

PLANNING, DESIGN AND ACCESS STATEMENT

Application by Mr M Johar

Change of use to 8 room House in Multiple Occupation (Sui Generis). Provision of car parking, amenity space, cycle/refuse storage and associated works.

46 Bath Road, Harlington, UB3 5AH



**Prepared by Mrs Sarah A King
BA (Hons) DipTP MRTPI**

2 November 2021



RTPI
mediation of space · making of place



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1 Introduction and background

- 1.1 This report has been prepared in support of a planning application to change the use of the property to an eight bedroom HMO with shared kitchen and dining facilities (Sui Generis use class). Each room would be intended and let for single person occupancy only.
- 1.2 The application follows the recent pre application submission, reference 24469/PRC/2021, for revised proposals for an 8 (or 9) bedroom HMO. The pre application submission followed the earlier appeal (dismissed) for a 10 room HMO (appeal APP/R5510/W/20/3262001, dated 1 March 2021, following the refusal of application 2449/APP/2020/1438). Case Officer: Nicola Taplin. The pre application response letter, dated 20 August 2021, set out support for the 8 room HMO, subject to resolving details regarding the standard of amenity of the internal layout and cycle storage details.
- 1.3 The project offers high quality affordable housing to potential tenants seeking to become residents in the area. It is envisaged that there will be strong interest from those who are employed by the airport, airlines, hotels, ancillary and support businesses given the close proximity to Heathrow airport, as well as the wider business communities in Hayes, Cranford, Hounslow and Slough.
- 1.4 The proposed plans show bin stores, secure cycle storage and shared amenity space. The existing rear driveway will also be reconfigured to provide two car parking spaces.
- 1.5 At the current time, the building is being let as a small HMO (use class C4), with six HMO licensed rooms currently let (single person occupancy).
- 1.6 The existing property comprises a large detached dwelling, set upon a relatively large plot measuring 38.7 metres in length and 14.2 metres in width (maximums). The total plot area measures 0.93 hectares and reflects the general size and layout of adjoining plots.

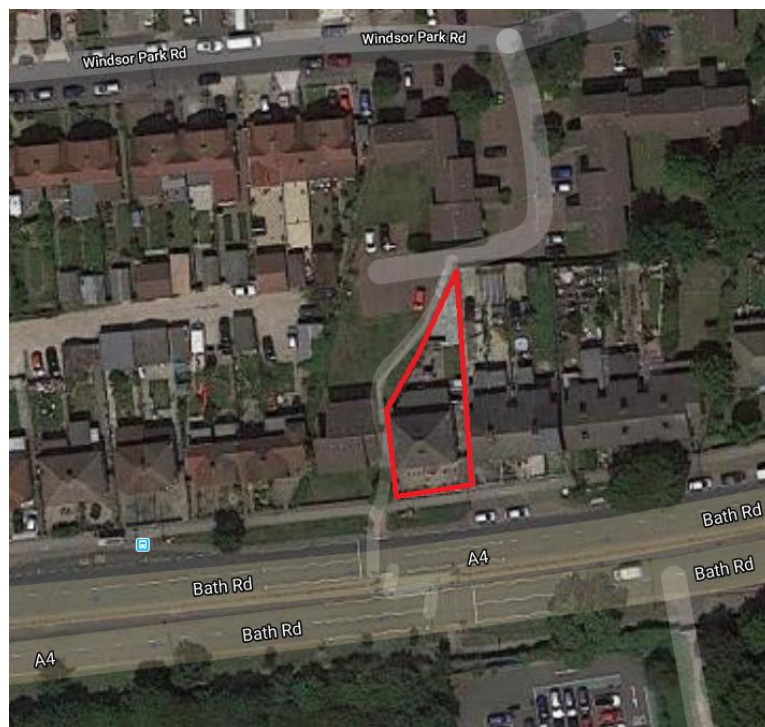


Image 1: Plan showing location of the site in the wider context



Image 2: Extract from the submitted site location plan

- 1.7 The property is an attractive detached building constructed of white painted brick and a plain tile hipped roof over. The property currently has pedestrian access off Bath Road to the front, and vehicular access to the rear off Windsor Park Road providing unmarked parking for approximately three vehicles in a secure rear courtyard. Parking bays on Bath Road, to the front of the application site are permit parking only.
- 1.8 The site is not covered by any specific designations, including conservation area, listed building, tree preservation orders or landscape designations.
- 1.9 The site lies within PTAL Zone 3, lying along the main A4 Bath Road, which offers regular bus services. Bus stops exist to the immediate right and left of the application site along Bath Road.

2 The application proposal

2.1 Following the receipt of the pre application advice comments, the revised proposal includes a number of main elements;

- Conversion and change of use from C4 small HMO (six room) to large HMO (eight room).
- No extensions to the building are proposed.
- Reorganisation of the ground floor to create enlarged shared living space, including new lounge room at ground floor.
- Rear ground floor window opening to be enlarged to provide a new full height glazed doors to serve the new lounge area.
- Provision of two car parking spaces located to the rear of the site.
- Creation of new landscaped garden amenity area (currently none provided for the six room HMO), including grassed and landscaped areas to the rear and side of the building, in excess of 118 sqm area.
- Reorganisation of the internal space to ensure that all bedrooms have a good standard of light, aspect and outlook.
- Bin and cycle storage provision has been provided to the front of the site.

