Development Management

APP REF No. 11329/APP/2025/2073

DELEGATED DECISION

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

	APPROVAL RECOMMENDED: GENERAL	Select an Option
1.	No valid planning application objection in the form of a petition of 20 or more signatures, has been received	☐
2.	Application complies with all relevant planning policies and is acceptable on planning grounds	☐
3.	There is no Committee resolution for the enforcement action	☐
4.	There is no effect on listed buildings or their settings	☐
5.	The site is not in the Green Belt (but see 11 below)	☐
	REFUSAL RECOMMENDED: GENERAL	
6.	Application is contrary to relevant planning policies/standards	☐
7.	No petition of 20 or more signatures has been received	☐
8.	Application has not been supported independently by a person/s	☐
9.	The site is not in Green Belt (but see 11 below)	☐
	RESIDENTIAL DEVELOPMENT	
10.	Single dwelling or less than 10 dwelling units and/or a site of less than 0.5 ha	☐
11.	Householder application in the Green Belt	☐
	COMMERCIAL, INDUSTRIAL AND RETAIL DEVELOPMENT	
12.	Change of use of retail units on site less than 1 ha or with less than 1000 sq. m other than a change involving a loss of A1 uses	☐
13.	Refusal of change of use from retail class A1 to any other use	☐
14.	Change of use of industrial units on site less than 1 ha or with less than 1000sq.m. of floor space other than to a retail use.	☐
	CERTIFICATE OF LAWFULNESS	
15.	Certificate of Lawfulness (for proposed use or Development)	☐
16.	Certificate of Lawfulness (for existing use or Development)	☐
17.	Certificate of Appropriate Alternative Development	☐
	CERTIFICATE OF LAWFULNESS	
18.	ADVERTISMENT CONSENT (excluding Hoardings)	☐
19.	PRIOR APPROVAL APPLICATION	☐
20.	OUT-OF-BOROUGH OBSERVATIONS	☐
21.	CIRCULAR 18/84 APPLICATION	☐
22.	CORPSEWOOD COVENANT APPLICATION	☐
23.	APPROVAL OF DETAILS	☐
24.	ANCILLARY PLANNING AGREEMENT (S.106 or S.278) where the Heads of Terms have already received Committee approval	☐
25.	WORKS TO TREES	☐
26.	OTHER (please specify)	☐

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

Case Officer:

Signature:

Date:

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

Team Manager:

Signature:

Date:

The decision notice for this application can be issued.

Director / Member of Senior Management Team:

Signature:

Date:

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

A

Item No.	**Report of the Head of Development Management and Building Control**
Address:	54 BRIDGWATER ROAD RUISLIP
Development:	Change of use from a Class C4 small HMO to an 8-person Sui Generis large HMO including erection of a first floor rear extension with amendments to fenestration and associated alterations (revised description 15.08.25)
LBH Ref Nos:	**11329/APP/2025/2073**
Drawing Nos:	EXL-001, EX-P001-3, EX-E001-3, EX-PE001EX-S001 PR-L001, PR-P001-3, PR-S001, PR-E001-3,PR-PE001 Site plan HMO Management Plan Lambeth Parking Survey undertaken 23-24 July 25 Waste Management Plan Transport and Travel Plan - 20 October 2025 Transport Statement dated 24 July 2025 Fire Statement Planning Statement
Date Plans received:	01-08-25 **Date(s) of Amendments(s):**
Date Application valid	01-08-25

1. SUMMARY

The application seeks planning permission for the change of use of an existing dwellinghouse to an eight-person House in Multiple Occupation (HMO) (Sui Generis), together with associated internal alterations and a first-floor rear extension.

At the time of assessment, the property was vacant and no evidence has been submitted to demonstrate lawful occupation as a small HMO (Use Class C4). The application has therefore been assessed as a proposed change of use from a dwellinghouse (Use Class C3) to a Sui Generis HMO. The proposal has been considered in the context of the immediate Article 4 Direction relating to HMOs, which came into effect on 11 December 2025.

The internal layout has been revised since the previously refused scheme and is considered to be capable of providing acceptable living conditions for future occupiers, subject to conditions. No objection is raised in respect of internal amenity, external amenity space, neighbour amenity or highways impacts.

However, the proposal would result in the permanent loss of a dwelling capable of functioning as a family-sized home, for which there is an identified borough-wide need. In view of recent evidence

which underpins the Article 4 Direction, the development is considered harmful, contrary to the needs of the borough and is not supported in principle.

