Development Management

APP REF No. 77246/APP/2026/456

DELEGATED DECISION

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

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

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

Case Officer:

Signature:

Date:

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

Team Manager:

Signature:

Date:

The decision notice for this application can be issued.

Director / Member of Senior Management Team:

Signature:

Date:

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

A

Item No.	**Report of the Head of Development Management and Building Control**
Address:	70 BRACKENBRIDGE DRIVE RUISLIP
Development:	Change of use from Class C3 (dwellinghouse) to Class C4 (small HMO for up to 5-persons)
LBH Ref Nos:	**77246/APP/2026/456**
Drawing Nos:	PP-14640367v1 A03 A02 A01 A04 A05 PS HMO MP
Date Plans received:	26-02-26 **Date(s) of Amendments(s):**
Date Application valid	26-02-26

1. SUMMARY

Planning permission is sought for the change of use from Class C3 single family dwellinghouse to a Class C4 HMO for 5 persons.

The proposal represents a material intensification of the existing single family dwelling, introducing five independent adults into a quiet, family-oriented area. This would lead to increased comings and goings, noise, disturbance and greater use of the rear garden, resulting in harm to neighbouring amenity. A HMO Management Plan was submitted during the final week of determination as well as amended plans however this plan does not outline any measures to mitigate these inherent impacts. The amended plans proposed further intensification of the site and this is addressed below in the 'proposed scheme' section.

The site is located within a residential catchment in Ruislip. The immediate roadway is devoid of waiting restrictions and neighbouring properties exhibit a reasonable degree of on-plot parking provisions which generally lessen on-street parking demand. The site exhibits a Public Transport Accessibility Level (PTAL) of 1a which is considered as 'very poor' and as such heightens dependency on the use of private motor transport to and from the address.

It is proposed to convert the existing 6-bedroom detached dwelling to an HMO (C4) accommodating 5-bedrooms suggesting an occupancy level of up to 5 persons. The existing property exhibits 3 established 'side by side' car parking spaces on the frontage served by a generously wide carriageway crossing which are to remain for the purposes of this application.

The proposed cycle storage within the front garden and refuse bins are also located to the front.

Whilst it is noted that HMO's can provide access to a form of residential accommodation to targeted occupants who do not have access to funds for other forms of residential accommodation. However it is clear from the evidence which formed the report to full council (as discussed below) that there is a considerable rise in the number of properties being converted from single family dwellinghouses to HMO's with substandard levels of living accommodation subjecting occupants to being confined to there bedroom in the absence of communal spaces despite in some cases being significantly extended at the detriment on the neighbourhood amenity. This demonstrates in an over intensification of which there are significant recognises and evidenced harm.

It is often the case from the Applicant that the level of harm which is derived from this type of development is akin or modestly above that of a standard family sized dwelling. However it is evidenced in recent appeal decisions (as outlined below) an increase in occupants would result in considerable harm to local area, neighbour amenity, the environment and the local highway network.

For these reasons, the proposal conflicts with relevant policies of the London Plan, Hillingdon Local Plan, and NPPF (2024) and is recommended for refusal.

2. RECOMMENDATION

REFUSAL for the following reasons:

1. NON2 Principle of Development

The proposed change of use from a Class C3 single dwellinghouse to a Class C4 HMO for five persons represents a significant and harmful intensification of the site. The use of the property by five unrelated individuals would introduce a markedly higher level of activity than the lawful use, resulting in an over-intensification that would harm the character of the area. The principle of development is therefore considered unacceptable and contrary to Policies DMH 1, DMH 5 and DMHB 11 of the Hillingdon Local Plan: Part Two (2020) and the NPPF (2024).

2. NON2 Neighbouring Amenity (General HMO Impacts)

The proposed development, by reasons of its increased number of independent occupiers, would generate materially greater noise, comings and goings, and garden use than the existing C3 dwelling, resulting in unacceptable disturbance to neighbouring residents. The submitted HMO Management Plan does not adequately mitigate these effects. The proposal is contrary to Policies DMH 5 and DMHB 11 of the Hillingdon Local Plan: Part Two (2020), Policies D3 and D13 of the London Plan (2021), and Paragraph 135(f) of the NPPF (2024).

INFORMATIVES

1. I52 Compulsory Informative (1)

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human

Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance.

DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 16	Housing Standards
DMHB 18	Private Outdoor Amenity Space
DMHD 1	Alterations and Extensions to Residential Dwellings
DMH 1	Safeguarding Existing Housing
DMH 5	Houses in Multiple Occupation
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D6	(2021) Housing quality and standards
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T6.1	(2021) Residential parking
LPP D14	(2021) Noise
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes
NPPF12 -24	NPPF12 2024 - Achieving well-designed places

3. CONSIDERATIONS

3.1 Site and Locality

The application site comprises a linked semi-detached dwelling located on the northern side of Brackenbridge Drive. The property is attached to 72 Brackenbridge Drive along the eastern site boundary. 68 Brackenbridge Drive is located along the western site boundary. To the north, the application site faces onto a large area of grass (Brackenbridge Field), beyond which lie other Brackenbridge Drive residential dwellings. To the south, the rear of the site backs onto the rear garden of 7 Whitebutts Road. The application site is located within a Critical Drainage Area, as identified in the Surface Water Management Plan (SWMP) for Hillingdon.

3.2 Proposed Scheme

Planning permission is sought for change of use from Class C3 (dwellinghouse) to Class C4 (small HMO for up to 5-persons)

- Bedroom 1 (ground floor) measures approx. 12.0 sqm, - 1 person
- Bedroom 2 (first floor) measures approx. 13.76 sqm, - 1 person
- Bedroom 3 (first floor) measures approx. 11.48 sqm, - 1 person
- Bedroom 4 measures approx. 9.39 sqm, - 1 person and
- Bedroom 5 measures approx. 12.21 sqm. - 1 person

OTHER SPACE:
Living room 9.41 sqm
Family room 11.75sqm
kitchen 13.32sqm
Study 6.09m2

OTHER - AMENDED PLANS SUBMITTED:

On 9 July 2026, the applicant submitted amended plans to the Local Planning Authority which proposed the creation of a seven-bedroom House in Multiple Occupation, in place of the five-bedroom HMO that forms the basis of the original planning application. Officers have carefully considered whether these amendments could be accepted as part of the current application. However, it is considered that the proposed changes constitute a fundamental alteration to the nature and scale of the development originally submitted as it would fundamentally change the description and development. The increase in the number of proposed bedrooms would materially change the intensity of the development and give rise to additional planning considerations requiring a comprehensive reassessment of the proposal, including further consultation with statutory consultees, neighbouring occupiers and other interested parties. In accordance with the principles of procedural fairness set out within the National Planning Policy Framework (NPPF) and the requirements of the development management process, such significant amendments cannot reasonably be accepted through the submission of amended plans. Instead, they would necessitate the submission of a separate planning application to enable the proposal to be properly assessed on its own merits. Accordingly, the amended plans submitted on 9 July 2026 have not been accepted by the Local Planning Authority, and this application has been determined solely on the basis of the originally submitted plans proposing a five-bedroom House in Multiple Occupation.

Officers also offered the applicants an option to withdraw however, they have intended to proceed with the original proposal.

3.3 Relevant Planning History

77246/APP/2022/2464 70 BRACKENBRIDGE DRIVE RUISLIP

Demolition of existing store and erection of a single storey extension to the rear

Decision: 27-09-2022 Approval

77246/APP/2022/1432 70 BRACKENBRIDGE DRIVE RUISLIP

Demolition of existing store and construction of single storey 4.5m rear extension with eaves height at 3m and total height of the extension at 3.2m with associated internal atlerations

Decision: 18-05-2022 No Further Action(P)

77246/APP/2022/1521 70 BRACKENBRIDGE DRIVE RUISLIP

Conversion of roof space to habitable use to include a rear dormer with juliette balcony, 2 front roof lights and conversion of roof from hip to gable end with new gable end window (Application for a Certificate of Lawful Development for a Proposed Development)

Decision: 06-07-2022 Approval

Comment on Planning History

77246/APP/2022/2464 - Householder - APPROVAL 27-09-22 - Demolition of existing store and erection of a single storey extension to the rear

4. Advertisement and Site Notice

4.1 Advertisement Expiry Date: Not applicable

4.2 Site Notice Expiry Date: Not applicable

5. Comments on Public Consult

PUBLIC

122 neighbouring properties were consulted on 05-03-26 and the consultation expired on 26-02-26. A petition was received from the public objecting on the application. The objections were based on the following reasons as summarised below:

