

DESIGN AND ACCESS STATEMENT

26 STIRLING ROAD, HAYES, UB3 3AH

PROPOSAL: CHANGE OF USE OF THE EXISTING CLASS C3 DWELLINGHOUSE TO A 6B6P C4 HMO, INCLUDING THE CONVERSION OF THE EXISTING GARAGE INTO HABITABLE ACCOMMODATION AND THE ERECTION OF A PART SINGLE, PART TWO-STOREY REAR EXTENSION FOLLOWING THE DEMOLITION OF THE EXISTING CONSERVATORY.

APPLICANT: MR K SEHDEV



Date: Jan 2026 (Rev.1.0)

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1 INTRODUCTION

This Design and Access Statement has been prepared by **OPS Chartered Surveyors** on behalf of the applicant in support of a full planning application for the following proposal:

Change of use of the existing Class C3 dwellinghouse to a 6B6P C4 HMO, including the conversion of the existing garage into habitable accommodation and the erection of a part single, part two-storey rear extension following the demolition of the existing conservatory.

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

- i) Application drawings
- ii) HMO Management and Supervision Plan
- iii) Site Supervision and Management Plan
- iv) London Borough of Hillingdon HMO Register
- v) Decision Notice, Officer Report – 177 Station Road, UB7 7NQ
- vi) Decision Notice, Officer Report and Approved Drawings – 19 Peachey Lane, UB8 3RX
- vii) Appeal Decision Notice and Drawings – 49 Central Avenue, UB3 2BW

2 THE SITE

The application site comprises a **two-storey semi-detached residential property** located on the southern side of **Stirling Road**, backing onto residential land off **Hamilton Road**.

