Development Management

APP REF No. 79879/APP/2026/176

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:	21 NORTH AVENUE HAYES
Development:	Construction of a part two storey, part single storey rear extension; together with the conversion of a single family dwellinghouse (Use Class C3) into a six-bed person HMO, with a maximum occupancy of six people and associated works.
LBH Ref Nos:	**79879/APP/2026/176**
Drawing Nos:	P005 Proposed Site Plan L001 Location Plan P002 Existing Elevation E004 Existing Section EP001 Existing and Proposed Block Plan E003 Existing Side Elevations E001 Existing Floor Plans P001 Proposed Floor Plans P002 Proposed Front and Rear Elevations P003 Proposed Side Elevations P004 Proposed Section
Date Plans received:	21-01-26 **Date(s) of Amendments(s):**
Date Application valid	21-01-26

1. SUMMARY

Planning permission is sought for the change of use from Class C3 dwellinghouse to a Class C4 HMO for 6 persons, including part single part two storey rear extension and associated bin and cycle storage.

The proposal represents a material intensification of the existing three-bedroom single family dwelling, introducing six 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. No HMO Management Plan has been submitted to outline any measures to mitigate these inherent impacts.

The development also fails to provide acceptable living conditions for future occupiers. The only communal area is a 12.3 sqm kitchen, significantly below what would typically be required for six occupants, with no shared living or dining space. Bedroom 3 would suffer from inadequate privacy due to their direct relationship with the communal garden.

Highway impacts are also unacceptable. Two off-street parking spaces would be retained within the forecourt where three are required. Furthermore, the applicant has failed to demonstrate that the two parking spaces to be retained can physically be accommodated, accessed safely, or used without obstruction. Therefore, the proposed parking arrangement would be unworkable, unsafe, and contrary to adopted Hillingdon standards. Also it would be likely resulting in overspill parking and associated highway safety concerns in a PTAL 2 area where North Avenue has a narrow carriageway that effectively functions as a single-lane road. The proposed cycle storage within the rear garden without any external side access is not considered convenient, accessible, and easy to use, therefore unacceptable.

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 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. 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 that the extension and conversion of almost the entire floor area to bedrooms and the 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 three-bedroom dwellinghouse to a Class C4 HMO for six persons represents a significant and harmful intensification of the site. The use of the property by six 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).

3. NON2 Poor Design

The proposed first-floor rear extension, by reason of its flat-roof design, would fail to harmonise with the established character of the host dwelling and the surrounding area. It would be contrary to 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 Policies DMHD1 and DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

4. NON2 Living Conditions for Future Occupiers

The proposed development, by reasons of its inadequate internal communal space (i.e. only a 12.3sqm kitchen serving six occupiers and no shared living or dining space), would result in poor functionality, failing to provide adequate internal amenity for the future occupants. Bedroom 3, in absence of defensible space, would experience insufficient privacy due to their direct relationship with the communal rear garden. The development therefore fails to provide satisfactory living conditions, contrary to Policies DMH 5, DMHB 11, DMHB 16 and DMHB 18 of the Hillingdon Local Plan: Part Two (2020), Policies D3 and D6 of the London Plan (2021) and Paragraph 135(f) of the NPPF (2024).

5. NON2 Highway Safety and Parking

The proposed development, by reasons of its insufficient car parking provision and substandard car parking spaces proposed, would lead to overspill parking on the public highways and therefore increased obstruction and vehicle conflict, resulting unacceptable highway safety risks. No parking stress survey has been submitted to demonstrate that local streets can accommodate this impact. The proposal is contrary to Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan: Part Two (2020), Policies T4 and T6 of the London Plan (2021) and Paragraph 116 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 14 Trees and Landscaping

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
DMEI 9	Management of Flood Risk
DMEI 10	Water Management, Efficiency and Quality
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T6.1	(2021) Residential parking
LPP D13	(2021) Agent of change
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 contains a 2-storey terrace dwellinghouse on the western side of North Avenue. The host building has be extended by a front porch.

In terms of the planning constraints, the site is not located within any conservation area nor

contains any listed building. It has a PTAL rating of 1b and within Flood Risk Zone 1.

