PLANNING STATEMENT

2 MILDMAY ROAD
ROMFORD
ESSEX
RM11 1EP

Date of Statement: NOV 2026
Job Ref: 6466/DB

INTRODUCTION

This Planning Supporting Statement is submitted in support of a full planning application for the erection of a single-storey outbuilding to the rear of 2 Mildmay Road, Romford. The outbuilding is proposed as an ancillary facility in connection with the existing House in Multiple Occupation (HMO) at the application site, which currently operates within Use Class C4.

The property has been in continuous use as an HMO for in excess of 12 years, establishing a long-standing lawful residential use in that class. The HMO was originally let and managed under a lease agreement with the London Borough of Havering. That arrangement concluded in 2023, since which time the property has been let privately by the applicant. A HMO licence under Part 2 of the Housing Act 2004 was obtained in 2023 and the property continues to be managed in full compliance with its licensing obligations.

The statement sets out the planning context, describes the proposal in full, and assesses the application against the relevant provisions of the National Planning Policy Framework (NPPF, 2024), the London Plan (2021), and the policies of the Havering Local Plan (2016–2031). It demonstrates that the proposal is acceptable in planning terms and that permission should be granted.

SITE & SURROUNDING AREA

The application site comprises a two-storey end of terraced dwellinghouse located on the north side of Mildmay Road, Romford. The property currently operates as a five-bedroom House in Multiple Occupation within Use Class C4, accommodating up to five persons. The house contains five letting bedrooms, one shared kitchen and shared bathroom facilities.

The surrounding area is predominantly residential in character, consisting largely of semi-detached, terraced dwellings of similar scale and form and larger blocks of flats. Mildmay Road is a one-way street with restricted on-street parking. The site is accessible to a range of local services, public transport connections at Mawney Road, and Romford Railway Station, which is within walking distance.

The rear garden is of reasonable depth. It is not within a Conservation Area and the property is not listed. The rear garden is not subject to any Tree Preservation Orders. A number of properties in the wider area incorporate residential outbuildings to the rear, which form part of the prevailing character of the area.

Description of proposal

The proposal is for the erection of a single-storey outbuilding to the rear of the application site. The outbuilding will have a Gross External Area (GEA) of 54m² and will be positioned approximately 15 metres from the rear elevation of the main dwelling, with the intervening space forming a private amenity garden available to all tenants of the HMO.

The building has been a HMO for in excess of 12 years, license was obtained in 2023

The outbuilding is designed to provide ancillary communal facilities and a single additional sleeping room in connection with the existing C4 HMO. The accommodation schedule is set out below.

Space	Description / Users	GIA (m²)
PERSONAL SLEEPING ACCOMMODATION		
Bedroom	Sleeping accommodation — one tenant	7.5
En-suite	Private bathroom — one tenant	4.0
Lobby / hallway	Entrance lobby — one tenant	2.0
COMMUNAL AND OPERATIONAL FACILITIES		
Laundry room	Washing machine and tumble dryer — all tenants	7.0
Maintenance / plant room	Landlord operational use only — no tenant access	7.0
Storage room 1	Tenant storage — Independent door	2.75
Storage room 2	Tenant storage — Independent door	2.75
Storage room 3	Tenant storage — Independent door	2.75
STRUCTURE		
Walls / structure	—	~18.25
TOTAL GEA		**54.0**

The personal sleeping accommodation (bedroom, en-suite and lobby) accounts for 13.5m² GIA — **25% of the total GEA**. The remaining 75% of the building comprises communal and operational facilities serving the HMO as a whole: a shared laundry room available to all tenants, three individually lockable storage rooms available to the tenants, and a dedicated maintenance and plant room reserved exclusively for landlord operational use.

The outbuilding has no kitchen. The bedroom occupant will share the existing kitchen within the main house at No.2, accessed via the rear door of the dwelling. There is no independent external access to the outbuilding from the public highway; the outbuilding is reached exclusively through the rear garden, with entry to the main house via the back door.

