

Hounslow Local Plan (2020-2041)

Examination

Stage 1 Hearings Note

Housing

Floorspace Conversion and Other HMO Considerations

February 2026



**London Borough
of Hounslow**

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1.0 Introduction

1.1 This section of the Housing Note responds to a request from the Inspectors during the Matter 3 hearing session (Meeting the Borough's Housing Needs) of the Stage 1 Hounslow Local Plan 2020-2041 hearings, held on Thursday 15th January 2026. The details of the tasks undertaken in this section of the Note are set out in documents requested by Inspectors in Hearings Week 1 Update February 2026 (**EX30a**)¹ as follows:

- Explain the 130sqm original footprint requirement for conversion of single-family home to a House in Multiple Occupation (HMO);
- Explain the departure from London Plan Policy H1 with regard to acceptable walking distances from amenities for HMOs, co-living, and purpose-built student housing;
- Explain and justify approach for acceptable walking distances for Specialist Older Persons' Housing.

2.0 130sqm original footprint requirement for conversion of single-family home to a HMO

2.1 In Question 6c) of Matter 3 Issue 2 of the Inspectors Matters, Issues and Questions (Document **IN03**)², the Inspectors asked, *Is the intended approach of not supporting conversion of residential properties that have previously been extended (or had outbuildings added) to create a total accommodation of at least 130sq.m, justified?*

The Council responded to this question in its written hearing statement for Matter 3 - Meeting the borough's housing needs (Document **WS3.1**)³. Following discussion during the Matter 3 hearing on 15th January, the Inspectors have asked for further clarification from the Council on this point. In particular, clarity has been sought on why the policy requirement states the *original floor area* of a property to be converted into a HMO must be 130sqm, whereby the conversion of properties that only achieve a total floorspace of more than 130sqm because of previous or proposed extension will not be supported.

2.2 It should be noted that the same threshold of 130 sqm is also applied in Policy SC6 (Managing Building Conversions and Sub Division of Existing Housing) of the Local Plan (Document **S1**)⁴, as well as the supporting text wording that explains that the conversion of

¹ EX30a – [Documents Requested by Inspectors in Hearings Week 1 Update \(February 2026\)](#)

² IN03 – [Inspectors' Matters, Issues and Questions for Stage 1 Hearings \(21 November 2025\)](#)

³ WS3.1 – [LB Hounslow Matter 3 Hearing Statement](#)

⁴ S1 [Hounslow Local Plan 2020-2041 Proposed Submission Version](#)

properties that have been previously extended to create at least 130 sqm will not be supported.

2.3 In response to the points raised by the Inspectors, the Council reiterates its concerns in relation to harmful over-intensification that could be detrimental to the residential amenity and character of the surrounding area, with reduced garden space (compared to that of the originally constructed building) for a more intensive residential use, giving rise to serious harmful impacts. In addition to these concerns, the Council also considers residential conversions that are implemented on plots that were originally developed at lower intensities prior to being extended can affect the mix and balance of communities and result in stress arising from harmful cumulative impacts to environmental quality, local amenity and parking capacity. This is particularly the case where numerous conversions of this nature may occur in the same vicinity.

2.4 It is also worth noting that the significant need for family sized homes in the borough is another important consideration that is taken account of in the approach to retaining this type of housing in Policy SC6. The Council’s response to Question 3c) of Issue 2 of its Matter 3 - Meeting the borough’s housing needs (**WS3.1**) provides further detail on the significance of this need in the borough, having regard to the evidence in the Local Housing Needs Assessment Update 2024 (Document **EBSC3**⁵).

2.5 The Council recognises that for clarity, it would be beneficial for the term, “*original floor area*” referred to in Part J of Policy SC10 and Part E of Policy SC6 to be defined in the Glossary of the Plan. A suggested Main Modification is therefore proposed to insert a new definition in the Local Plan Glossary, as shown below.

Modification code	Definition	Page	Modification	Reason for modification
To be determined in Document S11	Original Floor Area	475	Original Floor Area (for house conversions) <u>This is calculated so as to exclude any extensions, garages (including converted garages) outbuildings or loft conversions to the original (i.e. pre 1948 un-extended) property. The calculation excludes the area</u>	To provide clarification on how the original floor area of a property should be calculated for conversions when

⁵ EBSC3 [Hounslow Local Housing Needs Assessment update \(2024\)](#).

