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Design and Access Statement



42 Doghurst Avenue, Harlington UB3 5BJ

BMD/1259

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Introduction

This Design and Access Statement has been prepared in support of a full planning application for the following proposal:

Change of use of the existing Class C3 dwellinghouse to a 6 Bed 6 Person C4 HMO

Planning permission Ref: 34611/APP/2006/3010 for the proposed erection of two storey side and part two storey part single storey rear extension was granted on 19-12-06

A substantial start was made on the construction of the approved extension and work is currently under way to complete the extension. Building Control Ref: 34611/PA/2007/93

The property was previously in use as a HMO with 4 non-self-contained flats Ref: 34611/84/823

This Design and Access Statement should be read in conjunction with the following submitted documents:

- i) Application drawings
- ii) PMSE London Ltd HMO Letter
- iii) Previous HMO Planning Permission Ref: 34611/84/823
- iv) HMO Management and Supervision Plan

2 THE SITE

The application site comprises a two-storey semi-detached residential property located at 42 Doghurst Avenue, Harlington UB3 5BJ

The property is currently in lawful Class C3 residential use, as defined by the Town and Country Planning (Use Classes) Order.

The surrounding area is predominantly residential in character and consists mainly of semi-detached dwellings, generally set back from the public highway.

The site is not located within a conservation area and the building is not listed.

The proposal would not result in any changes to the existing parking provision which has space for 3 cars on the front driveway.

The site is within a Controlled Parking Zone (CPZ) with residents permit parking from 9am – 5pm

The location benefits from reasonable access to public transport and local facilities, with a Public Transport Accessibility Level (PTAL) of 3.

Regular bus services operate along the Bath Road



3 THE RELEVANT PLANNING POLICIES:

The proposal has been assessed against the Hillingdon Local Plan: Part Two – Development Management Policies (adopted 16 January 2020) and the London Plan (2021).

Paragraphs 4.13–4.14 of the Local Plan recognise that HMOs can contribute to the supply of lowercost accommodation, particularly for students, young people, and those on lower incomes. At the same time, the Plan acknowledges that intensive occupation of former family dwellings can give rise to adverse impacts on residential amenity if not appropriately controlled, including parking pressure, loss of garden space, noise, refuse generation, and changes to the character of residential areas.

The policy response to these concerns is set out under Policy DMH 5 – Houses in Multiple Occupation and Student Accommodation, which states:

A) In all parts of the Borough, proposals for HMOs will be required to demonstrate that:

- i) there is good accessibility to local amenities and public transport;
- ii) satisfactory living conditions are provided for intended occupiers; and
- iii) there will be no adverse impact on the amenity of neighbouring properties or the character of the area.

B) In wards covered by an Article 4 Direction, planning applications for change of use from Class C3 to Class C4 or Sui Generis HMO will only be permitted:

- i) where less than 20% of properties within the neighbourhood area are or would be HMOs;
- ii) where less than 10% of properties are HMOs within Conservation Areas;
- iii) where less than 15% of properties within 100 metres of a street length are 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 does not harm residential amenity.

4 THE PROPOSAL

The current proposal seeks planning permission for a change of use from Class C3 (dwellinghouse) to Class C4 (house in multiple occupation).

The development will incorporate the planning permission Ref: 34611/APP/2006/3010 for the proposed erection of two storey side and part two storey part single storey rear extension which is currently under construction.

On 11 December 2025, the London Borough of Hillingdon introduced a borough-wide Article 4 Direction, removing permitted development rights for changes of use from Class C3 to Class C4.

As a result, express planning permission is required for the proposed change of use.

This full planning application is therefore submitted to seek consent for the proposed Class C4 HMO use and is assessed against the relevant policies of the Hillingdon Local Plan, with particular regard to Policy DMH 5 (Houses in Multiple Occupation).

Planning permission is sought for a six-bedroom, six-person Class C4 HMO, with the following facilities proposed:

One shared kitchen measuring approximately 10.5 m², providing sufficient cooking, food preparation and facilities for the intended level of occupancy.

One shared living / dining room measuring approximately 20 m²

Six en-suite bedrooms, each designed for single occupancy only

Secure cycle storage provision for up to six bicycles

Bin storage for general and recyclable waste

Approximately 140 m² of rear garden space retained and available as shared outdoor amenity space

The proposal represents a small-scale and low-intensity HMO, with occupancy levels strictly limited to six persons. The scheme is supported by an appropriate internal layout, adequate internal and external amenity provision.

