

## Planning Statement

***Retrospective application for the change of use of the property 10 Frobisher Road N8 0QS from a single-family dwelling (Use Class C3) to a small House in Multiple Occupation (Use Class C4) for up to four occupants.***



|                            |                            |
|----------------------------|----------------------------|
| <b>Site Location:</b>      | 10 Frobisher Road N8 0QS   |
| <b>Date:</b>               | 10 February 2026           |
| <b>Planning Authority:</b> | London Borough of Haringey |

## 1. Introduction

Homz has been instructed to submit a retrospective planning application seeking approval for the change of use of the property from a single dwellinghouse (Use Class C3) to a small House in Multiple Occupation (Use Class C4) for up to four occupants. No external alterations are proposed as part of this application.

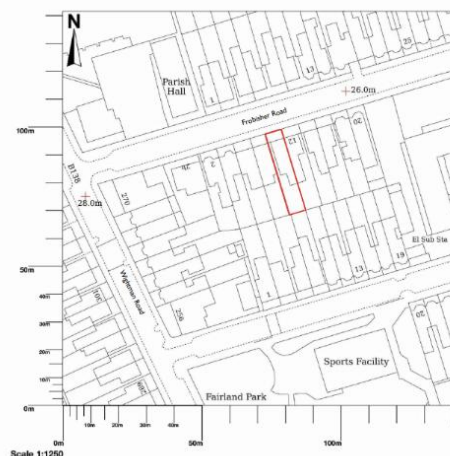
The applicant has provided all property related information confirming that the property is a three-storey, five-bedroom house that has evolved from the original two-storey dwelling via (i) a ground-floor side-return/ground-floor reconfiguration (2010) and (ii) a loft conversion (completed February 2021). The dwelling has been occupied as a small HMO for around two years by four unrelated professionals on a joint tenancy, with the top-floor bedroom currently vacant and all tenants having access to the loft en-suite.

The statement outlines the site, the description of development, the planning history, planning policy, material planning considerations and conclusion.

## 2. Site and Context Analysis

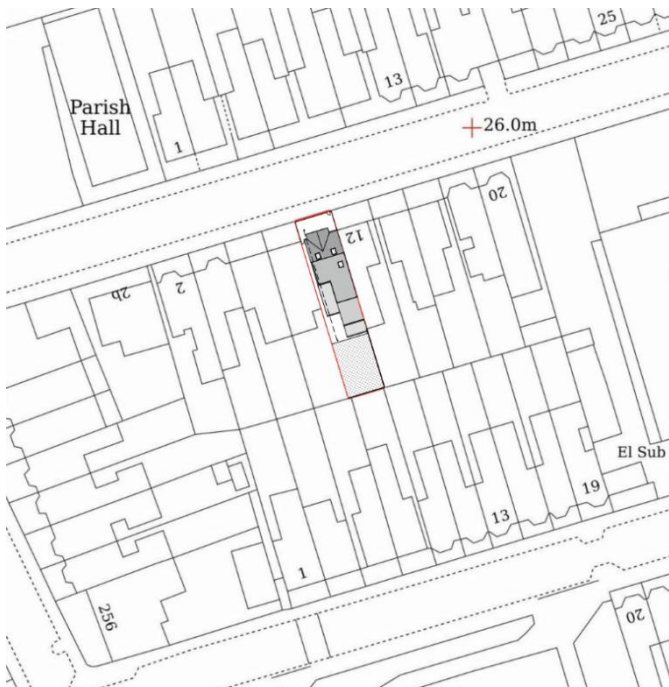
### 2.1 Location and surroundings

The application site lies within a predominately residential street with ready access to public transport, cycling and walking networks typical of this part of Haringey. The area is subject to an Article 4 Direction (effective 30 November 2013) removing permitted development rights for the change from C3 to C4 use. The site covers an area of 183.84m<sup>2</sup>, refer to drawing below for the site location:



## 2.2 Existing built form

The Existing Block Plan (Drawing No. H-0435-03, Rev V3, dated 21.01.2025) illustrates the property at 10 Frobisher Road, N8 0QS, shown at a scale of 1:500 at A3. The drawing outlines the red-line boundary of the application site as it sits within its surrounding urban context. The plan identifies the footprint of No. 10 and neighbouring buildings using Ordnance Survey base mapping. This shows the spatial arrangement of the dwelling in relation to adjoining plots along Frobisher Road. The plan includes the footprint of the main house and any attached structures as they currently exist on site. No alterations or extensions are identified beyond those already forming part of the built fabric. Refer to the existing block plan below:



