

Planning, Design and Access Statement

for:

Retrospective change of use from single family
dwellinghouse to an HMO

at:

11 Walford Road
Uxbridge
UB8 2NF

March 2024

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Site:

11 Walford Road, Uxbridge, Middlesex, UB8 2NF

Applicant:

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Document revisions

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1.0 Introduction

- 1.1 This Statement accompanies a planning application for the retrospective change of use of the existing single-family dwelling to a Home under Multiple Occupation.
- 1.2 The change of use has not carried out and does not propose any external alterations to the property, or any changes to the frontage or rear garden areas to the plot.
- 1.3 In most cases this kind of change of use would have been caught under Permitted Development criteria under Class L.
- 1.4 However, Hillingdon Borough Council have placed an Article 4 Direction over the Uxbridge South and Brunel Wards, of which this property falls into.
- 1.5 The property was occupied as an HMO on 24th January 2024. At the time of occupation, the applicant was not aware that the site fell within an Article 4 Area relating to permission being required for changing the use to an HMO. There was no intentional breach of planning control in January, and the applicant has sought to remedy the situation at their earliest opportunity on discovering the site falls within an Article 4 designation.
- 1.6 The application site has no relevant planning history and there are no applications proposing HMO uses within Walford Road, although two properties have HMO Licences from the information found on the Council's website.
- 1.7 The application site comprises of a single storey detached bungalow on the southern side of Walford Road. The first seven houses on the southern side of Walford Road, which runs west to east, are detached bungalows, before the street scene changes to being predominately a mix of pairs of semi-detached two storey properties and two storey terraced properties.

- 1.8 The northern side of the road is very similar in appearance, with the addition of some pairs of semi-detached bungalows.
- 1.9 Uxbridge town centre is less than one mile to the north, and approximately a 15 minute walk. Buckinghamshire New University Uxbridge Campus is also less than a mile to the north of the application site.
- 1.10 Walford Road is not located within a Conservation Area and neither is the building listed, and whilst Walford Road is sited north of the Greenway Conservation Area, it has no immediate impacts on the setting of the Conservation Area.
- 1.11 The road rises slightly from west to east. The road has parking restrictions on it and parking permits are required to park in the designated parking areas along the road.

2.0 Planning Analysis

Nationally

- 2.1 The National Planning Policy Framework (NPPF) was published in March 2012 and revised in July 2018, February 2019, July 2021 and again in September 2023, with the latest revisions issued in December 2023.
- 2.2 The NPPF provides the Government's framework for delivering sustainable development and facilitating economic growth through the planning process. Planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF is a material consideration in planning decisions.
- 2.3 Paragraph 8 states that there are 3 dimensions to sustainable development: economic, social and environmental. Development which helps to build a strong, responsive and competitive economy whilst supporting vibrant and healthy communities, providing housing to meet current and future requirements is to be achieved in a manner which protects the natural, built and historic environment.
- 2.4 The NPPF states at Paragraph 11 that at the heart of the document is a presumption in favour of sustainable development. For decision taking this means approving development proposals which accord with the development plan without delay and local planning authorities should positively seek opportunities to meet the development needs of the area. The presumption in favour of sustainable development is reiterated at Paragraph 49.
- 2.5 Paragraph 38 sets out that the Local Planning Authority should approach applications in a "positive and creative way" and should work collectively with the applicant to ensure that development is delivered to benefit the area socially, economically and environmentally.

- 2.6 Paragraph 47 states that applications should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 2.7 Paragraph 108 of the NPPF sets out that transport issues should be considered from the earliest stages of development proposals, so that, inter alia, opportunities to promote walking, cycling and public transport use are pursued.
- 2.8 Supporting paragraph 109 then goes on to state in addition that development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 2.9 Paragraph 111 gives consideration to parking standards which are set for residential development and that these, amongst other things, should take the following into account:
- a) The accessibility of the development;
 - b) The type, mix and use of the development;
 - c) The availability of and opportunities for public transport;
- 2.10 With regard to transport implications paragraph 115 is very clear in stating that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 2.11 Paragraph 128 requires policies and decisions to support development which makes “efficient use of land”. This considers the identified needs for a variety of housing mix and type and the availability of land to support it. The criteria also includes market conditions and viability, availability and capacity of infrastructure, maintaining the area’s prevailing character and setting and the importance of well-designed, attractive and healthy places.
- 2.12 Section 12 of the NPPF highlights the need for achieving well designed places.