The outbuilding will be of single-storey construction with a hipped pitched roof finished in timber cladding with concrete roof tiles, responding to the garden setting and providing an attractive, contemporary finish appropriate to its rear garden location.

PLANNING HISTORY

There is no planning history directly relevant to this application at 2 Mildmay Road. The existing use of the property as a five-bedroom HMO within Use Class C4 is noted.

The Council has adopted an Article 4 Direction removing permitted development rights for the change of use from C3 dwellinghouse to C4 HMO across parts of the Borough. The application is therefore made as a full planning application. No lawful development certificate is sought; the application proceeds on the basis that the outbuilding is ancillary to the lawful C4 use.

PRINCIPLE OF DEVELOPMENT

Ancillary outbuilding, not a new dwelling

The fundamental planning question raised by this proposal is whether the outbuilding would constitute a separate planning unit — a new dwelling — or whether it remains genuinely ancillary to the host HMO. This statement submits that the proposal is unequivocally in the latter category and sets out the reasons below.

The test for self-containment in the context of HMO accommodation has been considered in a number of Planning Inspectorate decisions. The question is not simply whether a structure could theoretically be used independently, but whether the physical arrangement is such that independent occupation would be the realistic outcome. Where the design prevents independent occupation — by removing the kitchen, by restricting access through the host property, and by imposing appropriate planning conditions — the outbuilding does not constitute a new planning unit.

No self-containment

The proposed outbuilding is not self-contained. It contains no kitchen or cooking facilities of any kind. The bedroom occupant will share the kitchen within the main house at No.2, as do all five existing tenants. This is not a novel arrangement requiring tenants to go outdoors to access basic facilities to which they would otherwise have a reasonable expectation. It is simply the existing HMO arrangement — shared kitchen, shared bathroom — extended by one bedroom and one additional person.

The provision of an en-suite within the outbuilding does not, of itself, create self-contained accommodation. Courts and Inspectors have consistently held that an en-suite bathroom does not equate to self-containment; self-containment requires the full range of domestic facilities including cooking. The outbuilding provides none of the cooking facilities that would be required for independent occupation.

Access and functional dependency

All occupants of the HMO — including the bedroom occupant of the proposed outbuilding — access the property through the single front door of 2 Mildmay Road. There is no separate or independent access to the outbuilding from the public highway. The outbuilding can only be reached by passing through the main house. This physical arrangement is a strong indicator of functional dependency; it is structurally impossible for the outbuilding to be occupied as an independent dwelling without material alteration to the access arrangements.

The outbuilding is positioned approximately 15 metres from the rear elevation of the main house, with the intervening space forming a private amenity garden for the use of all tenants. The walking distance to shared facilities in the main house is comparable to the internal circulation distance in a large HMO property. The bedroom occupant's relationship to the shared kitchen is functionally identical to that of a tenant at the far end of a large conventional HMO — they share the kitchen as a matter of routine, in the same manner as all other tenants.

Dominant use: communal facilities

The sleeping accommodation — bedroom, en-suite and entrance lobby — accounts for only 13.5m² GIA, representing 25% of the total GEA of 54m². The remaining 75% of the building comprises facilities serving the HMO as a whole: a shared laundry room (7.0m²) equipped with

washing machine and tumble dryer for use by all tenants; a maintenance and plant room (7.0m²) for landlord operational use; and three individually lockable storage rooms (each 2.75m²) available to use by any tenant in the HMO. The maintenance and plant room is reserved exclusively for the landlord and is inaccessible to tenants — a feature wholly inconsistent with the building being treated as or converted to an independent dwelling.

The dominant use of the outbuilding, measured by floorspace, is communal and operational rather than personal residential. The building functions primarily as a managed HMO amenity block, with a single bedroom as a subsidiary element. The presence of a dedicated landlord maintenance and plant room is wholly inconsistent with the outbuilding forming an independent dwelling; it reflects the managed nature of the HMO of which the outbuilding forms a part.