		<p>of outside walls but includes inside walls, partitions, cupboards and chimney breasts. Only the floor space of rooms with an existing headroom exceeding 2 metres in height is counted.</p>	<p>applying Policy SC6 Part E and Policy SC10 Part J.</p>
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2.6 The suggested Main Modification reflects the definition of original floor area (for housing conversions) that is applied in corresponding policies relating to residential conversions in other London Borough Local Plans, such as the Lambeth Local Plan 2020-2035 (Policy H6)⁶, the Wandsworth Local Plan 2023-2038 (Policy LP26)⁷, and the very recently adopted Lewisham Local Plan 2020-2040 (Policy H08)⁸.

3.0 Departure from London Plan Policy H1 with regard to acceptable walking distances from amenities for HMOs/Co-living

3.1 Policy SC10 of the Local Plan relates to Housing in Multiple Occupation (HMOs), Hostels, Bed & Breakfast and Temporary and Emergency Accommodation. Policy SC11 of the Plan includes policy approaches for large-scale purpose-built shared living (co-living) accommodation and purpose-built student accommodation, as well as build-to rent housing.

3.2 The Council notes that Policy H1 of the London Plan speaks in general terms about optimising housing capacity on sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary, however the Council does not consider this to set a hard and fast rule for all types of housing that may come forward. This position is supported by the fact that a number of recently adopted Local Plans in London include policy approaches to HMOs, co-living, and purpose built student accommodation that require proposals to be located either within PTAL zone 4 or higher, or be sited so future occupiers have access to a wide range of services and facilities within walking distance. These are discussed within sections 3 and 4 of this Note.

⁶ [Lambeth Local Plan 2020-2035](#)

⁷ [Wandsworth Local Plan 2023-2038](#)

⁸ [Lewisham Local Plan 2020-2041](#)

- 3.3 Certain localities within Hounslow, particularly in parts of the west and central areas of the borough, have in recent years been subject to high concentrations of HMOs at a neighbourhood level. The Council considers the approach to HMOs in Policy SC10 of the Plan would help ensure an appropriate distribution of HMOs in the borough, along with the protection of the amenity of neighbouring properties and the character of Hounslow's neighbourhoods.
- 3.4 Concerns arising from these concentrations of HMOs, amongst other related issues, led to a boroughwide Article 4 Direction that removes permitted development rights for change of use from a dwellinghouse (C3) to a house in multiple occupancy (C4), also known as small HMOs. The Direction came into force in September 2023.
- 3.5 An evidence base report was prepared in support of the Article 4 Direction⁹. Overall, the evidence indicated that the level of HMO conversions had reached the point where it was unsustainable, causing detrimental impact on local amenity and wellbeing. The Secretary of State's approval of the Direction provides an indication that Hounslow has a particularly high concentration of HMOs that requires careful management.
- 3.6 Furthermore, it may be useful to note that Hounslow Council has introduced additional HMO licencing requirements, also in relation to the specific circumstances surrounding HMOs and their significant presence in the borough. This was originally designated by the Council in August 2020 and following expiry in July 2025 was redesignated from December 2025¹⁰. These requirements are in addition to the mandatory HMO licencing requirements that apply by law across England. In determining that the continuation of the additional licencing requirements was necessary, the Council arrived at the conclusion that the management of a significant proportion of proposed additional HMOs is ineffective so as to give rise, or to be likely to give rise, to one or more problems either for those occupying the HMOs or for members of the public.
- 3.7 The Council adopted its Houses in Multiple Occupation (HMO) SPD (Document **SPD2**)¹¹ in November 2017. The SPD provides detailed guidance on the Council's HMOs policy in the adopted Local Plan (Document **ADP2**)¹² and has been and continues to be successfully

⁹ [Evidence Report - Article 4 Direction for Small HMOs](#)

¹⁰ [Additional Licensing Scheme 2025–2030 \(PDF\)](#)

¹¹ [SPD2 - Houses in Multiple Occupation \(HMO\) SPD \(2017\)](#)

