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Design, Access and Planning Statement

Change of use from Class C3 dwellinghouse to Class C4 House in Multiple Occupation for occupation by up to three persons





Site Location:	201 Marlborough Road, Romford, RM7 8AP
Date:	12/10/26
Planning Authority:	London Borough of Havering

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1. Introduction

This Planning Statement has been prepared in support of a revised full planning application at 201 Marlborough Road, Romford, RM7 8AP.

Planning permission is sought for the change of use of the existing dwellinghouse from Use Class C3 to Use Class C4, providing a small House in Multiple Occupation for a maximum of three persons.

The property has previously been occupied as a small HMO. The present application seeks to regularise the planning position through a materially revised scheme comprising three bedrooms only. The room previously identified as Bedroom 4 is now expressly shown as a Study and is not proposed for use as sleeping accommodation.

No extensions, enlargement of the building or external alterations are proposed.

Planning permission is required for the C3 to C4 change of use because the property is subject to Havering's existing HMO Article 4 controls. London Borough of Havering

The revised application has been prepared specifically in response to the Council's refusal of application P0613.26, determined on 28 July 2026. Havering Development

2. Site and Surrounding Area

The application site comprises an existing semi-detached residential property on Marlborough Road within an established residential area of Romford.

The site extends to approximately 251.07 sqm.

The submitted drawings identify:

- Ground-floor GIA: 87.32 sqm
- First-floor GIA: 34.76 sqm
- Total existing GIA: 122.08 sqm

The existing accommodation comprises a living/dining room, kitchen, utility room, bedrooms, sanitary accommodation and associated circulation and storage areas.

The property benefits from an existing rear garden and frontage incorporating off-street parking/hardstanding. Existing vehicular and pedestrian access arrangements are retained.

The proposed block plan also identifies dedicated refuse storage and a cycle parking rack capable of accommodating six bicycles.

The proposal does not involve any alteration to the scale, massing, external appearance or footprint of the dwelling.

3. Planning History and Revised Scheme

Planning application P0613.26 sought permission for the change of use from Class C3 to a Class C4 HMO for up to four people.

The Council refused that application for three principal reasons:

1. the Council assessed the original dwelling as having a GIA of approximately 77.45 sqm, below the 120 sqm requirement within Havering Local Plan Policy 8;
2. Bedroom 4 measured approximately 6.5 sqm, below the 8.5 sqm standard identified for a single bedroom under the East London HMO Guidance; and

3. insufficient evidence had been provided to demonstrate that the HMO would not result in increased parking demand and parking congestion. Havering Development

The present application is materially different from the refused proposal.

The revised scheme:

- reduces maximum HMO occupancy from four persons to three persons;
- provides three bedrooms only;
- removes the former Bedroom 4 from sleeping accommodation;
- identifies that room as a Study;
- retains the existing off-street parking arrangement;
- retains/provides secure cycle parking for six bicycles; and
- is supported by additional parking evidence commissioned specifically in response to the previous refusal.

The revised scheme therefore directly addresses the accommodation and parking matters identified within Reasons 2 and 3.

4. Proposed Accommodation

The HMO is proposed for occupation by a maximum of three persons, with one occupier per bedroom.

The principal accommodation comprises:

Room	Floor Area

Bedroom 1	14.7 sqm
Bedroom 2	10.8 sqm
Bedroom 3	11.8 sqm
Living / Dining Room	22.4 sqm
Kitchen	10.9 sqm
Utility Room	4.0 sqm
Ground-floor Shower Room	5.6 sqm
First-floor Bathroom	5.0 sqm
Study	6.5 sqm

The former fourth bedroom is therefore not included within the proposed HMO sleeping accommodation.

The Study would remain ancillary to the three-person HMO and could provide additional workspace or general ancillary accommodation for occupiers.

The applicant would accept an appropriately worded planning condition limiting occupation to three persons and preventing the Study from being used as an additional bedroom, if considered necessary by the Council.