C4 use class — six persons

Use Class C4 permits occupation as an HMO by between three and six persons. The existing five-bedroom main house accommodates up to five persons. The proposed outbuilding would add one further bedroom, bringing the total to six persons — the maximum number within C4. The proposal therefore remains within the C4 use class and does not give rise to a sui generis HMO of seven or more persons. No intensification beyond C4 is proposed or sought.

The addition of a sixth bedroom to a C4 HMO does not in principle require different planning treatment from the addition of a bedroom within the main house. The fact that the bedroom is in a physically separate structure does not change its functional role within the HMO; it is one of six bedrooms served by the same shared kitchen and the same front door.

POLICY ASSESSMENT

National Planning Policy Framework (2024)

The NPPF (2024) sets out the Government's planning policies for England. Paragraph 11 establishes the presumption in favour of sustainable development. Where a development plan is absent, silent or out-of-date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. This Statement submits that the proposal is consistent with the development plan and that the tilted balance therefore does not fall to be applied; however, even if it did, the benefits of the proposal — additional HMO accommodation in a borough with an identified housing need — would significantly outweigh any harm.

Paragraph 73 of the NPPF supports the development of small and medium sites, noting their importance in delivering housing. The London Borough of Havering recorded a Housing Delivery Test score of 61% in 2023 against a Government benchmark of 95%, and the Council is unable to demonstrate a five-year housing land supply. In these circumstances, the tilted balance under paragraph 11(d) is engaged, and the presumption in favour of sustainable development applies with particular force.

The NPPF is also clear at paragraph 124 that planning decisions should promote the effective use of land, making as much use as possible of previously-developed land, and that development which makes efficient and productive use of land should be supported. The proposal makes efficient use of an existing rear garden by providing communal HMO facilities and additional accommodation — representing an effective use of urban land consistent with national policy.

London Plan (2021)

Policy H1

Increasing housing supply. The proposal contributes one additional HMO bedroom toward the Borough's housing need. Havering's housing delivery trajectory falls short of its Strategic Housing Need; small-scale HMO additions contribute to this supply.

Policy H2

Small sites. Supports the delivery of additional homes on small sites as a component of overall housing supply. The proposal is consistent with this policy.

Policy D3

Optimising site capacity. Requires development to make the most of existing sites. The outbuilding makes productive use of rear garden land to provide both additional accommodation and communal HMO facilities.

Policy D4

Delivering good design. The outbuilding will be of appropriate scale, mass and finish, designed to complement the host dwelling. It will not cause harm to the character and appearance of the surrounding area.

Policy D6

Housing quality and standards. The bedroom within the outbuilding meets the minimum space standards for a single-person bedroom. Shared facilities — kitchen, bathroom — are provided within the main house to the same standard available to all other tenants.

Havering Local Plan (2016-2031)

Policy 3

Housing supply. The Local Plan requires the Council to maximise housing delivery, including through intensification and effective use of existing residential sites. The proposal contributes to this objective.

Policy 7

Residential design and amenity. The outbuilding is of appropriate scale and will be designed to complement the host dwelling. It will not cause undue harm to the amenity of neighbouring occupiers in terms of overlooking, overshadowing, or loss of privacy. The amenity of the HMO occupants themselves is safeguarded by shared garden space, laundry facilities, and storage provision.

Policy 8

Policy 8 of the Havering Local Plan 2016–2031 sets out the criteria against which proposals affecting HMO use are assessed. The policy seeks to ensure that HMOs are of an appropriate standard, that they do not give rise to unacceptable concentrations of such uses within residential areas, and that they do not have an unacceptable impact on the character and amenity of the surrounding area.

The proposal does not create a new HMO. It extends an existing, lawfully established C4 HMO from five to six persons — the maximum permissible within the use class. The property has operated as an HMO for in excess of twelve years and holds a current HMO licence. The proposal adds one bedroom and one en-suite together with dedicated communal facilities — laundry, storage and maintenance provision — that materially improve the standard and management of the HMO as a whole. It is not considered that the addition of a single occupant will give rise to any material change in character or any unacceptable concentration of HMO use in the locality. The proposal is consistent with Policy 8.

