

# Officer Report

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| <b>Application Number:</b> | <b>HGY/2026/1240</b>                                                                                                                                    |
| <b>Application Type:</b>   | <b>Full planning permission</b>                                                                                                                         |
| <b>Address:</b>            | 92 The Avenue, Tottenham, London, N17 6TD                                                                                                               |
| <b>Proposal:</b>           | Change of use from 5 Bed Single Dwelling House (Use Class C3) to 5 Bed House of Multiple Occupation (HMO - Use Class C4) for a maximum of six occupants |
| <b>Case Officer:</b>       | Adam Silverwood                                                                                                                                         |
| <b>Valid Date:</b>         | 12/05/2022                                                                                                                                              |
|                            | 6                                                                                                                                                       |
| <b>Applicant:</b>          | Mr Paul Adu                                                                                                                                             |
| <b>Agent:</b>              | David Aaron                                                                                                                                             |

## **RECOMMENDATION**

### **Approve with Conditions**

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

This is an application for a change of use from a residential dwelling (C3) to a small House in Multiple Occupation (HMO) for a maximum of 6 persons (Use Class C4).

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

The application site is a two-storey terraced building located on the southern side of the Avenue. The site is not located within a conservation area but is located within a family housing protection zone as designated within the Haringey Development Management DPD (2017).

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

**HGY/2022/0316** - Erection of an outbuilding to provide a gym and home office/store for use incidental to enjoyment of dwellinghouse (certificate of lawfulness: proposed use) – Approved with Conditions: 01/04/2022

**HGY/2025/0984:** Certificate of Lawfulness for change of use of property to Use Class C3(b) (small care home for children aged 13-17 with emotional and behavioral difficulties, up to four people living together as a single household and receiving care, including a permanent full-time resident carer) - Approved

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

The application has been publicised by way of letters sent to neighbouring properties. Two representations were received from neighbours, local groups, etc and one received from internal consultees.

One Objection was received from LBH Public Health Team that considered that the proposed development would not provide a large enough kitchen.

Two objections have been received from neighbouring properties that consider that the proposed development would lead to an overconcentration of HMOs within the area and would not provide sufficient standards of internal accommodation. These are considered within the relevant sections of this report.

## **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 Neighbouring 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.*

Comment: The original un-extended floor space of the property exceeds 120sqm, and is therefore 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.

DM 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. Permitting the appeal scheme was considered would erode the stock of smaller family dwellings that the policy seeks to protect and would 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 up-to-date data.

Two objections have been received that state that there is an overconcentration of HMO's within the area.

From reviewing a licensing register from May 2026 of HMOs within the borough, 10 properties were found to have additional or mandatory a HMO license within Avenue Road, N17. Using the Bricks & Logic website to review the number of properties within Avenue Road, 285 properties were identified of which 149 were identified as being houses and 136 as being flats. The number of properties within the street on this basis, the number of additional or mandatory HMOs at present is well below 10%, at 3.5%.

The Avenue is a large street and 5 of the properties operating as HMO's are located within this particular section bordered by Broadwater Road and Bruce Grove.

Streets do not exist in isolation, however, an examination of Broadwater Road and Bruce Grove that feeds onto The Avenue have 2 and 1 properties respectively operating as HMO's however these are not located near to The Avenue and are therefore not considered as relevant to the assessment of this part of the application. The concentration of HMO's along this section of The Avenue has been calculated as being 3.5% and is therefore considered to be on balance acceptable.

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 5 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.

An objection has been received by Haringey Public Health Officers which considers that the proposed kitchen would be too small to functionally store food. An assessment of the plans indicates that the proposed kitchen would be 25m<sup>2</sup> when including the associated dining room with counter tops of at least 1 metre. This is considered to be acceptable with regard to Haringey's HMO standards.

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.

There is an outbuilding as part of the existing property that is marked out as being for communal space for the occupants of the HMO. While this use is acceptable in principle, a condition will be placed upon this application ensuring that the outbuilding is not used as separate sleeping accommodation at any time.

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 rooms, 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.

This application does not propose any external amendments to the property or contribute to an over concentration of HMOs 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**

Four 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 meet the relevant requirements of policy DM17 for conversion into House of Multiple Occupation as well as the requirements of policy DM1 and DM12 and is therefore recommended for approval.

## **7. CIL Applicable**

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

## **8. Recommendation**

That planning permission be **APPROVED** with the following conditions:

### **Conditions:**

- 1 The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby permitted shall be carried out in complete accordance with the approved plans and drawings listed in this decision notice, other than where those details are altered pursuant to the conditions of this planning permission.

Location Plan  
Proposed Plans\_3.10.26  
Exg & Pro Outbuilding\_3.10.26

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3 The existing outbuilding as shown in approved document 03 A shall not be used at any time other than for purposes incidental to the residential use of the property known as '92 The Avenue, Tottenham, London, N17 6TD' and shall not be used as an independent dwelling or for sleeping accommodation/other purposes that could reasonably be provided within the main property, sold or let separately or for commercial purposes, without the prior approval in writing of the local planning authority.

Reason: In the interests of the amenities of the area and to comply with London Plan 2021 Policy D6 and Haringey Local Plan 2017 Policy SP2 which set out appropriate standards and requirements for all new dwellings.

**Informatives:**

INFORMATIVE: Land Ownership

The applicant is advised that this planning permission does not convey the right to enter onto or build on land not within his ownership.