

DELEGATED DECISION

- Please select each of the categories that enables this application to be determined under delegated powers
- Criteria 1 to 5 or criteria 7 to 9 must be addressed for all categories of application, except for applications for Certificates of Lawfulness, etc.

APPROVAL RECOMMENDED: GENERAL		Select an Option
1.	No valid planning application objection in the form of a petition of 20 or more signatures, has been received	<input type="checkbox"/>
2.	Application complies with all relevant planning policies and is acceptable on planning grounds	<input type="checkbox"/>
3.	There is no Committee resolution for the enforcement action	<input type="checkbox"/>
4.	There is no effect on listed buildings or their settings	<input type="checkbox"/>
5.	The site is not in the Green Belt (but see 11 below)	<input type="checkbox"/>
REFUSAL RECOMMENDED: GENERAL		
6.	Application is contrary to relevant planning policies/standards	<input type="checkbox"/>
7.	No petition of 20 or more signatures has been received	<input type="checkbox"/>
8.	Application has not been supported independently by a person/s	<input type="checkbox"/>
9.	The site is not in Green Belt (but see 11 below)	<input type="checkbox"/>
RESIDENTIAL DEVELOPMENT		
10.	Single dwelling or less than 10 dwelling units and/or a site of less than 0.5 ha	<input type="checkbox"/>
11.	Householder application in the Green Belt	<input type="checkbox"/>
COMMERCIAL, INDUSTRIAL AND RETAIL DEVELOPMENT		
12.	Change of use of retail units on site less than 1 ha or with less than 1000 sq. m other than a change involving a loss of A1 uses	<input type="checkbox"/>
13.	Refusal of change of use from retail class A1 to any other use	<input type="checkbox"/>
14.	Change of use of industrial units on site less than 1 ha or with less than 1000sq.m. of floor space other than to a retail use.	<input type="checkbox"/>
CERTIFICATE OF LAWFULNESS		
15.	Certificate of Lawfulness (for proposed use or Development)	<input type="checkbox"/>
16.	Certificate of Lawfulness (for existing use or Development)	<input type="checkbox"/>
17.	Certificate of Appropriate Alternative Development	<input type="checkbox"/>
CERTIFICATE OF LAWFULNESS		
18.	ADVERTISMENT CONSENT (excluding Hoardings)	<input type="checkbox"/>
19.	PRIOR APPROVAL APPLICATION	<input type="checkbox"/>
20.	OUT-OF-BOROUGH OBSERVATIONS	<input type="checkbox"/>
21.	CIRCULAR 18/84 APPLICATION	<input type="checkbox"/>
22.	CORPSEWOOD COVENANT APPLICATION	<input type="checkbox"/>
23.	APPROVAL OF DETAILS	<input type="checkbox"/>
24.	ANCILLARY PLANNING AGREEMENT (S.106 or S.278) where the Heads of Terms have already received Committee approval	<input type="checkbox"/>
25.	WORKS TO TREES	<input type="checkbox"/>
26.	OTHER (please specify)	<input type="checkbox"/>

The delegation powers schedule has been changed. Interim Director of Planning, Regeneration & Public Realm can determine this application

Case Officer:

Signature:

Date:

A delegated decision is appropriate and the recommendation, conditions/reasons for refusal and informative's are satisfactory.

Team Manager:

Signature:

Date:

The decision notice for this application can be issued.

Director / Member of Senior Management Team:

Signature:

Date:

NONE OF THE ABOVE DETAILS
SHOULD BE USED IN THE PS2
RETURNS ODPM

Item No.	Report of the Head of Development Management and Building Control	
Address:	177 STATION ROAD WEST DRAYTON	
Development:	Conversion of 8-bed HMO to 9-bed HMO	
LBH Ref Nos:	47713/APP/2024/3109	
Drawing Nos:	Location Plan 177SR_D01-D05(Approved) 177SR_S01-S06 Rev B 177SR_S11-S16 (Pre Existing) 177SR_D11-D15 (LPA)	
Date Plans received:	26-11-24	Date(s) of Amendments(s):
Date Application valid	26-11-24	

1. SUMMARY

Permission is sought to provide an additional bedroom, increasing the size of the property from a 8 bed to 9 bed HMO. This would be achieved through converting the room to the front of the property to enable this space to be used as a bedroom with en-suite bathroom.

