



Town and Country Planning Act 1990
Section 78 Planning Appeal

London Borough of Hillingdon Appeal Statement

Appeal By:
P Philippou

Proposal:
Change of use from dwellinghouse (Class C3) to small House in Multiple Occupation (Class C4), including conversion of garage space to habitable space and amendments to fenestration

Appeal Site:
11 Woodville Gardens, Ruislip

Our Ref:
Your Ref:

75895/APP/2026/164
6013779

1. Introduction

- 1.1 This appeal statement is submitted by the London Borough of Hillingdon, as the Local Planning Authority (LPA), in respect of the appeal against its refusal to grant planning application reference 75895/APP/2026/164, for the change of use from dwellinghouse (Class C3) to small House in Multiple Occupation (Class C4), including conversion of garage space to habitable space and amendments to fenestration at 11 Woodville Gardens, Ruislip.
- 1.2 The LPA refused planning permission on 8 June 2026 for the following reasons (as stated on the decision notice):
 - 1.2.1 *The proposed development would provide a substandard and unsatisfactory internal living environment for future occupiers by reason of the limited and inadequate communal accommodation proposed, including the absence of sufficient internal communal living or recreational space. The proposal would therefore fail to provide a comfortable, functional and fit-for-purpose living environment for future occupiers, contrary to Policies D3 and D6 of the London Plan (2021), and Policies DMH 5 and DMHB 16 of the Hillingdon Local Plan Part Two (2020).*
 - 1.2.2 *The proposed change of use from a dwellinghouse (Use Class C3) to a four-bedroom House in Multiple Occupation (Use Class C4) would result in an over-intensive form of occupation that would materially increase levels of activity, comings and goings, noise and disturbance, to the detriment of the amenities of neighbouring occupiers and the established residential character of the area. The proposal would therefore be contrary to Policy EM8 of the Hillingdon Local Plan Part One (2012), Policies DMH 5, DMHB 11 and DMHD 1 of the Hillingdon Local Plan Part Two (2020), Policies D3 and D14 of the London Plan (2021), and paragraph 135(f) of the National Planning Policy Framework (2024).*
 - 1.2.3 *The intensified nature of the proposed House in Multiple Occupation use, including the increased residential and servicing activity associated with occupation by multiple unrelated individuals, would be out of keeping with the established character of the area, which is predominantly characterised by single family occupation. The proposal would therefore be contrary to Policy BE1 of the Hillingdon Local Plan Part One (2012), Policies DMHB 11 and DMHD 1 of the Hillingdon Local Plan Part Two (2020), and Policies D3 and D4 of the London Plan (2021).*
- 1.3 Since determination of the application, a revised National Planning Policy Framework was published on 17 August 2026, replacing the December 2024 Framework. The Council has had regard to the revised Framework in preparing this appeal statement. The revised Framework does not materially alter the Council's assessment of the principal issues in this appeal. The Council's case remains principally founded upon the adopted Development Plan, including Policies DMH 5, DMHB 11 and DMHB 16 of the Hillingdon Local Plan Part Two and Policies D3, D6 and D14 of the London Plan.

- 1.4 The LPA's case is set out in the Planning Officer's delegated report, which should be read in conjunction with this statement. Appendix 4 contains a list of recommended conditions, should the inspector be minded to allow this appeal.
- 1.5 This statement will not repeat the delegated report and will focus on addressing matters raised in the Appellant's statement of case.

2. LPA Comments on Appellant's Statement of Case

2.1 Within their statement of case the appellant has raised the following summarised points:

- There is no objective evidence that the proposal would exceed the numerical HMO concentration thresholds in Policy DMH 5. The Council's uncertainty over the number of existing HMOs should not be treated as evidence of policy conflict.
- The Article 4 Direction simply removes permitted development rights and does not create a presumption against HMOs; applications must still be assessed on their individual merits.
- A four-person HMO is said to be comparable in occupancy terms to a typical C3 family dwelling and would not necessarily result in greater activity.
- The Council has provided insufficient site-specific evidence that four unrelated occupants would generate materially greater noise, movements, visitors, deliveries, waste or disturbance than a C3 household.
- The accommodation is intended for people with accessibility/support needs and is claimed to provide stable, managed occupation rather than a transient/high-turnover HMO.
- The York Avenue and Hanover Circle decisions relied upon by the Council concerned much larger 9/10-person and 8-person HMOs and are therefore said to be materially distinguishable.
- There are only minor external alterations, with no extension or increase in built form and no additional overlooking, overshadowing or loss of privacy.
- There is no adopted policy requiring a four-person HMO to provide a separate communal lounge or dining room in addition to a shared kitchen.
- The bedrooms exceed minimum standards, have good light/outlook and en-suites, while the shared kitchen is claimed to provide sufficient space for cooking, dining and interaction.
- The rear garden exceeds the Council's 100sqm amenity-space requirement and provides additional recreational/social space.

- HMOs provide an alternative form of accommodation, and particular weight is placed on the proposed provision for residents with accessibility needs.

2.2 The matters raised within the appellant's Statement of Case are noted. The LPA does not seek to repeat the detailed assessment contained within the Officer's Delegated Report. This statement instead responds to the principal areas of disagreement raised by the appellant and should be read alongside the Delegated Report and the appeal decisions appended to this statement.

Policy DMH 5 and HMO Concentration

2.3 The appellant places considerable emphasis on the LPA's inability to conclusively establish the number of existing HMOs within the surrounding area and therefore whether the numerical thresholds within Policy DMH 5(B)(i) and (iii) are exceeded. However, the application was not refused on the basis that these thresholds had been exceeded. The Delegated Report expressly acknowledged the limitations of the available evidence and did not reach such a conclusion.

2.4 These arguments therefore do not address the reasons for refusal. Policy DMH 5(B)(iv) separately requires HMO accommodation to comply with relevant planning standards and not result in a detrimental impact upon the residential amenity of adjoining properties. Furthermore, Policy DMH 5 does not displace other Development Plan policies concerning residential amenity, character and the living conditions of future occupiers. It is against these matters that the proposal was found unacceptable.

2.5 The LPA agrees that the Article 4 Direction does not establish a presumption against HMOs. Its effect is to require proposals which might otherwise have benefited from permitted development rights to be considered through the planning application process and assessed against the Development Plan. That is the approach taken in this case.

Residential Amenity and Intensity of Occupation

2.6 The appellant argues that the proposed four-person HMO would be comparable in occupancy terms to a C3 family dwelling and that there is no evidence that four unrelated occupants would necessarily generate greater activity. The LPA does not consider that numerical occupancy alone provides an appropriate comparison. The relevant distinction concerns the nature and pattern of occupation.

2.7 The proposed HMO would accommodate four persons forming separate households. Each occupant would be capable of maintaining independent daily routines, receiving separate visitors and deliveries and making individual journeys to and from the property. The internal arrangement reinforces this individualised form of occupation, with each bedroom provided with its own en-suite and the kitchen representing the only shared internal space.

2.8 The LPA does not contend that every HMO will necessarily result in unacceptable noise or disturbance, nor that unrelated occupants inherently cause such harm. The assessment is specific to the proposal and its context. Woodville Gardens is a quiet residential street predominantly characterised by modest dwellings in single-household occupation. In this context, the more individualised pattern of occupation

facilitated by the proposal would result in a materially different and more intensive pattern of activity, including more dispersed comings and goings, with consequential impacts upon neighbouring occupiers.