The London Plan

- 2.13 Applicable London Plan Policies include, but not limited to D5, D6, H9, T6 and T6.1.
- 2.14 The standard of design is clarified within Policy D5 as does Policy D6 which considers housing quality and standards.
- 2.15 Policy H9 identifies that Boroughs should promote efficient use of existing housing stock to reduce the number of vacant and under-occupied dwelling, and also that they should take account of the role of houses in multiple occupation in meeting local and strategic housing needs.
- 2.16 Houses in multiple occupation (HMOs) are an important part of London's housing offer, reducing pressure on other elements of the housing stock.
- 2.17 London Plan Policy T6 and Policy T6.1 also highlight the need to provide appropriate parking standards for the development in line with a sites setting within the PTAL rating system.

Locally

- 2.18 The Policies within the London Borough of Hillingdon Local Plan Part 2 that the application should be considered against but not limited to, are: DMH1, DMH5, DHMB11, DMT1, DMT2, DMT5 and DMT6.
- 2.19 Policy DMH1 seeks to ensure that residential accommodation is not lost to protect and meet the projected housing needs. Any subdivision of existing dwellings needs to ensure adequate amenity and living spaces are provided.
- 2.20 For dwellings to be considered acceptable as being an HMO, Policy DMH5 requires the buildings needing to have good accessibility to local amenities and public transport, provide satisfactory living conditions and not result in an over prescription of HMO properties.

- 2.21 Design is covered within Policy DMHB 11 and seeks to ensure that all developments are designed to the highest standards and incorporates principles of good design, where it should be of an appropriate scale, height and mass to adjoining structures and also not result in adversely impact on amenities of adjacent properties. Additionally, schemes should also pick up on design vernaculars of the surrounding area.
- 2.22 Managing transport impacts is covered by Policy DMT 1 and considers how developments can be sustainable and can be accessible by public transport, walking and cycling and have no significant adverse transport or air quality impacts.
- 2.23 This is then continued into Policies DMT 2, DMT 5 and DMT 6 which highlight the need for developments to provide safe and efficient vehicular access to the highway network, appropriate provisions for parking of both cars and cycles and ensure that there is no impact on local amenities and congestion.

Key Planning Considerations

- 2.24 The key planning considerations are the following:

- i. Design Quality and Principle of Development
- ii. Relationship with Neighbouring Properties
- iii. Highways

i) Design Quality and Principle of Development

- 2.25 As previously mentioned in Section 1 of this Statement, the change of use to an HMO has not and does not require any external alterations to the exterior of the existing building. The building is retained in a form that is physically similar to other dwellings within the road, most notably the neighbouring bungalows.

- 2.26 The property is being rented out to NHS student paramedics studying at the Buckinghamshire New University Uxbridge Campus. Whilst there may be a concern that the property may only be rented out to students in the future, therefore turning the property into one that would have a termly occupation, it is deemed that in isolation the change to an HMO use would be likely to result in little to no harm to the setting.
- 2.27 Consequently the development is considered from a design point of view to be acceptable given that the HMO use will not have a detrimental impact on the street scene or wider area. It is also deemed not to have an impact on the setting of the Greenway Conservation Area to the south.
- 2.28 Furthermore, given that the property would remain in residential use, in a built-up residential area, the principle of the development would be acceptable.
- 2.29 The change to an HMO use will not change the amount of amenity provisions associated with the property. The tenants benefit from having the use of the garden and a kitchen/living/dining area, and all tenants have access to the bathroom.
- 2.30 The personal living spaces meet with the required standards for an HMO ensuring that all tenants have appropriate standards of living as all four bedrooms would satisfy the minimum 6.51sqm standard for a single bedroom as listed on the Government website detailing the guidance for HMOs.
- 2.31 The following link is where the information is provided:
- <https://www.gov.uk/government/publications/houses-in-multiple-occupation-and-residential-property-licensing-reform-guidance-for-local-housing-authorities/houses-in-multiple-occupation-and-residential-property-licensing-reform-guidance-for-local-housing-authorities>

2.32 The minimum sleeping room floor area sizes are:

3.4 What is the minimum sleeping room size?

The minimum sleeping room floor area sizes (subject to the measurement restrictions detailed in the paragraphs below) to be imposed as conditions of Part 2 licences are:

- 6.51 m² for one person over 10 years of age
- 10.22 m² for two persons over 10 years
- 4.64 m² for one child under the age of 10 years

2.33 According to the HMO database on the Council website, there are only two other HMOs on Walford Road at Nos 36 and 43, both of which are more than 100m from the application site.

