

4D PLANNING

Architecture | Town Planning

DESIGN AND ACCESS / PLANNING STATEMENT

Change of use of the first and second floor flat (Flat 17B) from a self-contained flat (Use Class C3) to a House in Multiple Occupation for up to 3 persons (Use Class C4). No external alterations.

Property Address: 17 Willoughby Road, London, N8 0JE.

September 2026

1.0 INTRODUCTION

1.1 This Design and Access / Planning Statement is submitted by 4D Planning on behalf of the applicant, Maria Giordmaina, in support of a full planning application for the change of use of the first and second floor flat (Flat 17B) at 17 Willoughby Road, London N8 0JE from a self-contained flat (Use Class C3) to a House in Multiple Occupation (HMO) for up to 3 persons (Use Class C4). No external alterations or changes to the internal layout are proposed. The ground floor flat (Flat 17A) is a separate planning unit and forms no part of the application.

1.2 Planning permission is required because the property lies within the area covered by the Council's Article 4 Direction of 30 November 2013, which removed permitted development rights for the change of use from Use Class C3 to Use Class C4 in 14 wards, including Harringay.

1.3 The application follows pre-application advice under reference PRE/2026/0202, in which the Council concluded that the proposal is acceptable in principle and complies with Policy DM17 of the Development Management DPD. The scheme submitted is unchanged from that considered at pre-application stage.

1.4 This Statement should be read with the location plan (WR01), block plan (WR02), existing and proposed floor plans (WR03 and WR04), the smoke and heat alarm plan (WR05) and the photographs accompanying the application.

2.0 APPLICATION PROPERTY AND SURROUNDING AREA

2.1 The property is a 2 storey mid-terrace Victorian house with a loft conversion on Willoughby Road, a residential street running between Green Lanes and Wightman Road in the Harringay ward. It was converted into 2 self-contained flats under planning permission HGY/1989/1000. Flat 17B occupies the first and loft floors and extends to 91.14 m² gross internal area.

2.2 At first floor level the flat comprises a kitchen (10.40 m²), living and dining room (19.83 m²), Room 1 (11.92 m²), bathroom (3.54 m²) and separate WC (1.27 m²). At loft level there are 2 further rooms, Room 2 (8.66 m²) and Room 3 (16.03 m²). Small balconies are provided to the rear at both levels.

2.3 The property is not listed and is not within a conservation area. The surrounding area is predominantly residential, made up of Victorian and Edwardian terraces, many of which have been converted into flats. Green Lanes district centre is a short walk to the east and Ducketts Common lies to the north-east. Turnpike Lane Underground and bus station (Piccadilly line) is around 250 m to the north and Hornsey rail station around 550 m to the west.

3.0 PROPOSED DEVELOPMENT

3.1 The proposal is for a change of use only. Each of the 3 rooms would be occupied by a single person, giving a maximum of 3 occupants, with the kitchen, living and dining room, bathroom and WC shared. The existing layout, external appearance and means of access are all retained, as the existing and proposed floor plans confirm.

3.2 Drawing WR05 shows the interlinked smoke alarms to the hallways, living room and each room and the heat alarm to the kitchen. Refuse and recycling storage and collection continue as for the existing flat using the Council's kerbside service.

4.0 PLANNING HISTORY

4.1 HGY/1989/1000: conversion into 1 x 1 bed and 1 x 3 bed self-contained flats. Approved 5 April 1990. The lawful use of the upper floors has been as a self-contained flat since that time and they have not been in use as part of a single family dwelling since.

4.2 HGY/2015/2014: single storey rear extension to the ground floor flat. Approved 2015, not implemented and now expired.

4.3 The Council's Private Sector Housing team has granted an Additional HMO Licence for Flat 17B (HAR-021156261440) for a maximum of 4 occupants in 3 households, confirming that the property has been inspected against the Council's HMO licensing standards. Enforcement enquiry ENF/2026/0083 was opened on 21 January 2026 following notification of that licence. This application regularises the planning position and will allow the enquiry to be closed. The occupancy sought is within that permitted by the licence.

5.0 PRE-APPLICATION ADVICE

5.1 The Planning Advice Note for PRE/2026/0202 assesses the proposal against each criterion of Policy DM17. The officer advised that criterion (a), the 120 m² floorspace threshold, applies to the conversion of purpose built single family dwellinghouses and is not applicable here because the property has already been lawfully converted into a self-contained 3 bedroom flat.

5.2 On criterion (b), the officer acknowledged concerns about the concentration of HMOs in Harringay ward but concluded that, given the lawful use as a flat, the change of use would not significantly alter the pattern or intensity of occupation and would not result in any material increase in adverse amenity impacts, including noise, refuse generation or wider pressures on the local environment.

5.3 The officer confirmed that the site has excellent access to public transport and local services (criterion (c)), that the accommodation, with a spacious living room, communal kitchen and separate bathroom and WC, would provide an acceptable standard of living without any alteration to the layout (criterion (d)), and that a kitchen would be provided within one floor of each bedroom and shared by no more than 3 households (criterion (e)).

5.4 The officer concluded that the proposal is acceptable in principle and complies with Policy DM17. The application has been prepared to meet the validation requirements listed in the advice note. Elevations, sections and a street scene have not been provided because no external works are proposed and the elevations are unchanged; the floor plans include a scale bar and dimensions as requested.