Furthermore, the proposed first floor rear extension to the dwelling by reason of the creation of a flat roof at first floor level would be considered poor design that would result in harm to the character and appearance of the dwelling and wider area as viewed from Bridgwater Road Fields.

The harm posed in respect of family housing and the harm to the character and appearance of the area accumulate to weigh against the scheme in the planning balance. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For the reasons outlined within the main body of the report, the accumulation of identified conflicts with the development plan are considered to amount to be significant and there are no material considerations to sufficiently outweigh such planning policy conflict. Accordingly the application is recommended for refusal.

2. RECOMMENDATION

REFUSAL for the following reasons:

1. NON2 Reason for Refusal 1 - Principle of Development

The proposed change of use would result in the loss of a dwellinghouse capable of functioning as a family-sized home, for which there is an identified and ongoing need within the Borough. At the time of assessment, the lawful use of the property is considered to remain as a dwellinghouse (Use Class C3), and the proposed development would permanently remove its ability to contribute to the supply of family housing. Notwithstanding this, if the property was lawful as Use Class C4, the proposed change to a Sui Generis HMO would still result in the loss of a property with the realistic capability of reverting to family use without the need for planning permission. The proposal is therefore not supported in principle and is contrary to Policies DMH 2 and DMH 5 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policies H9 and H10 of the London Plan (2021), and the objectives of Chapter 5 of the National Planning Policy Framework (2024).

2. NON2 Reason for Refusal 2 - Planning Balance

Character and Appearance: The proposed first floor rear extension to the dwelling by reason of the creation of a flat roof at first floor level would be considered poor design that would result in harm to the character and appearance of the dwelling and wider area as viewed from Bridgwater Road Fields.

Whilst not standalone reason for refusal, the harm posed in respect of Principle of Development (Reason for Refusal 1) and harm to character and appearance accumulate to weigh against the scheme in the planning balance. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For the reasons outlined within the main body of the report, the accumulation of identified conflicts with the development plan are considered to amount to be significant and there are no material considerations to outweigh such planning policy conflict. Accordingly the application is recommended for refusal.

INFORMATIVES

1. I71 LBH worked applicant in a positive & proactive (Refusing)

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from the Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service.We have however been unable to seek solutions to problems arising from the application as the principal of the proposal is clearly contrary to our statutory policies and negotiation could not overcome the reasons for refusal.

2. 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.

DMH 1 Safeguarding Existing Housing

DMH 2 Housing Mix

DMH 4 Residential Conversions and Redevelopment

DMH 5 Houses in Multiple Occupation

DMHB 11 Design of New Development

DMHB 16 Housing Standards

DMHB 18 Private Outdoor Amenity Space

DMT 1 Managing Transport Impacts

DMT 2 Highways Impacts

DMT 5 Pedestrians and Cyclists

DMT 6 Vehicle Parking

LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D6	(2021) Housing quality and standards
LPP H9	(2021) Ensuring the best use of stock
LPP H10	(2021) Housing size mix
LPP D14	(2021) Noise
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF4 -24	NPPF4 2024 - Decision making
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes
NPPF8 -24	NPPF8 2024 - Promoting healthy and safe communities
NPPF9 -24	NPPF9 2024 - Promoting sustainable transport

3. CONSIDERATIONS

3.1 Site and Locality

The application site comprises a two storey end of terrace dwelling located on the westerly side of Bridgwater Road, Ruislip. The application site benefits an area of hardstanding to the front for off street parking and a rear garden.

The surrounding area is predominantly residential in character. Number 52 Bridgwater Road is located to the north of the application and Number 56 Bridgwater Road is located to the south of the application site and forms the adjoining terrace.

The application site does not lie within a Conservation Area, nor an Area or Special Local Character. There are no Listed Buildings within the site and the site does not lie within a Surface Water Flood Zone or Critical Drainage Area. The application site is not subject to a Tree Preservation Order. The site has a Public Transport Accessibility Level rating of 2 (Poor).

3.2 Proposed Scheme

The application seeks planning permission for the change of use of the property to an eight-person House in Multiple Occupation (HMO) (Sui Generis), together with a first floor rear extension and associated internal alterations. The submitted description of development refers to the existing use of the property as a small HMO (Use Class C4).

During the course of the application, officers advised the applicant that, based on the available evidence and the findings of the officer site visit, the lawful existing use of the property could not be confirmed as Use Class C4. Officers therefore requested that the description of development be amended to reflect a proposed change of use from a dwellinghouse (Use Class C3) to a Sui Generis HMO. The applicant declined to amend the description and maintained that the property was in Use Class C4.

