

Sustainability Statement

Proposed 4-Bedroom Class C4 HMO with Shared Communal Lounge

8 Paget Road, Uxbridge
Hillingdon Council

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

1. Introduction

This Sustainability Statement has been prepared in support of the proposed change of use of **8 Paget Road, Uxbridge, UB10 0SW**, from a Class C3 dwellinghouse to a **four-bedroom House in Multiple Occupation (HMO) accommodating a maximum of four occupants**.

The statement has been prepared having regard to the matters identified within Hillingdon Council's pre-application response and should be read alongside the submitted planning drawings, including **Drawing P002 – Proposed Floor Plans & Elevations & Site Block Plan**, dated 08.09.2026.

The Hillingdon pre-application response specifically identifies a **Sustainability Statement** as part of the information to accompany a formal planning application.

The purpose of this statement is to demonstrate how sustainability principles have been incorporated into the proposal in relation to:

- Energy efficiency;
- Building fabric;
- Heating;
- Lighting;
- Water efficiency;
- Waste and recycling;
- Sustainable transport;
- Sustainable drainage; and
- Biodiversity and Biodiversity Net Gain (BNG).

The proposal is a relatively small-scale residential conversion within an existing built-up residential area. The sustainability approach is therefore focused upon improving operational efficiency, minimising unnecessary resource consumption, retaining existing

landscape and permeable areas, and ensuring that the occupation of the property is appropriately managed.

2. Site and Development Context

The application site comprises an existing **two-storey end-of-terrace property** on the western side of Paget Road, Uxbridge. The property benefits from existing off-street parking to the front and a private rear garden. The Council's pre-application response confirms that the site has a **PTAL rating of 2** and is located within an established residential area.

The submitted P002 drawing confirms that the revised proposal retains:

- **2 existing car parking spaces**, each measuring approximately 2.4m x 4.8m;
- **2 cycle hoops**, fixed to the ground;
- **25m² of garden/amenity space**;
- **3 no. 240-litre waste/recycling bins**; and
- A defined route for the movement of bins to the collection point.

The existing building therefore provides the principal built form and infrastructure, avoiding the need for the construction of a new dwelling or a new-build residential development.

The sustainability strategy consequently seeks to maximise the environmental benefits achievable within the constraints of the existing property.

3. Energy Efficiency

The proposed development will seek to minimise energy consumption through the use of energy-efficient building services, appliances, lighting and controls.

As the proposal involves the conversion and internal adaptation of an existing dwelling rather than the construction of a new building, the sustainability strategy recognises the importance of improving energy efficiency where reasonably practicable without requiring disproportionate intervention into the existing structure.

The following principles will be adopted:

- Energy-efficient appliances will be used wherever appliances are replaced or upgraded;
- Heating controls will be provided to allow the heating system to be controlled efficiently;

- Thermostatic controls will be provided to individual habitable rooms where appropriate;
- Hot-water use will be controlled to reduce unnecessary energy consumption;
- LED lighting will be used throughout the property;
- Lighting will be controlled to prevent unnecessary operation;
- Where building elements are upgraded or replaced, materials and components with appropriate thermal performance will be selected;
- Draught-proofing and appropriate air-tightness measures will be incorporated where reasonably practicable; and
- Any new or replacement building services will comply with the relevant requirements of the Building Regulations applicable at the time of installation.

The overall objective is to reduce the property's operational energy demand while maintaining appropriate levels of comfort for residents.

4. Building Fabric

The existing building envelope will be retained wherever practicable.

Retaining and adapting the existing building represents a sustainable approach because it avoids the environmental impacts associated with demolition and the construction of an entirely new building.

Where elements of the building fabric are altered, repaired or replaced, consideration will be given to:

- Thermal insulation;
- Reduction of unwanted heat loss;
- Air permeability and draught reduction;
- Thermal bridging;
- Moisture control;
- Durability of materials; and
- Compliance with the relevant Building Regulations requirements.

Any new construction associated with the approved rear extension will be undertaken in accordance with the requirements of the relevant Building Regulations approval and will incorporate appropriate levels of insulation and thermal performance.

The use of durable materials will also assist in reducing the frequency of replacement and associated material consumption over the life of the building.

