



# Officer Report

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|----------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| <b>Application Number:</b> | <b>HGY/2026/0860</b>                                                                                                            |
| <b>Application Type:</b>   | <b>Change of use</b>                                                                                                            |
| <b>Address:</b>            | 29 Harringay Road, Tottenham, London, N15 3JB                                                                                   |
| <b>Proposal:</b>           | Change of use from single family dwellinghouse (Use Class C3) to small House in Multiple Occupation (Use Class C4) (retention). |
| <b>Case Officer:</b>       | Adam Silverwood                                                                                                                 |
| <b>Valid Date:</b>         | 02/04/2026                                                                                                                      |
|                            | 6                                                                                                                               |
| <b>Applicant:</b>          | Mr Aaron Issack                                                                                                                 |
| <b>Agent:</b>              | Mustafa Bashkal                                                                                                                 |

## **RECOMMENDATION**

### **Refuse**

#### **1. Proposed Development**

This is an application for a change of use from a residential dwelling (C3) to a House of Multiple Occupation (5 persons – C4).

#### **2. Site and Surroundings**

The application site is two storey terraced building located on the western side of Haringey Road. The site is located within a family housing protection area. It is also located in an area in which permitted development rights to change the use of a single family dwellinghouse (C3) to a small House in Multiple Occupation (HMO) (C4) have been removed by an Article 4 Direction introduced in 2013.

#### **3. Relevant Planning and Enforcement History**

There is no planning application history relevant to the consideration of this application.

#### **Planning Enforcement History**

ENF/2026/0138: Change of use into HMO (C4) without planning permission - ongoing investigation

#### **5. Local Representations**

The application has been publicised by way of letters sent to neighbouring properties. No representations were received from neighbours, local groups, etc.

One Objection was received from LBH Public Health Team:

*'The Public Health team, on behalf of the Director of Public Health, have concerns that the property is inadequate to comfortably accommodate up to six individuals as gross original internal floor space of the existing dwelling is less than 120m<sup>2</sup> and should remain a family property as it is located in the Family Housing Protection Zone (policy DM17).*

*Approximately 23.2% of properties are overcrowded in the local area (Census 2021 data), and it is likely an HMO of this size in this property would add to this. Overcrowding, and poor-quality housing, is a public health issue that exacerbates physical and mental health conditions and is associated with the increased spread of infectious diseases (Institute of Health Equity, 2022). The room sizes do not adhere to Haringey's HMO Standards, rooms 2, 4 and 5 fall below the expected 10m<sup>2</sup> for a one person letting.*

*There doesn't look to be enough cycle storage for up to six residents or encourage cycling as a sustainable transport option (as required by the London City Design Standards) and as the area has a PTAL rating of 3 car parking may become an issue (policy DM17).*

*Although there is a rear garden for shared use, adequate indoor shared amenity space should be provided to avoid residents being limited to spending time in their respective bedroom, which can have a negative impact on mental health and wellbeing especially if the bedroom is below the expected space standard (policy DM17).*

*The kitchen space provided is too small without clear sufficient cupboards, cooking space and fridge freezer access for up to six people (as mentioned in Haringey's HMO Standards) – this may lead to individuals not being able to store sufficient foods or cook fresh, healthy meals.*

*We recognise that HMOs are an important provision of affordable housing to residents in Haringey, however, as highlighted in Policy DM17 it is important that high quality accommodation is provided, with enough internal space and a satisfactory level of amenity space for occupants. We believe this is not reached in this application and this could have a detrimental impact on the health and wellbeing of residents.'*

The Council's Property Licensing Team also clarified to the Case officer that a mandatory license was awarded to the property for period of 29/01/2026 to 28/01/2027 for 5 occupants in 5 households.

## **6. Material Planning Considerations**

The main planning considerations raised by the proposed development are:

1. Principle of Development
2. Design and Impact of the proposed development on the Character and Appearance of the Area;
3. Impact on Neighbourhood Amenity
4. Waste

### **Principle of Development**

HMO accommodation plays an important role in meeting particular housing needs, especially for low-income residents, young people and those needing temporary accommodation, however as set out in Haringey's Development Management DPD 2017 (Para. 3.36) there are broader concerns in respect of losing family units to conversions, with HMOs heavily concentrated in the east of the Borough, with this leading to what it describes as "a significant loss in the availability of family housing for which there is strong need."

