

LONDON BOROUGH OF HAVERING

**HOUSES IN MULTIPLE OCCUPATION
ARTICLE 4 DIRECTION
EVIDENCE**

JULY 2026

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1 Purpose of the Report

1.1 The Council is concerned by the nature of HMOs being formed in the Borough and their associated impacts on residents

1.2 The purpose of this report is to set out the evidence in support of an Article 4 Direction to implement the removal of permitted development rights for the conversion of dwelling houses into Houses of Multiple Occupation (HMOs). In particular, it addresses the increasing issues of the conversion of detached houses to HMOs without planning permission.

2 Legislative and Policy Context

National

2.1 The National Planning Policy Framework 2024 does not set out specific guidance on HMOs. However, Paragraph 63 states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

Planning Use Classes and General Permitted Development Order

Small HMOs

2.3 Use Class C4 refers to a small HMO which has between 3 and 6 people, forming more than one household.

2.4 Dwelling houses (within Use Class C3) can be converted to a small HMO under permitted development rights and therefore do not require planning permission from the Council.

Large HMOs

2.5 A large HMO has 7 or more people living together, forming more than one household and is classed as Sui Generis.

Planning permission is required from the Council when changing a dwelling house (Use Class C3) to a large HMO.

3 Article 4 Directions

3.1 The Government has given Councils the power to remove certain 'permitted development rights' in all or part of their area through Article 4 of the General Permitted Development Order 2015 (as amended) if they consider it is appropriate to do so and there is sufficient planning justification.

3.2 Paragraph 54 of the NPPF states that the use of Article 4 directions to remove national permitted development rights should be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area, be based on robust evidence and apply to the smallest geographical area possible.

3.3 In England, licensing with the Council is mandatory for all HMOs with five or more people to address safety and management standards. Since 18 March 2026, it is now a legal requirement to licence smaller HMOs (occupied by three or four persons) in Havering. Prior to this, it meant that the smaller HMOs in certain wards were unlicensed. Unfortunately, there are still a few HMOs which have not undergone licencing.

3.4 A report produced by the then Department for Communities and Local Government (DCLG), now the Department for Levelling Up, Housing and Communities (DLUHC), was directly prepared in response to the problems associated with high concentrations of HMO. Despite the report noting that positive regeneration impacts can result from this spatial distribution, such as introducing a new population and life into an area, it notes that the following negative impacts can also be experienced:

- Poor refuse management;
- Anti-social behaviour (ASB), noise and nuisance;
- Imbalanced and unsustainable communities;
- Negative impacts on the physical environment and streetscape; and
- Pressures upon parking provision.

London Plan

3.5 The London Plan (2021) acknowledges the role of HMOs in meeting the housing needs of London's residents. HMOs are an important source of low-cost housing within the private rented sector, particularly for those on low incomes, students, young people and vulnerable groups who cannot access other types of market or affordable housing. HMOs are also an important source of flexible housing for those seeking temporary accommodation.

3.6 Policy H9 (Ensuring the best use of stock) states that Boroughs should take account of the role of HMOs in meeting local and strategic housing needs. Where they are of a reasonable standard they should generally be protected.

3.7 The supporting text of Policy H9 clearly acknowledges the important role HMOs play in London's Housing market by stating: 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 (Paragraph 4.9.4).

3.8 Achieving high standards of residential quality and design internally and externally are matters that the 2021 London Plan seeks to deliver through Policy D6 Housing quality and standards, in that housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

Havering Local Plan

3.9 The Havering Local Plan recognises that HMOs can make a valuable contribution to the private rented sector by catering for the housing needs of specific groups. Policy 8 (Houses in Multiple Occupation) states that this needs to be balanced with the potential harm that can arise from such development if they are not subject to control. Policy 8 is supportive of HMOs where it can be demonstrated that:

- i. The overall size of the original property to be converted is not less than 120 sq m;
- ii. The proposal does not result in more than 10% of properties in one street becoming HMOs (including existing lawful HMOs) or more than two adjacent properties becoming HMOs, thereby undermining the principle of mixed communities;
- iii. The proposal does not have an adverse impact on the surrounding area and will not be likely to give rise to significantly greater levels of noise and disturbance to occupiers of nearby residential properties than would a single family dwelling of equivalent size;
- iv. The proposal meets Havering's parking requirements and it will not have an unacceptable impact on parking conditions and traffic congestion in the area;
- v. Adequate, secure and well screened refuse storage is provided within the curtilage of the site and is accessible by all residents;
- vi. The property contains communal space, including either a dining or living area, large enough for all the dwelling's occupants to use simultaneously; and

vii. The proposal meets the requirements of the East London HMO guidance.

3.10 The conversion of family sized housing to a HMO means the loss of larger housing available to families which is an important, identified need within Havering. This is addressed in Policy 5 (Housing Mix) which states that the Council will support development proposals that provide a mix of dwelling types, sizes and tenures.

3.11 All housing schemes should include a proportion of family sized homes and reflect the recommended housing mix identified in Table 4 (copied below) unless it can be robustly demonstrated that a variation to the mix in Table 4 (copied below) is justified having regard to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities.

3.12 Where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard the mix of units to be provided within developments and the housing mix as set out in Table 4 (Copied Below) does not apply to such proposals.

Table 1: From Havering Local Plan. Table 4 Borough Wide Housing Mix

	1 bed	2 bed	3 bed	4 bed
Market Housing	5%	15%	64%	16%
Affordable Housing	10%	40%	40%	10%

4 HMO Licencing in Havering

4.1 Planning and Licencing for HMOS are two separate requirements under different regulatory frameworks. Planning seeks to control how a property is used and the number of individuals permitted whereas licencing focuses on the health, safety and management standards of HMOs. There are also some differences in the categorisation of HMOs.

