

PLANNING JUSTIFICATION

Proposed 4-Bedroom Class C4 HMO with Shared Communal Lounge

8 Paget Road, Uxbridge

Hillingdon Council

Pre-Application Reference: 79552/PRC/2026/102

Purpose of this statement This Planning Justification has been prepared to accompany a revised planning application for the change of use of the existing Class C3 dwelling at 8 Paget Road, Uxbridge to a small Class C4 House in Multiple Occupation. It responds directly to the matters raised by Hillingdon Council in the pre-application report dated 14 August 2026 and assesses the materially revised scheme now proposed.

1. Revised Proposal

The revised proposal is deliberately lower in intensity and provides a substantially improved internal arrangement compared with the scheme assessed at pre-application stage. The earlier scheme was assessed as a five-bedroom HMO with the potential for up to six occupiers and no dedicated shared lounge. The revised proposal reduces the accommodation to four bedrooms and introduces a dedicated 10m² shared communal lounge.

The revised accommodation schedule is as follows:

Room	Area	Planning consideration
Bedroom 1	12m ²	Good-sized single bedroom
Bedroom 2	11m ²	Good-sized single bedroom
Bedroom 3	9m ²	Reasonable single bedroom
Bedroom 4	7m ²	Smallest bedroom; assessed carefully below
Shared communal lounge	10m ²	Dedicated internal communal living space
Shared kitchen	9m ²	Shared kitchen provision
Rear garden	25m ²	Shared external amenity space

2. Site and Planning Context

The property is an existing two-storey end-of-terrace dwelling in a predominantly residential area. The pre-application report records that the property has off-street parking, a private rear garden and a PTAL of 2. The Council's Borough-wide Article 4 Direction was adopted on 12 December 2025 and removes permitted development rights for C3 to C4 changes of use; consequently, planning permission is required. The pre-application report nevertheless confirms that the change to a small HMO is acceptable in principle, subject to the relevant planning considerations and policies.

The proposal therefore turns principally on whether the identified policy conflict associated with the loss of a family-sized C3 dwelling is outweighed by the overall planning merits of the revised, lower-intensity HMO and whether the revised scheme satisfactorily addresses the concerns relating to residential amenity, future occupier amenity, parking, waste and management.

3. Response to Policy DMH 1 – Safeguarding Existing Housing

The applicant acknowledges that Policy DMH 1 seeks to resist the net loss of existing self-contained housing unless equivalent residential floorspace is provided. The pre-application officer considered that conversion of the existing three-bedroom dwelling to C4 would conflict with DMH 1 because a C4 HMO is not self-contained housing in the same sense as a single C3 household dwelling.

The applicant does not seek to argue that this policy issue does not exist. Rather, the issue should be afforded appropriate weight in the planning balance having regard to the actual characteristics of the revised proposal.

First, the proposal does not involve the loss of the building from residential use. The property remains residential accommodation and continues to provide four bedrooms, a shared kitchen, a dedicated 10m² communal lounge and external amenity space. The proposal therefore changes the form and pattern of residential occupation rather than replacing a dwelling with a non-residential use.

Second, the revised scheme is materially different from the five-bedroom arrangement considered at pre-application stage. The reduction in bedrooms and introduction of a proper communal living room reduce the intensity and improve the quality of the accommodation. This is important when determining the actual planning harm rather than treating the earlier scheme as representative of the revised proposal.

Third, the existing dwelling is being retained as a residential building and the proposal makes more efficient use of an existing urban property without requiring a new dwelling to be constructed elsewhere. The proposal should therefore be assessed as a change in the type of residential accommodation available within the existing housing stock.

4. Response to DMH 2 and London Plan Policy H10 – Housing Mix

The pre-application report identifies a substantial borough-wide need for larger affordable and private market housing, particularly three-bedroom properties, and consequently identifies a conflict with DMH 2 and London Plan Policy H10.

The applicant recognises the importance placed by the Development Plan on retaining family-sized accommodation. However, the assessment must also consider the complete range of housing needs and the specific nature of the proposed accommodation.

The proposal would provide four bedrooms within a managed shared residential arrangement. It therefore provides a form of housing capable of meeting the needs of people who require accommodation in a shared environment but who do not form a conventional family household. The four-bedroom arrangement is also materially less intensive than the five-bedroom scheme considered by the Council.

The policy conflict should therefore be recognised, but it should not be treated as determinative in isolation. The relevant question is whether the identified loss of family housing gives rise to harm of sufficient weight to outweigh the benefits of the revised proposal when all material considerations are considered together.

