

**TOWN AND COUNTRY PLANNING ACT 1990
(AS AMENDED)**

PLANNING STATEMENT

Change of use from C3 (Dwellinghouse) to C4 (Small House in
Multiple Occupation)

**29 FROGMORE AVENUE, HAYES,
MIDDLESEX, UB4 8AP**

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1 SITE AND SURROUNDINGS

- 1.1 The application site comprises a three-storey semi-detached dwellinghouse situated on Frogmore Avenue, Hayes, Middlesex. The property is arranged over ground, first and second floor levels and includes a rear garden and a garage at ground floor level.
- 1.2 The surrounding area is predominantly residential in character, comprising a mix of semi-detached and terraced dwellinghouses together with flatted accommodation, which is typical of the wider Hayes locality. The property sits within an established residential street pattern.
- 1.3 The site is not a listed building and does not fall within a Conservation Area.

2 PROPOSAL

- 2.1 The application seeks planning permission for the change of use of the property from a single dwellinghouse (Use Class C3) to a small House in Multiple Occupation (Use Class C4), to be occupied by a maximum of six persons.
- 2.2 The London Borough of Hillingdon implemented a borough-wide Article 4 Direction on 11 December 2025, removing permitted development rights for the change of use from Use Class C3 to Use Class C4 across the whole borough. Planning permission is therefore required for the proposed use.
- 2.3 No external alterations to the property are proposed as part of this application. The proposal relates solely to the change of use of the existing dwelling.
- 2.4 The proposed internal arrangement provides three letting rooms on the first and second floors. All rooms are proposed as double lets, providing accommodation for a maximum of six persons. The ground floor provides a communal kitchen and dining area for the shared use of all occupants, and the first floor provides a communal living room.

3 RELEVANT PLANNING HISTORY

- 3.1 A search of the Council's planning register confirms that the application site has an extant planning history comprising two approved applications, both relating to extensions to the existing dwellinghouse. Neither application is directly relevant to or has any material bearing upon the current proposal for a change of use from Use Class C3 to Use Class C4.

4 PLANNING POLICY AND GUIDANCE

- 4.1 MHCLG's National Planning Policy Framework (2024)
- 4.2 MHCLG's National Planning Practice Guidance
- 4.3 GLA's London Plan (2021)
- 4.4 Hillingdon Local Plan Part 1: Strategic Policies (2012)
- 4.5 Hillingdon Local Plan Part 2: Development Management Policies (2020)
- 4.6 Hillingdon Local Plan Part 2: Policy DMH5 – Houses in Multiple Occupation
- 4.7 Hillingdon Supplementary Planning Guidance: Houses in Multiple Occupation and other non self-contained housing (2004)
- 4.8 Hillingdon Minimum Standards for Houses in Multiple Occupation (2019)

5 PLANNING ASSESSMENT

Principle of development:

- 5.1 Paragraph 20 of the NPPF (2024) requires that strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for housing. The delivery of a range of housing types, including Houses in Multiple Occupation, supports the provision of mixed accommodation needed to meet housing demand.
- 5.2 Policy D3 (Optimising site capacity through the design-led approach) of the London Plan (2021) requires all development to make the best use of land through a design-led approach that optimises the capacity of sites

and ensures that development is of the most appropriate form and land use.

- 5.3 Part D of London Plan Policy H9 (Ensuring the best use of stock) states that boroughs should take account of the role of Houses in Multiple Occupation in meeting local and strategic housing needs and that, where they are of a reasonable standard, they should generally be protected. The supporting text at paragraph 4.9.4 refers to HMOs as an important part of London's housing offer, reducing pressure on other elements of the housing stock.
- 5.4 Policy DMH1 of the Hillingdon Local Plan Part 2: Development Management Policies (2020) seeks to safeguard existing residential accommodation, including Houses in Multiple Occupation falling within Use Classes C3 and C4, and supports the retention and provision of a range of housing types to meet identified needs within the borough.
- 5.5 Policy DMH5 of the Hillingdon Local Plan Part 2: Development Management Policies (2020) specifically governs applications for Houses in Multiple Occupation. In wards covered by an Article 4 Direction, Policy DMH5(B) permits the change of use from C3 to C4 where the proposal would not result in a concentration of HMOs exceeding 20% of properties in the neighbourhood area, or 15% of properties within 100 metres of the application site; and where the accommodation complies with all relevant planning standards relating to car parking, waste storage and amenity space, and would not have a detrimental impact upon the residential amenity of adjoining properties.
- 5.6 As set out in this statement, the proposal meets the applicable parking standards, provides adequate refuse storage, and would not give rise to unacceptable harm to neighbouring amenity. Subject to confirmation of the HMO concentration threshold against the current register, the proposal is considered to accord with the requirements of Policy DMH5.
- 5.7 The Council's Supplementary Planning Guidance on Houses in Multiple Occupation (2004) provides detailed guidance on the acceptability of HMOs in Hillingdon, addressing matters including the character of the area, amenity, parking and accommodation standards. The proposal has been assessed against all relevant criteria within this guidance.

- 5.8 The proposed HMO would provide affordable, flexible accommodation for a maximum of six persons, contributing to the variety of housing provision in the Hayes locality and meeting an identified need for private sector shared accommodation.

