

Planning Statement

Extensions and alterations and change of use to a
HMO for 8no. residents living together as a single
household with care provided (Sui Generis)

at

246 Station Road, Hayes, UB3 4AN

Prepared on behalf of the Applicant

Mr Luchmun

Reference:

246SR-1001

Date:

June 2024

1. Introduction

1.1 This Planning Statement has been prepared on behalf of Mr Luchmun ('the Applicant') in support of a full planning application for extensions and alterations and change of use to provide a house in multiple occupation ('HMO') for up to 8no. residents living as a single household with care (Sui Generis Use) at 246 Station Road, Hayes UB3 4AN.

Description of Development

1.3 The planning application seeks full planning permission for the following Description of Development:

"Two storey side and single storey side/rear extensions and change of use to HMO for 8no. residents living together as a single household with care (Sui Generis Use)."

Purpose of this Document

1.4 This Planning Statement describes the application proposals in detail and relates them to the relevant planning policy framework.

Accompanying Documents

1.5 This statement should be read in conjunction with the accompanying Application Drawings and technical reports, as follows:

- Existing Ground and First Floor Plans and Elevations, drawing no. 101
- Existing Loft Plan, Location Plan and Block Plan, drawing no. 102
- Proposed Ground and First Floor Plans and Elevations, drawing no. 103
- Proposed Loft Plan, Site Plan and 3D View, drawing no. 104
- Transport Statement, prepared by Pulsar Transport Planning

2. Site and Surroundings

2.1 246 Station Road is a two storey semi-detached house located on the west of Station Road. The house is set within a rectangular plot measuring some 20m in depth and 7m in width. The property has undergone previous extensions at ground floor and a loft conversion with rear dormer.

2.2 The property is currently in C3(b) use - dwellinghouses with not more than 6no. residents living together as a single household where care is provided for residents.

2.3 One car parking space is available to the frontage.

2.4 No. 248 Station Road adjoins the property to the south and includes ground floor rear extensions which match the depth of those at the application property.

2.5 No. 244 Station Road is to the north and appears as a three storey property from the rear due to significant roof alterations. The rear wall of no. 244 roughly aligns with the two storey rear elevation of the application property.

2.6 The area is generally characterised by two storey residential properties of varying styles.

2.7 The site is within flood zone 1 and has a Public Transport Accessibility Level ('PTAL') of 4-5 (good / very good). For the avoidance of doubt, the application site does not contain a listed building, nor is it within a conservation area. There are no known tree preservation orders affecting the proposals.

3. Planning History

3.1 Following a desktop review of the Council's online records, the following planning applications are considered to be relevant to the development proposals.

Application Reference	Description of Development	Status
2021/2326	Certificate of Lawful Development (Proposed): Conversion of roof space to habitable use to include a rear dormer and two front rooflights	Approved - 03/08/2021
2019/3513	Two storey side extension, single storey side extension, first floor rear extension, and conversion of roofspace to habitable use to include a rear dormer, installation of vehicular crossover to front and change of use from a dwelling with up to six people living together as a single household and receiving care (Use Class C3(b)) to a 8-bed house in multiple occupation for eight residents living together as a single household where care is provided for residents (Sui Generis Use)	<p>Refused – 15/05/2020</p> <p>R1 - The proposed single storey rear extension, by reason of its size, scale, bulk and proximity, would be detrimental to the amenities of the adjoining occupier at 244 Station Road by reason of overdominance, overshadowing, visual intrusion, loss of light and loss of outlook. Therefore the proposal would be contrary to policies BE19, BE20 and BE21 of the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012), Policies DMHB11 and DMHD1 of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019) and the adopted Supplementary Planning Document HDAS: Residential Extensions</p> <p>R2 - The rear dormer window, by reason of its size, scale, bulk, and design, would fail to harmonise with the architectural composition of the original semi-detached dwelling, would be detrimental to the character, appearance and symmetry of the pair of semi-detached houses of which it forms a part and to the visual amenities of the street scene and the surrounding area. Therefore the proposal would be contrary to Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies BE13, BE15 and BE19 of the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012), Policies DMHB11 and DMHD1 of the emerging Hillingdon Local Plan: Part Two - Development Management</p>

