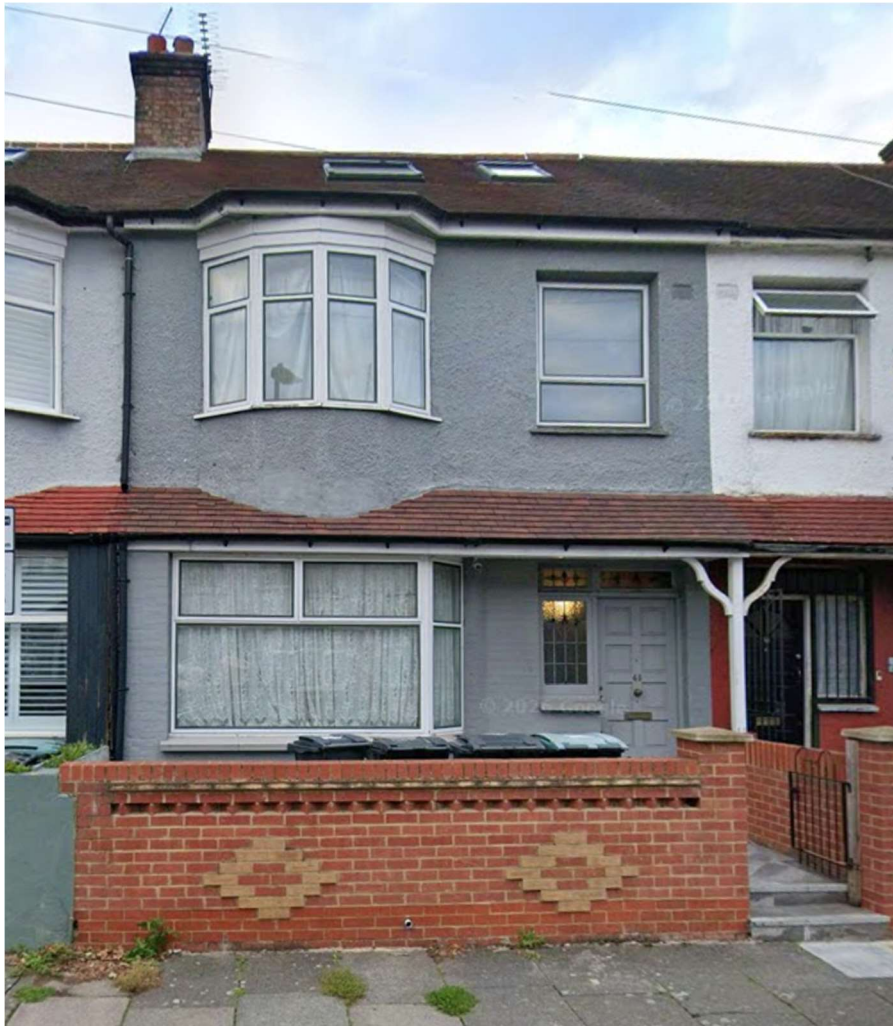


DESIGN AND ACCESS STATEMENT

Site: 45 Buller Road, Tottenham, London, N17 9BH

Proposal: Retention of the residential property as a Five-Bedroom Six-Person House in Multiple Occupation (Use Class C4)

Applicant: Mr Jihong Wu



Date: June 2026

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1. INTRODUCTION

1.1 This Design and Access Statement has been prepared by **OPS Chartered Surveyors** on behalf of the Applicant in support of a full planning application seeking retrospective planning permission for the retention of **45 Buller Road, Tottenham, London N17 9BH** as a **five-bedroom, six-person House in Multiple Occupation (Use Class C4)**.

1.2 The proposal relates solely to the continued use of the property as a small House in Multiple Occupation accommodating no more than six unrelated individuals sharing communal facilities. No external alterations to the building are proposed as part of this application, and the existing appearance of the property and the established character of the surrounding residential area will remain unchanged.

1.3 The application has been prepared following a comprehensive review of the property, the existing internal layout, the relevant planning policy framework and the operational requirements associated with a well-managed Class C4 HMO. In addition to considering the planning merits of the proposal, the Applicant has taken the opportunity to substantially improve the internal accommodation provided within the property.

1.4 Unlike many retrospective HMO applications, which seek simply to regularise an existing use, the current proposal has been specifically designed to improve the quality of accommodation available to future occupiers. The revised layout represents a clear enhancement over the previous arrangement through the removal of unnecessary bedroom accommodation, the creation of improved communal facilities and the provision of a significantly better standard of residential living.

1.5 The existing layout comprised **seven bedrooms**, including a bedroom of approximately **5.7 square metres**, together with comparatively limited communal accommodation. The proposed layout reduces the property to **five bedrooms accommodating a maximum of six occupiers**, removes the undersized bedroom entirely, creates a dedicated study and significantly enlarges the communal dining accommodation. These changes reduce the overall intensity of internal occupation while substantially improving the quality of the living environment for future residents. The proposal therefore, represents a clear qualitative improvement rather than an intensification of the existing use.

1.6 The application should therefore be assessed not simply as a proposal for the retention of an HMO, but as an opportunity to secure a significantly improved form of shared residential accommodation. In planning terms, the proposal delivers a number of important benefits, including:

- the reduction in the number of bedrooms from seven to five;
- the removal of substandard accommodation;
- significantly improved communal living space;
- the introduction of a dedicated study for occupiers;
- improved internal circulation;
- a lower intensity internal layout;
- the continued provision of much-needed shared housing accommodation;
- the retention of the existing residential appearance of the property.

Collectively, these improvements demonstrate that the proposal represents a materially better form of development than the existing arrangement.

1.7 The proposal has been assessed against the relevant provisions of the **National Planning Policy Framework (NPPF)**, the **London Plan (2021)** and the adopted planning policies of the **London Borough of Haringey**, with particular regard to **Policy DM17 – Houses in Multiple Occupation**. This Statement demonstrates that the proposal provides a high standard of accommodation for future occupiers, would not result in unacceptable impacts upon neighbouring residential amenity or the character of the surrounding area, and represents a sustainable form of development within an established urban location.