No external changes are proposed to the property, whilst the introduction of an additional bedroom to the front of the dwelling would introduce some incoherence in terms of the appearance of the front of the dwelling, the proposals retain, albeit somewhat superficially the appearance of a front entrance. In this regard the proposals would not be dissimilar to the design consented under planning application 47713/APP/2022/2694 where this matter was considered at appear albeit in the absence of the recently consented front porch. Officers consider that in design terms, the proposals would not amount to harm to the character and appearance of the area and the significance of the conservation area.

It is considered that the addition of a further habitable bedroom would not result in harm with regard to the amenity of the nearest neighbouring dwellings, whilst the highways impact of the development can be appropriately managed subject to the imposition of appropriate conditions to secure a car and cycle parking plan and details of a crossover design to access the parking.

The addition of a further bedroom would increase the number of occupiers present in the property, whilst also reducing the quantity of communal living space provided, which has been cumulatively reduced under planning permission 47713/APP/2024/1041. The proposals would result in an over-concentration in the number of occupiers relative to the quantity and quality of amenity space provided within the property. The proposals are therefore contrary to Policy DMH5 and DMHB 16 of the Local Plan Part 2 - Development Management Policies; Policy D6 of the London Plan 2021; and the NPPF 2024, in particularly Paragraph 135.

2. RECOMMENDATION

REFUSAL for the following reasons:

1. NON2 Non Standard reason for refusal

The development would result in an increased number of occupiers, whilst reducing the quantity of internal communal amenity space, this would equate to an over-concentration of occupants on site accounting for the size of the dwelling and the proposals would therefore fail to provide adequate living accommodation, resulting in an over-concentration of occupants on site accounting for the size of the dwelling. The proposals would be contrary to Policy DMH5 and DMHB 16 of the Local Plan Part 2 - Development Management Policies; Policy D6 of the London Plan 2021; and the NPPF 2024, in particular Paragraph 135.

INFORMATIVES

1. I52 Compulsory Informative (1)

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to 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 - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

LPP D4 (2021) Delivering good design

DMHB 1 Heritage Assets

LPP HC1 (2021) Heritage conservation and growth

NPPF12 -24 NPPF12 2024 - Achieving well-designed places

NPPF16 -24 NPPF16 2024 - Conserving and enhancing the historic environment

NPPF9 -24 NPPF9 2024 - Promoting sustainable transport

DMH 1 Safeguarding Existing Housing

DMH 4 Residential Conversions and Redevelopment

DMEI 7	Biodiversity Protection and Enhancement
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 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP GG2	(2021) Making the best use of land
LPP GG4	(2021) Delivering the homes Londoners needs
LPP H1	(2021) Increasing housing supply
LPP H2	(2021) Small sites
LPP H10	(2021) Housing size mix
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP T5	(2021) Cycling
LPP T6.1	(2021) Residential parking

3. CONSIDERATIONS

3.1 Site and Locality

177 Station Road is a two storey property which forms part of a semi-detached pair of dwellings located in the West Drayton Conservation Area. The roof space within the property has been converted to form an additional bedroom. The property has been converted into an HMO. The internal layout consists of 8 bedrooms and internal shared communal living space consisting of a kitchen at ground floor level.. There is a room to the front of the property which adjoins a set of doors that formerly functioned as the primary entrance to the dwelling that is stated within the most recent planning permission (47713/APP/2024/1041) to be in use as a communal study area. This space was shown on previously approved drawings relating to an application for the erection of a front porch as being a lobby area.

The property benefits from a rear garden. There is a garden room outbuilding located at the far end

of the garden. There is an area to the front of the dwelling which is used as car parking, however as noted in the report, this does not benefit from a vehicle crossover to access these spaces.

3.2 Proposed Scheme

Permission is sought to provide an additional bedroom, increasing the size of the property from a 8 bed to 9 bed HMO. This would be achieved through converting the room to the front of the property to enable this space to be used as a bedroom with en-suite bathroom.