4.2 There are three licencing schemes in the borough:

1. Selective Licensing: Applies to all privately rented properties within seven wards (Beam Park, Harold Wood, Rainham and Wennington, Rush Green and Crowlands, Squirrels Heath, St Albans, and St Edwards). This came into effect in March 2026. Selective Licencing is not specific to HMOs.
2. Additional Licencing: Applies to HMOs of 3 or 4 persons of two or more households. This applies to the whole borough and came into effect in March 2026.

3. Mandatory Licencing: Since October 2018 a mandatory licence is required across England for any property occupied by 5 or more people of 2 or more households with shared facilities. This applies across England.

4.3 The result of the additional and mandatory licencing schemes is that all HMOs in the borough now require some form of a licence from the Council.

5 Current Article 4 Directions in Havering

5.1 Two Article 4 Directions relating to HMOs came into effect in Havering in 2016. The two Directions addressed the issues identified in particular areas of the borough where the higher concentration of HMOs were found and the level of complaints were an issue.

5.2 The first direction (Art4/1/2015) covers 4 wards in the borough and removes permitted development rights that permit a change of use from any dwellinghouse (C3 use) into a small HMO (C4).

5.3 The second direction (Art4/2/2015) covers all of the remaining wards in the borough and removes permitted development rights that permit a change of use from a dwellinghouse (C3 use) which is a flat, terraced or semi-detached house to a small HMO (C4).

5.4 Article 4 Direction 1 covers Brooklands, Romford Town, Heaton and Gooshays wards. The Directions were based on the 2015 ward boundaries which were updated in 2022.

5.5 As a result of the ward changes this direction is now approximately covered by Gooshays, St Edward's, St Alban's, Heaton and Rush Green & Crowlands wards.

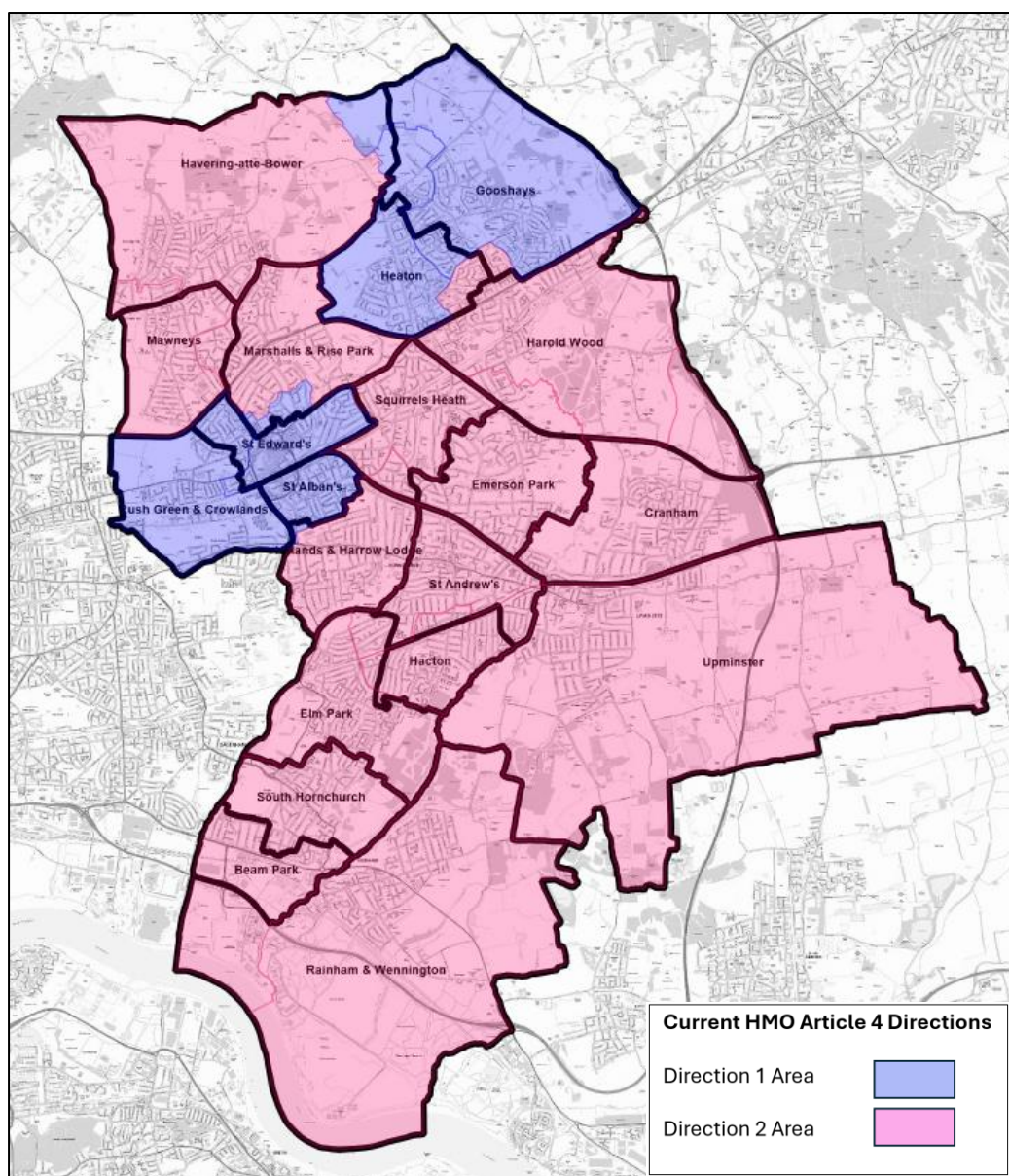
5.6 The combined effect of the Article 4 Directions is that currently in Havering permitted development rights exist to change a detached property to a small HMO of 3-6 people (Use Class C4) in certain wards. All other HMOs require planning permission.