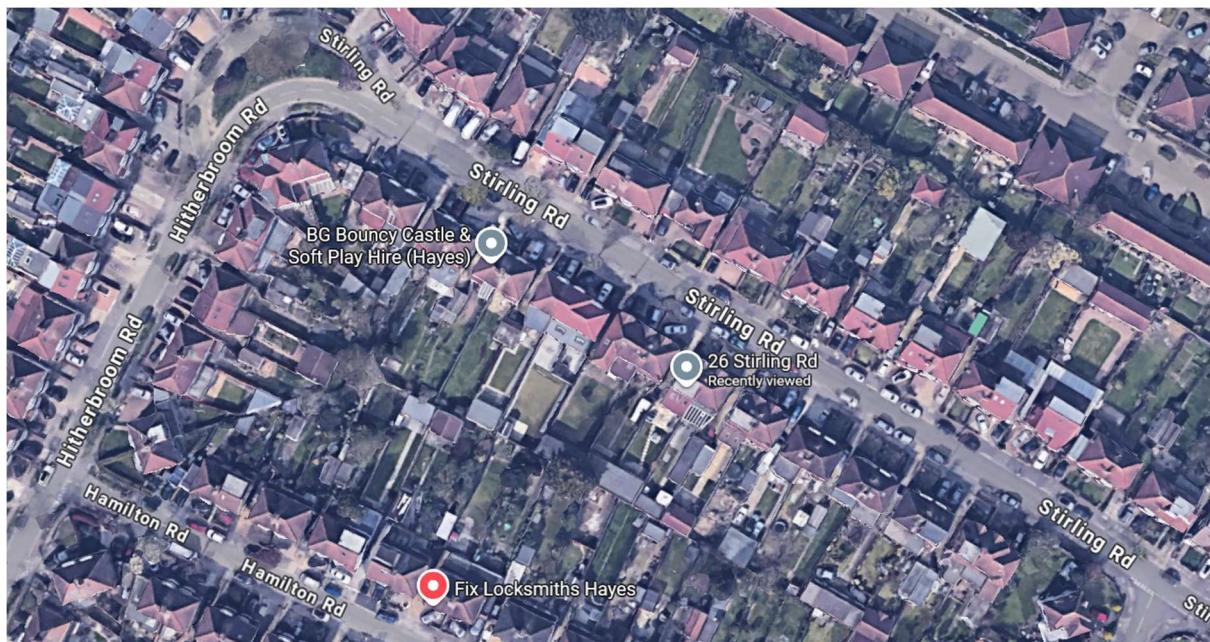


Figure 1. Showing the proposed site

The site lies within the **Developed Area** as identified by the **Hillingdon Local Plan: Part Two – Development Management Policies (2020)**. 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 detached and 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 existing parking provision. The site is not within a **Controlled Parking Zone (CPZ)**. The location benefits from reasonable access to public transport and local facilities, with a **Public Transport Accessibility Level (PTAL) of 2/3**. Regular bus services operate along Coldbarbour Lane and Uxbridge Road, providing connections to Hayes and Uxbridge town centres, as well as Underground and rail stations (Hayes & Harlington) within a reasonable walking distance.

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 lower-cost 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 application property is currently in lawful use as a Class C3 dwellinghouse.

The site has the benefit of the following extant planning permissions, both of which remain capable of implementation:

Ref: 53291/APP/2024/1916

26 Stirling Road, Hayes

Construction of a part single-storey, part two-storey rear extension following the demolition of the existing conservatory.

Decision date: 16 July 2024

Decision: Approved

Ref: 53291/APP/2024/1917

26 Stirling Road, Hayes

Erection of a part single-storey, part two-storey rear extension following the demolition of the existing conservatory, together with the conversion of the existing garage to habitable use.

Decision date: 16 July 2024

Decision: Approved

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 extant permission ref. **53291/APP/2024/1917**, with the approved extensions and garage conversion forming part of the baseline built form. In addition, internal alterations only are proposed to facilitate the use of the property as a small Class C4 HMO.

No further external alterations are proposed beyond those already approved under the extant permissions.

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 and dining area** measuring approximately **20.0 m²**, providing sufficient cooking, food preparation, and dining facilities for the intended level of occupancy
- One shared **living-room** measuring approximately **10.5 m²**
- **Six en-suite bedrooms**, each designed and restricted to **single occupancy only**
- **Secure cycle storage** provision for up to **six bicycles**
- **Two 240-litre refuse bins**, to serve the proposed use
- Approximately **160 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**, and **formal management arrangements**, as set out within the submitted **HMO Management and Supervision Plan**.

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 under extant planning permissions**, 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.

