MIDIAN
ARCHITECTURE & BUILD

SUPPLEMENTARY PLANNING JUSTIFICATION AND COMPLIANCE STATEMENT

RETROSPECTIVE CHANGE OF USE FROM A SINGLE RESIDENTIAL DWELLINGHOUSE (USE CLASS C3) TO A SIX-PERSON HOUSE IN MULTIPLE OCCUPATION (USE CLASS C4)

59 WOLSELEY ROAD, ROMFORD, RM7 0BS

Prepared by: Midian Architecture

Local Planning Authority: London Borough of Havering

Planning Enforcement Reference: ENF/101/25

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1.0 ORIGINAL PROPERTY FLOORSPACE AND POLICY 8(i)

1.1 The applicant has undertaken a detailed review of the proposed development against Policy 8 of the Havering Local Plan 2016–2031, with particular consideration given to the original-property floorspace requirement of 120 square metres.

1.2 The design review has considered the existing accommodation, the proposed six-bedroom arrangement, the availability of communal facilities and the relationship between the intended use and the underlying objectives of the Council's adopted planning policy.

1.3 The applicant acknowledges that the existing building falls below the 120 square metre threshold identified in Policy 8(i). The architectural information currently identifies an existing floor area of approximately 105.66 square metres, with an alternative calculation of approximately 109.49 square metres arising during the drawing review. Neither figure reaches the policy threshold.

1.4 The applicant has therefore approached this matter as a question of planning justification rather than attempting to claim numerical compliance where the submitted measurements do not demonstrate it.

1.5 The design has been developed to make effective use of the existing building without extending its external envelope, increasing the number of bedrooms or introducing additional built development.

1.6 The revised arrangement establishes accommodation for a maximum of six individual residents, supported by a principal communal kitchen, living and dining room and a supplementary communal living room.

1.7 The applicant has considered the underlying purpose of Policy 8(i), namely the protection of smaller family dwellings and the maintenance of an appropriate housing mix within the Borough. It is recognised that the potential loss of family housing is a material planning consideration which must be afforded appropriate weight.

1.8 However, the applicant respectfully submits that a conflict with an individual development-plan criterion does not remove the statutory requirement to consider the proposal against the development plan as a whole and any other material considerations.

1.9 The proposed development would provide accommodation for six individual residents within the existing residential building, utilising the available internal space and retaining the building's established external character.

1.10 The application also includes a revised internal design which specifically prioritises the quality of communal accommodation. These are identifiable characteristics of the proposed development which should be weighed in the planning assessment.

1.11 The applicant has considered relevant appeal decisions concerning the interpretation and application of Havering's HMO policy, including appeal reference APP/B5480/W/25/3361306 relating to 64 Gelsthorpe Road, Romford.

1.12 That appeal demonstrates the relevance of considering the policy's underlying family-housing protection objective when assessing original-property size. The applicant acknowledges that the appeal was dismissed and that its particular circumstances differ from those of the present property. It is therefore not presented as establishing an exemption from the 120 square metre requirement.

1.13 The applicant's position is that the Council should undertake a proportionate assessment of the present development, including the identified policy conflict, the proposed occupancy controls, the residential accommodation provided, the absence of additional building mass and any demonstrable benefits associated with the proposed use.

1.14 The applicant respectfully submits that the development merits consideration within the statutory planning balance, notwithstanding the identified conflict with Policy 8(i). The precise weight attributable to that conflict must be assessed alongside the other relevant development-plan requirements and material considerations.

2.0 COMMUNAL ACCOMMODATION AND INTERNAL LIVING STANDARDS

2.1 The applicant has completed a comprehensive architectural review of the internal accommodation and prepared revised drawings establishing a defined arrangement for six individual residents.

2.2 The proposed design retains six bedrooms while establishing dedicated communal facilities distributed between the ground and first floors.

2.3 The ground-floor accommodation provides a designated kitchen, living and dining room measuring approximately 21.22 square metres.

2.4 The first-floor accommodation provides an additional communal living room measuring approximately 7.42 square metres.

2.5 Accordingly, the revised scheme incorporates approximately 28.64 square metres of designated communal accommodation.

2.6 The internal accommodation has been reorganised to provide a clearer distinction between individual sleeping accommodation and rooms intended for shared domestic activities.

2.7 The principal communal room is designated for cooking, dining and living activities, while the first-floor communal room provides supplementary living accommodation.

2.8 The revised design therefore provides two identifiable communal areas rather than relying exclusively upon individual bedrooms for residents' everyday activities.

2.9 The applicant has expressly incorporated this communal provision within the architectural scheme submitted for determination. The rooms are identified by their intended functions and are not proposed as additional sleeping accommodation.

2.10 The six-person occupancy limit is integral to the assessment of these facilities and provides a defined maximum number of persons who would use the communal rooms.

2.11 The applicant considers that the revised layout provides a more balanced internal arrangement and a meaningful improvement in the distribution of shared domestic accommodation.

2.12 The physical capacity of the principal kitchen, living and dining room to accommodate the required furniture, kitchen installation and simultaneous use must be assessed against the actual room dimensions. The submitted design establishes the intended room allocation but does not, by floor area alone, conclusively demonstrate every aspect of furniture and kitchen compliance.

2.13 The applicant is willing to accept an appropriately worded planning condition requiring both designated communal rooms to remain available to all residents and preventing their conversion into additional sleeping accommodation without the necessary planning approval.

