



Pre Planning Application Assessment Report

CONVERSION OF RESIDENTIAL HOME TO 6 SELF CONTAINED FLATS

64-66 Carlton Avenue, Kenton HA3 8AY

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Introduction & Site Context

64–66 Carlton Avenue in Kenton (Harrow HA3 8AY) is a pair of joined former dwellings currently classed as a C2 residential institution (a care home). The proposal seeks to change the use to C3 (dwelling houses) by converting the building into 6 self-contained flats. Only minor enlargement of the existing loft conversions is proposed, and the overall height remains two storeys plus a loft (no new full storey). The site is situated in a suburban residential street and is not in a conservation area, flood zone, nor subject to Article 4 restrictions. It includes off-street parking space for 3 cars, with plans for secure bicycle storage and bin storage on-site.

This report evaluates the likelihood of obtaining planning permission for the conversion, considering relevant Harrow Local Plan and London Plan policies, the change of use implications, housing standards (internal space, amenity, parking), and key planning issues such as design/character and potential overdevelopment. It also reviews local precedent cases of similar conversions on Carlton Avenue and nearby streets and concludes with a professional opinion on chances of success and risks.



Planning Policy Framework

Harrow Local Plan Policies (Development Plan)

Housing Conversions: Harrow's Local Plan supports the conversion of larger homes

to flats in principle, provided that a satisfactory standard of accommodation is achieved and the character of the area is respected. Policy DM 26 "*Conversion of Houses and other Residential Premises*" sets criteria for such proposals. It states that conversions to multiple homes will be supported "where they provide a satisfactory standard of accommodation and contribute positively to their surroundings", subject to several requirements. Key criteria from DM 26 include:

- **Minimum Space Standards:** All new flats must meet the London Plan's minimum internal floor areas (the nationally described space standards). The Harrow Residential Design SPD reinforces that these space standards "*will be applied to all conversions in Harrow*" and help determine how many flats can fit within an existing building. In practice, the existing building's size must comfortably accommodate 6 flats that each meet or exceed the required floor area for their unit type (e.g. ~50 m² for 1-bed, 70 m² for 2-bed, etc., depending on number of occupants). Squeezing too many undersized units would conflict with this policy.
- **Layout, Aspect & Noise:** Converted flats should have a practical, fit-for-purpose layout (with adequate circulation and storage) and wherever possible be dual-aspect to provide good daylight and cross-ventilation. Single-aspect units are generally discouraged, especially if they would face only a rear parking court or other compromised outlook. The arrangement of rooms should also minimize noise transfer – e.g. stacking living rooms over living rooms and bedrooms over bedrooms between flats – to protect amenity for future occupiers. Sufficient sound insulation will be required by Building Regulations, but the design should inherently limit noise nuisance (Policy DM 26(b) and supporting SPD guidance).
- **Amenity Space:** Provision of outdoor amenity space is expected for all new dwellings, even in conversions. Per Policy DM 27 "*Amenity Space*", residential proposals should provide appropriate private or communal garden space for the occupants. Harrow's guidance strongly encourages subdivision of the rear garden in conversion schemes so that each flat (especially ground-floor units and any family-sized units) has access to a private section of garden. In smaller schemes where establishing a management company for communal space is impractical, splitting the garden helps assign maintenance responsibility and ensure usability. The front garden is not considered usable amenity space in this suburban context (due to lack of privacy), so the existing rear garden should be leveraged. In this case, 64–66's combined plot offers a substantial rear garden which could be divided or partially shared to give all 6

flats some outdoor amenity. No flat should be left without access to a garden or terrace, unless justified by town-centre location (not applicable here).

- **Waste & Recycling:** A key practical issue in conversions is bin storage. Harrow provides each dwelling with three bins (refuse, recyclables, organics), so converting one house into flats multiplies the bins. For example, converting a single dwelling into two flats yields *“the need to accommodate six bins”*, which can clutter a forecourt. In this proposal, 6 flats might require on the order of 18 bins in total. The preferred solution per the Residential Design Guide SPD is to locate bins at the rear or side of the property (with a suitable path to move them on collection day). Only if rear/side storage is impossible (e.g. in mid-terrace houses) should bins be kept at the front, and then they must be carefully sited and screened. For 64–66 Carlton, there appears to be side access, so a bin storage area in the side/rear garden should be feasible and would be looked upon more favourably than lining 18 bins along the frontage. A condition can be expected requiring detailed waste storage plans in line with Harrow’s refuse storage standards.
- **Parking and Transport:** Policy DM 26 (criterion i) requires that conversions make adequate provision for parking and safe access, without creating dangerous or substandard vehicle crossings. At the same time, oversupplying parking that dominates the site should be avoided. Harrow’s Policy DM 42 defers to the London Plan maximum parking standards, which for Outer London areas like Kenton typically allow up to 1 car space per 1-2 bed flat (and slightly higher for 3+ bed units) as an upper limit. The proposal includes 3 off-street parking bays for the 6 flats (a ratio of 0.5 spaces per unit). This is below the usual maximum and reflects an intention to encourage some reliance on public transport. Sustainable travel measures (the promised cycle storage and the site’s ~0.6 mile walk to Kenton station and local bus routes) can help justify a lower parking ratio. The council will examine whether the local street network can absorb any additional on-street parking. Crucially, the design of the parking area must respect the street’s character: Harrow’s guidelines note that in suburban areas, front garden hardstanding for multiple cars can harm the streetscape. In fact, the Residential Design Guide SPD stipulates that on a typical semi-detached house plot, *“the provision of two or more car parking spaces on the forecourt, with minimal landscaping, will be unacceptable”*. As 64–66 is effectively a double-width plot, accommodating 3 cars on the front may be possible, but it must be broken up with soft landscaping and border treatments to avoid a completely paved frontage. The existing driveway arrangements (if any) will need redesign; a planning

condition for a detailed landscaping plan is likely. Additionally, at least one accessible parking bay should be provided or easily assignable, given London Plan requirements for disabled parking in new residential developments (10% of spaces). Cycle parking should meet London Plan minimum standards (likely 1 space per studio/1-bed and 2 per larger unit), which the proposal's mention of secure bike storage addresses. Overall, parking provision will be assessed for consistency with Policy DM 42 – i.e. not exceeding maxima and not causing undue on-street parking stress or highway safety issues.

