



Appeal Decision

Site visit made on 12 May 2025

by **S Burch BSc MSc MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 12 June 2025

Appeal Ref: APP/F5540/W/25/3360119

Edelweiss, Strafford Road, Hounslow TW3 3EN

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
- The appeal is made by Mr Evans Harrington against the decision of the Council of the London Borough of Hounslow.
- The application Ref is P/2024/3370.
- The development proposed is described as 'Change of use from Dwellinghouse (C3) to a HMO (C4) for up to 6 people.'

Decision

1. The appeal is dismissed.

Preliminary Matters

2. The case officer report references an emerging local plan. The decision notice however only cites policies from the adopted Local Plan. The Council are therefore not seeking to rely on any emerging local plan policies. Whilst emerging local plan policies are material considerations, they are not determinative in this instance. I have determined the appeal accordingly.

Main Issues

3. The main issues are:
 - whether or not the existing property is suitable for conversion with particular regard to floorspace; and
 - the effect of the proposal on parking provision and highway safety.

Reasons

4. The appeal site relates to an existing detached two storey dwelling on Strafford Road. The site is located close to the junction with Bath Road. Surrounding development comprises mainly residential properties, of differing sizes and styles.
5. The proposal is for the conversion of a dwelling into a House of Multiple Occupancy (HMO) for up to 6 people. Legislation usually allows the change of use of dwellinghouses (Use Class C3) to small HMOs (Use Class C4) without planning permission. However, in September 2023, the Council made an Article 4 Direction to prevent this change of use.
6. Policy SC10 of the London Borough of Hounslow Local Plan 2015 – 2030 (LP) sets out the Council's approach to HMOs, Hostels and Bed and Breakfast accommodation. This policy recognises that HMOs are a responsive and flexible part of the range of housing provision and sets out to support this type of

accommodation where a number of criteria are met. The LP is supported by the London Borough of Hounslow Houses in Multiple Occupation Supplementary Planning Document (SPD).

7. Amongst other criteria, Criterion (e) of Policy SC10 states that the development should have a minimum 'original' floor area greater than 130 square metres (sqm) to be suitable for conversion. The SPD provides further reasoning for criterion (e), outlining how the size requirement is to resist the loss of smaller family dwellings and, ultimately, to maintain a good balance and mix of housing in response to what is described as a 'pressing need' for smaller units. The Council outline how the property's original floor area does not meet the threshold, and therefore there is an in-principle objection to the proposal.
8. The submitted Design & Access Statement outlines how the existing internal area of the property is 155 sqm over the ground, first and loft floor levels. It is however evident that this figure includes additional floor space granted through extensions including side dormers. The original floor space, prior to any extensions, did not meet the minimum threshold and this is accepted by the appellant in the submitted statement of case. The supporting text to Policy SC10 is clear that the conversion of properties that only achieve a total floorspace of more than 130 sqm because of previous or proposed extensions will not be supported. Consequently, I find that the original property is not in excess of the required 130 sqm and the proposal would not accord with the requirements of Policy SC10 in this regard.
9. The appellant states that although the proposal does not meet the minimum threshold, the scheme satisfies the aims and objectives of Policy SC10. They explain that the policy seeks to avoid an over concentration of HMO uses and following an examination of the planning register and HMO license register, within a catchment area of one mile from the appeal site, it was found that a negligible number of properties benefit from planning permission or an HMO license. As such, they explain that the registers' confirm that the pressure for, and presence of, HMO uses within the area surrounding the appeal site is inconsequential and the proposal would not contribute to an over concentration of HMO uses. They also state that the wider area has an ample supply of small family homes and therefore the proposal would not result in a loss of small family housing.
10. Whilst paragraph 5.30 of Policy SC10 does state that the Council will consider the cumulative impact of the proposal together with other similar developments in the surrounding area upon residential amenity and character, the policy also seeks to resist the loss of smaller family dwellings. Although the appellant is of the position that there is an ample supply of family homes in the area, I am not satisfied that there is sufficient evidence before me to demonstrate that this is the case.
11. Given the above, I see no reason to accept a lower original floor area and non-compliance with the policy in this instance. The original floor area is below that required by Policy SC10 and given this, the appeal scheme would result in the unacceptable loss of a small dwelling.
12. For the reasons set out above, I find that the property would not be suitable for conversion as the original floor space is less than 130 sqm. The proposal is therefore unacceptable in principle and would be contrary to LP Policy SC10 and the SPD.

