

Appeal Decision

Site visit made on 16 September 2025

by **B Astley-Serougi BA(Hons) LLM MSc MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 23 October 2025

Appeal Ref: APP/F5540/W/25/3368159

107 Tachbrook Road, Feltham, Hounslow TW14 9PD

- 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 Girish Gowda of Omnia SPV LLP against the decision of the Council of the London Borough of Hounslow.
 - The application Ref is P/2024/4005.
 - The development proposed is change of use from 6-Bedroom HMO (Class C4) to a 9-Bedroom HMO – 9 Person (Sui Generis).
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. The Council has referred to an emerging Hounslow Local Plan 2020-2041 (the ELP) at examination. However, I have not been provided with the ELP and given its stage, I have determined this appeal with reference to policies from the existing development plan.

Main Issues

3. The main issues are:
 - whether the appeal site is a suitable location for a house in multiple occupancy (HMO); and
 - the effect of the proposed development on the living conditions of neighbouring occupants with regard to noise and disturbance.

Reasons

Suitable Location

4. Number 107 Tachbrook Road (No 107) is located in a predominantly residential area. The appeal scheme would result in a 9-bedroom HMO which constitutes an increase of 3-bedrooms from the existing 6-bedroom HMO. It does not benefit from on-site parking. However, the appeal scheme would provide a new secure cycle shelter in the rear garden in addition to the existing store for approximately 10 bicycles.
5. Policy SC10 of the London Borough of Hounslow Local Plan 2015-2030 (the HLP) outlines that HMO's are a responsive and flexible type of accommodation

and contribute to meeting the needs of individuals and families within the Borough. It further outlines that HMO's should be within a convenient walking distance of town centre facilities and good public transport links. Given the subjective nature of these terms and the need for consistency in decision-making, the supporting text to the Policy provides more detailed definitions, saying a reasonable walking distance is considered to be 400 metres.

6. Furthermore, the London Borough of Hounslow Houses in Multiple Occupation Supplementary Planning Document 2017 (the SPD) provides additional guidance in relation to this policy, stating that they should be located where there is a Public Transport Accessibility Level (PTAL) of 4 as well as within a 400m walk of town centre facilities, such as Feltham town centre. This is not an unreasonable approach given that residents of HMO's may be on low incomes.
7. The appeal site is within PTAL 1b. It therefore is not classified as having 'good' access to public transport and indeed it falls far below the PTAL4 standard given in the policy's supporting text. Feltham Train station and Hatton Cross Underground Station are approximately 965m and 1.3 miles from the appeal site respectively. The appellant outlines that a reasonable walking distance could be considered to be 1 mile (1.6km) given that the Chartered Institution of Highways and Transportation's 'Planning for Walking' 2015 and the National Travel Survey 2023 (updated April 2025), outline that around 80% of journeys of up to 1.6km are undertaken on foot.
8. I have identified above that the supporting text of Policy SC10 highlights that a reasonable walking distance is considered to be 400m and the guidance in the SPD also refers to 400m. Therefore, whilst I acknowledge that the Department for Transport LTN 1/04 – Policy Planning and Design for Walking and Cycling highlights that commuter journeys that are considerably greater are not uncommon, this does not equate to a convenient walking distance as defined in the HLP. Consequently, in this case, it is reasonable to my mind, to consider a convenient walking distance to be around 400m.
9. I acknowledge that there are bus stops located in the surrounding area including on Engleheart Drive which is around a four-minute walk from No 107. However, given the absence of sufficient information in the evidence before me regarding the frequency of the bus service to these bus stops as well as the routes they take, there is limited substantive evidence to adequately demonstrate that they would provide a satisfactory alternative to the requirement of facilities in a convenient walking distance as outlined in Policy SC10 of the HLP nor accord with the detailed guidance in the SPD.
10. The parties do not agree, in the evidence before me, on the distance of the appeal site to Feltham Town Centre. The Council refer to an approximate distance of 1.2km whilst the appellant gives a distance of around 0.8km to the Feltham Town Centre Boundary. Nevertheless, even if the distance is approximately 0.8km this remains significantly greater than the 400m cited in the supporting text of Policy SC10 and the SPD. Although these distances may be achievable by bicycle, the HLP and SPD are clear that it should be within a convenient walking distance. Consequently, it does not, in my judgement, justify a HMO in this location.