- Impact on residential character: Residents believe the HMO would harm the quiet, family-oriented character of the street.
- Noise and disturbance: Concern that multiple unrelated occupants would generate unacceptable noise and activity levels.
- Parking and highway concerns: Fears that increased occupancy would worsen existing parking pressures and hinder emergency access.
- Waste, refuse and amenity issues: Higher occupancy is expected to create excess waste with insufficient storage, leading to potential overflow and pests.
- Safety and security concerns: Objections cite past issues with nearby HMOs and concerns about increased antisocial behaviour and safety risks.
- Impact on vulnerable groups and nearby school: Residents worry about safeguarding impacts due

to the proximity of families and a primary school.
- Pressure on local services and infrastructure: Concerns that additional residents would place strain on already stretched local services.
- Loss of family housing: The proposal is seen as contributing to the borough's shortage of family homes.
- Past local issues with similar properties: Residents reference previous significant problems linked to other HMOs in the area. The intensified occupation would lead to increased noise and disturbance, harming the
amenity of neighbouring residents.
- Approval may set a precedent for further HMOs, leading to a cumulative erosion of the area's residential character.

In excess of 120 individuals signed this petition in objection to this scheme.

Officer's Responses:
- The impacts on design and character are assessed in the following section.
- LBH's Highway Authority has been consulted on the impacts on highways and parking as outlined below.
- The impacts created from the HMO use and the increase in occupancy are discussed below.

INTERNAL

Waste Officer: Hillingdon Council is not a wheeled bin borough. Waste can be store in wheeled bins but would need to be put out for collection at front boundary of property as loose sacks on collection day

Highway Authority:

The proposal seeks permission to convert a 6-bedroom dwelling (Use Class C3) into a Five-person House in Multiple Occupation (HMO).

Hillingdon Local Plan: Part 2 Policy - DMT 6 requires that new development will only be permitted where it accords with the council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network. There is no regional standard that can be applied.

The local standard for an HMO use with up to 6 occupants requires a maximum of "1 parking space per 2 occupants". On this premise, 2-3 on-plot spaces would be required for an occupancy level of 5 persons hence the standard is met in this case.

On this basis, there are no sustainable grounds for objection related to the level of on-plot parking provision as the site can comfortably accommodate 2-3 parking spaces.

OFFICER COMMENTS: The above comments are further assessed below.

6. Local Plan Designation and London Plan

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

Part 1 Policies:

PT1.BE1	(2012) Built Environment

Part 2 Polices:

DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 16	Housing Standards
DMHB 18	Private Outdoor Amenity Space
DMHD 1	Alterations and Extensions to Residential Dwellings
DMH 1	Safeguarding Existing Housing
DMH 5	Houses in Multiple Occupation
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D6	(2021) Housing quality and standards
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T6.1	(2021) Residential parking
LPP D14	(2021) Noise
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes
NPPF12 -24	NPPF12 2024 - Achieving well-designed places

In addition: Development Plan:

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

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

The Local Plan: Part 1 - Strategic Policies (2012)
The Local Plan: Part 2 - Development Management Policies (2020)
The Local Plan: Part 2 - Site Allocations and Designations (2020)
The West London Waste Plan (2015)
The London Plan (2021)

Material Considerations:

The National Planning Policy Framework (NPPF) (2024) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

7. MAIN PLANNING ISSUES

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

Policy D3 of the London Plan (2021) states that development proposals should deliver appropriate outlook, privacy, and amenity.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all development will be required to be designed to the highest standards and incorporate principles of good design. It should also not have an adversary impact on the amenity, daylight and sunlight of adjacent properties and open space. The Council will aim to ensure that there is sufficient privacy for residents and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties or onto private open spaces. This is supported by Policy DMH 5 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) which requires HMOs to not have a detrimental impact upon the residential amenity of adjoining properties.

Paragraph 135 (f) of the NPPF (2024) states Planning policies and decisions should ensure that developments: create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

PROPOSED HMO USE

It should be noted that Hillingdon Council has now adopted an immediate Article 4 Direction to remove permitted development rights for the change of use of properties from Use Class C3 to Use Class C4.

The report presented to Council on 11 December 2025 states that the decision to adopt the immediate Article 4 Direction was made because:

"HMOs require proper management, as poor maintenance can result in unsuitable housing and harm to the amenity, affecting both residents and the wider neighbourhood. There are also concerns about how converting family homes into HMOs may change the character of communities and reduce the supply of appropriately sized homes for families. The impacts of these changes can include issues related to waste management, noise and disturbance, negatively impacting the area's appearance, and sometimes lead to anti-social behaviour. Reports to the council's Planning Enforcement and Private Sector Housing teams show growing community concerns about HMO conversions, as reflected in a previous motion at Full Council in July 2024. In response, the council commissioned research to better understand the scope and impact of HMOs in the area. This work is also being used to support the council's initiatives on additional and selective licensing schemes. The full evidence is presented in Appendix 2 of this report."