Recent HMO Appeal Decisions

- 2.9 The appellant seeks to distinguish the appeal decisions referred to within the Delegated Report on the basis that they concerned larger HMOs. The LPA acknowledges the difference in scale. However, since determination of the application, further appeal decisions within the Borough provide additional consideration of the distinction between C3 and C4 patterns of occupation, including in circumstances more closely comparable to the appeal proposal.
- 2.10 Of particular relevance is the appeal at 21 Green Lane, Hillingdon (PINs ref. 6008246), concerning the change of use of a dwellinghouse to a five-person C4 HMO. The Inspector expressly acknowledged that the existing C3 dwelling could feasibly accommodate a single household of at least five people and that the number of occupants might therefore not be materially different. Nevertheless, the Inspector found that HMO occupation would increase the likelihood of individual occupants living relatively independently, with their own patterns of comings and goings, including visitors and deliveries. The Inspector further observed that members of a single household would generally have greater opportunity for shared trips and a more coordinated approach to such activity.
- 2.11 Significantly, the Green Lane Inspector acknowledged that previous appeal decisions concerning larger HMOs were not directly comparable. Nevertheless, she considered that those decisions demonstrated the different and more intensive pattern of activity typically associated with HMO occupation, which can be more intrusive than that of a single household of similar scale. Having regard to the quiet suburban character of Green Lane and the relationship with neighbouring properties, the Inspector concluded that even the relatively low level of occupation proposed would result in materially detrimental noise and disturbance.
- 2.12 Similar conclusions were reached at 11 Maygoods View, Uxbridge (PINs ref. 6005866), concerning a six-person C4 HMO. The Inspector acknowledged that a C3 dwelling could accommodate a large family but nevertheless found that occupation by multiple separate households represented an intensification of use, with differing patterns of movement, social interaction and daily activity and the potential for increased noise and disturbance. The Inspector found that this would harm both the character of the area and the living conditions of neighbouring residents.
- 2.13 The LPA does not suggest that these decisions establish that HMO occupation is inherently harmful. Each proposal must be considered on its individual merits. They are, however, directly relevant to the appellant's contention that a C4 HMO should effectively be treated as comparable to a C3 dwelling simply because similar numbers of people could occupy either use. Recent Inspectors have expressly recognised that the pattern and intensity of occupation can materially differ even where numerical occupancy may be similar.
- 2.14 The appeal at 14 Willow Tree Lane, Hayes (PINs Ref. 6004329) concerned a larger sui generis HMO and is therefore less directly comparable. Nevertheless, the Inspector

similarly recognised that HMO occupation increased the likelihood of residents living independently with their own patterns of comings and goings. Importantly, that decision also demonstrates the need for a site-specific assessment: the Inspector did not find character harm in that instance because the site was situated against a background of road traffic, commercial activity and varied surrounding uses capable of absorbing the different pattern of activity. Woodville Gardens is materially different, being a quieter and predominantly residential environment.

Intended Occupants and Management

- 2.15 The appellant places weight on the intended occupation of the property by persons with accessibility and support needs and asserts that the property would not operate as a high-turnover or transient HMO. It is further asserted that residents would have stable occupancy and that daily activity would be comparable to, or lower than, a conventional family dwelling.
- 2.16 The LPA acknowledges that the application was presented as accommodation intended for persons with accessibility needs and that the supporting information describes a managed form of accommodation. The submitted Property & Service Standards refers, amongst other matters, to regular Housing Officer visits, property inspections and procedures for addressing breaches of the conditions of occupation. These arrangements provide evidence as to how the accommodation may be managed, but they do not demonstrate that its occupants would have longer or more stable periods of occupation.
- 2.17 No evidence has been provided to demonstrate that persons with accessibility or support needs would necessarily remain at the property for longer periods, experience lower turnover, or generate a less intensive pattern of activity than other HMO occupants. The Accessible Homes document explains the need for, and physical characteristics of, specialist accessible accommodation, but provides no evidence concerning the anticipated duration or stability of individual occupation.
- 2.18 Indeed, the appellant's own Welcome Pack describes the accommodation provided by Stef & Philips as temporary accommodation occupied pursuant to an allocation by a local authority. It expressly states that such accommodation is temporary or interim, that occupants do not enjoy the same security of tenure as those in permanent accommodation, and that their right to remain continues only until the Council or Stef & Philips requires them to leave. Elsewhere, the document states that the accommodation is "never going to become your permanent home" and that occupants may be required to leave at any time subject to appropriate notice. The submitted evidence therefore does not substantiate the appellant's assertion that the proposed occupation would inherently be stable or non-transient.
- 2.19 Furthermore, planning permission is sought for the use of the property as a small HMO within Use Class C4. The application does not seek permission for a particular form of supported or temporary accommodation, nor has any mechanism been identified through which the characteristics of future occupants, the management arrangements, duration of occupation or anticipated levels of activity would be secured for the lifetime of the development.

2.20 The appeal should therefore be determined having regard to the use for which planning permission is sought and its reasonable planning consequences, rather than an assumed future pattern of occupation which is neither evidenced nor secured.

Living Conditions of Future Occupiers

2.21 The appellant argues that the Council has imposed a requirement for a separate communal lounge which is not contained within adopted planning policy. This mischaracterises the first reason for refusal. The LPA does not contend that Development Plan policy imposes a prescriptive requirement for every four-person HMO to provide a separate lounge. The issue is whether the accommodation, considered as a whole, would provide satisfactory living conditions for its intended occupants.

2.22 Policy D3 of the London Plan requires development to deliver appropriate amenity and indoor environments which are comfortable and inviting. Policy D6 requires housing to provide comfortable and functional layouts which are fit for purpose. Policy DMHB 16 similarly requires adequate internal space to provide an appropriate living environment. These are qualitative requirements and are not satisfied solely through compliance with minimum bedroom dimensions.

2.23 The proposed accommodation comprises four individual en-suite bedrooms served by a single shared kitchen. No communal lounge, separate dining room or other internal communal living or recreational space is provided. The kitchen would therefore need to accommodate the shared requirements of four separate households, including food preparation, cooking and dining, whilst also representing the only internal space available for communal interaction.

2.24 The LPA acknowledges that the individual bedrooms meet the applicable minimum bedroom standards and provide acceptable outlook and natural light. However, those matters do not determine the quality of the accommodation as a whole. Minimum bedroom dimensions represent one component of residential quality and do not remove the requirement to consider whether the overall layout is comfortable, functional and fit for purpose.

2.25 The recent Maygoods View decision supports the principle that compliance of individual bedrooms with numerical space standards does not preclude a separate assessment of shared facilities and the overall living environment. In that case, the Inspector expressly acknowledged that the bedrooms met the standards within Policy DMHB 16 and London Plan Policy D6, before separately considering whether the shared accommodation would meet the needs of future occupiers. The particular circumstances of that appeal differed from the present case, but the approach to assessing residential quality is relevant.

2.26 Similarly, the absence of a numerical Development Plan standard prescribing a minimum communal kitchen or living area does not prevent a qualitative assessment against Policies D3, D6 and DMHB 16. The substantial rear garden is acknowledged, but external amenity space performs a different function from internal communal living accommodation and does not remedy deficiencies within the internal layout.

2.27 The LPA therefore maintains that the proposed layout would provide an overly individualised form of accommodation without sufficient shared internal living space to provide a comfortable, functional and satisfactory living environment for four separate households.

Character of the Area

2.28 The appellant places emphasis on the limited physical alterations to the property and the continuation of a residential use. The LPA accepts that the external alterations themselves are modest. However, the third reason for refusal concerns the character of the use and the way in which that use would manifest itself, rather than principally the architectural appearance of the alterations.

2.29 Character is influenced not only by the physical appearance of buildings but also by the nature and intensity of their occupation. Woodville Gardens is predominantly characterised by modest dwellinghouses in single-household occupation, contributing to a relatively low-intensity residential character.

2.30 As set out above, the proposal would enable four separate households to occupy the property independently. This would facilitate separate patterns of daily activity and has the potential to manifest externally through more dispersed comings and goings, visitors, deliveries, servicing activity and domestic paraphernalia associated with separate occupiers. Whilst individual elements may not be harmful in isolation, their cumulative effect would result in a materially different character of occupation from the predominantly single-household character of Woodville Gardens.