As such Policy DM17 sets out specific criteria that is required to be met to allow approval of the conversion of a home to an HMO within the area covered by the Article 4 Direction, specifically:

**a. The gross original internal floor space of the existing dwelling is greater than 120sqm.**

Comment: The original un-extended floor space of the dwelling (excluding the non-original ground floor side infill extension) 95.6sq.m as measured on the plans, and is therefore not considered to comply with the requirements of part A of policy DM17.

**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.**

Comment: The Strategic Housing Market Assessment (SHMA) found that there was a serious shortage of small family residential dwellinghouses. Therefore, in addition to the overall need for a net increase in the supply of housing (all types and tenures), the SHMA established that if the proportional loss of small family units continues at the same rate Haringey will fail to provide enough small to large family homes. The trend has raised concerns around population transience given the shortfall of housing suitable for expanding families. Given the Borough's existing and projected housing needs identified by the SHMA, policy has been developed to resist the loss of small-family housing, in particular through the subdivision of the existing traditional housing stock.

Policy DM16 seeks to maintain a supply of larger family homes to meet Haringey's housing need by restricting further residential conversions in areas of the Borough identified as already having a high concentration of converted properties. This will ensure the Council can protect the remaining existing stock of family houses (3+ bedrooms) within these areas (see Figure 3.1 'Family Housing Protection Zone'5), and to ensure that, across the Borough, the range of Haringey's housing needs can be met. 'Family housing' is defined in the London Plan 2021 glossary at page 505 as 'A dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five, or more bedrooms'

In a dismissed appeal in 2025 involving a 6 person HMO (ref: APP/Y5420/W/25/3370728), the Inspector acknowledged the relationship between Policy DM16 and DM17:

Policy DM17 applies at the site-specific level and, when read alongside Policy DM16, is intended to prevent the incremental erosion of much-needed family housing in areas where such stock is under pressure. The Inspector took the view that permitting the appeal scheme would erode the stock of smaller family dwellings that the policy seeks to protect and could make it more difficult for the local planning authority to resist similar proposals.

Haringey's recently published draft replacement Development Plan proposes introducing a quite stringent definition of overconcentration when it comes to HMOs. The draft policy proposes 5% or more of dwellings in a ward or 10% or more of dwellings in a street with a property licence as an HMO would be considered an overconcentration. While the draft replacement Development Plan is on its first consultation and carries little or no weight in the consideration of planning applications, it does indicate a direction of travel for the Council's approach towards HMO policy and is helpful in filling in a gap in the existing policy and the 10% limit for an individual street provides a useful measure for what might be considered an overconcentration at a more local level. Particularly as the draft policy is reflective of up-to-date data.

The current policy takes a local or neighbourhood approach to what might be considered an overconcentration, so it would not be appropriate at this stage in the plan cycle to apply the more strategic ward level definition. However, the 10% limit for an individual street provides a useful

measure for what might be considered an overconcentration at a more local level. Particularly as the draft policy is based on upon up-to-date data.

There are 26 properties registered as HMO's on Haringey Road. Out of 186 houses on this street this would lead to a concentration of 14% Houses of Multiple Occupation on this street.

Streets do not exist in isolation and an examination of Colina Road and Park Road that feeds onto Haringey Road has 9 out of 14 dwellings registered as HMO's leading to a concentration of 64%, while Park Road does not have any HMO's out of its 13 houses. This leads to a concentration in the area of 16.4% of the properties in the subject and surrounding streets operating as Houses of Multiple Occupation. This is considered to be an overconcentration and forms a reason for the refusal of this application.

**c. They are accessible by public transport, cycling and walking.**

Comment: The application site is located within a Ptal 3 zone which is considered to have an average level of accessibility to public transport. Bike lockers for up to 6 bikes are included in the rear garden on the property. This is considered to be on balance acceptable.

**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.**

Comment: The proposed plans indicate the building would be in use as a 5 bed HMO and this is corroborated by the HMO licence associated with this property.

