
Planning Statement

Change of use from flats (C3) to HMO (C4) for up to 6 people.

108 The Avenue, London, N17 6TG

London Borough of Haringey

April 2026



Introduction

This planning statement is prepared on behalf of the applicant to submit a Full Planning application for the change of use to C4 HMO at 108 The Avenue in the London Borough of Haringey on behalf of Prestbury Property Investments Ltd. In support of this application, the following Planning Statement is submitted to demonstrate compliance with local and national planning policies.

Site Description

The site application is a two storey mid terraced property located on The Avenue. The property was converted into flats in 1979. The site is not in any conservation area nor is listed. The surroundings are residential in nature comprising of two storey Victorian terraces.

The dwelling has 4 bedrooms, each with their own en-suite over the ground floor, first floor and loft floor. There is a shared kitchen on the ground floor. The property benefits from a HMO Licence which is valid from 17.10.2023 - 16.10.2028.

Planning History

Application Reference	Proposal	Application Status	Site Address	Date Valid	Decision	Decision Notice Sent Date
<u>OLD/1973/0044</u>	Conversion into 2 self-contained flats.	Decision Made	108 The Avenue N17		Approve with Conditions	03/9/1973
<u>HGY/2025/0658</u>	Certificate of Lawfulness for the existing use of the property as a House in Multiple Occupation (HMO) for up to six residents (Class C4 Use).	Decision Made	108 The Avenue Tottenham London N17 6TG	25/3/2025	Refuse	15/5/2025
<u>HGY/2019/0678</u>	Conversion of ground and first floor flat into a single dwelling.	Decision Made	108 The Avenue London N17 6TG	13/2/2019	Approve with Conditions	09/4/2019

Proposed Development

The application is for the proposed change of use from flats (C3) to a 4 bedroom C4 small House in Multiple Occupation (HMO) with a shared kitchen.

Relevant Planning Policy Considerations

The following local and national planning policy and guidance is relevant to this application:

National Planning Policy Framework (December 2024)

- Section 1 – Achieving sustainable development

London Plan (March 2021)

- Policy GG4 – Delivering the homes Londoners need
- Policy SD6 – Town centres and high streets
- Policy D3 – Optimising site capacity through the design-led approach
- Policy D4 – Delivering good design
- Policy D5 – Inclusive design
- Policy D6 – Housing quality and standards
- Policy H8 – Loss of existing housing and estate redevelopment
- Policy H10 – Housing size mix
- Policy SI8 – Waste capacity and net waste self-sufficiency
- Policy T1 – Strategic approach to transport
- Policy T2 – Healthy streets
- Policy T5 - Cycling
- Policy T6 – Car parking

Haringey Development Management DPD (2017)

- DM1 Delivering High Quality Design (Haringey Development Charter) 10
- DM2 Accessible and Safe Environments 12
- DM3 Public Realm 12
- DM4 Provision and Design of Waste Management Facilities
- DM12 Housing Design and Quality
- DM16 Residential Conversions
- DM17 Houses in Multiple Occupation
- DM31 Sustainable Transport
- DM32 Parking

Material Considerations

The planning assessment will cover the following issues:

- Principle of the development
- Design and Impact on the character of the area
- Quality of accommodation
- Impacts to neighbouring amenity
- Sustainable transport

- Waste management

Principle of the Development

Development Management Development Plan Document (DPD) Policy DM17 (Houses in multiple occupation) states that the conversion of larger homes to Houses in Multiple Occupation (HMO), including small HMOs (3-6 unrelated people) within the area covered by the Article 4 Direction, will only be permitted where:

- a) The gross original internal floor space of the existing dwelling is greater than 120sqm;
- b) They do not give rise to any significant adverse amenity impact(s) on the surrounding neighbourhood, including cumulative impacts arising from an overconcentration of HMOs within an area;
- c) They are accessible by public transport, cycling and walking;
- d) They provide high quality accommodation that satisfies the relevant policies of the Local Plan, including internal space standards, provision of a satisfactory level of amenity space for occupants, and adequate and convenient refuse storage and collection; and
- e) Where non self-contained, have exclusive use of a kitchen or space within a shared kitchen for each household.

Policy SP2 (Housing) of the Haringey Local Plan 2017 states that the Council will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the minimum target of 19,802 homes from 2011-2026 (820 units per annum from 2011-2014 and 1,502 units per annum from 2015-2026).

It is considered that Policy DM16 which relates to residential conversions of larger homes into smaller self - contained flats where the original internal floor space of the dwelling is greater than 120sqm is not relevant as the proposal is not to convert the property into self-contained flats.