- **Design & Character:** Even though this is a *change of use* with only minor external alterations, design policies still apply. Policy DM 1 requires all development to enhance the local character and respond to the area's appearance. Carlton Avenue and surrounding Kenton streets are characterized by 1930s semi-detached houses with coherent architectural features. The Harrow Residential Design Guide notes the borough's suburbs have a strong uniform character that should not be disrupted by poorly designed conversions. Therefore, any physical changes (new dormer extensions, additional entrance doors, vents/pipework etc.) must be sensitively designed in keeping with the original houses. The SPD specifically warns that using excessive or oversized extensions to facilitate more flats may indicate overdevelopment and will be unacceptable. In this case the proposal's loft expansion should remain subordinate – likely a modest dormer or mansard that does not raise the ridge height – to comply with Harrow's design guidance for roof alterations. Additionally, where houses are converted to flats, the number of front entrances should ideally remain as a single door (to maintain the appearance of one residence). Since Nos. 64–66 were two separate homes, there are currently two front doors; the council may permit retaining the two original doorways (each leading to a lobby serving some of the flats) as this could appear no different than the status quo. However, any proposal to add *additional* doors or conspicuous alterations on the principal elevation would likely be resisted under DM 26 and DM 1(g). Overall, the external look of the building should remain that of a pair of dwellings, preserving the character of the street.

Loss of a Care Home (Change of Use C2 → C3): Because the existing use is a care facility (Use Class C2), an important policy test is avoiding undue loss of social infrastructure. Harrow's Policy DM 29 "*Sheltered Housing, Care Homes and Extra Care*" part B explicitly states: "*The loss of care homes or sheltered housing will only be supported where it can be reasonably demonstrated there is no longer a demand for that use on the site.*". In other words, the applicant must show evidence that the care home is no longer needed or viable. Typically, this is demonstrated via a marketing

exercise – e.g. the property being advertised to care home operators for a substantial period with no success – and/or evidence of a surplus of care beds in the area. In this case, 64–66 Carlton Avenue is currently vacant (as a closed care home), which suggests it may have already ceased operation due to lack of demand or modern unsuitability. The applicant should provide supporting info such as the Care Quality Commission’s deregistration, the facility’s previous capacity and occupancy rates, and attempts to sell or lease it for continuing care use. If the building’s layout or condition no longer meets modern care standards (e.g. small rooms, lack of lift, etc.), that can further justify why reuse as a care home is impractical. The London Plan (Policy S2 on health and social care facilities) similarly resists the net loss of care accommodation unless it’s replaced or demonstrably unnecessary. Without such justification, the change of use could be a stumbling block – the council could refuse permission on grounds of losing a community facility. However, if robust evidence is presented that the home has been vacant and marketed for, say, 12+ months with no interest from care providers, and that residents’ needs are met by other new facilities, then complying with DM 29 should be achievable. (It is worth noting Harrow’s Core Strategy CS1 also resists loss of community facilities unless not needed.)

London Plan Policies

The London Plan (2021) forms part of Harrow’s development plan and provides strategic housing and design policies relevant to this proposal:

- **Increasing Housing Supply & Small Sites:** London Plan Policy H1 and H2 encourage boroughs to enable new housing on small sites (below 0.25 hectares), including through conversions, particularly in Outer London where gentle densification of suburban areas can contribute to meeting housing targets. The mayor’s housing targets assume some level of **conversion of larger homes into flats** as part of overall supply. Thus, the principle of converting an underused large dwelling (or in this case two dwellings combined) into multiple smaller homes aligns with London Plan objectives, provided that quality and character considerations are met. Harrow’s housing target is significant, and making more efficient use of an existing residential site within a built-up area is preferable to developing greenfield land – this is consistent with the London Plan’s sustainable growth approach.
- **Housing Quality and Standards:** Policy D6 (Housing Quality and Standards) requires all new housing units to meet the National Described Space Standard and to have functional layouts, adequate storage, floor-to-ceiling heights of at least 2.5m, etc. Since Harrow explicitly applies the London space standards to

conversions, each of the proposed 6 flats must comply with the minimum internal area and amenity space benchmarks in Table 3.1 of the London Plan. D6 and the Mayor's Housing SPG also emphasize dual-aspect design – developments should avoid single-aspect north-facing flats and should maximize the number of dual-aspect units. In a conversion, it may not be possible to make every flat dual-aspect due to the existing layout, but certainly units should not be solely facing a cramped rear lightwell or alley. Given 64–66 is a broadly rectangular building with front and rear facades, a clever subdivision can likely give many flats both a front and rear outlook. The plans should demonstrate how each flat achieves a good standard of natural light, ventilation, privacy, and mitigation of noise (both between units and from external sources).

- **Amenity and Play Space:** London Plan Policy D6 also expects that outdoor amenity space is provided (a minimum of 5 m² of private outdoor space for 1-2 person dwellings, plus 1 m² for each additional occupant, usually in the form of a garden, terrace, or balcony). For family-sized units (3+ occupants), access to some private garden or a large, shared garden is important. The proposal should specify how the garden will be allocated or shared to meet these needs. If any flat is envisaged as suitable for a family (e.g. a 2-bed 4-person unit), London Plan Policy S4 on Play and informal recreation would kick in: typically, developments with 10+ children must provide play space, but with 6 flats it's likely fewer than 10 child occupants, so formal play provision may not be mandatory. Nonetheless, a safe and secure communal garden area would enhance the scheme's attractiveness for residents.
- **Inclusive Design:** London Plan Policy D5 requires new housing to be designed for inclusive access. In practice, for a conversion of this scale, it means at least one ground-floor unit should meet M4(2) accessible/adaptable standards (step-free access, etc.) and incorporate visitable wheelchair access features if feasible. The existing building has a few steps at entrances; the design might need to add a ramp or level threshold at one entrance to accommodate disabled access. While full compliance with wheelchair housing standards (M4(3)) might be exempted due to being a conversion (M4(3) usually applies to new builds or large schemes), demonstrating a commitment to accessibility (wider doors, at least one step-free flat) will strengthen the application in line with Harrow's and the London Plan's equalities objectives.
- **Transport and Parking:** The London Plan's Policy T6 for outer London allows up to 0.75–1 space per 1-2 bed unit (and up to 1.5 for 3-bed) in areas with lower public transport access. Kenton Station (Bakerloo line & Overground) is