The rooms sizes are detailed below

| Room              | Size     |
|-------------------|----------|
| Bedroom 1         | 14.2 sqm |
| Bedroom 2         | 9.1 sqm  |
| Bedroom 3         | 17.7 sqm |
| Bedroom 4         | 9.6 sqm  |
| Bedroom 5         | 7.2 sqm  |
| Kitchen           | 9.9 sqm  |
| Communal Area     | 10 sqm   |
| Bathroom (Ground) | 2.3 sqm  |
| Bathroom (First)  | 2.5 sqm  |

Bedrooms 2, 4 and 5 are below the requirement for at least 10m<sup>2</sup> for a one person letting as per the requirements of Haringey's HMO standards document, and bedroom 1 is below the minimum size of 15m<sup>2</sup> for a double letting. Therefore, the layout would not be considered to be of sufficient size to provide an appropriate standard of accommodation for 5 occupants in 5 households, and the application is recommended for refusal on these grounds.

**e. Where non-self-contained, have exclusive use of a kitchen or space within a shared kitchen for each household.**

Comment: There is one kitchen provided for the 5 persons, this would be located only one floors distance from each room. This is considered to be acceptable.

**Design and Impact on the Character and Appearance of the Area**

Policy DM1 (Delivering High Quality Design) states that 'all new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area', development 'a) must relate positively to neighbouring structures, new or old, to create a harmonious whole; b) make a positive contribute to a place improving the character and quality of an area; c) confidently address feedback from local consultation; d) demonstrate how the quality of development will be secured when it is built; e) are inclusive and incorporate sustainable design and construction principles'.

There are no external amendments to the property and the application is considered to be acceptable in this regard.

### **Impact on Neighbourhood Amenity**

London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, in specific stating that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. 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.

Other than contributing to an overconcentration of HMO's on this and the neighbouring streets, the application would accommodate 5 persons within 108.2 m2. This is considered to be an overconcentration that would lead to crowding, increased movements to and from the property within a confined area and is therefore detrimental to amenity of the adjoining occupiers and is recommended for refusal in this regard.

### **Waste & Recycling**

Two waste bins have been provided at the front of the property. This is considered to be acceptable.

### **Conclusion**

The proposed change of use from a single family dwelling to a 5 person HMO (use class C4) would not meet the relevant requirements of policy DM17 for conversion into a House of Multiple Occupation. Primarily the property would not meet the minimum space standards for operation as HMO within policy DM17 Part A. Furthermore, the change of use would result in an overconcentration of HMO's within the area, would fail to provide a satisfactory standard of accommodation, and would be detrimental to neighbouring amenity.

### **7. CIL Applicable**

N/A – No creation of floorspace above 100sqm.

### **8. Recommendation**

That planning permission be **REFUSED** for the following reason(s):

The change of use from a family dwelling to a small HMO would not meet the relevant requirements of policy DM17 for conversion into House of Multiple Occupation. Primarily the property would not meet the minimum space standards for conversion and operation as a HMO within Policy DM17 Part A.

The change of use from a family dwelling into a HMO would result in an overconcentration of HMO's within the area that would be contrary to Policy 17 Part B of the Haringey DMD 2017 and subsequently detrimental to neighbouring amenity.

**Refusal Reasons:**

The property has an original un-extended internal floor space of less than 120m<sup>2</sup>, and therefore is not considered to be appropriate for conversion to a House in Multiple Occupation (HMO) and would be best retained as a small single family dwellinghouse for which there is an identified need in the borough, contrary to policy DM17 of the Haringey Development Management DPD 2017.

The proposed change of use would add to an existing over-concentration of HMOs in the locality, as such leading to further intensification and exacerbating current cumulative amenity impacts in the locality such as over-flowing bins and refuse mismanagement, fly-tipping linked to high turnover properties. The development is therefore contrary to Policy DM17(b) of the Haringey Development Management DPD (2017).

The proposed HMO, by reason of a number of bedrooms having small floor space sizes, would provide a cramped and sub-standard form of accommodation for occupants of the development, contrary to policy DM17 of the Haringey Development Management DPD 2017.