3.2 Proposed Scheme

Planning permission is sought for a part two - part single storey rear extension; and change of use from Class C3 (Dwellinghouse) to Class C4 (HMO) with a maximum occupancy of six people and associated works.

The proposed HMO would include 6 single en-suite bedrooms and a communal kitchen on G/F. The rear garden can be accessible via the communal kitchen or directly via Room 3 on G/F.

The proposed G/F rear extension would be 3m deep and 7.9m wide (i.e. full width of the original host building) with a 2.55m high flat roof. The proposed 1/F rear extension would be 3m deep and 3.917m wide with a 4.955m high flat roof. It would set back from both side boundaries by 2m.

3.3 Relevant Planning History

79879/APP/2026/154 21 NORTH AVENUE HAYES

Erection of a part single part two storey rear extension

Decision: 05-03-2026 Refusal

Comment on Planning History

79879/APP/2026/154 - Erection of a part single part two storey rear extension
- Refused on 5.3.2026
- Reasons: The proposed development does not constitute permitted development by virtue of the provisions of Schedule 2, Part 1, Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), as the enlarged part of the dwellinghouse would be within 2 metres of the boundary of the curtilage of the dwellinghouse, and the height of the eaves of the enlarged part would exceed 3 metres.

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

6 neighbouring properties were consulted on 05-02-26 with the consultation expired on 26-02-26. 9 public representations were received objecting on the application. The objections were based on the following reasons:
- 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.

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.
- The impacts created from the HMO use and the increase in occupancy are discussed below.

INTERNAL

Access Officer: This application has been evaluated in accordance with the requirements of the 2021 London Plan policy D7. Given that the existing dwelling was constructed before the implementation of accessible housing standards, the aforementioned policy does not apply to the proposed conversion from a dwelling-house (C3) to a House in Multiple Occupation (HMO) (C4). There would be no loss of accessible housing stock as a result of this proposed Change of Use, if approved. Conclusion: no objections raised from an accessibility perspective.

Highway Authority:

The proposal seeks permission to convert a 3-bedroom dwelling (Use Class C3) into a six-person House in Multiple Occupation (HMO).

At the outset, it is noted that no supporting documentation has been submitted with the application, such as a Design and Access Statement, Transport Statement, Parking/Access Plan, or any technical evidence.

Hillingdon's Domestic Vehicle Footway Crossover Policy (DVFCP) requires that applicants demonstrate compliance with relevant standards where vehicular access is proposed, and the absence of this material means that the Highway Authority (HA) cannot verify the suitability, safety, or policy compliance of the scheme.

In particular, without technical documents, the HA cannot evaluate the adequacy of parking arrangements, pedestrian safety, cycle access, or compliance with adopted guidance.

Notwithstanding the above concerns, the HA has reviewed the limited information contained in the application form and plans, and comments as follows:

1. Car Parking, Forecourt Layout, and Access Constraints

The application form states that 2 on-site parking spaces currently exist and are to be retained. However:
·No forecourt dimensions or swept-path details have been provided to demonstrate how two vehicles can park safely and independently without obstructing pedestrian access or the building entrance.
·A clear, unobstructed pedestrian route of at least 1 metre is required between the building entrance and the public highway to ensure safe and unobstructed access for emergency egress, residents, including wheelchair users and people with reduced mobility.
·The site does not appear to benefit from a formal, authorised dropped kerb. Hillingdon's DVFCP requires that a properly authorised crossover must exist before any forecourt parking can be considered lawful.
·A lamp column is located on the public highway approximately 1 metre south of the northern site boundary directly in front of the forecourt. Hillingdon policy states that if a utility apparatus or street furniture (such as a telegraph pole or lamp column) lies within the footprint of a proposed crossover, including its tapers, the relevant utility owner must assess it and relocation may be required at the applicant's expense (Hillingdon DVFCP).

Given the above, the applicant has not demonstrated that two on-site parking spaces can physically be accommodated, accessed safely, or used without obstruction. In its current form, the parking arrangement appears unworkable, unsafe, and contrary to adopted Hillingdon standards.