Under Policy DM17, the floor space requirement relates to the gross original internal floor space. The net original floor space is approximately 52sqm on the ground floor and 52sqm on the first floor and 30sqm in the loft floor, which is a total of 134sqm. The proposal would therefore comply with part (a) of Policy DM17 as it exceeds 120sqm.

Amenity, transport and space standards (parts b, c, d of Policy DM17) are assessed in the subsections below. The proposal will include non-self-contained bedrooms, which have an exclusive kitchen/ dining space on the ground floor as a shared facility for the household (part e of Policy DM17).

Policy DM17 aims to prevent residential conversions of small dwellings that would result in substandard living conditions for the occupants through inadequate floor space. Policy SP2 aims to meet Haringey's housing needs. In this instance the proposed conversion complies

with key requirements of these policies and is therefore acceptable in principle for conversion to an HMO.

Quality of Accommodation

The National Planning Policy Framework pays specific regard to design being of high quality. Chapter 12 discusses how good quality design is instrumental amongst development proposals. Paragraph 131 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development.

The London Plan specifically through Policies GG4, D3, D5 and D6 all emphasise the importance of high quality design in development.

London Plan Policy D6 requires housing developments to be of high-quality design, providing comfortable and functional layouts, benefiting from sufficient daylight and sunlight, maximising the provision of dual aspect units and providing adequate and easily accessible storage space as well as outdoor amenity space. Table 3.1 sets out the internal minimum space standards for new developments, while Table 3.2 of the London Plan provides qualitative design aspects that should be addressed in housing developments.

Part A (d) of policy DM17 requires proposals to result in high quality accommodation, which satisfies the relevant policies of the Local Plan. This includes internal space standards, which are set out in the London Plan (2021) and the government's 2015 'Technical housing standards – Nationally Described Space Standard' (NDSS). Its requirements also include the provision of a satisfactory level of amenity space for occupants, and adequate and convenient refuse storage and collection.

The layout includes a kitchen/ dining space on the first floor, which provides a communal facility space of 15.7sqm not more than one floor away. All residents would also have access to the rear garden for external amenity. The HMO would comprise of 4 bedrooms capable of accommodating 4 residents, each with their own en-suite bathroom and living space. All rooms have access to the kitchen/ dining space to share. Haringey's HMO standards are 10 sqm and all rooms bar one meet this. It is noted that the smallest room meets the Nationally Described Space Standards (2015) for a single bedroom and that occupants of this rooms have had no concerns in this use for the past 5 years.

Bedroom A	24.5sqm
Bedroom B	18.3sqm
Bedroom C	30sqm
Bedroom D	30sqm

The internal layout of the proposal and amenities provided is considered to constitute high quality accommodation in accordance with part A of Policy DM17 of the DPD Development Management Plan. As such, the proposal would provide an acceptable quality of accommodation for the future occupiers.

Design and Impact on the Character of the Area

Chapter 12 of the NPPF outlines that planning decisions should aim to ensure that developments function well and add to the overall quality of an area not just for the short term, but over the lifetime of the development.

London Plan Policy D1 states that London Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth.

London Plan Policy D3 states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Policy D4 has regard to the delivery of good design emphasising the need for quality submissions including sufficient detail at application stage to ensure clarity and assurance over what design is to be approved and to avoid future amendments and value engineering resulting in changes that would be detrimental to the design quality. Policy D8 has specific regard to preserving and enhancing the visual amenity of the public realm.

Haringey DPD Policy DM12 'Housing Design and Quality' states that extensions or alterations to residential buildings, including roof extensions will be required to be of a high, site specific, and sensitive design quality, and respect and/ or complement the form, setting, period, architectural characteristics, detailing of the original building, including external features such as chimneys, and porches. High quality matching or complementary materials should be used appropriately and sensitively in relation to the context. DPD Policy DM1 'Delivering High Quality Design' requires development proposals to relate positively to their locality, while Local Plan (2017) Policy SP11 requires the highest standard of design that respects local context and character and historic significance, which is equally supported by London Plan (2021) Policy D6.

The proposal does not include any external design changes.

Impacts on neighbouring amenity

London Plan Policies GG1, GG3, GG4, D3, D8 and D14, and Local Plan Policies S6, SP1, SP2, SP3, SP8, H1 and H3 all have relevance to the importance of quality development which addressing neighbouring amenity and avoiding unacceptable impacts. In particular Policy SP8 of the Local Plan relates specifically to 'ensuring neighbourly development' specifying

various potential impacts that development proposals shall take into account and avoid or minimise. Additionally, Policy H3 in relation to specialist accommodation additionally reiterates the need to ensure that the amenities or unique characteristics of the existing neighbourhood are protected and enhanced.