5. Heating and Hot Water

The property's heating and hot-water systems will be operated and maintained to minimise unnecessary energy consumption.

Where existing heating equipment is retained, it will be maintained in an efficient and safe operating condition.

Where heating equipment is replaced during the lifetime of the development, consideration will be given to the use of high-efficiency heating technology appropriate to the property, together with effective heating controls.

The heating strategy will incorporate, where applicable:

- Programmable heating controls;
- Thermostatic radiator controls;
- Appropriate zoning and temperature control;
- Efficient hot-water controls;
- Regular servicing and maintenance; and
- Efficient replacement equipment when existing systems reach the end of their useful life.

The final heating installation will comply with the Building Regulations and applicable energy-efficiency requirements in force at the time of installation.

Residents will also be provided with appropriate information regarding the efficient use of the heating system.

6. Lighting

Lighting represents an important element of the property's operational energy demand.

The proposal will therefore incorporate **energy-efficient LED lighting** throughout the accommodation.

Lighting will be designed and operated to avoid unnecessary energy consumption, with appropriate switching and controls.

Particular consideration will be given to communal areas, including:

- Entrance and circulation areas;
- Kitchen;
- Shared communal lounge;
- Bathrooms/WCs; and
- External access areas.

Where appropriate, lighting to circulation and external areas will be controlled by suitable switching or automatic controls to prevent lights being left on unnecessarily.

Residents will be encouraged to switch off lighting when rooms and communal areas are not occupied.

7. Water Efficiency

The development will incorporate measures intended to reduce potable water consumption.

Water-efficient fittings will be specified where fixtures are replaced or installed, including:

- Dual-flush WCs;
- Water-efficient taps;
- Flow-restricted taps where appropriate;
- Water-efficient shower fittings; and
- Efficient domestic appliances.

The use of water-efficient fittings will reduce both potable water consumption and the amount of energy required for hot-water production.

Residents will be encouraged to adopt responsible water-use practices, including avoiding unnecessary running of taps and reporting leaks promptly.

Any replacement plumbing fixtures will be selected with regard to water efficiency and durability.

8. Waste and Recycling

Waste management is a specific matter identified within the Hillingdon pre-application response.

The Council stated that the previous submission did not provide sufficient information regarding refuse and recycling storage and specifically requested details of refuse/recycling storage together with a Waste Management Plan. The Council also noted the need to ensure that waste facilities do not adversely affect the appearance of the property or the amenities of neighbouring occupiers.

The revised P002 site plan now identifies:

3 no. 240-litre waste and recycling bins, together with a defined route of bins on collection day.

The total nominal storage capacity is therefore:

3 × 240 litres = 720 litres

For the proposed maximum occupancy of four residents, this provides approximately:

180 litres of nominal storage capacity per resident.

Waste will be appropriately separated between the available waste and recycling streams in accordance with Hillingdon Council's collection arrangements.

The waste strategy will seek to:

- Encourage recycling;
- Minimise residual waste;
- Prevent loose waste from accumulating around the property;
- Prevent waste from being stored within the garden;
- Keep bins within the site except when presented for collection;
- Maintain the bin storage area in a clean condition;
- Ensure bins are accessible to collection operatives;
- Present bins on the collection day using the route identified on P002; and

- Return bins to their designated storage location following collection.

Food waste will be managed separately where required by the Council's collection arrangements.

A separate Waste Management Plan is submitted in support of the application.

The approach directly addresses the waste-storage concerns raised by the Council during the pre-application process.

9. Sustainable Transport

The Council's pre-application response identifies transport, parking, cycle parking and vehicle ownership as matters requiring further information. The Council confirmed that the site has a **PTAL rating of 2** and recommended that a Transport Statement/Assessment be provided.

The revised proposal incorporates sustainable transport measures appropriate to the scale of the development.

The P002 site plan identifies:

- **2 existing off-street car parking spaces**, retained within the site; and
- **2 cycle hoops fixed to the ground.**

The provision of secure and convenient cycle parking encourages residents to use bicycles for appropriate local journeys rather than relying exclusively upon private vehicles.

The development will also benefit from the established pedestrian and public transport network serving the surrounding residential area.