2.34 Additionally, there have been no applications for properties to be used as HMO's along Walford Road.

2.35 The HMO at the application site would therefore not result in more than 20% of properties within 100 metres of a street length either side of an application property being in HMO use (C4/Sui Generis).

2.36 As a result of this the change to an HMO use would therefore be in compliance with Policy DMH5 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

2.37 Consequently, it is considered that the loss of the single family dwelling would not unacceptably undermine the Borough's housing provision, nor result in an over-intensification of HMO uses within the immediate vicinity of the site.

2.38 The retrospective change of use to an HMO therefore complies with Policies DMH1 and DMH5 from the Local Plan, and Policies H9, D5 and D6 from the London Plan. The scheme also adheres to the wording found within Section 12 of the NPPF.

ii) Relationship with Neighbouring Properties

2.39 The relationship with the neighbouring properties does not change as a result of the property being used as an HMO.

2.40 There are no alterations to the building and no alterations to the amenity provisions, so there are no changes with regards to overlooking or loss of privacy.

2.41 It is recognised that an HMO is a different type of occupation to use of the property as a single dwelling house. However, it is considered that the level of activity involved in travelling to work and for leisure and shopping purposes that would be associated with this HMO use would not be substantially different to the trip patterns of individuals in one single family dwelling household.

2.42 It is therefore considered, on balance, that any noise and disturbance that might result from the proposed HMO is unlikely to be significantly different to that from one large household that could occupy the property.

2.43 Consequently, the development is deemed to be compliant with Policies DMHB11 and DMH5 of the Local Plan, and Policies D5 and D6 of the London Plan.

iii) Highways

2.44 The local roadways are covered by extensive parking controls. The site is located within an area with a PTAL rating of 2, which is considered low and could put more reliance on the ownership and use of private motor vehicles.

2.45 However, the site is located close to the main A Road, A408, leading directly north into Uxbridge and south towards West Drayton, which would provide the tenants with access to other nodes of public transport.

- 2.46 There are bus stops less than a 5 minute walk in either direction on the A408, therefore making it a sustainable setting for the end users, as they are able to use bus services to get access to the rail networks and also other bus routes in both the Uxbridge and West Drayton town centres.
- 2.47 The property does not benefit from any parking spaces and never has done, even when it was a three bedroom single family dwellinghouse. The increase in the number of bedrooms to be four bedrooms would have no greater impact on the highway network or reliance on the use of cars than when it was in use a single family dwellinghouse.
- 2.48 The property has the ability to provide cycle parking for each tenant.
- 2.49 Whilst Policies DMT 1 and DMT 2 require the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety, the development is not considered to result in there being a severe impact on the Highways network in terms of vehicular movements/trip generation in an out of the site as there is no parking spaces within the curtilage of the site.
- 2.50 As the site is reliant on on-street parking in the first place as a single family dwellinghouse, it is not considered that the change to the HMO use has put any additional pressures or exacerbated on-street parking to the extent that highways safety or the free flow of traffic would be materially harmed.
- 2.51 Refuse bins can be placed within the frontage of the site on waste collection days, which will ensure that it complies with Councils adopted waste collection distance parameters.
- 2.52 The development for the retrospective change of use would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns, in accordance with Local Plan: Part 2 Development Plan Policies DMT1, DMT2 and DMT 6, and Policies T4, T5 and T6 of the London Plan (2021).

3.0 Conclusion

- 3.1 In light of the fact that the change of use to an HMO would be unlikely to breach the threshold requirements set out in parts B) i) and ii) of Policy DMH 5 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and the loss of the single family dwelling would not unacceptably undermine the Borough's housing provision, nor result in an over-intensification of HMO uses within the immediate vicinity of the site, the development, although retrospective in nature, is acceptable in principle.
- 3.2 The change of use will not have a detrimental impact on the neighbouring properties or the character of the area, and neither would it have a severe impact on the Highways network.
- 3.3 The change of use to an HMO has also been demonstrated to be compliant with the other relevant policies within the Local Plan, as well as the London Plan.
- 3.4 All tenants benefit from having habitable spaces that meet with the national space standards, as well as external amenity spaces appropriate to the size and use of the plot.
- 3.5 Taking the above into account, this planning application for retrospective consent for the change of use to a house of multiple occupation should be approved.