

DESIGN AND ACCESS STATEMENT

4 CHURCH CLOSE, WEST DRAYTON UB7 7PY

PROPOSAL: CONVERSION OF EXISTING 6 PEOPLE C4 HMO TO 7 PEOPLE SUI GENERIS HMO

APPLICANT: MR BEHAR HAFUZI



Date: Sept 2022 (Rev.1.0)

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1.0 INTRODUCTION

This document has been produced by OPS Chartered Surveyors on behalf of the applicant Mr Behar Hafuzi in support of the Planning Application for the conversion of the existing C4 HMO into 7 beds 7 people Sui Generis HMO (House in Multiple Occupation).

The purpose of this Design and Access Statement is to explain our assessment of the site parameters, how the brief for the project has been developed and how the scheme design will respond to these requirements. This document explains how the scheme design reflects the aspirations for a successful development that integrates into, and enhances, the setting of the existing area.

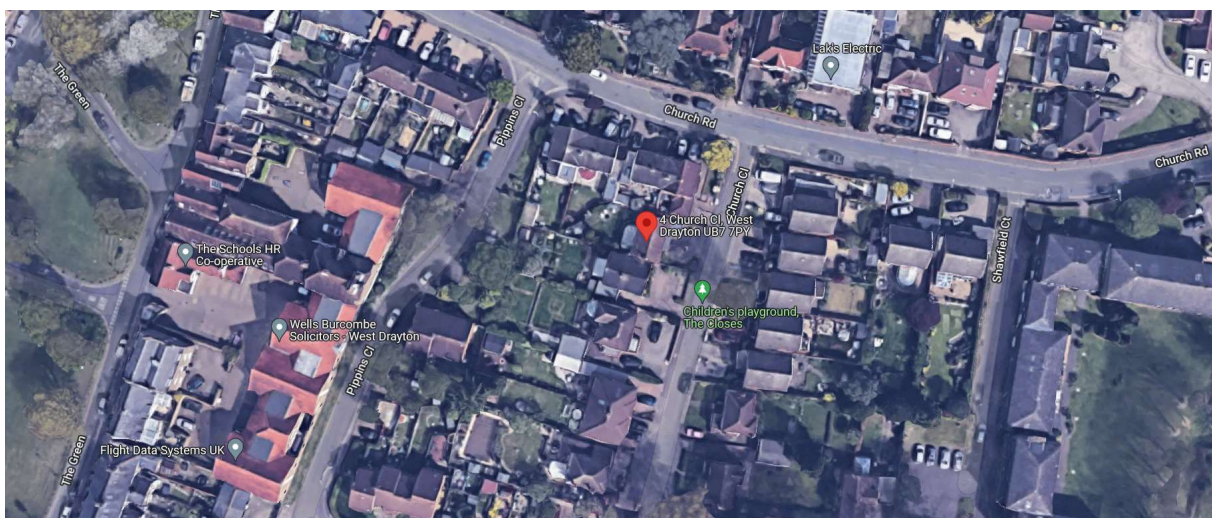
This Design and Access Statement should be read in conjunction with the planning application documents scheduled the following Appendices:

This Design and Access Statement should be read in conjunction with the following submissions:

- I) APPEX 1 - APPLICATION DRAWINGS
- ii) APPEX 2 - HMO MANAGEMENT SUPERVISION PLAN
- III) APPEX 3 - SITE SUPERVISION MANAGEMENT PLAN
- iv) APPEX 4 - APPEAL DECISION FOR 49 CENTRAL AVENUE, HAYES
- v) APPEX 5 - APPEAL PLANS FOR 49 CENTRAL AVENUE, HAYES
- VI) APPEX 6 - HILLINGDON HMO LICENSING TEAM EMAIL

SITE:

The application site comprises of an extended 2 storey detached dwelling situated on the western side of Church Close, West Drayton. It benefits from an existing large front driveway which can accommodate up to 4 cars and large rear garden of over 103sqm as shared amenity space for the future occupants.