The HMO shall be managed and supervised by PMSE London Ltd Management Agency. Local planning policy acknowledges that houses in multiple occupation can make a positive contribution to housing supply, particularly by providing more affordable accommodation for smaller households. At the same time, policy seeks to ensure that such accommodation is well designed, appropriately located, and effectively managed, so as to safeguard residential amenity and the character of established residential areas. These matters are addressed in detail in the sections that follow.

The proposal has been designed to respond positively to these considerations, including:

Retention of existing on-site car parking, together with the provision of secure cycle storage, to support sustainable travel choices;

Retention of the rear garden and existing boundary treatments, safeguarding privacy and outlook for both future occupiers and neighbouring residents;

All external alterations forming part of the proposal have already been approved by the Council ensuring that the character and appearance of the dwelling and the wider street scene are preserved; and

Provision of dedicated refuse storage, designed to operate in accordance with relevant planning and licensing standards.

5 AMENITY PROVISION AND DEVELOPMENT DENSITY

5.1 INDOOR AMENITY SPACE

The adopted Hillingdon Local Plan does not prescribe minimum internal communal space standards for houses in multiple occupation. In the absence of adopted quantitative standards, regard has been had, for completeness, to paragraph 3.9 of the former HMO Supplementary Planning Guidance (2004), which advised the provision of a communal habitable room exceeding 10 m². Whilst this guidance is no longer adopted policy, it remains a material reference point in understanding the Council's historic approach to assessing communal amenity provision. Furthermore, it is noted that, through recent decision-making within the borough, similar or smaller communal arrangements have been assessed as acceptable, including in cases involving larger HMOs, where overall amenity provision is adequate.

The proposal provides a shared kitchen of 10.5m², together with a separate shared living room / dining area of 20 m². Total 30.5 m²

Taken together, these spaces provide a suitable level of internal communal amenity for the proposed six-person occupancy, comfortably exceeding the threshold suggested by historic guidance and aligning with the Council's established decision-making approach.

Accordingly, the proposed internal amenity provision is considered to be appropriate in scale and layout, and sufficient to support the use of the property as a small Class C4 HMO without resulting in overcrowding or harm to the living conditions of future occupiers.

5.2 OUTDOOR AMENITY SPACE

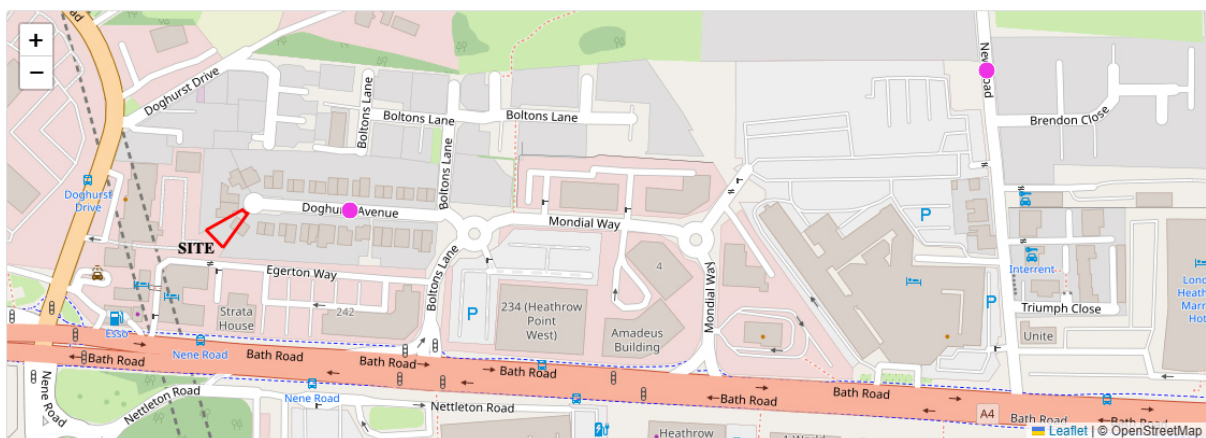
Policy DMH (paragraphs 5.68–5.69) requires sufficient private outdoor amenity space without setting a fixed quantitative standard. The proposal provides approximately 140 m² of shared rear garden space, which is considered generous and appropriate for the scale of the development.