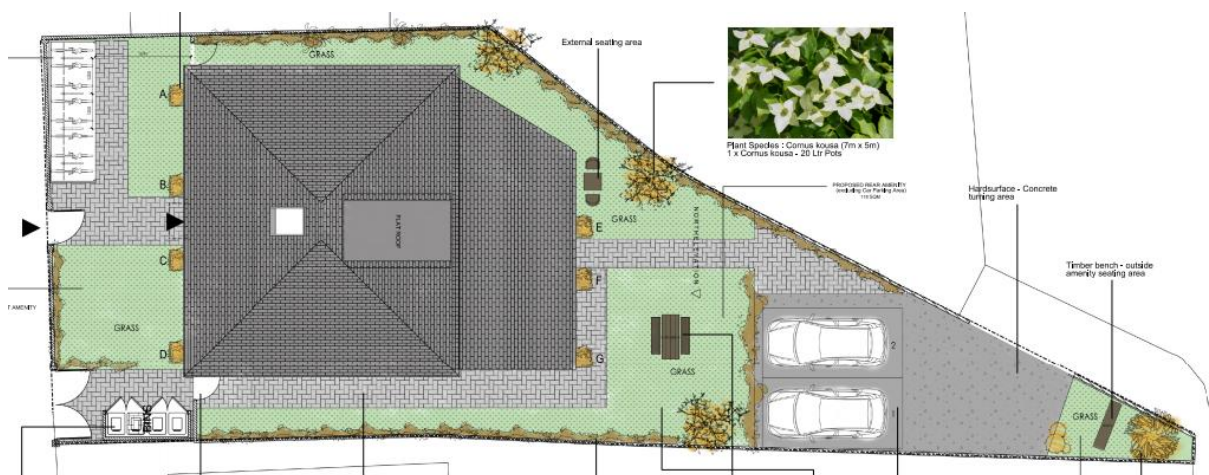


Image 3: Extract from the landscape drawing showing the overall site layout (reference LAN-001) (not to scale)

3 Site history and property background

- 3.1 The property was originally built and used as a dwellinghouse (Use Class C3).
- 3.2 In 2019, the property was purchased by the Applicant and renovated. Use as a six bedroom HMO commenced following renovation (Use Class C4). The Use Classes Order permits authorised change of use from C3 to C4, so no planning permission was required for this change of use.

Application 24469/APP/2019/2772 – CLD for building alterations and works

- 3.3 Application 24469/APP/2019/2772 granted a certificate of lawful development for the conversion of the roofspace to habitable use, including a rear dormer. This has been implemented.

Application 24469/APP/2019/3265 - change of use to a 10 bedroom HMO

- 3.4 Application 24469/APP/2019/3265 refused planning permission for a change of use to a 10 bedroom HMO, along with use of roofspace, rear dormer, front roof light, alterations to rear elevation and addition of cycle and refuse storage. The application was refused on the 9 January 2020 for the following single reason;

The proposed off street car parking provision, by reason of the proposed parking layout, including tandem parking, would fail to provide independently accessible parking space in accordance with the Council's adopted car parking standards and be likely to result in additional off street parking, prejudicial to highway and pedestrian safety. The proposal would therefore be contrary to Policies AM7 and AM14 of the Hillingdon Local Plan: Part Two – saved UDP policies (November 2012) and Policy DMT 2 of the Hillingdon Local Plan: Part Two – Development Management Policies with Modifications (March 2019)

Application 24469/APP/2020/1438 – change of use to a 10 room HMO and subsequent appeal

- 3.5 Application APP/2020/1438 sought permission for the change of use from a C4 six room small HMO to a large 10 room HMO. It was refused on the 13 August 2020 for the following reasons and dismissed on appeal on the 1 March 2021.

1. The proposed development, by virtue of the proposed off street parking/manoeuvring arrangements, would result in the loss of all existing amenity space and would fail to provide any amenity space of sufficient size and quality commensurate to the size and layout of the proposed development. The proposal would, thus, result in an over-development of the site detrimental to the residential amenity of existing and future occupiers. The proposal is therefore contrary to Policies DMH 1, DMH 5, DMHB 11 and DMHB 18 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

2. The proposed off-street car parking provision would fail to provide parking spaces in accordance with the Council's adopted car parking standards and thus would result in additional on-street parking, prejudicial to highway and pedestrian safety. The proposal would therefore be contrary to Policies DMT 2 and DMT 6 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

3. The proposal, by reason of the siting of the ground floor flank bedroom window, given its proximity to the side boundary, flank wall of the adjoining property and cycle parking, would result in the provision of a habitable room with very restricted levels of outlook and 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 DMH 1, DMH 5 and DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and Policies 3.5 and 5.3 of the London Plan (March 2016).

- 3.6 The appeal (reference APP/R5510/W/20/3262001 dated 1 March 2021) dismissed the proposal on two grounds, specifically 1) inadequate amenity space provision and 2) daylight/outlook for future occupiers of bedroom 7 (ground floor side view room).

