

246 Station Road, Hayes UB3 4AN

LPA Ref: 18722/APP/2024/1816

This note has been prepared on behalf of Mr Luchmun ('the Applicant') in support of the full planning application at 246 Station Road, Hayes UB3 4AN ('the site') which is currently under consideration by London Borough of Hillingdon ('LBH') under planning application reference 18722/APP/2024/1816.

The planning application was submitted on 8th July 2024 and the description of development is:

"Erection of a single storey extension to the rear, following the demolition of the existing store room and conservatory. Change of use from dwellinghouse (Class C3) to 8 Persons HMO (Sui Generis)."

Note, the description of development requires updating following submission of amended plans which reduces the HMO to a 7-person HMO.

This note provides clarification on the proposed use of the site as a HMO for up to 7 residents with care.

The site provides accommodation for individuals who suffer from, or are recovering from, mental illness. Carers provide tenants with various support to enable them to live their lives, eliminating the need to be placed in residential care facilities. Support provided may include liaising with Department of Work and Pensions (applying for the appropriate benefits, Employment opportunities); liaising with healthcare professionals to ensure that tenants get the level of care and support required; supporting tenants to attend their appointments; take care of their mental and physical health; support tenants with activities of daily living, budgeting skills, cooking and looking after themselves and their immediate environment; support tenants with medication.

With regard to on-site management, there is currently one member of staff on-site 24 hours a day, 7 days a week. Staff changeover takes place at 8am, 2pm or 8pm but mostly staff work 24 hour shifts and therefore there is only one c. 15 minute changeover per day. The proposals would result in one additional member of staff on-site during the hours of 9am – 5pm. With regard to additional impacts of the development, the potential minor increase in trips generated by the additional staff member is considered to be minor, particularly noting the agreement that the site would be car-free. Current carers are local to the site and travel via public transport or walk.

The site was granted a Lawful Development Certificate for the current use in December 2012 (ref: 18722/APP/2012/2695) for:

"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."

LBH determined that the use did not require planning permission because no material change of use would occur and the use was determined to fall within Class C3b.

The reason a change of use is considered necessary is because the proposed use of the site for up to 8no. residents would no longer fall within a C3b Use which restricts the number of occupants to no more than 6-persons.

The approach to the use is consistent with the determination of other recent planning applications on the site by LBH, references 18722/APP/2019/3513 and 2019/1808, wherein the same use was being sought. The description of development for both applications included “*...change of use from a dwelling with up to 6 people living together as a single household and receiving care (Use Class C3(b)) to a 8-bed house in multiple occupation (or HMO) for 8 residents living together as a single householder where care is provided for residents (Sui Generis Use).*”

With regard to the principal of the proposed use, the Officer’s Delegated Report for ref: 2019/3513 states:

“Policies H2 and H3 of the Hillingdon Local Plan (Part Two) discourages development that would result in the loss of residential accommodation and uses. The site is currently in HMO use and would therefore be acceptable in principle.

Paragraph 2.8 of the LBH Houses in Multiple Occupation and other non-self contained housing SPG confirms that the Council regard HMO’s as a residential use and, as such, the proposed development complies with the above-mentioned policies.

Policy H7 of the Local Plan (Part 2) supports the principle of converting residential dwellings into more units provided it does not result in any demonstrable harm towards the character and appearance of the surrounding area or the amenities of neighbouring residents. Furthermore, the following criteria must also be satisfied:-

- (i) Provision of effective sound insulation;
- (ii) Adequate quantum of car parking provided;
- (iii) All units are self contained; and
- (iv) Adequate amenity space is provided for residents.

Points (i) and (iii) relate to the formation of self contained flats and are not applicable in this instance. Attention is drawn to Paragraph 7.16 of the Local Plan (Part Two) which sets the context for Policy H7 and states that:-

‘It is recognised... that conversion to allow the shared use of facilities such as kitchens and bathrooms could provide a source of low cost accommodation for those such as...community care patients for whom owner-occupation or local authority housing is rarely an option.’

The proposed use would provide community care facilities as recognised in Paragraph 7.16.”

LBH has therefore previously raised no objection to the principal of the proposed use as HMO with care.

We trust this provides sufficient information to allow the planning application to be determined.