2. Cycle Parking and Access
The plans indicate that cycle storage is proposed within the rear garden.
·The site has no external side access, meaning cycles would need to be carried through the internal living spaces to reach the storage area.
·This arrangement is contrary to the London Plan (Policy T5) and the London Cycle Design Standards (LCDS), which require cycle parking to be convenient, accessible, and easy to use, avoiding arrangements that require cycles to be moved through internal rooms or narrow corridors.
·TfL and LCDS best practice require that cycle parking be located where it can be used without obstruction, without steep gradients, and without having to pass through habitable rooms.
The only feasible location for compliant and accessible cycle parking is the front forecourt. However, placing cycle storage in this area would remove any ability to provide on-site car parking, as it would obstruct both the building entrance and convenient access to the cycle store. This results in a direct conflict between car parking provision, pedestrian access, and cycle accessibility requirements, leading to non-compliance with local and London-wide standards.

The site has a PTAL rating of 2, indicating poor access to public transport relative to London as a whole. This low level of accessibility typically results in a higher dependence on private car use for day-to-day travel by future occupants. Consequently, developments in low-PTAL areas are expected to demonstrate fully compliant and policy-justified on-site parking provision in accordance with adopted standards, as the opportunity to rely on sustainable modes is inherently limited.

The nearest bus stops are located along Church Road, approximately 500-600 metres from the site, which is beyond the commonly accepted 400-metre walking distance threshold for convenient access to bus services. This further reinforces the likelihood of car reliance and the need for robust, compliant parking arrangements within the development.

3. Applicable Parking Standards
Proposed development:
The London Plan (2021) does not provide specific standards for HMO, however LBH Local Plan Part 2: Appendix C does therefore it applies in such cases. For HMOs (up to 6 occupants),

Appendix C requires:
·1 car parking space per 2 occupants
·1 cycle parking space per occupant

Therefore, for a 6-person HMO, the policy requirement is therefore:
·3 on-site car parking spaces
·6 secure and accessible cycle parking spaces

For the reasons outlined above, the proposed development will have zero onsite car parking.

Therefore, given the requirement for 3 on-site parking spaces, the proposal results in a net shortfall that would displace parking demand for 3 vehicles onto the unrestricted public highway. North Avenue has a narrow carriageway that effectively functions as a single-lane road, requiring vehicles to pull over to allow oncoming traffic to pass. As a result, available kerbside space is already in high demand, and any additional on-street parking would further obstruct vehicle movements and exacerbate existing highway safety concerns. Furthermore, the high number of existing dropped kerbs along the street significantly reduces the amount of usable kerbside space for parking, meaning that any displaced demand arising from this proposal is likely to intensify parking stress and adversely affect the operation of the highway.

Alternatively, the applicant has not undertaken any assessment of existing parking stress to demonstrate whether any spare kerbside capacity exists to accommodate the overspill parking demand generated by the proposal. Without a robust parking survey, undertaken within 100m of the site during verified peak residential parking periods (not early am periods), it is not possible to establish baseline conditions or confirm that the displaced vehicles would not exacerbate existing parking pressures. In the absence of this evidence, the impact on on-street parking cannot be properly assessed, and the proposal fails to demonstrate that it would not result in harmful parking stress or adverse highway impacts. It should also be noted that parking stress surveys are only appropriate in locations where site-specific highway conditions are not already as constrained/congested on the local network.

The HA further clarifies that the public highway cannot be treated as an ancillary extension of private parking provision, nor can applicants rely on kerbside capacity to compensate for failing to meet adopted on-site parking standards. Accepting such an approach would allow any residential subdivision to disregard required parking provision by displacing demand onto the highway network, directly undermining Hillingdon Local Plan Part 2 Policy DMT 6, the London Plan, and wider strategic aims to manage parking pressure sustainably.

Parking standards exist to ensure that development proceeds in a safe, sustainable, and policy-compliant manner. They are not discretionary, and they cannot be bypassed through reliance on on-street availability surveys, particularly in low PTAL locations where private car ownership is predictably high. Therefore, given the site-specific conditions the HA does not accept that any parking survey is likely to change the HA's position.

