




**LOGIC
PLANNING**

Planning Statement

8 Strelley Way, Acton, London, W3 7AR

Mr Eric Josseron

Approved for issue		
Lorenzo Pandolfi		19/10/2023

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1 INTRODUCTION AND EXECUTIVE SUMMARY

- 1.1 This Planning Statement has been prepared by Logic Planning on behalf of the Applicant, Mr Eric Josserson, to accompany a planning application seeking consent for the retention of 8 Strelley Way, Acton as a 10-bedroom House in Multiple Occupation (HMO) under the Sui Generis classification. This Statement should be read in conjunction with the accompanying plans and other supporting information submitted alongside the application.

- 1.2 The application property comprises a semi-detached residential building located within a highly sustainable, established residential area. The property has been utilised as a HMO for a considerable period of time. The Applicant purchased the application property in July 2023 and having had sight of a HMO licence associated with the application property, considered the use as an established, lawful use.
- 1.3 Since then however, the Applicant has been contacted by the Local Authority's Enforcement Officer notifying that planning permission has not been granted for the use of the property as a 10-bedroom HMO and that consent would be required for its continued use. The Applicant in no way sought to deliberately circumvent the planning system but was merely ill-informed and now seeks to work proactively with the Local Planning Authority (LPA) to regularise the development.
- 1.4 HMOs play an important role in UK housing supply as they provide affordable and flexible living accommodation such as for professionals, students and overseas workers. The on-going well-documented cost-of-living crisis coupled with an acute shortage of homes means that the demand for HMO accommodation has notably increased in recent years.
- 1.5 Whilst it is noted that the application property has been subject to an Enforcement Notice (LPA ref no. 20EN0069) and a subsequent appeal dismissal (Appeal Ref: APP/A5270/C/20/3248644), it should be noted that Appeal Ref: APP/A5270/C/20/3248644 was assessed alongside Appeal Ref: APP/A5270/C/20/3248637 which related to the adjoining property (no.7 Strelley Way) also being utilised as a 10-bedroom HMO and the Inspector's assessment was based on a combined impact of both properties being utilised as HMO accommodation.
- 1.6 It is the Applicant's understanding that the use of 7 Strelley Way as a 10-bedroom HMO has now ceased and so the merits of the application proposal ought to be assessed in light of this, given that this application relates solely to the use of No.8 only as a HMO. Moreover, the scheme being presented has been revised and this submission includes additional justification for the proposed development regarding its compliance with local and national planning policy, more details of which will be set out in subsequent sections of this Statement.
- 1.7 Much has changed since the issuing of Enforcement Notice ref no. 20EN0069, namely the introduction of the new London Plan (2021) which recognises the important contribution that HMOs make to London's housing provision, the Covid-19 global pandemic and its subsequent lockdowns, a cost of living crisis and the worsening of the affordable homes shortage in London and the consequential upturn in the number of homeless. In addition, the Council is well underway in preparing a new Local Plan which promotes a wide range of homes for all in society.
- 1.8 HMOs can provide accommodation for single people on modest to low incomes. Research from 'Ideal flatmate', a UK room-share platform, has looked into the ratio of nurses, paramedics and doctors - employed by the UK's National Health Service (NHS) - who are required to flat share in order to afford rental properties within reaching distance of the hospital in which they work. It is estimated that 20% of nurses, paramedics and doctors working in the NHS in London reside in HMO accommodation¹. The application site is located just 1-mile from Queen Charlotte's and Chelsea Hospital as well as Hammersmith Hospital and the property is a clearly suitable means of accommodation for those employed in the NHS.

¹ "Doctors and nurses are the most sought-after flatmates, poll finds"
-<https://www.independent.co.uk/student/student-life/accommodation/doctors-and-nurses-are-the-most-soughtafter-flatmates-pollfinds-a6986161.html>

- 1.9 The property is considered to be within a suitable location for the nature of the accommodation being provided; readily accessible, particularly on foot and by public transport and well connected to retail, employment and public services provision. More details of the merits, acceptability and policy compliance of the proposed development will be set out subsequently as well as references made to a number of similar developments permitted within the local authority in recent years.
- 1.10 This Statement will show that the proposed retention of the HMO is acceptable and complies with local and national planning policy whilst bringing about a number of other benefits. The following sections describe the site and its surroundings and the proposed development. The relevant local and national planning policy context is then set out before an assessment of the proposal. The Statement concludes that planning permission should be granted.

