

HMO PLANNING STATEMENT
IN SUPPORT OF PLANNING APPLICATION

AT

33 PARKFIELD AVENUE
HILLINGDON
UB10 0DF

KKR PLANNING & DESIGN LTD

Oasis Business Centres Ltd
468 Church Lane
Kingsbury
London
NW9 8UA
www.kkrpd.co.uk
Tel: 020 8200 2360

PROJECT No: KKR - 1711

August 2026

HMO PLANNING STATEMENT

Proposed Change of Use from Class C3 Dwellinghouse to Class C4 House in Multiple Occupation (5 Persons)

1.0 INTRODUCTION

This Planning Statement has been prepared in support of a revised planning application seeking permission for the change of use of **33 Parkfield Avenue, Uxbridge** from a single dwellinghouse (Use Class C3) to a **small House in Multiple Occupation (Use Class C4)** accommodating a maximum of **five unrelated individuals**.

This application follows the refusal of planning application **Ref. 53686/APP/2026/1380**, determined on 24 July 2026. The revised proposal has been carefully reviewed and amended having regard to the matters raised by the Local Planning Authority during the previous application and the subsequent refusal decision.

The revised scheme has been specifically designed to address the Council's concerns through a reduction in the level of occupation, improvements to the internal accommodation, revised operational arrangements and an enhanced site-specific management strategy.

The principal amendments include:

- Reduction in occupation from **six persons to five persons**.
- Enlargement of **Bedroom 2** from approximately **7.4m² to 7.84m²**, exceeding the benchmark minimum floor area identified by the Council.
- Retention of **Bedroom 5** at **7.6m²**, which already exceeds the benchmark minimum.
- Submission of revised furnished floor plans and updated room schedule.
- Revised refuse storage arrangements reflecting Hillingdon's bag-only waste collection system.
- Enhanced HMO Management Plan containing site-specific operational procedures.
- Additional management measures relating to noise control, refuse management, neighbour liaison and day-to-day operation.

The proposal has therefore evolved significantly from the previously refused scheme and should be considered on its own planning merits.

2.0 SITE DESCRIPTION

The application property comprises an existing end-of-terrace two-storey dwelling situated on the western side of Parkfield Avenue within an established residential area of Uxbridge.

The property currently benefits from:

- five bedrooms;
- shared living accommodation;
- kitchen and dining facilities;
- generous private rear garden;

- existing off-street parking to the front; and
- shared pedestrian side access to the rear garden.

No external alterations are proposed to the principal dwelling. The external appearance of the property will therefore remain unchanged and the proposal will preserve the established character and appearance of the surrounding residential street.

The surrounding area is characterised predominantly by traditional family housing with similar residential properties of comparable scale and appearance.

3.0 PLANNING HISTORY

Planning permission was previously sought for the change of use of the property from Use Class C3 to a six-person Class C4 House in Multiple Occupation under planning application reference **53686/APP/2026/1380**.

The application was refused on 24 July 2026 for two principal reasons:

1. The Council considered that the proposal would result in an unacceptable intensification of the use of the property leading to increased activity, noise and disturbance that would adversely affect neighbouring residential amenity. The submitted HMO Management Plan was also considered insufficiently robust to adequately mitigate these concerns.
2. The Council considered that the proposal had failed to demonstrate satisfactory living conditions for future occupiers due to the limited size and usability of Bedrooms 2 and 5 together with concerns regarding the first floor shower room arrangement.

During the course of the previous application the Council requested further information and amendments relating to the internal layout, sanitary provision, refuse arrangements and management procedures. Unfortunately, those amendments were not submitted before the application was determined. The revised submission now incorporates those requested changes together with further improvements to the overall scheme.

4.0 PROPOSED DEVELOPMENT

Planning permission is sought for the change of use of the existing dwellinghouse from Use Class C3 to a small Class C4 House in Multiple Occupation accommodating a **maximum of five residents**.