1.8 This Statement should be read alongside the following documents submitted in support of the application:

- Application Forms and Certificates;
- Existing and Proposed Floor Plans;
- Location Plan;
- Site/ Block Plan (with Refuse and Cycle Storage Details)
- HMO Management and Supervision Plan;
- Any other supporting documentation submitted as part of the application.

2. THE SITE AND SURROUNDINGS

2.1 The application site comprises an extended three-storey mid-terrace dwelling with accommodation within the roof space, located on the eastern side of Buller Road in Tottenham. The property forms part of a continuous terrace of residential dwellings of broadly consistent scale, appearance and architectural character, reflecting the established Victorian residential pattern that characterises this part of the borough.

2.2 Buller Road is a mature residential street comprising predominantly terraced dwellings, many of which have been adapted over time to meet changing housing needs. The surrounding area accommodates a mix of family housing, privately rented accommodation and other forms of residential occupation, reflecting the diverse housing stock typical of this part of Haringey.

2.3 The site occupies a highly sustainable urban location benefiting from excellent access to a wide range of day-to-day services and facilities. Local shops, schools, healthcare facilities, community services and employment opportunities are all located within convenient walking distance, reducing reliance on private motor vehicles and supporting sustainable patterns of development.

2.4 The property is also well served by public transport. Regular bus services operate within easy walking distance of the site, while nearby rail and Underground stations provide direct connections to Central London and surrounding employment areas. The location is therefore particularly well suited to shared residential accommodation occupied by individuals who are likely to rely upon sustainable modes of transport for commuting and everyday travel.

2.5 The application site is not a listed building and is not affected by any proposal involving extensions, external alterations or changes to the appearance of the building. Accordingly, the proposal would preserve the established character of the street scene and would remain visually indistinguishable from the existing dwelling.

2.6 The proposal relates solely to the continued residential use of the property as a small Class C4 House in Multiple Occupation. The scale of occupation proposed is modest, and the physical appearance of the property will remain entirely unchanged. Consequently, the proposal integrates naturally within its established residential surroundings without giving rise to any adverse townscape or visual impacts.

3. PLANNING HISTORY AND EXISTING SITUATION

3.1 The application property comprises an established residential dwelling that has been occupied as a House in Multiple Occupation. This application seeks retrospective planning permission for the continued use of the property as a **five-bedroom, six-person Class C4 House in Multiple Occupation**, together with the revised internal layout shown on the submitted drawings.

3.2 The proposal does not involve any enlargement of the building, external alterations or engineering works. The scale, massing, appearance and external envelope of the dwelling remain entirely unchanged. Consequently, the planning considerations arising from this application relate principally to the appropriateness of the use, the standard of accommodation provided for future occupiers and the potential effect upon neighbouring residential amenity.

3.3 As part of the preparation of this application, the applicant has undertaken a comprehensive review of the internal accommodation with the objective of improving the overall quality of the living environment. Rather than seeking to maximise the number of letting rooms, the proposal has been deliberately redesigned to reduce the number of bedrooms whilst significantly improving the quality of the shared accommodation available to occupiers.

3.4 The revised internal arrangement should therefore be regarded as a substantial improvement over the previous layout. The proposal removes one of the existing bedrooms, including a room that would no longer represent an acceptable standard of accommodation by modern expectations, and replaces it with a dedicated study. In addition, the communal dining accommodation has been significantly enlarged to provide a more functional and comfortable shared living environment. These alterations demonstrate that the proposal has been driven by the objective of improving residential quality rather than increasing occupancy or rental intensity.

3.5 It is important to recognise that planning permission is sought for a **maximum occupancy of six persons only**, notwithstanding that the property contains five bedrooms. This represents a relatively modest form of Class C4 HMO occupation and differs materially from larger HMO developments or Sui Generis HMOs accommodating greater numbers of residents. The proposal, therefore, remains proportionate in scale and is fully consistent with the definition of a small HMO under the Town and Country Planning (Use Classes) Order.

3.6 In determining this application, it is respectfully submitted that considerable weight should be given to the fact that the proposal represents a **qualitative improvement** to the existing accommodation. The planning system exists not merely to regulate changes of use but also to encourage improvements to the quality of the built environment and living conditions. The revised layout delivers those improvements without increasing the physical footprint of the building or altering its external appearance.

4. PLANNING POLICY FRAMEWORK

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of this application, the relevant Development Plan comprises:

- The National Planning Policy Framework ("NPPF");
- The London Plan (2021);
- The Haringey Local Plan and Development Management Policies;
- Any other material planning considerations, including adopted guidance relating to Houses in Multiple Occupation.

The proposal has been carefully assessed against this policy framework and is considered to comply with its objectives.

National Planning Policy Framework

4.2 The National Planning Policy Framework places significant emphasis upon achieving sustainable development through the efficient use of previously developed land and existing housing stock. It also seeks to ensure that planning decisions contribute towards the creation of inclusive, mixed and balanced communities capable of meeting a wide range of housing needs.

4.3 The Framework recognises that housing demand is diverse and that the planning system should support a broad range of accommodation types capable of meeting the needs of different sectors of the population. Small Houses in Multiple Occupation make an important contribution in this respect by providing relatively affordable accommodation for young professionals, key workers, students and other single-person households who may otherwise struggle to access the private housing market.

4.4 The proposal makes efficient use of an existing residential property without requiring any extension or redevelopment. It therefore represents an inherently sustainable form of development consistent with the objectives of the Framework.

The London Plan (2021)

4.5 The London Plan seeks to optimise the use of London's existing housing stock while ensuring that development provides a high standard of residential accommodation and contributes positively towards meeting the capital's significant housing needs.

