

## Planning Statement

76 Kingsway  
Enfield  
London  
EN3 4HT

19<sup>th</sup> March 2024

### Re: Change of use to small HMO (Class C4)

Dear Sirs,

We have been requested by our client to submit an application for the following development:

**'Change of use from single dwelling (Class C3) to 5-bed HMO (Class C4) for up to 5 occupiers, together demolition and re-build of existing single storey rear extension. Provision of cycle and refuse storage.'**

Accordingly, this statement is accompanied by existing and proposed drawings prepared by Redwoods Projects.

The planning application fee of £578.00 will be paid online.

### **Site and Surrounding**

The subject site consists of a two-storey terrace dwelling located on Kingsway. The property has been previously extended by way of a single storey rear extension. The street is predominantly characterised by similar terraced properties in residential use.

The site has a PTAL of 3 which is relatively low.

The application site is neither listed nor is it located in a Conservation Area.

### **Planning History**

No planning history has been identified.

## **Proposed Development**

The application is for the change of use from an existing dwelling (Class C3) to a 5-bed HMO (Class C4), together with alterations and re-build of an existing single storey extension. The HMO will be occupied by a maximum of 5 people.

Cycle storage will be provided at the rear, whilst refuse storage will be provided at the front.

## **Planning Policy**

The development plan consists of the following documents:

- National Planning Policy Framework (2023)
- London Plan (2021)
- Enfield Core Strategy (adopted November 2010)
- Enfield Development Management Document (adopted November 2014)

Careful consideration has also been given to the following:

- Enfield Council HMO Standards (2021).

## **Planning Considerations**

### **Principle of Development**

The NPPF (2023) and London Plan (2021) advise that local authorities should seek to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. In addition, they advocate the efficient use of brownfield sites provided that it is not of high environmental value. Policy 5 of the Core Strategy seeks to ensure that new developments offer a range of housing sizes to meet housing needs whilst ensuring that the quality and character of existing neighbourhoods is also respected.

Policy DMD 5 of the Development Management Document (DMD) (2014) stated that the conversion of existing units into houses of multiple occupation will only be permitted where developments:

A. Provide a high-quality form of accommodation.

B. Do not harm the residential character of the area or result in an excessive number or clustering of conversions. The number of conversions:

- Must not exceed 20% of all properties along any road; and
- Only 1 out of a consecutive row of 5 units may be converted.

C. Do not lead to an unacceptable level of noise and disturbance for occupiers and adjoining properties; and

D. Incorporate adequate parking and refuse storage arrangements.

The proposed HMO has been carefully designed to meet and exceed the Council’s relevant HMO standards. A detailed discussion of the quality of accommodation follows in the paragraphs below.

In reference to point B, we undertook a detailed survey of existing council tax records, as well as existing planning records. Accordingly, it is concluded that Kingsway is predominantly characterised by single family homes. The proposed development will therefore not exceed 20% of all properties along the road being converted, or more than one out a consecutive row of five units. These findings demonstrate that the proposed development will not have an undue effect on the character of the area by resulting in a clustering of conversions, in accordance with the limitations of policy DMD 5.

In addition to this, the proposed scheme will introduce an important alternative type of rented accommodation on Kingsway in accordance with the aims and objectives of the London Plan (2021), and the more local Core Strategy.

With regards to points C and D of Policy DMD 5, we confirm that the development will not lead to an unacceptable level of noise and disturbance and will pose no harm on transport and highway grounds. These points are further discussed in detail in the paragraphs below.

Overall, the principle of development is considered acceptable and in line with national and regional policy.

**Impact on Character and Appearance**

It is proposed to demolish and rebuild the existing single storey rear extension, albeit with some minor design changes. The proposed extension is considered to remain subordinate and sympathetic to the original building and will therefore pose no harm on character grounds.

**Quality of Accommodation**

Regard has been given to the Council’s HMO Standards (2021) when designing the proposed layout. For clarity, below is a breakdown of the internal residential provision:

Room	Size (m <sup>2</sup> )	En-suite
Bedroom 1	12.92	Yes
Bedroom 2	10.89	Yes
Bedroom 3	7.93	No (shared)
Bedroom 4	9.37	No (shared)
Bedroom 5	11.36	No (shared)
Kitchen/Living	14.4	N/A

The proposed HMO occupancy is for a maximum of five people. Each room will accordingly meet and exceed the minimum standard for a single room. The ground floor bedrooms (1 and 2) will benefit from private en-suite bathrooms, whilst bedrooms 3 to 5 will share a larger bathroom at first floor level. All rooms will be served by appropriate windows with good outlook and ventilation.