Structure of statement

- 1.11 This Statement includes the following sections:
- Section 2 describes the Site and its surrounding area;
 - Section 3 summarises the planning history of the Site and of other sites of relevance;
 - Section 4 provides an overview of the redevelopment proposal;
 - Section 5 sets out the planning policy framework and material considerations of relevance for the Site;
 - Section 6 assesses the proposal against detailed policy considerations; and
 - Section 7 sets out the Conclusions.
- 1.12 This Planning Statement should be read in conjunction with the following documents:
- Existing and Proposed Plans (by Windsor Patania Architects)
- 1.13 This Statement includes a review of the planning history of the site, analyses the physical context of the development and demonstrates that the proposal would comply with the relevant planning policies of the local development framework.

2 SITE AND SURROUNDINGS

The Site

- 2.1 The application property comprises a semi-detached residential building located within the urban boundary as per the adopted proposals map and within an established residential area. The accommodation is arranged over three floors, providing a total of ten bedrooms and has been operating as HMO for a considerable period of time.



Figure 1. Application property

Surrounding Area

- 2.2 The site is within a highly sustainable location just off the A40, close to shops, local services and education provision. The nearest bus stop is located along the A40, a high frequency bus corridor and is located a three-minute walk from the site. Most properties within the vicinity feature driveways and there is generous on-street parking in the vicinity. The site is also within a Controlled Parking Zone (CPZ). It has a PTAL rating of 4, which suggests moderate-good connectivity,



Figure 2. The site is located within a highly sustainable, readily accessible location

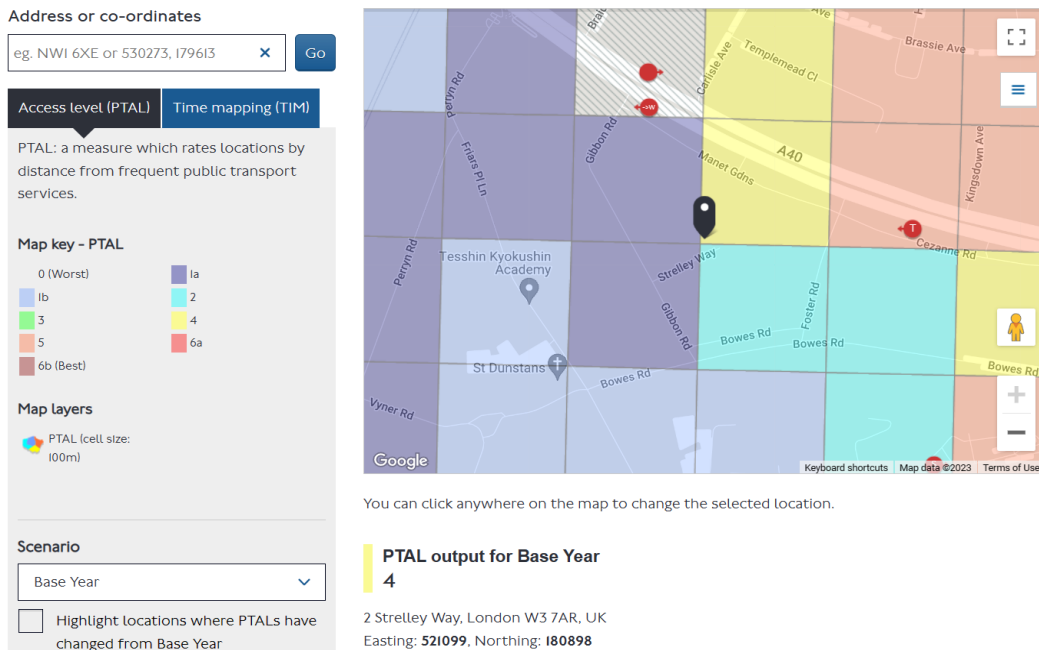


Figure 3. The site is close to an area with PTAL rating of 4 which suggests moderate-good connectivity