5. Planning Policy Framework

The statutory development plan includes the Havering Local Plan 2016–2031 and the London Plan.

Of particular relevance is Havering Local Plan Policy 8 – Houses in Multiple Occupation, together with policies concerned with residential amenity, highways and parking.

Policy 8 supports HMOs subject to specified criteria, including that the original property proposed for conversion should not be less than 120 sqm. London Borough of Havering

Other relevant considerations include:

- Havering Local Plan Policy 24 concerning transport and parking;
- London Plan Policy T6/T6.1 concerning car parking;
- the East London HMO Guidance;
- policies relating to residential amenity and design; and
- the National Planning Policy Framework, September 2026, which is the current national planning policy framework and a material consideration in decision-making.

6. Planning Assessment

Principle of a Three-Person HMO

The proposal retains the residential use of the property.

There would be no subdivision into self-contained flats, no extension and no increase in the physical size of the building. The property would continue to have the appearance and functional characteristics of a conventional residential dwelling.

The revised maximum occupancy of three persons represents the lowest level of occupation capable of constituting a Class C4 HMO and materially reduces the intensity of the proposal compared with the previously refused four-person scheme.

The internal layout also remains readily capable of functioning as a conventional dwelling in the future, with the proposal involving no irreversible physical subdivision of the family dwelling.

Original Property Floor Area – Response to Refusal Reason 1

The Council previously assessed the gross internal floor area of the original dwelling as approximately 77.45 sqm.

The submitted H-1040 measured drawings identify the current dwelling as having a total GIA of approximately 122.08 sqm.

It is recognised that the current floor area and the floor area of the original dwelling are separate considerations for the purposes of Policy 8. The present application therefore does not simply rely on the current 122.08 sqm measurement as demonstrating compliance with the original-property requirement.

However, the previous decision notice does not itself explain the detailed methodology by which the figure of 77.45 sqm was calculated.

The applicant respectfully requests that the Council undertakes a fresh assessment of the original floor area as part of the present application and considers the available historic and measured evidence when applying Policy 8(i).

The revised proposal is also materially less intensive than the previous four-person scheme. Only three occupiers are now proposed and the dwelling would not be physically subdivided or altered in a manner which prevents its future use as a family dwelling.

The Council is therefore requested to consider the floor-area issue alongside the materially reduced form of occupation and the overall planning merits of the revised proposal.

Standard of Accommodation – Response to Refusal Reason 2

The second reason for refusal has been directly addressed.

The former Bedroom 4 measured approximately 6.5 sqm and was considered unacceptable because it did not achieve the 8.5 sqm standard applied by the Council for a single-person bedroom.

That room has now been completely removed from the proposed sleeping accommodation and is clearly identified as a Study.

The proposed bedrooms are:

- Bedroom 1 – 14.7 sqm
- Bedroom 2 – 10.8 sqm
- Bedroom 3 – 11.8 sqm

Each proposed bedroom therefore comfortably exceeds the 8.5 sqm standard referred to within the previous refusal.

The property also provides substantial communal accommodation, including a 22.4 sqm living/dining room and separate 10.9 sqm kitchen.

Occupiers would additionally have access to a ground-floor shower room, first-floor bathroom, utility room, Study, storage areas and rear garden.

For a three-person HMO, the resulting accommodation is spacious and functional and provides a good standard of residential amenity.

The specific concern identified by the Council regarding Bedroom 4 has therefore been removed from the revised scheme.

Parking and Highways – Response to Refusal Reason 3

The previous application was refused partly because insufficient evidence had been provided to demonstrate that the proposal would not materially increase parking demand within the surrounding streets.

The applicant has consequently commissioned a parking survey specifically to address this matter.

The parking survey was undertaken following the refusal and its findings will be provided to the Council as supporting evidence for the revised application.