		<p>Policies with Modifications (March 2019) and the adopted Supplementary Planning Document HDAS: Residential Extensions.</p> <p>R3 - The proposal has not demonstrated that sufficient off street parking/manoeuvring arrangements would be provided, and therefore the development is considered to result in substandard car parking provision, leading to on-street parking/queuing to the detriment of public and highway safety and contrary to policies AM7 and AM14 of the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012), to Hillingdon's Adopted Parking Standards as set out in the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012) and the adopted Supplementary Planning Document HDAS: Residential Extensions.</p> <p>R4 - The proposal, by reason of the siting of the ground window to bedroom 2, given its proximity to the wall of the proposed extension, would result in the provision of a habitable room with very poor/no outlook and very limited levels of natural lighting that would result in a substandard form of living accommodation and reliance upon artificial means of lighting which would fail to satisfy sustainability and energy efficiency objectives and would be to the detriment of the amenity of future occupiers, contrary to Policies 3.5 and 5.3 of the London Plan (March 2016), Policies BE19, BE20 and BE21 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the adopted Supplementary Planning Document HDAS: Residential Extensions.</p>
2019/1808	Two storey side extension, part single, part two storey side/rear extension, conversion of roof space to habitable use to include a rear dormer and change of use from a dwelling with up to six people living together as a single household and receiving care (Use Class C3(b)) to a 8-bed house in multiple occupation for eight residents living together as a single household where care is provided for residents (Sui Generis Use)	<p>Refused – 28/08/2019</p> <p>R1 - The proposed part two storey, part single storey side/rear extension, by reason of its size, scale, bulk and design, would fail to appear as a subordinate addition and would thus be detrimental to the appearance of the original house, the visual amenities of the street scene and the character and appearance of the wider area. The proposal is therefore contrary to Policy BE1 of the Hillingdon Local Plan: Part One -</p>

		<p>Strategic Policies (November 2012), Policies BE13, BE15 and BE19 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the adopted Supplementary Planning Document HDAS: Residential Extensions.</p> <p>R2 - The proposed rear dormer window, by reason of its size, scale, bulk, and design, would fail to harmonise with the architectural composition of the original semidetached dwelling, would be detrimental to the character, appearance and symmetry of the pair of semi-detached houses of which it forms a part and to the visual amenities of the street scene and the surrounding area. Therefore the proposal would be contrary to Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies BE13, BE15 and BE19 of the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012) and the adopted Supplementary Planning Document HDAS: Residential Extensions.</p> <p>R3 - The proposed part two storey, part single storey side/rear extension, by virtue of its size, scale, bulk, depth and proximity, would be detrimental to the amenities of the adjoining occupiers at Number 244 Station Road by reason of over-dominance, overshadowing, visual intrusion, loss of light and loss of outlook. Therefore the proposal would be contrary to policies BE19, BE20 and BE21 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the Council's adopted Supplementary Planning Document HDAS: Residential Extensions.</p> <p>R4 - The proposal has not demonstrated that sufficient off street parking/manoeuvring arrangements would be provided, and therefore the development is considered to result in substandard car parking provision, leading to on-street parking/queuing to the detriment of public and highway safety and contrary to policies AM7 and AM14 of the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012), to Hillingdon's Adopted Parking Standards as set out in the</p>
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		<p>Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012) and the adopted Supplementary Planning Document HDAS: Residential Extensions.</p> <p>R5 - The proposal, by reason of the siting of the ground windows to bedrooms 2 and 5, given their proximity to the side boundary and flank wall of the adjoining property, would result in the provision of habitable rooms with very poor/no outlook and limited levels of natural lighting that would result in a substandard form of living accommodation and reliance upon artificial means of lighting which would fail to satisfy sustainability and energy efficiency objectives and would be to the detriment of the amenity of future occupiers, contrary to Policies 3.5 and 5.3 of the London Plan (March 2016), Policies BE19, BE20 and BE21 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the adopted Supplementary Planning Document HDAS: Residential Extensions.</p>
2012/2695	Certificate of Lawful Development (Proposed): Change of use from Use Class C3a to Use Class C3b to be used as a shared house for up to 6 people including support staff (Application for a Certificate of Lawful Development for a Proposed Development)	Approved – 12/12/2012
74/1495	Residential extension	Approved – 04/11/1974

4. The Development Proposal

4.1 Full planning permission is sought for:

“Two storey side and single storey side/rear extensions and change of use to HMO for 8no. residents living together as a single household with care (Sui Generis Use).”