The revised accommodation comprises:

Ground Floor

- Bedroom 1 (single occupancy)
- Shared kitchen
- Shared living/dining room
- Shower Room 1
- Separate WC
- Covered refuse storage
- Covered cycle storage

- Private rear garden

First Floor

- Bedroom 2 (single occupancy)
- Bedroom 3 (single occupancy)
- Bedroom 4 (single occupancy)
- Bedroom 5 (single occupancy)
- Shared Shower Room 2

Each bedroom will accommodate **one resident only**.

No bedroom is proposed for double occupancy.

The maximum occupancy of the property will therefore be limited to **five residents**.

The property will continue to benefit from generous communal accommodation together with substantial private rear garden space significantly exceeding the Council's normal expectations for external amenity provision.

5.0 REVISIONS TO THE PREVIOUSLY REFUSED SCHEME

Following careful consideration of the Council's consultation comments, officer report and refusal decision, the proposal has been comprehensively revised.

The revised scheme is not simply a resubmission of the previous proposal but represents a materially improved development specifically designed to overcome the issues previously identified.

The principal revisions are summarised below.

Previously Refused Scheme	Revised Proposal
Six-person HMO	Reduced to five-person HMO
Bedroom 2 – approximately 7.4m ²	Bedroom 2 enlarged to approximately 7.84m²
Bedroom 5 – 7.6m ²	Retained at 7.6m² (already compliant with the Council's benchmark)
General Management Plan	Completely revised site-specific Management Plan
Refuse arrangements required clarification	Refuse storage and presentation arrangements revised
Limited operational controls	Enhanced management procedures including neighbour liaison, complaint handling and noise management

The reduction in occupancy from six residents to five residents represents a significant reduction in the intensity of the proposed use and will naturally reduce the frequency of daily movements, visitor activity, use of communal facilities and overall pressure on the property.

In addition, Bedroom 2 has been redesigned and enlarged to provide approximately **7.84m²** of usable floor area, thereby exceeding the benchmark identified by the Council during the previous application. Bedroom 5 remains at **7.6m²**, which already exceeds the same benchmark and continues to provide satisfactory accommodation for single occupancy.

The revised proposal also benefits from an enhanced HMO Management Plan containing detailed procedures relating to day-to-day management, refuse collection, neighbour liaison, complaint handling, tenant management, garden use and noise control. These measures provide a significantly more robust management framework than previously submitted and directly respond to the Council's concerns regarding the operation of the property.

Taken together, these amendments demonstrate that the revised proposal has evolved substantially from the previously refused scheme and provides a significantly improved form of development that addresses the matters previously identified by the Local Planning Authority.

6.0 PLANNING POLICY CONTEXT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The Development Plan for the site comprises:

- Hillingdon Local Plan: Part One – Strategic Policies (2012);
- Hillingdon Local Plan: Part Two – Development Management Policies (2020);
- London Plan (2021); and
- National Planning Policy Framework (2024).

The principal policies relevant to this application include Policies DMH1, DMH5, DMHB11 and DMHB16 of the Hillingdon Local Plan together with London Plan Policies D3, D6 and D14, which seek to ensure that new development provides high quality accommodation whilst safeguarding the amenities of existing and future occupiers.

The proposal has been carefully reviewed against these policies and has been amended following the Council's previous comments to ensure that the revised development provides an appropriate standard of accommodation whilst protecting the residential amenities of neighbouring properties.

7.0 PLANNING ASSESSMENT

7.1 Principle of Development

The application seeks planning permission for the change of use of an existing dwellinghouse (Use Class C3) to a small House in Multiple Occupation (Use Class C4) accommodating a maximum of five unrelated individuals.

The Council's Article 4 Direction removes permitted development rights for changes of use from Class C3 to Class C4 and therefore planning permission is required. However, the Article 4 Direction does not establish a presumption against HMOs. Rather, each proposal

must be considered on its individual planning merits having regard to the Development Plan and all other material planning considerations. The officer report also acknowledges that a C4 HMO is acceptable **in principle**, subject to compliance with relevant planning policies and material considerations.