Policy 10

Policy 10 of the Havering Local Plan 2016–2031 applies to development within rear gardens and backland plots. The policy requires that such development does not unacceptably harm the amenity of neighbouring occupiers, does not erode the open character and rhythm of rear garden spaces as experienced from the street or from adjoining properties, and does not give rise to harmful overlooking, overshadowing or loss of privacy.

The proposed outbuilding satisfies each of these criteria. It is of single-storey construction with a hipped pitched roof, and its eaves and ridge heights are modest and subordinate to the host dwelling. No windows or openings are proposed in the flank elevations, eliminating any risk of overlooking of neighbouring gardens. The outbuilding is set well within the rear garden and will not be visible from the public highway. Its footprint preserves the majority of the rear garden as usable amenity space, and the soft landscaping proposed to its southern elevation reinforces

the green character of the garden setting. The proposal does not give rise to unacceptable harm to the open character of the rear garden as viewed from adjoining properties, and is consistent with Policy 10.

Policy 24

Parking provision and design. The proposal does not reduce the existing parking provision at the site. The addition of one further HMO tenant does not, in this location with good public transport accessibility, require additional off-street parking.

Policy 26

Urban design. The outbuilding will be of single-storey construction with a pitched roof, designed and finished to complement the host dwelling in terms of scale, massing, and materials. It will not appear incongruous in the rear garden environment.

Policy 27

Residential extensions and alterations. The Council's Residential Extensions and Alterations SPD (2011) provides guidance on outbuildings. The proposed outbuilding responds to this guidance in terms of its scale, height, and relationship to the host dwelling and boundaries.

CHARACTER & DESIGN

The character of Mildmay Road is derived from its predominantly two-storey semi-detached and terraced dwellings. The rear gardens of these properties are long and narrow. A number of properties in the area feature outbuildings to the rear, which form part of the established character of the rear garden environment.

The proposed outbuilding is of single-storey construction, with a modest hipped pitched roof. Its scale and massing are appropriate to its rear garden setting and subordinate to the host dwelling. It will not be visible from the public highway. The impact on the street scene is therefore negligible. The impact on the rear garden scene is consistent with the established pattern of outbuildings in the area and will not appear incongruous or harmful to the character of the locality.

The outbuilding will be finished in timber cladding throughout, with a tiled hipped pitched roof. This finish is appropriate to the rear garden setting. No windows or openings are proposed in the flank walls, ensuring that the development does not give rise to overlooking of neighbouring gardens.

Soft landscaping is proposed to the front of the outbuilding, between the bedroom window and the shared walkway serving the laundry room and storage rooms. This planting provides a degree of visual screening and privacy to the bedroom occupant, creates a pleasant outlook from the bedroom window, and reinforces the considered design and management of the external amenity space. It reflects the fact that the outbuilding has been planned as an integral part of a managed HMO environment rather than as a standalone structure.

RESIDENTIAL AMENITY

Neighbouring occupiers

The outbuilding is of single-storey construction and is sited within the rear garden of the application site. Its modest eaves and ridge heights ensure that it does not project above boundary fencing to any material degree. It will not cause unacceptable overshadowing, loss of daylight, or loss of privacy to the occupiers of neighbouring properties. No flank windows are proposed, eliminating any risk of direct overlooking of adjacent gardens.

The activity associated with the outbuilding — laundry use, storage access, and the comings and goings of a single additional tenant — is a normal domestic level of activity consistent with its residential setting. It will not give rise to any undue noise or disturbance to neighbouring occupiers beyond that already associated with the existing HMO.

Occupants of the outbuilding and the HMO

The bedroom within the outbuilding has a floor area of 7.5m^2 exclusive of en-suite and entrance lobby, meeting the minimum space standard for a single occupant. The provision of a dedicated en-suite ensures that the bedroom occupant has private bathroom facilities without the need to return to the main house for sanitary purposes.

