoeuvring, does not comply with minimum clearance requirements, and poses a risk of obstruction to traffic and pedestrians. The lack of detailed dimensions and non-compliance with established standards for parking, access, and cycle storage further reinforces that the design is unsuitable. Without significant revisions to address these issues, the layout cannot be supported by the HA.

Recommendation:

Until the above issue has been satisfactorily addressed, the HA is not in a position to determine the suitability or otherwise of the development to make an informed decision on the proposal's suitability, impact and safety.

The HA maintains its objection to the proposed development for the following reasons:

- Unacceptable impact on highway safety
- Absence of clearly defined, policy-compliant car parking layout and cycle storage
- Potential obstruction and delay to public transport services

Consequently, the proposal fails to demonstrate compliance with:

Policy DMT6 of the Hillingdon Local Plan
Policy T6 of the London Plan
London Cycling Design Standards (LCDS)

6. Local Plan Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

PT1.BE1 (2012) Built Environment

Part 2 Policies:

DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 16	Housing Standards
DMHB 18	Private Outdoor Amenity Space
DMHD 1	Alterations and Extensions to Residential Dwellings
DMH 1	Safeguarding Existing Housing
DMH 5	Houses in Multiple Occupation
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
DMEI 9	Management of Flood Risk
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LPP D3	(2021) Optimising site capacity through the design-led approach
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LPP D7	(2021) Accessible housing
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
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LPP T6.1	(2021) Residential parking
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LPP D14	(2021) Noise
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes

In addition: Development Plan:

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations

indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)
The Local Plan: Part 2 - Development Management Policies (2020)
The Local Plan: Part 2 - Site Allocations and Designations (2020)
The West London Waste Plan (2015)
The London Plan (2021)

Material Considerations:

The National Planning Policy Framework (NPPF) (2024) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

7. MAIN PLANNING ISSUES

7.1 Impact on the amenities of the occupiers of neighbouring residential properties

NEIGHBOUR AMENITY

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) seeks to ensure that development proposals do not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space. This is supported by Policy DMH 5 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) which requires HMOs to not have a detrimental impact upon the residential amenity of adjoining properties.

Paragraph 135 (f) of the NPPF (2024) states Planning policies and decisions should ensure that developments: create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

The proposed development includes no changes to the bulk, size, height or position of the existing building, which has been recently extended inline with approved application No.5516/APP/2025/3.

No external changes are proposed to its fenestrations. the proposed front boundary alterations would cause no harm to neighbouring amenities, due to their siting and nature. As such the proposal is unlikely to cause any additional overlooking views, loss of light or loss of privacy to neighbouring dwellings.

Notwithstanding the above, the proposed development comprises the following internal accommodation requiring internal alterations.

Ground Floor

Bedroom 1: 11.5m²

Bedroom 2: 12.2m² (double occupancy)

Bedroom 3: 10 m²

Kitchen/dining and living area: 41.5sq.m

First Floor

Bedroom 4: 11.5m²

Bedroom 5: 10m²

Bedroom 6: 12.7m²

Bedroom 7: 9.8m²

The bedrooms are all en-suites. Whilst only one of the bedrooms is denoted as being intended for double occupancy, four of the bedrooms would qualify as double rooms due to being over 11.5sq.m in size

The proposed development could result in 11 people living at the site on a permanent basis (as 4/7 rooms are double rooms). Notwithstanding the application form describing a maximum 8 person HMO, it is considered that 8-11 people moving in and out of the site, on a regular basis, by foot, car or bicycle would cause a significant increase in activity at the site to the detriment of neighbouring amenities. The likelihood of nuisance and disturbance to neighbours amenities would also be increased by the over intensification of the sites use. Use of the sites garden space for such a high number of people, alongside potential visitors, would generate noise over and above that of the existing family house, such noise would be detrimental to all of the sites adjoining neighbours.

Taking into consideration these points the proposal is considered to cause harm to the amenities of Nos. 12 and 16 Willow Tree Lane through over intensification of the sites use, excessive movements of people, as well as the generation of unacceptable noise and general disturbance through an over-intensification of occupiers on site.

It is noted that the existing single family dwellinghouse has 3 bedrooms and other rooms which could be converted into bedrooms, however its users would be part of one family, resulting in fewer movements in and out of the site, as well as potential visitors to the site when compared with use of the building as a HMO with between 8-11 individual occupiers. The size of the existing house is therefore not considered to justify the proposed development and its impact on neighbours.

Officers acknowledge that the property could be occupied by up to 6 persons (C4) as permitted development as per the recent certificate of lawfulness approval ref: 5516/APP/2025/2218. However the conversion from a small HMO to a larger scale HMO by adding an additional 2-5 persons would be considered unacceptable in terms of its impact on residential amenities of neighbouring occupiers.

