

# Planning Statement

**Change of use from C3 to small 5-person HMO (C4).**

**Address:** 70 Brackenbridge Drive, Ruislip, HA4 0LZ

## 1. Introduction

- 1.1. This Planning Statement accompanies an application for **planning permission to change the use of 70 Brackenbridge Drive, Ruislip, HA4 0LZ from a single dwellinghouse (Use Class C3) to a small House in Multiple Occupation (Use Class C4) to operate as a 5-bedroom, 5-person HMO.**
- 1.2. The Statement explains the site context and the proposed development, and then assesses the proposal against the Council's key areas of consideration, including the **principle of use, housing mix, HMO concentration, living conditions for occupiers, neighbour amenity, and highways/parking matters.**

## 2. Site Description

- 2.1. The application site is **70 Brackenbridge Drive, Ruislip, HA4 0LZ**, located within an established suburban residential area. The property sits on Brackenbridge Drive close to its junction with White Butts Road, with the wider streetscene characterised by two-storey (and frequently loft-converted) family houses set behind front gardens/driveways. The site also benefits from an open aspect to nearby public open space within the immediate locality, reinforcing the low-rise, residential character of the area.



**Image 1: Areal photo of the site and surrounding neighbourhood.**

- 2.2. The property is in lawful residential use as a **single dwellinghouse (Use Class C3)** and comprises a **6-bedroom family home** arranged over **three storeys following a loft conversion**. The existing internal arrangement provides generous day-to-day living accommodation typical of a family house, with multiple habitable rooms and supporting facilities distributed across the floors, and no changes to the building's external form are required to describe the existing baseline.
- 2.3. Externally, the site includes both front and rear private amenity areas. The **rear garden measures approximately 75 sqm**, providing a usable private outdoor space suitable for family occupation. To the front, the property benefits from a **front garden of approximately 81 sqm**, incorporating hardstanding that accommodates **off-street car parking** (with capacity for **three vehicles**). Boundaries are typical of the street, with the dwelling set back from the highway and the frontage functioning as the primary access/parking area.
- 2.4. In transport terms, the site has a **PTAL rating of 1a (very low public transport accessibility)**. Notwithstanding this, the site is within walking distance of day-to-day services and public transport connections. The surrounding highway network is typical of a residential neighbourhood and the availability of on-site parking is an important characteristic of the property in this location.
- 2.5. Relevant nearby amenities include the following (with information about walking distance and time obtained from **Google Maps**):
- Shops
    - **Tesco Express** - 0.4 miles (**9 min** walk)
    - **Boots** - 0.4 miles (**9 min** walk)
    - **Londis** - 0.4 miles (**9 min** walk)
    - **Victoria Retail Park** (Currys, Screwfix, Wickes, TK Maxx, Aldi) - 0.6 miles (**14 min** walk)
    - **Asda South Ruislip Superstore** - 0.8 miles (**18 min** walk)
    - **Sainsbury's Super Store** - 0.7 miles (**16 min** walk)
  - Public transport
    - **South Ruislip Station** (Train and Tube) - 0.8 miles (**18 min** walk)

- **Long Drive (Stop N)** - 282 route (every 10-13 minutes) - 0.2 miles (**5 min walk**)
  - **Malvern Avenue (Stop S)** - 282 route (every 10-13 minutes) - 0.2 miles (**5 min walk**)
  - Medical
    - **Acrefield Surgery** - 0.4 miles (**8 min walk**)
    - **Queens Walk Medical Centre** - 0.4 miles (**8 min walk**)
- 2.6. Overall, the site comprises a very large family dwelling with generous internal accommodation, established private amenity space to the rear, and meaningful on-site parking provision to the front, set within a predominately residential context with access to local services and public transport options, albeit within a low-PTAL area.