Notwithstanding the description submitted by the applicant, the lawful planning use of a property is determined by its actual occupation rather than its internal layout or intended use. A material change of use to Use Class C4 only occurs when a dwelling is occupied by between three and six unrelated individuals living together as separate households.

An officer site visit undertaken on 9 December 2025 confirmed that the property was vacant at that time, with no tenants in situ. While the applicant subsequently advised that three individuals were due to move into the property on 10 December 2025, no evidence has been submitted to demonstrate that such occupation occurred. In the absence of evidence of lawful occupation as a small HMO prior to the Council's Immediate Article 4 Direction coming into effect on 11 December 2025, officers consider that the lawful use of the property at the time of assessment remains as a dwellinghouse (Use Class C3).

Accordingly, for the purposes of this assessment, the application has been considered as proposing a change of use from a dwellinghouse (Use Class C3) to an eight-person House in Multiple Occupation (Sui Generis), irrespective of the description of development submitted by the applicant.

3.3 Relevant Planning History

11329/APP/2025/202 54 BRIDGWATER ROAD RUISLIP

Conversion of roof space to habitable use to include a rear dormer, conversion of roof from hip to gable end and removal of chimney stack (Application for a Certificate of Lawful Development for a Proposed Development)

Decision: 21-03-2025 Refusal

11329/PRC/2025/65 54 BRIDGWATER ROAD RUISLIP

Change of use from Small HMO (Class C4) to Large HMO (Sui Generis)

Decision: 17-07-2025 Objection

11329/APP/2025/149 54 BRIDGWATER ROAD RUISLIP

Change of use from a Class C4 (Small HMO) to a Sui Generis (Large HMO) for 8 people with the erection of a first floor side and rear extension.

Decision: 01-04-2025 Refusal

Comment on Planning History

See 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

Public Consultation

The application was publicised by way of neighbour notification letters sent on 15 August 2025, and display of a site notice on 27 August 2025. All forms of consultation expired on 18 September 2025. In addition, the South Ruislip Residents' Association was consulted.

A total of 37 representations were received from neighbouring residents objecting to the proposal. The main points raised within the objections can be summarised below:

(1) Concerns about the introduction of a large HMO within a predominantly family residential street
(2) Loss of a family home / family-sized accommodation within the Borough
(3) Concerns that the application is misleading regarding the existing use, with residents disputing that the property is currently in lawful C4 use
(4) Concerns about the proposal being out of keeping with the character of the street / setting a precedent for other HMOs in the area
(5) Increase in noise and disturbance to neighbouring occupiers arising from additional comings and goings
(6) Concerns about anti-social behaviour and residents' safety, including reference to past disturbance associated with previous occupiers
(7) Increase in traffic movements and congestion on the local road network
(8) Increased demand for on-street parking, with objectors stating that the street already experiences parking stress (including commuter parking) and that car ownership cannot be controlled
(9) Concerns regarding the adequacy and practicality of the on-plot parking arrangement shown on the plans, including whether spaces are to scale and whether parking could obstruct access/escape routes
(10) Concerns about the suitability/quality of accommodation for eight occupants, including insufficient communal space and potential overcrowding
(11) Concerns about waste storage capacity and increased refuse generation associated with the proposed occupancy level
(12) Concerns about pressure on local infrastructure/services, including drainage/sewer capacity and water services
(13) Concerns regarding security, including the rear service alleyway/gated access and the distribution of keys given the potential turnover of tenants
(14) Concerns regarding fire safety and general safety associated with higher intensity occupation
(15) Concerns regarding the proposed first-floor rear extension, including structural impacts, foundations and potential damage to adjoining properties
(16) Concerns about the proximity of a school and that the dwelling should be retained as family accommodation

Petition

A petition objecting to the proposal was received, containing 65 signatures.

The petition raises the following key concerns:

- The property is located on a residential street and is not appropriate for use as a large HMO.

- The increased capacity of the dwelling would result in the loss of a family home.

- The proposal would lead to increased traffic, parking demand and pressure on on-street parking.

- The intensification of use would introduce adverse impacts associated with high-density residential accommodation, to the detriment of neighbouring residents.

- The issues raised within the petition have been taken into account as part of the overall assessment of the proposal

Ward Councillor Representation:

The proposed application is a gross overdevelopment of the existing site, and its scale and mass would not be in keeping with the existing street scene and neighbouring properties. Bridgwater Road is made up of residential family homes and it is important to retain these, in keeping with the make up of the road. This has successfully been achieved with the Council rejecting an application to convert a property to multiple flats at number 79 on the opposite side of the road; a decision that was supported by the Planning Inspectorate.