Whilst it is recognised that HMOs can provide an important form of accommodation for those who

may not have access to other forms of housing, the evidence underpinning the Council's Article 4 Direction demonstrates a significant increase in the conversion of single-family dwellinghouses into HMOs. It further identifies concerns regarding substandard living accommodation, over-intensive occupation, inadequate communal facilities and the consequent harm to residential amenity and the character of established residential areas.

The application proposes the change of use of the property from a lawful Class C3 single-family dwellinghouse to a Class C4 House in Multiple Occupation comprising five single-occupancy bedrooms served by three bathrooms. Whilst four of the bedrooms exceed 11.5sqm #9space standards) and could physically accommodate double occupancy, the applicant states that the property is intended to accommodate no more than five individuals. Although such occupancy could potentially be controlled by condition, officers have been made aware that an application for an HMO licence accommodating up to eight occupants has been submitted to the relevant licensing authority on behalf of the applicant and internal enforcement officers have also been investigating the fact that 6 persons have been residing on site. Furthermore, the property has been advertised on multiple occasions as an eight or even six bedroom HMO, a matter that has also been raised by a number of consultees during the consultation process.

This information raises significant concerns regarding the applicant's stated intention that the property is to operate as a five-bedroom HMO. Whilst planning applications must be determined on the basis of the development as submitted and cannot be refused solely on the basis of speculative future use, the evidence available calls into question the credibility of the proposal and the applicant's stated intentions.

In addition, officers from both the Planning and Enforcement teams have undertaken site visits between themselves. During these inspections, it was noted that the property has been completed, there are 6 persons that reside at the property and a number of rooms identified on the submitted plans as a study, living room and family room are empty and do not seem to function as communal spaces as described. Instead, the size and all other evidence outlined of these rooms give rise to concerns that they are capable of being used as additional sleeping accommodation, potentially resulting in further intensification of the occupation beyond that presented within the application. Officers are also concerned that some of these rooms could accommodate double occupancy, further increasing the number of residents at the property.

The proposed internal living arrangements also give rise to concerns regarding the quality of accommodation. The submitted plans indicate that only three bathrooms would be provided to serve the occupants. In the context of the concerns outlined above regarding the potential for increased occupancy, officers consider that the level of shared facilities is likely to result in poor living conditions for future occupiers and is indicative of an over-intensive form of development.

The proposed change of use represents a substantial intensification of the site's lawful use as a single-family dwellinghouse. The property has been extended and reconfigured to potentially accommodate a significantly greater number of unrelated adults living independently of one another. Unlike a single household, such occupants are likely to have differing work patterns, lifestyles and social arrangements, resulting in a materially greater level of activity within and around the property. This would reasonably be expected to generate increased comings and goings throughout the day and evening, greater use of the rear garden and communal areas, additional refuse generation, increased vehicle movements, and higher levels of noise and general disturbance.

The application site is located within a quiet residential area characterised predominantly by family housing. In this context, officers consider that the intensified pattern of occupation would be out of

keeping with the prevailing character of the area and would result in unacceptable harm to the living conditions of neighbouring occupiers through increased activity and disturbance.

A recent appeal relating to a proposed change of use to a Class C4 HMO in Hayes was considered by the Planning Inspector under appeal reference APP/R5510/W/25/3360554 (planning application reference (20650/APP/2024/1895). The Inspector concluded:

"The use of the building at number 5 Crossway as a House in Multiple Occupation would be very likely to amount to a more intensive use than use as a family dwellinghouse (or a dwelling occupied by not more than six residents living together as a single household), because of the potential numbers involved and the different movement patterns of people living independent lives. This more intensive use would be likely to generate greater levels of disturbance for neighbours and I am persuaded that the change for which planning permission is sought would amount to an over-intensification of development on the site that would also harm the character of the area."

Officers consider that the circumstances of the current proposal are comparable. The proposal would result in an over-intensive form of development, introducing a materially greater level of occupation and activity than would ordinarily arise from the lawful C3 use of the property. Having regard to the evidence before the Local Planning Authority, including the submitted HMO licence application, the marketing of the property as an eight-bedroom HMO, the findings of site inspections, the internal layout of the building and the absence of convincing evidence that a number of rooms would function as communal spaces, officers are not satisfied that the proposal would operate in the manner described by the applicant.