The revised scheme should also be considered in the context of the reduction in maximum occupancy from four persons to three persons, which further reduces the potential for vehicle ownership and associated movements.

Existing off-street parking at the property would be retained. No new or altered vehicular access is proposed.

The scheme also provides dedicated parking for six bicycles, substantially exceeding the number of proposed occupiers and enabling sustainable travel by residents.

The combination of a reduced three-person occupancy, retained off-street parking, substantial cycle provision and the supporting parking survey provides a substantially stronger evidential position than the previous application.

Residential Amenity and Intensity of Use

The proposal is limited to three occupiers.

Domestic activities associated with three adults sharing a dwelling would remain modest in scale and residential in character.

There would be no additional building mass, overlooking, loss of daylight, overshadowing or enclosure because no physical enlargement of the property is proposed.

The reduction from the previously proposed four-person HMO to three persons also reduces potential comings and goings and operational activity.

No separate refusal reason was previously raised regarding noise, disturbance, over-concentration of HMOs or unacceptable effects upon neighbouring residential amenity.

The revised proposal would therefore remain compatible with the residential character of the locality.

Character and Appearance

No external alterations are proposed.

The existing elevations, roof form, windows, doors and external materials would remain unchanged.

The dwelling would therefore continue to read visually as a conventional semi-detached residential property and the proposal would have no adverse impact upon the established character or appearance of Marlborough Road.

Refuse and Cycle Storage

The proposed plans identify refuse storage within the curtilage of the property.

A dedicated cycle rack accommodating six bicycles is also provided.

These arrangements provide practical facilities for a three-person HMO and assist in maintaining an appropriately managed residential environment.

HMO Licensing and Management

The applicant is separately progressing the statutory HMO licensing requirements applicable to the property.

The licensing and planning regimes perform separate functions; however, the licensing process provides an additional mechanism through which matters including property management, fire safety and occupation standards can be controlled.

The proposed planning arrangement is expressly limited to three occupiers, and the applicant is taking steps to ensure that the operation of the property reflects this revised arrangement.

7. Planning Balance

The revised application represents a materially reduced scheme compared with the previously refused proposal.

In particular:

- maximum occupation is reduced from four persons to three persons;
- the undersized fourth bedroom has been removed completely;
- all three proposed bedrooms exceed the minimum bedroom size previously applied by the Council;
- generous communal living and kitchen accommodation is retained;
- no extensions or external alterations are proposed;
- the property retains its conventional residential appearance;
- existing off-street parking is retained;
- six cycle parking spaces are provided; and
- additional parking evidence has been commissioned specifically to address the previous highway concern.

The remaining Policy 8 floor-area matter should be reconsidered through a fresh assessment of the evidence relating to the original dwelling rather than by reference solely to the previously stated figure.

The significantly reduced scale of occupation, absence of physical subdivision and retention of a layout readily capable of conventional residential occupation are also material considerations in assessing the overall effect of the proposal.

8. Conclusion

Planning permission is sought for the change of use of 201 Marlborough Road from Class C3 to Class C4 for a maximum of three persons.

The application has been substantially revised following the refusal of P0613.26.

The previous concern regarding the undersized fourth bedroom has been fully addressed by removing that room from sleeping accommodation and identifying it as a Study.

The parking concern is being addressed through dedicated parking evidence, together with the reduction in occupancy, retention of existing off-street parking and provision of six cycle spaces.

The application also provides an opportunity for the Council to undertake a fresh assessment of the Policy 8 original-floor-area issue against the evidence available.

Taken as a whole, the revised proposal provides a low-intensity form of shared residential accommodation, retains a high standard of living conditions for occupiers, involves no harmful physical development and responds directly to the matters identified in the previous decision.

The Council is therefore respectfully requested to consider the revised application on its individual merits and grant planning permission, subject to appropriate conditions including a maximum occupancy of three persons and retention of the Study as non-sleeping accommodation.