The proposed shared kitchen/living space will measure a total of 14.4m<sup>2</sup> thus complying with the relevant standards.

Access to a rear garden will also be provided for every future occupier. The rear amenity space of approximately 60m<sup>2</sup> will accord with the standards set out in policy DMD 9.

Overall, it is considered that the proposed HMO will provide an excellent standard of accommodation that will adequately serve future occupiers.

### **Impact on Neighbouring Amenity**

The use of the property will remain a residential, albeit not as one single household. Notwithstanding this, the proposed number of occupants (5) is not considered to result in a material increase in the potential occupancy of the application when compared to the existing 3-bed family dwelling, with a likely occupancy of 5 people. Whilst 5 occupants forming different households may generate additional activity such as the general coming and going of people and their visitors, it is considered that the scale of such activity in respect of noise disturbance or congestion would unlikely exacerbate impacts when compared to the existing arrangement.

In addition to the above, the new extension will not be materially deeper or taller when compared to the existing one, thus mitigate any harmful impacts towards neighbouring occupiers.

In light of the above, it is considered that the proposed development will pose no harm upon neighbouring residents.

### **Transport and Highways**

Policy DMD 45 stated that car parking proposals will be considered against the standards set out in the London Plan and:

- The scale and nature of the development;
- The PTAL rating of the site;
- Existing parking pressure; and
- Accessibility to local amenities.

For clarification, the application site has a PTAL rating of 3 meaning it has good access to public transport. It is located a 3-minute walk from Southbury Station, which is served by the London Overground line and provides fast connections into central London.

With regards to local amenities, the site is adjacent to a couple of local centres. Immediately north of the site, on the corner of Southbury Road, is a short parade of commercial premises forming the local centre of Southbury Road & Kingsway Road. To the east, the site is a 6-minute walk to Ponders End Local Centre, which offers a much larger variety of shops, restaurants, and other services.

Finally, with regards to open green spaces, the site is in proximity to Durants Park as well as Jubilee Park.

Table 10.3 relevant to Policy T6.1 of the London Plan (2021) notes that 3+ bedroom dwellings in outer London PTAL 3 require up to 1 parking space per dwelling.

The application site does not benefit from off-street parking, and the area does not fall within a Controlled Parking Zone. Accordingly, vehicle parking will be on-street. Notwithstanding this, it is important to consider the nature of the proposed development and the wider transport/highway facilities available.

Firstly, the existing 3-bed single dwelling with a potential occupancy of 5 people, could likely yield up to 2 x parking spaces as existing. These vehicles are parked on-street due to existing constraints.

The proposed development is expected to accommodate a total occupancy of 5 individuals. Therefore, it can be reasonably inferred that the development will not significantly intensify the use from an occupancy perspective. Moreover, considering the nature of Houses in Multiple Occupation (HMOs), which primarily cater to individuals with lower incomes and younger populations, it is sensible to anticipate a relatively lower rate of vehicle ownership among HMO occupants.

In addition to this, it has been demonstrated that the application site is in vicinity to a wide number of shops, services, as well as to quick access to public transport. Accordingly, it is anticipated that occupants will be more inclined to choose cycling or walking as a viable transport option. This, in turn, will foster the adoption of sustainable commuting methods, and subsequently decrease the necessity for frequent car or vehicle usage.

To conclude, despite not providing off-street parking spaces, the HMO development is not expected to adversely affect the current parking availability on Kingsway, owing to the reasons outlined above. Occupancy levels will remain unchanged, and the parking demand is projected to remain consistent with the existing use of the property as a 3-bed family home, with a maximum requirement of 2 parking spaces.

## **Conclusion**

The proposed development seeks to convert the existing C3 dwelling to a 5-bed HMO C4, with an occupancy of up to 5 people. The proposal will provide for an appropriate alternative use of the property for which there is an identified need for. The proposed use will be appropriate given the sustainable location of the site.

The proposed HMO unit has been designed to meet the Council's HMO standards and will provide an excellent form of accommodation. It will not lead to any material impacts upon neighbouring residents, or the local highway system.

In light of the above, and in the absence of identified harm, the proposal is considered to have planning merit and should be supported by officers.

Yours sincerely,

Redwoods Projects Ltd.