Accordingly, having regard to the development plan as a whole, the National Planning Policy Framework and all other material considerations, officers conclude that the proposal is unacceptable for the following reasons:

1. Harm to the character of the area

The proposed change of use would result in an over-intensive form of occupation within a quiet residential area characterised predominantly by family housing. The increased density and associated pattern of use would be out of keeping with the prevailing character of the area and would erode its established residential character.

2. Harm to residential amenity

The proposal would introduce a materially greater level of activity, comings and goings, refuse generation, vehicle movements and general disturbance arising from unrelated occupiers living independently. This would give rise to unacceptable harm to the amenities of neighbouring occupiers through increased noise and disturbance.

Taken together, the expected increase in noise, movement, and general disturbance would be materially harmful to residential amenity, The cumulative impact of these factors would be significantly detrimental to the living conditions of surrounding residents, conflicting with London Plan Policy D3 and Local Plan Policies DMHD 1, DMH 5 and DMHB 11, as well as NPPF paragraph 135(f), all of which require development to safeguard the living conditions of neighbouring residents. On balance, the limited benefit of providing additional HMO accommodation is outweighed by the identified harms. The proposal therefore conflicts with the objectives of the National Planning Policy Framework and the relevant policies of the Hillingdon Local Plan, which seek to safeguard residential amenity, secure a high standard of accommodation and protect the character of established residential areas. The application is therefore recommended for refusal.

7.2 Impact on Street Scene

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

distinctiveness.

Policy BE1 of the Hillingdon Local Plan: Part One Strategic Policies (2012) seeks a quality of design in all new development that enhances and contributes to the area in terms of form, scale and materials; is appropriate to the identity and context of the townscape; and would improve the quality of the public realm and respect local character.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that new development must be designed to the highest standards and incorporate principles of good design including:
i) harmonising with the local context by taking into account the surrounding: · scale of development, considering the height, mass and bulk of adjacent structures; · building plot sizes and widths, plot coverage and established street patterns; · building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure; architectural composition and quality of detailing; local topography, views both from and to the site; and impact on neighbouring open spaces and their environment.
ii) ensuring the use of high quality building materials and finishes;
iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

Policy DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that development should be well integrated with the surrounding area.

The application does not seek permission for extensions or external alterations to the existing dwelling. The secure cycle storage is shown to be located in the front garden and would not result in a harmful visual impact given its location and setting. As such the proposal complies with the overarching aims of Policies D3 and D4 of the London Plan (2021), Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012), and DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

PROPOSED HMO USE

It should be noted that Hillingdon Council has now adopted an immediate Article 4 Direction to remove permitted development rights to convert properties from C3 to C4. The report made to Full Council states that the decision to adopt an immediate Article 4 Direction is because, "HMOs require proper management, as poor maintenance can result in unsuitable housing and harm to the amenity, affecting both residents and the wider neighbourhood. There are also concerns about how converting family homes into HMOs may change the character of communities and reduce the supply of appropriately sized homes for families. The impacts of these changes can include issues related to waste management, noise and disturbance, negatively impacting the area's appearance, and sometimes lead to anti-social behaviour. Reports to the council's Planning Enforcement and Private Sector Housing teams show growing community concerns about HMO conversions, as reflected in a previous motion at Full Council in July 2024. In response, the council commissioned research to better understand the scope and impact of HMOs in the area. This work is also being used to support the council's initiatives on additional and selective licensing schemes. The full evidence is presented in Appendix 2 of this report."

Whilst it is noted that HMO's can provide access to a form of residential accommodation to targeted

occupants who do not have access to funds for other forms of residential accommodation. However it is clear from the evidence which formed the report to full council for the adoption of borough-wide Article 4 Direction to remove permitted development rights for C3 to C4 conversion that there is a considerable rise in the number of properties being converted from single family dwellinghouses to HMO's with substandard levels of living accommodation. This demonstrates in an over intensification of which there are significant recognises and evidenced harm.

Furthermore, it should be highlighted that with the above Article 4 Direction in place, the fallback position to convert C3 single family dwelling to C4 HMO is no longer valid for the application site and other similar properties. Therefore, the applicant must demonstrate that the proposal would have no unacceptable harms to the neighbouring amenity and all other relevant aspects.