4. Overall Assessment
Given the absence of required technical documentation and the significant issues identified with:
·Lack of a lawful or workable vehicular access,
·Inability to demonstrate safe or compliant car parking provision,
·Presence of a lamp column within the access envelope requiring utility review or relocation,
·Non-compliant and inaccessible cycle parking arrangements,
·Lack of evidence demonstrating compliance with Hillingdon's Domestic Vehicle Footway Crossover

Policy and the London Plan's transport objectives,

Recommendation:
The HA objects to the proposed development as it fails to demonstrate adequate on-site parking, resulting in overspill onto the public highway and leading to inconsiderate or potentially illegal parking, increased nuisance, and added pressure on limited kerbside capacity, which is prejudicial to highway safety. The submission also fails to provide sufficient detail to demonstrate compliant cycle parking provision. Collectively, these shortcomings result in non-compliance with London Plan Policies T5 and T6, Hillingdon Local Plan Part 2 Policies DMT 2 and DMT 6, Manual for Streets, LTN 1/20, London Cycling Design Standards, and the NPPF 2025 - Promoting Sustainable Transport.

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 14	Trees and Landscaping
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
DMEI 9	Management of Flood Risk
DMEI 10	Water Management, Efficiency and Quality
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking

LPP T4	(2021) Assessing and mitigating transport impacts
LPP T6.1	(2021) Residential parking
LPP D13	(2021) Agent of change
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 EXTENSIONS

The nearest residential property subject to the potential impacts of the proposed extensions would be Nos. 19 & 23 North Avenue.

Impact on No. 19 North Avenue:

No. 19 is a 2-storey terrace property to the immediate south of the application site. The proposed G/F storey rear extension would project 3m beyond the rear wall No. 19 at a height of 2.55m. Given the modest depth and height, no significant overshadowing, loss of outlook and increased sense of enclosure would be resulted. The proposed 1/F rear extension would set back 2m from the shared side boundary with a height of 4.955m. With such setback, the proposed rear extension would not fall within the 45-degree line of the centre of the nearest habitable window at No. 19.

Impact on No. 23 North Avenue:

No. 23 is a 2-storey terrace property to the immediate north of the application site with existing part 1 storey part 2 storey rear extension. The proposed G/F storey rear extension would not project beyond the rear wall No. 23, therefore no significant overshadowing, loss of outlook and increased sense of enclosure. The proposed 1/F rear extension would set back 2m from the shared side boundary with a height of 4.955m. With such setback, the proposed rear extension would not fall within the 45-degree line of the centre of the nearest habitable window at No. 23.

No additional window or opening directly facing the adjoining neighbouring properties would be installed, therefore no privacy impact.

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 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. This demonstrates in an over intensification of which there are significant recognises and evidenced harm.

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

The change of use, however, represents a substantial intensification of the original three-bedroom 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 a change of use to a C4 HMO in Hayes was considered by an appeal Inspector under appeal reference APP/R5510/W/25/3360554 in respect of planning application reference 20650/APP/2024/1895. The appeal 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."

In the case of the application property, the original dwelling was a two-bedroom property. The use of the property by six individuals, 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 family sized homes. The proposals would result in a significant intensification in the number of occupiers 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.

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.

REAR EXTENSION

With regard to rear extensions, Policy DMHD 1 requires:
i) single storey rear extensions on terraced or semi-detached houses with a plot width of 5 metres or less should not exceed 3.3 metres in depth or 3.6 metres where the plot width is 5 metres or more;
ii) single storey rear extensions to detached houses with a plot width of 5 metres or more should not exceed 4.0 metres in depth;
iii) flat roofed single storey extensions should not exceed 3.0 metres in height and any pitched or sloping roofs should not exceed 3.4 metres in height, measured from ground level;
iv) in Conservation Areas and Areas of Special Local Character, flat roofed single storey extensions will be expected to be finished with a parapet;
v) balconies or access to flat roofs which result in loss of privacy to nearby dwellings or gardens will not be permitted;
vi) two storey extensions should not extend into an area provided by a 45-degree line of sight drawn from the centre of the nearest ground or first floor habitable room window of an adjacent property and should not contain windows or other openings that overlook other houses at a distance of less than 21 metres;
vii) flat roofed two storey extensions will not be acceptable unless the design is in keeping with the particular character of the existing house;
viii) pitched roofs on extensions should be of a similar pitch and materials to that of the original roof and subordinate to it in design. Large crown roofs on detached houses will not be supported; and
ix) full width two storey rear extensions are not considered acceptable in designated areas or as extensions to Listed Buildings or Locally Listed Buildings.
Overall, on balance, the proposed development is considered acceptable and would not cause harm to the character and appearance of the host dwelling, nor the surrounding area.