3.3 Relevant Planning History

47713/APP/2024/2233 177 STATION ROAD WEST DRAYTON

Erection of a front porch

Decision: 07-11-2024 Approval

47713/APP/2024/1041 177 STATION ROAD WEST DRAYTON

Conversion of existing 7no. bed 7person Sui Generis HMO to an 8no. bed 8person Sui Generis HMO (Retrospective application)

Decision: 19-07-2024 Approval

47713/APP/2022/2693 177 STATION ROAD WEST DRAYTON

Conversion of existing Class C3 dwelling to 8 beds 8 people Sui Generis HMO with front door replacement, single storey rear extension, demolition of side bay window, conversion of loft into habitable space and erection of single storey detached outbuilding.

Decision: 21-10-2022 Refusal **Appeal:** 09-10-23 Dismissed

47713/APP/2022/2694 177 STATION ROAD WEST DRAYTON

Conversion of existing Class C3 dwelling to 9 beds 9 people Sui Generis HMO with front door replacement, single storey rear extension, demolition of side bay window, conversion of loft into habitable space and erection of single storey detached outbuilding.

Decision: 21-10-2022 Refusal **Appeal:** 09-10-23 Dismissed

47713/APP/2022/181 177 STATION ROAD WEST DRAYTON

Erection of a single storey rear extension and conversion of loft into habitable space with 2 front roof lights and rear dormer.

Decision: 18-05-2022 Approval

47713/APP/2022/195 177 STATION ROAD WEST DRAYTON

Conversion of existing Class C3 Dwelling to 3 x self-contained flats with single storey rear extension, demolition of side bay window, and erection of single storey detached outbuilding as summer house

Decision: 08-04-2022 Refusal

47713/APP/2022/196 177 STATION ROAD WEST DRAYTON

Conversion of existing Class C3 dwelling to 7 beds, 7 people Sui Generis HMO with erection of single storey rear extension with 2 roof lights, demolition of side bay window, conversion of loft into habitable space with rear dormer and 2 front roof lights, erection of single storey detached outbuilding and amendments to fenestration.

Decision: 09-08-2022 Approval

47713/APP/2022/66 177 STATION ROAD WEST DRAYTON

Erection of a single storey rear outbuilding for use as a home office (Application for a Certificate of Lawful Development for a Proposed Development)

Decision: 05-03-2022 Approval

Comment on Planning History

Planning permission was granted in July 2024 (47713/APP/2024/1041) to use the property as an 8 bedroom HMO. This involved the conversion of living space to the rear of the dwelling to provide an additional bedroom. Formerly planning permission was refused for two separate applications in 2022 to convert the front room of the property into an 8 bedroom (47713/APP/2022/2693) and 9 bedroom (47713/APP/2022/2694) HMO. Both applications were subject of a joint appeal with both appeals dismissed on the grounds that the bedroom was an inadequate size and provided inadequate living accommodation for future occupants.

Planning permission was granted in 2024 (47713/APP/2024/2233) for the erection of a front porch which adjoins the front room.

The above applications are relevant to the planning proposals and are considered in the report below.

4. Advertisement and Site Notice

4.1 Advertisement Expiry Date: **11th January 2025**

4.2 Site Notice Expiry Date: Not applicable

5. Comments on Public Consult

PUBLIC COMMENTS

One letter of objection has been received from the West Drayton Conservation Area Advisory Panel for the following reasons:

I am writing on behalf of West Drayton Conservation Area Advisory Panel. We are strongly opposed to this proposal and therefore expect it to be refused. Only in October we commented on the previous application (47713/APP/2024/2233) which unfortunately was approved. Our objection to that was two-fold: First, it neither retained the original appearance of the front elevation of this house, nor mirrored the appearance of the adjacent semi-detached house and therefore, in our opinion, made a negative contribution to the street scene. The second strand of our objection was that if permitted, the extension would increase the floor area of the 'lobby' to the point where we foresaw the owners could wish to reinstate the additional bedroom that they had planned for this

space (47713/APP/2022/2694) although it was refused. This is exactly what they are now proposing so we expect the application to be refused to ensure consistency with the 2022 decision. Further reasons for refusal could be that the size of the room is too small, and the internal re-arrangements within the house over the last few years mean that there is now far less communal cooking and eating space, so that addition of an extra resident would mean even more overcrowding for the other residents.