The application for number 54 fails to provide anywhere near the adequate number of off street parking spaces - offering just one space for eight different occupants. Bridgwater Road already suffers from a high concentration of on street parking given its close proximity to Ruislip Gardens station and is also used as a cut through between West End Road and Victoria Road. This inadequate provision of off street parking will only increase the existing challenge of on street parking that existing residents have.

Furthermore, having 8 unrelated individuals or couples in one property will significantly increase the number of movements into and out of the property. This will undoubtably cause a detrimental impact on those living close to the property, either side and opposite. The experience would be very different to that of a family home where the expectation would be that the family unit enter and exit together. Here the movements will be multiplied greatly and likely to occur at anti-social hours as well, causing further disruption and negativity for those impacted.

Overall, this application is a gross overdevelopment, not what the road needs, does not complement the existing property make up and would have a detrimental impact on the residents living adjacent to it and on the road in general given the broader issues I have identified. I trust that planning officers will take these points, and the views of local residents into consideration and refuse this inappropriate application.

Planning Officer comment:

All material considerations will be discussed below in the main report.

Internal Consultees
Highways

The Council's Highway Authority was consulted on the application.

Initial comments raised concerns in relation to the sustainability of the site, the limited on-plot parking provision, and the potential for increased on-street parking demand arising from the proposed increase in occupancy. The Highway Authority requested the submission of additional transport information, including a Travel Plan.

During the course of the application, the applicant submitted a Travel Plan and supporting transport information. Following review of the additional information, the Highway Authority confirmed that it raised no objection to the proposal, subject to the implementation of the submitted Travel Plan.

The Highway Authority is satisfied that, on balance, the proposal would not result in an unacceptable impact on highway safety or the operation of the local road network. These matters are addressed in further detail within the Highways section of this report.

Access

The Council's Access Officer has reviewed the application and raised no objection. The proposal would not result in the loss of accessible housing stock, and the existing dwelling predates the application of current accessible housing standards. The development is therefore considered acceptable in access terms.

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
PT1.H1	(2012) Housing Growth
PT1.EM8	(2012) Land, Water, Air and Noise

Part 2 Polices:

DMH 1	Safeguarding Existing Housing
DMH 2	Housing Mix
DMH 4	Residential Conversions and Redevelopment
DMH 5	Houses in Multiple Occupation
DMHB 11	Design of New Development
DMHB 16	Housing Standards
DMHB 18	Private Outdoor Amenity Space
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists

DMT 6	Vehicle Parking
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D6	(2021) Housing quality and standards
LPP H9	(2021) Ensuring the best use of stock
LPP H10	(2021) Housing size mix
LPP D14	(2021) Noise
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF4 -24	NPPF4 2024 - Decision making
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes
NPPF8 -24	NPPF8 2024 - Promoting healthy and safe communities
NPPF9 -24	NPPF9 2024 - Promoting sustainable transport

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

a detrimental impact upon the residential amenity of adjoining properties.

Paragraph 135 (f) of the NPPF (2024) states that planning policies and decisions should ensure that developments; create places that are safe, inclusive and accessible and which promote health and wellbeing, 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.

Policy D14 of the London Plan (2021) requires that proposals minimise noise pollution and Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (2012) promotes the maximum possible reduction in noise levels and seeks to ensure that noise impacts can be adequately controlled and mitigated.

Impact of the Proposed Extension on Neighbouring Amenity

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) requires development to safeguard the residential amenity of adjoining occupiers, including in respect of outlook, daylight and overbearing impact. This is supported by Paragraph 135 of the National Planning Policy Framework (2024), which seeks a high standard of amenity for existing and future users.

The proposal includes a first floor rear extension. By reason of its depth, siting and relationship to the shared boundaries, the extension would be positioned behind the Council's 45-degree lines when assessed from the nearest habitable room windows of adjoining properties. As such, it would not result in an unacceptable loss of daylight, sunlight, outlook or an overbearing impact to neighbouring occupiers.

Accordingly, the proposed extension is considered acceptable in terms of its direct impact on neighbouring residential amenity.

Impact of the Proposed Use on Neighbouring Amenity

Policy DMH 5 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) requires Houses in Multiple Occupation to demonstrate that they would not have a detrimental impact on the residential amenity of adjoining properties or the character of the area. Policy DMHB 11 and Paragraph 135(f) of the National Planning Policy Framework (2024) further require development to provide a high standard of amenity and avoid undue noise and disturbance.