3 PLANNING HISTORY

Application Site

- 3.1 As previously set out, the application property has been subject to an Enforcement Notice (LPA ref no. 20EN0069) referring to an unauthorised use of the property as a HMO alongside the use of the adjoining property (no.7) for the same purpose. A subsequent appeal was dismissed (Appeal Ref: APP/A5270/C/20/3248644). Appeal Ref: APP/A5270/C/20/3248644 was assessed alongside Appeal Ref: APP/A5270/C/20/3248637 which related to the adjoining 7 Strelley Way which was also being utilised as a 10-bedroom HMO and the Inspector's assessment was based on a combined impact of both properties being utilised as HMO accommodation.
- 3.2 The Inspector found that the use of no.7 and no.8 as 10-bedroom HMOs would have a significant adverse effect on the living conditions enjoyed by adjoining occupiers due to an 'intensification' of the use of both properties. Moreover, an accumulation of bins associated with the use of both properties as HMOs was cited. In addition, the Inspector noted the pressure for additional car parking associated with the use of both properties as HMOs would likely exacerbate parking congestion. At the time of the appeal, there was no suitable secure cycle parking included within the scheme.

Other sites of relevance

- 3.3 LPA ref no. 210120FUL was granted consent in 2021 for the change of use of a single dwellinghouse (Use Class C3) into a Large House in Multiple Occupation (HMO) comprising 8 bedrooms for 13 persons (Use Class Sui Generis) at 368 Church Road, Northolt, UB5 5AR. The property and its surroundings are similar to the application property.



Figure 4. 368 Church Road, Northolt

3.4

LPA ref no. 214698FUL was granted consent in 2021 for the change of use of a property (Use Class C3) into a Large House in Multiple Occupation (HMO) comprising nine bedrooms (Use Class Sui Generis) at 93 York Road, Acton.



Figure 5. 93 York Road Acton

4 PROPOSED DEVELOPMENT

- 4.1 Consent is sought for the retention of 8 Strelley Way, Acton as a 10-bedroom House in Multiple Occupation (HMO) under the Sui Generis classification. As per the accompanying plans, the proposal includes 10 no. single occupancy bedrooms, each with an en-suite bathroom, with accommodation arranged over three floors.

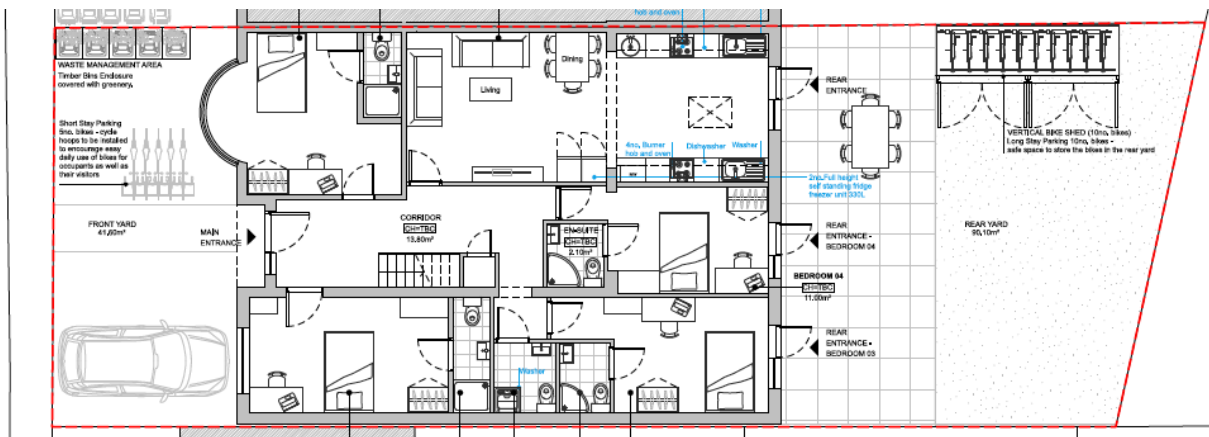


Figure 6. Proposed ground floor (not to scale)