INTERNAL CONSULTEES

Highways

The proposal is for the conversion of an 8-bed HMO to an 9-bed HMO.

The applicant has not submitted any information to substantiate how the proposal is in accordance with The Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 6: requires that development proposals must comply with the relevant parking standards.

The HA has reviewed the application and to mitigate as much as possible the proposals potential impact on the public highway and in accordance with LBH SPD and London Plan the HA has the following comments to make:

The applicant is advised to provide on-site car parking for 2no. car parking spaces and plans showing detailed dimensions of the car parking layout and how it is in accordance with LBH local plan 2 car parking layout guidance. These 2no. laid out parking spaces should be in a position that maximises pedestrian sight lines. The Highway Authority notes that the current development utilises a hardstanding at the front of the property to provide parking for 2no. cars. However, these spaces are inaccessible as a formal vehicle crossover has not been provided. To address this the Highway Authority requires the applicant to apply to the Council to have a vehicle crossover provided, this is to be installed before work on the proposed development commences.

Also, pedestrian path/access to dwellings and the area in front of dwellings/door entrance, at least 1m in width and depth respectively must be kept clear/physically protected from any potential obstruction caused by parked vehicle, inconsiderate parking by drivers, this is in order to maintain clear access to/from the building for all pedestrians, people with disabilities in case of emergencies.

No cycle storage has been shown for the additional unit, cycle parking provision and storage for the HMO should be compliant with policy DMT6 (1 per occupant). It would appear the only place the cycle store can be provided is in the front forecourt which the applicant will need to take into account when preparing the car parking layout for the front forecourt which should include a protected pedestrian path as mentioned above.

The onus is on the applicant to provide sufficiently detailed information for the HA to fully understand and assess the viability of the proposal, it is not for the HA to make assumptions or undertake any of the assessment on behalf of the applicant.

Until the above information is provided the HA is not in a position to determine the suitability or otherwise of the development to make an informed decision on the proposal's suitability, impact and safety.

Access Officer

This proposal, which seeks to increase this existing HMO from 8 beds to 9, does not raise an accessibility concern.

6. Local Plan Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.HE1	(2012) Heritage
PT1.H1	(2012) Housing Growth

Part 2 Policies:

LPP D4	(2021) Delivering good design
DMHB 1	Heritage Assets
LPP HC1	(2021) Heritage conservation and growth
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF16 -24	NPPF16 2024 - Conserving and enhancing the historic environment
NPPF9 -24	NPPF9 2024 - Promoting sustainable transport
DMH 1	Safeguarding Existing Housing
DMH 4	Residential Conversions and Redevelopment
DMEI 7	Biodiversity Protection and Enhancement
DMH 5	Houses in Multiple Occupation
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
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LPP H2	(2021) Small sites
LPP H10	(2021) Housing size mix
LPP D6	(2021) Housing quality and standards

LPP D7	(2021) Accessible housing
LPP T5	(2021) Cycling
LPP T6.1	(2021) Residential parking

In addition: **Development Plan**
 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

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

Material Considerations

The National Planning Policy Framework (NPPF) (2021) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

7. MAIN PLANNING ISSUES

7.1 Impact on the amenities of the occupiers of neighbouring residential properties

Paragraph 135 of the NPPF (2023) states 'Planning policies and decisions should ensure that developments:

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

Policies DMHD 1 and DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) seek to ensure a satisfactory relationship with adjacent dwellings with no unacceptable loss of outlook, amenity, daylight and sunlight to neighbouring occupiers.

The development would not conflict with Policies DMHD 1 and DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

Paragraph 135 of the NPPF (2023) states 'Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 c) are sympathetic to local character and history, including the surrounding built environment and

landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

Policies D1, D3 and D4 of the London Plan (2021) require development proposals to be of high quality and to enhance the local context by delivering buildings and spaces that positively respond to local distinctiveness.

Hillingdon Local Plan Part 1: Strategic Policies (2012) Policy BE1 states 'The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place.'

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states: 'All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including: i) harmonising with the local context by taking into account the surrounding scale of development, height, mass and bulk of adjacent structures; building plot sizes and widths, plot coverage and established street patterns; building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure; architectural composition and quality of detailing; local topography, views both from and to the site; and impact on neighbouring open spaces and their environment.'