A recent appeal for a change of use to a C4 HMO in Hayes was considered by an appeal Inspector under appeal reference APP/R5510/W/25/3360554 in respect of planning application reference 20650/APP/2024/1895. The appeal Inspector advised that: "The use of the building at number 5 Crossway as a House in Multiple Occupation would be very likely to amount to a more intensive use than use as a family dwellinghouse (or a dwelling occupied by not more than six residents living together as a single household), because of the potential numbers involved and the different movement patterns of people living independent lives. This more intensive use would be likely to generate greater levels of disturbance for neighbours and I am persuaded that the change for which planning permission is sought would amount to an over-intensification of development on the site that would also harm the character of the area."

Whilst officers acknowledge that the application property at 14 Willow Tree Lane could be occupied as a C4 dwellinghouse without the need for planning permission, the above appeal decision highlights the likely harm caused by the intensification of use as a C4 HMO. Given that the

application proposal could allow for an additional 2-5 residents over the permitted development fallback position, officers maintain the objection in terms of undue noise and general disturbance to neighbouring residents, particularly as a result of a marked increase in comings and goings, use of the rear garden and the lack of information relating to sound insulation. The proposal would therefore be contrary to the requirements of Policies DMH 5 and DMHB 16 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and paragraph 135 (f) of the NPPF (2024).

7.2 Impact on Street Scene

CHARACTER AND APPEARANCE

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that new development should harmonise with the character and appearance of the existing street scene and surrounding area, and the scale, form, architectural composition and proportions of the original building.

Policy DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that development should be well integrated with the surrounding area and accessible.

Paragraph 135 of the NPPF (2024) states Planning policies and decisions should ensure that developments::

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.

Other than minor alterations to the site (bin and cycle storage) , the proposed development includes no changes to the bulk, size, fenestration detailing, height or position of the existing building, which other than its material finish, has been approved under application 5516/APP/2025/3.

The area surrounding the site is residential and a HMO is a form of residential use. The proposal is therefore not considered to be out of character enough to warrant refusal of the application. Bins would be located within a fenced enclosure, for which the design details could be secured via condition, to ensure they cause no harm to the visual amenities of the area. Cycle stores could be located to the rear of the site where they would cause no harm to the appearance of the area. Taking into consideration these points the proposal is considered to have an acceptable impact on the character and appearance of the area.

7.3 Traffic Impact/Pedestrian Safety

PARKING AND HIGHWAY SAFETY:

Paragraph 116 of the NPPF states - Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Paragraph 117 of the NPPF continues by stating - Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with

neighbouring areas; and second - so far as possible - to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive - which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Policy T2 Part A of the London Plan (2021) states - Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.

Policy T4 Parts E and F of the London Plan (2021) states - E) The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated; and, F) Development proposals should not increase road danger.

Policy T6 Part D of the London Plan (2021) states - The maximum car parking standards set out in Policy T6 .1 Residential parking to Policy T6.5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.

Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) require the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

Policy DMT 5 Part A of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states - Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network.

Policy DMT 6 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) seeks to ensure that all development is in accordance with the car parking standards set out in Appendix C, Table 1 unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.

The proposal seeks permission to convert an existing 3 bedroom family sized dwelling to a 7bed/8 person HMO. The existing property benefits from hardstanding to the front of the property which could accommodate approximately 2 vehicles comfortably. The London Plan maximum standards state that 1.5 spaces is adequate to serve a 3 bed dwelling and whilst the existing layout would permit at least 2 this is seen as broadly required for a family residing in a 3 bed dwelling. As explained above, a recent appeal decision confirmed that an existing family sized dwelling is unlikely to accommodate the same number of adult individuals who could all have access to a car therefore increasing the car parking demand significantly. With regards to this proposal, the 3 bed family unit would increase to 7 bedrooms and potentially 8 adults who in the eyes of the recent appeal decision, could benefit from access to a car. Based on this the level of parking demand would be significantly increased, far above that of the existing scenario on site.

A parking survey was undertaken in accordance with the Lambeth Methodology and found an

average parking stress of 62%, spare capacity was observed. However in areas with a mix of residential, commercial, and transport hubs, it becomes a significant concern during the day, affecting residents, visitors, shoppers, and commuters. Survey results indicate that during the morning, afternoon, and evening peak periods, parking occupancy reaches 80-100% capacity, particularly along Willow Tree Lane, Masfield Lane, and Yeading Lane (where current restrictions are not being enforced). Whilst the TA does state there to be spare capacity within 200 metres of the site, it is questionable whether it is reasonable to expect individuals to walk a significant distance such as 200 metres from their home to park their vehicle and in fact whether having to do so is an indication of parking stress.