- 4.2 The proposed site layout plan indicates the location of a cycle stand and bin store at the front of the property, alongside an existing parking space which is to be retained. To the rear of the property is a secure cycle store. It should be noted that all rooms will be CPZ "permit-free".
- 4.3 The proposed accommodation schedule is as follows:

Accommodation Schedule		
10no. Bedrooms 10no. Occupants 10no. En-Suites		
Rooms	Proposal (m ²)	Standard (m ²)
Combined area*	31.00 m ²	kitchen - min 5 m ² / 5 occupants
Kitchen 02	9.00 m ²	
Bedroom 01	13.00 m ²	6.51 m ²
Bedroom 02	14.00 m ²	6.51 m ²
Bedroom 03	12.00 m ²	6.51 m ²
Bedroom 04	11.00 m ²	6.51 m ²
Bedroom 05	15.00 m ²	6.51 m ²
Bedroom 06	14.00 m ²	6.51 m ²
Bedroom 07	13.00 m ²	6.51 m ²
Bedroom 08	15.00 m ²	6.51 m ²
Bedroom 09	14.00 m ²	6.51 m ²
Bedroom 10	12.00 m ²	6.51 m ²

*Kitchen-Dining-Living

5 PLANNING POLICY FRAMEWORK

- 5.1 In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the development plan, unless other material considerations indicate otherwise.

Development Plan

- 5.2 The statutory development plan for the Site includes the following documents:

- Ealing Core Strategy DPD (April 2012)
- Development Management DPD (December 2013)
- The London Plan (2021)

- 5.3 The following policies of the Core Strategy are considered to be of relevance:

- Policy 1.1 Spatial Vision for Ealing 2026 (a) By 2026, the Council aims to provide 14,000 additional homes.

- 5.4 The following policies of the Development Management DPD are considered to be of relevance:

- Policy 3B states that special residential accommodation (dwellings that differ in form or occupation from normal housing) will be supported where it meets the identified needs of a specific local group and satisfies the amenity objectives of the plan (including impacts on residential amenities arising from the over-concentration of uses in a particular area).
- Policy 7B provides that new development must achieve a high standard of amenity for users and for adjacent users. In particular, Policy 7B states that "new development must achieve a high standard of amenity for adjacent users by ensuring high quality architecture, good levels of daylight and sunlight, good levels of privacy, coherent development of the site, appropriate levels of development on site, positive visual impact, and legibility and accessibility".
- Policy LV7.4 seeks to ensure that residential development is respectful of the surrounding built form in terms of its street sequence, building pattern, dimensions, scale, bulk and appearance.

- 5.5 The following London Plan (2021) policies are considered to be of relevance:

- Policy D3 of the London Plan states that development proposals should "enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions".
- Policy D6 requires that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space.
- Policy H1 aims to optimise the potential for housing delivery on all suitable and available brownfield sites.
- Policy H9 promotes the efficient use of existing stock and aims to make the best use of land by following a design led approach that optimises the capacity of sites.

- Policy H9 recognises the value of HMO's in meeting local and strategic housing needs.
- Policy H12 supports the delivery, retention and refurbishment of supported and specialised housing which meets an identified need.
- Policy T5 requires cycle parking to be provided for all new development.
- Policy T6 indicates that car-free development should be the starting point for all development proposals in places well-connected by public transport.
- Policy SI7 of the London Plan (2021) requires the design of developments to include adequate, flexible, and easily accessible storage space and collection systems.

