

Planning, Design and Access Statement in support of a planning application to retain the use of the property as a small House in Multiple Occupation (HMO) at 1 Waycross Road, Upminster RM14 1LZ



October 2025

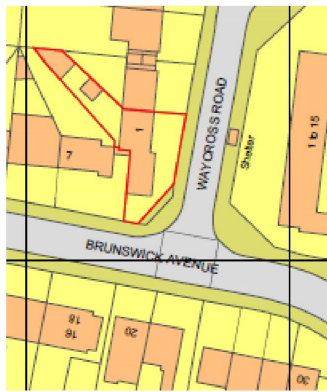
INTRODUCTION

1. This is a Planning, Design and Access Statement in support of a planning application to retain the use of the property as a small House in Multiple Occupation (HMO) at 1 Waycross Road, Upminster RM14 1LZ
2. The application is submitted in relation to a letter from the Local Planning Authority's Planning Enforcement Service on 11th September 2025 advising that planning permission was required for the existing use as a 4 bed 4 person HMO.
3. My name is Myles Joyce, I am a Chartered Town Planner with over 27 years postgraduate experience in Town and Country Planning in the UK and Eire. This retrospective planning application is submitted on behalf of Janet Olutu-Adegbuyi.

SITE AND SURROUNDINGS



Aerial Photo



Site Location Plan

4. The application site comprises a two-storey end of terrace House in Multiple Occupation (HMO) (Class C4), located at the corner of Brunswick Avenue and Waycross Road in a predominantly residential area of mostly two storey residential development. The existing layout is mostly semi-detached and short terraced housing although a flatted development, Brunswick Court lies opposite. Parking is provided to the front of the property and a private garden is located to the rear. As far as the applicant is aware there are no other HMO Licences along Waycross Road.
5. The property is located in a PTAL 2 area and is on a bus route linking it to Upminster Town Centre. The site is not located in a Conservation Area nor is it a listed building. The area is subject to an Article 4 Direction removing permitted development rights for changes of use from C3 to C4 HMOs since 13 July 2015.
6. The site is approximately 360 square metres in area. The existing dwelling has a floor area of approximately 150 square metres.

PLANNING HISTORY

7. There is no relevant planning history for the site.

PROPOSED DEVELOPMENT

8. It is proposed to retain the use of the property as a 4 bed HMO. The property benefits from a HMO licence with the Council for 4 persons and. No external changes are proposed and the property provides amply shared living areas notably a large kitchen, dining and living rooms and four large bedrooms on the first floor (one ensuite). An outbuilding is also in situ for utility use along with internal utility rooms. The garden will remain a shared amenity along with the hardstanding accommodating several off-street car parking spaces to the front.
9. The applicant would not that the latest Housing Delivery Test (HDT) in 2023 found that only 33% of the housing target had been delivered. There is an identified need for HMO accommodation in London as a whole.
10. The appellant now understands the Article 4 came into effect in 2015 well before the use of the property changed and therefore the need for retrospective planning permission.

THE POLICY CONTEXT

The NPPF

11. The NPPF was recently updated in December 2024 but the principle of sustainable development and high quality design most pertinent to the proposal remains as does the requirement of Local Planning Authorities to be positive and proactive.

The London Plan 2021

12. The supporting text to Policy D9 paragraph 4.9.4 of the London Plan states:
"Houses in multiple occupation (HMOs) are an important part of London's housing offer, reducing pressure on other elements of the housing stock. Their quality can, however, give rise to concern. Where they are of a reasonable standard they should generally be protected and the net effects of any loss should be reflected in Annual Monitoring Reports. In considering proposals which might constrain this provision, including Article 4 Directions affecting changes between Use Classes C3 and C4, boroughs should take into account the strategic as well as local importance of HMOs"
13. Policy T6 Residential Car Parking and related Table 6.1 for Outer London Borough with a PTAL rating of 2 then up to 1 parking space is required.

LB Havering Local Plan 2021

14. The local plan covers the years 2016-2031. As no external changes are proposed the proposal will be neutral with regard to Policies covering design, appearance etc.
15. Policy 8: Houses in Multiple Occupation recognises the valuable contribution to the private rental sector but cautions this needs to be balanced against the potential harm that can arise from such a development. Therefore HMOs are supported where they:
 - minimum original property size is at least 120 square metres
 - does not result in more than 10% of properties on the street being HMOs or more than 2 adjacent properties being HMOs

- does not have an adverse impact on the surrounding area and to give rise to significantly greater levels of noise and disturbance than would a single family dwelling of equivalent size
 - meets Havering's parking requirements and would not unacceptable impact on traffic in area
 - adequate secure and well screened refuse storage provided within the site
 - contains communal space including dining or living area large enough for all occupants to simultaneously use
 - proposal meets the requirements of East London HMO guidance
16. Policy 24 Parking Provision and design has a minim standard for aera with PTAL rating of 0-1 of 1.5 space per dwelling with 3+ spaces. The site has a PTAL rating of two spaces and would easily accommodate parking spaces for 4 persons