Pre application reference 24469/PRC/2021 - revised proposals for an 8 or 9 bed HMO

- 3.7 The submitted pre-application proposal sought to fully address the issues raised in the previous appeal decision by reducing the number of bedrooms to 8 (or 9); avoiding the use of bedroom 7 for accommodation purposes; and increasing the amount of shared amenity space to the rear of the dwelling (and reducing car parking to two spaces). Two alternative internal layouts (8 and 9 rooms) were submitted to allow for some discussion regarding internal layout and density of use.
- 3.8 The comprehensive pre application response letter, dated 20 August 2021 (attached at **Appendix 1**) set out a detailed evaluation of the submitted schemes. Concerns regarding the impact of 9 units and ability of the site to provide adequate amenity were raised. However, general support was set out regarding the 8 unit layout. Some issues were raised regarding the outlook and light to the proposed shared living accommodation and also regarding the proposed cycle storage provision and layout. These matters have been addressed through a redesign as part of this application submission.

4 Location and Context

- 4.1 The site lies east of Harlington, on the north side of Bath Road (A4 dual carriageway). Heathrow Airport lies south and west of Bath Road, opposite the site, with long stay car parking directly opposite the site.
- 4.2 Bath Road is a busy trunk road and offers regular bus connections, with bus stops virtually opposite the site. A traffic light controlled pedestrian crossing over Bath Road exists opposite the site. The site lies in PTAL zone 3 – offering moderate public transport accessibility.
- 4.3 46 Bath Road is a white painted detached two storey building, with a hipped roofline over. To the rear is a hard surfaced courtyard garden area, enclosed via timber close board fencing. A manually operated metal sliding gate provides vehicle access to the rear of the site, offering unmarked parking for approximately three vehicles. The total site area extends to 0.037 hectares.
- 4.4 The property is currently occupied and used as a six room HMO (Use Class C4).
- 4.5 Pedestrian access is available via Bath Road to the front of the property and a public footpath runs to the western side of the site, between No.46 and the adjacent flatted building to the west (known as 42 – 48 Windsor Park Road).
- 4.6 Vehicle access is available from the rear, north, of the site. Access is via Windsor Park Road and a block paved cul de sac road constructed as a more recent extension to Windsor Park Road, serving two storey flatted blocks of housing. A number of properties on Bath Road take access off this block paved road via a rear gated access. The application site includes a sliding black metal gate entrance, serving the rear of the site.
- 4.7 Adjoining properties along Bath Road include residential two storey housing. Some houses have been converted to flats and HMO's. Buildings to the immediate rear on Windsor Park Road provide flatted accommodation.



Image 4: 46 Bath Road (frontage (taken April 2020))



Image 5: Rear elevation of 46 Bath Road viewed from the Windsor Park Avenue access (taken April 2020)

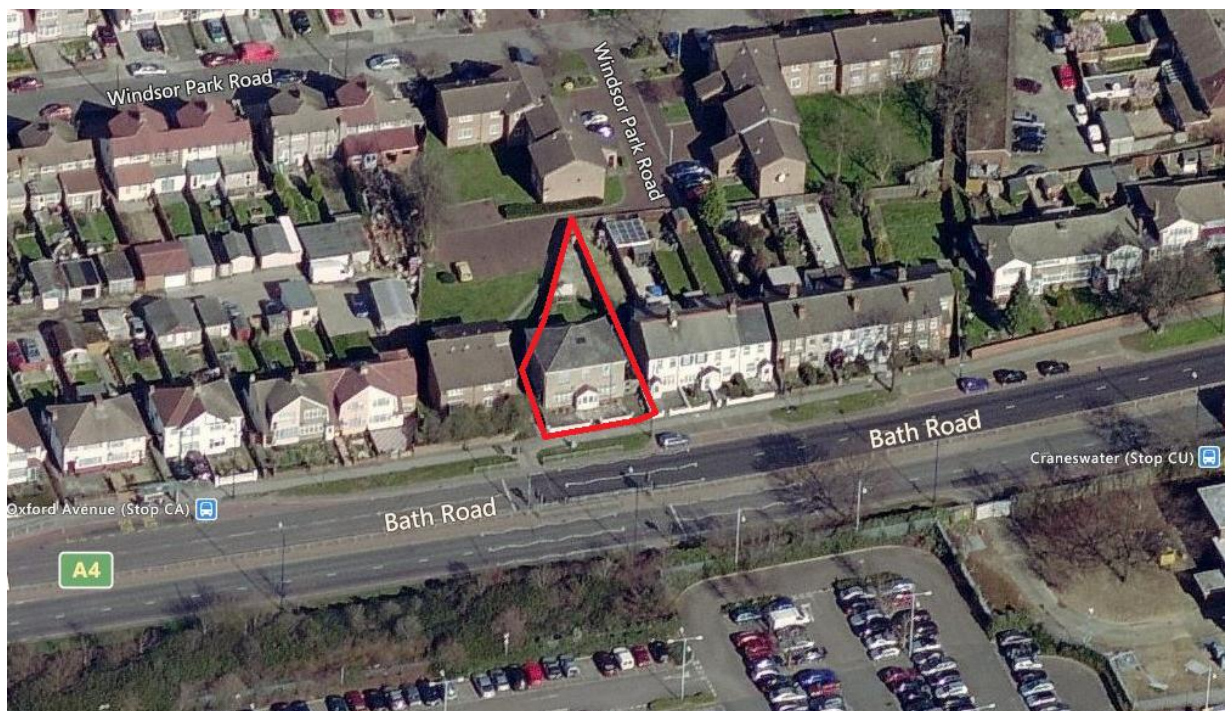


Image 6: Existing bird's eye view of 46 Bath Road with the site edged red (extract from Bing Maps)