The revised proposal continues to provide residential accommodation within an established residential area and therefore remains consistent with the overall objectives of national and local planning policy to make efficient use of the existing housing stock whilst contributing towards meeting housing needs.

The proposal does not involve the loss of a residential use, demolition of the existing dwelling or any external alterations that would adversely affect the character or appearance of the surrounding area. The property will continue to function as residential accommodation, with the only change being the occupation by a maximum of five unrelated individuals rather than a single household.

The proposal should therefore be considered acceptable in principle, subject to the detailed assessment of residential amenity, living conditions and operational management.

7.2 Residential Character and Impact on the Surrounding Area

The previous refusal concluded that the proposed six-person HMO would represent an unacceptable intensification of the use of the property resulting in increased activity, comings and goings, noise and disturbance harmful to the character of the area and neighbouring residential amenity.

The revised proposal has been specifically amended to address those concerns.

Most significantly, the proposed level of occupation has been reduced from **six residents to five residents**, representing approximately a **17% reduction in the intensity of occupation** compared with the previously refused scheme.

This reduction is reflected throughout the operation of the property, including:

- reduced daily movements to and from the property;
- reduced use of communal facilities;
- reduced demand on shared sanitary facilities;
- reduced refuse generation;
- reduced use of the rear garden; and
- reduced overall activity within the property.

Unlike the previously refused proposal, the revised scheme has also been supported by a significantly enhanced HMO Management Plan containing detailed site-specific management procedures to regulate the day-to-day operation of the property.

The property will remain externally indistinguishable from a traditional dwellinghouse. No extensions or external alterations are proposed and the existing appearance of the building will remain unchanged.

The revised proposal therefore preserves the established residential character of Parkfield Avenue.

7.3 Impact on Neighbouring Residential Amenity

Policy DMH5 of the Hillingdon Local Plan requires HMOs to safeguard the amenities of adjoining residential properties.

The revised proposal has been carefully designed to ensure that neighbouring occupiers are not adversely affected by the proposed use.

The Council's previous concerns principally related to the potential for increased noise and disturbance associated with six unrelated occupiers. The revised proposal materially reduces that concern by limiting occupation to **five residents** and introducing significantly enhanced operational management procedures.

Each bedroom is intended for **single occupancy only**, and the overall occupancy of the property will be limited accordingly. This restriction substantially reduces the potential intensity of occupation compared with the previous proposal.

The communal accommodation remains centred around the existing living room and kitchen, encouraging shared use of the property rather than excessive reliance upon individual bedrooms.

The generous rear garden provides ample private outdoor amenity space for future occupiers and reduces pressure on internal communal areas. The use of the garden will be actively managed through the HMO Management Plan, which includes restrictions on late evening use, gatherings and amplified music.

Furthermore, the revised Management Plan introduces a range of operational controls including:

- named property manager;
- regular property inspections;
- formal complaint procedure;
- tenant induction process;
- tenancy conditions relating to neighbour consideration;
- refuse management procedures;
- noise management measures; and
- enforcement procedures for breaches of tenancy conditions.

These measures provide a significantly more robust management framework than that previously submitted and ensure that the day-to-day operation of the HMO is proactively managed in a manner compatible with the surrounding residential environment.

The proposal also retains the existing off-street parking provision, secure cycle storage and generous private amenity space, all of which contribute positively towards the sustainable operation of the property.

The Highway Authority raised **no objection** to the previous proposal, confirming that the parking provision and cycle parking arrangements were broadly acceptable and would not result in an unacceptable impact on highway safety.

Accordingly, it is considered that the revised proposal would not result in unacceptable harm to the character of the area or the amenities of neighbouring occupiers and therefore complies with the objectives of Policies DMH5, DMHB11, London Plan Policies D3 and D14 and the relevant provisions of the National Planning Policy Framework.

7.4 Living Conditions for Future Occupiers

Policy DMHB16 of the Hillingdon Local Plan, together with London Plan Policy D6, seeks to ensure that residential accommodation provides a high standard of internal living conditions and functional layouts appropriate for future occupiers.