The sustainable transport strategy therefore seeks to encourage:

- Walking for short local journeys;
- Cycling for suitable local journeys;
- Use of public transport where practical;
- Reduced reliance upon private car travel; and
- Appropriate management of vehicle ownership and parking within the site.

The Transport Statement submitted alongside the application provides further information regarding parking, vehicle ownership, cycle parking, highway matters and the anticipated transport characteristics of the four-person HMO.

10. Sustainable Drainage

The development is located within an established residential property and does not propose the creation of a new large-scale area of hardstanding.

The existing rear garden/amenity area is retained, with the submitted P002 drawing identifying approximately **25m² of garden/amenity space**.

The retention of garden and permeable areas assists in maintaining opportunities for natural infiltration and reducing unnecessary surface-water runoff.

The development will seek to:

- Retain permeable garden areas;
- Avoid unnecessary additional hardstanding;
- Ensure that any new external surfaces are appropriately designed;
- Direct surface water to appropriate drainage infrastructure;
- Prevent uncontrolled discharge onto neighbouring properties or the public highway; and
- Incorporate permeable or infiltration-based solutions where reasonably practicable and appropriate to the site.

The existing drainage arrangements will be retained where suitable, subject to Building Regulations requirements and any necessary approval associated with works to the property.

As the proposal is principally a change of use of an existing residential property, the development does not involve the creation of a large new impermeable development footprint.

11. Biodiversity and Biodiversity Net Gain

Biodiversity Net Gain (BNG) has been considered as part of the proposed development in accordance with the statutory biodiversity requirements and the matters identified within Hillingdon Council's pre-application response.

The Council's pre-application response confirms that Biodiversity Net Gain is a statutory requirement introduced through Schedule 7A of the Town and Country Planning Act 1990 and identifies BNG information as part of the information to accompany a formal planning application.

The application site has a total area of approximately **118m² (0.0118 hectares)**.

The proposal principally comprises the change of use of the existing dwelling from Class C3 to a four-bedroom Class C4 HMO, together with the associated internal alterations. The existing built form and garden area are substantially retained.

The submitted P002 Proposed Site Plan identifies approximately **25m² of garden/amenity space**, which will be retained as part of the proposed development.

11.1 Biodiversity Net Gain Exemption

Under the current statutory Biodiversity Net Gain framework, development on a site of **0.2 hectares or below** may qualify for the small-sites exemption from the mandatory BNG requirement, subject to the applicable statutory criteria.

The application site measures only **118m² (0.0118 hectares)** and is therefore substantially below the 0.2-hectare threshold.

Furthermore, the proposal is principally a change of use of an existing residential property and does not involve the redevelopment of a large undeveloped site. The existing garden/amenity area is retained and no significant loss of existing landscaped area is proposed.

On this basis, the proposal is considered to fall within the scope of the **small-sites Biodiversity Net Gain exemption**, subject to the relevant statutory conditions being satisfied.

The appropriate exemption will be identified within the planning application documentation and the relevant BNG information will be provided as required by the Council.

A Biodiversity Gain Plan and mandatory 10% biodiversity net gain calculation are therefore not considered necessary where the statutory exemption applies.

11.2 Existing Garden and Habitat

The proposal retains the existing external garden/amenity area, identified on Drawing P002 as approximately **25m²**.

The retention of this area is considered beneficial in sustainability terms as it avoids unnecessary loss of external green space and maintains opportunities for planting, natural infiltration and small-scale urban habitat.

No significant alteration to the garden is proposed as part of the change of use.

Where landscaping or maintenance works are undertaken, existing vegetation will be retained wherever practicable and opportunities for appropriate planting can be incorporated.

11.3 Proportionate Biodiversity Measures

Although the development is expected to benefit from the statutory BNG exemption, the applicant recognises the value of maintaining and enhancing biodiversity within the site where reasonably practicable.

The following measures will therefore be encouraged:

- Retention of the existing garden/amenity space;
- Retention of existing planting wherever practicable;
- Avoidance of unnecessary removal of vegetation;
- Use of appropriate native or wildlife-supporting planting where new planting is undertaken;
- Avoidance of excessive external lighting affecting garden areas; and
- Appropriate ongoing management of the garden.

These measures are proportionate to the very small site area and the nature of the proposed change of use.

