



Planning Statement

105 HAYES END ROAD, HAYES, UB4 8EL

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Introduction

This Planning Statement has been prepared by Excel Planning in support of a revised application for an eight-bedroom, eight-person HMO at 105 Hayes End Road, Hayes, UB4 8EL.

The proposal follows the refusal of the previous nine-person HMO application on 7 July 2026. A ground-floor bedroom has been given up to create a separate communal lounge, and occupation is now limited to eight people. The kitchen and dining room has also been enlarged. These changes provide more shared space for fewer residents and address the Council's concern about the standard of accommodation.

The rear dormer has been narrowed to reduce its bulk. Natural screening is also proposed outside the two rear ground-floor bedrooms, providing privacy from the communal garden while retaining direct access. This statement explains these changes and the case for granting permission.

Site and Surrounding Area

The application property is a semi-detached house with an existing two-storey side extension, front parking area and rear garden. The surrounding area is residential. The main considerations are the relationship with the adjoining house, the scale of the extensions and the effect of the proposed occupation.

The previous assessment established several points in the proposal's favour. The Council accepted the bedroom sizes, daylight and outlook. It considered the rear garden, exceeding 100 m², sufficient for nine occupants. There was no highways reason for refusal, subject to the detailed arrangements identified in the report.

The extensions were not found to cause significant loss of light or overlooking. The revisions therefore concentrate on the matters that led to refusal: shared living space, bedroom privacy, the intensity of occupation and the combined bulk of the building.



Relevant Planning History

Application 35665/APP/2024/2087 was refused on 8 October 2024. It proposed conversion to two flats, ground- and first-floor rear extensions, garage conversion, a hip-to-gable alteration, rear dormer and rooflights. The refusal concerned cumulative bulk, tandem parking and overdevelopment, including insufficient amenity provision.

On 30 January 2025, a certificate of lawful proposed development was issued under reference 35665/APP/2024/3155 for a roof conversion, rear dormer and two front rooflights. The certificate relates to the development shown on the certified drawings. It does not authorise a first-floor rear extension or the proposed HMO use.

Planning permission 35665/APP/2024/3154 was granted on 13 March 2025 for conversion into two flats, with garage conversion, a single-storey rear extension, a smaller dormer, rooflights and associated alterations. The hip-to-gable alteration and first-floor rear extension had been removed from that scheme.

The approved accommodation comprised a three-bedroom, four-person ground-floor flat and a two-bedroom, three-person upper maisonette. The Council therefore assessed accommodation for seven people across two households. The ground-floor flat had the rear garden. The upper flat's lack of separate outdoor space was accepted on balance, taking account of its accommodation and nearby open space. Retaining a three-bedroom family unit also formed part of the Council's assessment.

Application 35665/APP/2025/1532 was approved on 4 August 2025. It discharged condition 3 of the flats permission, relating to landscaping. This approval did not discharge all conditions or approve departures from the permitted building.

The subsequent nine-person HMO application, 35665/APP/2026/612, included the rear extensions, dormer and rooflights and was partly retrospective. It was refused on four grounds: loss of family housing and effects on character; intensity of occupation and disturbance; cumulative building bulk; and inadequate communal accommodation and rear-bedroom privacy.



The Council's report also referred to enforcement case ENF/584/25. Works have commenced, but the information available does not establish that two lawful flats were completed and occupied before any HMO use began. This application therefore does not rely on the earlier assertion that the property already comprised two lawful HMOs. The works and use now proposed should be assessed against the relevant policies and the site's planning history.

Proposed Development

The property will provide eight bedrooms for a maximum of eight occupants. Three bedrooms are on the ground floor, four on the first floor and one in the loft. Each is intended for single occupation and has its own en-suite. The building has a total gross internal area of 183.60 m².

The width of the rear dormer has been reduced to make it less dominant when viewed with the extensions below. The first-floor rear projection remains part of the proposal and is considered in the design assessment.