The amenity provision for all HMO tenants is enhanced by the proposal: the shared laundry room eliminates the need for tenants to manage laundry within individual bedrooms; the storage rooms allow tenants to store bicycles, luggage, and other items securely; and the private amenity garden provides shared outdoor space for the enjoyment of all six tenants.

Soft landscaping is proposed to the front of the outbuilding, positioned between the bedroom window and the shared walkway providing access to the laundry room and storage rooms. This planting screens the bedroom occupant from passing activity along the walkway, provides an agreeable outlook from the bedroom window, and contributes to the overall quality of the rear amenity space. The arrangement is consistent with the standard of accommodation expected of a well-managed HMO.

Quality of accommodation — functional dependency

The bedroom occupant will access the shared kitchen within the main house via the rear door, crossing approximately 15 metres of private amenity garden. This Statement acknowledges that this route is external and addresses the practical considerations it raises.

Lighting

The route crosses a private enclosed rear garden. External lighting will be provided along the garden path as a matter of course, consistent with standard HMO management practice. A condition requiring the submission and approval of a lighting scheme prior to occupation of the outbuilding can be accepted by the applicant and would provide the Local Planning Authority with direct control over this matter.

Weather protection

The outbuilding entrance lobby provides a covered threshold at the outbuilding end of the route. The rear door of the main house similarly provides a covered threshold at the kitchen end. The 15-metre path between them is open to the elements; however, this is a commonplace feature

of HMO and shared residential living — tenants in ground-floor garden flats, purpose-built houses in multiple occupation, and properties with outbuilding annexes routinely cross short external distances to access shared or communal facilities. The distance involved is modest and does not represent an unreasonable burden on the bedroom occupant.

Security

The rear garden is enclosed and accessible only through the main house or its rear garden gate, which can be secured. The outbuilding entrance door will be fitted with a standard residential lock. The bedroom occupant's route to and from the kitchen does not involve passing through any publicly accessible space. The arrangement is no less secure than that of a ground-floor tenant in a large HMO accessing a basement kitchen.

Living conditions

The Planning Inspectorate has considered comparable arrangements in a number of appeal decisions. Where outbuildings have been found unacceptable on grounds of living conditions, the operative concern has consistently centred on the absence of cooking facilities — not on walking distance per se. The requirement to venture outdoors to access a kitchen was found objectionable in those cases because it imposed an unreasonable burden in relation to a basic domestic necessity. That concern does not arise here. The bedroom occupant is a tenant in an HMO; shared kitchen use is the defining characteristic of that form of accommodation. The 15-metre walk is simply the route from one part of the HMO to another — functionally identical to an internal corridor in a larger property. It does not constitute an unacceptable living condition.

The proposal is therefore considered to provide accommodation of an acceptable standard for future occupants, consistent with London Plan Policy D6, Havering Local Plan Policies 7 and 8, and the HMO licensing requirements of the Housing Act 2004.

Bedroom standard — space, light, ventilation and licensing compliance

The bedroom within the outbuilding has a net floor area of 7.5m², exclusive of en-suite and entrance lobby. This meets the minimum room size for a single occupant under the HMO licensing regime: the Licensing of Houses in Multiple Occupation (Mandatory Conditions) Regulations 2018 prescribe a minimum floor area of 6.51m² for a room occupied by one person aged 10 or over. The proposed bedroom exceeds this statutory minimum by approximately 15%.

The bedroom is served by a window to the southern elevation, providing direct natural light and natural ventilation in accordance with Building Regulations Approved Document F. The window orientation to the south ensures good levels of daylight throughout the day. No habitable windows are proposed on the flank elevations, which maintains privacy between the outbuilding and neighbouring properties whilst the principal window provides adequate light and outlook over the landscaped garden area.

The entrance lobby (2.0m²) provides a transitional space between the external environment and the sleeping accommodation, contributing to thermal comfort, acoustic separation and security for the bedroom occupant. Together, the bedroom, en-suite and lobby provide a self-contained private suite of 13.5m² GIA — a standard of personal accommodation consistent with well-managed HMO provision and materially above the minimum licensing threshold.