The proposal seeks permission for an eight-person House in Multiple Occupation (Sui Generis). Officers acknowledge that the applicant has clarified that the use would be restricted to a maximum of eight occupants, and that all bedrooms are proposed for single occupancy. It is therefore accepted that the property could not be occupied by more than eight residents, and the assessment has been undertaken on that basis.

Notwithstanding this, an eight-person HMO would represent a materially more intensive form of occupation than use of the property as a single family dwelling. The site is located within a quiet residential street characterised predominantly by family housing, and the introduction of a Sui Generis HMO would be likely to generate a greater level of activity, comings and goings, and associated noise throughout the day and evening.

Given the terraced nature of the property, shared party walls, and the close relationship with adjoining dwellings, it is considered that the increase in activity associated with the proposed use

would result in noise and disturbance to neighbouring occupiers. This harm arises from the nature and intensity of the use itself, rather than from the size of the individual rooms or internal layout. This impact is not considered to be significant but does weight against the scheme in the planning balance.

7.2 Impact on Street Scene

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

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

Paragraph 135 of the NPPF (2024) states Planning policies and decisions should ensure that developments:
a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

The proposal includes the addition of a first floor extension to the rear of the dwelling behind an existing two storey side extension. The additional part would have a depth of 3.20m, a width of 3.75m and would be characterised with a flat roof adjoining the flat roof of the existing first floor side extension. It is noted that the existing two storey side extension does not benefit from planning permission but has been in existence since prior to 2008 and is therefore considered lawful.

The proposed first floor rear extension would be modest in depth and width and would be sited behind the 45 degree lines of sight when drawn from the nearest neighbouring first floor windows, in accordance with Policy DMHD 1 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020). Despite this, the extension which is characterised with a flat roof at first floor level would be considered of poor design and would negatively impact the appearance of the dwelling.

Whilst the first floor rear extension is sited behind the existing first floor rear extension characterised with a flat roof and would not be visible from the street scene along Bridgwater Road, it is noted that the proposed first floor rear given its protrusion from the rear building line would be visible from parts of Bridgwater Road Fields which is an area of public open space. Whilst the design of proposed first floor rear extension would not be considered a robust or reasonable reason for refusal independently, the poor design of the proposed extension, which would be visible from public vantage points, would weigh against the scheme in the planning balance.

Other than the above mentioned first floor rear extension, the only other proposed external changes to the application site include provision of waste bins located within the front hardstanding. The proposed waste storage would be located to the front of the dwelling on the existing hardstanding. This additional clutter to the front of the dwelling would not be ideal but would not be considered a robust or reasonable reason for refusal on design grounds in this instance.

7.3 Traffic Impact/Pedestrian Safety

Policy DMH 5 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) permits large Houses in Multiple Occupation only where there is good access to amenities and public transport. Policy DMT 1 further requires development to be sustainably located, with appropriate access to public transport, walking and cycling, and to address transport impacts in a comprehensive manner. Policies DMT 2 and DMT 6 seek to ensure that development does not give rise to highway safety issues, undue parking stress or adverse impacts on the local road network.

Site Characteristics and Background

The application site is located within a residential area of Ruislip and has a Public Transport Accessibility Level (PTAL) of 2, which is categorised as poor. The property currently benefits from a single on-plot parking space to the front of the dwelling. The surrounding area is not subject to parking controls, and levels of on-street parking vary within the locality.

Given the PTAL rating and limited on-plot parking provision, the potential impact of the proposal on on-street parking and the wider highway network has been carefully considered.

Parking Provision and Transport Assessment

Policy DMT 6 of the Hillingdon Local Plan requires new development to accord with the Council's adopted parking standards unless it can be demonstrated that a deviation from those standards would not result in a detrimental impact on the surrounding highway network. For HMOs of up to six occupants, the Council's standard requires one parking space per two occupants. Where occupancy exceeds this threshold, there is no prescriptive standard and proposals are assessed on a case-by-case basis, informed by supporting transport evidence.

During the course of the application, the applicant submitted a Transport Assessment and Travel Plan, which included on-street parking surveys demonstrating that there is sufficient spare capacity within the surrounding road network to accommodate any limited parking demand arising from the proposal. The Travel Plan also sets out measures to encourage the use of sustainable modes of transport, including walking, cycling and public transport.

While the proposal would continue to provide a single on-plot parking space, the Highway Authority has reviewed the submitted evidence and confirmed that the proposal would not result in a severe or unacceptable impact on parking stress, congestion or highway safety. In this regard, Paragraph 116 of the National Planning Policy Framework (2024) advises that development should only be refused on transport grounds where the residual cumulative impacts would be severe, which is not considered to be the case here.

