

**REGULATORY SERVICES  
COMMITTEE**

**11 January 2018**

<b>Reference No. &amp; Site address</b>	<b>P1619.17 Dunelm Romford, Eastern Avenue West, Romford, RM7 7JN</b>
<b>Subject Heading:</b>	<b>Installation of new mezzanine floor of 2382 square metres (Application received 06 October 2017)</b>
<b>Ward:</b>	<b>Brooklands</b>
<b>SLT Lead:</b>	<b>Steve Moore Director of Neighbourhoods</b>
<b>Report Author and contact details:</b>	<b>Paul Roberts Principal Planning Officer Paul.roberts@<a href="mailto:Paul.roberts@havering.gov.uk">havering.gov.uk</a> 01708 434079</b>
<b>Policy context:</b>	<b>Local Development Framework The London Plan National Planning Policy Framework</b>
<b>Financial summary:</b>	<b>Not Relevant</b>

**The subject matter of this report deals with the following Council Objectives**

Communities making Havering	[X]
Places making Havering	[X]
Opportunities making Havering	[X]
Connections making Havering	[X]

## **SUMMARY**

The proposal is for the installation of a mezzanine within the existing building covering 2382 square metres. No external works will occur save for the addition of cycle parking stands for 14 bikes. The retailer sells a range of household goods, soft furnishings and furnishing products

The application raises issues in respect of the impact of the development on the vitality and viability of nearby town centres, highway capacity and safety, access and local employment opportunities. The impact of neighbouring amenity is also an issue as are matters of congestion, parking and access.

The proposal is considered to be acceptable in all material respects and it is recommended that planning permission is granted subject to conditions and a s106 legal agreement.

## **RECOMMENDATIONS**

That the proposal is unacceptable as it stands but would be acceptable subject to the applicant entering into a Legal Agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) by 10<sup>th</sup> May 2018, to secure the following obligations. In the event that the Section 106 agreement is not completed by such date then the application shall be refused returned to the committee for reconsideration:

- A local employment opportunity framework or a commuted sum, agreed with the Local Planning Authority (value to be confirmed), to provide alternative local employment initiatives if the applicant is unable to provide an appropriate level of opportunities on-site.

That the Assistant Director of Development be authorised to enter into a legal agreement to secure the above and upon completion of that agreement, grant planning permission subject to the conditions set out below:

### **1. Time Limit**

The development to which this permission relates must be commenced not later than three years from the date of this permission.

**Reason:** To comply with the requirements of section 91 of the Town and Country Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

## 2. In Accordance with Plans

The development hereby permitted shall not be carried out otherwise than in complete accordance with the approved plans (as set out on page one of this decision notice).

**Reason:** The Local Planning Authority consider it essential that the whole of the development is carried out and that no departure whatsoever is made from the details approved, since the development would not necessarily be acceptable if partly carried out or carried out differently in any degree from the details submitted. Also, in order that the development accords with Development Control Policies Development Plan Document Policy DC61.

## 3. Cycle Storage

Notwithstanding the approved drawings details of 14 cycle spaces in accordance with TfL's London Cycling Design Standards shall be submitted to and approved in writing by the Local Planning Authority. The cycle storage shall be installed on-site prior to the occupation of the approved development and permanently retained thereafter.

Reason:-

Insufficient information has been supplied with the application to demonstrate what facilities will be available for cycle parking. Submission of this detail prior to occupation in the case of new building works is in the interests of providing a wide range of facilities for non-motor car residents and sustainability.

## 4. No food to be sold

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) there shall be no sale of food (other than confectionary and the sale of food and beverages within the ancillary cafe) from the building.

Reason:-

To preserve the vitality and viability of local town centres.

## 5. Construction Methodology

No works shall take place in relation to any of the development hereby approved until a Construction Method Statement to control the adverse impact of the development on the amenity of the public and nearby occupiers is submitted to and approved in writing by the Local Planning Authority. The Construction Method statement shall include details of:

- a) parking of vehicles of site personnel and visitors (to be restricted to the service yard);
- b) storage of plant and materials (to be restricted to the service yard);
- c) dust management controls;
- d) measures for minimising the impact of noise and, if appropriate, vibration arising from construction activities;
- e) predicted noise and, if appropriate, vibration levels for construction using methodologies and at points agreed with the Local Planning Authority;
- f) scheme for monitoring noise and if appropriate, vibration levels using methodologies and at points agreed with the Local Planning Authorities;
- g) siting and design of temporary buildings;
- h) scheme for security fencing/hoardings, depicting a readily visible 24-hour contact number for queries or emergencies;
- i) details of disposal of waste arising from the construction programme, including final disposal points. The burning of waste on the site at any time is specifically precluded.