11. I note that the appellant refers to facilities located on Cassiobury Avenue which is around 400m from the appeal site and includes a parade of local shops including a food market. However, to my mind and based on the evidence before me, there is limited substantive evidence to demonstrate that they provide the same level of facilities as those that can be expected in a town centre. Accordingly, there is limited evidence before me to adequately demonstrate that there is an equivalent level of facilities to town centre facilities within convenient walking distance of the appeal site.
12. The appellant has provided information regarding other HMO's in the locality of No 107 and I am satisfied that the appeal scheme would not result in a saturation of HMOs in the surrounding area. Nevertheless, this does not alter my conclusions regarding the relationship of the appeal site and the distance from town centre facilities as well as its PTAL classification.
13. A 6-bedroom HMO can be achieved via permitted development rights as outlined in the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) without any regard to its relationship to services. Consequently, the existing use of No 107 as an HMO does not justify the appeal scheme given that express permission for an HMO over 6 bedrooms is required.
14. I have taken into account a recent appeal decision at No 107 for what was substantially the same development as before me now. Although dismissed on noise grounds, the Inspector accepted there would be no conflict with Policy SC10 of the HLP as they found the site would be a convenient walking distance from town centres and there would be good public transport facilities.
15. However, I am unclear as to why that previous Inspector opted to depart from the clear definitions in the supporting text. Therefore, even if I take into account that decision, I have no evidence before me to put aside the primacy of the development plan and definitions of these matters that it contains, especially given the site falls so far below the standards in the policy concerning public transport access and proximity to town centre facilities. Consequently, whilst I recognise the importance of consistency, in this instance, I consider that the previous decision does not offer me a basis for reaching different findings.
16. In conclusion, the appeal site is not a suitable location for an HMO and therefore conflicts with Policy SC10 of the HLP insofar as it seeks to ensure that HMO's are in appropriate locations and in convenient walking distance of town centre facilities.
17. It is for the same reasons that the appeal scheme would fail to accord with the guidance outlined in the SPD.
18. The appellant refers to Policies GG2, D3 and H9 of the London Plan 2021 (online version). Whilst these are not referred to in the Council's Decision Notice, given my reasoning above, the appeal scheme would also conflict with these policies insofar as they seek to ensure developments make the best use of land and are sited in appropriate locations.

Noise and Disturbance

19. I have identified above that a 6-bedroom HMO is able to operate from No 107 via permitted development rights. The appeal scheme would introduce an additional 3 bedrooms to the existing 6-bedroom HMO. This would likely increase the coming and goings above those expected from a single-family dwelling house given that residents in an HMO live as separate households.
20. The appellant has provided a Noise Impact Assessment dated November 2024 (the NIA), a Noise, Disturbance and Antisocial Behaviour Procedure (the NDAP) as well as a Management Plan for No 107. The Management Plan outlines that the responsibility for managing the appeal scheme would be by Apollo Housing.
21. The NIA summarises that the impact of the appeal scheme is expected to be limited but that this is dependent on adherence to the recommended noise management plan. It recommends, amongst other things, limiting the use of the garden and amplified music indoors to daytime hours (07:00 – 23:00), that amplified music should not be permitted in outdoor areas as well as signs to be placed in the garden space reminding and requesting residents to consider neighbouring occupants. In my judgement, these measures would be sufficient to prevent unacceptable harm to the living conditions of neighbouring occupants regarding noise and disturbance.
22. The NDAP focuses mainly upon anti-social behaviour however there is reference to minor noise pollution and frequent noise pollution. It requires that the maximum time limit for Apollo Housing's Anti-Social Behaviour Team to contact the complainant and start the investigation to be within 5 and 3 working days respectively. Consequently, the appeal scheme has, to my mind, sufficient mechanisms to respond to any complaints. It does not to my mind rely solely upon the selection of candidates. Furthermore, safeguards are available through other legislation to protect neighbouring occupants from nuisance.
23. Given that No 107 is a detached dwelling and based on the evidence before me in the form of the NIA, NDAP and the Management Plan, the appeal scheme would not, to my mind, result in unacceptable harm to the living conditions of neighbouring occupants regarding noise and disturbance. It would therefore comply with Policies SC10 and EQ5 of the HLP insofar as they seek to ensure that developments do not result in unacceptable noise and disturbance.
24. It is for the same reasons that the appeal scheme would fail to accord with the SPD.

Other Matters

25. Concerns regarding health, highway safety, inadequate cycle provision and privacy have not been included as putative reasons for refusal by the Council or statutory consultees. Based on the evidence before me I find no reason to disagree.
26. The appeal scheme would contribute to the mix of housing tenure within the Borough. Given it is small scale this attracts modest weight.

Conclusion

27. The appeal scheme would not result in unacceptable harm to the living conditions of neighbouring occupants regarding noise and disturbance and it would contribute to the mix of housing tenure in the Borough. Nevertheless, for the reasons given above the appeal scheme would not be located in a suitable location. Consequently, the proposal conflicts with the development plan as a whole and the material considerations do not indicate that the appeal should be decided other than in accordance with it. For the reasons given above the appeal should be dismissed.

B Astley-Serougi

INSPECTOR