

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.	ADVERTISEMENT 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:	49 GLEDWOOD AVENUE HAYES	
Development:	Change of use from Class C3 Dwellinghouse to 6-bed 6-persons Class C4 HMO with no external alterations.	
LBH Ref Nos:	64670/APP/2026/249	
Drawing Nos:	Design and access statement 2026-49GA-PL-1 2026-49GA-PL-2 Design and access statement Validation checklist HMO Management Supervision Plan SITE SUPERVISION MANAGEMENT PLAN	
Date Plans received:	28-01-26	Date(s) of Amendments(s):
Date Application valid	28-01-26	

1. SUMMARY

The application seeks planning permission for a change of use from C3 dwellinghouse to 6 bed, 6 person C4 HMO.

The proposal represents a material intensification of the existing property, introducing six independent adults into a quiet, family-oriented area. This would lead to increased comings and goings, noise, disturbance and greater use of the rear garden, resulting in harm to neighbouring amenity. The submitted HMO Management Plan does not adequately mitigate these inherent impacts.

The development also fails to provide acceptable living conditions for future occupiers.

Highway impacts are also unacceptable. Only one off-street parking space is provided where three are required, likely resulting in overspill parking and associated highway safety concerns in a PTAL 1b area. The proposed vertical cycle storage fails to meet London Cycle Design Standards.

Whilst it is noted that HMO's can provide access to a form of residential accommodation to targeted occupants who do not have access to funds for other forms of residential accommodation, it is clear from the evidence which formed the report to full council that there is a considerable rise in the number of properties being converted from single family dwellinghouses to HMO's with substandard levels of living accommodation subjecting occupants to being confined to their bedroom in the absence of communal spaces despite in some cases being significantly extended. This demonstrates an over intensification of which there would be evidenced harm.

It is often the case from the Applicant that the level of harm which is derived from this type of development is akin or modestly above that of a standard family sized dwelling. However it is evidenced in recent appeal decisions that the extension and conversion of almost the entire floor area to bedrooms and the increase in occupants would result in considerable harm to local area, neighbour amenity, the environment and the local highway network.

For these reasons, the proposal conflicts with relevant policies of the London Plan, Hillingdon Local Plan, and NPPF (2024) and is recommended for refusal.

2. RECOMMENDATION

REFUSAL for the following reasons:

1. NON2 Non Standard reason for refusal

The proposed development, by reason of its increased number of independent occupiers, would generate materially greater noise, comings and goings, and garden use than the existing C3 dwelling, resulting in unacceptable disturbance to neighbouring residents. The submitted HMO Management Plan and Site Supervision Management Plan does not adequately address or mitigate the operational noise and activity associated with an intensified HMO use. The proposal is contrary to Policies DMH 5 and DMHB 11 of the Hillingdon Local Plan: Part Two (2020), Policies D3 and D13 of the London Plan (2021), and Paragraph 135(f) of the NPPF (2024).

2. NON2 Highway and Parking

The proposed development, by reasons of its insufficient car parking provision, would lead to overspill parking on the public highways and therefore increased obstruction and vehicle conflict, resulting unacceptable highway safety risks. No parking stress survey has been submitted to demonstrate that local streets can accommodate this impact. Furthermore, the proposed cycle storage is unsuitable for a communal residential use, failing to provide inclusive, accessible and policy compliant facilities for all users. The combination of inadequate car parking and substandard cycle parking provision is contrary to Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan: Part Two (2020), Policies T4, T5 and T6 of the London Plan (2021), and Paragraph 116 of the NPPF (2024).

3. NON2 Living Conditions for Future Occupiers

The proposed 6 bedroom HMO would fail to provide an acceptable standard of internal living accommodation for future occupiers. Bedrooms 2 and 3 would suffer from an unacceptable loss of privacy and amenity due to its proximity to the sole communal space and both bedrooms would not achieve any outlook given the obscure glazing of the rear facing windows and doors. The sole communal kitchen/dining space also receives limited light and outlook. As a result, the development would not deliver appropriate outlook or residential amenity, contrary to Policies D3 and D6 of the London Plan (2021), Policies DMH 5 and DMHB 16 of the Hillingdon Local Plan: Part 2 (2020), and Paragraph 135(f) of the National Planning Policy Framework (2024).