And the development shall be carried out in accordance with the approved scheme and statement.

Reason:-

Insufficient information has been supplied with the application in relation to the proposed construction methodology. Submission of details prior to commencement will ensure that the method of construction protects residential amenity. It will also ensure that the development accords the Development Control Policies Development Plan Document Policy DC61.

## 6. A12 Access

Details of the proposed dropped kerb (or other suitable design solution) on the footway to the east of the vehicular entrance to the site from the A12 shall be submitted to and approved by the Council in consultation with Transport for London (TfL), prior to the commencement of development. The improvement works shall be delivered prior to the occupation of the development and retained thereafter.

Reason:-

In the interest of ensuring good design and enhanced public safety and to comply with policies of the Core Strategy and Development Control Policies, namely CP10, DC32, DC34 and DC35.

## 7. Access

Prior to the commencement of development, details of safe access from the A12 into the site for pedestrians, and those with impaired mobility, shall be submitted to and approved by the Council prior to the commencement of development. The improvement works shall be delivered prior to the occupation of the development and retained thereafter.

Reason:-

In the interest of ensuring good design, enhanced public safety and improved accessibility to comply with policies of the Core Strategy and Development Control Policies, namely CP10, DC32, DC34, DC35 and DC61.

8. Hours of operation

The premises shall not be used for the purposes hereby permitted other than between the hours of 0800 – 2000 on Monday to Friday, 0800 to 1800 on Saturdays and 1030 to 1700 on Sundays, Bank or Public Holidays without the prior consent of the Local Planning Authority.

Reason:-

To preserve the amenity of local residents.

## **INFORMATIVES**

1. Statement Required by Article 35 (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015: No significant problems were identified during the consideration of the application, and therefore it has been determined in accordance with paragraphs 186-187 of the National Planning Policy Framework 2012.

2. **Highways**

The Applicant is advised that planning approval does not constitute approval for changes to the public highway. Highway Authority approval will only be given after suitable details have been submitted, considered and agreed. Any proposals which involve building over the public highway as managed by the London Borough of Havering, will require a licence and the applicant must contact StreetCare, Traffic & Engineering on 01708 433750 to commence the Submission/ Licence Approval process.

Should this application be granted planning permission, the developer, their representatives and contractors are advised that this does not discharge the requirements under the New Roads and Street Works Act 1991 and the Traffic Management Act 2004. Formal notifications and approval will be needed for any highway works (including temporary works) required during the construction of the development.

The developer is advised that if construction materials are proposed to be kept on the highway during construction works then they will need to apply for a license from the Council.

3. The planning obligation recommended in this report has been subject to the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 and the obligations are considered to have satisfied the following criteria:-
  - (a) Necessary to make the development acceptable in planning terms;
  - (b) Directly related to the development; and
  - (c) Fairly and reasonably related in scale and kind to the development.
4. With regards to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

## REPORT DETAIL

### **1. Site Description**

- 1.1 The application relates to the premises at the Dunelm furnishing store on the south side of Eastern Avenue West, approximately 100 metres west of the junction with North Street in Romford. The site currently consists of a single storey retail building and parking for 176 cars. Access for vehicles is provided off Eastern Avenue West, via an access road that does not comprise a separate footway. Pedestrian access can be secured via a small gap in a wooden fence bounding the site on Cedar Road. The site covers 1.2 hectares and is located adjacent to housing to the east and south. The river Rom is located at the western edge of the site beyond which is the Western Avenue Retail Park.
- 1.2 Eastern Avenue West consists of 4 lanes of carriageway separated by a barrier. This road has a mixture of commercial activities although King George Playing Fields is located north west of the site. The site lies within a Flood Zone 2 area.

### **2. Description of Proposal**

- 2.1 The application proposes the installation of a mezzanine extension covering 2,382 square metres. The gross floorspace of the existing store would

increase from 4,530 square metres presently to 6,420 square metres. The upper floor would be accessed by internal stairs and a lift.