. The application proposes the change of use of the property from a lawful C3 single family dwellinghouse to a C4 small HMO comprising five single-occupancy bedrooms. Although three of the proposed HMO bedrooms meet or exceed 11.5sqm and could feasibly accommodate double occupancy, the applicant states that the HMO is intended for five individuals only. This level of occupancy could be controlled by condition if an otherwise acceptable scheme were identified.

Whilst the proposed HMO would lead to a moderate increase in total occupancy in the host building compared to the existing single family dwelling use, the change of use, however, represents a substantial intensification of the original single family dwelling, with the property extended and reconfigured to accommodate a significantly higher number of unrelated adults.

The proposed intensification is expected to materially increase comings and goings, activity levels, noise, and general disturbance when compared with the property's existing C3 use. The property lies within a quiet residential area largely characterised by family housing, where patterns of occupation tend to be lower-intensity and more predictable.

A recent appeal for change of use from C3 to C4 HMO in Hayes was considered by Planning Inspectorate under appeal reference APP/R5510/W/25/3360554 in respect of planning application reference 20650/APP/2024/1895 (5 Crossway, Hayes, Hillingdon UB3 3JG) for change of use from single dwelling (C3) to Class (C4) 6-bed HMO. The Inspector advised that:

"The use of the building at number 5 Crossway as a House in Multiple Occupation would be very likely to amount to a more intensive use than use as a family dwellinghouse (or a dwelling occupied by not more than six residents living together as a single household), because of the potential numbers involved and the different movement patterns of people living independent lives. This more intensive use would be likely to generate greater levels of disturbance for neighbours and I am persuaded that the change for which planning permission is sought would amount to an over-intensification of development on the site that would also harm the character of the area."

Two other recent appeals for change of use from C3 to C4 HMO in Perivale, Ealing were considered by Planning Inspectorate under appeal reference APP/A5270/W/25/3372906 in respect of planning application reference 251431FUL (120 Rydal Crescent, Ealing, Perivale UB6 8EQ) and APP/A5270/W/25/3372907 in respect of planning application reference 251432FUL (97 Rydal Crescent, Ealing, Perivale UB6 8DZ) for change of use from a dwellinghouse (Class C3 use) to a six room/six-person small house in multiple occupation (Class C4 use). Although these two appeal sites are not located with Hillingdon borough, they share similarity with the application site in terms of planning context as they are both located within a residential neighbourhood with Article 4 Direction to remove the Permitted Development rights for C4 HMO. In both appeals, the Inspector advised that:

"The development involves the conversion of the property to a six-person HMO. Each Occupant will attract their own visitors and also have their own deliveries and are more likely to carry out individual activities while at home across a wider range of times. As such, the intensity of use of the appeal property as a HMO, inclusive of the number of comings and goings, is such that it is out of character with the existing nature of the area which is primarily comprised of single-family homes. The low number of surrounding HMO's further exacerbates the development's discordance with the lower intensity character of the area. Furthermore, the occupiers of HMO's can be of a transient nature, eroding the existing community cohesion of single-family dwellings."

In the case of the application property, the original dwelling was a single family dwelling located within a quiet residential neighbourhood characterised by single family dwellings with a low concentration of HMO. It is considered that as a C3 dwellinghouse, the application property would contribute to the character of the area.

The use of the property by five unrelated individuals as an HMO, as opposed to a single collective household would result in a significant increase in noise and general disturbance to neighbouring residents, particularly as a result of a marked increase in comings and goings, use of the rear garden and the lack of information relating to sound insulation. The site lies within a relatively quiet residential area characterised by single-family dwellings with lower intensity than HMOs. The proposal would be out-of-character in the surrounding area, and would result in a significant intensification in the number of households on the site and the marked increase in activity which would be of significant detriment to the amenity of surrounding residents.

The cumulative impact of these factors would be significantly detrimental to the living conditions of surrounding residents, conflicting with London Plan Policy D3, Hillingdon Policies DMHD 1, DMH 5 and DMHB 11, and NPPF Paragraph 135(f), all of which require development to safeguard the amenity of neighbouring occupiers.

The applicant has submitted a HMO Management Plan intended to demonstrate how operational measures would maintain the property in good condition. The measures included in the HMO Management Plan are positive in principle and reflect good practice within the context of HMO licensing. However, they only relate to property maintenance and do not overcome the inherent planning impacts arising from the intensification of the site or the nature of HMO occupation, e.g. increased movements, noise and disturbance, increased garden use and lack of enhanced sound insulation.

7.3 Traffic Impact/Pedestrian Safety

Paragraph 116 of the NPPF (2024) states - 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.