2.31 The Maygoods View decision is relevant in this respect. Despite the continued residential use and the fact that a C3 dwelling could accommodate a large family, the Inspector found that occupation by multiple separate households represented an intensification of use and that the associated differences in movement, social interaction and daily activity would harm the character of the area as well as neighbouring living conditions.

2.32 Conversely, Willow Tree Lane demonstrates why context is important. There, the Inspector found that the different pattern of activity associated with an HMO could be absorbed without material character harm because of the existing road traffic, commercial activity and varied uses surrounding the site. Such characteristics are not present at Woodville Gardens. The appeal site lies within a quieter residential street whose character is predominantly derived from modest dwellings in single-household occupation.

2.33 The LPA therefore maintains that the intensified and more individualised nature of the proposed use would erode the established residential character of Woodville Gardens. The harm identified arises from the nature and pattern of occupation and its external manifestations, rather than the limited physical alterations to the building.

Housing Need and Planning Balance

2.34 The LPA acknowledges that HMOs can contribute towards meeting a range of housing needs and that the stated intention to provide accessible accommodation is a consideration in favour of the proposal. However, these benefits do not remove the

requirement to provide satisfactory living conditions or avoid unacceptable impacts upon neighbouring occupiers and local character.

- 2.35 Recent appeal decisions also indicate that the contribution made by converting an existing residential property to an HMO should not be overstated. At Green Lane, the Inspector recognised that the proposal would provide a different form of generally lower-cost shared housing, but found that because the site was already in residential use, the benefits to housing supply and efficient use of land were very modest. A similar conclusion was reached at Willow Tree Lane.
- 2.36 In the present case, the appeal property already provides residential accommodation. Whilst the proposed HMO would provide a different form of housing and the intended provision of accessible accommodation attracts positive weight, the resulting contribution to overall housing supply would be limited.
- 2.37 These benefits do not outweigh the identified conflict with the Development Plan arising from the substandard internal living environment and the impacts upon neighbouring residential amenity and the established character of the area.

3. Other Matters

- 3.1 The Officer's Delegated Report and relevant Development Plan policies should be read alongside this Statement of Case.
- 3.2 Since determination of the application, the National Planning Policy Framework was revised in August 2026. The LPA has had regard to the revised Framework in preparing this Statement. The Council's case remains principally founded upon the relevant policies of the adopted Development Plan.
- 3.3 The following recent appeal decisions within the London Borough of Hillingdon are appended to this Statement and have been referred to where relevant:
- **Appendix 1:** 21 Green Lane, Hillingdon - PINs ref. 6008246 dated 23 July 2026
 - **Appendix 2:** 11 Maygoods View, Uxbridge - PINs ref. 6005866 dated 16 July 2026
 - **Appendix 3:** 14 Willow Tree Lane, Hayes - PINs ref. 6004329 dated 23 July 2026

4. Conclusion

- 4.1 The LPA maintains that the proposal would fail to provide a satisfactory living environment for future occupiers and would result in a more intensive and individualised pattern of occupation harmful to the residential amenities of neighbouring occupiers and the established character of Woodville Gardens.
- 4.2 The appellant's comparison between the proposed four-person HMO and occupation of the property by a similar number of persons within Use Class C3 does not fully reflect the different nature and pattern of occupation enabled by the proposed use. Recent appeal decisions within the Borough, including the five-person C4 HMO at 21 Green

Lane, expressly recognise this distinction whilst confirming that the resulting effects must be assessed against the particular circumstances of each site.

- 4.3 The appellant has also provided no substantive evidence to demonstrate that the intended occupation by persons with accessibility or support needs would necessarily result in the stable or lower-intensity pattern of occupation asserted. In any event, those characteristics would not be secured by the unrestricted C4 permission sought.
- 4.4 The fact that individual bedrooms comply with minimum size standards, that adequate external amenity space is available and that the physical alterations are limited does not overcome the identified harms. The relevant Development Plan policies require a qualitative assessment of the overall living environment, neighbouring amenity and local character.
- 4.5 Accordingly, the LPA maintains that the development conflicts with the Development Plan when read as a whole and that the material considerations advanced by the appellant do not outweigh that conflict. The Inspector is respectfully requested to dismiss the appeal.
- 4.6 In the event that the Inspector is minded to allow the appeal, and without prejudice to the LPA's case, a schedule of suggested planning conditions is provided at Appendix 4.

Appendices

Appendix 1 - Appeal Decision for 21 Green Lane, Hillingdon (PINs ref. 6008246)

Appendix 2 - Appeal Decision for 11 Maygoods View, Uxbridge (PINs ref. 6005866)

Appendix 3 - Appeal Decision for 14 Willow Tree Lane, Hayes (PINs ref. 6004329)

Appendix 4 - Recommended Conditions

Appeal Decision

Site visit made on 7 July 2026

by Jane Smith MA MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 23 July 2026

Appeal Ref: 6008246

21 Green Lane, Uxbridge, Hillingdon UB8 3ED

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
- The appeal is made by Mr Harun Mehra against the decision of the Council of the London Borough of Hillingdon.
- The application Ref is 49724/APP/2025/3002.
- The development proposed is the change of use of a dwellinghouse (Use Class C3) to a House in Multiple Occupation (HMO) for 5 occupants (Use Class C4).

Decision

1. The appeal is dismissed.

Preliminary Matters

2. When the application was made, the application form stated that the proposed change of use had not started. However, representations from interested parties allude to use as an HMO (house in multiple occupation) having commenced and there were some indications that was the case at the time of my site visit. To that extent, I am considering the proposal retrospectively. For the avoidance of doubt, I have considered the development as detailed in the application, including in relation to the proposed level of occupation by up to five occupants.
3. The Council's Officer Report did not refer to the representations which had been made by interested parties on the planning application. However, copies were forwarded with the evidence for this appeal. A summary which had been omitted from the report has also been provided by the Council. For fairness, the appellant has had the opportunity to review and comment on both the summary and the representations themselves, and I have had regard to that response.
4. In addition to the two appeal decisions referred to in their statement of case, the Council has drawn my attention to a more recent appeal decision ref 6002695, determined on 12 June 2026 (the Oakdene Road decision). The subject matter is relevant to this appeal, as it also concerns conversion of an existing dwelling to a 5-person HMO. The appellant has had sight of the Oakdene Road decision and provided comments on it, as well as on the other decisions referred to by the Council. I have taken all three appeal decisions into account and am satisfied that no unfairness would arise as a result of my having done so.

Main Issue

5. The main issue is the effect of the change of use on living conditions for occupiers of neighbouring properties, with particular regard to noise and disturbance.

Reasons

6. The appeal property is a bungalow which has been extended at roof level and at the rear. It currently provides five bedrooms, a kitchen/living space, a snug and an upstairs room described as a study. There is a detached outbuilding at the rear, which was furnished with desks and chairs at the time of my inspection. In use as a 5-person HMO, it is proposed that much the same layout would be retained, but that the snug would be adapted to provide cycle storage.
7. Many of the dwellings along Green Lane are bungalows of modest proportions. Some have been extended, but they retain compact footprints and are sited close together, on narrow plots with small gardens and driveways. Externally, the appeal site is hard surfaced, with block walls marking the boundaries. At the front, those are low, which allows easy visibility across the boundary. Both of the adjacent bungalows include ground floor windows close to and overlooking the appeal site, including some in the side elevation of 19 Green Lane which face directly towards the front driveway.
8. Policy DMH5 of the Hillingdon Local Plan Part Two (2020) includes several criteria for change of use of dwellinghouses within Use Class C3 to HMOs within Use Class C4. These are applicable in areas where an Article 4 direction has been served removing permitted development rights for that change of use and the appeal site is within one such area. The policy requires amongst other things that HMO uses do not have a detrimental impact upon the residential amenity of adjoining properties. While such proposals may not require express planning permission outside the Article 4 area, that is not a guarantee that no detrimental impacts on living conditions for neighbours will arise.
9. No further extensions, commercial activities, plant or machinery are proposed, and a form of residential use would be continued. If occupied within Use Class C3, the extended dwelling could very feasibly accommodate a single household of at least five people, so the number of occupants may not be materially different. Nevertheless, use as an HMO would increase the likelihood that each of the occupants lived relatively independently, having their own personal pattern of comings and goings. That could include activity at unpredictable hours, including deliveries and visitors, in addition to routine trips for work and leisure.
10. HMO licensing and management measures may help to promote generally reasonable standards of behaviour, with consideration for neighbours. However, that would not adequately mitigate the fact that the proposed HMO use does, of its nature, allow for five individuals to live more independent lives than is typical of members of a single household living together as such. The latter would generally have more opportunity for shared trips and a more co-ordinated approach to other activity such as deliveries and visitors, and that would typically be associated with a lower level of comings and goings.
11. The driveway could accommodate three cars, which accords with the Council's standards for HMOs. The layout appears rather tight but may allow for each vehicle to be moved independently with care, once the access had been widened, as proposed. No highway safety harm has been alleged and there is on-street parking in the surrounding streets. Occupiers would have some options for active travel despite the relatively low Public Transport Accessibility Level score, and cycle storage would be provided.