Accordingly, the Highway Authority has raised no objection to the proposal.

Cycle Parking

The proposal includes the provision of eight secure and accessible cycle parking spaces, equating to one space per occupant, to be located to the rear of the property. This is considered to be an acceptable arrangement and accords with the requirements of Policies DMT 5 and DMT 6 of the Hillingdon Local Plan and Policy T5 of the London Plan (2021).

Refuse Storage

Adequate refuse and recycling storage would be provided within 10 metres of the highway boundary, in accordance with the Council's waste collection requirements. No objection is raised in

this regard.

Conclusion

Having regard to the submitted Transport Assessment and Travel Plan, and the advice of the Highway Authority, it is concluded that the proposal would not result in unacceptable impacts on highway safety, parking stress or the operation of the local road network. The development is therefore considered acceptable in highways and transport terms and accords with 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 the National Planning Policy Framework (2024).

7.4 Carparking & Layout

See above.

7.5 Urban Design, Access and Security Considerations

Internal Amenity Space

Policy DMH 5 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) permits large Houses in Multiple Occupation where satisfactory living conditions are provided for future occupiers. This is supported by Policy D6 of the London Plan (2021) and Policies DMHB 11 and DMHB 16 of the Hillingdon Local Plan, which seek to secure a high standard of residential accommodation with adequate internal space.

The proposed development would comprise eight bedrooms, each intended for single occupancy and each served by an individual en-suite bathroom, together with a shared communal kitchen/living space. The proposed internal floor areas are as follows:

Bedroom 1: 10.0 sqm (plus en-suite)

Bedroom 2: 10.1 sqm (plus en-suite)

Bedroom 3: 10.0 sqm (plus en-suite)

Bedroom 4: 10.5 sqm (plus en-suite)

Bedroom 5: 10.4 sqm (plus en-suite)

Bedroom 6: 10.4 sqm (plus en-suite)

Bedroom 7: 10.1 sqm (plus en-suite)

Bedroom 8: 10.8 sqm (plus en-suite)

Communal kitchen/living space: 18.8 sqm

All bedrooms meet the Council's adopted HMO standards for single occupancy rooms. While the rooms would not meet the London Plan minimum standard for double occupancy, the application is explicit that each bedroom would be occupied by no more than one person, and the proposal has been assessed on that basis.

It is noted that the communal kitchen/living space has been significantly increased from the previously refused scheme, from approximately 4 sqm to 18.8 sqm. This increase materially improves the quality and usability of shared facilities and is considered sufficient to serve a

maximum of eight occupants. The provision of en-suite facilities to each bedroom would further reduce pressure on shared spaces and assist in maintaining acceptable living conditions.

Having regard to the size of the bedrooms, the improved communal provision, and the restriction to single occupancy, officers are satisfied that the proposed layout would provide an acceptable standard of accommodation for future occupiers. The internal arrangement would not result in overcrowding or substandard living conditions.

Accordingly, the proposal is considered to comply with Policy DMH 5 of the Hillingdon Local Plan: Part Two (2020), Policies D6 and D14 of the London Plan (2021), and Paragraph 135(f) of the National Planning Policy Framework (2024) in respect of internal living conditions.

External Amenity Space

Policy DMHB 18 of the Hillingdon Local Plan: Part Two (2020) requires a minimum of 100 sqm of usable private outdoor amenity space for dwellings with four or more bedrooms. The application site benefits from a rear garden measuring approximately 132 sqm, which is considered to be well located, usable, and of sufficient size to serve the proposed level of occupancy.

No objection is raised in respect of the provision of external amenity space.

Inclusive Access

The proposal has been assessed against Policy D7 of the London Plan (2021). As the existing dwelling predates the introduction of accessible housing standards, the policy is not applicable in this instance. The proposal would not result in the loss of accessible housing stock, and no objection is raised on inclusive access grounds.

Security

The proposed development would not compromise the security of the application site or adjoining properties. No objection is raised in this regard.

7.6 Other Issues

PRINCIPLE OF DEVELOPMENT:

HOUSE IN MULTIPLE OCCUPATION:

Policy DMH 1 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states:
A) The net loss of existing self-contained housing, including affordable housing, will be resisted unless the housing is replaced with at least equivalent residential floorspace.
B) The Council will grant planning permission for the subdivision of dwellings only if:
i) car parking standards can be met within the curtilage of the site without being detrimental to the street scene; ii) all units are self contained with exclusive use of sanitary and kitchen facilities and provided with individual entrances and internal staircases to serve units above ground floor level;
iii) adequate amenity space is provided for the benefit of residents; and
iv) adequate living space standards are met.