4.6 The proposal has particular regard to **Policy D6 – Housing Quality and Standards**. Although primarily directed towards new residential development, the underlying principles of Policy D6 remain highly relevant when assessing changes of use involving residential accommodation. The policy seeks to ensure that occupiers benefit from a satisfactory standard of living, including appropriate internal space, access to daylight, adequate outlook, suitable communal facilities and a comfortable living environment.

The proposal has been specifically designed to improve these aspects of residential quality. The reduction in bedroom numbers, removal of an undersized bedroom, provision of a dedicated study

and enlargement of the communal dining area all contribute to a significantly enhanced standard of accommodation when compared with the existing arrangement. As such, the proposal aligns closely with the objectives of Policy D6.

4.7 The proposal also accords with **Policy T5 (Cycling)** and **Policy T6.1 (Residential Parking)** by promoting sustainable travel choices. Given the site's highly accessible location and the modest scale of occupation proposed, the development is not expected to generate an unacceptable demand for private car parking and is well placed to support travel by walking, cycling and public transport.

Haringey Development Management Policies

4.8 The principal policy relevant to this application is **Policy DM17 – Houses in Multiple Occupation**, which recognises that HMOs form an important component of the Borough's housing stock while ensuring that such accommodation is appropriately located, well designed and does not give rise to unacceptable impacts upon residential amenity or the character of the surrounding area.

4.9 Policy DM17 does not establish a presumption against HMOs. Rather, it requires each proposal to be assessed on its individual merits, taking into account factors such as the quality of accommodation, concentration of HMOs, residential amenity, refuse storage, cycle parking and the effect upon the surrounding neighbourhood.

The current proposal has been prepared specifically to satisfy each of these policy objectives. Throughout this Statement, each of the relevant criteria is considered in detail with reference to the submitted drawings and supporting evidence.

4.10 It is also relevant that the proposal involves the retention of a **small Class C4 HMO**, rather than a large Sui Generis HMO. The scale of occupation proposed remains modest, the building retains its domestic appearance and the revised internal layout provides a standard of accommodation that materially exceeds the quality of the previous arrangement.

Article 4 Direction

4.11 The application site lies within Haringey's Article 4 Direction area, which removes permitted development rights for changes of use from Use Class C3 to Use Class C4.

The purpose of the Article 4 Direction is to ensure that proposals for HMOs are subject to planning assessment. It does **not** establish a presumption against HMOs, nor does it require such proposals to be refused as a matter of principle.

4.12 Accordingly, the determination of this application should focus upon the planning merits of the proposal. As demonstrated throughout this Statement, the proposal provides a significantly improved form of shared residential accommodation, safeguards neighbouring amenity, preserves the character of the surrounding area and contributes towards meeting the Borough's identified housing needs. It is therefore fully consistent with both the objectives of the Article 4 Direction and the wider aims of the Development Plan.

5. PRINCIPLE OF DEVELOPMENT

5.1 The principal issue for the Local Planning Authority is whether the continued use of the property as a small Class C4 House in Multiple Occupation represents an acceptable form of development, having regard to the adopted Development Plan and all other material planning considerations.

It is respectfully submitted that the answer to this question is **yes**.

The proposal has been carefully designed to provide high-quality shared accommodation within an existing residential dwelling, without altering the external appearance of the building or materially affecting the character of the surrounding area. Furthermore, the proposal represents a clear improvement over the existing internal arrangement through the reduction in bedroom numbers and the enhancement of communal living facilities.

Accordingly, the proposal should be assessed not merely as a change of use, but as a significant improvement in the quality of accommodation provided within the existing building.

5.2 The National Planning Policy Framework promotes the efficient use of land and existing buildings while supporting the creation of mixed and balanced communities capable of meeting a wide range of housing needs. It recognises that planning should facilitate the delivery of different forms of housing to meet the needs of different groups within society.

Small Houses in Multiple Occupation play an important role in achieving these objectives. They provide an established and relatively affordable form of accommodation for individuals who may not require or be able to afford self-contained accommodation, including young professionals, key workers, graduates and other single-person households.

The proposal therefore contributes positively towards the diversity of Haringey's housing stock by providing an important form of accommodation that complements, rather than competes with, traditional family housing.

5.3 London continues to experience significant pressure on its housing market. Whilst much planning policy focuses upon the delivery of new dwellings, it is equally important that the existing housing stock is utilised efficiently and responsibly to meet changing housing demands.

Small HMOs form part of this wider housing strategy by providing flexible, affordable accommodation in sustainable urban locations. They reduce pressure upon the wider housing market by offering an alternative form of occupation for households that neither require nor seek conventional family housing.

In this respect, the proposal supports the broader objectives of both national and London-wide planning policy.

5.4 The application site occupies a highly sustainable residential location with excellent access to public transport, employment opportunities, shopping facilities, healthcare services and community infrastructure. Such locations are particularly appropriate for shared residential accommodation because occupiers are less likely to be dependent upon private motor vehicles and are able to rely upon sustainable modes of transport for day-to-day activities.

The proposal therefore represents an efficient and sustainable use of an existing residential property without requiring new development, additional land take or changes to the established urban form.

5.5 Importantly, the proposal does **not** seek to intensify the use of the property.

This distinction is fundamental to the planning merits of the application.

Many retrospective HMO applications seek permission for the maximum number of bedrooms that can physically be accommodated within a property, often resulting in cramped layouts, limited communal facilities and reduced residential amenity.

That is not the case here.

The Applicant has instead taken the opportunity to redesign the internal accommodation with the primary objective of improving living conditions for occupiers. This has resulted in a substantial reduction in bedroom numbers, together with a significant increase in communal accommodation.

The proposal, therefore, demonstrates a commitment to residential quality rather than maximising occupancy.

5.6 It is also relevant that the proposal falls within **Use Class C4**, which is specifically defined as occupation by no more than six unrelated individuals living together and sharing basic facilities.

The planning system recognises that such occupation remains fundamentally residential in character.

The proposed use does not introduce commercial activity, visitor accommodation or institutional care. The day-to-day occupation of the property will remain comparable to many family households, with residents sharing kitchens, bathrooms and communal facilities within a single dwellinghouse.