12. Nevertheless, there would be nothing to prevent all five occupants from operating their own private motor vehicle, should they be in a position to do so. They would also have a strong incentive to park conveniently on the driveway whenever it is available, or directly outside the property. That would tend to intensify the likely level of comings and goings on and around the limited driveway area.
13. Green Lane is described in the Noise Impact Assessment¹ as an established and quiet suburban street, with no significant or unusual noise sources. Therefore, increased noise and activity in and around the site would be experienced against otherwise low levels of general background noise. The neighbouring windows appear to serve main front rooms, from which vehicle movements and other interactions between occupiers would be easily heard, particularly when windows are open.
14. Taking those factors into account, the assertion in the Transport Statement² and Noise Impact Assessment that vehicle movements would be comparable to those generated by a family household is not convincing, when considered from the perspective of neighbouring occupiers. The overall number of additional vehicle movements may be modest, as a proportion of total traffic along Green Lane. However, the very close relationship between the driveway of the appeal site and ground floor windows of the adjoining dwellings means that such activity would be particularly intrusive.
15. The three appeal decisions at Hanover Circle³, Crossway⁴ and Oakdene Road are not directly comparable, since the layout and scale of each property differs. In the Hanover Circle and Crossway appeals, the proposed level of occupation was higher than is proposed in this case. Although the more recent Oakdene Road case was also for five occupants, there were additional concerns about proposed extensions and internal transmission of noise between semi-detached properties. Nevertheless, all three decisions allude to the different and more intensive pattern of activity typically associated with an HMO, which can be more intrusive than that of a single household of similar scale.
16. Despite the relatively low level of occupation proposed, when the specific relationship between the appeal property and its neighbours is taken into account, I conclude that the change of use would have a materially detrimental effect on living conditions for occupiers of neighbouring properties, as a result of increased noise and disturbance. That would conflict with Policy DMH5, as summarised above. It would also conflict with Policy DMHB11 in the Part Two Local Plan and Policies D2 and D13 of the London Plan 2021. Those policies require, amongst other things, that development does not adversely impact on the amenity of adjacent properties and that noise impacts from development which would affect occupiers of neighbouring properties are avoided or effectively mitigated.

Other Considerations and Planning Balance

17. A shortfall in the Council's five year housing land supply is alluded to in the recent Oakdene Road appeal decision. That being so, paragraph 11d of the National Planning Policy Framework (the Framework) is applicable.

¹ Dale Venn Architects Ltd, Noise Impact Assessment January 2026

² Dale Venn Architects Ltd, Transport Statement January 2026

³ Appeal ref APP/R5510/W/25/3372543

⁴ Appeal ref APP/R5510/W/25/3360554

18. A different form of housing would be provided on the site, which would cater for those seeking generally lower cost, shared housing of this nature. It would also utilise a small, previously developed site. Nevertheless, since the site is already in residential use, any benefit to the housing land supply or efficient use of land would be very modest indeed.
19. The Council did not allege that the living environment would be unsuitable for the occupiers, or that any over-concentration of HMO uses would arise. However, those are neutral considerations, weighing neither for nor against the proposal.
20. The harmful effect on living conditions would be localised, predominantly affecting occupiers of the two adjacent properties. However, given the particularly close relationship with those properties, and the generally quiet surroundings, it would be sufficient to have an adverse and enduring effect on those nearby residents. Development plan requirements that the amenity of neighbouring occupiers should be safeguarded are consistent with similar requirements in the Framework, notably in paragraph 135 which requires that development provides a high standard of amenity for existing and future users. As such, the harm to living conditions carries significant weight.
21. Even in the context of a significant housing land supply shortfall, the adverse impact of the development would significantly and demonstrably outweigh the very modest benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to policies for securing well-designed places. Therefore, the development does not benefit from the presumption in favour of sustainable development as set out in paragraph 11d.
22. A range of other issues were raised by interested parties but did not feature in the Council's reasons for refusal. Since I have concluded that the development would be unacceptable for the reasons given above, there is no need for me to address those matters any further.

Conclusion

23. The development conflicts with the development plan and the material considerations do not indicate that the appeal should be decided other than in accordance with it. Therefore, the appeal should be dismissed.

Jane Smith

INSPECTOR

Appeal Decision

Site visit made on 5 June 2026

by Timothy Parton BA(Hons) MPLAN MRTPI

an Inspector appointed by the Secretary of State

Decision date: 16 July 2026

Appeal Ref: 6005866

11 Maygoods View, High Road, Uxbridge UB8 2HG

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by A Arora against the decision of the Council of the London Borough of Hillingdon.
 - The application Ref is 77266/APP/2025/2557.
 - The development proposed is change of use from Class C3 to Class C4 HMO for 6 persons.
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Decision

1. The appeal is dismissed.

Main Issues

2. The main issues are:
 - i. the effect of the proposal in meeting local housing need;
 - ii. the effect of the proposal on the character of the area and the living conditions of nearby residents, with particular regard to noise and disturbance;
 - iii. the effect of the living accommodation on the living conditions of future occupants of the proposed dwelling, with particular regard to internal and private external space; and
 - iv. whether the proposal would make adequate provision for parking.

Reasons

Meeting local housing need

3. The proposal would replace a Class C3 dwelling with a Class C4 house in multiple occupation (HMO). Policy DMH 1 of the London Borough of Hillingdon Local Plan Part 2: Development Management Policies (2020) (the Part 2 Plan) states that the net loss of existing self-contained housing will be resisted unless it is replaced by at least an equivalent amount of residential floorspace. A HMO does not constitute self-contained housing, as the accommodation would not be occupied as a single household with exclusive use of all facilities behind a single access.
4. Furthermore, I note the evidence indicating a substantial Borough-wide need for larger private market dwellings. The proposal would result in the loss of a five-bedroom dwelling from the existing housing stock, thereby further exacerbating this need.

5. While the proposal would not result in an overconcentration of HMOs within the area and would therefore accord with this requirement of Policy DMH 5 of the Plan, it would lead to the loss of an existing self-contained Class C3 dwelling. Consequently, the proposal would conflict with Policy DMH 1 of the Part 2 Plan, for the reasons set out above.

