

Planning Statement

Change of use from C3 to a large House in Multiple Occupation (Sui Generis) — 7-bedroom, 7-person HMO.

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 **large House in Multiple Occupation (Sui Generis)** to operate as a **7-bedroom, 7-person HMO**.

1.2. Because the proposed occupancy exceeds six unrelated residents, the use falls outside Use Class C4 (small HMO, 3–6 persons) and is properly classified as **Sui Generis**. The application is assessed on its planning merits accordingly; it does not rely on any permitted-development fallback.

1.3. 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 and loss of a dwelling, HMO concentration, living conditions for occupiers (including communal amenity), 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.

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. 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, 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 (walking distances/times 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) — route 282 (every 10–13 minutes) — 0.2 miles (5 min walk)

- Malvern Avenue (Stop S) — route 282 (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 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 predominantly residential context with access to local services and public transport options, albeit within a low-PTAL area, and in close proximity to significant employment/retail at Victoria Retail Park.

3. Proposal

3.1. The application seeks **planning permission for a change of use from a single dwellinghouse (Use Class C3) to a large House in Multiple Occupation (Sui Generis)**, to operate as a **7-bedroom, 7-person HMO**. The proposed occupancy is **seven residents (one person per bedroom)**, with the accommodation arranged across the existing three-storey property.

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 two former ground-floor reception rooms (the living room and the family room) are re-purposed as bedrooms, and the day-to-day communal function is consolidated into the **ground-floor kitchen/dining area**.

3.3. The proposed HMO accommodation comprises **seven single bedrooms**, each served by natural light/ventilation via an external window as shown on the submitted plans (drawing A03, to be read as revised for seven bedrooms):

Room	Floor	Approx. area	Notes
Bedroom 1	Ground	12.0 sqm	Ceiling height 2.40 m
Bedroom 2	Ground (former living room)	9.41 sqm	New bedroom
Bedroom 3	Ground (former family room)	11.75 sqm	New bedroom
Bedroom 4	First	13.76 sqm	Ceiling height 2.30 m
Bedroom 5	First	11.48 sqm	Ceiling height 2.30 m
Bedroom 6	Second	9.39 sqm	Ceiling height 2.20 m
Bedroom 7	Second	12.21 sqm	Ceiling height 2.20 m

3.4. Every bedroom exceeds the **mandatory minimum HMO room size of 6.51 sqm** for single adult occupation. The two smallest rooms (Bedrooms 2 and 6, at 9.41 sqm and 9.39 sqm) remain comfortably above that mandatory floor, and the balance of rooms provides a range of larger sizes.

3.5. **Communal and support space.** Following the conversion of the two reception rooms, shared living/dining is provided by the **ground-floor kitchen/dining area (kitchen approx. 13.32 sqm plus the adjoining dining area)**. A **first-floor study of approximately 6.09 sqm** is retained as a non-habitable study/storage room (it is below the 6.51 sqm threshold and is not counted or used as a bedroom). Sanitary facilities are provided across the three floors (a ground-floor WC/bathroom, a first-floor bathroom and a second-floor bathroom).

3.6. **Parking and cycle provision.** Car parking arrangements are retained as existing, providing **three off-street spaces** within the front garden/hardstanding, which helps minimise the risk of overspill parking on surrounding streets in this low-PTAL location. Secure, covered cycle storage is provided within the front garden and is **increased to seven cycle spaces** (one per bedroom) to reflect the larger occupancy and support sustainable travel.

3.7. For clarity, the core components of the proposal are:

- Change of use **C3 → Sui Generis** for a **7-person large HMO** (seven residents).
- **Seven let bedrooms** (Bedrooms 1–7), with a retained non-habitable study (6.09 sqm).
- Communal provision consolidated into the **ground-floor kitchen/dining area**.
- **No material external alterations** to the building; the scheme is focused on use and internal arrangement.
- Retention of **three off-street parking spaces**.
- Provision of **secure cycle storage for seven bicycles** within the front garden.

4. Principles of Development

4.1. Principle of use, housing mix and loss of a dwelling

4.1.1. The proposal is a **large HMO (Sui Generis)** for seven people. It is assessed on its own planning merits. Unlike a C4 small HMO, a Sui Generis HMO does not benefit from permitted-development rights to revert to C3; any future reversion to family use would itself require planning permission. The applicant recognises this and does not advance a “fallback to C3” argument.

4.1.2. It is acknowledged candidly that the proposal engages the Council’s concern about the **loss of a family-sized dwelling** and the intensification associated with converting reception rooms to bedrooms. 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**. The present scheme is distinguishable in degree — it is a **smaller (7-person) HMO**, it involves **no external alterations**, and it **retains the building’s three-storey form and its ready capacity to be returned to family use** — but the applicant accepts that this remains a **finely balanced** housing-mix judgement rather than a straightforward C4 change.

4.1.3. Weighing in favour of the proposal, the scheme responds to a **clear and evidenced local need** for managed, single-room shared accommodation close to substantial employment at Victoria Retail Park and the wider South Ruislip area, and it does so **without generating an unacceptable concentration of HMOs** (section 4.2) and **with enforceable management controls** (section 4.4 and the accompanying HMO Management Plan). The building’s external appearance and contribution to the streetscene are unchanged.

4.1.4. 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 offered as a controlled, well-managed HMO with clear mitigation and enforceable limits.

4.2. HMO policy compliance and concentration

4.2.1. The HMO considerations that the Council repeatedly focuses on are **location suitability, living standards, neighbour impacts, and overconcentration**. The concentration position is addressed directly below; living standards and neighbour impacts are addressed in sections 4.3–4.4.