5.3 HMO CONCENTRATION ANALYSIS

All figures are derived from the Council's HMO Register

Properties within 100 metres of the street length

13 Doghurst Avenue 6 Bed HMO 32 Doghurst Avenue 5 Bed HMO



There are 36 properties on Doghurst Avenue 2 of which are currently on the HMO Register List.
This equates to 5.56%

Should planning permission be granted for the new HMO there would be 3 HMO's which equates to 8.33 %

Less than 15% of properties within 100 metres of the street length are HMOs and therefore in accordance with council policy.

In relation to Policy DMH 5(B)(iv), which addresses matters of car parking provision, waste and recycling storage, and the retention of private amenity space, it is demonstrated through the foregoing assessment and the submitted drawings that the proposal fully complies with the relevant planning standards. The development would retain adequate parking arrangements, provide appropriate refuse and recycling storage, safeguard usable private amenity space for future occupiers, and would not result in the loss of a functional garage (where applicable). Accordingly, the proposal accords with the requirements of Policy DMH 5(B)(iv).

6 LIVING CONDITIONS FOR FUTURE OCCUPIERS

The proposed development shall operate subject to a dedicated management framework by PMSE London Ltd to ensure that the use of the property would not result in adverse impacts on the living conditions of future occupiers or the residential amenity of neighbouring properties. A HMO Management and Supervision Plan has been provided by PMSE London Ltd

This document sets out clear arrangements for the day-to-day management of the property, including occupancy control, refuse management, maintenance, and neighbour liaison, ensuring that the HMO would be operated responsibly and in full compliance with relevant statutory and licensing requirements.

The property is physically capable of accommodating the proposed level of occupation in accordance with prevailing housing and space standards, and the scheme restricts occupation to a maximum of six persons, thereby representing a controlled and low-intensity form of HMO use.

Furthermore, the implementation of the provided HMO Management and Supervision Plan together with compliance with the mandatory HMO licensing regime under the Housing Act 2004, would ensure that the property is properly managed at all times.

These measures provide additional safeguards to ensure that the use would not give rise to adverse effects on neighbouring residential amenity or the character of the area.

Accordingly, it is concluded that the proposal would provide satisfactory living conditions for future occupiers and would not result in material harm to the amenities of adjoining residents.

7 IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA

The proposed development would not result in harm to the character or appearance of the surrounding area. The proposal incorporates a previous permission, which have already been assessed by the Council in respect of their relationship with neighbouring properties and the wider street scene, and were found to preserve the established scale, form, and architectural appearance of the dwelling.

No further external alterations are proposed beyond those already approved.

As such, the approved built form represents the established baseline against which the proposed change of use is assessed.

The existing private rear garden would be retained in full and utilised as shared amenity space for future occupiers. The retention of this garden space, together with existing boundary treatments, ensures that the prevailing suburban residential character of the area is maintained and that no adverse visual or townscape impacts would arise as a result of the proposal.

The development has been assessed against the relevant policies of the Hillingdon Local Plan: Part Two – Development Management Policies (2020). In particular, Policy DMHB 11 (Design and Appearance of New Development) requires development to be sympathetic to the character of its surroundings, while Policy DMH 5 (Houses in Multiple Occupation) seeks to ensure that changes of use to HMOs do not result in harm to the character or amenity of residential areas.

Given that the proposal relies on an already approved external appearance and would retain existing garden boundaries and landscaping, it is considered to accord fully with the design and character objectives of Policy DMHB 11.

Furthermore, the controlled scale of occupation, together with the absence of any physical or visual intensification of the site, ensures compliance with the character-related criteria of Policy DMH 5. In terms of residential amenity, Policy DMH 5 requires that HMO proposals do not give rise to unacceptable impacts relating to noise, disturbance, or the general living environment of neighbouring occupiers.

In this case, the dwelling is of sufficient size to accommodate the proposed level of occupation and shall be supported by a comprehensive HMO Management and Supervision Plan, which shall provide robust controls over occupancy levels, resident behaviour, refuse management, and ongoing maintenance.