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

Applicants proposing residential schemes will be required to demonstrate that this need has been taken into account.

Policy DMH 5 advises that Houses in Multiple Occupation (HMOs) 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.

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.

Policy H9 of the London Plan (2021) aims to ensure the best use of stock and states that boroughs should promote efficient use of existing housing stock. Policy H10 of the London Plan (2021) aims to promote housing size mix and states that schemes should generally consist of a range of unit sizes.

Lawful Existing Use of the Property

While the internal layout of the dwelling has been arranged in a manner capable of accommodating occupation as a small House in Multiple Occupation (Use Class C4), the lawful planning use of a property is determined by its actual occupation rather than its internal fit-out.

A material change of use to Use Class C4 only occurs when a dwelling is occupied by between three and six unrelated individuals living together as separate households. The mere intention to occupy a property as an HMO, or its physical capability to do so, is not sufficient to establish a lawful C4 use.

An officer site visit was undertaken on 9 December 2025, at which time the property was vacant and no tenants were in occupation. The applicant subsequently advised by email that three individuals were due to move into the property on 10 December 2025; however, no evidence has been submitted to demonstrate that such occupation occurred. No tenancy agreements, council tax records, utility accounts or other corroborating information have been provided.

The Council's Immediate Article 4 Direction removing permitted development rights for changes of

use from Class C3 (dwellinghouses) to Class C4 (houses in multiple occupation) came into effect on 11 December 2025. In the absence of evidence demonstrating lawful occupation as a small HMO prior to this date, the lawful use of the property at the time of assessment is considered to remain as a dwellinghouse (Use Class C3).

The application is therefore assessed on the basis that it proposes a change of use from a dwellinghouse (Use Class C3) to an eight-person House in Multiple Occupation (Sui Generis).

Loss of Family-Sized Accommodation

The proposed change of use would result in the loss of a dwelling capable of functioning as a family-sized home. The property is of a size, layout and location that would be suitable for continued occupation by a family household, and such accommodation is identified as being in short supply within the borough.

The Council's Strategic Market Assessment evidence, including the MetaStreet HMO and Private Rented Sector report commissioned in 2025, highlights an ongoing and acute need for family-sized housing within Hillingdon. The evidence demonstrates that pressures arising from the growth of HMOs and the private rented sector have contributed to a reduction in the availability of traditional family housing, particularly within established residential areas.

The proposed development would not contribute towards meeting this identified need and would instead permanently remove a dwelling capable of accommodating a family household. This weighs significantly against the proposal and is contrary to the objectives of Policy DMH 2 of the Hillingdon Local Plan.

Article 4 Direction and Evidence Base

The proposal has also been assessed in the context of the borough-wide immediate Article 4 Direction relating to Houses in Multiple Occupation, which came into force on 11 December 2025. The Direction was introduced following the commissioning of an independent evidence base and was formally endorsed by Full Council on 27 November 2025.

The evidence underpinning the Article 4 Direction identifies a range of cumulative impacts associated with the growth of HMOs across the borough, including pressures on housing mix, reductions in the supply of family-sized dwellings, and increased demands on local services. The evidence identifies approximately 2,537 HMOs across Hillingdon, equating to 8.7% of all private rented sector dwellings and 2.2% of the borough's total housing stock. HMOs are present in every ward, with particularly high concentrations in central and western parts of the borough. The purpose of the Article 4 Direction is not to prevent HMOs outright, but to ensure that proposals are subject to full planning scrutiny and can be assessed against Local Plan policies, particularly where they would result in the loss of family accommodation.

In this case, the Article 4 Direction is a material consideration which reinforces the Council's position that the loss of a dwelling capable of functioning as a family home should be resisted unless clearly justified.

Notwithstanding Use Class C4

Notwithstanding the above, even if it were accepted that the property had previously been in lawful Use Class C4, the Council considers that the proposal would still result in the loss of a property with the realistic capability of family occupation.

A property in Use Class C4 may revert to Use Class C3 without the need for planning permission. As such, prior to the proposed development, the dwelling retained a lawful and realistic fallback position as a family home. By contrast, once converted to a Sui Generis HMO, any reversion to a family dwelling would require express planning permission.