11.4 Conclusion on BNG

The application site measures approximately **118m² (0.0118 hectares)**, which is significantly below the **0.2-hectare threshold** applicable to the small-sites BNG exemption.

The proposal is also principally a change of use of an existing dwelling, with the existing **25m² garden/amenity area retained**.

Accordingly, subject to the statutory exemption criteria being satisfied, the development is considered to qualify for the **small-sites Biodiversity Net Gain exemption** and a mandatory 10% BNG requirement would not apply.

The retention of the existing garden and proportionate biodiversity measures nevertheless ensure that the proposal continues to make appropriate use of the limited opportunities available for maintaining biodiversity within this small residential site.

12. Biodiversity Enhancement Measures

Although the development is expected to benefit from a statutory BNG exemption, opportunities for proportionate biodiversity enhancement will be retained where reasonably practicable.

These may include:

- Retention of the existing garden;
- Retention of existing planting wherever practicable;
- Avoidance of unnecessary removal of vegetation;
- Use of planting that provides habitat and seasonal interest where landscaping works are undertaken;
- Avoidance of unnecessary external lighting impacts upon garden areas; and
- Encouraging residents to maintain garden areas appropriately.

These measures provide environmental benefits without requiring significant alteration to the existing residential property.

13. Sustainable Management and Resident Awareness

The sustainability performance of the property will depend not only upon the physical characteristics of the building but also upon how it is occupied and managed.

The HMO management arrangements will therefore encourage residents to:

- Switch off lights when not required;
- Avoid unnecessary heating;
- Use heating controls responsibly;
- Avoid unnecessary water consumption;
- Report leaking taps, toilets or pipes;
- Separate waste and recycling correctly;
- Avoid excessive waste generation;
- Use cycling and walking for appropriate local journeys; and
- Keep communal and external areas clean and appropriately maintained.

The landlord/HMO manager will have responsibility for ensuring that communal facilities are maintained and that waste and recycling arrangements operate effectively.

14. Response to the Hillingdon Pre-Application Advice

The Sustainability Statement has been prepared in direct response to the information requirements identified by Hillingdon Council.

The Council's pre-application response identifies a number of matters requiring further information, including waste, transport, cycle parking, refuse storage and sustainability.

The revised proposal now incorporates:

Sustainability Matter	Proposed Provision
Energy efficiency	Energy-efficient equipment, controls and Building Regulations compliance
Building fabric	Retention and improvement of existing fabric where works are undertaken
Heating	Efficient heating system and appropriate heating controls
Lighting	Energy-efficient LED lighting and appropriate controls
Water efficiency	Water-efficient sanitary fittings and appliances
Waste	3 × 240L waste/recycling bins and managed collection arrangements
Sustainable transport	2 cycle hoops and retention of 2 off-street parking spaces
Sustainable drainage	Retention of garden/permeable areas and appropriate surface-water management
Biodiversity	Retention of existing garden/amenity area and proportionate biodiversity measures
BNG	Statutory exemption to be identified on the application form, subject to confirmation of site area and habitat criteria

The physical waste, cycle, parking and amenity provisions are shown on Drawing P002.

15. Conclusion

The proposed development at **8 Paget Road, Uxbridge** represents the sustainable adaptation and continued use of an existing residential property.

The sustainability strategy focuses upon reducing operational energy and water consumption, improving the efficiency of building services, encouraging sustainable travel, retaining permeable and garden areas, managing household waste responsibly and avoiding unnecessary loss of existing environmental resources.

The proposal retains **25m² of garden/amenity space**, provides **2 cycle parking spaces**, retains **2 existing off-street car parking spaces** and incorporates **3 × 240-litre waste/recycling bins** with a defined collection route.

The approach is proportionate to the scale and nature of the development and responds directly to the sustainability-related information requested by Hillingdon Council.

In respect of Biodiversity Net Gain, the application will identify the relevant statutory exemption, subject to confirmation of the final red-line site area and the absence of impacts upon onsite priority habitat. Current national guidance provides an exemption for developments on sites of **0.2 hectares or below**, where the applicable criteria are satisfied.

Overall, the proposal incorporates appropriate sustainability measures for the conversion of an existing dwelling to a four-bedroom HMO and demonstrates that sustainability considerations have been appropriately integrated into the development and its future management.