roughly a 10-minute walk from the site, and Northwick Park (Met line) is a bit further, so the PTAL is moderate. Providing 3 spaces for 6 flats is within maximum standards. The London Plan strongly encourages minimizing car parking in areas that are even moderately accessible to promote mode shift, so the council may find 3 spaces acceptable especially with the addition of cycle parking. Sufficient cycle storage (Policy T5) is essential – approximately 9–12 secure bicycle spaces total for 6 flats (assuming mostly 1–2-bedroom units) should be provided. The plan to include secure cycle storage is in line with this. Electric vehicle charging readiness for the car spaces is another London Plan expectation (20% active charging points, 80% passive provision in new developments), which can be conditioned.

In summary, strategic and local policies both permit residential conversions in this location, but stringent conditions apply to ensure quality and to safeguard local character and amenity. The key policy hurdles for this proposal will be justifying the loss of the care home (DM 29), meeting all housing standards (DM 26, London Plan D6), and demonstrating that 6 units is not an over-intensification of the site that would harm the area (DM 1, DM 26(E)). The following sections examine specific planning issues in more detail.

Key Planning Considerations

1. Principle of Development & Change of Use (C2 to C3)

As noted, converting the former care home into flats will only be acceptable if the loss of the care use is justified. The applicant should prepare a Care Needs/Demand Assessment. For example, if the care home closed due to lack of residents or failing standards, that should be documented. If alternative modern care facilities have opened in Harrow (or the operator consolidated elsewhere), that context can help show this specific site is no longer needed for C2 use. The council's decision will weigh this evidence under Policy DM 29(B). Provided the case is convincingly made (which is likely given the care home is currently vacant and was marketed for sale), the principle of reverting to residential use is sound – especially since the surrounding area is residential and the site had originally been two dwellinghouses. Re-use for housing (C3) is inherently compatible with the character of the area and indeed preferable to leaving a vacant institution. On balance, the change of use should be acceptable in principle, pending the evidence on care home demand. This kind of mixed conversion (from institutional back to housing) is not uncommon and generally aligns with planning objectives if no community need is undermined.

One related consideration: as a former care home, the building may not have an

existing garden that was much used by residents. Changing to C3 means future occupants will likely make full use of the garden and outdoor space (including potentially children playing, etc.). The intensity of use of the site could increase compared to the care home (which probably had a limited number of residents and staff with a more controlled routine). This is not a policy objection per se, but the council will consider the impact of a more “active” residential use on neighbours (noise, privacy). Six households coming and going, parking, and using the garden is still a relatively small-scale use, but it will be different from the previous use. Mitigation (like landscaping, fencing, designated bin areas, and possibly limits on hours for any outdoor communal activities if needed) can address any amenity concerns. Overall, if the care use loss is justified, the site’s use reverting to standard housing is appropriate for the locality.

2. Housing Density and Overdevelopment

Converting to 6 flats represents a significant intensification compared to the original 2 dwellings on the plot (or the 9-bedroom care home configuration). The density in terms of units will increase, though each flat will be quite small relative to a family house. The council will examine whether 6 units on this site constitutes “overdevelopment.” There is no strict numeric cap on unit numbers in conversions – it hinges on whether all the policy requirements (space standards, parking, amenity, etc.) can be satisfied without strain. The Harrow SPD cautions that “conversion of modest suburban houses to more than two flats frequently compromise one or more policy objectives”. In other words, many 1930s semis in Harrow can comfortably be split into 2 flats (typically one per floor), but pushing beyond that (3+ flats) often led to substandard outcomes in the past. However, 64–66 is effectively double-fronted and has a much larger volume than a single semi-detached house, so it may physically accommodate 6 flats of reasonable size. It already has two staircases (potentially), loft rooms, and a footprint that spans what was two homes. This gives some flexibility to distribute units across three levels (ground, first, loft). The proposal’s intention to keep extensions minimal is critical – relying on the existing envelope (aside from small roof dormers) means the building’s bulk stays consistent with the area. If the scheme had proposed large new rear or side extensions to create extra flats, it would likely be judged as overdevelopment. Indeed, the SPD explicitly states using large extensions primarily to squeeze in more units is unacceptable. Fortunately, the current plan avoids that: it is using the loft space more fully and re-partitioning internally rather than sprawling outward. This approach is more likely to be acceptable, as it maintains the building’s existing scale.

The unit mix should also be considered. Six flats will presumably be a mix of 1-bedroom and 2-bedroom units (perhaps even a studio). If all 6 were one-bedroom,

the occupancy level might be, say, 12 people total; if some are 2-bed, there could be small families in the mix, raising occupancy. Harrow doesn't explicitly require retention of family-sized units in conversions (some boroughs require one 3-bedroom unit in a conversion, but Harrow's policy is more flexible). However, providing at least one larger unit (2-bed), especially on the ground floor with direct garden access, is often looked upon favourably to ensure a diverse housing mix and to somewhat compensate for the loss of a large family home. We know from a recent local case – *15 Carlton Avenue* – that the council approved a conversion into 3 flats comprised of 1 x 2-bed, 1 x 1-bed, and 1 x studio. This indicates Harrow is amenable to creating smaller units as long as one of them can house a small family (the 2-bed unit). For 64–66, with 6 flats, a balanced mix might include 2-bed flats on ground and first floors and one-bed or studios in the loft. This would align with housing needs and reduce the appearance that it's just cramming in tiny bedsits. It would also help address Policy CS1 which seeks a range of unit sizes borough wide.

