

Officer Report

Application Number:	HGY/2026/2106
Application Type:	Full planning permission
Address:	454 West Green Road, Tottenham, London, N15 3PT
Proposal:	Conversion from 2x one bed flats to 5 bed self-contained rooms HMO (5 persons).
Case Officer:	Adam Silverwood
Valid Date:	23/07/2026
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Applicant:	Mrs Mehmet
Agent:	Mr Ashley Gopee

RECOMMENDATION

Refuse

1. Proposed Development

This is an application for the change of use of two one bed flats and one studio apartment to 5 bed HMO with self-contained kitchen and bathroom.

2. Site and Surroundings

The application site is located above a commercial premises, located within the West Green Road Local Centre. The wider street consists mainly of small to medium scale shops with flats above.

3. Relevant Planning and Enforcement History

HGY/2022/2036 - Amalgamation of two separate ground floor commercial units at 454 and 456 West Green Road to form one restaurant within the E Use Class. – Approved with Conditions: 12/09/2022

HGY/2021/3121 - Amalgamation of two separate ground floor commercial units at 454 and 456 West Green Road to form one restaurant within the E Use Class. – Approved with Conditions: 12/09/2022

5. Local Representations

The application has been publicised by way of letters sent to neighbouring properties. One representation was received from neighbours in objection to the proposed development.

The submitted objection considered that the development:

- Would result in a loss of family sized accommodation
- Be detrimental to Community Cohesion
- Be detrimental to the amenity of future residents due to noise and disturbance
- Have a negative impact on the character and appearance of the area

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
5. Transport and Recycling

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.

Policy DM17 of the Haringey Development Management (2017) allows the conversion of larger homes to HMOs. However, such conversions are only permitted where, amongst other things, the internal floor space of the original (un-extended) dwelling is greater than 120sqm.

It is also important to highlight that Policy DM17 refers to the "original" gross internal floor area, which is the gross internal area of the existing dwelling when it first came into existence or as it existed on 1 July 1948.

Comment: The proposed development would be 118 sqm and is therefore considered to not comply with the requirements of part A of policy DM17. As this application involves the conversion of 3 individual properties, the measurement of the original floor space is taken as the whole application building including the entrance hallway.

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:

In response to the many problems associated with poor quality HMOs in the Borough, an Article 4 Direction was introduced in November 2013, which removed permitted development rights for conversion to small HMOs (3-6 unrelated people) within the east of the Borough as shown on Figure 3.2. The Article 4 Direction requires those wishing to change a single use dwelling unit (C3 Use Class) to a small HMO (C4 Use Class) within this area of the Borough to apply for planning permission. Therefore the acceptability of proposals for HMOs of six or more people anywhere in the Borough, as well as proposals for smaller HMOs within the east of the Borough, are required to be assessed against the above policy criteria.

Policy SP2 of the Haringey Local Plan Strategic Policies 2013-2026 (SLP) refers to providing homes to meet Haringey's housing needs and this is a general policy rather than being specific to the Family Housing Protection Zone. This policy is consistent with paragraph 62 of the National Planning Policy Framework (the Framework) which requires planning policies to assess and reflect the size, type and tenure of housing needed for different groups in the community, including, families with children.

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 2014 Strategic Housing Market Assessment (SHMA) (paragraph 10.35, 10.55) 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.

The Council's objective is to support the borough's vision for housing provision to build a stable, mixed and sustainable community by preventing the loss of family housing and this is articulated in policy DM17 'Houses in Multiple Occupation' of the Haringey Development Management Development Plan Document 2017. The Council's strategy, to bring a step change in housing provision and to prioritise family housing over smaller units, has been found sound through the public examination of the local plan. The policies need to be applied consistently in order for the strategy to have the best chance of being delivered. In 2021, the LPA commissioned a new SHMA, which reiterated similar housing needs.

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 up-to-date data.

The proposed development would result in the loss of two one bed, two person, apartments and one single bed studio. This would effectively result in the same quantity of persons.

One objection has been received that advises that the proposed development would result in a loss of family sized accommodation and would have a negative impact on the character of the area through an overconcentration of HMO's.

There are 30 properties within the same post code operating with HMO licenses out of a total 55 address, and 516 properties are recorded with a West Green Road address within Haringey's HMO register out of 864 properties. Both of these calculations would result in a concentration of over 10%. While it is appreciated that West Green Road is a suitable area for HMO's a concentration of 54.6% and 59% is considered to be detrimental to the amenity of existing occupiers and to erode the stock of existing family and other dwelling to an extent that is detrimental to the character of the area. While it is appreciated that these are 1 bed dwellings and a studio it is considered beneficial to preserve a mix of housing types in this location other than single room HMO's.

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Consulting the ONS Occupancy Rates, 28.3% of the properties at this location have less than the ideal rate of rooms and could be considered to be overcrowded. An increase in 4 single room

bedsits would be detrimental to the aims and objectives of policy DM16 and lead to a level of unacceptable overcrowding within the area.

While it is appreciated that this development would not result in the loss of a larger single family home, Haringey seeks to maintain a variety of tenures and this would nevertheless result in the loss of two adequate one bed apartments in favour of smaller accommodation serving the same number of persons that would lead to an overconcentration of HMO's. This smaller self-contained apartments would be detrimental to amenity and character of the area.

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

Comment: The application site is located within a Ptal 5 zone which is considered to have a very good level of accessibility to public transport. Two bus stops are located immediately outside the building and Turnpike Lane underground station is an 8 minute walk away, while Haringey Green Lanes Overground Station and Haringey Rail Station are located at a 17 and 21 minute walk away.