5 Planning Policy

The National Planning Policy Framework 2021

- 5.1 Paragraphs 10 and 11 confirm that at the heart of the Framework is a presumption in favour of sustainable development, which means approving development proposals that accord with an up-to-date development plan without delay. Paragraph 59 reaffirms the Government's clear objective of significantly boosting the supply of housing.
- 5.2 Paragraph 69 relates to small and medium sized sites and recognises that they can make an important contribution to meeting the housing requirement of an area. It requires Councils to support the development of windfall sites through policies and decisions, giving greater weight to the benefits of using suitable sites within existing settlements for homes.
- 5.3 Paragraphs 119 and 120 seek to promote the effective use of land in meeting the need for homes. It adds that decision making should promote and support the development of under-utilised land and buildings. Paragraph 124 requires Councils to support development that makes efficient use of land, subject to consideration of criteria.
- 5.4 Section 12 relates to design. It confirms that good design is a key aspect of sustainable development and that decision making should ensure that developments are visually attractive as a result of good architecture, layout and appropriate landscaping.

The Hillingdon Local Plan

- 5.5 The Development Plan for this area includes; Part 1: Strategic Policies 2012 and Part 2: the Local Plan Part 2: Development Management Policies and Site allocations and Designations 2020 (adopted 16 January 2020 - since the refusal of application 24469/APP/2019/3265). The previous Part 2: saved policies of the UDP has been superseded.
- 5.6 Policy DMT2: highways impacts. This provides general highway requirements, including safe and efficient vehicular access, and protecting the safety of road users and residents.
- 5.7 Policy DMT6: vehicle parking, is relevant and requires development proposals to comply with parking standards. Varying of the requirements will only be agreed where this would not lead to a deleterious impact on street parking provision, congestion of local amenity.
- 5.8 Policy DMH5 houses in multiple occupation is relevant and seeks to ensure that all proposals for large HMO's have i) good accessibility to local amenities and public transport, ii) accord with accessible homes standards/provide satisfactory living conditions and iii) that there will be no adverse impact on the amenity of neighbouring properties or the character of the area.
- 5.9 Other policies include;
 - DMHB11 Design of new development
 - DMHB12 Streets and public realm
 - DMHB14 Trees and landscaping
 - DMHB16 Housing standards
 - DMHB18 Private outdoor amenity space

The London Plan 2021

- 5.10 A number of London Plan policies are generally relevant; however, the Hillingdon Local Plan is of primary relevance in considering this application. The London Plan policies are not set out in full here. However, attention is drawn to the car parking standards set out in the London Plan Policy T6 Table 10.3, which sets out maximum parking standards which are lower than the maximum standards set out in the Local Plan.

6 Use and the principle of development

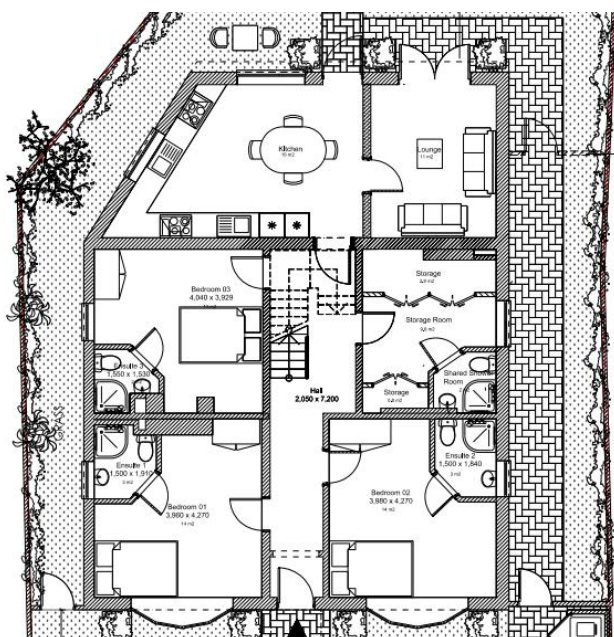
- 6.1 The site lies within the established built up urban area and is surrounded by residential development. The existing building is in use as a small HMO (Class C4). The proposed eight bedroom HMO use (Sui Generis) would retain the residential HMO use.
- 6.2 Policy DMH1: safeguarding existing housing seeks to resist the net loss of existing self contained housing unless the housing is replaced with at least equivalent residential floorspace.
- 6.3 Policy DMH5: Houses in Multiple Occupation, seeks to ensure that all proposals for large HMO's have i) good accessibility to local amenities and public transport, ii) accord with accessible homes standards/provide satisfactory living conditions and iii) that there will be no adverse impact on the amenity of neighbouring properties or the character of the area.
- 6.4 The site lies in an accessible location and public transport links exist opposite and adjacent to the site within 100 metres. The property is large enough to accommodate all eight bedrooms (detailed evaluation to follow in this report) and lies in a mixed residential area.
- 6.5 The proposed change from small HMO to large HMO (Sui Generis) is acceptable in principle and would make efficient and effective use of this large building and provide much needed shared living accommodation for which there is significant demand - particularly in a location such as this, close to public transport links. It is considered that the principle of the proposed use would accord with relevant Local Plan policy, as well as the London Plan and the Framework.
- 6.6 It is also highlighted that no objections were raised to the principle of the use of the dwelling as a large HMO in the previous appeal decision dated 1 March 2021 and the recent pre application response letter dated 20 August 2021.