In summary, 6 units is on the higher side for a conversion in this area but not unprecedented. Whether it is "overdevelopment" will depend on the quality metrics: if all flats meet the space standards, have adequate light/ventilation, and the site can support the required parking and amenity space, then the quantity 6 itself is not a reason for refusal. The design team should be prepared to demonstrate through floorplans and elevations that the proposal delivers 6 high-quality homes without overloading the site. If during the application process the planning officers feel it's too intensive (for example, if some flats are borderline on space or if parking shortfall is causing issues), a reduction to 5 or 4 units might be suggested as a compromise. However, given the building's 9 existing bedrooms, 6 self-contained flats do not inherently sound unfeasible.

One gauge of intensity is the plot's amenity provision per unit. The rear garden will have to be shared among more households, so careful thought is needed on whether, for instance, ground-floor flats get private fenced gardens and upper flats get a communal section, etc. Overdevelopment might manifest in disputes over garden use or insufficient privacy if not handled. Another gauge is parking demand – if those 3 proposed spaces prove insufficient and many residents bring cars; overdevelopment would manifest in parking stress. Mitigation via a permit-free development (if a Controlled Parking Zone is ever introduced) or via site management (encouraging car-free households) could be considered.

The character of the area also factors into overdevelopment. If a single building generates far more comings-and-goings than typical on the street, neighbours might object that the quiet residential character is eroded. However, realistically 6 flats is not akin to an HMO or hostel – the intensity is still low (perhaps 10-15 occupants total). Day-to-day impacts like multiple delivery vans, visitors, or refuse on collection

day will increase somewhat, but not to a degree that obviously exceeds normal residential activity. The council will assess if any amenity harm arises to adjacent properties at Nos. 62 and 68 (such as noise from 6 separate households' activities or overlooking if new loft windows allow views that weren't there before). With suitable fencing, soft landscaping, and respectful placement of any new windows, these impacts should be mitigable.

In conclusion, the proposal can likely avoid an overdevelopment objection by adhering strictly to quality standards and demonstrating sensitivity to its context. The fact that other properties on Carlton Avenue have been converted (see Precedents below) will also help show that the street can absorb such changes incrementally without losing its residential character.

3. Design, Appearance & Character of Area

Maintaining the external appearance of the building and the character of Carlton Avenue is a key issue. Since the plan is not adding extra storeys or major extensions, the main visible changes will be any roof dormers for the loft flats, alterations to doors/windows, and the forecourt changes for parking.

Roof Alterations: The proposal mentions expanding the loft conversion slightly. Likely, dormer windows or small extensions of existing dormers will be added. Harrow's SPD and the London Plan (Policy D4) require roof additions to be subordinate and in keeping with the house's style. Dormers should be set within the roof slope (below the ridge and above the eaves) and aligned with existing windows. Given the property is a pair of semis, ideally any dormers on the front roof slope would be symmetric or minimal to avoid an eyesore. If dormers are only at the rear, the visual impact on the street is negligible (but still need to consider neighbours privacy for rear dormer windows). The council will likely be supportive of well-designed dormers that do not overwhelm the roof. Since the building already had some loft accommodation (perhaps a small dormer or rooflights for the staff room), building on that is reasonable. The applicant should check if planning permission was previously granted for those loft conversions; any new dormer larger than what Permitted Development would allow on a single dwelling will need explicit permission now since the building is *sui generis* (a care home) at present. In any case, a condition may be imposed that materials for any new dormer or roof extension match the existing roof (tiles, etc.) to ensure a harmonious look.

Facades and Entrances: As discussed, preserving a domestic façade is important. If possible, the conversion should be done in a way that from the street it still looks like two homes or one big home, rather than a block of flats. That means minimal new

meter boxes or pipework on the front elevation, maintaining landscaped front gardens, and not creating a visual clutter of multiple doors. The council's preference (from similar cases) is often to have *one main entrance door* serving all flats in a building. Here, because the building was two semis, it might be acceptable to have two entrance doors (one at No.64, one at No.66) each leading to a subset of flats (for example, 3 flats accessed via No.64 door and 3 via No.66 door). This could neatly divide the building internally and reduce the need for creating new openings. Planning officers will assess if that division works logically (e.g. one side could contain 3 flats and the other side 3 flats, each side with its own staircase). If instead the design calls for an internal interconnection and one unified entrance, then one of the doors might be closed off and replaced with a window or decorative feature to avoid a disused door. Either approach can be acceptable; what's important is the symmetry and rhythm of the frontage remains typical for the street.

In terms of architectural detailing, any refurbishment should restore or retain features (bay windows, porch, roof tiles, etc.) consistent with the 1930s style. The SPD notes that when doing conversions, replacement windows, doors or porches should *"reflect the prevailing local character and enhance, not disrupt, the streetscape."* This means uPVC windows of appropriate style, keeping any brick detailing or pebbledash consistent, etc. There is no indication that significant exterior alteration is needed aside from the loft, so this should be achievable.

Forecourt & Landscaping: The front yard will serve multiple functions now: parking for 3 cars, access to entrances, and possibly some bin presentation on collection day. A good landscaping scheme is crucial. Harrow will want to see that soft landscaping (grass, shrubs, hedges) is used to break up any new hardstand. As mentioned, expanses of paving are frowned upon. There may already be a driveway or paved area when it was a care home (perhaps for 2-3 car spaces). If it's already fully hardscaped, the opportunity arises to add green features like perimeter planting or a low front boundary hedge to improve the look. Reinstating or retaining a front boundary fence/hedge of appropriate height (typically 1m or less adjacent to highway) will help maintain the typical frontage character. The plans should ensure sightlines for cars exiting are safe (no high obstruction at drive edges) while still avoiding a sterile open parking lot look.

Rear Garden Privacy: With potentially multiple households using the garden, there is a risk of increased overlooking into neighbours' gardens or noise. The layout should, if possible, designate certain garden areas to specific flats (especially ground floor ones) with screening fences, so that there is an orderly use of space. Upper floor flats might have balconies or terraces proposed to give them private amenity; however, Harrow's guidance is cautious about new first-floor balconies or external

staircases because they can cause overlooking and are often visually intrusive. A better solution is ground-floor flats each get a patio portion of garden, and first/second floor flats share a section of garden at the rear (with an access pathway). Ground-floor occupants could be protected from intrusion by having their private gardens fenced off from any communal path. All of this should be shown in the plans – it addresses both amenity for residents and neighbours considerations. The existing boundary fences to adjacent properties should be at least ~2m high close-boarded or similar to ensure privacy and mitigate noise (likely a condition to maintain boundary enclosures).