Parking and highway safety

13. The appeal site is located on a residential road within a largely residential area. A controlled parking zone (CPZ) operates along Strafford Road. This restricts on-street parking to permit holders between 9am-5pm Monday to Fridays and 9.30am-12.30pm on Saturdays. The appeal site has a public transport access level (PTAL) of 4, indicating a good level of accessibility.
14. Policy EC2 of the LP applies London Plan car parking standards. London Plan Policy T6 sets out that car free development should be the starting point for all development proposals in places that are well-connected by public transport. There is no dispute between the main parties that the appeal site benefits from good levels of accessibility. Policy T6.1 of the London Plan outlines the maximum residential parking standards for dwellings and flats. No specific standards for HMO's are provided.
15. The case officer report states that according to Census data from the MSOA, the proposed development has the potential to generate an average of 0.26 car parking spaces per room (x6). It then goes on to state that given the location of the development, it should be car free. The appellant states that the parking requirement for the proposed use would be 1.56 spaces. Based on the conflicting evidence before me, I cannot be sure of the precise parking requirement of the scheme. Nonetheless, I have assessed what is shown on the plans before me.
16. The proposed scheme would provide two off-street car parking spaces to the front of the site. It was evident on my site visit that there is a full height kerb to the front of the site and on street parking bays partially in front of the site. There was also a car parked in one of these bays, partially obstructing the front of the site on my site visit. Given this, the two proposed off-street parking bays would conflict with the on-street bays and would likely result in the loss of on-street parking bays, if allowed. This would affect the availability of parking spaces within the area, potentially impacting the efficient operation of the transport network. The proposed spaces would also result in the crossing of a footway which would raise additional highway safety concerns.
17. On my site visit, the on-street parking along Strafford Road was well used, although there were a limited number of spaces available. I do recognise that my observations are only a snapshot of the conditions at the time of my visit, late-morning/early-afternoon on a typical weekday, but given the built-up residential nature of the area and its proximity to the town centre, I have no reason to believe that what I saw is not representative. It is also likely that there would be an increased parking demand in the evenings and at weekends at times when the CPZ is not in operation and the loss of on-street spaces would increase this demand.
18. The off-street spaces are shown as existing on the submitted plans. The Council's evidence outlines that the two spaces do not benefit from an approved vehicular access and crossover. The appellant however states that whilst the two on-site spaces are not recognised, images of the frontage of the site, dating back to 2014, exhibit hardstanding and the removal of the boundary wall to allow for vehicle access. No images or further evidence to demonstrate this has however been submitted. In any instance, the presence of hard standing to the front of the site does not confirm an approved vehicular access and crossover at the site.

19. The appellant states that the proposal's impact on car parking would be commensurate with its lawful use as a single dwelling. They go on to state that the scheme would generate a significant reduction in parking compared to the existing use, outlining how the table in Policy T6.1 of the London Plan advocates a parking provision of 0.5 to 0.75 spaces per bedroom for the existing dwelling, equating to between 2.5 and 5.75 spaces. This is however not correct; the table specifies a provision of 0.5 to 0.75 spaces per dwelling for a dwelling with 3 or more bedrooms.
20. In any instance, as outlined above, from the evidence before me, it has not been demonstrated that the existing use benefits from an approved vehicular access and crossover. The scheme would likely result in the loss of on-street parking bays and would result in the crossing of a footway to access the spaces. This would be detrimental to parking provision and highway safety.
21. The sites proximity to Hounslow Town Centre and access to public transport links does not outweigh the harm that I have identified above.
22. Given the above, the proposal has failed to demonstrate that it would not have an unacceptable impact upon on-street parking conditions in the area or prejudice the safe and efficient operation of the Local Transport Network. The scheme would be contrary to LP Policy EC2 and London Plan Policies T6 and T6.1. Collectively, amongst other matters, these policies expect new development to avoid adverse impacts on the transport network and not prejudice highway safety.

Other Matters

23. The scheme would have no detrimental impact on the living conditions of neighbours or the character and appearance of the area. It would comply with fire safety standards and provide cycle parking. It would meet the Council's standards for HMO's in terms of space and occupancy and the National Minimum Space Standards. However, these are neutral factors and do not weigh in favour of, nor against, the appeal.
24. The site is situated within flood zone one and the appellant has advised that the scheme would result in a significant financial commitment to improve the building. The site is located within a sustainable location with good access to local facilities. It would also result in some additional accommodation in the form of smaller units for which the appellant outlines there is increased demand for. These considerations however do not outweigh or justify the harm that I have identified above.
25. It is stated that the unit has been vacant for two years, with the appellant explaining that the property is too large for one couple and not suitable for a family due to its proximity to a busy road or junction. There is however limited evidence, such as marketing information, to confirm this is why the property has been vacant. I have therefore attached little weight to this consideration.
26. The appellant states that Policy SC6 of the LP requires family housing to be provided at ground level, which the building cannot achieve and therefore fails this policy, demonstrating that the building is not suitable for family housing. The scheme however results in the loss of a smaller family dwelling. This does not outweigh or justify the harm identified.

27. A copy of an appeal decision at 2a Strafford Road has been submitted alongside the appeal. The scheme however sought permission for a rear extension. It is therefore not directly comparable to the scheme before me, which seeks permission for a change of use.

Conclusion

28. The proposal conflicts with the development plan and the material considerations do not indicate that the appeal should be determined other than in accordance with it. Therefore, for the reasons given above, I conclude that the appeal should be dismissed.

S Burch

INSPECTOR