The previous application was refused partly due to concerns regarding the size and usability of Bedrooms 2 and 5, together with the constrained layout of the first-floor shower room. The revised proposal has been specifically amended to address these matters and now provides an improved standard of accommodation throughout the property.

The revised HMO will provide five single occupancy bedrooms together with generous communal living accommodation comprising a shared kitchen, dining and living area. The communal facilities remain appropriate for the proposed number of occupiers and encourage shared use of the property whilst maintaining satisfactory levels of privacy for individual residents.

The bedroom accommodation now comprises:

Bedroom Floor Area Occupancy

Bedroom 1	15.7m ²	Single
Bedroom 2	7.84m²	Single
Bedroom 3	13.3m ²	Single
Bedroom 4	12.8m ²	Single
Bedroom 5	7.6m²	Single

Bedroom 2 has been enlarged from the previously submitted layout and now provides approximately **7.84m²**, thereby exceeding the benchmark minimum floor area referred to by the Council during the previous application.

Bedroom 5 continues to provide approximately **7.6m²**, which also exceeds the benchmark minimum identified by the Council and remains suitable for single occupancy.

All bedrooms benefit from:

- natural daylight;
- natural ventilation;
- outlook;
- adequate ceiling height;
- sufficient space for a bed, wardrobe and study desk;
- convenient access to communal facilities.

Revised furnished floor plans and an accompanying room schedule have been prepared to demonstrate the practical usability of each bedroom and confirm that all rooms provide a satisfactory standard of accommodation for future occupiers.

The revised proposal therefore provides improved living conditions and directly addresses the concerns previously raised regarding the internal layout and bedroom sizes.

Sanitary Provision

The previous application proposed accommodation for six occupiers, resulting in concerns regarding the adequacy of sanitary facilities.

The revised proposal accommodates **five residents only** and the sanitary provision has therefore been reassessed against the Hillingdon Minimum Standards for HMOs.

The property provides:

Facility	Provision
Ground Floor Shower Room	Shower, WC and wash hand basin
First Floor Shower Room	Shower, WC and wash hand basin
Separate Ground Floor WC	WC and wash hand basin

Accordingly, the property benefits from:

- two shower rooms;
- three WCs;
- three wash hand basins.

This level of provision comfortably exceeds the normal expectations for a five-person HMO and provides adequate facilities for future occupiers.

The revised first-floor shower room layout has also been amended to improve its functionality and usability. Although there are no prescribed planning standards for HMO shower room dimensions, the revised layout provides a practical arrangement that adequately serves the proposed level of occupation.

Overall, the revised proposal provides a satisfactory standard of residential accommodation consistent with the objectives of Policies DMHB16, DMH5 and London Plan Policy D6.

7.5 Parking and Highways

The proposal does not alter the existing vehicular access arrangements serving the property.

The property will continue to benefit from two existing off-street parking spaces located within the front forecourt together with secure covered cycle parking situated within the rear garden.

The Council's Highway Officer reviewed the previous application and concluded that no highway objection should be raised. The Highway Officer confirmed that the proposed

parking provision was broadly acceptable having regard to the Council's parking standards and that the proposed cycle parking arrangements complied with the adopted standards.

The revised proposal reduces the level of occupation from six residents to five residents. Consequently, the potential demand for vehicle parking is lower than that previously assessed by the Highway Authority.

No alterations are proposed to the existing access arrangements and the proposal will not materially affect highway safety, pedestrian safety or the efficient operation of the local highway network.

The proposal therefore continues to comply with Policies DMT1, DMT2 and DMT6 of the Hillingdon Local Plan together with the relevant transport policies of the London Plan.

7.6 Refuse Storage and Cycle Storage

The refuse storage arrangements have been revised following comments received from the Council's Waste Services team.

The proposal provides a covered refuse storage area located within the rear garden for the temporary storage of refuse bags between collection days.