In conclusion on design/character: if executed per policy, the conversion will appear subtle and respectful. A passerby should ideally notice little difference – perhaps a few extra cars and doorbells, but the building's form and front garden will remain in character. By meeting the detailed design guidance, the proposal can comply with Harrow's high design standards and preserve the suburban character of Carlton Avenue.

4. Residential Amenity Considerations (Future Occupiers and Neighbours)

This category covers the quality of life for the new flat residents (internal/external amenity) and any impacts on existing neighbouring residents:

- **Internal Space and Layout:** Each flat must have functional layouts (sufficient living space, bedrooms meeting at least the minimum sizes, etc.). The building's existing configuration (9 en-suite bedrooms) suggests many rooms are currently small. Some reconfiguration (knocking through to create living/dining areas, combining rooms for larger flats) will be necessary. Provided the national space standards are all met, the council will consider the flats to have adequate living space. The ceiling height in the loft flats will need checking – often loft rooms have sloping ceilings; the London Plan requires at least 75% of the area to have 2.5m height. If the loft doesn't meet this, the minor roof extension may be partly to increase headroom. Ensuring good outlook from each habitable room is also important – e.g. avoid any bedrooms with only a tiny skylight. If any basement or semi-basement exists (unlikely here), it shouldn't be used for habitable flats unless meeting light/ventilation standards. Overall, given the site and policy, one can achieve good-quality flats here, and that's a prerequisite for approval (Harrow will not approve dingy or cramped units)
- **Daylight/Sunlight:** The orientation of 64–66 (not specified, but assuming the street is roughly east-west oriented) will determine light. If the front faces

south and rear north (for instance), some flats might get less direct sun. However, dual aspect units would get both. A daylight/sunlight assessment is usually not required for a 6-unit conversion unless there's concern about overshadowing from extensions (which is minimal here). So likely not an issue.

- **Noise Insulation:** With multiple households, sound insulation between flats is critical. The Building Regulations Part E will enforce minimum sound transmission standards (for both airborne and impact noise). Beyond that, Harrow's SPD suggests thoughtful layout to minimize noise (e.g. avoid putting a living room or kitchen above a neighbour's bedroom). The plans should ideally show a stacking diagram where, for example, the living rooms in the flats above align with living or kitchen spaces below, and bedrooms over bedrooms, etc. DM 26 requires considering noise both between the new flats and towards neighbouring properties. The care home likely had some soundproofing (though perhaps not as stringent as required for separate dwelling units), so upgrades may be needed (like acoustic underlay for floors, partition insulation, etc.). The decision notice, if approved, may include a condition to submit a sound insulation scheme to ensure enhanced insulation between the flats and to the adjoining houses, especially since we're effectively converting what were party walls in semis into internal division walls. It's worth noting that *excessive noise from occupants* is unlikely to be worse than typical residential use if the building is well insulated – a care home might have been relatively quiet but also could have had staff activities at odd hours. Six flats introduce things like possibly music playing, TV, etc., but again normal household noise. As long as standards are met, this is considered acceptable living environment for all.
- **Neighbouring Properties' Amenity:** The immediate neighbours are likely No.62 (adjacent to No.64) and No.68 (adjacent to No.66) Carlton Avenue, as well as houses to the rear on another street (their back gardens abut this site). Potential impacts include:
 - **Overlooking:** New rear dormer windows could give views into neighbours' gardens or rear windows. This is common in residential areas; as long as the distance is typical (usually Harrow expects about 30m between directly facing windows for privacy, which in back-to-back gardens is usually met), it should be fine. The dormers should use opaque glass for any side-facing windows (if any) to prevent overlooking of next-door gardens. The front rooflights/dormers pose no privacy issue as they face the street.

- **Overshadowing/Outlook:** Since no major extension is planned, the building's bulk remains the same, so there is no new overshadowing of neighbours' property. The minor roof dormer likely won't significantly block light. The outlook of neighbours remains the two-storey building they've always known; nothing new there.
- **Noise/Disturbance:** Neighbours might experience a modest increase in activity – e.g. 6 different stereos or kitchens instead of 2, more people in the garden in summers, 6 sets of rubbish bins to potentially see/smell on collection day, and more cars potentially coming/going. These fall within the range of normal residential environmental effects. However, to be thorough, the council will consider if things like *lighting* or *car movements* could disturb neighbours. For example, parking in the front for 3 cars might result in headlights occasionally shining towards houses opposite at night – but that's typical on any street with driveways. As long as the parking layout keeps cars within the site and not encroaching on footpaths (ensuring no safety issues), it is acceptable.

If any neighbour amenity concerns do arise during the application (neighbours often comment on parking congestion or noise), the council will evaluate those against the benefits of additional housing. Mitigations like landscaping (trees or shrubs at the boundaries) can reduce noise and visual impacts. Since the site isn't in any specially protected zone, normal development tolerances apply.

In summary, residential amenity impacts are expected to be neutral-to-positive: future occupants will get new, quality homes with necessary amenities, and neighbours will see a vacant care home re-activated as housing, which should not cause undue harm if managed well. The project must simply adhere to the standards and perhaps incorporate a few design tweaks (like acoustic measures and proper screening) to fully satisfy Policies DM 1 and DM 26 on amenity and privacy.

5. Transport, Access and Parking Details

We touched on parking earlier; here we consolidate the transport assessment: The site fronts Carlton Avenue, which is a local residential road. There are likely existing dropped kerbs for drive access. No new vehicular access is proposed beyond utilizing the front drive. Visibility splays at the driveways must be adequate for safe egress of cars – any new landscape plan should account for keeping the area near the driveway entrance low. The provision of 3 parking spaces is below a typical requirement for 6 flats in a suburban area but is within London Plan standards and

reflects a balance between car ownership and promoting sustainable travel.