Policy DMHB 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) re-emphasises the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

Overall the design of the development would comply with Policy BE1 of the Hillingdon Local Plan Part 1: Strategic Policies (2012); Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020); and Policies D1, D3 and D4 of the London Plan (2021).

No physical alterations are proposed to the dwelling that would otherwise impact on the amenity of adjoining properties.

The provision of an additional room would increase activity given that there would be an additional occupier that would be resident in the property. The impact of a 9 bedroom HMO on neighbouring amenity was considered under the appeal relating to planning application 47713/APP/2022/2694. The inspector addressed this matter directly within the appeal decision noting that an increase in the number of rooms to either 8 or 9 would increase the potential number of comings and goings at the site, including from visitors and deliveries, and there may be an associated increase in activity at times in the rear hard surfaced communal amenity space. However, this increase in activity would be relatively small in the context of the permitted use and character of the surrounding area.

The rear yard is well screened by tall solid fencing on all sides, and such a relatively small increase in occupation of the property would be unlikely to lead to significant additional noise and disturbance to neighbours at No 179 or at the adjacent flats at Nos 173 - 175.

Officers concur with the inspectors view that the the proposed development would not result in harm to the living conditions of neighbouring occupiers at 173, 173A, 175, 175A and 179 Station Road with particular regard to noise and disturbance.

7.2 Impact on Street Scene

IMPACT ON THE CONSERVATION AREA, EXISTING BUILDING AND WIDER STREETSCENE

Policy DMHB 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states: The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where: i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation; ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF; iii) it makes a positive contribution to the local character and distinctiveness of the area; iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset; v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials; vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily. B) Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset. The Council may require an alternative solution which will protect the asset yet meet the sustainability objectives of the Local Plan. C) The Council will seek to secure the repair and reuse of Listed Buildings and monuments and improvements to Conservation Areas on the Heritage at Risk Register, through negotiations with owners, the provision of advice and guidance, the use of appropriate legal action, and through bids for external funding for improvement works.

The application site is located in the West Drayton Conservation Area. Policy DMHB 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states: New development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness. In order to achieve this, the Council will: A) Require proposals for new development, including any signage or advertisement, to be of a high quality contextual design. Proposals should exploit opportunities to restore any lost features and/or introduce new ones that would enhance the character and appearance of the Conservation Area. B) Resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification. C) Proposals will be required to support the implementation of improvement actions set out in relevant Conservation Area Appraisals and Management Plans. The London Plan (2021) similarly seeks to preserve and enhance heritage assets.

In line with Paragraph 212 of the NPPF (2024) consideration must be given to the impact of a proposed development on the significance of this designated heritage asset and great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 outlines that in the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Paragraph 135 of the NPPF (2023) states 'Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

Policies D1, D3 and D4 of the London Plan (2021) require development proposals to be of high quality and to enhance the local context by delivering buildings and spaces that positively respond to local distinctiveness.

Hillingdon Local Plan Part 1: Strategic Policies (2012) Policy BE1 states 'The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place.'

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states: 'All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including: i) harmonising with the local context by taking into account the surrounding scale of development, height, mass and bulk of adjacent structures; building plot sizes and widths, plot coverage and established street patterns; building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure; architectural composition and quality of detailing; local topography, views both from and to the site; and impact on neighbouring open spaces and their environment.'

Policy DMHB 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) re-emphasises the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

The proposals do not include external alterations to the dwelling, albeit that any regular use of the front access door is likely to cease. There is some lack of clarity in relation to the existing use of the

front room, where comparing the plans consented under planning applications 47713/APP/2024/1041 and 47713/APP/2024/2233 as the rooms are described as a study and lobby respectively. The side door is however clearly in use as the main entrance to the dwelling consistent with all previously approved plans relating to the property.

The conversion of the front room incorporating the consented porch results in some incoherence in terms of how this relates to the frontage of the property, however similar to the plans that were considered under planning application 47713/APP/2022/2694 the proposals retain a front door. The applicants have stated that the front door would continue to be used as a fire exit and externally would still read as a front entrance, albeit somewhat superficially.