In accordance with Hillingdon Council's bag-only collection system, refuse bags will be transferred via the existing shared side access to the front of the property on the evening before, or the morning of, the scheduled collection day.

The shared side access remains unobstructed throughout its length and provides adequate width to allow the convenient movement of refuse bags between the rear storage area and the front boundary.

The revised refuse arrangements have therefore been specifically designed to reflect the Council's operational waste collection requirements and will ensure that refuse is managed in a tidy, practical and efficient manner.

Secure covered cycle parking is also provided within the rear garden in accordance with the Council's adopted standards.

The cycle store is conveniently located adjacent to the existing side access, allowing residents to safely move bicycles between the public highway and the secure storage area without conflict with refuse storage or other external activities.

7.7 HMO Management Arrangements

A comprehensive revised HMO Management Plan accompanies this application.

The Management Plan has been significantly expanded following the Council's previous comments and now contains detailed site-specific operational procedures governing the day-to-day management of the property.

The property will be managed by the owner or an appointed professional managing agent who will act as the primary point of contact for residents and neighbouring occupiers.

The Management Plan includes detailed procedures relating to:

- day-to-day property management;
- tenant referencing and induction;
- property inspections;
- refuse management;
- complaint handling procedures;
- noise management;
- use of the rear garden;
- maintenance of communal areas;
- fire safety;
- anti-social behaviour;
- tenancy enforcement.

The tenancy agreement will include clear conditions requiring occupiers to respect neighbouring residents, minimise noise, maintain communal areas and comply with the operational rules governing the property.

Particular emphasis is placed on the management of external amenity areas. Residents will be required to use the rear garden responsibly, with restrictions on late evening use, amplified music and large social gatherings to minimise any potential impact upon neighbouring occupiers.

The property manager will undertake regular inspections to ensure compliance with the Management Plan and maintain written records of inspections, complaints and any remedial actions undertaken.

These enhanced management arrangements provide a significantly more robust operational framework than previously submitted and demonstrate that the property will be professionally managed throughout its operation.

7.8 Response to Public Representations

The previous application attracted a number of representations from local residents expressing concerns relating to parking, highway safety, noise, anti-social behaviour, refuse management, cumulative HMO impact, residential character and pressure on local infrastructure. These matters have been carefully considered in preparing the revised proposal.

Parking and Highway Safety

The revised proposal does not alter the existing vehicular access arrangements or increase the amount of hardstanding within the site.

The Council's Highway Officer confirmed during the previous application that the proposed parking provision was broadly acceptable and raised no objection on highway or parking grounds. The revised proposal further reduces the intensity of the development by limiting

occupation to five residents and therefore has the potential to generate fewer vehicle movements than the previously submitted scheme.

Residents will be encouraged to make use of sustainable modes of transport where possible and secure covered cycle parking has been provided within the site.

Accordingly, it is not considered that the proposal would give rise to any unacceptable impact upon highway safety or parking conditions within the surrounding area.

Noise and Disturbance

The revised proposal has been specifically designed to minimise the potential for noise and disturbance.

The reduction in occupancy from six residents to five residents results in a materially lower intensity of occupation and correspondingly reduces the frequency of daily movements, use of communal facilities and general activity within the property.

In addition, the revised HMO Management Plan introduces comprehensive operational controls including:

- named property manager;
- regular property inspections;
- tenant induction procedures;
- restrictions on visitors and gatherings;
- restrictions on the use of the rear garden during late evening hours;
- prohibition of amplified music;
- formal complaint investigation procedures;
- tenancy enforcement procedures where necessary.

These management measures will ensure that the property is operated in a responsible manner compatible with the surrounding residential environment.

Refuse Management

The revised refuse storage arrangements have been prepared in direct response to comments received from the Council's Waste Services team.

A covered refuse storage area is provided within the rear garden for the storage of refuse bags between collection days.

In accordance with Hillingdon Council's waste collection arrangements, refuse bags will be presented at the front boundary on the evening before or morning of collection via the existing shared side access.