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
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes
NPPF12 -24	NPPF12 2024 - Achieving well-designed places

3. CONSIDERATIONS

3.1 Site and Locality

The application site comprises a two storey semi-detached dwelling on the North side of Gledwood Avenue, Hayes. The property has been previously extended by way of a single storey rear extension and a loft conversion to include a hip to gable roof extension and rear dormer window. A detached outbuilding is also located to the rear which is used for storage purposes.

3.2 Proposed Scheme

The application seeks planning permission for a change of use from C3 dwellinghouse to 6 bed, 6 person C4 HMO.

3.3 Relevant Planning History

64670/APP/2020/1859 49 GLEDWOOD AVENUE HAYES

Single storey outbuilding for use as a home office/storage/wc. Including part demolition of existing structure (Application for a Certificate of Lawful Development for a Proposed Development)

Decision: 03-07-2020 Withdrawn (P)

64670/APP/2020/1860 49 GLEDWOOD AVENUE HAYES

Single storey outbuilding for use as a home office/storage/wc (Part retrospective)

Decision: 04-08-2020 Approval

64670/APP/2019/969 49 GLEDWOOD AVENUE HAYES

Porch to front, single storey outbuilding to rear for use as a games room and conversion of roof space to habitable use to include a rear dormer, 2 front roof lights and conversion of roof from hip to gable end (Application for a Certificate of Lawful Development for a Proposed Development)

Decision: 14-05-2019 Approval

64670/APP/2008/1940 49 GLEDWOOD AVENUE HAYES

Erection of a single storey rear extension

Comment on Planning History

The relevant planning history is listed above.

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

8 letters of objection have been received raising the following concerns:

- Inadequate parking provision resulting in parking stress in the area
- Out of keeping with the residential character of the area
- Noise and disturbance resulting from over intensification of use
- Additional refuse generation resulting from the HMO use and impact on the area
- Increased anti-social behaviour and impact on safety

The issues raised are discussed in the sections below.

Access Officer

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

The proposal cannot be supported as it fails to demonstrate compliance with key transport and highways policies. The main shortcomings are:

- No evidence of available on-street parking capacity, despite Gledwood Avenue already exhibiting high parking stress.
- Failure to demonstrate compliance with the required parking standards, resulting in a shortfall that would increase overspill parking.
- Lack of a robust parking survey within 100m during peak residential periods to confirm that overspill demand can be safely accommodated.
- Substandard cycle access width (approx. 0.85m) within the red line boundary, falling below the 1.2m minimum required for safe, inclusive access.
- No detailed, scaled cycle parking drawings, meaning compliance with the London Plan, LTN 1/20 and LCDS cannot be verified.
- Unsupported assertions in the DAS regarding parking adequacy and cycle accessibility without any technical evidence.

These cumulative deficiencies result in clear conflict with Local Plan Policies DMT 1 and DMT 2, London Plan Policies T5 and T6, and NPPF 2025 (Sustainable Transport).

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
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
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes
NPPF12 -24	NPPF12 2024 - Achieving well-designed places

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

Policy D3 of the London Plan (2021) states that development proposals should deliver appropriate outlook, privacy, and amenity.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all development will be required to be designed to the highest standards and incorporate principles of good design. It should also not have an adversary impact on the amenity, daylight and sunlight of adjacent properties and open space. The Council will aim to ensure that there is sufficient privacy for residents and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties or onto private open spaces. 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.

PROPOSED HMO USE:

It should be noted that Hillingdon Council has now adopted an immediate Article 4 Direction to remove permitted development rights to convert properties from C3 to C4. The report made to Full Council states that the decision to adopt an immediate Article 4 Direction is because, "HMOs

require proper management, as poor maintenance can result in unsuitable housing and harm to the amenity, affecting both residents and the wider neighbourhood. There are also concerns about how converting family homes into HMOs may change the character of communities and reduce the supply of appropriately sized homes for families. The impacts of these changes can include issues related to waste management, noise and disturbance, negatively impacting the area's appearance, and sometimes lead to anti-social behaviour. Reports to the council's Planning Enforcement and Private Sector Housing teams show growing community concerns about HMO conversions, as reflected in a previous motion at Full Council in July 2024. In response, the council commissioned research to better understand the scope and impact of HMOs in the area. This work is also being used to support the council's initiatives on additional and selective licensing schemes. The full evidence is presented in Appendix 2 of this report."