7 Amount and Layout

- 7.1 The proposed development involves the conversion of the existing building, with no new extensions or additional floorspace proposed. The amount of physical development on the size will therefore not increase as part of the application. The existing front door entrance will be retained for use as the principal entrance into the building.
- 7.2 The proposed development would provide eight en-suite HMO bedrooms with shared lounge/kitchen/dining. The eight bedrooms are proposed for SINGLE PERSON occupancy, so there would not be more than eight people resident at the property at any time. The number of rooms can be readily accommodated within the building.
- 7.3 The proposed accommodation, including bedroom sizes, room heights, kitchen/living and bathroom provision, complies with the standard requirements for HMO's. Each bedroom would have a good standard of light, aspect and outlook, sufficient to provide an acceptable standard of amenity.

Room	Proposed GIA (sq m)
Living and kitchen	19 + 11 = 30 total
1 Ground floor	14.0 (+3.0 en-suite)
2 Ground floor	14.0 (+3.0 en-suite)
3 Ground floor	13.0 (+2.0 en-suite)
4 First floor	13.0 (+2.0 en-suite)
5 First floor	14.0 (+2.0 en-suite)
6 First floor	14.0 (+2.0 en-suite)
7 First floor	10.0 (+2.0 en-suite)
8 Second floor	12.0 (+3.0 en-suite)

- 7.4 Following the pre application process, the ground floor communal areas have been redesigned to address matters of amenity. The proposed ground floor plan (see extract below) shows that the rear kitchen/dining area, would be connected to a new lounge area for residents. This room would offer additional social space for occupiers, enhancing the standard of provision. As part of this, a new large rear facing glazed double door opening is also proposed, increasing light and aspect to this living space. The central side bedroom (formerly referred to as room 7 in the recent appeal) is to be retained as a shared ground floor bathroom and also provide storage cupboards for the management of the HMO.



**Image 7: Proposed ground floor plan layout – extract from drawing 04-001
(not to scale)**

- 7.5 The layout also allows for a communal rear garden area providing a minimum of 118 sq m of shared amenity space immediately to the rear of the building for use by future occupiers. The amenity space will be landscaped and contained from the car parking to ensure an attractive and useable space for residents (see drawing ref: LAN-001 and extract below). The amount and disposition of amenity space for the proposed eight room HMO use in the recent pre application response reference 24469/PRC/2021/126 was considered to be acceptable.

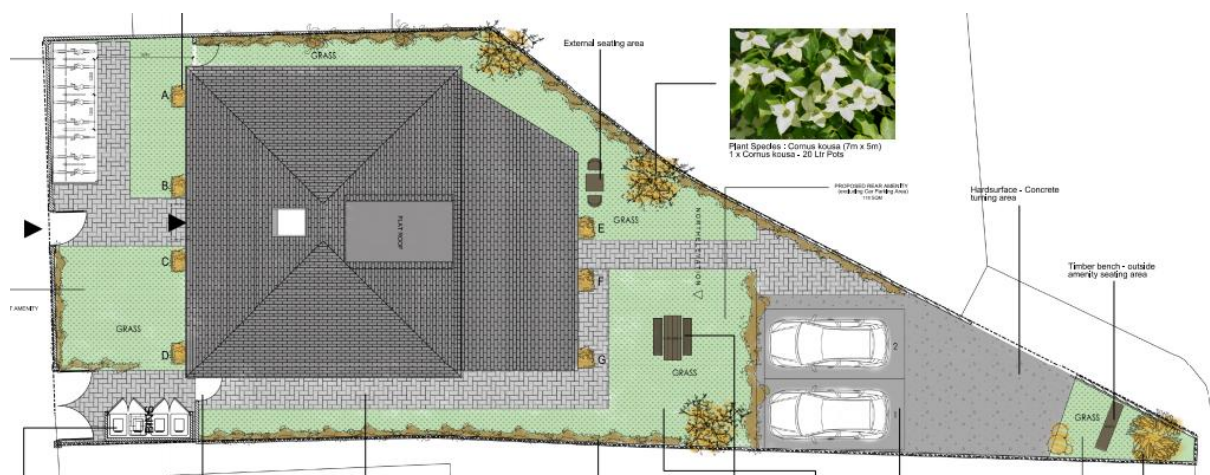


Image 8: Proposed site layout landscaping plan extract (drawing LAN-001)