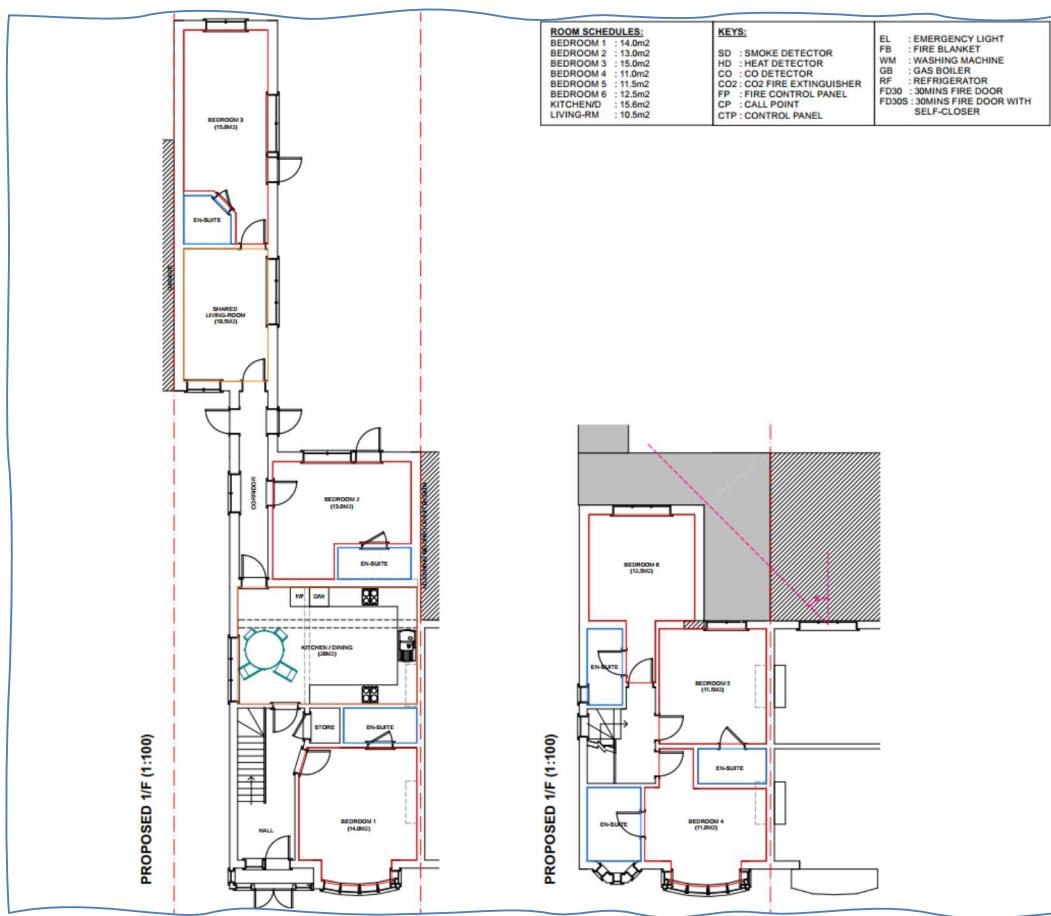


Fig. 2: The proposed C4 HMO floor plan

4.1 CASE PRECEDENTS:

The proposed internal layout, provision of bedrooms, and level of shared communal accommodation are comparable to, and in some respects more modest than, HMO schemes previously approved by the London Borough of Hillingdon. Two particularly relevant decisions are summarised below.

i) 177 Station Road, UB7 7NQ - Application Ref: 47713/APP/2024/1041

In the Officer's Report, the Council assessed a small HMO proposal where the communal facilities within the main building had been reduced to a kitchen/dining area of 18.5 m², compared with a previously approved scheme providing 37 m² of communal space. The Officer noted:

"Whilst the proposal results in the reduction of communal facilities within the building, officers have however received confirmation from the Council's Private Sector Housing Officer that the level of communal facilities within the building are satisfactory from a HMO licensing perspective. It is therefore considered that a refusal based on the reduction of communal facilities within the main building would not be sustainable."

The assessment concluded that, **notwithstanding the reduced internal communal space, the layout, size, and orientation** of the communal kitchen and dining area were acceptable for a larger 8-bedroom, 8-person HMO.

By comparison, the current proposal seeks consent for a smaller 6-bedroom, 6-person HMO, with a communal kitchen and dining area of a broadly comparable scale. On this basis, and having regard to the Council's established position in the Station Road decision, the level of communal accommodation proposed in this application should be regarded as acceptable in principle.

ii) 19 Peachey Lane, UB8 3RX - Application Ref: 75488/APP/2020/4271

In this case, planning permission was granted for a 7-bedroom HMO, comprising en-suite bedrooms, a communal kitchen/dining room at ground floor level, and additional communal living space within the loft. The proposal also benefited from a substantial rear garden measuring approximately 185 m².

The Officer's Report concluded:

"It is considered that the future occupants of the HMO would enjoy a satisfactory level of amenity in accordance with the requirements of Policies DMH5, DMHB11 and DMHB18 of the Hillingdon Local Plan – Part Two (2020)."

Although the Peachey Lane scheme accommodated a higher number of occupiers, the communal kitchen and dining arrangements were assessed by the Council as providing an acceptable standard of residential amenity. The current proposal, which involves fewer bedrooms and occupiers, adopts a similar approach to communal facilities and therefore aligns with the principles established by this approval.

Having regard to the above precedents, the proposed 6-bedroom, 6-person Class C4 HMO is proportionate in scale, provides an appropriate level of communal accommodation, and reflects standards previously accepted by the Council for comparable and more intensive schemes.

Given the controlled occupancy, the absence of any external alterations, and the retention of adequate internal and external amenity space, it is considered that the proposal would not result in harm to residential amenity or the character and appearance of the area. The development is therefore consistent with the relevant policies of the Hillingdon Local Plan, the London Plan, and the objectives underpinning the borough-wide Article 4 Direction.