There is no cycle parking available at the site or shown on the submitted plans. Given the constraints of the site and its high standard of travel by sustainable means this is considered to be on balance acceptable and while having some provision for cycle parking would be desirable it is not considered to form a reason for the refusal in this instance.

The use of this property as an HMO is not considered to have any greater impact on parking conditions over previous use as a dwelling. A condition to ensure the secure cycle storage is provided for the beneficial use of future occupation of this HMO will be imposed. On this basis it is considered that the development would not result in any unacceptable impacts on highway safety or local parking conditions.

An HMO use of this size does not meet the threshold to be designed as 'Car Free', specifically as rented and HMO occupation generates much lower levels of car ownership than the general population. Equally there is also no evidence to show that an HMO would lead to more vehicle ownership and demand for on-street parking greater than that associated with any other large residential flat.

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.

All the rooms shown on the plans would meet the minimum space standards for a HMO of this type and is considered to be acceptable in this regard.

The rooms would contain a self-contained kitchen within each room that would be located at a suitable distance from the door with an adequately safe and practical layout. No details of the mechanical ventilation are provided.

All rooms are shown within the plans to contain a single bed and are detailed within the design and access statement as being single person bedsits. The minimum space requirements for rooms containing kitchen facilities are 13m² for a single person letting and 20m² for a two-person letting.

Room	Size (m ²)	Amenity Space
1	17	N/A

2	13	N/A
3	15	Yes – 10.5 m ²
4	13	N/A
5	15	N/A

Apartments one, two and four would have a single rear facing window, while the street facing apartments three and five would have a large two frame window. Room 3 would further benefit from the access to the terrace.

The proposed single bedsits are considered to provide the expected minimum room sizes for a single person bedsit accommodation. No amenity space is provided for the flats other than flat no.3 which has a generous amount of amenity space at 10m².

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

Comment:

All the proposed bedsit unit would be self-contained and have access separate kitchens.

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 contribution 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.

Matters relating to the operation of the HMO have been considered earlier within this report. One roof terrace is to be retained that was previously available to the first-floor street facing flat. This is an existing arrangement is common for properties such as this along West Green Road.

One objection has been received that considers that the proposed development would be detrimental to neighbouring amenity through an increased noise and other disturbance. The intended persons occupancy would not be greater than already existing and therefore this is not considered to create a significant increase in noise generation at this property.

This application does not propose any external amendments to the property or contribute to an over concentration of HMO's in the area and is therefore considered to be acceptable with regard

to the aims and objectives of Haringey DMD policy 17 and is recommended for approval on this basis.

Waste & Recycling

The application is accompanied by a design and access statement that advises that the proposed development would not lead to a material increase in waste generation from the change of use, as well as advising that refuse and recycling materials would be stored internally presented for collection on council collection days, with residential waste remaining separate from the commercial unit on the ground floor.

The location of storage of the waste is not detailed on the plans, the location of the street collection is identified within the design and access statement as being immediately outside the entrance to the building. Officers are unsure of the exact storage methods for household waste as no wheelie bins or similar are indicated on the plans.

The proposed development is not considered to provide sufficient accommodation for waste for 5 self-contained bedsits. The waste generation from 5 independent households is considered to be greater than that of the existing 2 one bed flats and studio that are currently existing and without proper identification of storage are considered to be detrimental to neighbourhood amenity through the accumulation of waste and to provide an insufficient standard of accommodation in this regard. This forms a reason for the refusal of this application.

Conclusion

The proposed change of use from two one bed flats and one studio apartment to 5 self-contained room HMO's is considered to result in the loss of 2 one bed room dwellings as well as contributing to an overconcentration of HMO's in the area, to not meet the necessary internal space standards for the property as a whole and to not make sufficient accommodation for storage and removal of its refuse and is therefore recommended for refusal in this regard in accordance with Policy DM17 of the Haringey DMD (2017).

7. CIL Applicable

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

8. Recommendation

That planning permission be **REFUSED** for the following reason:

1. The proposed change of use from two one bed flats and one studio apartment to 5 self-contained room HMO's is considered to contribute to an overconcentration of HMO's in the area, to not meet the necessary internal space standards for the property as a whole and to not make sufficient accommodation for storage and removal of its refuse and is therefore recommended for refusal in this regard in accordance with Policy DM17 of the Haringey DMD (2017).

Refusal Reasons:

The proposed change of use from two one bed flats and one studio apartment to 5 self-contained room HMO's is considered to contribute to an overconcentration of HMO's in the area, to not meet the necessary internal space standards for the property as a whole and to not make sufficient accommodation for storage and removal of its refuse and is therefore recommended for

refusal in this regard in accordance with Policy DM17 of the Haringey DMD (2017), the London Plan (2021) and NPPF (2026).

Informatives:

HUMAN RIGHTS and THE EQUALITY DUTY

Under the Human Rights Act 1998, it is unlawful for a public authority to act in a manner that is incompatible with the European Convention on Human Rights. A decision to take enforcement action would engage the landowners' (and occupiers') rights under Article 1 of the First Protocol (Protection of Property), Article 8 (right to respect for private and family life) and Article 14 (Prohibition of discrimination). However, this recommendation is in accordance with the laws governing the Planning System, in that it would pursue the legitimate aim of protecting the environment via the application of the Council's Planning Policies. It is proportionate to pursue the aim of protecting the environment in this case because they are not outweighed by any of the engaged rights. Section 149(1) of the Equalities Act 2010 provides that, a public authority must, in the exercise of its functions, have due regard to the need to—

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under [the Equality Act 2010];
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The PSED must be considered as a relevant factor in making this decision but does not impose a duty to achieve the outcomes in s.149 which is only one factor that needs to be considered and may be balanced against other relevant factors. In making this recommendation, due regard has been given to the Public Sector Equality Duty and the relevant protected characteristics.