## 3. Description of development

This application seeks retrospective planning permission for the change of use from a single dwellinghouse (Use Class C3) to a small House in Multiple Occupation (Use Class C4) occupied by up to four unrelated individuals. The use reflects the existing occupation of the property, which has been operating as a small HMO for approximately two years under a joint tenancy agreement. No external alterations to the building are proposed as part of this application, and the submission relates strictly to the regularisation of the current residential use. Internal works historically undertaken, such as the ground-floor reconfiguration, side return extension (2010), and loft conversion completed in 2021, are not included within the scope of this application and have been referenced solely to

explain the property's present layout. The proposal arises following advice from the Council's Planning Enforcement Team, who identified that planning permission had not previously been granted for the C4 HMO use and recommended submission of a retrospective application so the use can be formally assessed against Policy DM17 of the Haringey Development Management DPD and the relevant Article 4 Direction. The property continues to provide residential accommodation over three storeys with shared kitchen and bathroom facilities, and its current occupation level does not involve any intensification of built form or changes to its external appearance.

#### 4. Planning History

There is no planning applications associated with the property, only building control applications as a result of historical extension works.

*The Council's Planning Enforcement Team engaged with the property owners in July 2025, confirming that planning permission had not previously been granted for the use of the premises as a House in Multiple Occupation and requesting the submission of a retrospective planning application to enable a formal assessment of the proposal against Policy DM17 and other relevant development plan policies. The applicant has acted transparently throughout this process, and this application is submitted in good faith with the intention of regularising the existing use and associated operational arrangements of the property.*

#### 5. Planning Policy

##### National Planning Policy Framework (2024)

The National Planning Policy Framework (NPPF) (December 2024) sets out the Government's planning policies for England and is a material consideration in the determination of planning applications. The NPPF is clear that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

##### *Decision-Making Framework (NPPF Paragraphs 39–60)*

Chapter 4 of the NPPF emphasises that planning decisions must be taken in accordance with the development plan, and that the NPPF must be read as a whole when assessing proposals. These paragraphs reinforce the need for proportionate and evidence-based decision-making and support the principle that proposals such as HMO use should be assessed against the local authority's specific policy framework, including DM17 and the Article 4 Direction affecting changes of use from C3 to C4.

##### *Delivering a Sufficient Supply of Homes (NPPF Paragraphs 61–84)*

The NPPF requires local planning authorities to meet the housing needs of different groups within their communities, including those requiring different types and tenures of housing. Although HMOs are not referenced explicitly, this section supports the role of shared housing in meeting local needs, particularly for young professionals, lower-income residents, or those with limited access to self-contained accommodation. This aligns with the function of small HMOs in providing affordable and flexible housing choices within sustainable urban areas.

#### *Promoting Healthy and Safe Communities (NPPF Paragraphs 96–108)*

These paragraphs emphasise the importance of supporting safe, inclusive and healthy neighbourhoods. They require decision-makers to consider the potential for conflict between uses and ensure that development supports positive social interaction and avoids adverse impacts on residential amenity. In the context of a C4 HMO, these principles relate closely to managing cumulative impacts, avoiding over-intensification, and ensuring that the proposal does not give rise to unacceptable noise or disturbance, matters also reflected in DM17.

#### *Promoting Sustainable Transport (NPPF Paragraphs 109–118)*

The NPPF requires that development is located where sustainable transport modes can be maximised, and where it would not result in severe transport impacts. HMOs, which typically serve non-car dependent occupants and higher proportions of public transport users, are consistent with these objectives when situated in well-connected locations such as Frobisher Road. Proximity to services, walking and cycling routes, and public transport infrastructure is directly supported by this section.

#### *Making Effective Use of Land (NPPF Paragraphs 124–130)*

These paragraphs encourage the efficient and proactive use of existing land and buildings to meet identified housing needs while safeguarding the environment and securing safe and healthy living conditions. Reuse of existing housing stock for small-scale shared accommodation, without any external alterations aligns with the principle of optimising land within existing settlements, particularly where it delivers good-quality living standards consistent with licence requirements and policy DM17.