4.2 The existing store room, conservatory and ‘smoking room’ which all form existing extensions to the property would be demolished.

4.3 A new single storey side and rear extension would be erected, extending 3m beyond the existing rear wall and a maximum width of 5.9m. The extension would be inset from the shared boundary with no. 244 by 1.4m and would be built up to the boundary with no. 248. The extension would have a flat roof to match the height of the existing.

4.4 The two storey side extension would be a modest 3.2m deep by 1.3m wide extension to the northern flank. It would be set back from the principal elevation and set down from the main ridge of the property.

4.5 Proposed materials are to match the existing property.

4.6 The proposals would provide a 8-bed HMO with care provided to residents, thus constituting a material change of use from Class C3(b) to Sui Generis. However, the use would, for all intents and purposes, be as per the existing use but with two additional bedrooms provided. One additional bedroom would be provided at ground floor within the proposed rear extension and the other within the loft space, served by the recently constructed dormer.

5. Planning Policy Framework

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that development proposals be determined in accordance with the development plan, unless material considerations indicate otherwise.

5.2 In this case, the relevant parts of the development plan are:

- The London Plan (2021);
- Hillingdon Local Plan: Part 1 – Strategic Policies (2012);
- Hillingdon Local Plan: Part 2 – Development Management Policies (2020); and
- Hillingdon Local Plan: Part 2 – Site Allocations and Designations (2020).

5.3 Material considerations include the National Planning Policy Framework ('NPPF') (2023).

Summary of Key Policies

5.4 The Hillingdon Local Plan: Part 1 sets out the long-term vision and objectives for the borough. It provides broad policies for steering and shaping development, but does not set guidelines for decisions about planning applications, which are provided in the Local Plan: Part 2 – Development Management Policies document.

5.5 Key policies from the Development Management Policies document, include:

- **Policy DMH 1: Safeguarding Existing Housing** – seeks to resist the loss of existing self-contained housing.
- **Policy DMH 5: HMOs and Student Accommodation** – requires proposals for large HMOs to demonstrate that there is good accessibility to local amenities and public transport, they accord with the Accessible Homes standards and provide satisfactory living conditions for occupiers, and there will be no adverse impact on the amenity of neighbouring properties or the character of the area.
- **Policy DMH 8: Sheltered Housing and Care Homes** – states that the development of residential care homes and other types of supported housing will be permitted provided that it would not lead to an overconcentration of similar uses detrimental to residential character or amenity, it caters for identified needs, and the accommodation is fully integrated into the residential surroundings.

- **Policy DMHB 11: Design of New Development** – requires all development, including extensions, to be designed to the highest standards.
- **Policy DMT 6: Vehicle Parking** – the Council's parking standards for HMOs over 6no occupants will be assessed through a transport appraisal and travel plan. 1no. cycle space is required per occupant.
- **Policy DMHD 1: Alterations and Extensions to Residential Dwellings** - provides detailed policies for assessment of residential dwellings. Planning applications will be required to ensure that:
 - there is no adverse cumulative impact of the proposal on the character, appearance or quality of the existing street or wider area;
 - a satisfactory relationship with adjacent dwellings is achieved;
 - new extensions appear subordinate to the main dwelling in their floor area, width, depth and height;
 - new extensions respect the design of the original house and be of matching materials;
 - there is no unacceptable loss of outlook to neighbouring occupiers;
 - adequate garden space is retained;
 - adequate off-street parking is retained; and
 - trees, hedges and other landscaping features are retained.
 - single storey rear extensions on semi-detached houses with a plot width over 5m shall not exceed 3.6m and shall not exceed 3m in height with a flat roof.
 - pitched roofs should be of a similar pitch to that of the original roof and subordinate to it in design.
 - side extensions should not exceed half the width of the original property and two storey side extensions should be set in a minimum of 1m from the side boundary and, for semi-detached properties, set back a minimum of 1m behind the main front elevation.