Character of the area

6. The existing property is a five-bedroom dwelling situated among similarly sized family homes. While the appeal site fronts onto a busy main road, the surrounding area, including Benbow Way and adjoining streets, is characterised by a relatively quiet suburban residential environment.
7. The proposal would result in a material change in the use of the property. A Class C3 dwelling typically accommodates a single household, whereas the proposed HMO would accommodate multiple separate households. Although a Class C3 dwelling could be occupied by a large family, the proposal would nevertheless represent an intensification of use, with occupiers likely to have differing patterns of movement, social interaction, and daily activity. As a result, the proposal would have the potential to generate increased levels of noise and disturbance, both within and outside the property, compared with a Class C3 dwelling. This would harm the character of the area and the living conditions of neighbouring residents.
8. While it is suggested that soundproofing could be implemented, the proposal before me does not include details of such mitigation, and my assessment must therefore be based on the scheme as submitted. Accordingly, the proposal would conflict with Policy D13 of the London Plan (2021) which, amongst other things, requires that where noise-generating development is proposed in proximity to residential uses, appropriate measures should be secured to mitigate and manage potential impacts.
9. Furthermore, the proposal would also conflict with Policies DMH 5 and DMHB 11 of the Part 2 Plan and Policy D3 of the London Plan which, amongst other things and taken together, require proposals to demonstrate that there will be no adverse impact on the amenity of neighbouring properties or the character of the area.
10. I have considered the suggestion that any resulting noise and disturbance could also affect the living conditions of future occupiers of the proposal. However, future residents would be those seeking HMO-type accommodation, where a degree of activity, noise, and disturbance associated with multiple households living in close proximity is an inherent characteristic. In addition, I have no evidence to indicate that the level of noise and disturbance arising from this proposal would exceed that typically associated with such accommodation.

Living conditions of future occupiers

11. While Policy DMHB 18 of the Part 2 Plan does not prescribe an external space standard for HMOs, I note the suggestion that provision equivalent to that required for a four-bedroom or larger dwelling should be achieved. The property benefits from both a front and rear garden, although the parties dispute whether the front garden should be regarded as private space. Based on my observations on site and the evidence before me, front gardens in the area are commonly used for amenity purposes, particularly where garages and driveways are located to the rear. Furthermore, the sunken nature of the front garden relative to the adjacent

footway and road, together with existing boundary fencing, would allow it to function as external private space.

12. Taking both the front and rear gardens into account, the proposal would provide a level of external private space in excess of that typically expected for a four-bedroom or larger dwelling. Accordingly, the proposal would comply with Policy DMHB 18 of the Part 2 Plan which, amongst other things, requires all new residential development to provide good quality and useable external private amenity space in accordance with prescribed standards.
13. In relation to internal space, the evidence before me demonstrates that the proposed bedrooms would meet the internal space standards set out in Policy DMHB 16 of the Part 2 Plan and Policy D6 of the London Plan. However, I note concerns that the shared facilities, including the kitchen / dining area, bathrooms, and playroom, would be of insufficient size to meet the needs of future occupiers.
14. In particular, the Council have stated that the recent rear extension, forming a kitchen and dining area, is unauthorised. Whilst this is disputed by the appellant, no definitive evidence has been provided to confirm that planning permission has been granted. As such, it remains possible that enforcement action could be pursued, which could result in the removal of these works and so the loss of the proposed kitchen and dining area.
15. Given this, the proposal would fail to provide satisfactory living conditions for future occupiers. It would therefore conflict with Policy DMH 5 of the Part 2 Plan and Policy D3 of the London Plan which, amongst other things, require proposals to provide satisfactory living conditions for the intended occupiers and to achieve indoor environments that are comfortable and inviting for people to use.
16. The proposal would also conflict with paragraph 135 of the National Planning Policy Framework (the Framework) which, amongst other things, seeks to ensure that new development creates a high standard of amenity for future occupiers.
17. I have also considered Policy DMHB 11 of the Part 2 Plan in relation to the living conditions of future occupiers. I have no reason to conclude that, even in the absence of the rear extension, the proposal would fail to make adequate provision for the storage and collection of general, recyclable, and organic waste bins. Accordingly, I find no conflict with Policy DMHB 11 in this regard.

Parking

18. The proposal makes no provision for off-street parking. Although it is presented as a 'car-free' development, no mechanism is provided to secure this arrangement. Furthermore, whilst it is stated that space may be available within the site to accommodate a single vehicle, including electric vehicle charging, the submitted plans do not identify the location of such provision or demonstrate how it could be delivered.
19. Although the appeal site benefits from access to local amenities and nearby bus services, it lies within an area with a Public Transport Accessibility Level (PTAL) of 1b, indicating very poor access to public transport. In these circumstances, the site is not well suited to a car-free form of development and it is likely that future occupiers would own vehicles and require parking provision in the vicinity.

20. In the absence of off-street parking provision, the proposal would fail to comply with the parking standards set out in Policy DMT 6 of the Part 2 Plan. Although there are no parking restrictions on the surrounding roads, I observed on site that on-street parking demand is already high. As a result, the development would likely increase parking demand in the area, to the detriment of the free flow of traffic. Furthermore, vehicles slowing or stopping while searching for parking spaces, inappropriate parking, including in the vicinity of junctions, and the difficulties associated with passing oncoming vehicles where roads are constrained by parked cars, would be likely to harm highway safety.
21. Accordingly, the proposal would conflict with Policies DMT 1, DMT 2, and DMT 6 of the Part 2 Plan and Policy T4 of the London Plan which, amongst other things and taken together, set out local parking standards and require proposals to have no significant adverse transport impacts on the local environment and the safety of all road users. The reason for refusal also includes Policy T6 of the London Plan. However, in the absence of specific standards for HMO development, I agree with the Council that the local standards set out in the Part 2 Plan are more relevant in this instance. Policy T6 is therefore not determinative of the matter before me.
22. The proposal would also conflict with paragraph 116 of the Framework which, amongst other things, states that development should be refused where it would result in an unacceptable impact on highway safety.
23. The proposal includes provision for cycle parking, and I am satisfied there is sufficient space to ensure that the requirements of Policy DMT 5 of the Part 2 Plan and Policy T5 of the London Plan can be achieved. While concerns have been raised regarding the use of the front garden for this purpose, I observed on site that it is common within the area for front gardens to accommodate a range of uses, including cycle storage. The front garden is enclosed by existing boundary fencing and accessible via a gate and from the front entrance, providing a secure and usable area. Accordingly, the proposal would comply with Policy DMT 5 of the Part 2 Plan, Policy T5 of the London Plan, the London Cycling Design Standards (2016), and Local Transport Note 1/20: Cycle Infrastructure Design (2020), which, amongst other things, set out requirements for cycle parking and the provision of high-quality cycling infrastructure.

Other Matters

24. I acknowledge that only one objection was raised by neighbouring residents. However, the lack or absence of objections does not in itself render a proposal acceptable, as representations are only one factor in the determination of planning applications and appeals.

Conclusion

25. Although there would be compliance with some aspects of the development plan, I give greater weight to the identified harms relating to meeting local housing needs, the effect on the character of the area, the living conditions of future occupiers, and parking. For the reasons given above, I conclude that the proposal would conflict with the development plan as a whole and there are no material considerations that would outweigh that conflict. Therefore, the appeal should be dismissed.

Timothy Parton

INSPECTOR

Appeal Decision

Site visit made on 7 July 2026

by **Jane Smith MA MA MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 23rd July 2026

Appeal Ref: 6004329

14 Willow Tree Lane, Hayes, Hillingdon UB4 9BB

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Sunny Singh against the decision of the Council of the London Borough of Hillingdon.
 - The application Ref is 5516/APP/2025/2441.
 - The development proposed is Change of use from Class C3 dwelling house to 7-bedroom/maximum 8 person HMO Use Class Sui Generis.
-

Decision

1. The appeal is dismissed.

Preliminary Matters

2. A Lawful Development Certificate (LDC) was sought and granted in November 2025¹, confirming that, at the date of that application, a change of use of the site could lawfully be made from a dwellinghouse (Use Class C3) to a house in multiple occupation (HMO) for up six occupants (C4)². Shortly after that decision, an Article 4 Direction was served by the Council, withdrawing the permitted development rights which would have been relevant to their decision to grant the LDC.
3. According to the appellant, the property is currently being occupied as a 6-person HMO within Use Class C4, and there were clear indications to that effect at the time of my site visit. However, there is a dispute between the parties as to whether that change of use was implemented before or after the Article 4 Direction was served, and therefore whether the current C4 HMO use is lawful. Another application for an LDC is also mentioned in the appeal evidence, which sought the Council's confirmation whether a 7-person HMO would be a material change of use. However, I have no information as to the outcome of that application.
4. As the appellant has acknowledged, it is not the purpose of this appeal to determine the lawfulness of any existing HMO use on the site. The planning application which led to this appeal was for change of use from a dwellinghouse within Use Class C3. That is the existing use of the property as specified on the application form and it is also how it was described in the application documents. I have therefore considered the proposal on that basis.
5. The current internal layout differs somewhat from that shown on the plans, in relation to the location of communal areas and which rooms are being used as bedrooms. However, since that is linked to the existing C4 HMO use, it is of limited

¹ Application ref 5516/APP/2025/2218

² Use classes as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended)

relevance to the consideration of this appeal. I have considered the proposed change of use on the basis of the plans submitted with the application.