#### *Achieving Well-Designed Places (NPPF Paragraphs 131–141)*

This section focuses on ensuring high-quality design and secure, healthy living conditions for occupants. While no external works are proposed, these paragraphs remain relevant because they reinforce the need for good internal amenity, sufficient facilities, and appropriate management of shared accommodation to ensure dignified, safe and comfortable living conditions—core elements of HMO regulatory standards and central to the assessment of this proposal.

#### *Article 4 Direction Principles (NPPF Paragraph 54)*

Although not part of the main NPPF chapters summarised above, Paragraph 54 provides essential guidance on the use of Article 4 Directions, stating that such Directions must be based on robust evidence, applied only where necessary to protect local amenity and the well-being of an area, and must cover the smallest geographical area possible. This guidance underpins Haringey's Article 4 Direction removing permitted development rights for C3 to C4 changes of use, forming the policy framework within which this application must be assessed.

#### Development Plan (as relevant to the proposal)

Haringey Local Plan: Development Management DPD (adopted 24 July 2017)—Policy DM17: Houses in Multiple Occupation (criteria addressing original floorspace >120 m<sup>2</sup>, amenity impacts/cumulative impact, sustainable location, internal standards/amenity space/refuse, and kitchen space).

Haringey Local Plan: Strategic Policies (consolidated with alterations 2017)—borough-wide strategic housing policies and focus on safeguarding family housing where justified.

Other Material Considerations:

Article 4 Direction (C3→C4)—confirms that since 30/11/2013 planning permission is required for C3→C4 within designated wards, including Harringay/Bounds Green/Noel Park etc. The Council's guidance page and signed Direction are publicly available.

### **6. Material Planning considerations:**

The following considerations are considered material to the assessment of the change of use of the subject property:

- Principle of development
- Neighbour amenity/ cumulative impact
- Transport, access and parking
- Amenity for occupiers

#### **6.1 Principle of Development**

The proposal seeks retrospective planning permission for the change of use from a single dwellinghouse (Use Class C3) to a small House in Multiple Occupation (Use Class C4) for up to four occupants. The principle of the development must be assessed against, The Development Plan, including Policy DM17 (Houses in Multiple Occupation) of the Haringey Development Management DPD; The Article 4 Direction removing permitted development rights for C3 to C4 changes of use; The National Planning Policy Framework (NPPF), as a material planning consideration (December 2024).

Policy DM17 sets out specific criteria for assessing proposals for small HMOs within Article 4 areas, including, the original gross internal floor area must exceed 120 m<sup>2</sup>; The proposal must not give rise to adverse amenity impacts (including cumulative impacts); the site must be in an accessible location; the accommodation must achieve high internal standards, adequate facilities, and appropriate refuse arrangements.

The accompanying plans detail that the floorspace meet the 120 m<sup>2</sup>, plans indicate that the property was 124.50m<sup>2</sup> which excludes post-1948 extensions (a ground floor bathroom measuring 3.8m<sup>2</sup>). This confirms that the property falls within the category of dwellings potentially suitable for lawful HMO use under DM17.

The property is also located within an area covered by the Article 4 Direction, meaning the change of use requires full planning permission. The Direction applies to multiple Haringey wards, including Harringay and Bounds Green, and has been in force since 30 November 2013. The Direction's purpose supported by NPPF Paragraph 54 is to manage concentrations of HMOs and protect local amenity.

Given that the HMO use already exists and that the property meets the fundamental size criterion, the principle of development is acceptable, subject to detailed assessment of amenity, management, and local character impacts.

## **6.2 Neighbourhood Amenity / Cumulative Impacts**

Criterion DM17(b) requires an assessment of the proposed use to ensure that the HMO does not give rise to any significant adverse amenity impacts on the surrounding neighbourhood, including consideration of cumulative impacts arising from any over-concentration of HMOs within the area. The application property accommodates four occupants within a sizeable three-storey dwelling, representing a modest intensity of use.

The applicants report no complaints from neighbouring residents, and the property is noted to be well-managed, with tenants appropriately vetted and ongoing compliance with licensing requirements. Although the site lies within the Article 4 area, the limited occupancy, strong management standards, and absence of any recorded disturbance all weigh in favour of the proposal and indicate that the use does not generate harm of the type DM17(b) seeks to prevent.

## **6.3 Transport, Access and Parking**

The application site is located within a well-connected urban setting served by walking routes, public transport, and cycling infrastructure. This aligns with NPPF Paragraphs 109–118 on sustainable transport and criterion c of policy DM17.

Small HMOs typically generate low car usage, and no evidence indicates unacceptable parking pressure arising from the existing use.