The property manager will monitor compliance with these arrangements through routine inspections.

The revised refuse strategy will ensure that waste is stored and presented in an orderly manner and will minimise the potential for visual clutter or fly-tipping.

Anti-social Behaviour

The revised Management Plan adopts a zero-tolerance approach towards anti-social behaviour.

Prospective occupiers will be appropriately referenced before occupation and will be required to sign tenancy agreements containing specific obligations relating to neighbour consideration, noise, refuse management and responsible occupation of the property.

Any substantiated breaches of the tenancy conditions will be investigated promptly and, where necessary, formal enforcement action will be taken by the landlord or managing agent.

Residential Character

The proposal does not involve any external alterations to the dwelling and the building will continue to appear as a conventional residential property within the street scene.

The revised proposal remains a small-scale Class C4 HMO accommodating only five residents and does not alter the established appearance or visual character of Parkfield Avenue.

The reduction in occupancy together with the enhanced management arrangements ensures that the property will continue to operate in a manner compatible with the surrounding residential area.

Cumulative Impact

The application relates to the change of use of a single existing dwelling to a small Class C4 HMO accommodating five residents.

The revised proposal has been carefully designed to provide good quality accommodation whilst protecting neighbouring amenity through reduced occupancy, improved internal accommodation and comprehensive management arrangements.

It is therefore considered that the proposal would not result in an unacceptable cumulative impact upon the surrounding residential area.

8.0 PLANNING BALANCE

This revised application has been prepared following careful consideration of the Council's previous consultation comments, officer report and refusal decision.

The proposal has been materially amended to respond directly to the issues previously identified by the Local Planning Authority.

The principal improvements include:

- Reduction in occupancy from six residents to five residents.
- Enlargement of Bedroom 2 to approximately **7.84m²**, exceeding the benchmark floor area identified by the Council.
- Retention of Bedroom 5 at **7.6m²**, which exceeds the same benchmark.

- Improved internal accommodation for future occupiers.
- Revised sanitary provision appropriate for a five-person HMO.
- Revised refuse storage and presentation arrangements.
- Enhanced site-specific HMO Management Plan.
- Improved operational controls relating to neighbour amenity.
- Continued provision of secure cycle parking.
- Retention of off-street parking.
- No external alterations to the existing dwelling.

The revised proposal provides an appropriate balance between meeting local housing needs and protecting the amenities of neighbouring occupiers.

Unlike the previously refused proposal, the revised scheme incorporates a materially lower level of occupation together with enhanced management procedures specifically designed to address the Council's previous concerns.

The proposal therefore represents a sustainable and well-managed form of residential development that accords with the objectives of the Development Plan when read as a whole.

9.0 CONCLUSION

Planning permission is sought for the change of use of 33 Parkfield Avenue from a single dwellinghouse (Use Class C3) to a small House in Multiple Occupation (Use Class C4) accommodating a maximum of five residents.

The proposal has been comprehensively reviewed and amended following the refusal of the previous application and should be considered as a revised scheme rather than a resubmission of the previously refused proposal.

The reduction in occupancy from six residents to five residents, together with the enlargement of Bedroom 2, the retention of compliant bedroom sizes, the revised sanitary provision, improved refuse arrangements and the enhanced HMO Management Plan, directly address the matters identified by the Council during the previous application.

The revised proposal provides satisfactory living conditions for future occupiers whilst safeguarding the amenities of neighbouring residents through a combination of reduced occupation levels and robust day-to-day management arrangements.

The development remains residential in character, preserves the appearance of the existing dwelling, provides appropriate parking and cycle storage, and introduces no external alterations that would adversely affect the character of the surrounding area.

Having regard to the Development Plan as a whole and all other material planning considerations, it is respectfully considered that the revised proposal complies with the relevant provisions of the Hillingdon Local Plan, the London Plan and the National Planning Policy Framework.

Accordingly, it is respectfully requested that planning permission be granted.

KKR Planning & Design Ltd
August 2026