The proposed development would therefore materially and permanently remove that flexibility, further undermining the supply of family-sized housing within the borough. This consideration carries significant weight in the planning balance.

Policy Basis

It is acknowledged that the proposal would not result in an over-concentration of HMOs for the purposes of Policy DMH 5 and that the site benefits from proximity to public open space. However, these considerations do not outweigh the fundamental harm arising from the loss of a dwelling capable of contributing to the borough's supply of family housing, particularly in the context of the Article 4 Direction and the Council's evidenced housing need.

Whilst HMOs can play a role in meeting housing needs, this benefit is limited in this instance when weighed against the permanent loss of a family-sized dwelling.

For the reasons set out above, the proposal is not supported in principle and is considered contrary to Policies DMH 2 and DMH 5 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policies H9 and H10 of the London Plan (2021), and the objectives of the National Planning Policy Framework (2024).

BIODIVERSITY NET GAIN

The mandatory requirement for biodiversity net gain (BNG) came into place on 12th February 2024 for all Town and Country Planning Act development except for exempt and non-major development. BNG is required for non-major development submitted for determination from 2nd April 2024. Due to the nature of the proposal, the development is considered to be exempt from BNG requirements.

FLOODING AND DRAINAGE:

Policy SI12 and SI13 of the London Plan (2021) require, in summary, that flood risk is minimised and mitigated and that surface water run off is managed close to source.

Policy DMEI 9 and Policy DMEI 10 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) require, in summary, that flood risk is mitigated and proposals that increase the risk of flooding or which fail to make adequate provision to control surface water runoff will be refused.

As previously mentioned, the application site is not located within a Surface Water Flood Zone or Critical Drainage Area. The application site is located in Flood Zone 1 where there is a low probability of risk of flooding from rivers or seas. As such, all forms of development including residential development (which is classified as a 'more vulnerable use') are acceptable in this location, in terms of fluvial flood risk.

Planning permission is sought to change a 5 bedroom residential dwelling into a 8 bedroom HMO and a first floor rear extension. The additional occupants and floorspace would have no significant adverse drainage impact at the site. The proposed development is considered to be acceptable

from a drainage perspective.

PLANNING BALANCE:

The proposal seeks planning permission for the change of use of a dwellinghouse to an eight-person House in Multiple Occupation (Sui Generis), together with associated alterations.

In assessing the proposal, officers have had regard to the improvements made since the previously refused scheme. It is acknowledged that the internal layout has been revised and is capable of providing acceptable living conditions for future occupiers, with all bedrooms meeting the Council's standards for single occupancy and an enlarged communal kitchen/living space. No objection is raised in respect of internal amenity, external amenity space, inclusive access or site security.

It is also noted that the proposed rear extension would not result in unacceptable harm to the amenities of neighbouring occupiers and that, following the submission of additional information, the Highway Authority has raised no objection to the proposal. Furthermore, the development would not result in an over-concentration of HMOs within the surrounding area and the site benefits from proximity to public open space.

However, notwithstanding these positive and neutral considerations, significant weight is attached to the loss of a dwelling capable of functioning as a family-sized home. For the reasons set out in the Principle of Development section, the lawful use of the property at the time of assessment is considered to remain as a dwellinghouse (Use Class C3), and the proposed change of use would permanently remove its ability to contribute to the borough's supply of family housing, for which there is an identified and ongoing need.

Weight is also given to the context of the immediate Article 4 Direction, which was introduced following a robust evidence base demonstrating the cumulative impacts of HMO growth on housing mix and the availability of family accommodation across the borough. The proposal would conflict with the objectives underpinning that Direction by facilitating the permanent loss of a dwelling capable of family occupation.

Even if it were accepted that the property had previously been in lawful Use Class C4, the proposed change to a Sui Generis HMO would still result in the permanent loss of a property with the realistic capability of reverting to family use without the need for planning permission. This loss of flexibility weighs significantly against the proposal.

While HMOs can play a role in meeting certain housing needs, this benefit is limited in this instance and does not outweigh the identified harm arising from the loss of a family-sized dwelling, particularly when considered in the context of the Council's adopted housing strategy and evidence base.

On balance, the proposal is considered to result in unacceptable harm that is not outweighed by the benefits of the development. The application is therefore recommended for refusal.

8. Reference Documents

Hillingdon Local Plan: Part One - Strategic Policies (November 2012)
Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)
Hillingdon's Local Plan Part 2 Site Allocations and Designations (2020)
Hillingdon Design and Accessibility Statement: Accessible Hillingdon (2017)
The London Plan (2021)

National Planning Policy Framework (2024)

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