6. Planning Assessment

Principle of Change of Use

6.1 The site is currently in a HMO use, albeit falling within Use Class C3(b) rather than a Sui Generis use. As a result of the proposals, the existing use would continue but the number of bedrooms provided would increase by two, from 6-beds to 8. There would be no loss of residential use (compliant with Policy DMH 1), the site is well-connected to local amenities and public transport links, demonstrated by its PTAL 4/5 (compliant with Policy DMH 5), and the site would continue to provide the same type of care as existing (compliant with Policy DMH 8).

6.2 The principle of converting the property to an 8-bed HMO, with care provision, has previously been accepted by the Council under planning applications 2019/1808 and 2019/3513, subject to the impact on visual and residential amenity and car parking, which are discussed below.

Extensions and Alterations – Impact on Visual and Neighbouring Amenity

6.3 The extensions would largely be sited to the rear of the property with limited, if any, visibility from the streetscene. The two storey side extension would comply with minimum spacings as set out at Policy DMHD 1. It would be inset from the side boundary by 1m and would be set back from the main front elevation of the property. In addition, its roof would be set lower than the main ridge by 1m and would match the pitch and gabled form of the original house. The two storey extension would therefore appear subordinate to the host dwelling and would not harm the visual amenities of the area.

6.4 The rear extensions would be single storey in scale and would form by a single flat roofed side / rear extension. It is acknowledged that the overall depth of the rear extension would exceed the 3.6m depth considered acceptable by Policy DMHD 1 when taken cumulatively. However, the proposed extension should be considered in the context of the individual site circumstances, which are a material consideration in the determination of this application.

6.5 Existing poor quality lean-to style extensions would be removed. These extensions are positioned up to the boundary with no. 244 and extend approximately 9m beyond the rear wall of the neighbour, impacting on outlook from the neighbouring property. The proposed extensions would provide a 5m clearing of built form as viewed from the neighbour. The proposed side/rear extension would also be offset from the boundary by 1.4m, significantly reducing the impact on the

neighbour compared to the existing situation and that of the previously refused applications on this site.

6.6 The impact on no. 248 would be limited and, at 3m deep beyond the neighbour's existing extensions, within the acceptable depth for single storey rear extensions set out in the Local Plan.

6.7 It is also not unusual for rather substantial extensions to be constructed to the rear of properties in the area. The plots are deep and sufficient garden space remains to serve occupiers alongside additional built form.

6.8 The extensions would provide an improved level of care through better layout and quality and increased bedroom numbers. The impact on no. 244 is considered an improvement and given the limited visibility of the extensions, the impact on character and appearance would be limited in this instance. It is considered that a deviation from the policy is justified in this instance.

Transport Impacts

6.8 Section 9 of the NPPF emphasises the importance of promoting sustainable transport modes of transport such as walking, cycling and public transport. The London Plan focuses on reducing car dependency and promoting a significant shift towards active modes of travel and public transport use. Policy T1 of the Local Plan seeks to steer development to the most appropriate locations in order to reduce their impact on the transport network and to encourage access by sustainable modes.

6.9 It is clear that planning policy seeks to reduce car dependency and encourage sustainable modes of transport. The site is in an accessible location, demonstrated by the PTAL 4/5, with many locally accessible bus services, Hayes and Harlington Station c. 785m to the south-east, and good conditions for walking and cycling. However, it is material that previous application on this site has been refused as it had not been demonstrated that sufficient off-street parking/manoeuvring arrangements would be provided.

6.10 In terms of parking provision, the Hillingdon Local Plan states that the car parking requirements for HMOs over 6 occupants will be assessed through a transport appraisal. London Plan Policy T6.1 sets the starting point for all development proposals that are well-connected to public transport should be 'car-free'. While the London Plan does not provide specific standards for HMOs, Table 10.3 of the London Plan states that for Outer London PTAL 4 sites, houses with 3+ beds should have a maximum of 0.5-0.75 spaces, whereas all sites in PTAL 5-6 should be car-free.

6.11 1 car parking space is proposed to the frontage, as per existing arrangements. The level of car parking is compliant with the Development Plan, as it does not exceed the specified maximum standards, and is consistent with the overarching aims to encourage active and sustainable travel at a site which is close to local facilities and public transport options.