5.7 To address the ward boundary change an explanatory note was published confirming that the HMO Article 4, Directions 1 and 2 boundaries had not changed. The note identifies the detached properties in areas where wards have changed and clarified the controls that apply.

5.8 The areas covered by the existing Article 4 Directions are shown in Figure 1.

5.9 It should be noted that whilst this report considers evidence from both the licencing and the planning systems, an Article 4 Direction relates only to the planning process.

Figure 1 – Havering Current Article 4 Direction Areas.



5.10 Many London Boroughs have implemented or initiated Article 4 Directions to remove permitted development rights for change of use from a dwelling housing (Use Class C3) to a HMO (Use Class C4).

5.11 Of the 32 other London Boroughs (excluding Havering) 19 Boroughs¹ have implemented or initiated Article 4 Directions that cover the whole borough and a further

¹ Barking & Dagenham, Barnet, Bexley, Bromley, Croydon, Ealing, Enfield, Greenwich, Hammersmith and Fulham, Harrow, Hillingdon, Hounslow, Lewisham, Merton, Newham, Redbridge, Sutton, Tower hamlets and Waltham forest

4² councils have an Article 4 Direction that covers part of their Borough. All boroughs in the east of London have Directions in place.

5.12 There are only 9³ London Boroughs that do not have an Article 4 direction in place relating to HMOs. These are predominantly inner London boroughs or boroughs in the south west, which are unlike Havering in context.

5.13 The extent of Article 4 coverage clearly demonstrates that the unregulated growth of small HMOs is an issue across London and not just in Havering.

5.14 Table 1 below gives further detail of the Directions in place in neighbouring boroughs.

5.15 The Article 4 Directions in place in London do not distinguish between types of property as is currently the case in Havering. No boroughs have Article 4 Directions that only remove permitted development rights in terraced or semi-detached properties.

Table 2: HMO Article 4 Directions in Other Boroughs

Borough	Detail	Geographical Coverage
Neighbouring Boroughs		
Redbridge	Removes permitted development rights for change of use from C3 (dwelling house) to C4 (HMO)	Whole borough
Barking & Dagenham	Removes permitted development rights for change of use from C3 (dwelling house) to C4 (HMO)	Whole borough
Bexley	Removes permitted development rights for change of use from C3 (dwelling house) to C4 (HMO)	Whole Borough
Brentwood Borough Council	No Article 4 Direction in Place	N/A
Epping Borough Council	No Article 4 Direction in Place	N/A
Basildon Borough Council	Currently considering the implementation of an Article 4 Direction Removes permitted development rights for change of use from C3 (dwelling house) to C4 (HMO)	Whole Borough

² **Brent, Haringey, Lambeth and Southwark**

³ **Camden, City of London, Hackney, Islington, Kensington and Chelsea, Kingston, Richmond, Wandsworth and Westminster**

5.16 Boroughs in Essex, immediately outside London, were also reviewed as a comparison. The three adjoining boroughs do not have HMO Article 4 Directions in place. It is considered that the housing stock the three Essex boroughs are not directly comparable to Havering in age or typology.

5.17 Basildon Council is introducing a whole borough Article 4 HMO Direction with immediate effect. Basildon housing is more directly comparable with that in Havering in age and typology.

Property type

Table 3: No. Detached houses and No. Semidetached houses in each ward.

Ward Name	No. detached houses R2	No. Semi-detached houses R3
Beam Park	134	436
Cranham	848	2447
Elm Park	154	2435
Emerson Park	1782	1095
Gooshays*	240	1357
Hacton	214	2520
Harold Wood	360	2203
Havering-atte-Bower	502	2435
Heaton*	204	1264
Hylands & Harrow Lodge**	666	1734
Marshalls & Rise Park**	914	2638
Mawneys	411	1943
Rainham & Wennington	939	1736
Rush Green & Crowlands*	187	1340
South Hornchurch	519	780
Squirrel Heath	960	2149
St Albans*	140	849
St Andrew's	408	3071
St Edward's*	193	904
Upminster	799	3566
Borough total	10,574	36,902

*Ward is largely covered by existing Article 4 relating to detached properties

** part of the ward is covered by existing Article 4 relating to detached properties

Data from Ordnance Survey Mapping (2026 – Codes RD02 and RD03).

5.18 Of the 10,574 detached houses, 9,610 are located in the Article 4 Direction 2 area and therefore would not require planning permission to convert to a small HMO (C4 use).

5.19 This demonstrates that there are a significant number of detached houses across the borough that could be at risk from redevelopment to an HMO without requiring planning permission.

5.20 The quality of the new HMOs would therefore be considered with respect to bedroom and living area size, outdoor amenity space, noise impacts and impact on parking and the local highway. These matters are considered under the HMO licensing regime.

6 Quantity and Spatial Distribution of HMOs

6.1 There are 314 licensed HMOs in Havering (June 2026) of which 255 are for 5 or more occupants. There are 33 licenced HMOs for 4 or less occupants.

- Mandatory HMOs - 281
- Additional HMOs - 33

6.2 Private rented accommodation rented to a single household or 1-2 tenants (in 7 wards) are licenced under the new selective licence system. These are not HMOs.

6.3 There are currently only 33 additional HMOs as the additional licencing only came into effect in March 2026. (June 2026).