At the rear, planting will form a private threshold outside the two ground-floor bedrooms. It will discourage other residents from passing or sitting immediately outside the bedroom windows, while leaving a route for the occupants to reach the garden directly.

The main improvement is the ground-floor communal accommodation. A 12.70 m² lounge at the front of the house provides a separate place to sit and relax. A 22.10 m² kitchen and dining room opens onto the rear garden. Together, these rooms provide 34.80 m² of shared accommodation for the eight residents.

PLANNING POLICY CONTEXT

The development plan comprises the London Plan 2021, Hillingdon Local Plan Part 1 and the Development Management Policies adopted in January 2020.



The main local policies are DMH 1, concerning the loss of residential accommodation; DMH 2, concerning housing mix; and DMH 5, concerning HMOs. Policies DMHB 11, DMHB 12 and DMHD 1 address design and amenity, while DMHB 16 and DMHB 18 concern internal accommodation and outdoor space. The Council's transport policies also apply.

DMH 1 includes provision for equivalent residential floorspace, and its supporting text refers to HMO accommodation. DMH 2 requires housing mix to respond to local need. DMH 5 sets criteria for assessing HMOs, including access, living conditions, neighbouring amenity and character. These policies should be read together when considering the proposed change of use.

London Plan Policy H9 recognises the role of HMOs in meeting housing needs. Policy H10 addresses housing mix, with Policies D3 and D6 relevant to design and accommodation quality and D14 to noise. The recognition of HMOs as part of London's housing provision supports consideration of the use in principle; it does not establish that the existing use of this site is lawful.

The National Planning Policy Framework published on 17 August 2026 applies to decisions from its publication. The current application should therefore be considered against that version, rather than the paragraph references used in the July refusal. Policy P3 addresses living conditions and pollution, including noise and appropriate mitigation.

Hillingdon's borough-wide Article 4 direction took effect on 11 December 2025. It brings relevant changes from C3 dwellings to small C4 HMOs within planning control. The proposed eight-person HMO is a sui generis use and requires planning permission in any event.



PLANNING ASSESSMENT

Principle of Development and Family Housing

The principle of subdividing this property has already been accepted. In March 2025, the Council granted permission for two flats accommodating seven people across two households. The site is therefore not one where the Council has consistently required the building to remain a single family house.

The flats permission retained a three-bedroom family unit, and that distinction is acknowledged. It does not decide the current application, but it is relevant to the degree of residential occupation and subdivision already found acceptable.

The HMO would continue to provide residential accommodation within the building. No part of the property would be lost to a commercial or other non-residential use. DMH 1 should therefore be applied with regard to the residential floorspace retained and the policy's supporting text, which includes HMO accommodation.

DMH 5 sets out the circumstances in which HMOs may be acceptable. A general objection to replacing a family house with shared accommodation does not answer those criteria. The Council must consider the quality of the proposed accommodation, its effect on neighbours and character, and the housing needs served by the change.

This approach is supported by the appeal decision at 47 Hanover Circle, APP/R5510/W/25/3372543, dated 15 January 2026. The Inspector found no conflict with DMH 1 and DMH 5 on the family-housing issue, taking account of the retained residential floorspace and the supporting policy text.

That appeal was dismissed for other reasons, so it is not relied upon as approval of an equivalent scheme. Its relevance is the Inspector's treatment of the family-housing objection. The Council's housing evidence and DMH 2 remain relevant here, but the need for family accommodation must be weighed against the housing provided by this proposal.



The proposal would provide accommodation for eight people seeking individual rooms with shared facilities. London Plan Policy H9 recognises the contribution HMOs make to housing provision. Retaining the building in residential use and meeting this different housing need should carry weight in the decision.

We consider that the previous permission for subdivision, the retention of residential accommodation and the improved shared facilities support the proposed use. The loss of a family unit is a consideration, but should not prevent permission where the HMO can provide suitable accommodation and protect neighbouring amenity.