The proposal also incorporates shared communal kitchen, dining, and living spaces, representing a qualitative enhancement to the living environment for future occupiers. While such provision is not expressly required by planning policy for Class C4 HMOs, its inclusion promotes balanced internal living arrangements, reduces pressure on individual bedrooms, and assists in mitigating the potential for noise or disturbance.

In addition, the internal layout complies with prevailing HMO licensing standards, including the provision of an appropriate ratio of sanitary facilities to occupiers and adequate kitchen facilities to serve the proposed number of residents. These matters are further regulated under the Housing Act 2004 through the mandatory HMO licensing regime, providing an additional layer of control beyond the planning system.

Having regard to the absence of additional external changes, the retention of amenity space, the controlled intensity of use, and the proposed management arrangements, it is concluded that the proposal would preserve the character and appearance of the area and would not result in harm to the residential amenity of neighbouring properties. The development therefore accords with the relevant policies of the Hillingdon Local Plan, the London Plan, and the objectives underpinning the borough-wide Article 4 Direction.

8 TRANSPORTATION & PARKING

The existing property benefits from 3 off-street parking spaces.

The site is subject to a Controlled Parking Zone (CPZ).

The London Plan states that there should be no general car parking for HMO developments apart from disabled persons' parking.

As part of the proposal, the existing 3 off-street parking space could be retained, which accords with the maximum car parking standards of 1 space per unit as set out in the Hillingdon Local Plan: Part Two (2020)

Alternatively, 1 disabled parking space could be provided in accordance with the London Plan.

HOUSES IN MULTIPLE OCCUPATION	
For a HMO with up to 6 occupants: 1 space per 2 occupants. For HMOs over 6 occupants, car parking requirements will be assessed through a transport appraisal and travel plan.	1 per occupant

On this basis, the level of car parking provision is considered appropriate for the proposed use and would not give rise to adverse impacts on highway safety or on-street parking conditions.

A BG Syncev EVS 7G-02 7.4kw wifi & smart EV charger or similar is proposed at the front of the property.

To promote sustainable modes of travel, the proposal also includes the provision of secure cycle storage for up to 6 bicycles, in accordance with the requirements of the Hillingdon Local Plan: Part Two (2020) and the London Plan cycle parking standards, as set out in Table 10.2 of the London Plan (2021).

The application site is in close proximity to the bath road and bus stops for the No's 81, 105, 111, 222 and 423 buses

Accordingly, the proposal is considered acceptable in transport and parking terms and is consistent with the objectives of the development plan to encourage sustainable travel while avoiding undue reliance on private car use.

9 REFUSE STORAGE

The proposal includes the provision of a bin store for general and recyclable waste.

Refuse and recycling collection would be carried out in accordance with the London Borough of Hillingdon's adopted waste collection schedules and arrangements.

The proposed refuse storage provision is considered sufficient to serve the needs of the development and would be managed in accordance with the provided HMO Management and Supervision Plan, ensuring that bins are stored appropriately and presented for collection only on designated collection days.

As such, the proposal would not give rise to adverse impacts on visual amenity or neighbouring residential conditions.

CONCLUSION

National planning policy supports the creation and maintenance of balanced and sustainable communities, capable of accommodating a range of household types and housing needs.

Within this context, Houses in Multiple Occupation (HMOs) form an established and important part of the housing stock, provided they are appropriately located, well managed, and do not result in harmful concentrations.

As demonstrated by the preceding assessment and supporting evidence, the application site is not located within an area of high HMO concentration when assessed against the thresholds set out in Policy DMH 5.

The proposal has been carefully designed to comply with the Council's adopted planning policies and prevailing HMO standards, including those relating to internal space, amenity provision, parking, refuse storage, and management arrangements.

The development involves no external alterations, retains adequate private amenity space, and would operate subject to the HMO Management and Site Supervision Plan by PMSE London Ltd, ensuring responsible occupation and safeguarding neighbouring residential amenity.

Having regard to the controlled scale of the proposal, the absence of harm to the character and appearance of the area, and full compliance with planning and housing regulatory requirements, it is concluded that the proposed change of use represents a sustainable and acceptable form of development. The proposal, therefore, accords with the objectives of the development plan and should be considered acceptable to the Local Planning Authority on its planning merits.