Consequently, the proposal would continue to function as a residential property and would integrate naturally within the surrounding neighbourhood.

5.7 The Council's Article 4 Direction should also be considered in its proper context.

The purpose of the Direction is to ensure that proposals for changes of use from Class C3 to Class C4 are subject to planning scrutiny. It is not intended to prevent HMOs in principle, nor does it establish a policy presumption against such development.

Instead, each proposal must be assessed on its own merits, having regard to its design, scale, management, impact upon neighbouring amenity and compliance with the Development Plan.

The current application has been prepared specifically to address each of these matters and demonstrates that the proposal satisfies the objectives of the relevant planning policies.

5.8 Having regard to the above considerations, it is considered that the principle of retaining the property as a five-bedroom, six-person Class C4 House in Multiple Occupation is entirely appropriate in planning terms.

The proposal makes efficient use of an existing residential property, contributes towards meeting identified housing needs, provides high-quality accommodation in a sustainable location and does so without giving rise to unacceptable impacts upon the surrounding area.

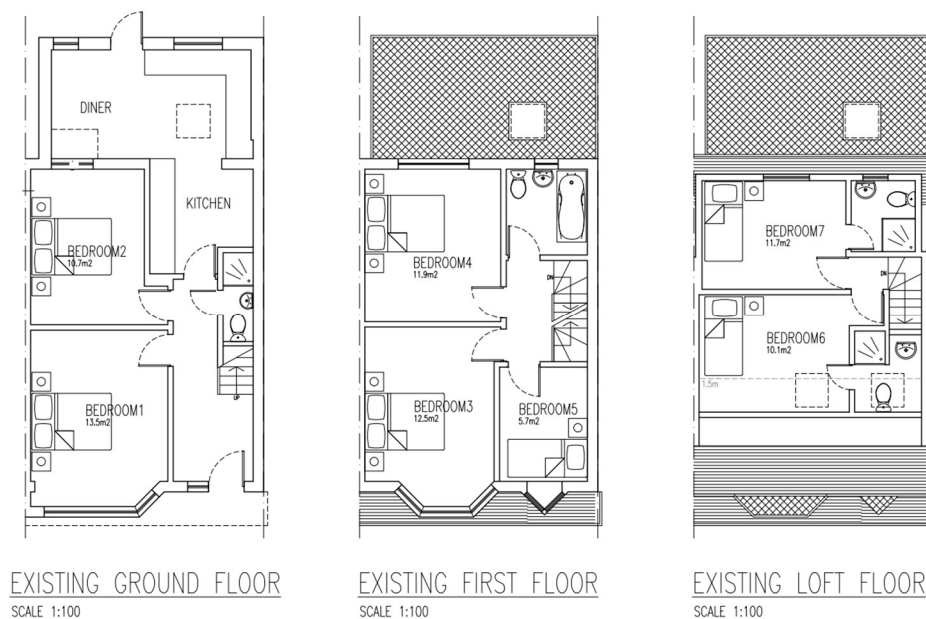
The principle of the development should therefore be regarded as acceptable.

6. THE PROPOSED DEVELOPMENT

6.1 Planning permission is sought for the retention of the property as a **five-bedroom, six-person House in Multiple Occupation (Use Class C4)**. The proposal is accompanied by revised internal floor plans, which have been specifically prepared to improve the quality of accommodation available to occupiers whilst maintaining an appropriate level of occupation.

6.2 The proposal does not involve any extension to the existing building, any increase in the building's footprint, any alterations to the roof, or any changes to the front, rear or side elevations. Consequently, the external appearance of the property will remain unchanged, and the proposal will have no adverse impact upon the character or appearance of Buller Road.

The development is therefore concerned solely with the internal organisation of the accommodation and the continued use of the property as a small HMO.



6.3 The revised internal layout has been carefully designed to provide:

- Five bedrooms.
- A maximum occupancy of six residents.
- A shared kitchen.
- An enlarged communal dining area.
- A dedicated study room for communal use.
- Bathroom facilities are distributed across the three floors.
- Private rear garden space.
- Secure cycle parking.
- Refuse and recycling storage.

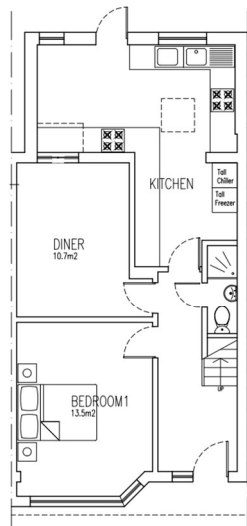
The layout reflects a considered balance between providing sufficient private accommodation for occupiers and ensuring that generous communal facilities are available for everyday living.

6.4 The proposed accommodation differs significantly from the previous layout. Rather than maximising the number of lettable rooms, the revised plans reduce the overall number of bedrooms and allocate additional floor space to communal living and ancillary accommodation. This approach

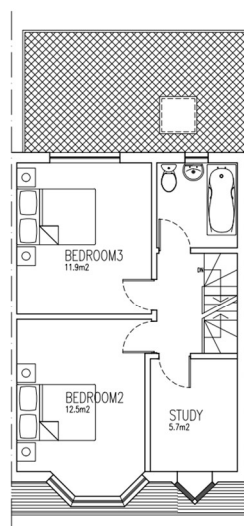
reflects the Applicant's commitment to improving residential quality and accords with the underlying objectives of both the London Plan and Policy DM17.

6.5 The proposal removes the former bedroom located on the first floor that measured approximately 5.7 square metres, a room that would no longer represent an acceptable standard of accommodation under current HMO expectations. The removal of this room provides the opportunity to introduce a dedicated study while improving circulation and the overall functionality of the first-floor layout. At the ground-floor level, the former bedroom has been incorporated into an enlarged communal dining area, creating a more spacious and usable shared environment for occupiers.