When commenting on the appeal relevant to planning application 47713/APP/2022/2694 that was dismissed on the site in 2023, the appeal inspector commented that

"the significance of the area derives largely from its suburban growth around the historically important open spaces at The Closes, Drayton Hall and Park and the medieval St Martin's Parish Church, along with the legacy of those spaces in providing an open and verdant setting to the streets and buildings in this primarily residential part of West Drayton. Although the appeal property contributes positively to the residential character of the area, and it exhibits some visual interest in its vertical tile hung projecting front bay window and its crested roof ridge tiles, overall, I judge its contribution to the significance of the Conservation Area as neutral".

In commenting on the alterations to the front door of the property, the inspector noted that the changes proposed to the front elevation would not be markedly different to the appearance of the dwelling shown on the plans as existing. Moreover, the proposed alterations to the front door would not be dissimilar to the appearance of the front door of No 179. While the main entrance into the building would be provided in the flank wall facing the four flats at 173 - 175 Station Road, this would not alter the impression of there being a visible main entrance to the front of the house. Accordingly, the proposed alterations to the front elevation would not seem noticeably unusual and would not result in the pair of semis appearing unbalanced.

Given that the proposals would not be dissimilar to the 2023 appeal, where the inspector considered that the addition of a bedroom to the front room adjoining the former entrance, it is considered that the proposals would similarly not result in harm to the character and appearance of the street scene and would preserve the setting of the West Drayton Conservation Area and would consequently not result in any harm to the significance of this designated heritage asset.

7.3 Traffic Impact/Pedestrian Safety

See section below.

7.4 Carparking & Layout

PARKING

Policy DMT 2 of the Hillingdon Local Plan Part 2: Development Management Policies (2020) states: 'Development proposals must ensure that:

- i) safe and efficient vehicular access to the highway network is provided to the Council's standards;
- ii) they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents;
- iii) safe, secure and convenient access and facilities for cyclists and pedestrians are satisfactorily accommodated in the design of highway and traffic management schemes;
- iv) impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and
- v) there are suitable mitigation measures to address any traffic impacts in terms of capacity and

functions of existing and committed roads, including along roads or through junctions which are at capacity.'

Policy DMT 5 of the Hillingdon Local Plan Part 2: Development Management Policies (2020) states: A) Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network, including:

- i) the retention and, where appropriate, enhancement of any existing pedestrian and cycle routes;
- ii) the provision of a high quality and safe public realm or interface with the public realm, which facilitates convenient and direct access to the site for pedestrian and cyclists;
- iii) the provision of well signposted, attractive pedestrian and cycle routes separated from vehicular traffic where possible; and
- iv) the provision of cycle parking and changing facilities in accordance with Appendix C, Table 1 or, in agreement with Council.'

Policy DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity. For an HMO with up to 6 occupants, this would be 1 space per 2 occupants. There are no specific parking requirements for HMO's set out in the London Plan (2021).

The application site has a PTAL of 3 and is in a relatively sustainable location in terms of public transport access. The site is within 800 metres of West Drayton Station and is within close walking distance of a number of bus stops. The property utilises two car parking spaces to the front of the property, however these spaces are not appropriately accessible at the present time and the access does not benefit from a crossover. The submitted plans do not include layouts for the parking. Whilst there is presently space for two cars to park this should be set out within plans indicating marked parking bays, taking into account the need to maintain clear access to/from the building for all pedestrians, people with disabilities in case of emergencies. The Highway Authority within their consultation response notes that the applicant would be required to apply to the Council to have a vehicle crossover provided, this is to be installed before work on the proposed development commences. The provision of a parking plan and details of a vehicular crossover could be secured by planning condition were the application to be recommended for approval.

CYCLE PARKING

Table 10.2 of the London Plan relating to Policy T5 sets out cycle parking standards for all residential properties. Based on the size of the HMO there would be a requirement to provide a minimum of two cycle parking spaces. The submitted plans do not show the provision of cycle parking within the site, however there is sufficient room at either the front or rear of the property to provide dedicated cycle parking and therefore details could be secured by planning condition were the application to be recommended for approval.