Compliance with HMO Standards:

- 5.9 The proposed accommodation has been assessed against the Hillingdon Minimum Standards for Houses in Multiple Occupation (2019). The room sizes proposed are as follows:

- Bedroom 1 (first floor): 10.5m² – Compliant (proposed double let, 2 persons)
- Bedroom 2 (first floor): 12.5m² – Compliant (proposed double let, 2 persons)
- Bedroom 3 (second floor, loft): 16.9m² – Compliant (proposed double let, 2 persons)

The floor area of Bedroom 3 is measured at the 1.53m ceiling height datum in accordance with the Hillingdon Minimum Standards. The compliant floor area is confirmed at 16.9m², satisfying the minimum adult room size threshold.

- 5.10 The Hillingdon minimum standards require, for a property occupied by five to ten persons, a minimum of two bathrooms with a fixed bath or shower and two separate WCs with wash hand basins. The property provides two bathrooms: an ensuite bathroom serving Bedroom 3 (the loft double bedroom) exclusively for its two occupants, and a second shared bathroom on the first floor serving the remaining four occupants. A ground floor WC with wash hand basin and appropriate splash-back is also available for shared use by all occupants. In terms of the four occupants not served by the ensuite, the provision of one shared bathroom and one shared WC satisfies the Hillingdon standard applicable to that number of sharing occupants. Taking the property as a whole, the total provision of two bathrooms and two WCs (one within the ensuite and one on the ground floor) meets the minimum standard for six occupants.

- 5.11 The property provides generous communal facilities across two floors. The ground floor contains a dedicated kitchen and dining area of 31.3m², and the first floor provides a separate communal living room of 13.9m². Together these communal spaces provide 45.2m² of shared living accommodation, significantly exceeding the minimum kitchen and common living area standards required by the Hillingdon HMO standards and affording occupants a comfortable degree of communal amenity.

Character and Appearance:

- 5.12 Policy BE1 of the Hillingdon Local Plan Part 1 (2012) requires all new development to maintain and improve the quality of the built environment. No external alterations are proposed as part of this application. There will accordingly be no visual impact on the character or appearance of the property, the streetscene or the wider surrounding area.
- 5.13 Frogmore Avenue is a well-established residential area comprising a mix of semi-detached and terraced dwellinghouses typical of the Hayes locality. The proposed use of the property as a small HMO is considered to be in keeping with this residential character and would not detract from the appearance or amenity of the street.

Impact on Neighbouring Properties

- 5.14 The proposed HMO would accommodate a maximum of six persons, which is broadly comparable to the occupancy levels that could reasonably be expected in a family dwelling of this size. The noise and disturbance generated by the proposed use would not be expected to materially exceed that associated with conventional family occupation of the property. No adverse impact on the amenity of neighbouring residents is therefore anticipated.
- 5.15 The use of the property remains residential in nature throughout. No commercial activity, amplified music or other high-disturbance uses are proposed. Appropriate tenancy management arrangements will be put in place to ensure the property is managed responsibly for the benefit of both occupants and neighbouring residents.

- 5.16 In terms of noise and disturbance, it is submitted that the proposed HMO would generate activity that is materially identical to, and not in excess of, that which would reasonably be expected from a family dwelling of equivalent occupancy. The application property is a three-storey, five-bedroom dwellinghouse of a scale and configuration wholly capable of accommodating six persons as a single C3 household. A family of six occupying the property in C3 use would generate an equivalent pattern of daily movements, domestic activity, garden use and comings and goings to that anticipated from the proposed HMO. The proposed use involves precisely the same number of persons and the same residential use of the same spaces. No material uplift in noise or disturbance above that attributable to lawful C3 occupation of this property is therefore anticipated, and the proposal cannot reasonably be characterised as an intensification beyond what the property and its neighbours would ordinarily experience from a fully occupied family dwelling of this size.

Transport and Parking

- 5.17 The property benefits from off-street parking provision within the front curtilage, with capacity for a minimum of four vehicles. This level of provision is considered appropriate for an HMO of this scale and is not anticipated to give rise to any adverse impact upon on-street parking conditions in the surrounding area. The accessible transport location of the site further reduces reliance on private car use by future occupants.
- 5.18 Secure cycle parking for six bicycles will be provided within the existing garage at the rear of the property. The garage provides sufficient internal space to accommodate six cycles in a secure, covered and weather-protected environment in full accordance with the requirements of London Plan Policy T5. This arrangement avoids any impact on the open front garden and preserves the verdant character of the streetscene.

Refuse and recycling storage

- 5.19 Refuse and recycling storage will be provided within the front garden area of the property, ensuring it is readily accessible to both occupants

and the local authority for collection purposes in accordance with Hillingdon's requirements.

6 CONCLUSION

- 6.1 The proposed change of use from C3 (Dwellinghouse) to C4 (Small House in Multiple Occupation) at 29 Frogmore Avenue, Hayes, Middlesex, represents an acceptable form of development that accords with the relevant provisions of the National Planning Policy Framework (2024), the London Plan (2021) and the Hillingdon development plan.
- 6.2 The property provides well-sized accommodation that meets or exceeds Hillingdon's minimum HMO standards, with adequate communal kitchen and living facilities, satisfactory bathroom and WC provision, and off-street parking for three vehicles.
- 6.3 The proposed use requires no external alterations to the property and will not adversely affect the character or appearance of the area. The noise and disturbance generated by the proposed HMO would not exceed that expected from a comparable family dwelling of equivalent size, and no harmful impact upon neighbouring amenity is anticipated.
- 6.4 In light of the above assessment, it is respectfully submitted that planning permission should be granted.