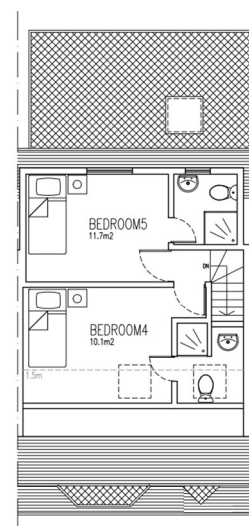
6.6 Taken as a whole, the revised layout represents a significant improvement over the existing arrangement. The proposal reduces the number of bedrooms from seven to five, retains occupation by no more than six persons and materially improves the quality of the communal accommodation available to residents. These changes are of considerable planning significance and should attract substantial weight in the determination of the application.



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7. BETTERMENT OVER THE EXISTING ARRANGEMENT

7.1 Introduction

One of the principal material considerations in determining this application is the significant improvement that the proposal makes to the standard of accommodation currently provided within the property.

Whilst the application seeks retrospective planning permission for the continued use of the property as a Class C4 House in Multiple Occupation, the proposal should not be viewed simply as a continuation of the existing use. Instead, it represents a carefully considered redesign of the internal accommodation with the objective of significantly improving the living conditions of future occupiers.

Unlike many retrospective HMO applications, which seek to maximise occupancy and retain existing layouts, the Applicant has chosen to reduce the intensity of the accommodation and improve the quality of the internal environment. This distinction is fundamental to the planning merits of the proposal and should be afforded substantial weight in the determination of the application.

7.2 Existing Layout

The existing accommodation comprises **seven bedrooms** distributed across three floors, together with shared kitchen and bathroom facilities. Whilst the property has functioned as an HMO, the existing arrangement reflects a layout that has evolved over time and does not represent the most efficient or desirable use of the available internal space.

In particular, the existing layout includes a bedroom measuring approximately **5.7 square metres**. Although previously capable of occupation, this room would no longer represent an acceptable standard of residential accommodation, having regard to modern expectations for HMO living.

The presence of this room also limits the amount of communal accommodation available within the property and contributes to a higher internal density of occupation.

7.3 Proposed Layout

The proposed arrangement fundamentally rebalances the internal accommodation.

Rather than seeking to maximise the number of bedrooms, the proposal reallocates floor space to provide a more appropriate balance between private sleeping accommodation and shared communal facilities.

The revised layout provides:

- Five bedrooms.
- Maximum occupation by six persons.
- A substantially enlarged communal dining room.
- A dedicated study.
- Improved circulation.
- Retained kitchen.
- Bathroom facilities across three floors.
- Improved residential environment.

This approach reflects modern expectations for high-quality shared accommodation and demonstrates a clear commitment to improving living standards.

7.4 Comparison of Existing and Proposed Layout

The improvements delivered by the proposal are summarised below.

Existing Arrangement	Proposed Arrangement	Planning Benefit
Seven bedrooms	Five bedrooms	Reduced intensity of accommodation
Approx. 3.7m ² bedroom retained	Bedroom removed	Elimination of substandard accommodation
Limited communal accommodation	Enlarged communal dining room	Improved shared living environment
No dedicated study	Dedicated study provided	Enhanced flexibility for home working and study
Higher internal density	Lower density	Improved residential amenity
Greater emphasis on bedrooms	Better balance between private and communal space	Improved quality of accommodation

The revised layout, therefore, represents a comprehensive improvement in the quality of accommodation rather than an intensification of the existing use.

7.5 Reduction in Intensity

An important characteristic of the proposal is that it reduces the physical intensity of the internal accommodation.

Although the number of occupants remains limited to six persons, the proposal reduces the number of bedrooms by approximately **29%**, from seven to five.

This reduction provides significantly greater flexibility in the use of internal space and allows communal facilities to be enhanced without increasing the overall scale of the development.

The revised arrangement, therefore, provides a noticeably less intensive form of occupation than previously existed.

From a planning perspective, this is an important benefit because concerns commonly associated with HMOs often arise where the internal accommodation has been over-intensified through the creation of excessive numbers of bedrooms at the expense of communal living space.

The proposal takes the opposite approach.

7.6 Improved Communal Accommodation

High-quality communal accommodation is fundamental to the successful operation of a small House in Multiple Occupation.

The proposal substantially enlarges the communal dining area by incorporating the former ground-floor bedroom into the shared accommodation. This provides occupiers with a significantly improved environment for dining, social interaction and day-to-day living.

The dining room forms part of an integrated communal arrangement with the adjoining kitchen and circulation space. It is readily accessible to all occupiers and functions as part of the overall shared living environment.

In this case, the proposal clearly achieves that objective through the overall enhancement of the communal facilities.

7.7 Dedicated Study

A further planning benefit is the creation of a dedicated study.

The increasing prevalence of home working, online learning and flexible employment has significantly altered the way in which residential accommodation is used.

The provision of a dedicated study provides occupiers with additional functional space that can be used for work, education or other domestic purposes without relying solely upon bedrooms or communal areas.

The inclusion of this room represents a qualitative improvement to the accommodation and reflects modern patterns of residential occupation.

7.8 Residential Quality

The revised internal arrangement demonstrates a more balanced relationship between private and communal accommodation than previously existed.

Future occupiers will benefit from:

- more generous communal facilities;
- improved circulation space;
- better internal organisation;
- reduced bedroom density;
- improved flexibility of accommodation.

Collectively, these improvements significantly enhance the overall quality of the residential environment and are fully consistent with the objectives of London Plan Policy D6 and Haringey Policy DM17.

7.9 Planning Weight

The improvements described above should attract significant weight in the determination of this application.

The proposal does not simply retain an existing HMO.

Instead, it secures a materially better form of residential accommodation by:

- removing substandard accommodation;
- reducing the number of bedrooms;
- improving communal living facilities;
- introducing a dedicated study;
- reducing internal intensity; and
- delivering a substantially improved living environment for future occupiers.

These improvements are genuine planning benefits and distinguish the proposal from many retrospective HMO applications where no corresponding enhancement to residential quality is achieved.