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 **combined kitchen and dining area of approximately 20m²**, together with a **separate shared living room measuring approximately 10.5 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 **160 m²** of shared rear garden space, which is considered generous and appropriate for the scale of the development.

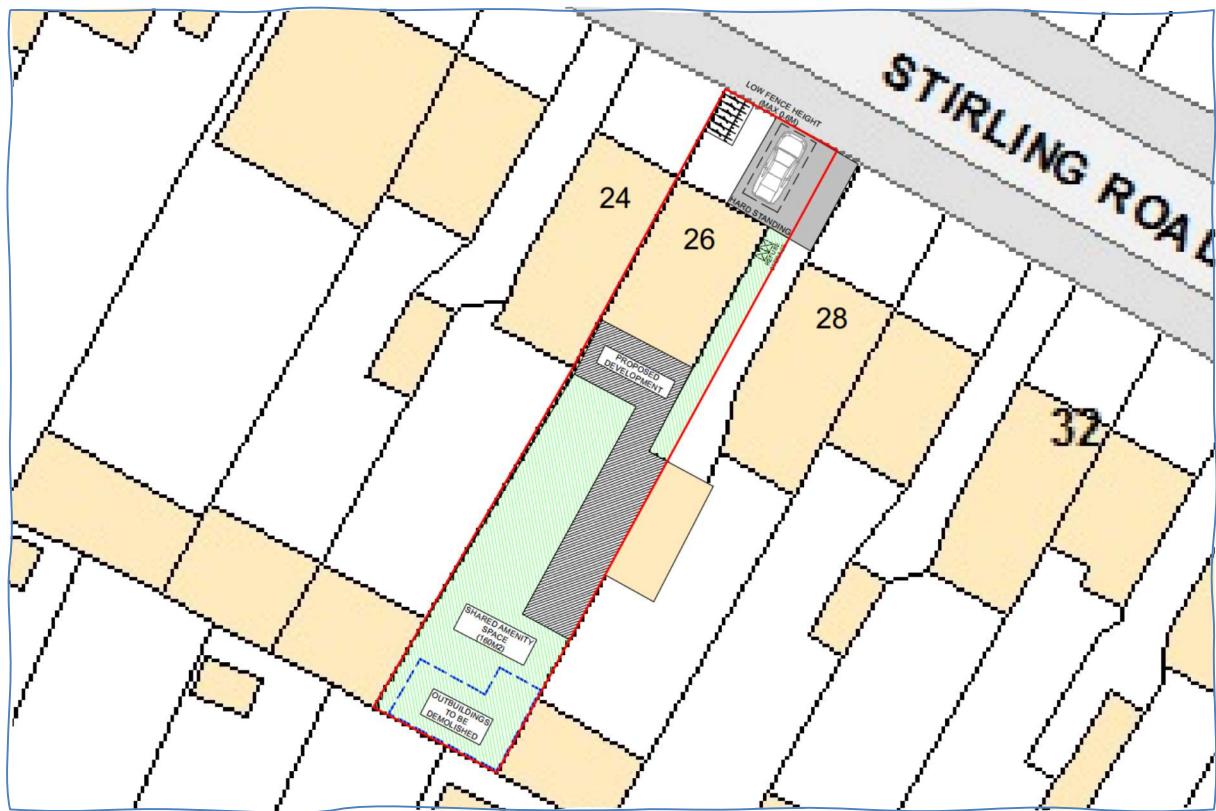


Fig. 3: Outdoor Amenity for the proposed development

5.3 HMO CONCENTRATION ANALYSIS

DMH 5(B)(i) – Neighbourhood Area (100m radius)

Road Name	No. of Houses	No. of HMOs
Hamilton Road	36	0
Newman Road	4	0
St Christopher Drive	12	0
Stirling Road	45	1
Total	97	1

Existing HMO concentration: **1.03%**

Post-proposal concentration: **2.06%**

DMH 5(B)(iii) – Street Length (100m either side)

Road Name	No. of Houses	No. of HMOs
Stirling Road	45	1
Proposed site	-	2

Existing HMO concentration: **2.2%**

Post-proposal concentration: **4.4%**

All figures are derived from the **Council's HMO Register (December 2025)** and satellite mapping. Any minor variance would not materially affect compliance.