6.12 This application is supported by a Transport Statement, including an overnight car parking survey based on the Lambeth parking methodology. The overnight parking survey found an average of 77% parking stress on roads within a 200m cordon of the site, equivalent to c. 30 unoccupied on-street parking spaces each evening. While it is considered unlikely that such a development would generate parking, even if all residents were to own cars, sufficient space exists on the local highway network to accommodate the additional use without detriment to highway safety. It is highlighted that this application seeks to extend and convert an existing HMO for up to 6 occupants into a HMO for 8 occupants, i.e. a net uplift of 2 occupants. Therefore, the maximum additional car parking demand would be 2 spaces in the event that both occupants owned a car.

6.13 The Transport Statement also demonstrates that sufficient space for cycle parking in accordance with adopted policy exists within the site, the development would be served by suitable access, and there would not be a material increase in the level of traffic generated compared to the existing situation.

6.14 The development would therefore have a minimal impact on the public highway network and is compliant with the NPPF and Development Plan.

7. Conclusion

6.13 This Planning Statement has been prepared in support of a full planning application for extensions and alterations and change of use to provide a house in multiple occupation ('HMO') for up to 8no. residents living as a single household with care (Sui Generis Use).

6.14 The principle of converting the property to an 8-bed HMO, with care provision, has previously been accepted by the Council under planning applications 2019/1808 and 2019/3513 and remains in accordance with the Development Plan.

6.15 Most recently, planning application 2019/3513 was refused for a number of reasons. These reasons for refusal have been overcome through this revised application, as detailed above and summarised below.

2019/3513 Reason for Refusal	Current Proposal
1. The proposed single storey rear extension, by reason of its size, scale, bulk and proximity, would be detrimental to the amenities of the adjoining occupier at 244 Station Road by reason of overdominance, overshadowing, visual intrusion, loss of light and loss of outlook. Therefore the proposal would be contrary to policies BE19, BE20 and BE21 of the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012), Policies DMHB11 and DMHD1 of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019) and the adopted Supplementary Planning Document HDAS: Residential Extensions.	The proposed single storey rear extension has been off-set from the boundary with no. 244 Station Road. It would replace existing single storey rear extensions that abut the boundary and would reduce the impact on the neighbour.
2. The rear dormer window, by reason of its size, scale, bulk, and design, would fail to harmonise with the architectural composition of the original semi-detached dwelling, would be detrimental to the character, appearance and symmetry of the pair of semi-detached houses of which it forms a part and to the visual amenities of the street scene and the surrounding area. Therefore the proposal would be contrary to Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies BE13, BE15 and BE19 of the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012), Policies DMHB11 and DMHD1 of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019) and the adopted	The rear dormer window does not form part of the application proposals. A dormer window has been constructed via permitted development rights to serve the second floor accommodation (ref: 2021/2326).

Supplementary Planning Document HDAS: Residential Extensions.	
3. The proposal has not demonstrated that sufficient off street parking/manoeuvring arrangements would be provided, and therefore the development is considered to result in substandard car parking provision, leading to on-street parking/queuing to the detriment of public and highway safety and contrary to policies AM7 and AM14 of the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012), to Hillingdon's Adopted Parking Standards as set out in the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012) and the adopted Supplementary Planning Document HDAS: Residential Extensions.	The planning application is supported by a Transport Statement, including overnight car parking survey, which demonstrates that the proposed development would have a minimal impact on the public highway network and is compliant with the NPPF and Development Plan.
4. The proposal, by reason of the siting of the ground window to bedroom 2, given its proximity to the wall of the proposed extension, would result in the provision of a habitable room with very poor/no outlook and very limited levels of natural lighting that would result in a substandard form of living accommodation and reliance upon artificial means of lighting which would fail to satisfy sustainability and energy efficiency objectives and would be to the detriment of the amenity of future occupiers, contrary to Policies 3.5 and 5.3 of the London Plan (March 2016), Policies BE19, BE20 and BE21 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the adopted Supplementary Planning Document HDAS: Residential Extensions.	Bedroom 2 is served by an additional window to increase natural light entering into the room and provide dual aspect accommodation. The separation distance to the wall of the proposed extension has also increased to 5m.

6.15 This statement demonstrates that the proposals accord with national, regional and local planning policies and guidance, and as such, we respectfully request that the application is approved without delay in accordance with paragraph 11 of the NPPF.