Impact on Neighbouring Amenity

The Council's concern about the activity associated with nine independent occupants has been addressed in two ways. Occupation has been reduced to eight people, and a separate lounge has been provided within the house. Residents will have a comfortable indoor place to spend time together without relying on the kitchen or garden.

The approved flats provide a useful comparison: the Council accepted accommodation for seven people in two households. An eight-person HMO will have different patterns of occupation, but the proposed number of residents is not a substantial increase over the capacity previously assessed. Any difference in noise and activity should be considered in the circumstances of this property.

The Council also found no concentration of registered HMOs along Hayes End Road or Dalton Close in its July assessment. On that evidence, the proposal would not add to an identified cluster of HMOs or displace an established residential character through concentration of the use.

The application is supported by the Noise Impact Assessment prepared by Stone & Brick Solutions, dated 24 August 2026. The report assesses the eight-room proposal following a survey on 22–23 August. It considers noise at the neighbouring houses and garden, as well as sound insulation and conditions inside the HMO.



At No. 103 Hayes End Road, the report predicts sound levels 6 dB below the measured background during the day and 4 dB below it at night. At No. 107, the corresponding figures are 4 dB and 2 dB below background. The consultant concludes that the assessed noise would have a low adverse impact. These findings provide site-specific evidence in response to the concern about disturbance from the proposed occupation.

The assessment also considers use of the rear garden. It predicts 49 dB at the garden of No. 107, which the report places within its stated desirable guideline of 50 dB. This calculation includes a 5 dB reduction from boundary fencing. The fence screening relied upon in the assessment must therefore be retained or provided to the required specification; the proposed bedroom planting is a separate privacy measure.

The report recommends upgrades to the separating floors and party walls, together with acoustic glazing and ventilation. It also calls for testing after installation to confirm that the specified sound insulation has been achieved. These measures can be secured through an appropriate condition and must be completed before the approved use commences.

The noise case therefore rests on more than a management undertaking. It combines the consultant's predictions, sound-insulation works and testing with a reduction in occupation and the provision of a separate communal lounge. On the report's assessed assumptions, this supports the case that the eight-person use can operate without unacceptable noise effects on neighbouring occupiers.

The eight-person limit can also be secured by condition. A named management contact and a clear complaints procedure would provide a direct means of dealing with problems during occupation, alongside the physical sound-insulation measures.

The Council's reference to the appeal at 5 Crossway does not establish that the same harm would arise here. That case involved different character and parking constraints, including an Area of Special Local Character. At Hayes End Road, the Council accepted the garden provision and raised no highways reason for refusal. Those differences, together with the revised internal arrangement, should be reflected in the assessment.

Design

The design changes respond to the Council's concern about the cumulative effect of the side extension, rear additions and dormer. Narrowing the dormer reduces the amount of built form across the rear roof and its prominence above the extensions.

The retained first-floor rear projection is 3.50 metres wide and 3.00 metres deep. The dormer reduction improves the relationship between this projection and the roof addition. The relevant issue is the appearance of the resulting building as a whole.

The earlier flats permission followed removal of the hip-to-gable alteration and first-floor rear extension, together with a smaller dormer. That history explains the Council's concern about upper-floor bulk. The present application retains the first-floor projection but reduces the dormer, and seeks approval for that amended combination.

The certificate for the roof conversion does not, by itself, resolve the design issue. The benefit of the current revision is the reduced dormer width and its effect on the complete rear elevation.

The absence of significant loss of light or overlooking is also relevant. Matching materials and restrained detailing will help the additions relate to the house, although the reduction in roof bulk is the principal design change.

Quality of Accommodation

The eight bedrooms range from 10.37 m² to 18.50 m², with en-suite areas identified separately. Each room will accommodate one person. The bedroom areas are set out below.