6. Amended plans were submitted with the appeal, proposing an alternative driveway and parking layout. That would include widening the existing access and an alternative layout for car parking, cycle storage, waste and recycling. That would substantively change the proposed access and parking arrangements. Although the Council's statement of case notes the potential for an alternative layout to be secured by condition, it does not comment on the merits of the amended plans. Nor is there any clear evidence that the Highways Authority or other relevant interested parties have seen and understood the amended layout or had an adequate opportunity to comment on it. Consequently, in the interests of fairness for all affected parties, I have not taken the amended plans into account.
7. The Council's five year housing land supply position changed while the appeal was in progress. Both parties have had the opportunity to comment on any implications for their case, and I return to that matter below.

Main Issues

8. The main issues are:
 - the effect of the proposed parking and access arrangements on highway safety,
 - whether suitable living conditions would be provided for future occupiers, having particular regard to the outlook from Bedroom 3 and the proposed outdoor amenity space,
 - the effect of the proposed change of use on living conditions for occupiers of neighbouring properties, with particular regard to noise and disturbance,
 - whether suitable provision would be made for cycle storage,
 - the effect on the character and appearance of the area, and
 - the effect of the proposed change of use on the supply of larger dwellings,

Reasons

9. The appeal property is an extended semi-detached house on two storeys. It is in a largely residential area, with other dwellings to both sides and at the rear. However, there are also various commercial uses, including a parade of shops off a service road opposite and some larger business premises on Yeading Lane. In common with its neighbours, the site includes vehicular access from Willow Tree Lane, with off-street parking on a hardstanding at the front.
10. Based on the existing plans, the property appears to have provided three-bedroom accommodation when in use as a C3 dwelling. I have therefore treated it as a three-bedroom dwelling where that is relevant to the issues before me, while being mindful that is not the current internal layout.

Highway safety

11. Two parking spaces would be provided on the existing hardstanding, as well as a cycle store for eight bicycles and storage for three waste/recycling bins. There are

no specific parking standards for large HMOs in the Part Two Local Plan³, with the table in Appendix C stating that car parking requirements will be assessed through a transport appraisal and travel plan. While the Transport Assessment⁴ confirms that two spaces would be provided, that appears simply to reflect the capacity of the hardstanding, rather than any objective assessment of demand. Comparison with the required standard for a C4 HMO use is of limited relevance for this appeal, as that is not the existing use of the site as described in the planning application.

12. There is public transport close by, including a bus stop directly opposite the site, and a range of services and facilities are within easy walking distance. Pavements, pedestrian crossing facilities and cycle infrastructure are available, as well as some traffic calming measures, and my attention has been drawn to the Council's wider strategies to support active travel. Taking all that into account, future occupants need not be dependent on travel by car, and travel by other means is actively encouraged in the proposed HMO Management Plan.
13. Nevertheless, there is nothing to prevent all 7 or 8 occupants from operating their own private motor vehicle, should they be in a position to do so. If so, that would create higher demand for parking than is typical of a semi-detached three-bedroom dwelling in single household occupation. Even if not all the occupants have a car, it is highly likely that there would be an increased demand for cars to be parked off site.
14. Parking on Willow Tree Lane is unrestricted outside the site and there is also unrestricted on-street parking in several of the surrounding streets. The appellant's Parking Survey⁵ indicates that there is generally spare capacity overall, albeit there are peak periods when 80-100% capacity is reached in some streets. When considered in relation to the whole Parking Survey area, any increased demand associated with the proposal would be minimal. However, while the 200m radius of the Parking Survey area is consistent with generally recognised methodology, some of the spaces within that area are quite inconveniently located on the other side of Yeading Lane or along some narrow residential cul-de-sacs. In practice, occupants are likely to seek out on-street parking closer to the site, with a particularly strong incentive to park directly outside whenever possible.
15. Use as a large HMO would also increase the likelihood that each of the 7 or 8 occupants lived relatively independently, having their own personal pattern of comings and goings. The Transport Assessment acknowledges an anticipated increase in vehicle trips, with around 12 additional trips per day compared to the C3 use. That is still a relatively low level when considered as a proportion of traffic within the surrounding highway network, so it would not have a severe residual impact on network capacity. Nevertheless, there would be a material intensification in the number and frequency of vehicle movements at the site access.
16. Since there would be no turning facilities, that would include additional reversing movements. Based on the swept path details, the siting of the cycle store would only just provide enough tolerance for use of the parking spaces and the Highways Authority has questioned whether adequate clear space would be available in front of the parking bays. That raises the prospect of multiple shunting movements as vehicles negotiate the rather constrained parking layout.

³ LB Hillingdon Local Plan: Part Two - Development Management Policies (2020),

⁴ Nene Valley Transport Planning Transport Assessment October 2025

⁵ Nene Valley Transport Planning Parking Survey Report October 2025

17. In addition to the bus stop opposite, the appeal site is close to the signal-controlled junction of Willow Tree Lane and Yeading Lane, and several other minor junctions and property accesses. Increased use of the access, particularly in reverse, would raise additional risk of conflict between vehicles and pedestrians within this relatively complex highway environment. That would particularly be the case when buses stop opposite and/or traffic is queued at the lights. Cars parked directly outside the appeal site could also impact visibility for those using the access.
18. Although the number of accidents reported in the Crash Map data is small, three of them were in the immediate vicinity of the site, and the fourth was only very slightly further away. The accident descriptions include interactions between cars and buses leading to personal injury and, in one case, a parked car was described as having affected pedestrian visibility. They are low speed incidents which did not cause serious injuries, and the accident records do not appear to be indicative of an inherently dangerous highway layout. However, they do provide evidence of conflict between road users, including pedestrians. The likelihood of such incidents, and possibly their severity, would increase with more intensive use of the access, in combination with increased on-street parking outside the site.
19. I conclude that the proposed access and parking arrangements would be detrimental to highway safety. The proposal therefore conflicts with relevant requirements in Policies DMT1, DMT2 and DMT6 of the Part Two Local Plan, which require, amongst other things, that development provides safe and suitable highway access arrangements. Policy T6 of the London Plan takes a generally restrictive approach to parking provision and there is no specific conflict with its strategic approach. However, the proposal would conflict with London Plan Policy T4, which requires that development proposals should not increase road danger.

Living conditions – future occupiers

20. Three of the proposed bedrooms would be on the ground floor. One of those, identified as Bedroom 3, would be sandwiched between a front-facing bedroom and the rear kitchen extension. The only source of daylight would be the single side-facing window, which faces into a very narrow path between the appeal property and its unattached neighbour. On the other side of the path, very close to the window, is the blank brick wall of the neighbouring rear extension.
21. As a result of that relationship, the outlook from Bedroom 3 would be extremely enclosed, making for a gloomy and unappealing internal environment. While the occupier would also have access to communal areas, Bedroom 3 would be their only personal, private space and that aspect of the proposed layout fails to provide a suitable standard of accommodation for future occupiers.
22. Policy DMHB18 of the Part Two Local Plan sets out requirements for private outdoor amenity space. Those requirements are relevant to all new residential development and conversions and there is no indication that conversion of an existing dwelling to an HMO is exempt. While the standards in Table 5.3 do not explicitly refer to HMOs, they do provide minimum requirements for different sizes of dwelling, ranging from 40sqm for a one-bedroom house to 100sqm for a dwelling of four bedrooms or more.
23. According to the parties, the available amenity space within the appeal site would extend to around 43-45sqm. That is only just over the Council's standard for a one-bedroom dwelling, whereas the existing dwelling provides three bedrooms

and the proposed HMO would accommodate 7-8 occupants; a level of occupation which would be more clearly comparable to a dwelling of four bedrooms or more. That being the case, the Council's 100sqm standard is of some relevance in the absence of more specific standards for HMOs.