4.2.2. Although the site is in a low-PTAL area, there are many amenities within reasonable walking distance, as set out in section 2. Tenants would be able to access shops and medical facilities on foot, and the site is within a 14-minute walk of Victoria Retail Park and within 10 minutes of grocery stores.

4.2.3. A **100m-radius HMO concentration check** has been undertaken to address the Council’s overconcentration test. The same “counted” categories referenced by the Council have been used (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 evidence where applicable).

4.2.4. The review was 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. The wider search identified the following HMOs in the Ruislip area:

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

4.2.5. The results indicate that there is **1 licensed HMO (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.

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 in this respect.

4.2.7. The low number of HMOs locally also indicates **very limited provision of formally managed, single-room 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 people. In that context, a well-managed seven-person HMO would contribute a modest quantum of more affordable, flexible single-room accommodation without creating an overconcentration issue.

4.3. Living conditions for future occupiers

4.3.1. All seven bedrooms exceed the mandatory minimum room size (6.51 sqm) and are served by natural light and ventilation. The accommodation is distributed across three floors, avoiding a single-floor "bed-packed" arrangement.

4.3.2. **Communal amenity is the principal living-standards consideration for this scheme.** With the two reception rooms converted, day-to-day shared living is consolidated into the ground-floor **kitchen/dining area**, supplemented by the retained study and the private rear garden. The applicant will ensure the kitchen/dining area and its facilities (cooking appliances, sinks, worktop and refrigeration) are sized and equipped for seven sharing occupiers, so that the communal offer remains functional and compliant with the Council's HMO amenity standards. Where the Council considers additional dedicated communal living space is necessary for a seven-person HMO, the applicant is willing to address this by condition or minor design amendment (see section 4.7).

4.3.3. The good spread of room sizes, the retained outdoor amenity, and the enforceable management regime together support acceptable living conditions for occupiers at the proposed intensity.

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 addressed through the scheme's management controls rather than relying on room sizes alone.

4.4.2. The internal arrangement and a robust **HMO Management Plan** (submitted with this application) cover quiet hours, visitor expectations, refuse presentation, and a clear complaints/rapid-response contact — the practical mitigation appropriate to address neighbour amenity concerns.

4.4.3. The Bridgwater Road case provides useful comparator evidence on this specific issue: **even at eight occupants**, officers concluded that neighbour amenity impacts from the use would **not be significant**, and the report recorded **no objection** overall in respect of neighbour amenity. The present proposal is of lower intensity than that scheme and incorporates 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 **private rear garden of approximately 75 sqm**, which is appropriate to the level of occupation and provides usable shared outdoor amenity. The scheme does not involve harmful loss of usable private amenity space.

4.6. Highways, parking and sustainable travel

4.6.1. Transport impacts are scrutinised more closely where PTAL is low. The proposal retains **three off-street parking spaces** within the front garden/hardstanding. It is acknowledged that, for a seven-person HMO, this is **below a strict "one space per two occupants" expectation (which would indicate four spaces)**; however, the retained on-site provision still materially reduces the risk of overspill parking compared with a nil-provision scheme, and the shortfall is mitigated by (i) the site's proximity to frequent bus services (route 282, every 10–13 minutes, 5-minute walk), (ii) walkable access to shops, employment and medical services, and (iii) enforceable **car-capping management** whereby tenancies allocate the three spaces and specify no-car status once spaces are fully allocated.

4.6.2. The Bridgwater Road decision is again useful comparator evidence: despite that 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 emphasised that refusal on transport grounds would only be justified where impacts are severe. Here the baseline position is more favourable because the scheme provides **three off-street spaces**.

4.6.3. To strengthen sustainable-travel credentials, the proposal provides a **secure cycle store for seven bicycles** within the front garden, sized at one space per bedroom in line with London Plan long-stay cycle standards. 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 is a **seven-person large HMO (Sui Generis)** that makes efficient use of a large, three-storey property to provide managed shared accommodation in a location with limited HMO provision and close access to employment. It performs well on **HMO concentration** (only one HMO within the 100m catchment), retains **meaningful on-site parking and cycle provision**, and is supported by an **enforceable HMO Management Plan**.

4.7.2. The principal areas of sensitivity are honestly identified as: (i) the **change from a family dwelling to a large Sui Generis HMO**, engaging housing-mix and loss-of-dwelling policy; and (ii) the **communal amenity** provision following conversion of the reception rooms. The applicant does not seek to understate these. On (i), the scheme is distinguishable from the refused Bridgwater Road scheme in scale and in the absence of external change, and it delivers clear housing-need and low-concentration benefits. On (ii), the applicant is content to secure adequate communal/kitchen-dining provision — and, if the Council requires it, a dedicated communal living room — through condition or minor amendment.

4.7.3. Against these considerations, the proposal delivers a small quantum of lower-cost, flexible single-room accommodation that meets a distinct local need, without creating an overconcentration issue or generating unacceptable neighbour impacts, and without harmful external alterations.

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 — including an occupancy cap of seven persons, securing the communal-amenity and cycle provision, and requiring adherence to the HMO Management Plan.

5. Conclusion

5.1. The application seeks permission for a **well-managed, seven-person large HMO (Sui Generis)** at 70 Brackenbridge Drive, supported by retained private amenity space, on-site parking and cycle provision, and a comprehensive management regime.

5.2. The planning assessment demonstrates that the proposal would **not** result in an unacceptable concentration of HMOs and, through the combination of layout and enforceable controls, would not give rise to undue impacts on neighbour amenity or the operation of the local highway network. The two finely balanced considerations — loss of a family dwelling and communal amenity provision — are addressed candidly above and are capable of being controlled by condition or minor amendment.

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 occupancy cap, communal-amenity and cycle provision, and management arrangements.