5. Five-Year Housing Land Supply and NPPF Paragraph 11(d)

The Council's pre-application report expressly confirms that its latest monitoring position at the time of the report indicated that it could no longer demonstrate a five-year housing land supply and that paragraph 11(d) of the NPPF was engaged. The Council's monitoring page also confirms that its latest five-year housing supply document was published in April 2026.

The applicant recognises that the weight to be given to this matter must be determined by the decision maker and that the housing land supply position does not automatically require permission to be granted. However, where the presumption in favour of sustainable development is engaged, the decision maker must undertake the relevant tilted balance and assess whether the adverse impacts of the proposal significantly and demonstrably outweigh the benefits.

The applicant accepts that the Council may place less weight on a conversion of an existing dwelling than on the creation of an entirely new dwelling because the property is already within the housing stock. Nevertheless, the revised proposal provides a form of residential accommodation for multiple occupiers and makes more efficient use of an existing residential building. Its contribution should therefore not be regarded as nil.

The housing benefit is strengthened by the revised design because the scheme is no longer seeking to maximise bedroom numbers. Instead, it provides four bedrooms and a 10m² communal lounge, resulting in a more balanced form of shared accommodation.

6. Appeal Decisions Referred to in the Pre-Application Report

The pre-application report refers to a number of appeal decisions, including 11 Maygoods View (Appeal Ref. 6005866), 5 Crossway (APP/R5510/W/25/3360554), 14 Willow Tree Lane (6004329), 21 Green Lane, Uxbridge (6008246), and appeal reference 6002695.

The applicant accepts the general proposition arising from those decisions that an HMO can create a materially different pattern of activity from a single family household and that the conversion of a family dwelling can therefore give rise to planning harm. However, each appeal must be considered on its own facts, including the number of bedrooms and occupants, the internal layout, communal facilities, garden arrangements and evidence concerning neighbouring amenity.

The revised scheme is materially distinguishable from the arrangement assessed in the pre-application report. The earlier proposal was described as a five-bedroom HMO and was assessed as potentially accommodating up to six people. The officer specifically identified the absence of a shared lounge as a reason why occupants would be likely to eat, study, relax and undertake recreational activities within their bedrooms or use the garden more intensively.

That factual basis has now been changed. The revised proposal has four bedrooms and a dedicated 10m² communal lounge. The planning assessment should therefore consider the reduced number of bedrooms and the availability of an internal communal facility when assessing the likelihood and degree of intensification.

7. Residential Amenity and Intensification

Residential amenity was one of the principal concerns raised by the Council. The pre-application report considered that a five-bedroom arrangement with potentially six occupiers could generate increased comings and goings, visitor activity, noise and disturbance.

The revised scheme provides a meaningful response to that concern. Reducing the number of bedrooms from five to four reduces the maximum residential intensity associated with the accommodation. More importantly, the inclusion of a dedicated communal lounge provides an appropriate internal space in which occupants can meet and socialise.

The communal lounge is particularly relevant because the officer previously considered that the absence of shared living space would increase reliance upon bedrooms and the rear garden. The revised arrangement removes that fundamental weakness.

A suitable HMO Management Plan should accompany the application and should include clear measures for resident conduct, noise, waste, visitors, maintenance, emergency contacts and complaint handling. The management arrangements should be capable of being secured by an appropriate planning condition if considered necessary.

Subject to those controls, the revised proposal should not be assumed to generate unacceptable disturbance merely because occupation is by unrelated individuals. The material consideration is the likely level of activity generated by this specific four-bedroom arrangement, rather than the worst-case activity associated with the superseded five-bedroom scheme.

8. Internal Amenity for Future Occupiers

The pre-application officer identified the previous 7m² bedroom as cramped, the 9m² kitchen as unable to accommodate communal dining/seating and the absence of a shared lounge as significant shortcomings.

The revised layout responds directly to those concerns. The bedrooms are now 12m², 11m², 9m² and 7m², while a separate 10m² communal lounge is provided. Three of the four bedrooms are therefore 9m² or larger and the accommodation is supplemented by a dedicated communal living room.

The 7m² bedroom remains the smallest room and should be clearly identified as such. The planning merits do not depend upon describing this room as equivalent to the larger bedrooms. Instead, the overall layout provides a reasonable range of private sleeping accommodation alongside a dedicated shared living environment.

The 9m² kitchen should be assessed as a kitchen serving four bedrooms rather than being expected to perform simultaneously as the principal communal living space. The introduction of the 10m² lounge is therefore a substantive improvement: residents have a separate space for sitting, socialising and other day-to-day communal activities.