6.4 Of the properties for 6 or less, 206 are in the wards not covered by the current HMO Direction 1 Article 4.

6.5 Of the 206, 197 are houses not flats. Data does not identify whether these are detached houses.

Table 4: Number of Licenced HMOs by Ward

Ward Name	No. HMOs *
Beam Park	10
Cranham	3
Elm Park	15
Emerson Park	10
Gooshays*	18
Hacton	4
Harold Wood	16
Havering-atte-Bower	18

Heaton*	39
Hylands & Harrow Lodge	17
Marshalls & Rise Park	10
Mawneys	14
Rainham & Wennington	23
Rush Green & Crowlands	28
South Hornchurch	17
Squirrel Heath	11
St Albans*	23
St Andrew's	8
St Edward's*	28
Upminster	2
Total	314

*Ward is largely covered by existing Article 4 relating to detached properties

6.6 Consideration of the evidence was undertaken using:

- Ward-level ASB complaint data (2/01/2024 – 16/02/2026)
- Ward population estimates
- HMO licensing and density data
- Complaint rate normalisation per 1000 residents
- Average complaint numbers per HMO by ward
- Count of detached houses in each ward that could potentially be impacted.
- Specific enforcement cases

ASB rates were calculated as:

$(\text{ASB complaints} / \text{Ward population}) \times 1,000$

6.7 This allowed proportional comparison between wards regardless of population size

7 HMO Complaints within Havering

Licencing Data

7.1 The complaints received in relation to HMO properties come from both neighbours and the residents of the HMO.

The type of complaints that relate to HMO properties include:

- Drainage
- Light Pollution
- Odour
- Noise music, shouting, TV

- Smoke
- Surface water
- Failure to licence
- Filthy and Verminous
- Overcrowding
- Disrepair
- Tenancy issues – eviction, harassment
- Pests
- Rubbish – litter, dangerous substances, volume

7.2 HMO complaints within the borough are concentrated on the western side, with Heaton, Rush Green & Crowlands, St Edward's, St Alban's, Hylands & Harrow Lodge and Mawneys being the wards with a high concentration of HMO-related complaints (e.g. rubbish, noise). This corresponds with a higher number of HMOs.

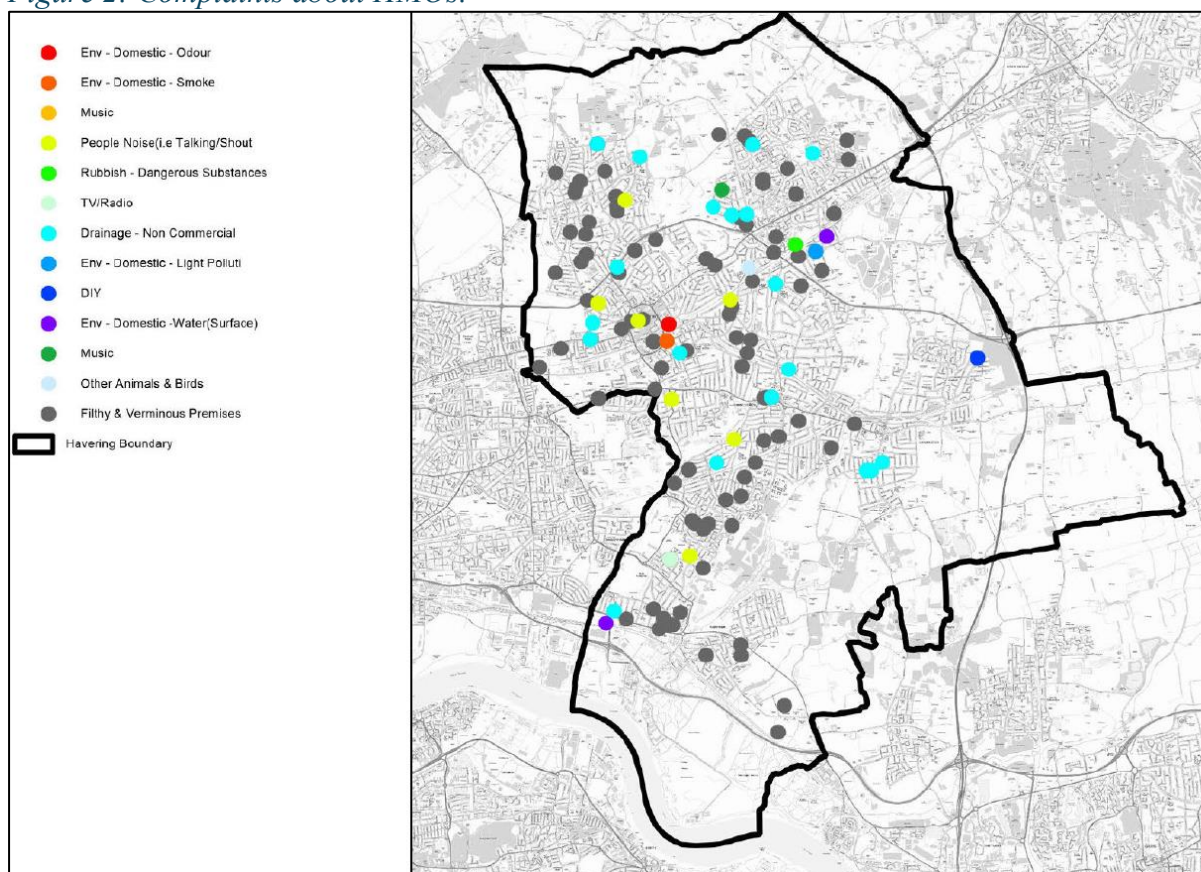
7.3 Data on HMO related complaints across the borough identify that there is merit in expanding the use of Direction 1, as high volumes of complaints are not confined to the wards originally identified.

7.4 The concentration of complaints generally aligns with the densities of known HMOs in the borough. While HMOs are present across the borough, density varies significantly by ward, with clustering of HMOs being apparent in the wards of Heaton, Rush Green & Crowlands, St Edward's, Rainham & Wennington, and St. Albans in particular.

7.5 Collectively, the five wards with the highest HMO density account for around 40% of all recorded ASB complaints borough-wide during the review period. This does also confirm that there are still a notable number of complaints, the 60% majority, being received across the borough beyond these five wards which does indicate that action to address these issues is required.

