



Appeal Decision

Site visit made on 4 August 2025

by F P Tinsley MA (Hons) MBA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 17 September 2025

Appeal Ref: APP/F5540/W/25/3367479

88A Crispin Road, Feltham, TW13 6QR

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr Ivan Borudzhiev against the decision of the Council of the London Borough of Hounslow.
 - The application reference is Ref: P/2025/0741
 - The development proposed is described as 'conversion into 2 flats.'
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. The planning application form states that development had commenced at the time the application was submitted and the Council dealt with it retrospectively. During my site visit, I observed that the works applied for were substantially complete. I have therefore determined the appeal on the basis that the development has already taken place.
3. Prior to division of the building into two flats, it accommodated a single two storey dwelling.

Main Issues

4. The main issues in this case are:
 - The suitability of the property for conversion from a single dwelling to 2-flats with regard to the floor area of the original dwelling and living conditions for future residents.
 - The effect of the proposed development on highway safety with particular reference to car and cycle parking provision.
 - The effect of the proposed development on carbon dioxide emissions.

Reasons

Suitability of the property for conversion

5. Policy SC6 of the Hounslow Local Plan 2015–2030 (the Local Plan) states that to be considered suitable for conversion or subdivision, a property must have a minimum original internal net floor area of 130 square metres. While there is some

disagreement regarding the precise floor area of the original dwelling, the main parties agree that it was less than 130 square metres.

6. Local Plan Policy SC6 also requires that conversions include at least one family-sized dwelling, defined as a two-bedroom, four-person unit or larger at ground floor level. In addition, London Plan Policy D6 and Local Plan Policy SC5 apply the minimum internal space standards set out in the Nationally Described Space Standards (NDSS) to all residential conversions. According to the NDSS, a two-bedroom, four-person unit must have a minimum internal area of 70 square metres. The NDSS also requires a minimum of 5 square metres of private outdoor space for one- to two-person dwellings, with an additional 1 square metre for each extra occupant.
7. There is a dispute regarding the exact size of the ground floor unit. Even if I accept the larger figure of 67.7 square metres, this still falls just short of the NDSS requirement. The inclusion of storage space in an outbuilding does not resolve this shortfall, as such space is required to be integrated within the unit itself. While it is argued that the property is unsuitable for traditional family use due to the lack of outdoor space, its former use as an office, and its relationship to car parking, I am not persuaded by this reasoning, as no compelling evidence has been provided to support this assertion. Furthermore, a non-family-sized dwelling would also require adequate private outdoor space.
8. The first-floor flat measures approximately 43 square metres, which falls short of the NDSS requirement of 61 square metres for a two-bedroom, three-person dwelling. The appellant proposes reclassifying Bedroom 2 as a study to address this issue. However, I am not satisfied that retaining this as a separate room and simply reclassifying it as a study resolves the shortfall. A mechanism for achieving this would be a planning condition, which would not meet the requirements set out in paragraph 57 of the National Planning Policy Framework (the Framework), specifically in terms of enforceability. This is because there would be no practical way of preventing this room being used as a bedroom. Therefore neither of the units meet the standards set out in the NDSS. As such, the dwelling fails to comply with Local Plan Policy SC6 and Policy SC5.
9. Regardless of the external constraints cited by the appellant, namely the backland location of the site, its former use as an office, and its proximity to a busy 'A' road, these factors do not justify the shortfall in internal floor space. The site is located in an area characterised by family homes.
10. Bedroom 1 in the ground floor unit has two roof lights but no wall-mounted windows. The appellant proposes the installation of a high-level window in the twin bedroom to address this issue. While an additional high-level window would improve illumination, it would not enhance the outlook from the room, which would be detrimental to the living conditions of future occupiers. Although such a solution might be acceptable in the context of attic rooms, I have not been presented with a compelling argument that it would be appropriate in this case.
11. There is a compact outdoor area located to the front and side of the dwelling, which currently accommodates several outbuildings, parking area and an amenity area. It is proposed that this space will serve as private outdoor amenity space for the dwellings, as well as accommodate waste and recycling storage, cycle parking,

and car parking for two vehicles. However, no information has been provided to demonstrate how much of this space would be available for external amenity use.