Paragraph 117c) of the NPPF (2024) continues by stating -. Within this context, applications for development should: create places that are safe, secure and attractive - which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.

Policy T2 Part A of the London Plan (2021) states - Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.

Policy T4 Parts E and F of the London Plan (2021) states - E) The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as

well as associated effects on public health, should be taken into account and mitigated; and, F) Development proposals should not increase road danger.

London Plan (2021): Policy T6.1 (Residential Parking) requires that new residential development should not exceed the maximum parking standards as set out in Table 10.3.

Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) 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.

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

Policy DMT 6 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) seeks to ensure that all development is in accordance with the car parking standards set out in Appendix C, Table 1 unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.

The site exhibits a Public Transport Accessibility Level (PTAL) of 1a which is considered as 'very poor' and as such heightens dependency on the use of private motor transport to and from the address.

It is proposed to convert the existing 6-bedroom detached dwelling to an HMO (C4) accommodating 5-bedrooms suggesting an occupancy level of up to 5 persons. The existing property exhibits 3 established 'side by side' car parking spaces on the frontage served by a generously wide carriageway crossing which are to remain for the purposes of this application.

Hillingdon Local Plan: Part 2 Policy - DMT 6 requires that new development will only be permitted where it accords with the council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network. There is no regional standard that can be applied.

The local standard for an HMO use with up to 6 occupants requires a maximum of "1 parking space per 2 occupants". On this premise, 2-3 on-plot spaces would be required for an occupancy level of 5 persons hence the standard is met in this case. It is also noted that the established cc allows for each space to operate independently which is considered a prerequisite.

On this basis, there are no sustainable grounds for objection related to the level of on-plot parking provision.

Electric Vehicle Charging Points (EVCP's)

In line with the London Plan (2021), within the final parking quantum there is a requirement for a minimum 20% 'active' EVCP provision with all remaining spaces being designated as 'passive' provisions. It is recommended that 1 'active' & 2''passive' spaces are provided to future proof for potential demand. The applicant has not acknowledged this aspect; hence a suitable planning condition should be applied.

Cycle Parking

In terms of cycle parking there would be a requirement of 1 secure and accessible space per occupant equating to 5 spaces. A suitable store for 6 cycles positioned on the site frontage is therefore considered appropriate.

Operational Refuse Requirements

Bin storage arrangements should be provided within 10 m of the highway boundary. This arrangement would then comply with the adopted waste collection distance parameters. An area for refuse is to be dedicated on the house frontage which indicates conformity. There are no further observations.

Conclusion

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety related concerns, in accordance with Local Plan: Part 2 Development Management Plan (2020) - Policies DMT 1, DMT 2 & DMT 6 and Policies T4, T5 and T6 of the London Plan (2021).

7.4 Carparking & Layout

See 'Traffic Impact/Pedestrian Safety' section.

7.5 Urban Design, Access and Security Considerations

LIVING CONDITIONS FOR FUTURE OCCUPIERS:

INTERNAL AMENITY SPACE:

Paragraph 135f) of the National Planning Policy Framework (2024) states - Planning policies and decisions should ensure that developments: create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

Policy DMH 5 of the Hillingdon Local Plan - Part 2: Development Management Policies (2020) allows large HMOs only where there are satisfactory living conditions for occupiers.

Policy D6 of the London Plan (2021) and Policies DMHB 11 and DMHB 16 of the Hillingdon Local Plan - Part 2: Development Management Policies (2020) require a high standard of design with minimum internal space standards.

Policy D3 of the London Plan (2021) states that developments deliver appropriate outlook, privacy and amenity and achieve indoor and outdoor environments that are comfortable and inviting for people to use.

Policy D6 of the London Plan (2021) states that housing development should be of high quality design and provide adequately sized rooms. Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. Qualitative aspects of a development are key to ensuring successful sustainable housing. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.

Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment.

The proposal comprises a 5-bedroom HMO with a shared communal kitchen, living room, family room and study. There are no bedrooms with a private ensuite but there is a bathroom on each floor and the internal room sizes are as follows:

- Bedroom 1 (ground floor) measures approx. 12.0 sqm, - 1 person
- Bedroom 2 (first floor) measures approx. 13.76 sqm, - 1 person
- Bedroom 3 (first floor) measures approx. 11.48 sqm, - 1 person
- Bedroom 4 measures approx. 9.39 sqm, - 1 person and
- Bedroom 5 measures approx. 12.21 sqm. - 1 person

OTHER SPACE:
Living room 9.41 sqm
Family room 11.75sqm
kitchen 13.32sqm
Study 6.09m2

It is noted by officers that some of the rooms can accommodate double occupancy, which is a concern outlined above. Nonetheless, all habitable rooms would enjoy a satisfactory level of light and outlook in accordance with Policy DMHB 11 and DMH5 of the Hillingdon Local Plan: Part Two - Development Management Policies and Policy D6 of the London Plan (2021).