SUGGESTED PLANNING CONDITIONS

In order to address any residual concern regarding the future use and occupation of the outbuilding, the applicant is willing to accept the following planning conditions and offers them proactively as part of this application:

> ***Ancillary occupation condition (Grampian-style):*** *The outbuilding hereby approved shall not be occupied other than by persons residing as members of the household occupying 2 Mildmay Road as a House in Multiple Occupation within Use Class C4. The outbuilding shall not be used or occupied as a separate unit of residential accommodation independently of the said main dwelling. No kitchen or cooking facilities shall be installed in the outbuilding without the prior written consent of the Local Planning Authority.*
>
> ***Reason:*** *To ensure that the outbuilding remains genuinely ancillary to the host HMO and does not give rise to a separate planning unit, and to maintain the functional dependency between the outbuilding and the main dwelling, in accordance with Policies 7 and 26 of the Havering Local Plan 2016–2031.*

The applicant also accepts a standard no-flank-windows condition and a materials-to-match condition as appropriate.

These conditions provide the Local Planning Authority with robust safeguards. They are precise, enforceable, and directly responsive to the planning concern they address. They confirm on the face of the planning permission that the outbuilding is an ancillary facility and not an independent dwelling unit, eliminating any ambiguity as to its planning status.

COMMUNITY INFRASTRUCTURE LEVY

The proposal creates 54m² of gross new internal floorspace. This does not exceed the 100m² threshold below which Mayoral CIL liability does not arise, and the development does not constitute a new dwelling. The proposal is therefore not CIL liable. No CIL Additional Information Form is required.

In the event that the Council determines the outbuilding to constitute a new dwelling contrary to the submissions in this statement, the applicant notes that the ancillary classification — which is the correct classification — is explicitly confirmed by the Grampian condition offered at Section 9 above, and that classification determines CIL liability.

HOUSING DELIVERY CONTEXT

The London Borough of Havering recorded a Housing Delivery Test score of 61% in its most recent assessment, below the Government's 95% threshold. The Council is unable to demonstrate a five-year housing land supply. In these circumstances, the presumption in favour of sustainable development under NPPF paragraph 11(d) is engaged, and the tilted balance applies.

HMO accommodation makes an important contribution to the Borough's housing supply, providing flexible, affordable accommodation for single persons and small households who cannot access or do not require self-contained units. The addition of a sixth bedroom to an established C4 HMO, served by a managed amenity block providing shared laundry, storage and maintenance facilities, is a modest but material contribution to the Borough's stock of affordable private rented accommodation.

The housing benefits of the proposal are real and tangible. They are not outweighed by any identified harm to character, amenity, highway safety or any other material consideration. Permission should be granted.

CONCLUSION

This statement has demonstrated that the proposed outbuilding at 2 Mildmay Road, Romford is genuinely ancillary to the existing C4 HMO and does not constitute a new or independent planning unit. The outbuilding contains no kitchen, is accessible only through the main house front door, and comprises predominantly communal and operational facilities (75% of GEA) rather than personal sleeping accommodation (25% of GEA).

The proposal is consistent with the NPPF (2024), the London Plan (2021) and the policies of the Havering Local Plan (2016–2031). It will not cause harm to the character and appearance of the area, to the amenity of neighbouring occupiers, or to highway safety. The standard of accommodation provided is appropriate and consistent with the existing HMO arrangement, with all shared facilities maintained within the main house.

The applicant proactively offers a Grampian-style condition restricting the outbuilding to ancillary HMO use and prohibiting the installation of cooking facilities, providing the Local Planning Authority with a robust and enforceable safeguard.

In the context of Havering's identified housing delivery shortfall and the engagement of the tilted balance under NPPF paragraph 11(d), the housing benefits of the proposal significantly outweigh any identified harm. It is respectfully submitted that planning permission should be granted.