The Highways Authority (as a consultee) will check if on-street parking capacity exists in case any overflow happens. Currently, this part of Kenton West may not have controlled parking zones (CPZ), meaning residents could park on-street if needed. The risk is if many flats convert on the street, cumulative parking demand rises. We will examine precedent conversions in the next section – notably, No.15's approved scheme for 3 flats provided *zero* off-street parking in its plans (being a smaller site), which suggests the council might tolerate a shortfall if the impacts are minimal. In our case, having 3 spaces is a plus.

Additionally, cycle access should be straightforward – a path from the street to the bike storage (likely in the rear garden or a shed) should be shown, and it should be step-free to encourage use. For refuse collection, the distance from bin store to the kerb should not exceed (approximately) 20m to comply with waste collection standards; the design should ensure the bins can be moved that distance (perhaps by management company on collection days).

No dedicated Transport Assessment is needed for a 6-unit scheme, but the design and access statement can cover how the site is reachable by public transport (Kenton station ~10 min walk, multiple bus routes on Kenton Road within ~8 min walk) and how it promotes walking and cycling.

One possible condition the council might impose is a Construction Logistics/Management Plan given the site is in a narrow residential street – contractors will need to manage material deliveries and construction parking carefully to not obstruct traffic. However, as it's a relatively small project (mostly internal works), this is usually a minor concern.

Overall, from a transport perspective, the scheme appears acceptable and policy-compliant, assuming parking and cycle standards are met, and it does not lead to significant street parking issues. The Highways officer may request that the new flats are made ineligible for parking permits if a CPZ is introduced, as a precautionary measure (this has been done in other London boroughs for flat conversions to control overspill).

6. Precedent Cases in the Locality

Examining recent planning decisions on Carlton Avenue and nearby can provide insight into Harrow's approach and the proposal's prospects. Notably, Carlton Avenue has seen several conversions of single dwellings into flats over the years, with varying outcomes:

- **15 Carlton Avenue:** This is a recent approved example. In June 2019, Harrow Council granted permission for “*Conversion of dwellinghouse into three flats (1×2-bed, 1×1-bed, 1×studio); alterations to roof to form end gable, rear dormer, and insertion of rooflights...*”. The application (ref. P/1909/19) was handled under delegated powers and deemed acceptable. Key points from No.15’s case: it involved constructing a rear dormer and gable to create a loft flat, similar in concept to what 64–66 proposes, and it provided no off-street parking (relying on on-street parking). The approval indicates that if a scheme is well-designed and modest (three flats out of one house) the council can support it, even with limited parking, as long as the location can bear it. This precedent bodes well for our proposal, as 64–66 is larger and can arguably accommodate even more units proportionally. It shows the council does not object in principle to flat conversions on this street.
- **14 Carlton Avenue:** Next door to 15, No.14 has historically been converted into flats as well. According to land registry data and recent sales, No.14 comprises at least 4 self-contained flats (identified as Flat A, Flat C, Flat D, and a Ground Floor Flat in sales records). For example, Flat C, 14 Carlton Avenue was sold in Oct 2023 for £230,000, and other flats in that property have been sold or let over the past decade. This indicates that No.14’s conversion occurred some time ago (possibly pre-2010) and has since functioned as multiple dwellings. It sets a strong precedent on Carlton Ave for flat conversions – even a single semi-detached house was successfully turned into 4 units. The planning permission details for No.14 aren’t immediately available, but the existence of Flats A, C, D suggests an approved (or lawful) conversion, likely with a rear extension or loft conversion. The council has not taken enforcement action there, implying it meets standards or was grandfathered in. If one house can host 4 flats, the double plot at 64–66 hosting 6 flats is within reason by comparison.
- **42 Carlton Avenue:** This is another semi-detached property on the same street (number 42, HA3 8AY) that was converted into 3 flats in the mid-2010s. Evidence from Companies House filings shows addresses like “*Flat 3, 42 Carlton Avenue*” in use by 2017, confirming multiple flats at No.42. A construction leads bulletin also listed “*Conversion to 3 Flats*” at 42 Carlton Ave as a project around that time. It appears that application was likely approved under delegated authority (possibly around 2014–2015). There is no record of refusal or enforcement, suggesting it complied with policy. This precedent is very relevant: it shows the council permitting 3 flats per original semi-detached house on this street. By extension, two semis combined could yield $2 \times 3 = 6$ flats, which is exactly our proposal. Thus No.42’s case supports the

feasibility of 6 flats at 64–66, assuming similar design standards are met.

- **25 Carlton Avenue:** This property (No.25, across the street, HA3 8AX) has been split into 2 flats (Upper and Lower). Bricks & Logic property data notes “the building contains 2 flats” at that address. A leasehold sale of *Flat 1, 25 Carlton Avenue* was recorded in 2012. This suggests an approved or lawful conversion of a single semi into two self-contained flats. Two-flat (duplex) conversions are typically the most straightforward and have been quite common in Harrow. No.25’s successful conversion shows that the council accepts such developments on Carlton Ave when done properly. It likely involved minimal exterior changes and providing one parking space (if any).

39 & 39A Carlton Avenue: Number 39 was subdivided into at least two units, as indicated by an address “39A Carlton Avenue” which sold in 2006. The use of an “A” suffix implies a split property (often one flat gets the 39A designation). It’s an older example, but it further illustrates the pattern of conversion on this street.

47 Carlton Avenue: This case is instructive because it involved both permission and enforcement. In 2009, an application (P/0612/09) was approved to convert No.47 from a single dwelling into two flats (with some extensions/alterations). However, subsequently the owner created a third flat without permission, resulting in an enforcement notice. The enforcement action (ENF/0501/10) described the breach as “*the material changes of use of the dwellinghouse from a single dwellinghouse to use as three self-contained residential units*”. The council’s notice required ceasing use as 3 flats and either reverting to a single house or complying with the approved 2-flat scheme (it gave the option to “reinstate... into two self-contained units” as per the 2009 permission). An appeal was lodged, and in 2011 the appeal inspector allowed the scheme for 2 flats (essentially upholding the council’s stance that 3 was too many for that house). This outcome highlights a few points: Harrow will enforce against unauthorized over-intensification; they considered 3 flats in a single semi at No.47 to be over-intensive (given policy at the time) but were satisfied that 2 flats was appropriate (since they’d granted that). It underscores the earlier note that 3+ flats in one normal-sized semi can be problematic – in 47’s case, likely issues were substandard unit sizes or insufficient parking/amenity leading to refusal of the third unit. For 64–66, the parallel is that each half of the building could comfortably hold 2–3 flats. Indeed, combining the two halves for an integrated 6-flat scheme might actually be more efficient and better planned than squeezing 3 in each separately. The lesson from No.47 is to stay within what the property can

reasonably handle and not exceed policy limits – which our proposal seeks to do by proposing 6 in a double plot (rather than, say, trying to get 8 or 10 out of it, which would clearly be excessive).