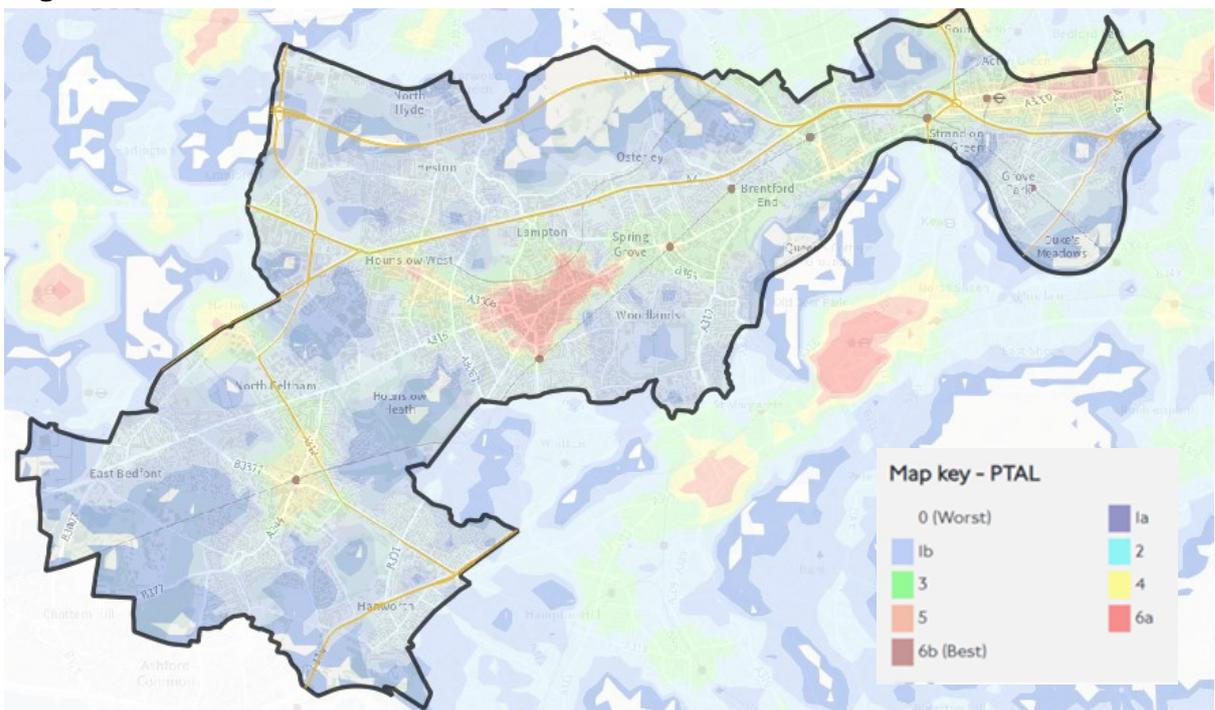
¹² [ADP2 - Adopted Hounslow Local Plan Volume 1 2015-2030](#)

implemented through the development management process. With regard to location and accessibility of HMOs, the SPD expands on the position in Policy SC10 of the adopted Local Plan, where in paragraph 3.4 it states,

“Proposals for HMOs need to be located within convenient walking distance of town centre facilities and good public transport links. Essentially this means that proposed HMOs that need planning permission should have at least a good Public Transport Accessibility Level (PTAL 4), and should be within a 400m walk of town centre facilities (meaning Metropolitan and District Centres – Hounslow, Chiswick, Brentford, and Feltham town centres).”

3.8 Another important factor the Council considers noteworthy is the extent to which in Hounslow PTAL 3 has geographic coverage compared to PTAL 4. As shown in Figure 1 below, PTAL 3 covers large areas in Hounslow, in parts of the borough most impacted by HMOs, such as Feltham and West Hounslow.

Figure 1 – Hounslow PTAL Zones



3.9 Given the good public transport access in PTAL Zone 4, the approach in emerging Policy SC10 would also help ensure that HMOs do not generate a need for car parking, and additional off-street parking provision, thus contributing positively to the borough’s neighbourhoods. If the policy approach were to extend acceptable locations to PTAL Zone 3, significant risk could be generated owing to the distance of such areas from transport

hubs and other services, increasing the likelihood of car usage and need for parking in affected neighbourhoods.