The surrounding area is residential in character and is made up of a mix of detached and semi-detached dwellings that are set back from the adjacent highway.

The application site lies within the Developed Area as identified within the Hillingdon Local Plan - Saved UDP Policies (November 2012).

The proposed site is within a conservation area and is not listed or inside an Article 4 Direction Area.

The site is well connected to public transport and facilities with PTAL rating of 3. There are regular bus services at Station Road with a walking time of 7 mins from the application site. The bus service runs every 12mins to the nearest Uxbridge Town Centre with a travel time of 23 mins.

The application building is already in C4 HMO with 6 occupied tenants and HMO licence has been applied and pending for approval.

3.0 TRANSPORT ASSESSMENT

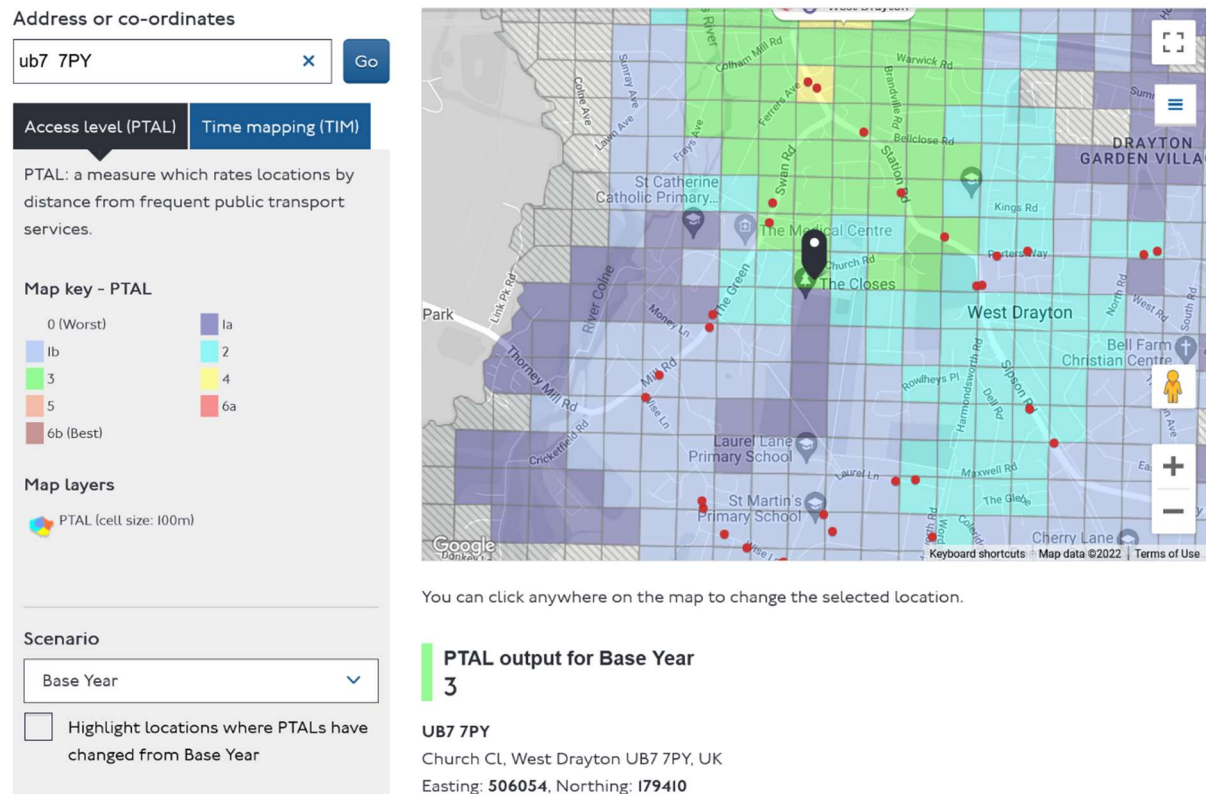


Figure 2: Shows PTAL rating for the proposed site and its surrounding areas.