Room	Floor	Bedroom area
1	Ground	10.70 m ²

Room	Floor	Bedroom area
2	Ground	11.20 m ²
3	Ground	10.37 m ²
4	First	12.50 m ²
5	First	12.50 m ²
6	First	11.30 m ²
7	First	11.90 m ²
8	Loft	18.50 m ²

The previous refusal criticised the lack of useful communal living space once kitchen fittings and circulation were taken into account. The revised scheme addresses that concern by providing a separate 12.70 m² lounge, furnished with sofas. The kitchen and dining room has also increased from approximately 20.60 m² to 22.10 m².

Residents will be able to sit together in the lounge while others prepare meals or use the dining room. The lounge is accessed from the hall and is not a route through to the kitchen or garden. Its area is therefore available for sitting and relaxation, rather than being taken up by kitchen fittings or access to other facilities.

The kitchen and dining room provides shared cooking facilities, fridge/freezer space and a dining table, with direct access to the rear garden. Combined with the separate lounge, it gives residents a choice of places to eat, relax and spend time together.

These changes go beyond reducing the bedroom count. One letting room has been replaced with shared living space, and the remaining residents benefit from both a dedicated lounge and a larger kitchen and dining room. This is a direct response to the accommodation reason for refusal.

The acoustic report also predicts suitable conditions within the assessed accommodation when its recommended construction, glazing and ventilation are installed. It reports night-time average levels of 22–23 dB in the bedrooms assessed, below the 30 dB guideline used in the report, and maximum



events of 42–43 dB, below its 45 dB comparison level. This supports the quality of the accommodation as well as the response to neighbouring noise concerns.

Rear Bedroom Privacy and Garden Access

The two rear ground-floor bedrooms, Rooms 1 and 2, retain their own doors to the garden. Planting is proposed outside these rooms to create defensible space between the private bedroom frontages and the communal area.

This arrangement will guide other residents away from the windows and doors and soften views into the rooms. The occupants will retain the benefit of direct outdoor access without their bedroom frontage forming part of the main communal circulation space.

The planting will need to provide privacy without enclosing the bedrooms or obstructing daylight and access. Its height, depth and maintenance can be set out in the landscape details, with replacement planting secured where necessary.

The garden was previously considered sufficient for nine occupants. The reduced occupation allows it to serve eight residents, alongside the improved indoor accommodation. The planted bedroom thresholds should be arranged to retain a useful shared garden and clear access routes.

The purpose of the planting is to protect bedroom privacy. It is not presented as sound insulation or a substitute for addressing noise from garden use.

Transport and Highways

The previous Transport Statement and parking survey were considered by the Council, and highways matters did not form a reason for refusal. The reduction from nine to eight occupants gives no reason to expect greater parking or travel demand from the revised scheme.



The side-by-side parking arrangement also avoids the tandem layout criticised in the first refusal. The parking spaces and access should be retained and managed in accordance with the arrangements agreed through the application.

Cycle Storage

Secure cycle storage is required for the eight occupants, with convenient access and sufficient room to use the stands. The final storage details should be coordinated with the parking, paths and garden access.

Refuse Strategy

The refuse arrangements need to reflect the HMO use and the Council's collection requirements. Storage and collection access should remain clear of parking spaces and pedestrian routes. These details can be agreed without altering the main accommodation layout.

Conclusion

The revised scheme provides a better standard of shared accommodation for fewer residents. A bedroom has been replaced by a separate lounge, giving eight occupants 34.80 m² of communal living, kitchen and dining space. This directly addresses the principal criticism of the previous internal layout.

The narrower dormer reduces roof bulk, while the proposed planting protects the privacy of the rear bedrooms and retains direct garden access. These changes build on the aspects of the earlier proposal already accepted by the Council, including garden provision, bedroom accommodation and the absence of a highways reason for refusal.



The family-housing issue should be considered alongside the continued residential use, the earlier approval for subdivision and the housing provided for eight people. The Hanover Circle decision supports that assessment under DMH 1 and DMH 5.

The revised layout and acoustic assessment provide a stronger case for the eight-person HMO. The report predicts low noise impact at the neighbouring houses and identifies the measures needed to protect residential amenity. With those measures, the occupancy limit and the landscaping secured, we consider that the proposal merits permission.