7.6 Generally, the fewest complaints relate to the wards with the fewest HMOs which would be expected. The three wards with the fewest HMOs are Cranham, Emerson Park, and Upminster, exceptionally, Cranham has a disproportionately high levels of complaints received. The two wards with low levels of HMOs and correspondingly low levels of complaints are Emerson Park and Upminster.

Figure 2: Complaints about HMOs.



Note that some data are obscured by other categories at the same location.

Table 5: Rate of ASB Complaints Received Relative to each Ward's Population and Average Complaints per HMO.

Ward Name	Popula- tion (2021 Census)	No. HMOs *	No. HMO Related ASB Complaints **	ASB Rate per 1000 Residents	Average Complaints per HMO ***	Av Complaints per HMO Rounded
Beam Park	7,442	10	152	20.4	15.02	15
Cranham	13,364	3	107	8	35.67	36
Elm Park	17,239	15	183	10.6	12.2	12
Emerson Park	9,662	10	2	>0.01	0.2	0.2
Gooshays	18,454	18	669	36.3	37.17	37
Hacton	9,085	4	52	5.7	13	13
OHarold Wood	14,614	16	52	3.6	2.25	3
Havering- atte-Bower	887,205	18	265	14.4	14.75	15
Heaton	18,10,	39	732	44.4	18.77	19
Hylands & Harrow Lodge	14,147	17	113	8	6.65	7

Marshall's & Rise Park	13,299	10	53	4	5.3	5
Mawneys	15,317	14	189	12.3	13.5	14
Rainham & Wennington	13,949	23	37	2.7	1.61	2
Rush Green & Crowlands	17,347	28	305	17.6	10.89	11
South Hornchurch	11,651	17	103	8.9	6.06	6
Squirrel Heath	16,044	11	15	0.9	1.36	1
St Albans	9,497	23	170	17.9	7.39	7
St Andrew's	15,043	8	93	6.2	11.63	12
St Edward's	11,327	28	139	12.3	4.96	5
Upminster	13,505	2	13	1	6.50	7
		314				

(2/01/2024 – 16/02/2026). In ward alphabetical order. Current Wards.

* Source: LBH Public Protection Licenced HMOs as of March 2026.

** Source: LBH Public Protection Complaints received Dates (02/01/2024-16/02/26)

***Calculated from Public Protection data.

7.7 Note that these are averages for comparison and complaints could be concentrated in far fewer premises.

Figure 3: Relative Number of Licenced HMOs by ward. (March 2026).