- 2.2 No external changes to the building are proposed. Seven 'Sheffield' cycle stands would be provided to the front of the store.

### **3. Relevant History**

- 3.1 P0917.17 Installation of a new glazed shopfront, creation of a new paved pedestrian refuge and realignment of parking spaces. Approved July 2017.
- 3.2 P0551.09 Replacement of existing vertical metal cladding with horizontal metal cladding and new colour scheme for the building. Installation of new perimeter railings and brickwork wall and canopy to the site entrance area and redecoration of the existing railings and walls.
- 3.3 D0003.06 Internal alterations to building, comprising installation of mezzanine. Certificate of Lawfulness approved March 2006.
- 3.4 P0830.02 Extension to building to create additional retail unit; new entrance doors and elevational alterations with associated revisions to parking and service areas. Approved October 2002. Dunelm occupied both the former MFI unit and the new floorspace created.

### **4. Consultations/Representations**

- 4.1 Notification letters were sent to 64 properties and the scheme was also advertised via site notice and in the local press. At the time of writing this report no responses to the consultation exercise have been received
- 4.2 The following consultation responses have been received:
- LBH Highways: Objects to the proposals on the basis of the lack of safe and accessible access from the A12 for people walking and cycling.
  - Metropolitan Police Design Out Crime Officer: No comment.
  - LBH Environmental Health: No objections in respect of land contamination, noise and air quality.
  - LBH Waste and Recycling: Requests that guidance notes in respect of commercial waste are followed.
  - Transport for London: No objections subject to no impingement on the safe operation of the A12 during construction works. TfL also consider that the entrance to the site (A12) would benefit from improvements for pedestrians and cyclists crossing the entrance, to promote sustainable modes and ensure public safety.
  - Thames Water: No comments, application should be determined in accordance with national and local policy guidance.
  - London Fire and Emergency Planning Authority: No comments.
  - London Fire Brigade Water Team, no comments.

## **5. Relevant Policies**

- 5.1 Policies CP2 (Sustainable Communities), CP3 (Employment), CP4 (Town Centres), CP9 (Reducing the need to travel), CP10 (Sustainable Transport), CP15 (Environmental Management), CP17 (Design), DC15 (Locating Retail and Service Development), DC32 (The Road Network), DC33 (Car Parking), DC34 (Walking), DC35 (Cycling), DC36 (Servicing), DC40 (Waste Recycling), DC48 (Flood Risk), DC49 (Sustainable Design and Construction), DC50 (Renewable Energy), DC51 (Water Supply, Drainage and Quality), DC52 Air Quality, DC55 (Noise), DC56 (Light), DC57 (River Restoration), DC59 (Biodiversity in New Developments), DC61 (Urban Design), DC62 (Access), DC63 (Delivering Safer Places), and DC72 (Planning Obligations) of the Local Development Framework Core Strategy and Development Control Policies Development Plan Document are considered to be relevant.
- 5.2 Other relevant documents include Designing Safer Places SPD, Landscaping SPD, Planning Obligations SPD and the Sustainable Design and Construction SPD.
- 5.3 Policies 2.7 (Outer London: Economy), 2.8 (Outer London: Transport), 2.15 (Town Centres), 3.1 (Ensuring Equal Life Chances For All), 3.2 (Improving Health and Addressing Health Inequalities), 4.7 (Retail and Town Centre Development), 4.8 (Supporting a Successful and Diverse Retail Sector and Related Facilities and Services), 4.12 (Improving opportunities for All), 5.2 (Minimising Carbon Dioxide Emissions), 5.3 (Sustainable Design and Construction), 5.6 (Decentralised Energy in Development Proposals), 5.7 (Renewable Energy), 5.9 (Overheating and Cooling), 5.10 (Urban Greening), 5.11 (Green Roofs and Development Site Environs), 5.12 (Flood Risk Management), 5.14 (Water Quality and Wastewater Infrastructure), 5.15 (Water Use and Supply), 6.3 (Assessing Effects of Development on Transport Capacity), 6.5 (Funding Crossrail and Other Strategically Important Transport Infrastructure), 6.9 (cycling), 6.10 (walking), 6.12 (Road Network Capacity), 6.13 (parking), 7.1 (Lifetime Neighbourhoods), 7.2 (An Inclusive Environment), 7.3 (Designing Out Crime), 7.14 (Improving Air Quality), 7.15 (Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes), 7.19 (Biodiversity and Access to Nature), 7.24 (Blue Ribbon Network), 7.27 (Blue Ribbon Network: Supporting Infrastructure and Recreational Use), 7.28 (Restoration of the Blue Ribbon Network), and 8.2 (Planning Obligations) of the London Plan, are material considerations.
- 5.4 The National Planning Policy Framework, specifically Sections 1 (Building a strong competitive economy), 2 (Ensuring the vitality of town centres), 4 (promoting sustainable transport), 8 (Promoting healthy communities), 10 (Meeting the challenge of climate change, flooding and coastal change), and 11 (Conserving and enhancing the natural environment), are relevant to these proposals.