2.14 The applicant respectfully submits that the revised internal organisation demonstrates a considered design response to the Council's concerns about communal living provision and represents a positive consideration in the assessment of the proposed residential environment.

3.0 BEDROOM ACCOMMODATION, ROOM SIZES AND OCCUPANCY CONTROL

3.1 The applicant has reviewed the proposed sleeping accommodation and prepared an internal arrangement comprising six individual bedrooms distributed across the ground and first floors.

3.2 The proposed scheme provides four ground-floor bedrooms and two first-floor bedrooms, each intended for occupation by one individual resident.

3.3 The drawings identify ground-floor bedrooms measuring generally approximately 8.50 square metres, with first-floor bedrooms measuring approximately 9.05 square metres and 9.24 square metres.

3.4 The applicant has deliberately retained the proposed six-bedroom arrangement without introducing additional letting rooms or seeking to accommodate more than six residents.

3.5 Each bedroom is intended to provide private sleeping accommodation and associated individual sanitary facilities.

3.6 The retention of en-suite facilities supports privacy and convenience by reducing reliance upon shared sanitary accommodation.

3.7 The proposed occupancy arrangement is clear and unambiguous. Each bedroom is intended for one resident only, and the maximum occupation of the property would be six persons.

3.8 The applicant considers this defined occupancy to be an important element of the scheme because it establishes the intended residential intensity and provides certainty regarding the number of people using the communal facilities.

3.9 The proposed bedroom dimensions have been considered against the general requirement for single-person accommodation. The rooms measuring approximately 8.50 square metres are particularly sensitive to the final method of area calculation, and nominal dimensions must be distinguished from verified usable bedroom floorspace.

3.10 The applicant does not seek to include en-suite sanitary accommodation within the usable sleeping area where the applicable standard excludes it, nor to rely upon floor areas that cannot reasonably be used because of restricted height or other physical constraints.

3.11 The design assessment therefore proceeds on the basis that the applicable bedroom-size requirements must be satisfied by the actual sleeping accommodation, rather than by the combined area of bedrooms and associated facilities.

3.12 The provision of communal rooms separate from the bedrooms further supports the proposed residential arrangement by allowing residents to undertake shared activities outside their private sleeping accommodation.

3.13 The applicant is prepared to accept a planning condition limiting each bedroom to single occupancy and the property to six residents overall.

3.14 The applicant respectfully submits that the proposed arrangement provides a clear and controlled six-bedroom scheme, with private and communal accommodation identified separately and the intended occupation limited to a specified maximum.

4.0 ACCESS, PARKING, REFUSE STORAGE, FIRE SAFETY AND OPERATIONAL MANAGEMENT

4.1 The applicant has incorporated access and operational considerations into the design of the revised six-bedroom residential accommodation.

4.2 The proposed development retains the existing building and its established means of external access, without introducing an additional independent residential building.

4.3 The internal layout provides shared circulation serving the six bedrooms and the designated communal accommodation.

4.4 The principal communal room is located at ground-floor level, with the supplementary communal living room provided at first-floor level.

4.5 This arrangement establishes communal accommodation across the residential floors while retaining a defined internal organisation between sleeping, sanitary and shared domestic functions.

4.6 The applicant has also considered the importance of maintaining clear circulation and access arrangements within the building, particularly in relation to shared facilities and emergency escape.

4.7 The design retains a maximum occupancy of six residents, providing a defined basis for the consideration of movements to and from the property and the potential implications for surrounding residential amenity.

4.8 The property is not proposed to be subdivided into six self-contained flats. It remains a single shared residential arrangement with individual bedrooms and communal facilities.

4.9 The applicant recognises that the parking implications of an HMO must be assessed against the actual highway circumstances, the existing parking arrangements and the relevant requirements of the development plan.

4.10 The proposed six-person occupancy provides a clear parameter for assessing potential residential parking demand. The existing site arrangement remains the physical basis for that assessment, rather than any additional parking development proposed as part of the scheme.

4.11 In relation to refuse storage, the proposal involves ordinary domestic waste generation associated with a six-person shared household. The applicant recognises the need for suitable storage and collection arrangements proportionate to that level of occupation.

4.12 The management of refuse and recycling is intended to form part of the ongoing operation of the accommodation, ensuring that residents have access to appropriate waste facilities and that containers are presented and returned in accordance with Council collection arrangements.

4.13 Fire safety has been identified as an important requirement associated with the proposed shared residential arrangement. The final accommodation must provide appropriate fire detection, warning arrangements, fire separation and means of escape in accordance with the applicable statutory requirements.

4.14 The applicant recognises that planning considerations, HMO licensing obligations and Building Regulations requirements operate under separate statutory frameworks. The proposed planning layout must therefore be implemented and managed in a manner compatible with each applicable regime.

4.15 The applicant's proposed maximum six-person occupation, identified communal spaces and retention of the existing residential building provide a defined framework for the operational management of the property.

4.16 Where reasonable and necessary, the applicant is willing to accept appropriately worded conditions securing the maximum occupancy and continued communal use of the designated living accommodation.

4.17 The applicant respectfully submits that the revised design presents a clearly identified residential arrangement which can be assessed against the Council's planning requirements, rather than an undefined or potentially expanding form of shared occupation.

4.18 The Council is invited to consider the design measures described in this Statement together with the submitted architectural drawings, the accompanying Planning Statement and the Design and Access Statement when determining the application.

Regards,

Ayaz Uddin

Director & Lead Planning Consultant

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Architectural Practice Credentials
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