7.5 Urban Design, Access and Security Considerations

INTERNAL AMENITY

Policy D6 of the London Plan outlines standards applicable to all new housing. This includes minimum internal space standards. The policy states that housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose.

Policy DMH 5 of the Local Plan states that proposals for the provision of large HMOs, residential hostels, student accommodation and secure accommodation will be required to demonstrate that

they provide satisfactory living conditions for the intended occupiers.

Policy DMHB 16 of the Local Plan requires more generally that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. This includes residential conversions.

In terms of the internal living space, this comprises a kitchen/dining/living space measuring 18sqm in total area. Planning permission was granted in July 2024 (47713/APP/2024/1041) to use the property as an 8 bedroom HMO. This involved the conversion of living space to the rear of the dwelling to provide an additional bedroom, which resulted in a significant reduction in the amount of communal living space in the property.

Formerly planning permission was refused for two separate applications in 2022 to convert the front room of the property into an 8 bedroom (47713/APP/2022/2693) and 9 bedroom (47713/APP/2022/2694) HMO. Both applications were subject of a joint appeal with both appeals dismissed on the grounds that the bedroom was an inadequate size and provided inadequate living accommodation for future occupants. In both instances the proposed bedroom measured 7.7sqm in area. Whilst this was compliant with Nationally Described Space Standards for a single bedroom, the inspector noted that a higher amount of private living space should be provided given that the bedroom is the only private space that occupiers would have access to, as living and cooking facilities were communal. The inspector agreed that permission should be refused on the inadequacy of the living space associated with the front bedroom.

The proposals are put forward on the basis that were the recent planning application for a porch (47713/APP/2024/2233) to be implemented that this would increase the size of the front room to 10.5sqm. It is noted that planning permission has yet to be implemented. The works would provide a slightly larger bedroom, although this would still be relatively small and would only be classed as a single bedroom where applying the relevant space standards set out in the London Plan.

Since the previous planning application was refused the communal space has been reduced further through the provision of a bedroom to the rear of the property. It was proposed under the recent permission 47713/APP/2024/1041 that the area to front of the house would be used as communal space (as a study). The proposals would result in the loss of this communal space whilst increasing the number of occupiers present in the property.

It is described within the planning application that the outbuilding (described as a games room) would supplement the kitchen/living space for use as amenity space for the occupiers. This use was listed in previous applications, however when visiting the site the building was locked and appeared to be in use as storage space and in any event is not conveniently located being sited at the end of the garden and is therefore less desirable compared with providing amenity space within the property itself.

In summary the proposals increase the number of occupiers present in the property, whilst reducing the quantity of internal communal amenity space would fail to provide adequate living accommodation, resulting in an over-concentration of occupants on site accounting for the size of the dwelling. The proposals would be contrary to Policy DMH5 and DMHB 16 of the Local Plan Part 2 - Development Management Policies; Policy D6 of the London Plan 2021; and the NPPF 2024, in particularly Paragraph 135.

EXTERNAL AMENITY

The property benefits from a relatively large rear garden, which is considered adequate to serve a 9 bed HMO.

7.6 Other Issues

BIODIVERSITY NET GAIN:

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat.

There are exemptions and the BNG planning condition does not apply to planning permission for development that is below a de minimis threshold, i.e.:

- does not impact an onsite priority habitat; and
- the development impacts less than 25sqm of onsite habitat that has biodiversity value greater than zero; and
- the development impacts less than 5m in length of onsite linear habitat

One exemption is Development below a de minimis threshold. This exemption applies to development that does not impact a priority habitat and impacts less than 25 square metres (e.g. 5m x 5m) of non-priority onsite habitat (such as modified grassland) or 5m for non-priority onsite linear habitats (such as native hedgerows).

The development would comprise internal alterations to the existing building. Therefore the development would not exceed the de minimis threshold and is considered to be BNG exempt.

In this instance, having regard to the above criteria, the proposed change of use from a 8no bed HMO to a 9no bed HMO is considered to fall below the de minimis threshold. Therefore the proposal is considered to be BNG exempt and a biodiversity gain plan is not required.

8. Reference Documents

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)

Hillingdon Local Plan: Part 2 - Development Management Policies (2020)

London Plan (2021)

National Planning Policy Framework (2023)

Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021)

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