Location	Number of beds	Maximum parking provision*
Outer London PTAL 4	1 – 2	Up to 0.5 - 0.75 spaces per dwelling+
Outer London PTAL 4	3+	Up to 0.5 - 0.75 spaces per dwelling+
Outer London PTAL 2 – 3	1 – 2	Up to 0.75 spaces per dwelling
Outer London PTAL 2 – 3	3+	Up to 1 space per dwelling
Outer London PTAL 0 – 1	1 – 2	Up to 1.5 space per dwelling
Outer London PTAL 0 – 1	3+	Up to 1.5 spaces per dwelling^

*Where Development Plans specify lower local maximum standards for general or

Table 10.3 Residential Car Parking Standards (London Plan 2021) Reproduced for this statement

THE PROPOSED DEVELOPMENT AGAINST RELEVANT PLANNING POLICY

17. The proposed seeks to retain the 4 bed 4 person HMO (Use Class C4 use) from the current authorised use C3.
18. Turning first to Policy 8 the proposed development is acceptable in principle and would be supported by the LPA if it could either demonstrate to the best of our current knowledge that:
- An original floor area of approximately 150 square metres
 - Would not result in more than 10% of properties on the street being HMOs nor more than 2 adjacent properties being HMOs
 - With 4 persons maximum living in situ would not have an adverse impact on the surrounding area and to give rise to significantly greater levels of noise and disturbance than would a single family dwelling of equivalent size
 - Exceeds Havering's parking requirements and therefore would not unacceptable impact on traffic in area
 - Does provide adequate secure and well screened refuse storage provided within the site and if not the applicant is happy for a condition requiring details to be submitted for approval to be attached to any grant of planning permission.
 - contains amply communal space including dining and living area large enough for all occupants to simultaneously use and
 - as it is already licenced would meet the requirements of East London HMO guidance to the PA's satisfaction.
19. The applicant is confident that the requirements of all limbs of Policy 8 above are met.

20. The other most relevant planning policy, policy 24 requiring up to 15 off street car parking spaces is comfortably met as the site has a large area of hardstanding to the front for parking cars off street and a double garage.

Other matters

Housing Land Supply

21. The LPA have no up to date report on housing land supply but housing need is still significant and is not being met according to the latest HDT. The cost of housing and the need for often professional people to live in houses of multiple occupancy would therefore suggest there is a demand for such accommodation which Policy 8 of the Havering Plan and the London Plan tacitly recognises, the adequate management of the property is demonstrated by it holding a HMO licence.
22. The appellant would also argue that in the context of the proposed use the site is within a sustainable location on a bus route to the nearest town centre and its concentrated bus rail links and other amenities. Within walking distance are the Cranham Nature Reserve, Upminster Hall Playing Fields and Upminster Golf Club and churches schools and other professional services.

Flood Risk and Management and Drainage

23. The site lies within Flood Zone 1 and therefore is in the lowest category of risk from flooding. No changes are proposed to how surface and waste water will be disposed of.

Biodiversity Net Gain

24. The proposed retention of the existing use would not impact on the biodiversity value of the site and as such the applicant believes it is exempt from the BNG requirement.

Conclusions and the Planning Balance

25. The applicant has considered the merits of retaining the current small HMO use for up to 4 persons against the relevant Local Regional and National Planning Policy and Guidance and considers that the proposal is acceptable in principle, provides sufficient off street car parking and would not give rise to an unacceptable intensification of the use of the site adversely impacting the residential amenity of the occupiers of nearby properties.
26. In addition the continued use would provide needed and satisfactory living arrangements for private rent. IF there are any outstanding issues such as refuse services etc the applicant argues that these can be mitigated through the attachment of planning conditions
27. Thus on balance the proposal provides low cost housing in a relatively sustainable location with sufficient standard of living conditions and amenity space as well as access to services and amenities nearby. The proposal is considered to provide a modest economic benefit through local spend and social benefit through managed multiple occupancy with neutral environmental

impacts. As such the appellant respectfully asks that the appeal is allowed and planning permission granted.

Suggested Conditions

28. If the appeal is allowed the appellant is happy to consider the following conditions:

29. Notwithstanding the provisions of the HMO licence a management plan to be submitted to the LPA for approval within 2 months of the date of this planning permission including the following:

- Details of refuse storage to be submitted within 2 months of the date of this permission and the permitted details implemented within 1 month of the date of the approval and retained thereafter and the approved details implemented within 1 month of the approval and retained thereafter.

Myles Joyce MRTPI October 2025