- **4 Carlton Avenue:** At the very low-numbered end of the street, No.4 provides a cautionary tale. This was a single dwelling where the owner carried out an **unauthorized conversion into 2 flats plus built extensions**. In 2019, an enforcement notice (ENF/0326/15) was served for *“the material changes of use of the single family dwellinghouse to use as three self-contained flats (‘unauthorised use’)... and construction of a part single/two-storey side-rear extension (‘unauthorised development’)”*. The notice required the use to cease and the extensions to be removed (or rebuilt according to a permitted scheme). It referenced a planning permission P/0784/15, suggesting the owner had permission for some extension (perhaps to enlarge the house or create 2 flats) but built differently and created 3.

Ultimately, the enforcement was marked “DIS” (discontinued) in 2020, which may mean the owner complied by reverting to the approved plan (2 flats) or the notice was withdrawn after compliance. The take-away from No.4 is that the council is vigilant and will not tolerate unplanned flat conversions that don’t meet standards. However, they are open to granting permission for well-planned conversions (the existence of an earlier permission implies they were fine with 2 flats at No.4). For our project, going through the proper channels with a complete application and adhering to policy should avoid any such enforcement scenario.

- **Other Surrounding Streets:** While Carlton Avenue itself offers rich precedent, one can also look at nearby similar local roads (e.g., Uppingham Avenue, Leighton Avenue, etc.). While we haven’t detailed those, Harrow generally has allowed flat conversions on many corner plots and larger houses in Kenton and Harrow areas. Conversely, the council has *refused* some schemes that were considered harmful. For example, in mid-2019 an application to convert a house on Hunters Grove (in the wider Kenton area) into two flats with large extensions was refused. The description *“conversion of dwellinghouse to two flats... first floor side extension; single/two-storey rear extension; rear dormer... parking...”* was refused in June 2019. The likely reasons were overdevelopment due to the extensive additions and possibly inadequate parking/amenity. This contrasts with our proposal, which is not as physically intrusive. It reinforces that scale and design matter: modest conversions are approved (like No.15), while those reliant on heavy extensions or that disrupt the street scene can be refused.

In summary, precedent in the area is generally favourable to the concept of converting houses to flats. Carlton Avenue alone has multiple examples of approved conversions – including 2, 3, and 4-flat schemes in single dwellings – and the council has set conditions (via enforcement or policy) to limit overreach (like not allowing 3 in the case of No.47 but allowing 2). The proposal for 64–66, being effectively two houses' worth, aligns with these precedents. If anything, the history suggests that 6 flats here is plausible: it's equivalent to two semis each with 3 flats, which is on par with what we see at No.42 (3 flats) and the attempted No.47 (2 allowed, attempt at 3). Furthermore, none of the precedent approvals are known to have caused serious long-term issues – the street has absorbed them. We should, however, be mindful of any cumulative impact: if too many houses in the same stretch convert, there can be a tipping point (parking saturation or character change). As of now, Carlton Avenue still has a mix of single-family houses and a handful of conversions, so one more (even a double one) is unlikely to upset the balance.

Chances of Success & Recommendation (Professional Opinion)

Overall Prospects: The likelihood of obtaining planning permission for this conversion is fairly good – perhaps moderate-to-high – provided the application robustly addresses the policy criteria discussed. The proposal aligns with many planning objectives: it reuses a vacant building, adds to housing supply with a mix of unit sizes, and does so in a way that (on paper) respects the building's existing scale. Harrow's planning framework does not prohibit such conversions; in fact, it has policies to manage them, indicating an expectation that they will happen. The presence of successful local examples strengthens the case that the council is receptive to conversion projects in this area when well executed.

However, the outcome will depend on details and execution. Key factors influencing the success:

- **Quality of Design & Accommodation:** This is non-negotiable. If the submitted plans demonstrate all six flats meet or exceed space standards, have logical layouts, and the building alterations are minor and tasteful, the council is likely to support the scheme. The bar is high – any indication of cramped studios or awkward room arrangements could lead to refusal on quality grounds. Given that the applicant can design the layout basically from scratch (the care home use means internal walls can be reconfigured easily), there is an opportunity to create very acceptable flats. Engaging an architect

with experience in conversions and Harrow's design SPD will be important.

- **Justification for C2 Loss:** A well-documented justification report needs to accompany the application regarding the former care home use. If this aspect is glossed over, the council might hesitate. The applicant should ideally include data like how long the care home has been closed, efforts made to sell it as a going concern, correspondence with the council's Adult Services or care commissioners indicating no strategic need for this small home, etc. If such evidence is provided, meeting DM 29 will likely be a formality. If not, the risk is a policy conflict in principle.
- **Neighbour and Councillor Support:** While planning decisions must be policy-led, local sentiment can play a role, especially if the application goes to committee. We anticipate some neighbours may object – common concerns are “loss of family homes,” “too many flats in area,” “parking pressures,” “noise,” etc. We can pre-empt some of this by demonstrating through our plans and planning statement that those concerns are mitigated (e.g., parking survey if needed, sound insulation commitment, retaining the house's appearance, etc.). Given precedents, neighbours might not be caught off-guard by the idea of conversions, but some may still prefer the status quo. The planning officers will evaluate objections but if our proposal clearly complies with policy (which it can), objections may carry limited weight. It's useful to note that 64–66 as a care home likely generated its own traffic (staff shifts, visitors, ambulances occasionally) and was a quasi-commercial use; returning it to normal residential use could be seen as *less* intensive or at least more in keeping than the institutional use. We can make that case to assuage concerns.
- **Conditions and Possible Section 106:** If approved, expect conditions addressing things like materials (for dormers), landscaping (front garden scheme), boundary treatments, refuse storage details, cycle parking implementation, and an occupancy restriction that it remains C3 use (and not revert to a house in multiple occupation (HMO) without permission – an HMO would be a different use class). A Section 106 legal agreement is probably not required for a small scheme, since no affordable housing contribution can be sought under national policy for under 10 units, and any other contributions (e.g., tree planting or minor highway works) can usually be handled via condition or CIL. The development will be liable for the Mayoral and Harrow CIL (Community Infrastructure Levy) at the residential rate for any additional floorspace created (loft dormer area counts if new). This is a financial consideration but not directly a planning barrier.