Whilst it is noted that HMO's can provide access to a form of residential accommodation to targeted occupants who do not have access to funds for other forms of residential accommodation it is clear from the evidence which formed the report to full council that there is a considerable rise in the number of properties being converted from single family dwellinghouses to HMO's with substandard levels of living accommodation subjecting occupants to being confined to there bedroom in the absence of communal spaces despite in some cases being significantly extended. This demonstrates in an over intensification of which there are significant recognises and evidenced harm.

The current application seeks planning permission to convert a lawful four bedroom C3 dwelling into a six bedroom C4 HMO, with each room occupied independently. Occupiers would share kitchen facilities with each of the 6 bedrooms having an en-suite shower room. Officers consider that the proposal represents a significant uplift in occupancy when compared with the existing lawful use.

This intensification would noticeably increase daily movements, general activity, and the number of comings and goings associated with the property. The surrounding area is predominantly characterised by family dwellings where activity levels are typically low and predictable. The shift from a four bedroom family home to six unrelated adults living independently would materially change the way the property functions and how it is experienced by neighbouring residents.

A recent appeal decision for a similar proposal in Hayes (APP/R5510/W/25/3360554) is relevant to this assessment. In that case, the Inspector concluded that an HMO use would "very likely amount to a more intensive use than a family dwellinghouse" and would result in greater levels of disturbance due to the different living patterns of independent adults. The Inspector also found that such intensification would be harmful to both the character of the area and the amenity of neighbouring occupiers. The same principles apply here.

The original dwelling on the application site was designed for a small household. Accommodating six individuals in separate rooms - with no enhanced sound insulation, increased reliance on the rear garden, and a substantial rise in independent comings and goings - would result in a level of activity beyond what the area can reasonably absorb. Given the quiet residential context, characterised by family homes, the resultant intensification would be unacceptably disruptive to neighbouring occupiers.

The proposal would introduce a significantly higher level of activity within the property, including greater use of internal spaces, increased comings and goings, and more frequent use of the rear garden. This level of activity, associated with six independent adults living separately within one dwelling, is materially greater than what would reasonably be expected from a single C3 household. As such, the development is considered to result in an over intensification of the site, giving rise to unacceptable levels of noise and disturbance to neighbouring occupiers.

Taken together, the expected increase in noise, movement, and general disturbance would be materially harmful to residential amenity, contrary to London Plan Policy D3 and Local Plan Policies DMHD 1, DMH 5 and DMHB 11, as well as NPPF paragraph 135(f), all of which require development to safeguard the living conditions of neighbouring residents.

7.2 Impact on Street Scene

Policies D3 and D4 of the London Plan (2021) require development proposals to be of high quality and to enhance the local context by delivering buildings and spaces that positively respond to local distinctiveness.

Policy BE1 of the Hillingdon Local Plan: Part One Strategic Policies (2012) seeks a quality of design in all new development that enhances and contributes to the area in terms of form, scale and materials; is appropriate to the identity and context of the townscape; and would improve the quality of the public realm and respect local character.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that new development must be designed to the highest standards and incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding: · scale of development, considering the height, mass and bulk of adjacent structures; · building plot sizes and widths, plot coverage and established street patterns; · building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure; architectural composition and quality of detailing; local topography, views both from and to the site; and impact on neighbouring open spaces and their environment.
- ii) ensuring the use of high quality building materials and finishes;
- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

The application does not seek permission for extensions or external alterations to the existing dwelling. The secure cycle storage is shown to be located in the rear garden and would not result in a harmful visual impact. As such the proposal complies with the overarching aims of Policies D3 and D4 of the London Plan (2021), Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012), and DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

7.3 Traffic Impact/Pedestrian Safety

See below

7.4 Carparking & Layout

Paragraph 116 of the NPPF (2024) 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 117c) of the NPPF (2024) continues by stating -. Within this context, applications for development should: 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.

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.