5.6 The Council's adopted *Standards for Houses in Multiple Occupation* SPD (2016) is also of relevance. According to the document, HMOs should provide:

- Bath/shower rooms at a ratio of 1:5 persons;
- A WC within each individual occupancy or, when not practical, shared WCs at a ratio of 1:5 persons;
- 50% of the shared WCs to be in a room separate from a bath/shower room;
- 6.5 sq m of floor area within single units of accommodation without separate cooking facilities;
- 10.2 sq m of floor area within double units of accommodation without separate cooking facilities;
- Each occupancy with its own kitchen separate from, but on the same floor as, the sleeping room;
- Shared kitchens may be provided for up to 5 persons per set of facilities;
- A minimum of 5 sq m for each set of kitchen facilities and no more than two facilities per any kitchen;
- Kitchens and rooms containing kitchen facilities to be ventilated directly to the outside air by a window, the openable area of which shall be equivalent to at least 1/20th of the floor area; where this is not practicable mechanical ventilation must provide for a nominal one air change per hour.

Other Material Considerations

National Planning Policy Framework

5.7 The Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework (NPPF) in February 2019. Paragraph 12 of the NPPF confirms that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. Paragraph 60 of the NPPF states:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed..."

5.8 Paragraph 62 of the NPPF states:

"Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes."

5.9 Para 102 stresses the importance of development proposals addressing transportation issues at an early stage in a development in order to identify the potential impacts of a proposal and look at opportunities to reduce them together with promoting more sustainable methods of transport. Para 103 states that the planning system should actively manage patterns of growth in support of these objectives, focusing on locations that will limit the need to travel offering a genuine choice of travel modes, with the overall aim being to reduce congestion and emissions. Para 105 states that planning policies should support an appropriate mix of uses across an area, and within larger scale sites, minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.

6 PLANNING ASSESSMENT

6.1 This Section examines the key planning considerations associated with the proposed development and assesses the planning merits of the proposed development against relevant national and local planning policy and guidance. In undertaking this assessment, consideration has been given to the policies of the adopted development plan and the National Planning Policy Framework.

6.2 The key considerations to be discussed within this section of the Statement are:

- The principle of the development, having regard to the provisions of the adopted Development Plan and national planning policy and guidance;
- The effect of the development on residential amenity;
- The effect of the development on the character and appearance;
- The effect of the development on the local highway network.

6.3 Each of these matters is considered below.

The principle of development

6.3 HMOs play an important role in UK housing supply as they provide low cost and flexible accommodation, particularly for professionals, students and workers from overseas.

6.4 Policy H1 of The London Plan (2021) aims to optimise the potential for housing delivery on all suitable and available brownfield sites and Policy H9 promotes the efficient use of existing stock.

6.5 This is supported by London Plan Policy D3 which aims to make the best use of land by following a design led approach that optimises the capacity of sites. Policy H9 of the London Plan (2021) recognises the value of HMO's in meeting local and strategic housing needs. Policy H12 of the London Plan 2021 supports the delivery, retention and refurbishment of supported and specialised housing which meets an identified need.

6.6 Ealing's Development Management Document DPD Policy 3B states that special residential accommodation (dwellings that differ in form or occupation from normal housing) will be supported where it meets the identified needs of a specific local group and satisfies the amenity objectives of the plan (including impacts on residential amenities arising from the over-concentration of uses in a particular area).

6.7 The property has operated as a HMO for a considerable period of time. The Applicant considers the site as an ideal location for a HMO insofar as it is in a readily accessible location and within walking distance of shops, local services and areas of employment. HMOs can provide accommodation for single people² on modest to low incomes.

6.8 Research from Ideal flatmate, the UK room share platform, has looked into the ratio of nurses, paramedics and doctors - employed by the UK's National Health Service (NHS) - who are required to flat share in order to afford rental properties within reaching distance of the hospital in which

² The number of people living alone in the UK has increased by 8.3% over the last 10 years; in 2021, the proportion of one-person households ranged from 25.8% in London to 36.0% in Scotland. Office for National Statistics (<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2021>).

they work. It is estimated that 20% of nurses, paramedics and doctors working in the NHS reside in HMO accommodation.