The site has a PTAL rating of 3 as demonstrated by the PTAL figure above.

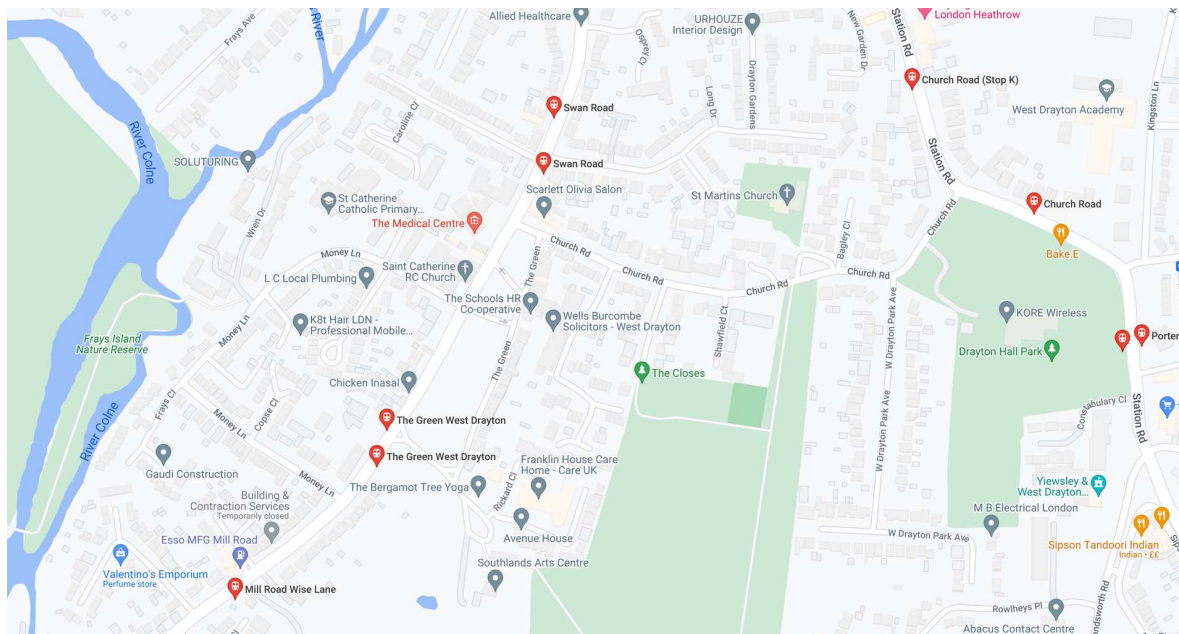


Figure 3: Shows bus stops near the proposed site and its surrounding areas.

The nearest bus stops are located along The Green and Swan Road which is only a few minutes walks from the proposed site. The cycle lanes form part of Cycle Route 89 on the London Cycle Network

and extend along High Street, Station Road and Horton Road etc to the neighbourhood area and other London boroughs.

As such, the site has a “good” PTAL rating which indicates convenient access to public transport and it is within a short walk and cycle distance of a designated town centre. The site’s location is therefore very accessible.

The proposed development comprises the conversion of the existing 6 beds 6 people C4 HMO into a 7 person/ 7 room HMO with existing vehicle crossover to Church to serve up to 4 car parking spaces. The development will also provide secure cycle parking.

The highway considerations for the proposed development relate to the following:

- Car parking provision

The Local Plan Development Management Policies and Site Allocations and Designations was adopted on 16th January 2020. It therefore pre-dates the London Plan 2021 and therefore the London Plan policies take precedence in determining planning applications.

London Plan Policy T6 provides the general policy approach to be taken in considering the car parking requirements for development proposals. The following criteria are particularly relevant to the current proposals:

A - Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.

B - Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’).

G - Where car parking is provided in new developments, provision should be made for infrastructure for electric or other.

Policy T6.1 provides details on the car parking requirements for residential developments. The following criteria are particularly relevant to the current proposals:

A New residential development should not exceed the maximum parking standards set out in Table 10.3.

C All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles.

E Large-scale purpose-built shared living, student accommodation and other sui generis residential uses should be car-free.

Criterion E states that sui generis residential uses should be car free. As part of the changes to the Use Classes Order in September 2020 Houses in Multiple Occupation now fall under the heading of sui generis. As such, a case can be made that the proposed 7 room HMO should be a car free development.

The proposals include the provision of 3 spaces and this is considered to represent a fair level of parking for the proposed use, notwithstanding the potential for it to be car free. The 3 parking spaces will both be provided with electric vehicle charging points in line with London Plan policy T6.1(C)

Table 10.2 of the London Plan sets out the minimum cycle parking requirements for developments. The required standard is 1 space per studio and this is similar to the proposed HMO use. As such, the development is required to provide cycle parking for 7 bicycles and this will be included within the rear amenity space.

The site has a PTAL rating of 3 and is well located to provide convenient pedestrian and cycle access to a wide range of facilities within Hayes developed area with close by retail parks. The site is therefore highly accessible and this should be reflected in the level of car parking required.

The level of car parking proposed reflects the requirements of the London Plan standards for a highly accessible location. Charging points for electric vehicles will be provided. The development will also provide secure cycle parking.

Overall, there are no highway related reasons why the development should not receive planning permission.

THE PROPOSAL:

Planning permission is sought for the change of use from the existing Class C4 6-bed HMO to 7-bed 7 people Sui Generis HMO with the following facilities proposed:

- approx. 103sqm shared amenity space area
- 1 large communal kitchen living & dining room
- 7 single en-suite bedrooms
- 4 parking spaces
- 8 secure cycle storage spaces
- 4 refuse storage bins

THE RELEVANT PLANNING POLICIES:

The Local Plan Part 2: Development Management Policies (adopted version 16 Jan 2020) states that:-

“4.13 Large homes in multiple occupation (HMOs) and hostels can contribute to the overall supply of cheaper accommodation, particularly for students, young people and those on low income.

4.14 Intensive occupation of former family dwellings such as those used for student accommodation or as a HMO can have negative impacts on residential amenity within an area through increases in on-street and off-street parking, loss of front gardens, reductions in levels of privacy, alterations to exterior of buildings and increased generation of refuse. There are significant concentrations of HMOs in the Uxbridge South and Brunel Ward, where an Article 4 Direction has been imposed removing permitted development rights for HMO accommodation.”

And under Policy DMH 5: HMO and Student Accommodation, the policy suggests that:-

A) In all parts of the Borough Proposals for the provision of large HMOs, residential hostels, student accommodation and secure accommodation will be required to demonstrate that:

- i) there is good accessibility to local amenities and public transport;*
- ii) they accord with the Accessible Homes standards and provide satisfactory living conditions for the intended occupiers; and*
- iii) there will be no adverse impact on the amenity of neighbouring properties or the character of the area.*

~~B) In wards covered by an Article 4 Direction for HMOs~~ **(NOT IN ARTICLE 4 AREA)**

~~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.~~

The following sections will discuss the proposal and demonstrate the proposal would meet the required policies, with evidence provided.

It is recognised paragraph 4.12 above that HMOs can contribute to the overall supply of cheaper accommodation, particularly for students, young people and those on low income. At the same time there may be concerns (under paragraph 4.12) regarding the conversion of dwellinghouse into HMO to the negative impact on residential amenity within an area through increases in:-

- i) on-street and off-street parking
- ii) loss of front gardens,
- iii) reductions in levels of privacy,
- iv) alterations to exterior of buildings and
- v) increased generation of refuse.