London Plan (2021): Policy T6.1 (Residential Parking) requires that new residential development should not exceed the maximum parking standards as set out in Table 10.3.

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 DAS states the site has a PTAL rating of 2, however TfL Webcat site shows it to be 1b indicating very poor access to public transport, and consequently a high reliance on private car use. As the London Plan (2021) does not provide specific parking standards for Houses in Multiple Occupation (HMOs), the parking requirements fall to Hillingdon Local Plan Part 2: Development Management Policies, Appendix C.

For a six person HMO, Local Plan standards require 3 on site parking spaces and 6 cycle parking spaces. The proposed development will have 1 onsite car parking space. Therefore, given the requirement for 3 on site parking spaces, the proposal results in a net shortfall that would displace parking demand for 2 vehicles onto the uncontrolled public highway.

Gledwood Avenue already experiences notable parking stress, with kerbside parking heavily utilised. The high number of existing vehicle crossovers further constrains capacity by removing substantial lengths of unrestricted kerbside space. As a result, any additional parking demand generated by the proposal is likely to intensify existing pressures and exacerbate localised parking stress. Furthermore, the applicant has not undertaken any formal parking stress survey to demonstrate whether spare kerbside capacity exists to accommodate the overspill parking generated by the development.

The submitted plans indicate the provision of 6 secure cycle spaces to be located within the rear garden. However, no detailed plans or specifications have been provided to demonstrate this. The side access, measured at approximately 0.85m within the red line boundary, falls significantly below the minimum 1.2m clear width required by the London Plan, the London Cycling Design Standards, and LTN 1/20 to allow a user to walk alongside and manoeuvre a cycle safely.

The Highway Authority have been consulted on the application and have concluded that the

development would result in an unacceptable increase in on-street parking demand and fails to provide complaint, accessible cycle parking, contrary to Policies DMT 6 of the Local Plan (2020) and Policies T6 and T5 of the London Plan (2021).

The proposed development, by reasons of its insufficient car parking provision, would lead to overspill parking on the public highways and therefore increased obstruction and vehicle conflict, resulting unacceptable highway safety risks. No parking stress survey has been submitted to demonstrate that local streets can accommodate this impact. Furthermore, the proposed cycle storage is unsuitable for a communal residential use, failing to provide inclusive, accessible and policy compliant facilities for all users. The combination of inadequate car parking and substandard cycle parking provision is contrary to Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan: Part Two (2020), Policies T4, T5 and T6 of the London Plan (2021), and Paragraph 116 of the NPPF (2024).

7.5 Urban Design, Access and Security Considerations

LIVING CONDITIONS FOR FUTURE OCCUPIERS:

INTERNAL AMENITY SPACE:

Paragraph 135f) of the National Planning Policy Framework (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.

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 D3 of the London Plan (2021) states that developments deliver appropriate outlook, privacy and amenity and achieve indoor and outdoor environments that are comfortable and inviting for people to use.

Policy D6 of the London Plan (2021) states that housing development should be of high quality design and provide adequately sized rooms. Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. Qualitative aspects of a development are key to ensuring successful sustainable housing. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.

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 proposal comprises a 6-bedroom (each with en-suite shower room) HMO with a communal kitchen. The internal room sizes are as follows:

BEDROOM 1 : 12.2m² + en-suite shower room
BEDROOM 2 : 7.50m² + en-suite shower room
BEDROOM 3 : 7.90m² + en-suite shower room

BEDROOM 4 : 14.3m² + en-suite shower room
BEDROOM 5 : 11.4m² + en-suite shower room
BEDROOM 6 : 19.0m² + en-suite shower room
KITCHEN : 15.6m²

The bedrooms would provide adequate space for single occupancy, and the size of the communal living room is considered acceptable in quantitative terms. However, significant qualitative concerns are raised in terms of the quality of the bedrooms 2 and 3 to the rear which have no outlook. Both bedrooms are served by a rear facing window and door which are obscure glazed. This would provide a very poor living environment to future occupiers of these rooms. The only communal space is also served by a single side facing window which looks over the shared driveway to the flank wall of the neighbouring property. The levels of light and outlook to this habitable space are therefore poor. Access to rooms 2 and 3 is also directly off the communal kitchen with residents being affected by the noise and disturbance associated with the only communal space.