- 6.9 The need to provide new residential accommodation to meet the needs of professionals and smaller households is recognised at all levels, especially during times of chronic under supply of homes and a cost-of-living crisis. The proposed shared living accommodation would be an effective response to this need. The Council prioritises the supply of all forms of housing including private, housing associations and Council homes. The Council endeavours to provide a supply of housing for those on all income levels, and a mix of sizes and types to meet a range of needs.
- 6.10 The private market is becoming increasingly unaffordable for many of Ealing's existing and potential residents and the demand for affordable housing is rising, especially among young professionals. As a result, there are many households who are unable to find a home they can afford. The proposal would help the Council in meeting the housing demand of its working-age population and would increase the offer of tailored, high-quality and affordable residential accommodation in a sustainable location.
- 6.11 Permitting the proposal would not result in the loss of a family dwelling insofar as the property has not been a single occupancy C3 dwelling for many years and its physical layout reflects this.
- 6.12 Moreover, a planning history search of Strelley Way shows that there have been no HMO conversion schemes permitted in the vicinity and observations indicate that most of the surrounding properties appear to fall within C3 occupancy.
- 6.13 Permitting the scheme would in no way contribute towards an overconcentration of HMOs in the locality, thus compliant with DPD Policy 3B.
- 6.14 On this basis, the proposal receives support from the development policies of the adopted development plan and the NPPF advises that proposals which accord with the development plan should be approved without delay.
- 6.15 The NPPF instructs that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole or its specific policies indicate development should be restricted. The scheme will clearly deliver beneficial sustainable development that should be granted planning permission and it will not result in any adverse impacts that would significantly and demonstrably outweigh the benefits of its approval. This is confirmed in the following assessment of the detailed material considerations relevant to the scheme.

The effect of development on residential amenity

- 6.16 The site has long operated as a HMO providing an acceptable quality living arrangement and the Applicant seeks to further enhance the living accommodation on offer. The proposed internal layout provides occupants with good quality living accommodation with each habitable room benefiting from good levels of natural daylight, privacy and a satisfactory outlook.
- 6.17 As per the accompanying plans, the accommodation is set over three floors and each bedroom benefits from having a private en-suite bathroom, in line with the aspirations of the Council's adopted Standards for Houses in Multiple Occupation SPD (2016). As such, the Council's bath/shower rooms at a ratio of 1:5 persons are well-exceeded.
- 6.18 The large kitchen / dining room features two kitchen facilities which are considered sufficient for the number of occupants whilst the bedroom sizes also exceed the Council's standards.
- 6.19 In addition to generous sized private amenity space at the rear of the property, there are plentiful parks, footpaths, and open spaces nearby as shown overleaf. Proximity to such spaces contributes to good overall well-being.
- 6.20 The level of accommodation will comply in full with the guidance set out in the Council's adopted Standards for Houses in Multiple Occupation SPD (2016).



Figure 7 - The application site is a short walk away from a large recreational park and other open spaces -
Source: Google map