DPD Policy DM1 'Delivering High Quality Design' states that development proposals must ensure a high standard of privacy and amenity for a development's users and neighbours. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land, and to provide an appropriate amount of privacy to neighbouring properties to avoid overlooking and loss of privacy and detriment to amenity of neighbouring resident.

The property is situated in a primarily residential area and a House in Multiple Occupancy is an acknowledged residential use. To this end, a degree of compatibility with regard to surrounding context is recognised.

The likely pattern of use of a property is significant factor in impacting neighbouring amenity, rather than merely considering the number of occupants. A reasonable expectation is that each occupant of the HMO would lead separate, individual lives with more comings and goings than a single family dwelling. The intention for the residents, is and continues to be, to live in a shared facility which allows for more affordable options for renting whilst also a more economic, resourceful, and social living situation than if they were to rent larger self-contained flats/ apartments individually.

The property requires an HMO licence due to its status as a property rented out to multiple tenants who are not part of the same household, a condition that legally necessitates such a licence. This regulatory measure ensures that the property meets specific health and safety standards, providing adequate living conditions for all occupants. An HMO licence is crucial for properties like this to ensure compliance with local housing regulations, which include fire safety protocols, adequate space and amenities, and proper maintenance. Additionally, the licence ensures that the landlord or managing agent is a fit and proper person to manage the property, thereby protecting tenants' welfare. Given the property's location in a densely populated urban area, the licence also helps in managing the impact on local services and infrastructure, preventing issues such as overcrowding and ensuring the neighbourhood remains a safe and pleasant environment for all residents.

Therefore, the impacts to neighbouring amenity would not be unacceptable in this instance.

Sustainable Transport

The NPPF recognises that sustainable transport has an important role to play in facilitating sustainable development but also contributing to wider health objectives. In particular it offers encouragement to developments which support reductions in greenhouse gas emissions and those which reduce congestion. The NPPF also outlines that developments which generate significant vehicle movements should be located where the need to travel

will be minimised and the use of sustainable transport options can be maximised. It is also expected that new development will not give rise to the creation conflicts between vehicular traffic and pedestrians.

Local Plan Policy SP7 'Transport' states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This is supported by DPD Policy DM31 'Sustainable Transport'.

DPD Policy DM32 'Parking' states that the Council will support proposals for new development with limited or no on-site parking where there are alternative and accessible means of transport available, public transport accessibility is at least 4 as defined in the Public Transport Accessibility Level (PTAL), a Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development, parking is provided for disabled people; and parking is designated for occupiers of developments specified as 'car capped'.

The proposal is in a highly sustainable location in close proximity to train stations being 1km from Seven Sisters train station. In addition, the site has a PTAL of 4. Therefore, there is no requirement for on site parking, as residents will use public transport, walking and cycling. Cycle spaces can be conditioned if necessary.

Waste Management

The London Plan at chapter 9, specifically policy SI7 and SI8, and Local Plan Policies INF3 and SP8, aim to minimise or mitigate the impacts of waste transport and management on the environment and the borough's residents and to ensure innovative approaches to sustainable waste management with the provision of waste and recycling storage. Policy INF3 specifically requires development to ensure on-site handling and storage can meet the needs of the development and local collection arrangements without amenity impacts for occupiers or neighbours, where appropriate providing innovative approaches to sustainable waste management in line with SP8.

Policy DM4 of the development Management DPD states that all proposals will be required to make on-site provision for general waste, the separation of recyclable materials and organic for composting. The on-site provision must:

- Ensure adequate dedicated internal and external storage space to manage the volume of waste arising from the site;
- Provide accessible and safe access to on-site storage facilities, both for occupiers and collection operatives, including vehicles, having regard to the Council's Refuse Collection Strategy;
- Be located and screened to avoid nuisance and adverse impact on visual and other amenity to occupiers and neighbouring uses and are within the maximum permitted carrying and reversing distances.

A condition can be attached to provide details of proposed waste/refuse storage.

The proposal would have dedicated internal and external storage space for dry recycling, food waste and residual waste and it is assumed that the existing waste arrangements of the residential unit would be retained which is acceptable.

The HMO use including shared facilities between 4 separate individuals would prove more a sustainable use of resources including water and energy than if the user moved into a self-contained flat. This results in shared facilities including a bathroom and a kitchen/ dining between 4 residents.

Therefore, the proposal would not be unacceptable in relation to waste management.

Conclusion

This report has highlighted that the proposal, subject to this application, is in accordance with the Council's planning policies and national planning policy.