8. LIVING CONDITIONS FOR FUTURE OCCUPIERS

8.1 Introduction

A principal objective of both the London Plan and Haringey Development Management Policy DM17 is to ensure that Houses in Multiple Occupation provide a satisfactory standard of accommodation for future occupiers.

The quality of accommodation should not be assessed solely by reference to individual room sizes but by considering the residential environment as a whole, including the relationship between private bedrooms, communal facilities, circulation space, sanitary accommodation and outdoor amenity.

When assessed in this way, the proposal provides a high standard of accommodation that is entirely appropriate for a five-bedroom, six-person Class C4 HMO.

8.2 Bedrooms

All five proposed bedrooms are of practical proportions and benefit from natural daylight and ventilation.

The proposal removes the smallest bedroom from the existing layout, thereby ensuring that all remaining bedrooms provide a significantly better standard of accommodation.

The revised arrangement, therefore, improves the quality of the private living environment available to each occupier.

8.3 Kitchen Facilities

The property retains a shared kitchen that is appropriately located at the ground-floor level and conveniently accessible to all residents.

The kitchen provides the facilities necessary for the day-to-day needs of six occupiers and forms the focal point of the communal accommodation, which includes: *2 sets of cooking facilities (2 cookers, 1 sink, 1 dishwasher), sufficient worktops, fridge freezers and food storage units*

Its relationship with the adjoining dining area encourages social interaction while maintaining a practical layout for everyday use.

8.4 Communal Living Space

One of the most significant improvements delivered by the proposal is the enlargement of the communal dining accommodation.

Shared living space is an important component of successful HMO design because it reduces reliance upon bedrooms for daytime activities and promotes a healthier balance between private and communal living.

By enlarging the dining area and reducing bedroom numbers, the proposal achieves a significantly improved communal environment compared with the existing arrangement.

8.5 Sanitary Facilities

The proposal provides sanitary accommodation distributed across the three floors of the property, comprising a ground-floor WC, a first-floor bathroom and a loft shower room. This arrangement ensures that bathroom facilities are conveniently available to occupiers irrespective of the floor on which their bedroom is located.

For a maximum occupancy of six persons, this level of provision is considered more than adequate and represents a good standard of residential accommodation. The distribution of facilities also assists in reducing pressure on any one bathroom during peak periods and contributes to the efficient day-to-day operation of the HMO.

The proposal therefore provides a level of sanitary accommodation that comfortably satisfies the needs of the intended occupiers.

8.6 Internal Circulation

The revised layout also delivers improvements to the circulation within the dwelling.

By reducing the number of bedrooms and reorganising the internal accommodation, the proposal creates a more logical and efficient relationship between the private and communal areas of the property.

Occupiers are able to access the communal kitchen, dining accommodation and bathroom facilities without passing through private rooms, thereby improving privacy, convenience and the overall functionality of the accommodation.

These improvements contribute positively towards the quality of the internal living environment.

8.7 Natural Light and Ventilation

The proposed bedrooms all benefit from direct access to natural daylight and natural ventilation through external windows or rooflights.

This represents a satisfactory standard of accommodation consistent with the objectives of good residential design.

The proposal significantly increases the size of the communal accommodation compared with the previous arrangement. The overall quality of the shared living environment is therefore materially improved notwithstanding the absence of direct outlook from the dining area itself.

When assessed as a whole, the proposal provides satisfactory living conditions for future occupiers.

8.8 Outdoor Amenity Space

The existing rear garden is retained in its entirety, which includes a covered and open spaces and continues to provide valuable outdoor amenity space for future occupiers.



The proposal does not extend the building, reduce the size of the garden or introduce any structures that would compromise its usability.

The garden remains capable of accommodating outdoor seating, informal recreation and domestic activities associated with day-to-day occupation.

The retention of this external amenity space further contributes towards the quality of the residential environment.

8.9 Overall Residential Quality

Planning policy requires an overall assessment of the living conditions created by a proposal rather than focusing on individual elements in isolation.

When viewed as a whole, the proposal provides:

- generous bedrooms;
- improved communal accommodation;
- a dedicated study;
- adequate bathroom facilities;
- retained external amenity space;
- satisfactory daylight and ventilation;
- improved internal circulation.

Taken together, these factors demonstrate that the proposal provides a high standard of accommodation fully consistent with the objectives of Policy DM17 and the wider principles of London Plan Policy D6.

Accordingly, it is considered that future occupiers would enjoy a satisfactory standard of residential amenity.

9. COMPLIANCE WITH HARINGEY POLICY DM17

9.1 Introduction

Policy DM17 is the principal development management policy governing Houses in Multiple Occupation within the London Borough of Haringey.

The policy does not seek to prevent HMOs in principle. Rather, it seeks to ensure that proposals are appropriately located, provide a satisfactory standard of accommodation and do not result in unacceptable impacts upon neighbouring occupiers or the surrounding area.

The proposal has been specifically designed with regard to each of these objectives.

For ease of reference, the principal requirements of Policy DM17 are considered individually below.

9.2 Standard of Accommodation

One of the primary objectives of Policy DM17 is to ensure that HMOs provide satisfactory living conditions for future occupiers.

As demonstrated in Section 8 of this Statement, the proposal provides:

- five well-proportioned bedrooms;
- improved communal accommodation;
- adequate sanitary facilities;
- retained garden space;
- satisfactory internal circulation;
- a dedicated study.

Most importantly, the proposal removes an undersized bedroom from the existing arrangement and significantly enhances the communal accommodation available to occupiers.

Accordingly, the proposal represents a clear improvement in residential quality and satisfies the objectives of Policy DM17.

9.3 Impact upon Neighbouring Residential Amenities

The proposal would not materially affect the amenities enjoyed by neighbouring occupiers.

The application involves no external alterations and therefore introduces:

- no overlooking;
- no loss of privacy;
- no loss of daylight;
- no overshadowing;
- no increase in building bulk or massing.