- 6.21 The quality of HMO accommodation is high and it meets internal space standards, and this is reflected in the granting of a HMO licence following a full assessment of the property's suitability for HMO provision.
- 6.22 In terms of neighbour impact, the property has long operated as a HMO without known detriment to the living conditions of adjacent occupiers. Whilst it is noted that the application property has been subject to an Enforcement Notice (LPA ref no. 20EN0069) and a subsequent appeal dismissal (Appeal Ref: APP/A5270/C/20/3248644), it should be noted that Appeal Ref: APP/A5270/C/20/3248644 was assessed alongside Appeal Ref: APP/A5270/C/20/3248637 which related to the adjoining property (no.7 Strelley Way) also being utilised as a 10-bedroom HMO and the Inspector's assessment was based on a combined impact of both properties being utilised as HMO accommodation. It is the Applicant's understanding that the use of 7 Strelley Way as a 10-bedroom HMO has now ceased and that the merits of the application proposal ought to be assessed in light of this, given that this application relates solely to the use of no.8 only as a HMO.
- 6.23 A planning history search also shows no other HMO conversion applications being permitted within the vicinity. Permitting the proposal would not result in an 'overconcentration' of such uses.
- 6.24 The quality of HMO accommodation is considered above average and so it is in the Applicant's interests to ensure that the property is well managed with residents being subject to relevant reference and security checks. The Management of the property also oversees regular inspections to ensure that routine maintenance is being undertaken, and that the property is kept in a good condition externally and internally.
- 6.25 The Applicant operates a number of successful HMOs in London and operates a stringent vetting process to ensure only tenants with suitable references are able to reside at the property. The Applicant's properties are inspected regularly and have a zero tolerance towards anti-social behaviour. The tenancy agreement requires prospective tenants to adhere to maintaining the property in an orderly manner whilst not engaging in anti-social behaviour or creating undue noise and two character-references are required before entering into the tenancy.
- 6.26 The LPA granted consent for LPA ref no. 210120FUL in 2021 for the change of use of a single dwellinghouse (Use Class C3) into a Large House in Multiple Occupation (HMO) comprising 8 bedrooms for 13 persons (Use Class Sui Generis) at 368 Church Road, Northolt.
- 6.27 The property and its surroundings are very similar to the application property given that it comprises a semi-detached property in a suburban area.
- 6.28 In addition, the LPA granted consent for LPA ref no. 214698FUL in 2021 for the change of use of a property (Use Class C3) into a Large House in Multiple Occupation (HMO) comprising nine bedrooms (Use Class Sui Generis) at 93 York Road, Acton. Again, the property in this instance is located in a predominantly residential area comprising family housing, similar to the application property.
- 6.29 Like the two examples, it is expected that the application property can accommodate a HMO without detriment to adjacent occupiers.
- 6.30 For these reasons, permitting the proposal will align with the objectives of Policy 7B of the Development Management DPD.

The effect of development on the character and appearance of the area

- 6.31 The proposals include very minor changes to the external area, namely the inclusion of a screened bin store to the front alongside a secure cycle store.
- 6.32 At the time of the previous appeal, concern was raised owing to the cumulative siting of bins associated with the use of both properties as HMOs.
- 6.33 In response, this scheme includes a screened bin store which is well designed and which will adequately screen bins to safeguard the street scene.
- 6.34 The proposed development will have a negligible impact on the character and appearance of the immediate setting and the Inspector's previous concerns are considered to have been adequately addressed.
- 6.35 Permitting the proposal will align with the requirements of Policy D3 of the London Plan or Policy 7B of the Development Management DPD.

The effect of the development on the local highway network

- 6.36 Policy T6 of the London Plan (2021) indicates that car-free development should be the starting point for all development proposals in places well-connected by public transport. The site is conveniently located within a readily accessible, sustainable location and can be accessed by rail, bus, bicycle and on foot. The site has long operated as a HMO with no known adverse impacts to the functioning of the local highway network. Given the nature of accommodation being provided, car ownership amongst those residing at the property would be low, which is common for occupants of HMO accommodation.
- 6.37 The previous scheme did not feature a secure cycle store whereas adequate provision has now been made for. To encourage a modal shift to more sustainable forms of transportation, Policy T5 of the London Plan (2021) requires cycle parking to be provided for all new development. This does not specify minimum standards for HMO development within the sui generis use class however the proposed cycle store provision within the scheme is considered to be adequate for the nature of the occupancy.
- 6.38 As previously set out, the site has a PTAL rating of 4 which suggests moderate-good connectivity and is within a highly sustainable location just off the A40, close to shops, local services and education provision. The nearest bus stop is located along the A40, a high frequency bus corridor and is located a three-minute walk from the site. Neighbouring properties feature driveways which reduces the need for on-street parking.
- 6.39 The site is also within a Controlled Parking Zone (CPZ) and all rooms will be 'permit free' thus not adding any additional pressure on local parking demand. An existing off-road parking space will also be retained.