As detailed in Section 5 of this report, the application has generated an objection from the Highway Authority on the grounds of inadequate quantum of safe and accessible off-street car parking spaces and cycle parking spaces. The development would not be served by an acceptable level of car parking and pedestrian and cycle access. The development, as a result of the car parking provision and layout, is likely to prejudice highway safety and exacerbate the demand for on-street parking.

Moreover the proposal illustrates that there to be 2 spaces to be provided at the front of the site. These are heavily compromised by the proposed location of the cycle store which in accordance with the London Plan should provide 8 secured and covered cycle spaces. Swept path lines are illustrated on the site plan but clearly there would be a potential conflict between the vehicles entering and existing the site with the cycle store and bin store.

Whilst the HA accepts the provisions outlined in the TS, the proposed forecourt layout remains extremely constrained. It attempts to accommodate two car parking spaces, sheltered bicycle storage for eight cycles, and refuse bins within a limited area. Swept path analysis indicates minimal tolerance for vehicle movements, particularly when entering the forecourt, which will require reversing and could involve multiple manoeuvres. This poses a risk of obstructing traffic along Willow Tree Lane, especially buses near a busy junction. Furthermore current guidance requires a minimum of 6 metres of clear space in front of parking bays; however, the proposed layout does not provide sufficient clearance for vehicles to enter in forward gear. Consequently, vehicles may need to reverse repeatedly to access bays, creating potential hazards for pedestrians and causing delays to traffic, particularly buses.

Furthermore, the TS does not include dimensions on the submitted plans to demonstrate compliance with key standards, such as parking bay sizes, 6m clearance, and pedestrian path widths, despite previous HA requests.

The development is therefore contrary to Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policies T2, T4, T6 and T6.1 of the London Plan (2021) and Paragraphs 116 and 117 of the NPPF (2024).

7.4 Carparking & Layout

See 'Traffic Impact/Pedestrian Safety' section.

7.5 Urban Design, Access and Security Considerations

LIVING CONDITIONS FOR FUTURE OCCUPIERS:

INTERNAL AMENITY SPACE:

Policy DMH 5 of the Hillingdon Local Plan - Part 2: Development Management Policies (2020) allows large HMOs only where there are satisfactory living conditions for occupiers.

Policy D6 of the London Plan (2021) and Policies DMHB 11 and DMHB 16 of the Hillingdon Local Plan - Part 2: Development Management Policies (2020) require a high standard of design with minimum internal space standards.

Policy D6 of the London Plan (2021) sets out the minimum internal floor space standards required for residential developments in order to ensure that there is an adequate level of amenity for future occupants.

Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment.

The proposed Large HMO would comprise of a total of 7 bedrooms and a communal kitchen/dining/living area. Each bedroom would also benefit from a private ensuite bathroom. The habitable rooms would have internal floor space as follows:

Ground Floor

Bedroom 1: 11.5m²

Bedroom 2: 12.2m² (double occupancy)

Bedroom 3: 10 m²

Kitchen/dining and living area: 41.5sq.m

First Floor

Bedroom 4: 11.5m²

Bedroom 5: 10m²

Bedroom 6: 12.7m²

Bedroom 7: 9.8m²

Given the size of the bedrooms and the number of double occupancy rooms, there is potential for the property to be used as a Large HMO by up to 11 occupants and there is one communal kitchen/dining/living space.

A recent planning appeal decision (Ref APP/R5510/W/23/3327485 -131 York Avenue) for a conversion of small HMO to large scale HMO was dismissed on several grounds including the overall standards of accommodation. The Inspectorate commented within this decision that whilst the D6 London Plan standards and table 3.1 do not apply to HMO's the overall objective of the policy to provide high quality, adequately sized residential accommodation does.

The Inspectorate goes on to state in Para 13 "Reliance is placed on the licensing requirement for a HMO to ensure that the residential accommodation is safe, well managed and of a good quality, including the size of rooms and garden space. However, this does not necessarily mean that the accommodation is acceptable in planning terms. Licensing is primarily a means of securing minimum standards whereas the planning system has wider responsibilities from ensuring that the quality of accommodation provides a good living environment from occupants throughout the lifetime of the development" (Ref APP/R5510/W/23/3327485 -131 York Avenue)

The communal facilities provided within the building are on balance considered to be sufficient for use by the potential occupiers.

Concerns were previously raised in the consideration of application reference 5516/APP/2025/686 with regards to the privacy of Bedrooms 1 and 2 which are located on the ground floor given the only outlook from the windows would be directly facing the front driveway and would be overlooked

by other occupiers and visitors to the accommodation. This current proposal seeks to address this concern and the submitted plans indicate a barrier / buffer zone has now been added to the design in front of each bedroom window in the form of a planter filled with planting which would stop a person directly approaching right up to the window. Officers consider this to be a satisfactory solution.