12. The appellant suggests that a site plan could be submitted pursuant to a condition attached to a planning permission to indicate how this space would be provided. However, based on the information currently available, I am unable to determine whether adequate external amenity space could be achieved within the site and therefore whether living conditions for future occupants would be adequate. Given the fundamental nature of this concern to the acceptability of the development, I do not find a planning condition to be an acceptable mechanism to resolve this issue.
13. For these reasons, the development is not suitable for conversion into two dwellings and would be harmful to the living conditions of future residents. It is therefore contrary to Local Plan Policies SC5 and SC6, and London Plan Policy D6, which, among other things, set out acceptable standards for internal floorspace and outdoor amenity provision in residential developments.

Car and Cycle Parking Provision

14. London Plan (2021) Policy T4 states that development proposals should not increase road danger. Policies T5, T6, and T6.1 set out minimum cycle parking and maximum car parking standards for residential development. Local Plan Policy EC2 further requires that developments avoid adverse impacts on the transport network and provide a minimum number of cycle parking spaces, along with an appropriate maximum number of car parking spaces, consistent with London Plan standards.
15. The appeal site has a Public Transport Accessibility Level (PTAL) of 2, which supports the justification for on-site car parking provision. The appellant proposes that two parking spaces would be appropriate to serve the two flats and notes that there is comparable parking provision in the surrounding area, including on Crispin Road. However, no information has been provided to demonstrate how two on-site car parking spaces could be accommodated, including access and egress requirements. The appellant has also pointed to the availability of on street parking in the vicinity of the site, however this is located some distance from the appeal site due to its backland location, and I am not satisfied that occupiers of the dwellings would utilise this parking option and would instead seek to park on site.
16. These spaces would need to be provided within the area adjacent to the dwellings, which, as noted, is compact and also proposed to accommodate private amenity space, waste and recycling storage, and cycle parking. I am not satisfied that it would be possible to provide appropriate and safe on-site parking in this area, given the need to accommodate these other facilities and the risk of a conflict between cars and pedestrians in such a constrained space. The evidence of on-street parking availability before me is little more than a snap-shot in time, which is insufficient to persuade me this would provide an acceptable alternative.
17. The appellant suggests that a site plan could be submitted pursuant to a condition attached to a planning permission to indicate how this could be achieved. For the same reason given under the previous main issue, I am not satisfied this fundamental concern could be adequately addressed via condition. In reaching this conclusion, I note paragraph 116 of the Framework, which states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety.

18. For these reasons, I conclude that the development would have a harmful effect on highway safety, with particularly reference to car and cycle parking provision. It is therefore contrary to London Plan Policies T4, T5, T6, and T6.1, as well as Local Plan Policy EC2.

Carbon Dioxide Emissions

19. Local Plan Policy EQ1 requires development proposals to meet the carbon emission reduction requirements set out in the London Plan. While the sustainability statement submitted with the application states that the development would achieve a 35% reduction in CO₂ emissions against the baseline of Building Regulations Part L, no Standard Assessment Procedure (SAP) report has been submitted to detail the energy rating of the dwellings. As a result, the energy performance of the flats cannot be determined.
20. In the absence of evidence to the contrary, the development would fail to appropriately minimise carbon dioxide emissions and is therefore contrary to London Plan Policy SI 2 and Local Plan Policy EQ1. Although the appellant suggests that this matter could be addressed through a planning condition, it would not be appropriate to grant planning permission without evidence demonstrating that this policy requirement can be addressed.

Other Matters

21. The development does result in some benefits. It is argued that it would provide an additional housing unit and a form of accommodation suitable to address local demand for smaller family homes, aligning with planning policy objectives to deliver more housing. While the creation of one additional dwelling makes a modest contribution to housing supply, this carries only limited weight and does not outweigh the concerns regarding the property's suitability for conversion, nor the absence of necessary information to assess potential harm associated with other aspects of the development.
22. The absence of harm to the living conditions of surrounding occupiers has also been highlighted as a benefit, along with the fact that only minor external alterations are proposed to facilitate the conversion, and that there would be no impact on trees. Additionally, there is potential to secure a biodiversity net gain through landscaping, which could be delivered as part of the development. This aligns with Local Plan Policy GB7 and London Plan Policies G6 and G7. However, the absence of harm in these respects is not a tangible benefit that weighs in favour of the development; rather, it is an expected outcome in accordance with local and national planning policies.

Conclusion

23. For the reasons given above, I find that the development conflicts with the development plan when it is read as a whole, and other relevant considerations do not indicate that a decision contrary to the development plan should be reached. I therefore conclude that the appeal should be dismissed.

F P Tinsley

INSPECTOR