The proposed G/F rear extension would not be visible from the streetscene. It would comply with the maximum depth and height for single storey rear extensions under Policy DMHD 1.

The proposed 1/F rear extension would feature a flat roof design whilst the properties in the immediate surroundings are characterised by pitched roof design with examples of 1/F rear extension in hipped roof design, in contrary to the requirement under Policy DMHD 1. Despite being not readily visible from North Avenue, the proposed 1/F rear extension would still be visible from the neighbouring properties and partially visible from the existing gap in between Nos. 8 & 9 St Mary's Crescent. Therefore, the proposed flat roof design would be out of keeping with the character and design of the host building and the area, creating harm to the streetscene.

The proposed first-floor rear extension, by reason of its flat-roof design, would fail to harmonise with the established character of the host dwelling and the surrounding area. It would be contrary to 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 Policies DMHD1 and DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

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 application site has a PTAL rating of 2, indicating very poor accessibility to public transport.

The nearest bus stop is located approximately 400-500 metres from the site and provides services to the local town centre. The proposal includes retention of two off-street parking spaces within the front garden area.

As the London Plan (2021) does not provide specific parking standards for Houses in Multiple Occupation (HMOs), the parking requirements fall to Hillingdon Local Plan Part 2: Development Management Policies, Appendix C. These standards require:
- 1 car parking space per 2 occupants (up to 6 occupants); and
- 1 cycle parking space per occupant.

On this basis, the proposed HMO would require 3 off-street parking spaces. Furthermore, as per the Highway Authority comments, the applicant has failed to demonstrate that the two parking spaces to be retained can physically be accommodated, accessed safely, or used without obstruction. Therefore, the proposed parking arrangement would be unworkable, unsafe, and contrary to adopted Hillingdon standards. For these reasons, the proposed development would effectively have zero onsite car parking. As the site is not located within a Controlled Parking Zone (CPZ), it is highly likely that all the additional vehicles generated by the development would overspill onto the public highway.

The section North Avenue where the application site locates has a very narrow carriageway that effectively functions as a single-lane road, requiring vehicles to pull over to allow oncoming traffic to pass. As a result, available kerbside space is already in high demand, and any additional on-street parking would further obstruct vehicle movements and exacerbate existing highway safety concerns. Furthermore, the high number of existing dropped kerbs along the street significantly reduces the amount of usable kerbside space for parking, meaning that any displaced demand arising from this proposal is likely to intensify parking stress and adversely affect the operation of the highway.

Without any robust parking survey to demonstrate otherwise, the proposal could lead to increased parking stress, obstruction, and associated harm to highway safety and residential amenity.

Given that the application is recommended for refusal on various reasons as discussed in other sections of the report, an independent parking stress survey has not been sought from the applicant. Therefore, the proposal, in its current form, would likely result in a increase in on-street overspill parking which would have an unacceptable impact on highway safety and amenity contrary to Paragraphs 116 and 117 of the NPPF 2024; Policies T2 and T4 of the London Plan 2021 and Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan Part 2 Development Management Policies.

A secure cycle store for 6 bikes (one for each HMO occupant) would be provided within the rear garden. While the proposed cycle storage capacity is considered reasonable for a 6-person HMO, there would be no external side access connecting the proposed cycle storage, meaning cycles would need to be carried through the internal living spaces to reach the storage area. This arrangement is contrary to the London Plan (Policy T5) and the London Cycle Design Standards (LCDS), which require cycle parking to be convenient, accessible, and easy to use, avoiding arrangements that require cycles to be moved through internal rooms or narrow corridors.