3.10 For contextual examples of the approach taken to acceptable walking distances from amenities for HMOs and co-living accommodation, the Council has reviewed other recently adopted Plans in London, noting their policy approaches with regard to these types of housing. Taking the first example, Part A4 of Policy LP29 - Housing with Shared Facilities, of the Wandsworth Local Plan (adopted in September 2023)¹³ states that HMOs will be supported where they,

“Have access to good levels of public transport (PTAL 4 or higher), and to shops and services appropriate to the needs of the intended occupiers”

In the supporting text to the policy, paragraph 17.42 adds further detail,

“Furthermore, as with other forms of higher density development, housing with shared facilities should be located in well-connected locations with good level of access to public transport (PTAL 4 or higher), including those supported by good walking and cycling infrastructure. It is also important that HMOs are sited so future occupiers have access to a wide range of services and facilities within a 15-minute walking distance.”

3.11 Taking the second example, Part A (c) of Policy H08 – Housing with shared facilities (Houses in Multiple Occupation), of the Lewisham Local Plan (adopted in July 2025)¹⁴ states that HMOs will only be permitted where they,

“Are appropriately located in areas that are well-connected to local services by walking, cycling and public transport;”

The supporting text at paragraph 7.72 then goes onto explain that,

“...as with other forms of higher density development, housing with shared facilities should be sustainably located in well-connected areas with good access to facilities and services.”

3.12 Considering a further example, Part A (v) of Policy H9 – Hostels and houses in multiple occupation, of the Lambeth Local Plan (adopted in September 2021)¹⁵ states HMOs will be supported where it is demonstrated that the accommodation,

“will be accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers.”

¹³ [Wandsworth Local Plan 2023-2038](#)

¹⁴ [Lewisham Local Plan 2020-2041](#)

¹⁵ [Lambeth Local Plan 2020-2035](#)

3.13 Having regard to all of these factors, the Council considers that as with other forms of higher density development, it is justified that housing with shared facilities including both HMOs and co-living accommodation should be located in well-connected locations with good level of access to public transport (PTAL 4 or higher), including those supported by good walking and cycling infrastructure. It is also important that HMOs are sited so future occupiers have access to a wide range of services and facilities within a 15-minute walking distance.

4.0 Departure from London Plan Policy H1 with regard to acceptable walking distances from amenities for Purpose-Built Student Accommodation

4.1 With regard to Purpose-Built Student Accommodation, the Council again considers there is reasonable justification for the Plan to include separate policy requirements that take into account the specific circumstances relating to this type of housing. As a starting point, the Council refers back to its response to Question 9a) of Issue 2 in the written hearing statement for Matter 3 - Meeting the borough's housing needs (Document **WS3.1**¹⁶), which explains the approach taken to establishing policy criteria setting out suitable locations for student accommodation in Policy SC11.

4.2 Policy H15 of the London Plan specifically concerns student housing and at Part B states, *“Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.”*

The Council considers that purpose-built student accommodation is a bespoke type of housing that warrants its own specific approach, including what constitutes an appropriate location for this type of accommodation. Specific circumstances surrounding student housing have been taken into account in the approach in Policy SC11, including the fact that student residents will have greater reliance on public transportation, walking and cycling. It is also the Council's view that it is important for Purpose-Built Student Accommodation to be sited so that student residents have access to a wide range of

¹⁶ WS3.1 – [LB Hounslow Matter 3 Hearing Statement](#)

services and facilities and, where possible, is located in proximity to the institutions that the development will serve.

4.3 To assist with this discussion, the Council considers it is of relevance to review examples of other recently adopted Plans in London, noting their policy approaches with regard to the location of student accommodation. In particular, it is noted that in two recently adopted Local Plans within London, the student accommodation policies have not replicated the approach in part B2a) of Policy H1 of the London Plan.

4.4 Taking the first example, Part A3 of Policy LP28 - Purpose-Built Student Accommodation, of the Wandsworth Local Plan (adopted in September 2023)¹⁷ requires that student accommodation,

“has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the student population”.

The supporting text at paragraph 17.38 then goes on to explain that,

“Purpose-Built Student Accommodation should be directed to well-connected locations with good level of access to public transport (PTAL 4 or higher), including those supported by good walking and cycling infrastructure. It is also important that Purpose-Built Student Accommodation is sited so student residents have access to a wide range of services and facilities within a 15-minute walking distance.”