6.0 PLANNING POLICY

National Planning Policy Framework (August 2026)

6.1 The revised NPPF was published on 17 August 2026 and applies to decisions from that date. Policy S3 applies a presumption in favour of sustainable development and provides that proposals which accord with an up-to-date development plan and the national decision-making policies should be approved without delay. Policy S4 provides that proposals within settlements should be approved unless the benefits would be substantially outweighed by adverse effects. Policy HO7 gives substantial weight to homes that meet the evidenced accommodation needs of the community, and Policy HO1 identifies people who rent their homes as a group whose needs must be met. Policy L2 supports the effective use of existing buildings, Policy DP3 requires a good standard of liveability for existing and future

occupiers, and Policy TR6 provides that development should only be refused on highways grounds where impacts would be severe.

The proposal accords with these policies.

London Plan (2021)

6.2 Policy H2 supports additional housing through the more intensive use of existing buildings on small sites, Policy H10 recognises the need for a range of housing types including smaller homes for single person households, Policy D6 requires a good standard of accommodation, and Policy T6 supports car free development in well connected locations.

The proposal is not contrary to these policies.

Haringey Local Plan

6.3 The development plan comprises the Strategic Policies (2017) and the Development Management DPD (2017). Strategic Policy SP2 supports a mix of housing to meet local needs. Policy DM17 (Houses in Multiple Occupation) is the principal policy and permits HMOs within the Article 4 area where: (a) the gross original internal floorspace of the existing dwelling exceeds 120 m²; (b) there are no significant adverse amenity impacts on the neighbourhood, including cumulative impacts from an over concentration of HMOs; (c) the site is accessible by public transport, cycling and walking; (d) high quality accommodation is provided, including internal space, amenity space and refuse storage; and (e) each household has exclusive use of a kitchen or space within a shared kitchen. Policies DM1 (design), DM12 (housing quality), DM31 (sustainable transport) and DM32 (parking) and the Council's HMO Standards are also relevant.

6.4 The Council's new Local Plan is at Regulation 18 stage, with Regulation 19 consultation expected later in 2026. It has not been examined and carries limited weight. The adopted 2017 policies remain the basis for determining this application.

7.0 PLANNING ASSESSMENT

Principle of the change of use

7.1 The property has been lawfully in use as 2 self-contained flats since 1990. The proposal does not involve the loss of a single family dwellinghouse, and the pre-application advice confirms that criterion (a) of Policy DM17 is not engaged. The flat is retained as residential accommodation, so there is no loss of housing, and the proposal provides shared accommodation for single people, a group with an evidenced need for lower cost private rented housing in the borough, which attracts substantial weight under NPPF Policy HO7.

Amenity and cumulative impact

7.2 A 3 bedroom flat can already be occupied by a family or by 2 unrelated adults without planning permission. Occupation by 3 single persons would not materially change the number of occupants, the level of activity or the demands on refuse collection. The ground floor is already a separate flat, so the proposal does not introduce shared accommodation into a street of single family houses and would not alter the balance of the housing stock. The Council's concern about HMO concentration in Harringay arises from the loss of family houses, which does not occur here, and the officer concluded that criterion (b) is met.

7.3 No external works are proposed, so there is no effect on the daylight, sunlight, outlook or privacy of the adjoining properties. Occupation by up to 3 persons is not expected to cause undue noise or disturbance to neighbours or to the ground floor flat, and the HMO licence imposes management obligations on the landlord.

Accessibility and parking

7.4 The site is within a few minutes' walk of Turnpike Lane station and bus station, Hornsey station and the shops and services on Green Lanes. The pre-application advice confirms excellent accessibility. The use is car free and no parking is provided or required; small HMOs in locations such as this generate little car ownership. There would be no severe impact on the highway network. Criterion (c) of DM17, Policies DM31 and DM32, London Plan Policy T6 and NPPF Policy TR6 are satisfied.

Quality of accommodation

7.5 The flat provides 91.14 m² for a maximum of 3 occupants, around 30 m² per person. Each room exceeds the 6.51 m² statutory minimum for a single person under the Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018, with Room 1 at 11.92

m², Room 2 at 8.66 m² and Room 3 at 16.03 m², and all occupants benefit from a 19.83 m² shared living and dining room and a separate 10.40 m² kitchen. The kitchen is within one floor of every room and is shared by no more than 3 households. A bathroom and separate WC are provided. All rooms have natural light and ventilation, fire detection is shown on WR05, and the rear balconies and nearby Ducketts Common provide amenity space. The grant of the HMO licence confirms that the accommodation meets the Council's licensing standards, and the officer concluded that criteria (d) and (e) are met.

Local precedent

7.6 The Council regularly approves HMO uses within the Article 4 area where Policy DM17 is met, including recent approvals close to the site at 78 Fairfax Road (HGY/2026/0532), 10 Frobisher Road (HGY/2026/0386) and 571 Green Lanes (HGY/2026/0063), and for existing flats at Flat A, 35 West Green Road (HGY/2026/0413) and Flat A, 701 Seven Sisters Road (HGY/2026/0273).

Conditions

7.7 The applicant would accept conditions limiting occupation to a maximum of 3 persons within Use Class C4, requiring compliance with the approved plans and requiring the fire detection shown on WR05 to be retained.

8.0 CONCLUSION

8.1 The proposal is a change of use only, with no external works. The lawful use of the property has been as 2 self-contained flats since 1990, so no family house is lost, and the Council's pre-application advice confirms that the proposal complies with Policy DM17 and is acceptable in principle. The accommodation is of a good standard and already licensed by the Council, the site is highly accessible, and there would be no harm to neighbouring amenity or the character of the area.

8.2 The proposal accords with the development plan and with the national decision-making policies in the NPPF (August 2026), which indicate that permission should be granted without delay. It is respectfully requested that planning permission is granted.