24. Nevertheless, the private amenity space already exists, so there is already a shortfall against the above standards, which would persist even if the property remained in C3 use. The proposed outdoor space would be adequate to provide a convenient, private area for occupiers to sit out, hang washing and grow plants at a modest scale, should they choose to do so. Any prospective occupiers would be aware of the layout when choosing whether to rent a room, and it would cater for those who do not seek a larger area of garden.
25. Since occupants of an HMO tend to keep their own independent hours, there may be less demand for a space which can routinely accommodate all household members than is the case for a family dwelling. The garden would be conveniently located just outside the communal kitchen, living and dining area. It is not proposed that it would be used for cycle storage, or any other form of storage facilities. When considered together with the rest of the proposed accommodation, the rear garden would provide a limited but adequate level of outdoor space to support the proposed use.
26. Nevertheless, due to the poor outlook from Bedroom 3, I conclude that the proposal as a whole would not provide suitable living conditions for all future occupiers. That would conflict with the requirement in Policy DMH5 of the Part Two Local Plan that large HMOs provide satisfactory living conditions for the intended occupiers. However, the proposed living environment would otherwise generally accord with relevant design requirements in Policies DMHB11 and DMHB16, and the technical conflict with the outdoor amenity space standards in Policy DMHB18 is outweighed by other material considerations.

Living conditions – neighbouring occupiers

27. The Noise Impact Assessment (NIA)⁶ describes and quantifies levels of background noise at the appeal site, due mainly to traffic on Willow Tree Lane and to a lesser extent from nearby commercial uses. It proposes mitigation measures for the benefit of HMO occupiers. However, it does not consider the effect of noise and disturbance arising from the proposed use on living conditions for neighbouring occupiers.
28. Both the adjacent properties also front the road at fairly close quarters, and they both have their own vehicular access and parking areas at the front. Therefore, occupiers of those properties will already experience background noise and disturbance associated with traffic along Willow Tree Lane and they are likely to be conscious of the arrival and departure of vehicles on neighbouring driveways. Since the driveway at the appeal site is of a fixed size and already in use, the number of vehicles at any one time would not increase. Nevertheless, for the reasons previously given, the overall number of vehicle trips, and the frequency of arrivals and departures is likely to increase.
29. To one side, the appeal site adjoins the driveway and front door of 12 Willow Tree Lane. The main front windows of that property are on the other side of the front

⁶ Dice Environmental Noise Impact Assessment dated October 2025

door, which offers some physical separation from vehicle movements within the appeal site. That being the case, any additional disruption from increased vehicle movements would be very limited and not materially harmful to living conditions for the occupiers.

30. However, some of the main front windows of the attached dwelling at no. 16 are directly adjacent to the shared boundary, overlooking the proposed parking spaces at close quarters. For the reasons previously given, the increased arrivals and departures within that area would in all probability include shunting back and forward of vehicles as they manoeuvre in and out of the rather constrained spaces. Loud conversations and other interactions between occupiers arriving and departing on foot or by cycle would also be in very close proximity to the front windows of no. 16. As such, the more intensive use of the driveway would materially and harmfully increase noise and disturbance affecting those neighbouring occupiers.
31. There is no specific evidence that sound insulation between the appeal site and its attached neighbour is inadequate, although it appears an earlier application was refused on that basis. In any case, the appellant refers to intended improvements to insulation of the party wall, and details of those measures could be obtained and secured by condition. A condition could also reasonably be imposed to prevent the property being occupied by more than 8 people and would to my mind be enforceable, through co-ordination with the HMO licensing regime and/or monitoring of HMO occupation records. With those safeguards, there is no objective evidence that this alternative residential use would harmfully increase internal noise and disturbance.
32. Externally, while I have concluded that that the private amenity space would be adequate, it is nevertheless a relatively confined space where interactions between occupiers and any larger social activities would be close to the neighbouring gardens and rear windows. However, that is the existing layout, and some noise and disturbance could also be expected when the garden is used by a single household in C3 use. The size of the rear garden would to some degree limit the scope for large gatherings outdoors. When the relatively independent lifestyles of HMO occupiers is also taken into account, I am not persuaded that the risk of larger and/or noisier gatherings would be inherently greater than if the property remained as a single dwelling.
33. Nevertheless, for the reasons given above, there would be some increased noise and disturbance from use of the driveway, which would particularly affect occupiers of the attached dwelling. That is not something which could realistically be addressed by conditions and/or the proposed HMO Management Plan.
34. I conclude that the proposed change of use would have a limited but adverse effect on living conditions for occupiers of the neighbouring property at 16 Willow Tree Lane. That would conflict with relevant requirements in Policies DMH 5 and DMHB 11 of the Part Two Local Plan that development, including HMO uses, does not adversely impact on the amenity of neighbouring properties.

Cycle storage

35. Storage for eight cycles is proposed, which would accord with the minimum numerical standards in London Plan Policy T5 and Policy DMT5/Appendix C of the Part Two Local Plan. The proposed Block and Location Plan drawing includes

details of the proposed cycle shelter, to be sited within the front driveway. It would be open fronted, but covered for weather protection, and would be conveniently located close to the front door in an easily monitored position, where there is street lighting nearby.

36. As previously noted, the cycle store would be only just clear of the swept path for vehicles arriving and departing and that is a factor in the highway safety concerns. Linked to that, there is some risk that users of the cycle store would be inconvenienced by the arrival and departure of motor vehicles, and that would be at odds with the requirements in the London Cycle Design Standards (LCDS) that cycle storage is fit for purpose and well-located for use by the occupants. However, any such interactions would be at low speed and there would be space for cyclists to stand clear of arriving and departing vehicles. Based on the evidence before me, despite the relatively constrained layout, it appears that these two uses could co-exist with a reasonably foreseeable level of care and consideration between occupiers.
37. Neither the Council nor the Highways Authority have clearly explained their view that the cycle storage as illustrated on the drawings would fail to meet qualitative requirements in the LCDS and London Plan. Based on the evidence before me, for the reasons given above, I conclude that suitable provision would be made for cycle storage and there is no demonstrable conflict with Policies T5, DMT5 or the associated guidance.

Character and appearance

38. As previously described, there would be increased use of the driveway, and the cycle storage would be at the front, along with refuse and recycling bins. There would, therefore, be some external signs of the proposed HMO use. However, a residential use would be maintained, within an immediate context where fully hard surfaced driveways and parked cars are already typical of the street frontage. The additional comings and goings would take place against a background of the traffic along Willow Tree Lane and other activity associated with the assorted residential and commercial uses nearby. When considered within that context, the different pattern of activity likely to be associated with the proposed HMO use could be absorbed into the other activity and uses surrounding the site, without material harm to the character and appearance of the area.
39. When considering the effect on the character and appearance of the area, the Council's Officer Report suggested that the cycle store could be at the rear, but that is not the layout shown on the plans. Sited as proposed, the cycle store would be clearly visible from the street and a facility of the scale and nature proposed would not typically be found at a family dwelling. Nevertheless, no specific objection has been articulated by the Council to the design, siting or appearance of the cycle store. It would be a relatively modest structure, backing on to the projecting flank wall of the neighbouring property, which would provide some screening. The immediate surroundings also include commercial uses and a variety of street furniture and within that context it would not be an unduly prominent or alien feature in the street scene.
40. For the above reasons, I conclude that the proposal would not have an adverse impact on the character and appearance of the area. That aspect of the proposed change of use accords with relevant requirements in Policies DMH 5 and DMHB

11 of the Part Two Local Plan, which include that development should harmonise with the local context and that new HMO uses should have no adverse impact on the character of the area.