The physical relationship between the application property and adjoining dwellings, therefore remains entirely unchanged.

The proposal also relates to a relatively small Class C4 HMO accommodating no more than six persons. Such occupation remains residential in character and is not materially different in planning terms from many larger family households.

Consequently, the proposal is not expected to give rise to unacceptable levels of noise, activity or disturbance.

9.4 Character of the Area

The proposal preserves the existing appearance of the dwelling.

No alterations are proposed to:

- the front elevation;
- the rear elevation;
- the roof;
- the building footprint;
- boundary treatments.

The property will continue to appear as a conventional dwellinghouse within the established residential streetscape.

There is therefore no visual evidence that the property is occupied as a small HMO.

The proposal would not erode the established character or appearance of Buller Road.

9.5 HMO Concentration

Policy DM17 also requires consideration of the cumulative impact arising from concentrations of HMOs.

Unlike a number of neighbouring authorities, Haringey does not prescribe a fixed numerical threshold above which planning permission should normally be refused.

Instead, each proposal is assessed on its individual merits, having regard to local circumstances.

A separate HMO concentration assessment has been prepared in support of this application.

That assessment considers the distribution of licensed HMOs within the road, together with the relationship between the application property and the existing pattern of residential occupation.

The assessment demonstrates that the proposal would not result in a harmful concentration of HMOs or materially alter the established character of the locality.

9.6 Refuse Storage

Appropriate refuse and recycling facilities are provided within the site as shown on the proposed site plan and are capable of serving the proposed level of occupation.

Refuse will be managed in accordance with the submitted HMO Management Plan, ensuring that bins are stored within the site and presented for collection only on designated collection days.

The proposal, therefore, satisfies the refuse management objectives of Policy DM17.

9.7 Cycle Parking

The proposal incorporates secure cycle parking for future occupiers, within the site, as shown on the proposed site plan

Given the highly accessible location of the site and its proximity to public transport, the provision of cycle storage supports sustainable travel choices and accords with the wider objectives of the London Plan.

9.8 Conclusion on Policy DM17

Having considered each of the relevant criteria, it is concluded that the proposal fully satisfies the objectives of Policy DM17.

The proposal:

- provides a high standard of accommodation;
- safeguards neighbouring residential amenity;
- preserves the character of the surrounding area;
- incorporates appropriate refuse and cycle storage;
- is supported by comprehensive management arrangements; and
- does not result in harmful over-concentration.

The proposal should therefore be regarded as fully compliant with the principal local planning policy governing Houses in Multiple Occupation.

10. HMO CONCENTRATION ASSESSMENT

10.1 A principal consideration when determining applications for Houses in Multiple Occupation within the London Borough of Haringey is whether the proposal would contribute towards a harmful concentration of HMOs within the surrounding area.

The purpose of this assessment is not to prevent HMOs in principle, but to ensure that the cumulative effect of such uses does not materially undermine the residential character of an area or result in an unacceptable imbalance in the local housing stock.

10.2 Unlike a number of neighbouring local planning authorities, Haringey does not apply a fixed numerical threshold when assessing HMO concentration under Policy DM17. Instead, proposals are considered on their individual merits, having regard to local circumstances, the existing pattern of development and the likely effect upon the surrounding neighbourhood.

This approach requires an evidence-based assessment rather than reliance upon arbitrary percentage thresholds.

10.3 To assist the Local Planning Authority, a separate HMO Concentration Assessment has been prepared and submitted in support of this application.

The assessment identifies licensed HMOs and known planning-approved HMOs within the surrounding area and considers whether the continued use of the application property would materially alter the existing pattern of residential occupation.

The methodology adopted within that assessment is intentionally robust and transparent, ensuring that the Council is able to evaluate the proposal using objective evidence rather than general assumptions regarding HMOs within Tottenham or the wider Borough.

10.4 It is important to recognise that the proposal relates to a relatively small Class C4 HMO accommodating no more than six residents.

The proposal does not involve the subdivision of the building into self-contained flats, nor does it constitute a large Sui Generis HMO. Furthermore, the revised internal layout reduces bedroom numbers and improves communal accommodation, thereby reducing the overall intensity of occupation within the property.

Accordingly, the proposal would not materially alter the established character of Buller Road nor introduce a scale of occupation that would be inconsistent with the surrounding residential environment.

10.5 The Applicant respectfully submits that the HMO Concentration Assessment demonstrates that the proposal would not result in a harmful over-concentration of HMOs within the locality and is therefore consistent with the objectives of Policy DM17.

11. IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA

11.1 The proposal would preserve the established character and appearance of Buller Road.

Unlike many planning applications involving residential conversion, the proposal introduces no alterations to the external appearance of the dwelling.

There are:

- no extensions;
- no dormers;
- no roof alterations;
- no new windows;
- no changes to the principal elevation;
- no alterations to the existing building footprint.

Consequently, the proposal will remain visually indistinguishable from the existing dwellinghouse.

11.2 The surrounding area is characterised by traditional terraced housing of consistent scale, form and appearance. The application property forms part of this established residential streetscape and will continue to do so following implementation of the proposal.

The proposal therefore preserves both the architectural character of the building and the wider townscape.

11.3 It is also relevant that occupation by six unrelated individuals within a Class C4 HMO does not, of itself, alter the appearance of a building.

The planning system distinguishes between the use of land and its physical appearance. In the present case, there is no physical manifestation of the proposed use that would adversely affect the visual amenities of the area.

Accordingly, the proposal gives rise to no harm in terms of design or townscape.

12. IMPACT ON RESIDENTIAL AMENITY

12.1 Policy DM17 seeks to ensure that HMOs do not give rise to unacceptable impacts upon neighbouring residential amenity.

Potential concerns generally relate to:

- noise;
- disturbance;
- refuse;
- parking;
- anti-social behaviour;
- intensified occupation.

Each of these matters has been carefully considered during the preparation of the application.