Research Map

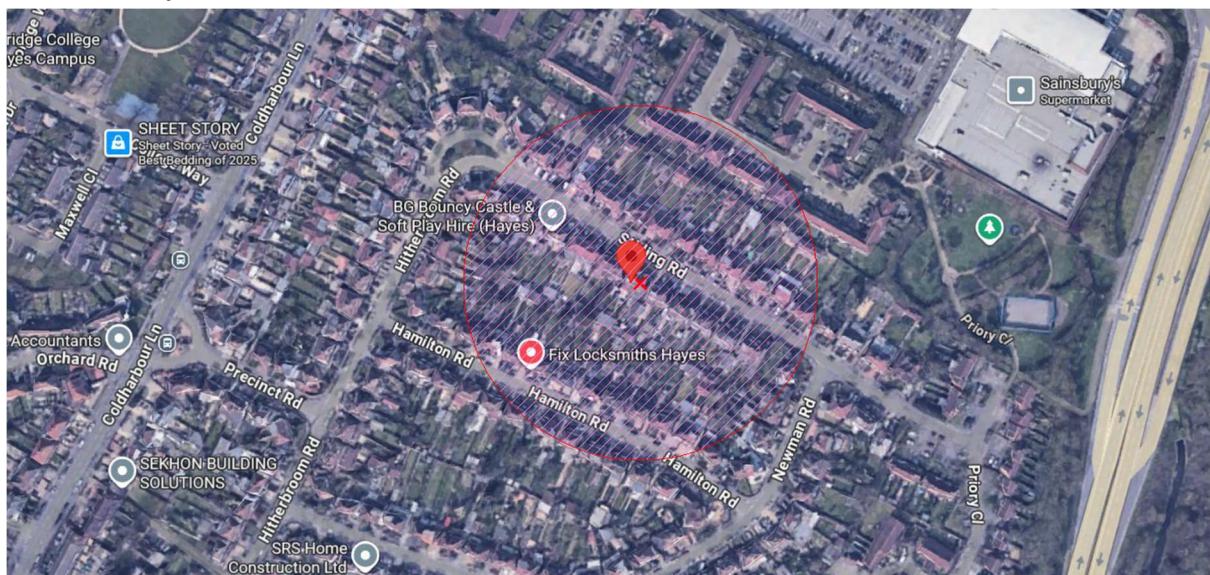


Fig. 4: Satellite map used for the calculation of the number of houses.

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 would operate subject to two dedicated management frameworks, submitted as part of this application, 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. These comprise:

- 1) HMO Management and Supervision Plan**
- 2) Site Supervision and Management Plan**

Together, these documents set 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.

In support of this application, regard is had to a recent appeal decision relating to a change of use from Class C3 to a Sui Generis HMO at 49 Central Avenue, Hayes, UB3 2BW, which involved a 7-bedroom, 7-person HMO in a comparable suburban residential location. In that case, the Inspector concluded that the living conditions of future occupiers would not be adversely affected by the proposal, notwithstanding the absence of a separate living room and limited amenity provision.

By comparison, the current proposal provides an appropriate level of internal living accommodation and external amenity space, proportionate to the scale of the development. 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 HMO Management and Supervision Plan and Site Supervision and Management 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 **extant planning permissions**, 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 is supported by a comprehensive **HMO Management and Supervision Plan**, which provides 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 one to two off-street parking spaces, and the site is not subject to any on-street parking restrictions or a Controlled Parking Zone (CPZ). As part of the proposal, one off-street parking space would be retained, which accords with the maximum car parking standards set out in the London Plan for this location.

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.

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 proposed cycle storage arrangements are conveniently located and easily accessible for future occupiers.

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 two 240-litre wheeled refuse bins to be accommodated within the site in a designated storage area. 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 submitted 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 robust **HMO Management and Site Supervision Plans**, 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.

- End of Statement -