- 7.6 The car parking provision of two parking spaces is considered to be adequate to meet the needs of the future occupiers and has been further reduced from the previous scheme in order to allow for an enlarged provision of amenity space. Low car ownership is anticipated and the property lies along a bus route, where bus stops are located to the site frontage. The site also lies in a PTAL Zone 3, where accessibility is good. No objections were raised regarding the proposed car parking provision/layout in the recent pre application response dated 20 August 2021.
- 7.7 Cycle storage racks are currently provided to the side of the building. However, a new covered secure cycle storage shed is proposed as part of this application. The plans show that this will be provided as a low level enclosed structure to the front of the site and provide eight secure cycle storage spaces. Drawings 04-001, 06-001 and LAN-001 provide additional information regarding size, position and materials. The proposed store would be accessible and comply with policy requirements. The Applicant would be willing to accept a pre commencement condition requiring the submission of further details, if considered necessary.
- 7.8 Bin storage will be adjacent to the south eastern side the property (frontage), with bins being taken to the road frontage on collection day. Details of the bin enclosure are included on drawing LAN-001, however, further details can be required to be submitted for approval by condition, if considered necessary.
- 7.9 It is considered that the proposed amount of development and layout of the accommodation is appropriate in this location and can satisfactorily be accommodated upon the site.

Impact upon residential amenity of adjoining properties

- 7.10 Given that the size of the property is not changing and no external changes are proposed, it is considered that the proposal would not adversely affect either the light, aspect or outlook of the adjacent properties and would have an acceptable relationship with those neighbouring properties.
- 7.11 The proposed Sui Generis use is a residential use and, whilst more intensive than a C3 or C4 use, it will not be significantly more intensive than the lawful C4 use, which provides six HMO rooms. Furthermore, as previously indicated, each room would be let as single person occupancy only – including professionals working locally at the airport and associated facilities. The premises are to be kept clean, tidy and provide a high standard of accommodation. The proposed addition of two more rooms (from six to eight rooms) would not materially or harmfully impact upon the residential amenities of adjoining residential properties.
- 7.12 The property would retain a rear garden with sufficient depth to avoid overlooking of any properties or gardens to the rear of the site.
- 7.13 It is considered that the proposed development would not adversely affect the amenities of adjoining properties. No objections were raised in respect of amenities and neighbouring properties in the recent pre application report dated 20 August 2021.

8 Scale and appearance

- 8.1 The external elevations of the existing building will not be affected by the proposal, other than the proposed new rear glazed patio door opening. The building will otherwise retain its existing character and appearance. The C4 HMO use has not changed the scale or appearance of the property or street character and the proposed large HMO use, with eight bedrooms, will not have any material effect on the appearance of the building or street scene.
- 8.2 The external spaces to the front and rear of the property will not materially change as part of the current application, with the front garden area retained, along with the bin and cycle stores. The existing rear courtyard parking area will, however, be substantially enhanced through the inclusion of new landscaping and amenity space.
- 8.3 The proposed scale and appearance of the proposed development is considered to be appropriate and compatible with the existing street scene. The proposed development is considered to be in accordance with Policy DMHD1 and DMHB11 of the Local Plan Part 2 in relation to design considerations.

9 Landscaping

- 9.1 The site currently includes very limited landscaping, with the entirety of the rear area being concrete surfaced. The application proposes significant enhancements to the level of landscaping on the site, with new soft landscaping, including grassed areas and shrub and tree planting to beds and borders. The application has been submitted with a proposed detailed landscaping scheme, which shows the details of the hard and soft landscaping. Specification details of the species and size of plants are also set out.
- 9.2 Importantly, the proposed landscaping scheme will enable an attractive and enclosed area of shared private amenity space to the rear of the building for use by future occupiers. The way in which the area is designed to be used, along with its min 118 sq m of area, is considered to be sufficient to meet the needs of future occupiers.
- 9.3 It is also highlighted that the recent pre application response letter concluded that the proposed level of provision and layout would be acceptable.

10 Access and parking statement

- 10.1 The site currently has an existing pedestrian access from the site frontage on Bath Road. This will be unaffected by the proposed development and will be retained for future use.
- 10.2 The existing rear vehicular access off Windsor Park Road provides access to the existing rear parking courtyard area. This black metal sliding gate (manually operated) is to be retained for use and two parking spaces laid out and made available for use by occupiers.
- 10.3 It is highlighted that the recently adopted London Plan (2021) states that car free developments should be the starting point for all development proposals that are well connected by public transport and 'car-lite' elsewhere. Policy T6 of the London Plan refers. It is highlighted that the site lies in close proximity to public transport links along Bath Road and lies within PTAL Zone 3. The pre application response report dated 20 August 2021 did not raise any objection to the proposal on this basis.
- 10.4 A swept path drawing (reference 2552-001) shows that the spaces have an acceptable layout.
- 10.5 The full requirement of eight secure cycle spaces (one per room) are provided to the front of the property. A new covered secure cycle storage shed is proposed as part of this application. The plans show that this will be provided as a low level enclosed structure to the front of the site and provide eight secure cycle storage spaces. Drawings 04-001, 06-001 and LAN-001 provide additional information regarding size, position and materials. The proposed store would be accessible and comply with policy requirements. The Applicant would be willing to accept a pre commencement condition requiring the submission of further details, if considered necessary.
- 10.6 It is considered that the proposed car parking and cycle storage provision and layout is acceptable and would meet the needs of the proposed development.

