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To: Planning Department London Borough of Brent

Site: 934 North Circular Road, London NW2 7JR

Proposal: Change of Use of Two Residential Units (C3) to Two Separate 3-Person HMOs (C4)

Subject: Planning Application Submission – Change of Use to Two C4 HMOs

Date: 1 September 2026

1.0 INTRODUCTION

This letter accompanies the submission of a change-of-use application for the conversion of two existing residential units at 934 North Circular Road from Use Class C3 to two separate 3-person Houses in Multiple Occupation (Use Class C4). The purpose of this letter is to summarise the proposal and confirm that the submission meets Brent's validation requirements for change-of-use applications.

2.0 ARTICLE 4 DIRECTION — CONFIRMED EXEMPTION

The property lies within the Staples Corner Growth Area (SC13) and forms part of Site Allocation BEGA2, as identified in Brent's adopted Local Plan and confirmed through the Brent Interactive Policies Map. The site also sits within a designated Strategic Industrial Location (SIL) / Locally Significant Industrial Site (LSIS) corridor.

Under Brent's Article 4 Direction (confirmed 3 February 2022), permitted development rights for changes of use from C3 to C4 are removed *except* within:

- Old Oak & Park Royal Development Corporation Area
- Church End Growth Area
- All parts of the other seven Growth Areas, including Staples Corner

As the site is located within SC13, the Article 4 Direction does not apply to this address. Permitted development rights for C3 → C4 remain intact. The change-of-use application is therefore submitted to allow Brent Planning Authority to formally record and assess the proposed use.

3.0 PROPOSAL SUMMARY

The proposal seeks permission to convert the first- and second-floor residential units into two independent 3-person HMOs. Each HMO provides:

- Three single-occupancy bedrooms
- Private en-suite facilities
- A shared kitchen
- Clear internal circulation
- Fire-safe escape routes

All works are internal. No external alterations or extensions are proposed.

Cycle storage and refuse storage are provided at ground-floor level in accordance with Brent's standards.

4.0 PTAL AND TRANSPORT CONTEXT

The site has a Public Transport Accessibility Level (PTAL) of **2** (2023 rating), which is characteristic of the wider Staples Corner industrial corridor. Notwithstanding this moderate rating, the location benefits from strong practical accessibility due to its immediate proximity to multiple high-frequency bus routes operating along the North Circular Road, as well as safe walking access to nearby employment, services and local amenities.

The development also incorporates secure long-term cycle parking for six bicycles, and all residents will be bound by tenancy agreements that formally secure car-free occupation. Taken together, these measures ensure that the proposed HMOs function as a sustainable, low-impact residential use that does not generate additional parking demand or place pressure on the surrounding highway network.

5.0 COMMUNAL SPACE AND AMENITY

Brent's HMO guidance advises that a three-person HMO should ordinarily provide around 15–16 m² of internal communal space, calculated at approximately 5 m² per resident and including the kitchen. While the shared kitchen areas within the proposal do not reach this full threshold, the development delivers a significantly enhanced standard of private amenity that compensates for the reduced communal provision. All bedrooms substantially exceed the minimum 7.5 m² requirement, with each room providing over 10 m² of usable floorspace together with a private en-suite bathroom.

This arrangement reduces internal movement, improves privacy, and ensures that each occupant benefits from a high level of self-contained amenity. The overall internal layout has been designed to exceed minimum standards and to provide a calm, functional and high-quality living environment. Taken together, these factors demonstrate that the proposal offers accommodation of a standard fully consistent with Brent's expectations for small HMOs and should therefore be considered acceptable.

6.0 CONCLUSION

The application is supported by all required documentation, including the Planning Statement, Fire Safety Strategy, Operational Statement, Waste Strategy, Transport Note, Minimum Space Standards Assessment, and full drawing package. The proposal represents a sustainable, well-managed and policy-compliant residential use within a designated Growth Area where flexible housing delivery is encouraged.

Should the Council require any further information or clarification, Prestige Planning & Building Services will be pleased to assist.

Kind regards,
The Planning Team

Prestige Planning Ltd