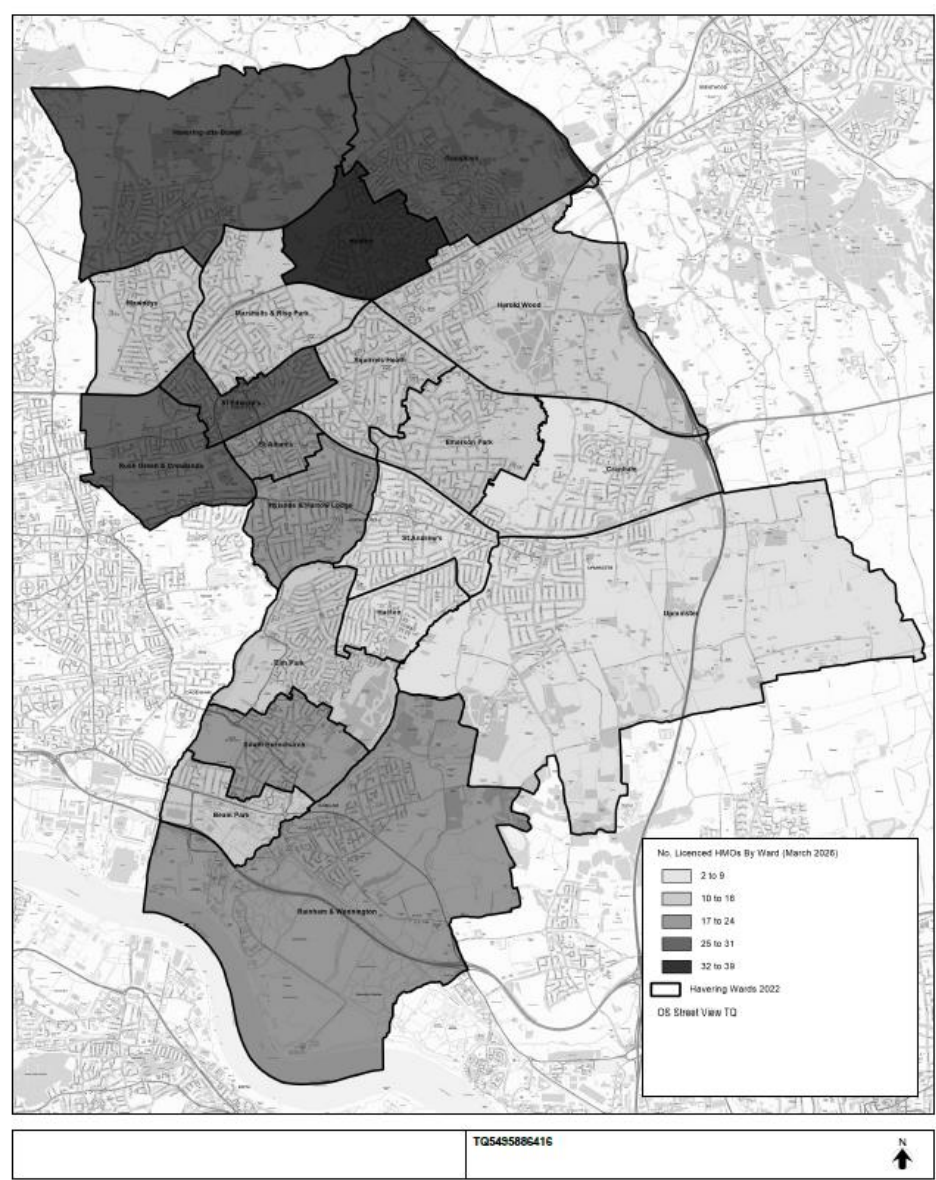


Figure 4: Complaint Numbers by Ward

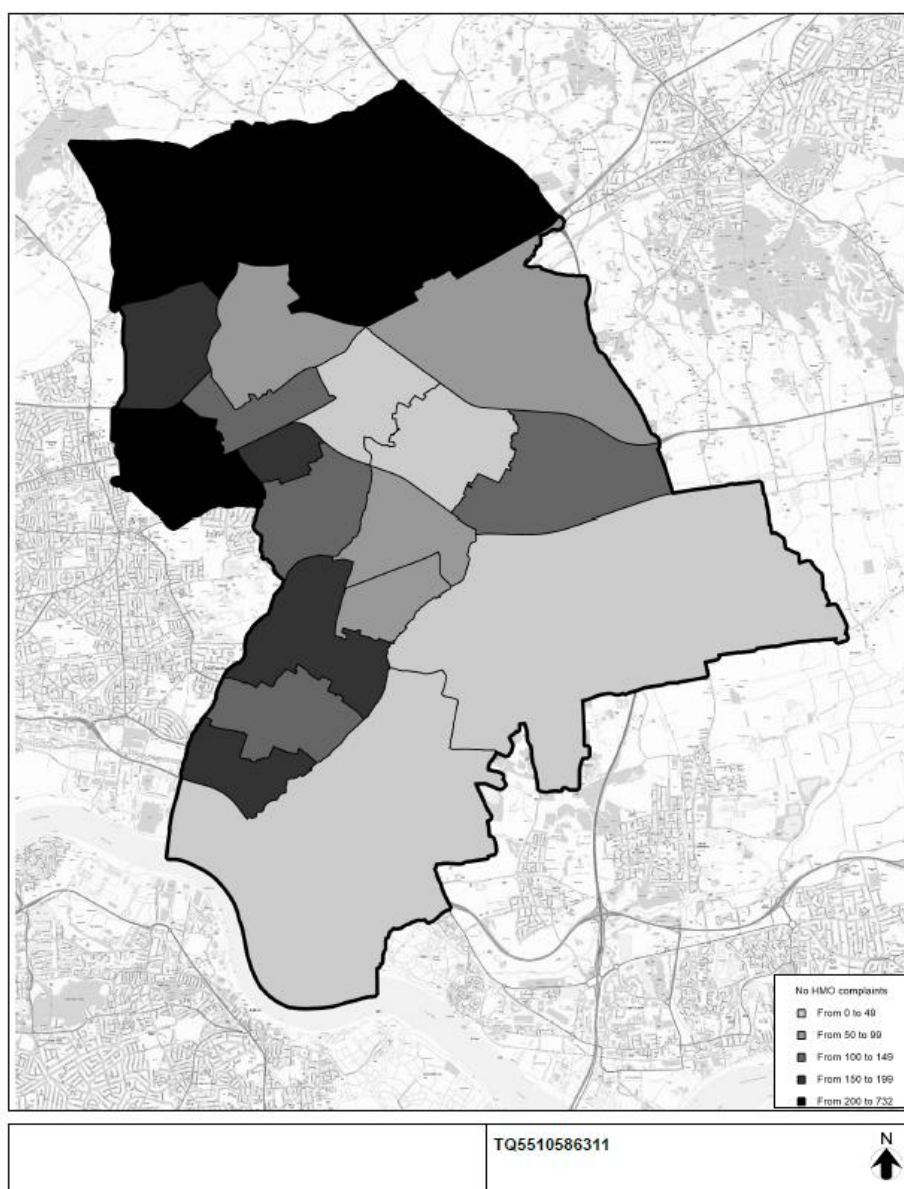


Table 6: Average Number of Complaints per HMO.
(From Table 4 above)

	Average no of complaints per HMO
Emerson Park	0.2
Squirrel Heath	1.36
Rainham & Wennington	1.61
Harold Wood	2.25
St Edward's	4.96
Marshalls & Rise Park	5.3
South Hornchurch	6.06
Upminster	6.50
Hylands & Harrow Lodge	6.65

St Albans	7.39
Rush Green & Crowlands	10.89
St Andrew's	11.63
Elm Park	12.2
Hacton	13
Mawneys	13.5
Haverling-atte-Bower	14.75
Beam Park	15.02
Heaton	18.77
Cranham	35.67
Gooshays	37.17

Note that this is an average and does not reflect that individual HMOs may have very high numbers of complaints and some few or none.

7.8 This calculation is purely for discussion purposes.

8 Detached Property Conversion

8.1 It has become evident that the Article 4 Direction 2 areas are experiencing a significant number of conversions to HMOs. Table 2 above give the count of detached houses in the borough, it shows that the housing stock in Havering is currently made up of high numbers of houses rather than flats, and of these a significant proportion are detached houses.

Detached Properties at risk

8.2 Evidence shows that there are a significant number of detached houses across the borough that could be at risk from redevelopment to an HMO without planning permission being needed from the Council.

8.3 Of the 10,574 detached houses in the borough, 9,610 are within the Article 4 Direction 2 area and are therefore offered no protection from the existing Directions.

8.4 The 22 cases of conversions listed in Annex 2 confirm that there is an identifiable, significant increase in conversion to HMOs in the Direction 2 Area. The location, quality and consideration of amenity would have been addressed in the planning process. Accordingly, this supports the widening of a full borough HMO Article 4 direction for all forms of housing.

Analysis of complaint numbers in relation to population

8.5 It is noted that 3 of the 5 highest HMO-dense wards by populations (Heaton (40.4), Rush Green & Crowlands (17.6), St Albans (17.9)) show ASB rates significantly above the borough average (12.16).