11 Community Infrastructure Levy and Section 106

- 11.1 A CIL questions form has been submitted with the application. Mayoral CIL and Hillingdon's CIL are relevant. The development is broadly CIL liable, although no CIL will be payable given that no additional floorspace will be created by the development. A CIL questions form has been submitted with the application.
- 11.2 It is also understood that the proposal does not trigger a need for affordable housing or other Section 106 financial contribution.

12 Conclusions

- 12.1 This application seeks permission for the change of use of the building to an eight bedroom large HMO (Sui Generis use class). The property is currently in C4 HMO use (six bedrooms). The proposal therefore seeks an increase from a six room to an eight room HMO. Each room will be available for single person occupancy only.
- 12.2 The existing building is to be retained and no external alternations to the building are proposed, other than a new glazed double door opening to the rear of the building.
- 12.3 The previous site planning history, including recent application and appeal for a ten room HMO (dismissed) and pre application submission dated 20 August 2021 have significantly informed and guided this further application.
- 12.4 The Council's recent pre application report set out support for the proposed eight room HMO, subject to details regarding internal room layout (outlook and light for the communal spaces) and details regarding cycle storage.
- 12.5 This application proposes a number of changes from the previous 10 room scheme and pre application submission as follows;
- Reduction from ten HMO rooms to eight.
 - Reduction in car parking from three to two spaces.
 - Enlargement of shared amenity space (118 sq m to the rear of the building)
 - Enlarged shared communal space, including a new lounge area with new glazed door overlooking the rear amenity area.
 - Full details of hard and soft landscaping.
 - New cycle and bin store arrangements to meet the Council's standards.
- 12.6 The proposed parking provision is considered acceptable in this accessible location and takes into account the low levels of car ownership anticipated. The car parking provision accords with the requirements of the London Plan.
- 12.7 The proposal will retain the character and appearance of the dwelling and the proposed use will make a significant contribution towards housing supply and choice, for which there is demonstrable demand.
- 12.8 The proposed rooms and shared communal rooms will each meet required standards and provide a good standard of residential accommodation. Each room will have a good standard of light and outlook, as well as access to the shared kitchen/dining/living space and amenity space. Bin storage and cycle storage provision have been included within the layout.
- 12.9 This further revised application is considered to be acceptable and to address the matters previously raised in the recent pre application report. The proposal would accord with the Development Plan, including the Hillingdon Local Plan Part 2, as well as the London Plan and NPPF. No unacceptable harm would arise from the proposed development.
- 12.10 The Applicant is willing to discuss the scheme with the Council during the course of the application and the need for conditions to control the development.

SK 2/11/2021

Appendix 1:

Pre application 24469/PRC/2021 – Officer response letter dated 20 August 2021



Mrs S King
Akt Planning + Architecture
Kingswood, Berrick Salome
Wallingford
Oxon OX10 6JQ

Planning Applications Team
London Borough of Hillingdon
Civic Centre, High Street
Uxbridge UB8 1UW

Tel: 01895 250230
Case Officer: Nicola Taplin
Email: ntaplin@hillington.gov.uk
Date: 20th August 2021
Our Ref: 24469/PRC/2021/126

Dear Mrs S King

RE: Change use from 6 room small HMO (Class C4) to large 8 or 9 room HMO (sui generis). Parking and landscaping
SITE: 46 Bath Road Harlington

I refer to your request for pre-application planning advice dated 28.5.21 and our subsequent meeting on 13 August 2021 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration:

Plan Numbers: 03-002 - received 28 May 2021
03-001 - received 28 May 2021
05-001 - received 28 May 2021
02-001 rev A option A - received 28 May 2021
02-002 Version B - received 28 May 2021
2552-001 swept paths - received 28 May 2021
06-001 - received 28 May 2021
04-002 - received 21 May 2021
02-001 - received 28 May 2021
01-001 - received 28 May 2021
04-001 - received 28 May 2021

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.

The Site and Surrounds

The application site relates to a detached two storey dwellinghouse located on the north side of Bath Road. The application property is set back from the adjacent highway with a front garden laid in hardstanding and a low brick wall as boundary treatment. Currently, there are 2 off-street parking spaces for the property, located to the rear with access from Windsor Park Road.

The Proposal

The application seeks pre-application advice with regard to the proposed change of use from 6 room small HMO (Class C4) to large 9 room HMO (sui generis), parking and landscaping.

Planning Policy

The proposed development would be assessed against 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:

Part 1 Policies:

PT1.BE1 (2012) Built Environment

Other Policies:

DMH 5	Houses in Multiple Occupation
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 16	Housing Standards
DMHB 18	Private Outdoor Amenity Space
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP D4	(2021) Delivering good design
LPP D6	(2021) Housing quality and standards

Main Planning Issues

1. Principle of development

The principle of the development

Policy DMH 5 states 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.