EXTERNAL AMENITY SPACE:

Whilst DMHB 18 does not set a specific standard for HMOs, it remains necessary to demonstrate that adequate external amenity can be provided to meet the needs of five independent adult occupiers.

Whilst there is no prescribed standard for HMOs in Policy DMHB18, the proposed development would retain approximately 79.2qm of rear garden area. The rear garden would be accessible via the communal kitchen on G/F and there is also a public space to the front of the property therefore there are no concerns raised with regards to this element,

WASTE AND RECYCLING:

Full details of the design and the dimensions of the fenced bin stores can be secured by way of condition should the application be recommended for approval.

7.6 Other Issues

PRINCIPLE OF DEVELOPMENT

The Council adopted the Borough Wide Article 4 Direction on 12 December 2025 removing permitted development rights under Article 3, Schedule 2, Part 3, Class L.

The development site is currently in C3 use. The change of use from C3 to C4 therefore requires planning permission within the aforementioned Article 4 Direction in place.

Its conversion to a small HMO (C4 use) would be acceptable in principle subject to compliance with other relevant material considerations and policies.

Policy DMH 1 states:

The net loss of existing self-contained housing, including affordable housing, will be resisted unless the housing is replaced with at least equivalent residential floorspace. B) The Council will grant planning permission for the subdivision of dwellings only if: i) car parking standards can be met within the curtilage of the site without being detrimental to the street scene; ii) all units are self contained with exclusive use of sanitary and kitchen facilities and provided with individual entrances and internal staircases to serve units above ground floor level; iii) adequate amenity space is provided for the benefit of residents; and iv) adequate living space standards are met.

Paragraph 4.3 of the Local Plan provides guidance for the implementation of Policy DMH1 and states 'In order to meet projected housing needs, the Council aims to resist the loss of residential accommodation within the Borough by means of Policy DMH 1: Safeguarding Existing Housing. For the purposes of this policy, residential accommodation includes Houses in Multiple Occupation (HMOs), student accommodation and other uses falling into Use Classes C3 and C4.'

Policy DMH 1 seeks to protect buildings in C3 and C4 use. As the building (subject of this application) would be going from C3 to C4 use there would be no loss of identified residential accommodation/housing stock.

Policy DMH 5 states:

B) In wards covered by an Article 4 Direction for HMOs Planning applications for the change of use from dwelling house (Use Class C3) to HMO (Use Class C4 and Sui Generis) will only be permitted:

i) where it is in a neighbourhood area where less than 20% of properties are or would be exempt from paying council tax (or in the case of Conservation Areas 10%) because they are entirely occupied by full time students, recorded on the Council's database as a licensed HMO, benefit from C4/Sui Generis HMO planning consent and are known to the Council to be HMOs;
ii) in Conservation Areas where less than 10% of properties are exempt from paying council tax because they are entirely occupied by full time students, recorded on the Council's database as a licensed HMO, benefit from C4/Sui Generis HMO planning consent and are known to the Council to be HMOs and the change of use does not form a consecutive HMO use in a street frontage;
iii) where less than 15% of properties within 100 metres of a street length either side of an application property are exempt from paying council tax because they are entirely occupied by full time students, recorded on the Council's database as a licensed HMO, benefit from C4/Sui Generis HMO planning consent and are known to the Council to be 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 will not have a detrimental impact upon the residential amenity of adjoining properties.

A review of the Council's HMO Register has identified that there are no other registered HMO's on Brackenbridge Drive. As such, the proposal would not therefore result in a concentration of properties falling under an HMO use as defined under Policy DMH 5. However, for the reasons discussed in the sections of the report above, the HMO will have a detrimental impact upon the residential amenity of adjoining properties and is therefore not supported as it does not align with Policy DMH 5 point iv.

8. Reference Documents

Hillingdon Local Plan: Part 1 - Strategic Policies (2012)
Hillingdon Local Plan: Part 2 - Development Management Policies (2020)
London Plan (2021)
National Planning Policy Framework (2024)

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