## 6.4 Amenity for Occupiers

Policy DM17(d) requires that HMOs provide high-quality accommodation, meeting appropriate space standards, offering satisfactory levels of internal and external amenity, and ensuring adequate refuse and recycling provision. The submitted existing plans and HMO licensing evidence demonstrate that the property meets these requirements.

### *Internal Quality & Space Standards*

The existing drawings show a well-proportioned three-storey dwelling with five bedrooms of varying sizes, all exceeding the minimum space standards typically applied for HMO accommodation. For example:

- Bedroom 1: 20.2 m<sup>2</sup>
- Bedroom 2: 12.1 m<sup>2</sup>
- Bedroom 3: 12.2 m<sup>2</sup>
- Bedroom 4 (unoccupied) 15.8m<sup>2</sup>
- Bedroom 5- 11.2m<sup>2</sup>
- First floor bathroom- 6m<sup>2</sup>
- Loft en-suite bathroom- 4.2m<sup>2</sup>

The plans also confirm generous communal provision, including a living room/kitchen measuring 73.9 m<sup>2</sup>, offering ample shared space for four occupants and surpassing the typical HMO expectation for combined communal facilities.

These measurements, combined with the multi-storey layout and clear circulation areas, demonstrate that the internal environment is spacious, functional, and suitable for shared living, comfortably satisfying the intent of DM17(d).

Furthermore, the applicant has noted an HMO inspection (July 2025) described the property as “one of the best HMOs visited”, noting only minor remedial works. These minor remedial works have now been addressed and the property has been considered to be fully compliant (confirmed by HMO compliance officer at Haringey Council 19 January 2026). This provides independent confirmation of the high internal standards and good management of the accommodation.

### *Amenity Space*

The property benefits from a typical private rear garden, as illustrated in the block and elevation drawings. No intensification or external alterations are proposed, and the outdoor space remains suitable for the modest level of occupancy.

This provision accords with DM17's requirement to ensure a satisfactory level of amenity for occupants.

### *Refuse & Recycling Provision*

Refuse and recycling storage can be appropriately accommodated within the site boundary and can be secured by condition if necessary. This approach aligns with the Council's Sustainable Design and Construction SPD (Appendix A3) and HMO guidance, which require clear arrangements for bin storage, accessibility, and collection. The layout of the front and rear curtilage, as shown on the submitted plans, provides sufficient options for compliant refuse storage without harming amenity.

In summary, the combination of generous bedroom sizes and circulation areas; substantial communal living/kitchen space (73.9 m<sup>2</sup>); verified high management and housing standards; adequate external garden space and capacity for compliant refuse storage; demonstrates that the proposal fully satisfies DM17(d) and provides high-quality accommodation for four occupants, consistent with both local and national policy expectations.

### **Conclusion**

The retrospective change of use from a single dwellinghouse (Use Class C3) to a small House in Multiple Occupation (Use Class C4) for up to four occupants is considered acceptable in planning terms. The assessment demonstrates that the development complies with the key requirements of Policy DM17, including the original floorspace threshold, the need to safeguard residential amenity, the provision of high-quality internal accommodation, and the suitability of the site in terms of accessibility.

The submitted plans confirm that the property offers generous bedroom sizes, extensive communal space including and noteworthy 73.9 m<sup>2</sup> shared living/kitchen area and a layout across three floors that comfortably accommodates the modest occupancy level. The dwelling also benefits from a private rear garden, ensuring adequate amenity space.

The property is located within a highly accessible urban setting, consistent with the sustainable transport objectives of the NPPF (Paragraphs 109–118), and appropriate refuse and recycling arrangements can be secured by condition in line with the Council's Sustainable Design and Construction SPD.

Although situated within the Article 4 area, the proposal aligns with the purpose of the Direction, as it demonstrates that the HMO use does not undermine local amenity or

contribute to harmful over-concentration. The application has been submitted transparently and in good faith following engagement with the Council's Planning Enforcement Team.

In summary, the existing HMO use represents a well-managed, policy-compliant, and sustainable form of housing, making efficient use of the existing building and meeting identified needs without causing harm. The proposal therefore constitutes an acceptable form of development, and there are no policy grounds upon which planning permission should be withheld. Should the Planning Authority request any further information in order to process the planning application please contact Chadernnay Glenn at **Homz UK** (Chadernnay@homz.uk) directly as the acting agent and we will be more than happy to deliver any additional information as and when required.