Therefore, the proposed cycle storage, in its current form, would be contrary to the London Plan Policy T5 (cycling) and LBH Policy DMT5 (cycling) and the London Cycle Design Standards. In the event of an approvable scheme, a condition would be imposed to secure details of cycle storage fails to meet the required accessibility, usability, and inclusivity standards.

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 6-bedroom HMO with a shared communal kitchen. Each bedroom is provided with an en-suite bathroom, and the internal room sizes are as follows:

Bedroom 1 - 10.3 sqm (plus en-suite)
Bedroom 2 - 10.4 sqm (plus en-suite)
Bedroom 3 - 10.3 sqm (plus en-suite)
Bedroom 4 - 11.7 sqm (plus en-suite)
Bedroom 5 - 10.6 sqm (plus en-suite)
Bedroom 6 - 10.7 sqm (plus en-suite)
Shared Kitchen - 12.3 sqm

The individual bedroom sizes would generally offer reasonable accommodation for single occupancy. However, the communal kitchen, at 12.3 sqm, would be the only shared internal facility. The scheme does not provide a shared living or dining space.

While HMOs are not subject to the minimum internal communal space standards of the London Plan or Hillingdon Local Plan, reference can be made to the Housing Design Standards LPG (2023)

as a useful benchmark for assessing functional layouts. Under this guidance, a 4-bedroom, 6-person (4B6P) dwelling would require a minimum of 31 sqm for combined living, dining and kitchen (LDK) space. In contrast, the proposed 12.3 sqm kitchen intended to serve six residents is significantly below what would normally be considered adequate for shared occupation. This raises concerns regarding the functionality, comfort, and sociability of the communal environment.

The absence of any shared lounge or dining area is likely to result in future occupants spending the majority of their time within their individual bedrooms, with limited opportunities for social interaction. This is contrary to the NPPF's requirement (Paragraph 135(f)) to promote health, well-being, and inclusive living environments. Given the Council's ability to manage the form and quality of HMO accommodation delivered in the borough, ensuring appropriate communal facilities is critical to securing good quality of life and avoiding isolating or substandard living conditions.

All bedrooms would benefit from windows with northeast or southwest orientation, allowing for natural light, ventilation and outlook. However, Unit 3 would directly adjoin the communal rear garden without any defensible space in front of their window. As a result, there would be a high likelihood of direct overlooking from occupants using the garden, leading to a material loss of privacy for those rooms.

This privacy impact is exacerbated by the absence of a shared lounge within the property. Occupants would be more likely to use the rear garden as a space for socialising, intensifying the level of activity immediately outside the window of Unit 3. The resulting arrangement is considered harmful to the residential amenity of this room and contrary to Policy D3 of the London Plan (2021), which requires that development safeguards appropriate privacy, outlook and amenity.

For the reasons set out above, the proposed development would fail to provide adequate internal amenity for future occupiers. The scheme conflicts with Policies D3 and D6 of the London Plan (2021), Policies DMH 5 and DMHB 16 of the Hillingdon Local Plan: Part 2 (2020), and Paragraph 135(f) of the National Planning Policy Framework (2024). The undersized communal kitchen, lack of internal shared living space, and poor privacy conditions for Unit 3 collectively result in unacceptable living conditions and do not meet the required standards for high-quality residential accommodation.

EXTERNAL AMENITY SPACE

Policy DMHB 18 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) requires all new residential development to provide good quality and useable private amenity space. In accordance with Table 5.3 houses with four bedrooms are required to have at least 100 square metres of private outdoor amenity space.

Whilst there is no prescribed standard for HMOs in Policy DMHB18, the proposed development would retain approximately 170sqm of rear garden area. The rear garden would be accessible via the communal kitchen on G/F. Such provision is considered sufficient for the proposed 6-person HMO.

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

North Avenue whilst 1 registered HMO are recorded on St Mary's Road. 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 proposal fails to comply with Policy DMH5 (iv) given that the accommodation would fail to comply with all other planning standards relating to car parking, waste storage and will have a detrimental impact upon the residential amenity of adjoining properties.

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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