### 3. **Proposal**

- 3.1. The application seeks **planning permission for a change of use from a single dwellinghouse (Use Class C3) to a small House in Multiple Occupation (Use Class C4)**, to operate as a **5-bedroom, 5-person HMO**. The proposed occupancy is explicitly limited to **five residents**, with the accommodation arranged across the existing three-storey property. In line with the assessed scheme, **Bedroom 4 is excluded from use as a bedroom and will be retained as a study/store**, to ensure the proposal remains a modest-intensity C4 use and to avoid any “bedroom creep” over the lifetime of the permission.
- 3.2. The proposal is primarily a **change of use** and does not rely on any material alterations to the building’s external form. Internally, the layout is organised to provide a high standard of shared accommodation, with generous communal provision. The existing arrangement allows for **two separate living rooms** (including the former family room repurposed as an additional living room), alongside a **large kitchen / dining area**, ensuring that residents have adequate shared space and reducing pressure on any single room. This approach intentionally **maintains the character and functionality of the property as a family-type dwelling in its layout and amenity offer**, and the accommodation remains readily capable of operating as a conventional family home should the use revert in the future.

- 3.3. The proposal is primarily a **change of use** and does not rely on any material alterations to the building's external form. Internally, the layout is organised to provide a high standard of shared accommodation, with generous communal provision. The existing arrangement allows for **two separate living rooms** (including the former family room repurposed as an additional living room), alongside a **large kitchen / dining area**, ensuring that residents have adequate shared space and reducing pressure on any single room. This approach intentionally **maintains the character and functionality of the property as a family-type dwelling in its layout and amenity offer**, and the accommodation remains readily capable of operating as a conventional family home should the use revert in the future.
- 3.4. Car parking arrangements are retained as existing. The proposal **keeps the three off-street parking spaces** within the front garden/hardstanding, which is a strong compliance point in this low PTAL location and helps minimise any risk of overspill parking on surrounding streets. In addition, the scheme introduces a new sustainable transport measure through the provision of **secure cycle storage for six bicycles** within the front garden. This will be delivered as a covered/lockable store with practical access, and is intentionally sized to meet (and exceed) typical expectations for cycle provision for this scale of HMO.
- 3.5. The proposed HMO accommodation comprises **five single bedrooms**, each of a practical size and regular shape, and each served by natural light/ventilation via an external window as shown on the submitted plans:
- **Bedroom 1 (ground floor)** measures approx. **14.0 sqm**,
  - **Bedroom 2 (first floor)** measures approx. **13.4 sqm**,
  - **Bedroom 3 (first floor)** measures approx. **12.5 sqm**,
  - **Bedroom 4** measures approx. **9.1 sqm**, and
  - **Bedroom 5** measures approx. **11.2 sqm**.
- 3.6. Collectively, these rooms provide a balanced spread of bedroom sizes across the dwelling and, with the strong communal provision elsewhere in the property, support good living conditions for occupiers.
- 3.7. For clarity, the core components of the proposal are:
- Change of use **C3** → **C4** for a **5-person HMO** (five residents).

- **Bedroom 4 retained as “study/store”** (not a bedroom), with the five bedrooms used for occupation being **Bedrooms 1, 2, 3, 5 and 6**.
- **No material external alterations** to the building; the scheme is focused on use and internal arrangement.
- **Retention of 3 off-street parking spaces**.
- **Provision of secure cycle storage for 6 bicycles** within the front garden.