12.2 The proposal relates to occupation by no more than six residents.

Such an occupation remains residential in character and is not materially different from that experienced at many family dwellings occupied by larger households.

The daily activities associated with cooking, washing, sleeping and social interaction are entirely consistent with residential occupation and do not introduce commercial or institutional characteristics.

12.3 Importantly, the proposal incorporates a significantly improved internal layout that provides generous communal accommodation.

The availability of appropriate communal space reduces reliance upon bedrooms for daytime activities and assists in promoting a balanced and comfortable living environment.

This, in turn, helps minimise the likelihood of conflict between occupiers and supports the successful day-to-day management of the property.

12.4 The proposal is also supported by a comprehensive HMO Management Plan that establishes clear arrangements for:

- occupancy control;
- maintenance;
- refuse management;
- inspections;
- neighbour liaison;
- dealing with complaints.

These measures provide additional assurance that the property will be managed responsibly throughout its operation.

12.5 Having regard to the modest scale of occupation proposed, the absence of external alterations and the implementation of appropriate management arrangements, it is concluded that the proposal would not result in unacceptable impacts upon neighbouring residential amenity.

13. TRANSPORT, PARKING AND SUSTAINABLE TRAVEL

13.1 The application site occupies a highly sustainable urban location that benefits from excellent accessibility by public transport.

A range of bus services operate within convenient walking distance of the property, whilst nearby rail and Underground stations provide direct connections to Central London and surrounding employment areas.

The site therefore offers future occupiers genuine alternatives to private car ownership.

13.2 The London Plan seeks to encourage sustainable travel patterns through reducing reliance upon private motor vehicles whilst promoting walking, cycling and public transport.

The proposal supports these objectives.

Occupation by six residents does not equate to ownership of six private vehicles. Experience throughout London demonstrates that occupiers of small HMOs frequently rely upon sustainable transport, particularly where properties are located within well-connected urban areas.

13.3 Secure cycle parking is provided within the site, encouraging cycling as an alternative means of transport and further supporting the objectives of the London Plan.

13.4 Accordingly, the proposal represents a sustainable form of residential development that makes efficient use of existing infrastructure and accords with national and regional transport policy.

14. REFUSE AND RECYCLING

14.1 Appropriate refuse and recycling storage is provided within the site to serve the proposed six-person occupancy.

The storage area is capable of accommodating the necessary refuse and recycling containers without detriment to the appearance of the property or neighbouring amenity.

14.2 Refuse collection will continue to operate in accordance with the London Borough of Haringey's established collection arrangements.

The submitted HMO Management Plan includes procedures for ensuring that bins are presented only on collection days and returned promptly thereafter.

14.3 The proposal therefore provides an appropriate and sustainable refuse management strategy consistent with the objectives of Policy DM17.

15. HMO MANAGEMENT

15.1 The successful operation of a House in Multiple Occupation depends not only upon its physical layout but also upon effective day-to-day management.

Recognising this, the Applicant has prepared a comprehensive HMO Management Plan to accompany the application.

15.2

The Management Plan establishes clear procedures relating to:

- maximum occupancy;
- tenant induction;
- periodic inspections;
- maintenance;
- emergency repairs;
- refuse management;
- neighbour liaison;
- anti-social behaviour;
- cleaning and maintenance of communal areas.

15.3 These management arrangements ensure that the property will be operated responsibly and provide additional safeguards for neighbouring occupiers beyond those secured through the planning process.

The proposal will also remain subject to the statutory HMO licensing regime, which provides a further level of regulatory control over the operation of the property.

Accordingly, the proposed management arrangements should provide the Local Planning Authority with confidence that the property will continue to be occupied in a responsible manner.

16. PLANNING BALANCE

16.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Having regard to the assessment contained within this Statement, it is respectfully submitted that the proposal accords with the Development Plan when read as a whole.

16.2 The proposal delivers a number of significant planning benefits, including:

- the reduction in bedrooms from seven to five;
- the removal of a substandard bedroom;
- the provision of a dedicated study;
- significantly enhanced communal accommodation;
- reduced internal intensity;
- improved living conditions for future occupiers;
- retention of the existing building without external alteration;
- preservation of the established street scene;
- contribution towards Haringey's supply of affordable shared housing;
- occupation in a sustainable urban location;
- professional management through an HMO Management Plan.

16.3 Any potential concerns associated with the occupation of the property as a small HMO are addressed through:

- the revised internal layout;
- improved communal accommodation;
- appropriate refuse storage;
- secure cycle parking;
- comprehensive management arrangements;
- the modest scale of occupation proposed.

Accordingly, no adverse impacts have been identified that would justify withholding planning permission.

16.4 When the proposal is assessed as a whole, the planning benefits substantially outweigh any perceived disadvantages.

The proposal, therefore, represents sustainable development for the purposes of the Development Plan and should attract significant weight in favour of planning permission.

17. CONCLUSION

17.1 This application seeks retrospective planning permission for the retention of **45 Buller Road** as a **five-bedroom, six-person Class C4 House in Multiple Occupation**.

17.2 The proposal has been carefully considered against the National Planning Policy Framework, the London Plan (2021) and the adopted planning policies of the London Borough of Haringey.

17.3 Unlike many retrospective HMO applications, the proposal does not seek to intensify occupation or maximise the number of letting rooms. Instead, it represents a significant qualitative improvement to the accommodation through the removal of one bedroom, the elimination of substandard accommodation, the creation of a dedicated study and the provision of substantially enhanced communal facilities.

17.4 These changes materially improve the standard of accommodation available to future occupiers and demonstrate the Applicant's commitment to providing a well-designed and responsibly managed HMO.

17.5 The proposal would preserve the character and appearance of the surrounding area, safeguard neighbouring residential amenity, provide satisfactory living conditions for future occupiers and contribute positively towards meeting the Borough's demand for high-quality shared housing.

17.6 For all of the reasons set out within this Statement, it is respectfully submitted that the proposal complies with the objectives of the Development Plan and represents a sustainable form of development. Planning permission should therefore be granted.