4.5 Taking the second example, Part A (v) of Policy H7 – Student Housing, of the Lambeth Local Plan (adopted in September 2021)¹⁸ states,

“Proposals for student housing will be supported where it can be demonstrated that the development: ...is located in an area with good public transport access, and easy access to local shops, work places, services and community facilities...”

The supporting text at paragraph 5.50 then goes onto explain that,

“To be sustainable, sites should be located close to the institution they are intended to serve (reachable within 30 minutes) or otherwise have good public transport accessibility (Level 4 or above), and easy access to shops, services and community facilities...”

¹⁷ [Wandsworth Local Plan 2023-2038](#)

¹⁸ [Lambeth Local Plan 2020-2035](#)

4.6 In a further example, Part B of Policy H07 – Purpose-built student accommodation, of the Lewisham Local Plan (adopted in July 2025)¹⁹ states,

“Development proposals for PBSA must be appropriately located:

- a. At well-connected sites that are easy to access by walking, cycling and public transport;*
- b. Within or at the edge of town centres, or other locations that benefit from good provision of shops, services, leisure and community facilities appropriate to the student population;*
- and*
- c. Giving priority to sites located in proximity to the education facility the development is intended to serve, or other higher education institutions in the Borough.”*

Reference LPI10 of Table 19.1 in the Monitoring Framework then includes the following target for Purpose-built Student Accommodation,

“Delivery of PBSA developments in places that are, or are planned to be, well-connected by public transport (PTAL 4 and above).”

5.0 Suggested Approach for acceptable walking distances for Specialist Older Persons Housing

5.1 Following discussion during the Matter 3 hearing on 15th January, the Inspectors have asked the Council to consider a justification for departing from Policy H1 of the London Plan with regard to the location of Specialist Older Persons’ Housing including acceptable walking distances to town centre amenities and public transport. The Local Plan’s policy approach to specialist older person’s housing is included in Policy SC8 – Specialist and supported housing for older and vulnerable people.

5.2 Policy H13 of the London Plan sets out the strategic approach to Specialist Older Persons Housing and with regard to the location of sites, Part A2 states boroughs should take account of,

“the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure and health care, and being well served by public transport.”

5.3 Policy SC8 of the Regulation 19 version of the Local Plan states that we will achieve the policy’s approach to specialist housing for older and vulnerable people by,

¹⁹ [Lewisham Local Plan 2020-2041](#)

“...in cases where it is robustly demonstrated that nursing or care home accommodation is required, only supporting such proposals where they are appropriately located in an area with good public transport accessibility and of a high quality design...”

5.4 Following on from the discussion during the Matter 3 hearing, the Council considers it would be beneficial to provide some further clarification in Policy SC8 to set out what the policy considers is important for such accommodation to be located in close proximity of. It is also considered that additional wording should be included in the policy’s supporting text to indicate what constitutes an appropriate location in Policy SC8, and to provide further explanation and justification for why this is important in the context of specialist housing for older and vulnerable people. The Council therefore has produced two suggested Main Modifications; one for clarity in the policy wording of Policy SC8 and one to add new content to the supporting text of Policy SC8. These are set out in the table overleaf.

Modification code	Policy Map/ Figure	Paragraph/ Clause	Page No.	Modification	Reason for modification
To be determined in S11	SC8	After Part J (forms new Part K)	123	<u>K. Have access to good levels of public transport, and to shops, services and leisure facilities appropriate to the needs of the intended occupiers.</u>	For clarity in relation to suitable locations for Specialist and supported housing for older and vulnerable people.
To be determined in S11	SC8	Supporting text after paragraph 5.37 (insert new paragraph 5.38).	124	<u>5.38 Older and vulnerable people are generally more reliant on public transport, and without good access, living on their own can lead to isolation and loneliness. The location of specialist old persons accommodation and care and nursing homes in accessible locations is therefore important to ensure occupants are able to be as independent as possible and have easy access to key local services such as community and health facilities as well as local shops, which is key to their general health and well-being. This access should therefore be within a 15-minute</u>	To provide explanation for how Part K of Policy SC8 will be applied and to provide further details for the approach taken to establishing suitable locations for Specialist and supported housing for older and vulnerable people.

Modification code	Policy Map/ Figure	Paragraph/ Clause	Page No.	Modification	Reason for modification
				(400 metre) walking distance. As such, these types of accommodation will be directed to locations with a good level of access to public transport (PTAL 4 or higher).	