Supply of family dwellings

41. In the Part Two Local Plan, Policy DMH2 states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. The supporting text refers to a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties.
42. However, the focus of Policy DMH2 is on proposed residential schemes, whereas retention of existing housing is covered in Policy DMH1. That policy states that the net loss of existing self-contained housing will be resisted unless the housing is replaced with at least equivalent residential floorspace. In this case, there would not be any loss of residential floorspace, since the proposed HMO would be a residential use, which the supporting text describes as falling within the range of existing residential accommodation that is to be retained.
43. Policy DMH5 of the Part Two Local Plan sets out criteria for larger HMOs and the supporting text recognises their role in contributing to the overall supply of cheaper accommodation, particularly for students, young people and those on low income. As such, while the criteria in Policy DMH5 are relevant to the other issues considered above, the policy is broadly supportive of the use in principle.
44. I conclude that the modest effect of the proposed change of use on the supply of larger dwellings would be acceptable. When Policies DMH1, DMH2 and DMH5 are read together, that particular aspect of the proposal would accord with the development plan as a whole.

Other Considerations

45. The appeals at Victoria Lane⁷ and Harlington Road⁸ were both considered on the basis that the existing building was in use as a small HMO. For reasons previously explained, that is not the basis on which I have considered this appeal. Furthermore, the consequences of any particular HMO proposal for highway safety or living conditions are highly dependent on the site layout and other site-specific circumstances. I have reviewed the other decisions provided by both parties, but in each case the site-specific circumstances differ, and none of them outweighs the conclusions reached on those main issues in this particular case.
46. Based on monitoring data published in April 2026, the Council has confirmed that it can no longer demonstrate a five year housing land supply. The most recent published position confirms a 2.5 year supply, which is a significant shortfall. That being the case, paragraph 11d of the National Planning Policy Framework (the Framework) is applicable.
47. A different form of housing would be provided on the site, which may cater for an increased number of occupants and would contribute to the supply of generally lower cost, shared housing of this nature. Reference has been made to increasing rental costs and affordability issues for single renters in the Borough, along with

⁷ Appeal Ref: APP/R5510/W/23/3318771

⁸ Appeal Ref: APP/R5510/W/23/3321861

evidence that demand expressed online for rooms in shared housing exceeds supply within the postcode area. That is a snapshot in time based on data from a single website, but nevertheless the proposal would respond in a small way to that latent demand.

48. The proposal would also utilise a small, previously developed site. Nevertheless, since the site is already in residential use, any benefit to the housing land supply or efficient use of land would be very modest indeed.
49. The property currently appears well decorated, the communal facilities have been improved from a previous application, supporting social interaction between tenants, and proposed planting has been introduced to improve privacy in some of the ground floor bedrooms. The rooms would be en-suite, and there would be facilities for EV charging and home working. The Council has not alleged that there would be any shortfall in internal space standards or other relevant standards for HMOs. However, while the accommodation would, on the whole, be of good quality, Bedroom 3 would be a notable exception.

Planning Balance

50. The access and parking arrangements would prejudice safety both for the occupiers of the site and for other highway users including pedestrians, which could have serious consequences for affected individuals. The Framework recognises that development proposals may be refused where there would be an unacceptable impact on highway safety and paragraph 135 makes clear that the approach to creating well-designed places includes safety considerations. The development plan policies most relevant to that issue are broadly consistent with those requirements and therefore the harm to highway safety, and associated conflict with those policies, carries significant weight.
51. The harm to living conditions would have more localised impact, as it would primarily affect occupiers of one particular neighbouring property and one bedroom in the proposed HMO. Nevertheless, that would also be inconsistent with the approach in paragraph 135 to achieving well-designed places, which includes that a high standard of amenity should be provided for existing and future users. That adds additional weight to the overall harm arising from the proposal.
52. The benefits of the proposal are very modest, taking into account that the site is already in residential use and any additional net benefit to the supply of housing land would be inherently very small. Even in the context of a significant housing land supply shortfall, the adverse impacts of the development would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to policies for securing well-designed places. Therefore, the development does not benefit from the presumption in favour of sustainable development as set out in paragraph 11d.
53. A range of other issues were raised by interested parties but did not feature in the Council's reasons for refusal. However, since I have concluded that the development would be unacceptable for the reasons given above, there is no need for me to address those matters any further.

Conclusion

54. The proposal conflicts with the development plan and the material considerations do not indicate that the appeal should be decided other than in accordance with it. Therefore, the appeal should be dismissed.

Jane Smith

INSPECTOR

Appendix 4 – Suggested Planning Conditions

Without prejudice to the Local Planning Authority's case that the appeal should be dismissed, should the Inspector be minded to allow the appeal, the following conditions are suggested.

1) The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

2) The development hereby permitted shall be carried out in accordance with the following approved plans:

Location Plan

Proposed Elevation Rev. 1 dated 28.05.2026

Proposed Site Plan Rev. 1 dated 28.05.2026

AD102 Proposed Roof Plan

AD104 Proposed Elevations - B

AD105 Proposed Floor Plans

REASON

For the avoidance of doubt and in the interests of proper planning.

3) The materials to be used in the construction of the external surfaces of the development hereby permitted shall match those used in the existing building and shall thereafter be retained as such.

REASON

To safeguard the visual amenities of the area and to ensure that the proposed development does not have an adverse effect upon the appearance of the existing building in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

4) The House in Multiple Occupation (HMO) hereby permitted shall be occupied by no more than four persons at any one time and shall not be occupied as a larger HMO.

REASON

The application has been assessed on the basis of occupation by a maximum of four persons. Any greater level of occupation could result in materially different impacts upon the amenities of neighbouring occupiers, the character of the area, parking demand and the living conditions of future occupiers, contrary to Policies DMH 5, DMHB 11 and DMHB 16 of the Hillingdon Local Plan Part 2 (2020) and Policies D3 and D14 of the London Plan (2021).

4) The 2 off-street car parking spaces shown on the approved plans shall be retained and permanently maintained and made available for the parking of vehicles associated with the House in Multiple Occupation use.

REASON

To ensure that adequate off-street parking provision is retained and to prevent additional parking pressure on the surrounding highway network, in accordance with Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policy T4 of the London Plan (2021).

5) Prior to first occupation of the property as a House in Multiple Occupation (HMO), details of secure and covered cycle parking facilities for the occupants of the development shall be submitted to and approved in writing by the Local Planning Authority. The approved cycle parking facilities shall be installed prior to first occupation of the HMO and shall thereafter be permanently retained and maintained for that purpose.

REASON

To ensure that appropriate cycle parking facilities are provided and to encourage sustainable modes of transport, in accordance with Policy DMT 5 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policy T5 of the London Plan (2021).

6) Prior to first occupation of the property as a House in Multiple Occupation, details of electric vehicle charging provision serving the development shall be submitted to and approved in writing by the Local Planning Authority. The approved facilities shall be installed prior to first occupation and thereafter retained and maintained for their intended purpose.

REASON

To ensure appropriate provision for electric vehicle charging in accordance with the sustainable transport objectives of the London Plan.

7) Prior to first occupation of the property as a House in Multiple Occupation (HMO), details of facilities for the secure and covered storage of refuse and recycling shall be submitted to and approved in writing by the Local Planning Authority. The approved facilities shall be provided prior to first occupation of the HMO and shall thereafter be permanently retained and maintained.

REASON

To ensure adequate refuse and recycling facilities are provided in the interests of residential amenity and the character and appearance of the area, in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).