#### 4. Principles of Development

##### 4.1. Principle of use and housing mix

- 4.1.1. This proposal is deliberately positioned as a **modest-intensity small HMO (Use Class C4) for five people** rather than a high-intensity, large HMO. That distinction matters in Hillingdon decision-making. The Council’s recent refusal at **54 Bridgwater Road** placed significant weight on the **permanent loss** of a family-sized dwelling arising from an **8-person Sui Generis HMO**, and noted that the loss of “fallback” flexibility weighed heavily in the balance. In contrast, this application seeks a **C3→C4** change only (not Sui Generis), and therefore does **not create the same permanent planning lock-in** that concerned the Council in the Bridgwater Road case. The officer report itself recognises that **a C4 property may revert to C3 without planning permission**, meaning the family-home “fallback” remains realistic in planning terms.
- 4.1.2. Beyond the legal use-class distinction, the proposal also **retains the functional characteristics of a family dwelling in the layout itself**. The accommodation continues to read as a coherent dwellinghouse, with generous shared rooms and an overall arrangement that could readily serve family occupation in the future. The scheme explicitly **retains a non-bedroom study/store room** (Bedroom 4 excluded), and provides **two separate living rooms** alongside a large kitchen/dining space, so the internal environment continues to function like a family home rather than a “maximised” HMO layout. This is an important practical distinction from schemes where communal space is squeezed to create additional bedrooms, which is often what drives the “loss of family home” concern in substance as well as in policy terms. The planning judgement, therefore, is that while any change from C3 to C4 engages housing-mix sensitivities, **the degree of harm is materially reduced here** by (i) the modest capped occupancy, (ii) the retained family-style layout and study, and (iii) the

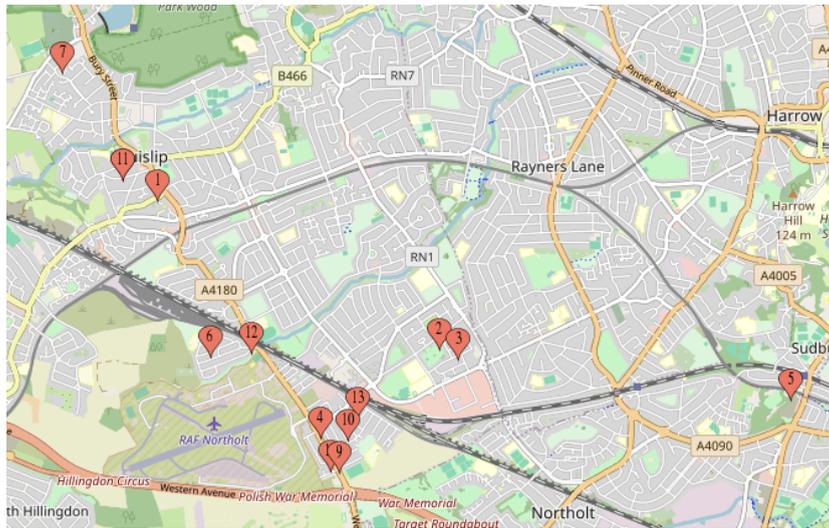
retained ability for the property to operate again as a single family dwelling without further consent.

- 4.1.3. This application also accepts the Council's Article 4 context. The Article 4 Direction is **not intended to prevent HMOs outright**, but to ensure proposals are scrutinised against Local Plan criteria and the evidence base on cumulative impacts. This proposal is aligned with that purpose: it is a controlled, policy-led small HMO with clear mitigation and enforceable limits, rather than an intensification that undermines local housing mix.