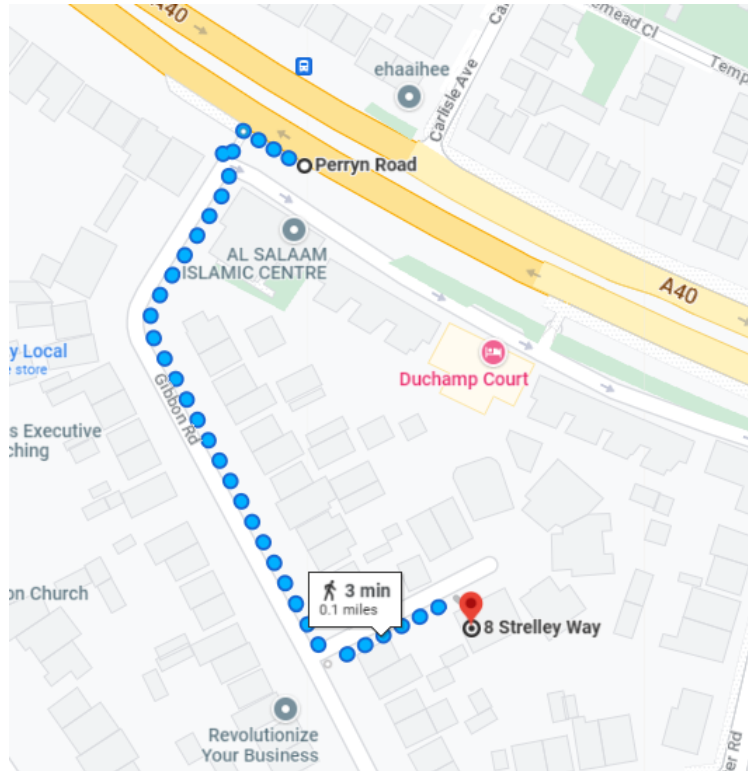


Figure 8. The nearest bus stop is located along the A40, a high frequency bus corridor and is located a three-minute walk from the site

6.40 As mentioned above, the LPA granted consent for LPA ref no. 210120FUL in 2021 for the change of use of a single dwellinghouse (Use Class C3) into a Large House in Multiple Occupation (HMO) comprising 8 bedrooms for 13 persons (Use Class Sui Generis) at 368 Church Road, Northolt. The application property is considered to be within a more readily accessible location than 368 Church Road.

6.41 The Case Officer's remarks for application ref. no. 210120FUL are of note:

"The site is located on an arterial road and has a PTAL Score of 0, which suggests poor public transport accessibility, however the application site is adjoining a PTAL Score of 2. There are bus stops within walking distance of the application site, which provides connections throughout Ealing and also to the Northolt Underground Station."

"Overall, the proposal does not raise any specific concerns with regard to transport or highway safety".

6.42 In addition, the LPA granted consent for LPA ref no. 214698FUL in 2021 for the change of use of a property (Use Class C3) into a Large House in Multiple Occupation (HMO) comprising nine bedrooms (Use Class Sui Generis) at 93 York Road, Acton. 93 York Road is located in a predominantly residential area comprising of family housing, similar to the application property yet was found acceptable from a highways perspective.

6.43 We invite the Council to adopt a pragmatic approach in assessing the application proposal in light of the recent approvals for HMOs in similar circumstances described above.

7 CONCLUSIONS

- 7.1 This Statement has set out the merits and acceptability of the proposed retention of a 10-bed HMO at 8 Strelley Way, Acton. The use has operated successfully for several years and now more than ever there is clearly a need for the type of affordable and flexible living accommodation being provided. The proposal would clearly enhance the living accommodation on offer and the application should be viewed in the context of a chronic shortage of affordable housing. The development proposal is clearly policy compliant as demonstrated and provides an affordable and a convenient place to live. In the event that permission is not forthcoming, ten of the Borough's residents will be required to seek alternative living arrangements amidst a chronic undersupply of homes.
- 7.2 The proposal receives support from the development policies of the adopted development plan and the NPPF advises that proposals which accord with the development plan should be approved without delay. The NPPF instructs that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole or its specific policies indicate development should be restricted. The scheme will clearly deliver beneficial sustainable development that should be granted planning permission.
- 7.3 The NPPF states that local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development. It goes on to state that local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible.
- 7.4 For the reasons set out, the LPA is kindly requested to grant planning permission.