The proposal has been designed with care to mitigate the impact on the residential amenity within the area by:

- i) providing 3 off street parking spaces and secure storage for 8 bicycles in the rear garage, to meet the London Plan and Local Policy;
- ii) maintaining the existing boundary treatment to the rear garden to keep high level of privacy as before;
- iii) retaining the exterior of the building in the same condition without external alterations and
- iv) providing 4 new refuse storage bins to improve the refuse storage situation for the proposed HMO use, this would meet both the planning policy and HMO regulations.

It is considered that the above steps would mitigate the impact on proposed HMO use through reasonable and responsible measurements and approaches.

DEVELOPMENT DENSITY AND AMENITY PROVISION:

Although the previous SPG for HMO 2004 has been replaced by the latest Local Plan Part 2 and there is no suggestion of living space requirement for HMO conversion within the latest Local Plan. In terms of intensification of the property, paragraph 3.9 of the SPG HMO 2004 suggests that proposals for conversions from a semi-detached house to a HMO will be required to retain at least one ground floor habitable room over 10sq.m, other than a kitchen, for communal living purposes.

In relation to private amenity space, the previous SPG HMO advises that a minimum of 15sq.m of private usable amenity space per habitable room (excluding those used for communal living purposes) is required.

The latest Policy DMH paragraphs 5.68-5.69 suggest that there should be sufficient private outdoor amenity space for the occupants.

The proposal would provide 7 bedrooms with 103sq.m of private amenity space. This combination would provide excellent the living condition & amenity space for the future occupants.

The following table provides a comparison between the proposed figures and those set out by council's local plan part 2:

<u>LOCAL PLAN / SPG REQUIREMENT</u>	<u>MIN. REQUIREMENT</u>	<u>PROPOSAL</u>	<u>COMP.</u>
Communal living space (SPG) HMO kitchen space standard	10sqm 6.5sqm	Combined Area 18.5sqm	✓
Amenity space	100sqm for 4+bedrooms house	103sqm	✓
Bedroom space	6.51sqm Single 10.22sqm Double	9.3/9.5/9.7/9.8/10.3/12/12.3(sqm) (All single room use)	✓
Table 1(b) - HMO Car parking Cycle	1 space per 2 occupants 1 per occupant	3 spaces for 7 occupants 7 per 7 occupants	✓ ✓
Concentration of HMO in the area. (*) DMH 5(B)(i): Less than 20% within the neighbourhood DMH 5(B)(ii): Less than 10% within a conservation area DMH 5(B)(iii): Less than 15% within 100m of a street length	20% Not in C.A., hence not applicable. 15%	XX% registered HMO within the neighbourhood or within 100m of a street length. (Data source: from Hillingdon HMO Register)	✓

*Research Data:

In connection with Policy DMH 5(B)(iv) relating to car parking, waste storage, retention of amenity space and garages, the above paragraphs together proposed drawings have demonstrated that the proposal would meet these planning standards.

LIVING CONDITIONS FOR FUTURE OCCUPIERS

The proposal development would incorporate two supervision plans to ensure the proposal development would not have detrimental impact upon the residential amenity of adjoining properties and living conditions of adjoining occupants:-

- 1) HMO Management Supervision Plan
- 2) Site Supervision Management Plan

Upon the implementation of the HMO Management Supervision Plan & Site Supervision Management Plan with strict rules to ensure the HMO is being operated in full compliance of all the regulations including separate regulation under the Housing Act 2004: Mandatory HMO Licensing law. The above steps would ensure there should be no impact on neighbourhood.

Also attached with this application is an appeal application for the Change of Use from 6B6P C4 HMO to a 7B8P C4 HMO in similar situation where some of the bedrooms are more than capable of being use as a double bedroom for 2 people. The inspector confirmed that through the use of planning condition restricting the total number of occupants would be acceptable for this type of change of use application.

IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA:

The proposal will not have a negative impact on the character and appearance of the area, as there would be no external alteration to the building. The current proposal will maintain the existing garden space with a significant increase in the amount of soft landscaping to site.

Local plan policy states that development will not be permitted if the layout and appearance fail to harmonise with the existing street scene or other features of the area which the Local Authority considers it desirable to retain or enhance. The policy also seeks to ensure that development will complement the amenity and character of the residential area in which it is situated. In assessing planning applications for HMO's, the Council will seek to ensure that the change of use will not be detrimental to the residential amenity of the area.

The Supplementary Planning Guidance on House in Multiple Occupation and other non-self containing housing (August 2004) states that established residential streets derive part of their character from having enclosed and planted front gardens.

In assessing applications for HMO's, the Council will seek to ensure that the change of use will not be detrimental to the residential amenity of the area, including whether the dwelling is large enough and that any increase in the number of residents will not have an adverse impact on noise levels and the level of amenity neighbouring residents can reasonably be expected to enjoy.

The SPG HMO 2004 suggests that for detached properties, the maximum HMO occupancy is 10 people, although the newly adopted Local Plan Part 2 has not specified the maximum number of

people, as the current proposal is for up to a maximum of 7 people this would not exceed any of the policies or guideline adopted by the authority.

The current proposal comprises a large communal living & dining room which is an added benefit to house and occupiers whereas most of the Class C4 HMO do not have such facility because it is not a legal requirement for HMO set up to have large open plan kitchen, living and dining rooms. The current proposal would meet the HMO sanitary requirement ratio of 2 (shower/bath) +1 (wc) for up to 10 persons.

TRANSPORTATION & PARKING

The proposal has include up to 3 off street parking and 8 secure cycle spaces to meet the Local Plan Part 2 requirements. (Table below extracted from LP Pt2 – page 152)

London Borough of Hillingdon	
Local Plan Part 2 - Development Management Policies	
152	
DWELLINGS WITH CURTILAGE	
2 spaces per dwelling	(a) 1 per 1 or 2 bed unit. (b) 2 per 3 or more bed unit
FLATS	
3 - 4 or more bedrooms - 2 spaces per unit 1 – 2 bedrooms - 1.5 - 1 spaces per unit Studio - 1 space per 2 units (a) Proposals must also accommodate visitor's car parking on-site additional to the above (b) Car parks must be allocated to dwellings.	(a) 1 per studio, 1 or 2 bed unit. (b) 2 per 3 or more bed unit.
HOSTELS	
1 space per manager plus 1 space per 20 resident bed spaces. Variance to this may be permitted, subject to a transport appraisal and travel plan.	Level of provision subject to appraisal.
HOUSES IN MULTIPLE OCCUPATION	
For a HMO with up to 6 occupants: 1 space per 2 occupants. For HMOs over 6 occupants, car parking requirements will be assessed through a transport appraisal and travel plan.	1 per occupant

REFUSE STORAGE

The proposal would provide 4 x 240L wheelie bins with permanent enclosure, located to the front of the property. All refuse collection to be arranged based on the council's collection schedules.

CONCLUSION

The government encourages local planning authorities to help maintain balanced communities. A balanced community is defined as one that is not dominated by one particular household type, size or tenure. There is no possibility of a sustainable community without an appropriate balance between settled residents and a transient population. The key issue with imbalance in neighbourhoods, which the government has recognised, is that it leads to rising problems and declining community, and potentially to unsustainability.

It should be recognised that HMOs are an important element of the borough's housing stock and it is not the aim of the policy to reduce their overall numbers. Shared and/or rented housing fulfils a need for students and residents other than students, especially at the lower cost end of the housing market.

It is clear from the comparison table above that the site is not located in a high HMO concentration area and the proposal has adopted the council's current policy and HMO standards to meet the strict requirements for both planning and housing purpose, the conversion should therefore be considered acceptable to the LPA based on the above information provided.

- END OF STATEMENT -