8.6 When looking at the specific types of ASB complaints by population, prevalent within the wards with a high concentration of HMOs, drug-related ASB complaints appear consistently within the top three types of ASB incidents in each ward, suggesting a recurring pattern in areas where HMO density is highest and indicating a potential association between high concentrations of HMOs and increased community safety concerns.

- The majority of wards have high levels of complaints with regard to existing HMOs, with the exception of Harold Wood and Upminster Wards. These two wards have very few HMOs and very few complaints accordingly.
- Among the wards with the highest number of recorded ASB complaints (relative to the wards' population), only Heaton, Rush Green & Crowlands, and St Albans appear as wards which also have a high concentration of HMOs.
- 40% of the borough's ASB complaints originate from the wards with the highest concentration of HMOs.

8.7 This suggests that:

8.8 Whilst there is a direct relationship between HMO numbers and complaints, there is a significant increase in HMO related complaints in areas where there are higher concentrations of HMOs, well above the average level of complaints per HMO in other wards.

9 Recommendation

9.1 It is recommended to replace the existing two HMO Article 4 Directions with a new single Direction across the borough removing the permitted change of use of any dwelling to an HMO. This would require planning applications to be submitted for all new HMOs.

9.2 This will address:

- The high number of detached houses at risk of uncontrolled conversion
- Ward boundary changes

9.3 Applications will fully consider:

- Areas of local over-concentration of HMOs
- Areas identified with issue of complaints
- Quality of the new HMO

Annexes

Annex 1: Summaries of Boroughs Evidence used in HMO Article 4 Directions

Borough	HMO Article 4 Direction details	Type of evidence used
Havering	Direction 1 Notice 4 Wards (All HMOs require planning permission Confirmed 03/11/2015 In force 13/07/2016	Impacts on neighbours complaints additional rubbish collections enforcement actions
Havering	Direction 2 Rest of borough (now 16 wards) All HMOs require planning permission EXCEPT in detached houses Confirmed 03/11/2015 In force 13/07/2016	Impacts on neighbours complaints additional rubbish collections enforcement actions
London Boroughs with HMO Article 4 Directions		
Redbridge	Borough-wide Confirmed 3/12/2018 Into force: 23/04/2019	Increase in PRS (private rental sector) and fall in owner-occupation Increase in HMOs concentration of HMOs in the south enforcement data indicates a borough wide issue Anti-social behaviour/ crime Residential noise and nuisance complaints Fly-tipping incidents Residential burglary Pressures on car parking and community infrastructure evidence of poor management and unsafe housing conditions overcrowding lack of balanced communities community concerns
Ealing	Borough-wide Notice of making the article 4 30/10/2024 Confirmed 11/07/2025 into force 14/11/2025	Significant growth in PRS displacement of owner occupation by PRS High volume of HMOs Increased complaints of poorly managed HMOs Anti-social behaviour noise and disturbances waste management issues negative impacts on the physical appearance of neighbourhood

		community concerns
Sutton	Borough-wide Non-immediate Article 4 Direction Notice of making 22/02/2024 Confirmed 26/11/2024	Parking pressure overcrowding increase in HMO allegations in planning enforcement data population churn loss of family homes need for larger homes HMOs in conservation areas and areas of special local character
Bromley	Immediate and non-immediate Article 4 Directions Immediate (2 wards) Notice of making 1/09/2021 Confirmed 8/02/2022 Non immediate (rest of borough) Notice of making 1/09/2021 Confirmation 8/02/2022 into force 1/09/2022	Details unavailable
Bexley	Borough-wide Article 4 Direction on HMOs Notice of making 16/09/2016 Confirmed 20/09/2017 Came into force 24/09/2017	Details unavailable
Enfield	Borough-wide Notice of making 17/10/2012 Confirmation 22/10/2013 Immediate direction came into force 23/10/ 2013	Shortage in family sized dwellings anti-social behaviour, noise, and nuisance imbalanced and unsustainable communities negative impacts on the physical environment and streetscape parking pressure increased crime growth in the PRS at the expense of owner-occupation pressure of community facilities restructuring of services and facilities to accommodate new demand 21 letters of support for article 4 vs 1 objection
Lewisham	Borough-wide Non-immediate Article 4 direction Notice of making 11/01/2023 Confirmation 6/06/2023	High concentration of HMOs in boroughs with unsuitable characteristics harmful concentration of HMOs in most wards ASB, noise, excessive waste pressing need for family housing displacement risk of developers from article 4 directions in neighbouring boroughs
Hillingdon	Borough-wide Notice of making 10/12/2025 Confirmation TBC	Significant growth in number of smaller HMOs concerns about changing character of communities concerns about reducing the supply of family homes Waste management issues ASB

		negative impact on area's appearance unmanaged clustering poor housing conditions growing community concerns
Lambeth	Targeted HMO Article 4 Direction 3 Wards only	Highest concentration of HMOs in 3 wards housing quality concerns high volume of complaints noise and ASB complaints significant link between HMOs and harm to residents
Barking & Dagenham	Borough- wide Article 4 Direction – excluding designated industrial land Notice of Making – 14 May 2011 Date of confirmation – 14 May 2012	Details unavailable
Harrow	Borough-wide Immediate effect compensation claims - immediate or lack of notice Under consultation until 12/07/2026	Numbers of households in private rented accommodation in each ward (2021 census) Housing type (2021 census) HMO accommodation type and size (2021 census) Licensing data (mapped showing broad locations across the borough from LHNA 2024) Enforcement complaints, ASB reports Community concerns (petitions, MP and Cllr enquiries Private Housing team – complaints/enquiries Need for family housing, housing register, homeless count
Authorities Outside London		
Brentwood BC	No Article 4 in place	N/A
Epping Forst DC	No Article 4 in place	N/A
Thurrock	No Article 4 in place	N/A
Basildon	Immediate Article 4 in 2 wards compensation claims - Borough -wide now proposed for remaining area	N/A