## **4.2. HMO policy compliance and concentration**

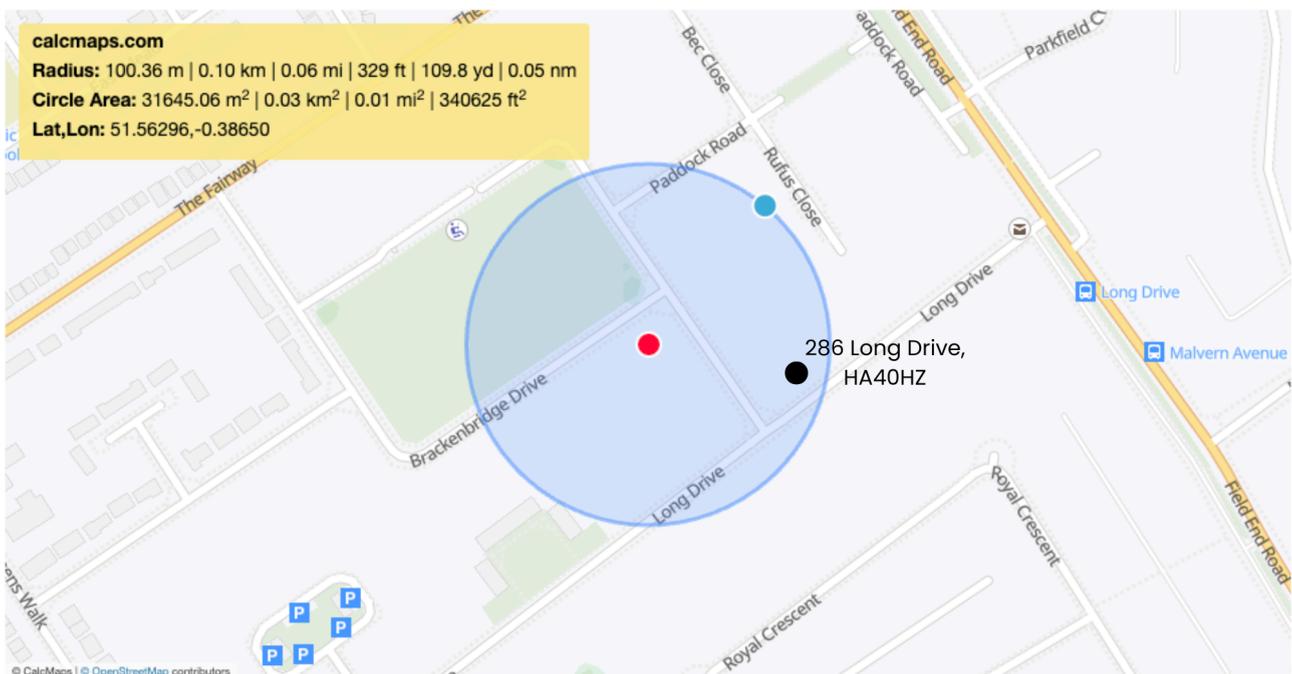
- 4.2.1. The HMO considerations that the Council repeatedly focuses on **location suitability, living standards, neighbour impacts, and overconcentration**. These are addressed directly by the scheme's scale and safeguards. The feasibility assessment highlights that, at **five occupants**, the accommodation and communal provision are "broadly strong" and that the key technical point to evidence is the **100m-radius concentration test** (with a simple methodology).
- 4.2.2. Although the site is located in a low PTAL area, there are many amenities in the surrounding area as outlined in the site description section. Within reasonable walking distances the tenants would be able to access shops and medical facilities. The site is located within 14 minute walking distance to Victoria Retail Park, and there are grocery stores located within 10 minute walking distance.
- 4.2.3. A 100m-radius HMO concentration check has been undertaken to address the Council's overconcentration test. For the purposes of this assessment, the same "counted" categories referenced by the Council have been used (i.e. properties recorded as licensed HMOs, properties benefitting from C4 / Sui Generis HMO planning consent, and other HMOs known to the Council, alongside any relevant council tax student exemption evidence where applicable).
- 4.2.4. The review has been completed as a desktop exercise using the Council's published HMO licence register (December 2025) and a search of the Council's online planning records for nearby C4 / Sui Generis HMO consents. This approach aligns with the feasibility recommendation to submit a straightforward, date-stamped methodology that clearly explains the sources used and the basis of the count. The following HMOs were found:

- Licensing Register
  - Flat 2, 60 High Street, Ruislip, HA4 7AA
  - 286 Long Drive, South Ruislip, HA4 0HZ
  - 1 Palace Road, South Ruislip, HA4 0PS
  - 30 Station Approach, South Ruislip, HA4 6RY
  - 28 Cavendish Avenue, South Ruislip, HA4 6QH
  - 23 Bromley Crescent, South Ruislip, HA4 6PQ
  - 40 Brickett Close, Ruislip, HA4 7YE
  - 9 Sharps Lane, Ruislip, HA4 7JG
  - 65 Mahlon Avenue, South Ruislip, HA4 6SZ
  - 3 Deane Avenue, South Ruislip, HA4 6SP
  - Flat 1, Cheyne Court, High Street, Ruislip, HA4 8LB
  - Flat 2, Cheyne Court, High Street, Ruislip, HA4 8LB
  - Flat 3, Cheyne Court, High Street, Ruislip, HA4 8LB
  - Flat 4, Cheyne Court, High Street, Ruislip, HA4 8LB
  - Flat 5, Cheyne Court, High Street, Ruislip, HA4 8LB
- Planning Portal
  - 9 Sharps Lane, Ruislip, HA4 7JG
  - 278A West End Road, Ruislip, HA4 6LS
  - 39 Great Central Avenue, Ruislip, HA4 6TT
  - 247 West End Road, Ruislip HA4 6QR