The final application should include accurate dimensions, floor areas, window positions and furniture layouts so that the Council can assess functionality and outlook on the basis of the actual revised plan.

9. Bedroom 4 and Outlook

The pre-application report raised concern about the outlook from a bedroom served by a window facing a neighbouring brick wall. The revised scheme places the 7m² fourth bedroom at first-floor level. The application drawings should clearly demonstrate the window arrangement, outlook and relationship to neighbouring buildings.

The smaller bedroom should not be presented as the principal communal space. The presence of the separate 10m² lounge is important because it means the resident has access to an alternative shared living environment rather than being confined to the bedroom for sitting and recreation.

10. External Amenity Space – 25m² Garden

The Council's pre-application report identifies a 25m² rear garden as a constraint. It notes that the normal private amenity standard for a four-or-more-bedroom house is 100m² under Policy DMHB 18, while also acknowledging that the policy does not prescribe a specific private amenity standard for HMOs.

The applicant accepts that the garden is relatively small and does not seek to argue that 25m² is equivalent to the 100m² standard. Instead, the proposal should be assessed on the totality of amenity provision.

The revised proposal provides 10m² of internal communal lounge space in addition to the 25m² rear garden. This is a material change from the previous scheme and directly addresses the officer's concern that the absence of communal living space would increase reliance upon the garden for socialising.

The garden would consequently operate as supplementary external amenity space rather than the sole location in which residents can gather away from their bedrooms. The reduced number of bedrooms also reduces the likely intensity of use of the garden compared with the earlier five-bedroom arrangement.

A landscaping and management plan should ensure that the garden remains useable, maintained and appropriately managed, with reasonable controls on late-evening noise and visitor activity.

11. HMO Concentration and Policy DMH 5

The pre-application report requires evidence that the proposal would not create an overconcentration of HMOs and confirms that this can be investigated using the Council's HMO Register, council tax information and planning records.

The formal application should therefore include an up-to-date HMO concentration assessment addressing the relevant thresholds in Policy DMH 5. This should be prepared using the Council's latest available records at the date of submission.

The proposal should also demonstrate compliance with the remaining DMH 5 requirements, including parking, waste storage, retention of amenity space and the protection of neighbouring residential amenity.

12. Parking, Highways and Sustainable Travel

The pre-application report records that the property has existing off-street parking and is within a PTAL 2 area. It also notes that Policy DMT 6 permits up to three parking spaces for an HMO accommodating up to six occupiers.

The previous submission did not provide sufficient evidence of the parking arrangement, cycle storage or likely transport impacts. This is an information deficiency rather than a demonstrated highways objection.

The formal application should therefore identify the number and dimensions of existing/proposed parking spaces, demonstrate safe access, identify secure cycle parking and provide a proportionate Transport Statement if required by the Council.

13. Refuse and Recycling

The pre-application report identifies the absence of dedicated refuse and recycling storage information as an outstanding matter. The revised application should provide a clearly dimensioned refuse and recycling storage area and a short Waste Management Strategy explaining collection arrangements, storage and management responsibilities.

This will also support the wider case that the revised HMO can be properly managed without creating an adverse visual or residential amenity impact.

14. Design and Rear Extension

The pre-application report did not identify a significant character or appearance objection to the proposed single-storey rear extension. It specifically recognised the extant prior approval for a 4m-deep rear extension as a fallback position that weighs in favour of the scheme.

The revised planning case therefore does not rely upon the extension as a principal benefit. The main planning issue remains the proposed C3 to C4 use and its effects. The existence of the extant fallback nevertheless reduces the extent to which the physical extension itself should be treated as additional planning harm.

15. Planning Balance

The applicant acknowledges that the proposal gives rise to a policy conflict because the existing three-bedroom family dwelling would cease to operate as a conventional self-contained C3 dwelling. This conflict is a material consideration and is not being disregarded.

However, the planning balance should take account of the materially revised proposal. The scheme is now a four-bedroom HMO rather than a five-bedroom HMO, includes a dedicated 10m² communal lounge, retains the property in residential use and provides a defined internal and external amenity offer.

The principal alleged harms identified at pre-application stage were not simply the abstract change from C3 to C4, but the combination of family housing loss, high occupancy, absence of communal living space, pressure on the 25m² garden, increased activity and insufficient supporting information. Several of those matters have been materially reduced or addressed by the revised scheme.

The Council's own pre-application report confirms that the five-year housing land supply shortfall engages paragraph 11(d). The applicant therefore submits that the decision maker should undertake the required planning balance and should give meaningful weight to the provision of additional housing choice and the efficient use of an existing residential property.