This relationship represents a clear conflict with Policy D3 of the London Plan, which requires appropriate privacy and a comfortable living environment, and Policy DMH 5, which requires satisfactory living conditions for HMO residents. The qualitative harm arising here is substantial and cannot be mitigated through layout alone.

EXTERNAL AMENITY SPACE:

Whilst DMHB 18 does not set a specific standard for HMOs, it remains necessary to demonstrate that adequate external amenity can be provided to meet the needs of six independent adult occupiers.

The rear garden measures approximately 103sqm, which falls within the 100sqm benchmark for a dwelling of a comparable scale of occupation.

7.6 Other Issues

PRINCIPLE OF DEVELOPMENT

The Council adopted the Borough Wide Article 4 Direction on 12 December 2025 removing permitted development rights under Article 3, Schedule 2, Part 3, Class L.

The development site is currently in C3 use. The change of use from C3 to C4 therefore requires planning permission within the aforementioned Article 4 Direction in place.

Its conversion to a small HMO (C4 use) would be acceptable in principle subject to compliance with other relevant material considerations and policies.

Policy DMH 1 states:

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.

Paragraph 4.3 of the Local Plan provides guidance for the implementation of Policy DMH1 and

states 'In order to meet projected housing needs, the Council aims to resist the loss of residential accommodation within the Borough by means of Policy DMH 1: Safeguarding Existing Housing. For the purposes of this policy, residential accommodation includes Houses in Multiple Occupation (HMOs), student accommodation and other uses falling into Use Classes C3 and C4.'

Policy DMH 1 seeks to protect buildings in C3 and C4 use. As the building (subject of this application) would be going from C3 to C4 use there would be no loss of identified residential accommodation/housing stock.

Policy DMH 5 states:

B) In wards covered by an Article 4 Direction for HMOs Planning applications for the change of use from dwelling house (Use Class C3) to HMO (Use Class C4 and Sui Generis) will only be permitted:

- i) where it is in a neighbourhood area where less than 20% of properties are or would be exempt from paying council tax (or in the case of Conservation Areas 10%) because they are entirely occupied by full time students, recorded on the Council's database as a licensed HMO, benefit from C4/Sui Generis HMO planning consent and are known to the Council to be HMOs;
- ii) in Conservation Areas where less than 10% of properties are exempt from paying council tax because they are entirely occupied by full time students, recorded on the Council's database as a licensed HMO, benefit from C4/Sui Generis HMO planning consent and are known to the Council to be HMOs and the change of use does not form a consecutive HMO use in a street frontage;
- iii) where less than 15% of properties within 100 metres of a street length either side of an application property are exempt from paying council tax because they are entirely occupied by full time students, recorded on the Council's database as a licensed HMO, benefit from C4/Sui Generis HMO planning consent and are known to the Council to be HMOs; and
- iv) where the accommodation complies with all other planning standards relating to car parking, waste storage, retention of amenity space and garages and will not have a detrimental impact upon the residential amenity of adjoining properties.

From a review of the HMO register there are no registered HMO's within Gledwood Gardens and 2 licenced HMO properties in Balmoral Drive. As such, the proposal would not therefore result in a concentration of properties falling under an HMO use as defined under Policy DMH 5.

Notwithstanding this point it is important to note that the threshold for a license is 5 or more different individuals. Class L allows for properties to be converted from C3 to C4 without the requirement for planning permission. Although Class L pd rights have now been removed by the immediate article 4 direction there could have been properties converted to HMO's which did not require planning permission or a license therefore the Council will not have a record of them.

However, for the reasons discussed in the relevant sections of the report above, the proposal fails to comply with Policy DMH5 (iv) given that the accommodation would fail to comply with other planning standards relating to car parking and will have a detrimental impact upon the residential amenity of adjoining properties.

8. Reference Documents

Hillingdon Local Plan: Part 1 - Strategic Policies (2012)

Hillingdon Local Plan: Part 2 - Development Management Policies (2020)

London Plan (2021)

National Planning Policy Framework (2024)

Contact Officer:	Nicola Taplin	Telephone No:	01895 250230
-------------------------	---------------	----------------------	--------------