**Image 2: Mapping of found HMO addresses in Ruislip Ward**

4.2.5. The results of the search indicate that there is **1 licensed HMOs (286 Long Drive, HA4 0HZ)** recorded within the defined **100m catchment** of the application site, and **no nearby C4 / Sui Generis HMO planning consents identified within the same catchment** for the purposes of the concentration test.



**Image 3: 100m radius around the site showing 1 HMO at 286 Long Drive.**

4.2.6. On this basis, the proposal would **not** result in, or contribute to, an unacceptable concentration of HMOs and would sit comfortably within the Council's 100m overconcentration threshold (i.e. **less than 15%** of

properties within 100 metres of a street length either side of the application property meeting the relevant HMO criteria). The scheme therefore accords with the Council's overconcentration approach and the "in principle" HMO test in this respect.

- 4.2.7. The outcome of the concentration review also provides a helpful market signal about local supply. The low number of licensed HMOs suggests that there is **very limited provision of formally managed, single-bedroom shared accommodation in this part of Ruislip**. Particularly given the proximity of large commercial areas (i.e. Victoria Retail Park), which require accommodation for working professionals working there.
- 4.2.8. In that context, a modest **five-person C4 HMO** would contribute a small quantum of **more affordable, flexible one-bedroom accommodation** for people who are not able to access or sustain the costs of a whole dwelling, without creating an overconcentration issue. The proposal therefore supports choice within the local housing offer while remaining controlled in scale and compliant with the Council's concentration policy tests.

### **4.3. Living conditions for future occupiers**

- 4.3.1. The proposal provides a very strong internal environment for occupiers, which is one of the principal tests in HMO decision-making. The feasibility review notes that the property benefits from **multiple shared spaces (living, dining, former family room, kitchen)** and reads as "broadly strong" for five occupants. This is an important differentiator from many refused HMO schemes where communal space is marginal or poorly laid out. The five bedrooms are distributed across the dwelling, supported by generous communal areas, and the arrangement avoids overcrowding pressure by limiting occupancy and retaining a dedicated study/store rather than pushing the building to its maximum bedroom yield.

### **4.4. Neighbour amenity, noise and day-to-day management**

- 4.4.1. Concerns about noise, comings and goings, refuse, and general "HMO perception" are common. The key is that the proposal is structured to **minimise intensity and manage behaviour**, rather than simply relying on room sizes.
- 4.4.2. First, the capped occupancy of **five residents** is inherently modest when compared with larger HMO schemes. Secondly, the internal arrangement (two living rooms plus generous kitchen/dining) disperses activity and

reduces the likelihood of noise concentration or spill-out impacts. Thirdly, the applicant will submit/adhere to an **HMO Management Plan** that covers quiet hours, visitor expectations, refuse presentation, and a clear complaints/rapid response contact, precisely the kind of practical mitigation the feasibility report recommends to address neighbour amenity concerns.

- 4.4.3. It is also notable that in the Bridgwater Road case, even with eight occupants, officers concluded that neighbour amenity impacts from the use would **not be significant**, and the report records that there was **no objection** overall in respect of neighbour amenity. This proposal is materially less intensive and incorporates stronger control measures from the outset, so it is robustly positioned on residential amenity.

#### **4.5. Private outdoor amenity space**

- 4.5.1. The site retains a generous private rear garden appropriate to the level of occupation, and the feasibility report identifies this topic as a **clear positive**, noting that the garden is typical of family units and is suitable for the intensity proposed. The scheme does not involve harmful loss of usable private amenity space, and the outdoor provision remains compatible with both family and shared occupation.