Annex 2: Enforcement Examples in Havering

Address	Ward	Details	
14 Elder Way, Rainham, RM13 9SX	Rainham & Wennington	Conversion of a detached dwelling house to a HMO with 3 rear doors.	Dashboard License for 6 self contained flats – did not need planning permission
100, Melville Road, Rainham, RM13 9TZ	Rainham & Wennington	Change of use of the dwelling to an HMO without planning permission Detached property	Dashboard Licenced for 6 households
20B Woburn Avenue, Hornchurch, RM12 4NG	Elm Park	Without planning permission, the change of use of a dwelling to a house in multiple occupation (C4 HMO) Detached Property	Dashboard Licence for 6 households
12 Ardleigh Close, Hornchurch, RM11 2SS	Squirrels Heath	Without planning permission, the change of use of the dwelling to an HMO Detached Property	Dashboard Licenced for 6 households
63 Askwith Road, Rainham, RM13 8EL	Beam Park	Change of use to a C4 HMO	Dashboard Licenced for 6 households
65 Askwith Road, Rainham RM13 8EL	Beam Park	NO DATA	Dashboard Licenced for 6 households
Victor Court Askwith Road, RM13 8EL	Beam Park	Alleged unauthorised House in Multiple Occupation	Dashboard Licenced for 5 households
19 Askwith Road, Rainham RM13 8EL	Beam Park	Change of use to house in multiple occupation (HMO licence application received) 04-04-25 Lawful use within a detached dwelling A4D area 2 to C4 HMO	Dashboard Licenced for 6 households
School House, Lowen Road, Rainham, RM13 8QR	Beam Park	Change of use from a dwelling to a C4 house in multiple occupation (HMO) 2. Alleged breach of conditions of P0192.25 (allowed on appeal): Condition 4 (5 vehicle parking spaces details to be agreed in writing then implemented) Condition 5 (not to be occupied until cycle stores, refuse and recycling enclosures constructed in accordance with	Dashboard Licenced for 8 households, would have required planning permission.

		drawings P06 and P07 and retained permanently -10-25: Lawful C4 HMO use in detached dwelling. 27-05-26: Granted: original breach and re-opened case about conditions now all complied with	
312 Wennington Road, Rainham, RM13 9DQ	Rainham & Wennington	Without planning permission, the change of use of a dwelling to a house in multiple occupation (HMO) or to six self-contained dwellings 23-10-25 Considered to be C4 HMO which is lawful change of use in A4D area 2	Dashboard Licenced for 6 households
292 Upminster Road North, Rainham, RM13 9JR	Rainham & Wennington	Change of use of the dwelling (C3) to an HMO (C4) 14-11-25 – Lawful new C4 HMO use	Dashboard Licenced for 6 households
48 Betterton Road, Rainham, RM13 8NB	South Hornchurch	Change of use from C3 dwelling to C4 HMO 9-09-25 - Standard 6 person / 6 unit HMO layout exempt from planning permission as A4 Direction area 2 permits the change of use of a detached dwelling to a C4 HMO.	Dashboard Licenced for 6 households
63 Betterton Road, Rainham RM13 8NB	South Hornchurch	Alleged unauthorised building works and possible HMO use 13-10-25 - The property is a bungalow and under refurbishment but no external works has been carried and it is not an HMO. No breach	Dashboard Licenced for 6 households
18 Elmer Gardens, Rainham, RM13 7BS	South Hornchurch	Without planning permission, the change of use of the property to a house in multiple occupation (Class C4) 28-07-25 - Occupancy confirmed as 6 persons maximum. Standard setup with 6 bedrooms with en-suites. Whilst would be refused permission (no living space internally whatsoever) unfortunately, the A4 direction's weakness is being exposed time and time again with the purchase and loft/rear extension to many detached dwellings, and the C4 use remains a permitted change.	Dashboard Licenced for 6 households
33a Elemer Gardens, Rainham RM13 7BS	South Hornchurch	1. Alleged unauthorised erection of rear extension. App refused Y0061.23 2. Alleged might become an HMO (17/5/23)	Dashboard Licenced for 6 households

Consultation 14 Stanley Road South, Rainham, RM13 8AA	South Hornchurch	Material change of use to C4 HMO (HMO licence application received) 04-04-25 Lawful C4 use change for detached dwelling in Article 4 Area 2	Dashboard Licenced for 6 households
Consultation 81 Allen Road, Rainham, RM13 9JX	Rainham & Wennington	1. Substantial reconstruction of dwelling 2. Possible use as an HMO 3. Rear dormer constructed in poor external finishing materials and possibly above ridge height (Added January 2025)	Dashboard Licenced for 6 households
Consultation 61 Havering Road, Romford, RM1 4QT	Mawneys	Change of use to a house in multiple occupation (HMO licence received) 08-07-25 E0022.25 approved for C4 HMO use	Can't find licencing info for this property
Jan House 21, Havering Road, RM1 4QT	Mawneys	NO DATA	Dashboard Licenced for 4 properties
Consultation 5 Stanley Road North, Rainham, RM13 8AX	South Hornchurch	1. Opening non- obscure side windows to rear dormer contrary to D0242.24 2. Change of Use to HMO (added 02.10.24) 27-06-25 Windows are no longer clear they have been sprayed and no longer able to see through them. HMO no breach detached property under 6	Dashboard Licenced for 6 households
Appeal 88 Eastern Road, RM1 3QA	St Edward's	Single storey rear extension C3 to C4 for 10 people Planning permission required for extension and change of use. Appeal document deadline 01/07/26	Appeal in progress. Not licenced
72 Eastern Road, Romford, RM1 3QA	St Edward's	NO DATA	Licenced for 6 households