Potential Risks: The main risks to approval can be summarized as follows:

- **Overdevelopment Concern:** If the council, in reviewing the plans, feels that 6 units just doesn't fit comfortably (perhaps if some units are barely at minimum size, or if amenity space per flat seems very limited), they might push back. This could result in a recommendation to reduce the number of flats. A refusal could occur under DM 26(E) which says proposals that are over-intensive or compromise the policy standards will be refused. To mitigate this, the scheme should perhaps slightly exceed minimum standards where possible, to show generosity of space and avoid the impression of over-cramming. For example, if each flat was, say, 5–10% larger than the minimum and if the garden allocation per flat is decent, it strengthens the case that 6 flats are fine. A Planning Officer might negotiate down to 5 flats if unconvinced – which is a scenario to avoid by doing it right from the start.
- **Parking/Highway Objection:** Although policy-compliant in numbers, a worst-case scenario is Highways officers objecting that 3 spaces for 6 units will exacerbate on-street parking and possibly road safety (if, say, cars end up parking on the pavement). If a parking stress survey of the area at night shows kerbside parking is near saturation, officers could be concerned. We might gather some informal data: Carlton Avenue is not a main road, and many homes have their own driveways, so street parking might not be fully used currently. Also, 64–66's frontage can probably accommodate 2 cars without blocking the footway even now; adding a formalized 3rd space should be okay if designed well. To be safe, the applicant could propose a Parking Management Plan or monitor – e.g., allocate the 3 spaces to specific flats (likely the larger ones) and encourage the others to be car-free tenants. In any event, a refusal purely on parking seems unlikely given London Plan policy to restrain car use, *unless* there is demonstrable evidence of a severe parking problem in the immediate area. The council might just note the shortfall and impose a condition for a Travel Plan or similar. Considering No.15's case with zero spaces was allowed, our provision of three should be seen as reasonable.
- **Technical Design Issues:** If the design required, say, an external staircase for upper flats or balconies that cause privacy issues, those could be points of contention. Right now, none are proposed – all flats will be accessed internally which is ideal. We should keep it that way (no ugly fire escapes, etc., on the outside). Fire safety (new London Plan Policy D12) will also need considering given multi-floor flats – a fire statement might be needed to ensure a safe evacuation strategy, but that is solvable with proper design (e.g., protected

stair cores, sprinkler if needed in a tall loft, etc.). This is unlikely to affect planning permission if building control compliance is shown to be feasible.

- **Conservation/Article 4 (none here):** The site not being in a conservation area is a relief – otherwise design scrutiny would be even stricter. Also, some boroughs use Article 4 to restrict conversion of single-family homes to flats in certain areas; Harrow does not have such an Article 4 on this location, so there's no in-principal ban. That's good – it means each case is judged on its merits.

Professional Recommendation: Proceed with the application but incorporate all the above considerations in the planning submission. Specifically, I recommend:

- **Create a Planning, Design & Access Statement** that systematically addresses each policy point (DM 26 criteria a–j, DM 29, DM 27, London Plan D6, etc.), showing compliance or how the design mitigates any issues. This narrative, backed with the detailed drawings, will make the case clear to the council.
- **Engage in pre-application discussions** with Harrow Council if possible. A preliminary meeting or written pre-app advice can be very useful to gauge the council's stance on 6 units and identify any concerns early. They might provide informal feedback on unit number or parking which could save time later. Given that precedents exist, the pre-app could confirm the acceptability in principle and focus on details to refine.
- **Prepare the evidence for care home redundancy** meticulously (as noted earlier). This should be included with the application (perhaps as an Appendix to the Planning Statement or a standalone Marketing Report). Without it, the case is weaker.
- **Plan for conditions:** Start thinking about landscaping, bin store design, and materials now so that those details can either be included up front or readily provided to discharge conditions later. For instance, identifying a discreet spot along the side for 18 bins (perhaps in 3 rows of 6 in a fenced enclosure or wheelie-bin store) and indicating that on plan will show the council we have a handle on the practicalities.
- **Community engagement:** It may be wise to speak to immediate neighbours (Nos. 62 and 68) before submitting, to explain the plans and perhaps alleviate their concerns (for example, assuring them that the building exterior will

remain in keeping and that fencing will protect their privacy, etc.). While not mandatory, this goodwill can sometimes reduce objections or at least show the council that we've been considerate.

Given all the above, my professional view is that planning permission can be achieved for the 64–66 Carlton Avenue conversion to 6 flats. The proposal is in line with both the development plan policies (after satisfying the care home demand test) and the trend of development in the area. The chances of success are high if the application is well-prepared and the design is policy compliant.

Risks of refusal primarily revolve around the number of units (if any unit falls short on standards or if officers feel it's one too many) and parking concerns, but these can be addressed with careful design and justification. In a worst-case scenario of refusal, the applicant would have the option to appeal to the Planning Inspectorate. Inspectors often take a balanced view, and given the positive precedents, an appeal could well succeed for a scheme that meets objective standards. The cost and delay of appeal, however, make it preferable to secure approval locally by tweaking the scheme as needed.

In conclusion, with adherence to Harrow's local policies (on quality, design, and mitigating overdevelopment) and the backing of London Plan standards, the conversion of this former care home into 6 flats stands a strong probability of gaining planning permission. It will be important to proactively manage the identified issues – especially demonstrating no harm to area character or neighbour's amenity – to ensure a smooth path through the planning process.

Pre Planning Application Research by Draw Plans Architectural Design Studio
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