#### **4.6. Highways, parking and sustainable travel**

- 4.6.1. Transport impacts are often scrutinised more closely where PTAL is low; the feasibility report explicitly flags that **PTAL 1a** will trigger scrutiny and that the strongest mitigation here is **full on-site parking compliance**. This proposal performs strongly on that basis: it retains **three off-street parking spaces**, which aligns with the Council's typical expectation of **one space per two occupants** for HMOs up to six people (i.e., 2.5 spaces interpreted as three). In practical terms, this materially reduces the risk of overspill parking stress, particularly important in a suburban location.
- 4.6.2. The Bridgwater Road decision is again useful comparator evidence: despite the site's PTAL 2 and only **one on-plot parking space**, the Council's Highway Authority ultimately raised **no objection** following transport information, and the officer report emphasises that refusal on transport grounds would only be justified where impacts are severe. In this case, the baseline position is more favourable because the scheme provides **three** off-street spaces and is capped at **five** occupants from the outset.

- 4.6.3. To strengthen sustainable travel credentials, this proposal includes a **secure cycle store for six bicycles**. Locating the store within the front garden ensures convenient access, passive surveillance, and practical day-to-day usability.

#### 4.7. Planning balance

- 4.7.1. Taken as a whole, the proposal represents a **modest-intensity C4 HMO** that is specifically designed to meet the Council's HMO tests, rather than to maximise occupancy. The scheme is capped at **five residents**, retains a family-style layout with generous communal accommodation, and maintains good standards of amenity for future occupiers. It is also supported by meaningful on-site provision in a low-PTAL location, including **three off-street parking spaces** and a proposed **secure cycle store**.
- 4.7.2. The principal area of sensitivity is the change from C3 to C4 in housing mix terms. However, any policy harm is materially limited by the nature of the proposal: it is a small C4 use (not a higher-intensity form), it is explicitly controlled through an occupancy cap, and the internal arrangement retains the clear characteristics of a family dwelling (including two living rooms and a large kitchen/dining space), meaning the property is not "designed out" of family use in practical terms. In addition, the assessment of HMO concentration demonstrates that the proposal would not contribute to an unacceptable clustering of HMOs within the Council's 100m test area.
- 4.7.3. Against this limited and controlled policy tension, the proposal delivers clear public benefits. It provides a small quantum of **lower-cost, flexible single-bedroom accommodation** that meets a distinct local need, without creating an overconcentration issue or generating unacceptable impacts on neighbours. The scheme is also inherently low-impact in physical terms, as it does not rely on harmful external alterations, and it retains adequate amenity space and off-street parking provision appropriate to the scale of occupation proposed.
- 4.7.4. To provide the Council with confidence that the development will remain policy-compliant over the lifetime of the permission, the applicant is content for appropriate conditions to be imposed. These would ensure the use remains modest, well-managed, and aligned with the assessment set out in this Statement.

## 5. Conclusion

- 5.1. The application seeks permission for a **small, well-controlled C4 HMO for five residents** at 70 Brackenbridge Drive. The proposal is designed to be modest in intensity and to maintain good living conditions, supported by generous communal accommodation, retained private amenity space, and on-site transport provision (including retained off-street parking and proposed secure cycle storage).
- 5.2. The planning assessment demonstrates that the proposal would **not** result in an unacceptable concentration of HMOs, would provide acceptable standards of amenity for occupiers, and, through the combination of its layout and enforceable controls, would not give rise to undue impacts on neighbour amenity or the operation of the local highway network. Any housing-mix sensitivity arising from the change of use is materially reduced by the proposal's modest scale, the retained "family dwelling" characteristics of the layout, and the proposed safeguards to prevent intensification.
- 5.3. For these reasons, it is respectfully requested that the Council **accept this proposal and grant planning permission**, subject to appropriate conditions to secure the assessed occupancy, management arrangements, and cycle storage provision.