The proposal would not constitute an over-concentration of HMO or sui-generis uses in the area in accordance with the above policy. The accommodation would not result in an over-intensive use of the site to the detriment of the amenities of adjoining occupiers. The site lies within PTAL Zone 3, located next to the main A4 Bath Road, which offers regular bus services. Bus stops exist to the immediate right and left of the application site along Bath Road. The application site has a good accessibility to local amenities and services such as GP surgeries, schools, shops, etc.. The proposed development by reason of its design and location would generally accord with criteria i) and iii) of the above policy. The issues relating to living conditions are addressed in the sections below.

2. Design

The proposal does not involve any extensions to this property. The landscaping and parking layout could, in the event of a formal submission, be controlled by way of condition.

3. Amenity

With regard to the residential living conditions proposed, at least one ground floor habitable room would be over 10 square metres other than a kitchen, for communal living purposes, in both the 8 and the 9 room scheme. However, concerns would be raised in terms of the

quality of the living accommodation provided for the 9 room scheme, given that the living room would have a very poor level of light and outlook. This room would be served by a single side facing window which would look out onto the boundary fence and flank wall of the adjoining property a short distance away.

It is considered that the quality of living accommodation would be poor and could not be supported by the Council. The applicant is encouraged to open up the lounge area into the dining area and to provide additional rear facing windows to provide light and outlook to this communal space to address this concern.

Concerns were previously raised by the appeal Inspector (Appeal Ref: APP/R5510/W/20/3262001) with regard to the provision of outdoor amenity space.

Policy DMHB 18 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) requires new developments to provide good quality and useable private outdoor amenity space in accordance with the Council's standards (as per Table 5.2). Dwellings with four or more bedrooms require a minimum provision of 100sqm of external amenity space.

The proposal would provide some 115 sqm of outdoor amenity space to the sides and rear of the property. However, the space to the rear of the property would also be used for car parking. It is considered, on balance, that this provision, along with the less private front garden and nearby public amenity space within walking distance, would be acceptable and, subject to appropriate landscaping conditions, would address the appeal Inspector's previous concerns.

4. Highways

From the information provided the existing dwelling (use class C3) is being let out as a small HMO (use class C4) with 6 HMO licensed rooms with an existing vehicle access via a sliding gate to the rear off Windsor Park Road providing unmarked/informal parking stated by the applicant for 3 vehicles. The proposal is to increase the number of rooms to 9 but with 2 on-site formal car parking spaces. The site achieves a PTAL rating of 3, which means it has average/reasonable accessibility to public transport.

The applicant has submitted plans (drwg nos 02-001 rev A and 02-002) showing 2 formal parking spaces at the rear of the site.

The Mayor of London adopted a new and revised London Plan in March 2021, consequently the car parking standards set out in the London Plan 2021 which are restricted in line with levels of existing and future public transport accessibility and connectivity, take precedence over those of the Local Development Plans of Local Authorities except where Local Development Plans specify lower local maximum standards.

The maximum residential car parking standards set out in the London Plan Policy T6: Table 10.3 are lower than the maximum parking standards set out in the Hillingdon Local Plan: Part 2 Development Management Policies (2020) and so the London Plan parking standards take precedent.

The maximum parking standards outlined in the London Plan Table 10.3: Outer London PTAL 2-3, 3+ beds it is up to 1 space per dwelling, whilst the provision of 2 car parking spaces is in excess of the parking standard. However, given the Use Classes Order permits authorised change of use from C3 to C4, no planning permission was sought for this change of use and therefore this level of parking is existing.

The proposed cycle storage facility, the parking provision and layout and aisle path are substandard and should be guided by the Councils Parking SPD or the London Plan or the guidance contained in the London Cycling Design Standards.

Each cycle space should be accessible and not obstructed by other cycles in the store and access aisles should have a minimum width of 1.2m.

RECOMMENDATION:

Cycle parking should be designed and laid out in accordance with appropriate guidance and the development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people. The applicant is required to show all dimensions of the store annotated on any deposited plan.

5. Other

No other issues raised.

6. Planning Obligation and CIL (Mayor and LBH)

N/A

7. Application Submission

The Council has an adopted Local Planning Validation Checklist (June 2020) which is available on the Council's website.

The documents to be submitted in support of a future planning application are likely to include:

Application Form;
Location Plan;
Existing Site Plan;
Existing Floor Plans;
Existing Elevations;
Proposed Site Plan;
Proposed Floor Plans;
Proposed Elevations; and
Planning Statement.

8. Conclusion

The proposed 8 room scheme is considered, on balance, to have addressed the appeal Inspector's concerns in relation to a more intensive HMO use of the site and is likely to be supported by the Council. However, the applicant is advised that the Council would be unlikely to support the proposed 9 room scheme because this would be considered to represent an overdevelopment of the site resulting in a poor standard of residential amenity for the future occupants of the HMO.

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

Thank you for entering into the Councils pre-application advice service and I trust you have found this service of assistance.

**Nicola Taplin
Planning Officer
Major Applications Team
London Borough of Hillingdon**

Planning Guarantee

For complex applications which are likely to exceed the statutory timeframes, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all Planning Performance Agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined on a site by site basis.

Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.