Against this, the principal adverse consideration is the loss of a three-bedroom family dwelling. That harm should be recognised, but its weight should be moderated by the fact that the building remains entirely in residential use, the revised scheme is lower in intensity than the earlier proposal, and the accommodation provides a different form of housing for people who need or choose shared living arrangements.

The revised proposal also removes the key internal amenity weakness identified by the officer through the provision of a 10m² communal lounge. The smaller number of bedrooms reduces potential movements and garden pressure compared with the superseded five-bedroom arrangement.

When assessed as a whole, the applicant considers that the revised scheme represents a balanced and proportionate response to the Council's concerns and that the identified policy conflict does not justify refusal where the remaining technical matters can be satisfactorily addressed through plans, supporting documents and appropriate planning conditions.

16. Officer Concerns and Revised Scheme Response

Pre-application concern	Original position	Revised proposal	Planning response
Loss of family dwelling	3-bed C3 to HMO	Still a change from C3 to C4	Acknowledge policy conflict; weigh against continued residential use and housing choice.
Intensity	5 bedrooms / potentially 6 occupiers	4 bedrooms	Material reduction in intensity.
Communal living	No shared lounge	10m ² dedicated lounge	Directly addresses a central internal amenity concern.
Bedroom sizes	11, 9, 7, 10, 12m ²	12, 11, 9, 7m ²	Three rooms are 9m ² or larger; communal lounge supplements private rooms.
Garden	25m ² serving up to 6 plus visitors	25m ²	Still constrained, but garden is supplemented by 10m ² internal lounge and fewer bedrooms.
Neighbour amenity	Concern over movements/noise	Lower bedroom count + management plan	Reduced intensity; management controls should be provided.
Parking/cycle	Insufficient information	To be demonstrated on site plan.	Provide parking plan, cycle storage and Transport Statement/Assessment as appropriate.
Waste	No dedicated strategy	To be demonstrated on site plan.	Provide refuse/recycling storage and Waste Strategy.

17. Recommended Supporting Information for the Formal Application

- Planning Statement / Planning Justification incorporating this response to the pre-application advice.
- Existing and proposed floor plans, elevations and sections with accurate room dimensions, bedroom areas and GIA.
- Dedicated HMO Management Plan covering occupancy, resident conduct, visitors, noise, waste, maintenance, complaints and management contact details.
- DMH 5 HMO concentration assessment using the Council's current HMO, council tax and planning records.
- Parking and cycle parking plan, with existing/proposed parking spaces clearly dimensioned.
- Proportionate Transport Statement/Assessment if required by the Council.
- Refuse and recycling storage plan and Waste Management Strategy.
- Landscaping / garden management information.
- Design and Access Statement where required.
- Sustainability Statement and BNG information in accordance with the Council's validation requirements.

18. Conclusion

The revised proposal at 8 Paget Road represents a materially improved and lower-intensity scheme compared with the five-bedroom HMO considered within the pre-application report. The reduction to four

bedrooms and the introduction of a dedicated 10m² shared communal lounge directly address the Council's principal concerns regarding over-intensification, poor internal communal provision and excessive reliance upon the constrained 25m² rear garden.

The applicant accepts that the change from a three-bedroom C3 family dwelling to C4 accommodation gives rise to a conflict with aspects of DMH 1, DMH 2 and London Plan Policy H10. Nevertheless, the building remains in residential use, the proposal provides a distinct form of housing accommodation, and the revised scheme materially reduces the intensity and improves the quality of occupation.

The Council's pre-application advice also confirms that its five-year housing land supply position engages the paragraph 11(d) planning balance. The applicant therefore considers that the proposal should be assessed through a balanced consideration of the identified family-housing policy harm against the housing-choice benefits, continued residential use, efficient use of an existing urban property and the substantial improvements made to the scheme following pre-application advice.

Subject to the submission of the recommended technical information and appropriate management arrangements, the revised proposal is considered capable of providing an acceptable form of small-scale HMO accommodation without causing unacceptable harm to neighbouring residential amenity or the character of the area. Planning permission is therefore respectfully requested.

Source and policy note

This statement has been prepared primarily from the Hillingdon Council pre-application report for reference 79552/PRC/2026/102, dated 14 August 2026, together with the revised accommodation schedule supplied for the current scheme. The pre-application report should be retained with the application records as the source of the Council's site-specific comments and appeal references.

The Council's website states that its latest five-year supply document covers 2025/26–2029/30 and was published in April 2026. The current NPPF should be checked again immediately before submission because the national Framework was revised in August 2026.