It is however noted that the ground floor window serving 'Bedroom 3' on the ground floor side elevation would face directly onto the boundary treatment at close proximity. The occupiers of this room not be provided with adequate levels of outlook and daylight due to the obscure glazing that would be required for the lifetime of the development. This is considered to warrant a separate reason for refusal.

EXTERNAL AMENITY SPACE

Policy DMHB 18 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) requires all new residential development to provide good quality and useable private amenity space. As a guide, Table 5.3 requires studios and 1 bedroom flats to have at least 20 square metres of private outdoor amenity space. A 4+ bedroom dwellinghouse would be required to provide at least 100sq.m metres of private amenity space.

Whilst there is no prescribed standard for HMOs in Policy DMHB18, the garden area is extremely modest (43m²) and is likely to be further reduced if secure cycle or bin storage is provided in this area. This further reinforces the substandard living conditions which would be enjoyed by future occupants of the proposed HMO. One of the points which is often raised by Applicants to justify why the conversion of a property to a HMO should be considered acceptable is that the development would not give rise to harm significantly above that derived by a single family dwellinghouse. If this is the case then the development should provide the same standards of living accommodation that a single family dwellinghouse should provide. If a C3 dwelling proposes to increase the number of bedrooms at a property then it would be expected to conform with the amenity space standards within DMHB 18, for a property of 4 or more bedrooms 100sqm should be provided. The property has been significantly extended, some of the extensions have been constructed in accordance with the GPDO where there is no set standard for the provision of amenity space. Notably the existing plans indicate that the dwelling accommodates 3 bedrooms therefore the level of amenity space to be provided should be 60sqm. The existing site plan illustrates 47 sqm to the rear which falls short of the standard but not significantly. However clearly the proposal to convert the property to a 7 bed HMO would be a significant increase in bedrooms and would warrant the provision of 100sqm of amenity space. The proposal retains 47sqm only which is less than half of that which should be provided and presents a significant shortfall. As such Officers consider that the proposal amounts to an over intensification of the residential use of the site and would fail to provide adequate levels of living accommodation for future occupants.

It is therefore considered that the proposals would conflict with Policy DMHB 18 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

WASTE AND RECYCLING:

Full details of the design and the dimensions of the fenced bin stores would be secured by condition, had the application been recommended for approval. it is considered that the proposal could provide appropriate refuse and recycling facilities.

7.6 Other Issues

PRINCIPLE OF DEVELOPMENT

Policy DMH 1 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states:

- A) The net loss of existing self-contained housing, including affordable housing, will be resisted unless the housing is replaced with at least equivalent residential floorspace.
- B) The Council will grant planning permission for the subdivision of dwellings only if:
 - i) car parking standards can be met within the curtilage of the site without being detrimental to the street scene;
 - ii) all units are self contained with exclusive use of sanitary and kitchen facilities and provided with individual entrances and internal staircases to serve units above ground floor level;
 - iii) adequate amenity space is provided for the benefit of residents; and iv) adequate living space standards are met.

The supporting Paragraph for Policy DMH 2 (Housing Mix) of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states: 'The Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly three bedroom properties'.

The application site does not lie within the area of the borough that is subject to a direction made under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended (Article 4 Direction) (GPDO) which came into force on 24th March 2013 to remove permitted development rights relating to making a change of use of a dwelling house (Class C3) into an HMO (Class C4). Nevertheless, this proposal requires planning permission as a large HMO is proposed.

Policy DMH 5 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that:

- A) In all parts of the Borough Proposals for the provision of large HMOs, residential hostels, student accommodation and secure accommodation will be required to demonstrate that:
 - i) there is good accessibility to local amenities and public transport;
 - ii) they accord with the Accessible Homes standards and provide satisfactory living conditions for the intended occupiers; and
 - iii) there will be no adverse impact on the amenity of neighbouring properties or the character of the area.

Whilst the development would not constitute an over-concentration of HMO uses in the area, the development would result in the loss of the 3 bedroom family home, which conflicts with the Borough's strategic housing goal of safeguarding and provided family dwellings.

In addition, as discussed in the 'Traffic Impact/Pedestrian Safety', 'Urban Design/Access & Security' and 'Impact on Neighbours' sections above, the HMO would provide poor living conditions for future occupiers and give rise to neighbour amenity and highway safety issues. Given the above, the principle of development is considered to be unacceptable, The development therefore conflicts with Policies DMH 1 and DMH 5 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020). The principle of development for a large HMO at this location is therefore considered to be unacceptable.

8. Reference Documents

Hillingdon Local Plan: Part One - Strategic Policies (November 2012)
Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)
Hillingdon's Local Plan Part 2 Site Allocations and Designations (2020)

Hillingdon Design and Accessibility Statement: Accessible Hillingdon (2017)
The London Plan (2021)
National Planning Policy Framework (2024)

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