## 6. Staff Comments

- 6.1 The main considerations relate to the principle of the development, the impact of the retail expansion on the vitality and viability of Havering's town centres, the impact of the proposal on existing residential amenity, the suitability of the proposed parking, access and servicing arrangements, the impact of the development on safety and flow of the local highway network, and the integration of the scheme into the pattern of local development

### ***Principle of Development***

- 6.2 The site lies within the Eastern Avenue West retail park, an out of town centre as identified on the Havering Proposals Map. The application seeks the expansion of the existing store to extend the offer of furnishing at the premises to include nursery bedding, furnishing and accessories as well as car seats and prams/buggies. The additional jobs on offer (11 additional part-time roles) at the store will be of benefit to the local residents and the increase in employment opportunity this scheme provides is welcomed.
- 6.3 Policy 4.7 of the London Plan notes that in making decisions on retail development, the focus should be on sites within town centres. If none are available they should be on sites that are, or can be well integrated with the existing centre and public transport, and proposals for out of centre development will be subject to an assessment of impact. Paragraph 4.45 states that extensions to out of centre retailing can *"compromise the strong town centres first policy which is essential to London's development as a sustainable, liveable city as well as exacerbating road traffic congestion, and for the large numbers of Londoners who do not have a car, undermining this Plan's social inclusion policies."*
- 6.4 Policy CP4 of Havering's Core Strategy and Development Control policies DPD sets out the hierarchy of town centres within the Borough from the Metropolitan Centre of Romford, the Major and Minor District Centres to Major and Minor Local Centres. The policy states that the town centre hierarchy will be promoted and enhanced by amongst others:
- directing retail development to the borough's town centres through the 'sequential test',
  - and ensuring the scale and use of new development is consistent with the role and function of centres and does not harm the vitality and viability of other centres.
- 6.5 Policy DC15 of the LDF states that planning permission for retail and service development and extensions to, or the redevelopment of existing edge of centre and out of centre retail stores over 200 square metres (including mezzanines), will only be granted where the sequential test is satisfied, unless specific exceptions stated in the policy apply. There are considered to be no relevant exceptions that apply and therefore, in accordance with policy a sequential test was requested of the applicant at pre-application stage and one was submitted with the proposal documents.

## Sequential Exercise

- 6.6 Paragraph 24 of the NPPF sets out that LPAs should apply a Sequential Test to planning applications for main town centre uses which are not in an existing centre and are not in accordance with an up-to-date development plan. The order of preference for the sequential approach is:

- 1) locations within existing centres;
- 2) edge-of-centre locations, with preference given to accessible sites that are well-connected to the centre; and then
- 3) out-of-centre sites, only in circumstances where there are no in-centre or edge of centre sites available.

Preference should be given to accessible sites that are well-connected to the town centre and flexibility should be shown by applicants and planning authorities on matters such as format and scale.

- 6.7 The sequential exercise conducted by the applicant looked at sites capable of accommodating a retail unit of between 5495sqm and 6465 sq.m. with off-street parking for at least 130 cars, in or adjacent to Romford Town Centre, and available now or in the near future. This scoping of sites is considered to be appropriate and proportionate to this application with it evidencing some flexibility in sites considered, in terms of the size of the proposed unit and also the amount of parking required (limited to 130 spaces - 35 less than on the Dunelm site).
- 6.8 The six sites reviewed form part of the Romford Area Action Plan. These being: Angel Way; Bridge Close; Como Street; 18-46 High Street; 37-59 High Street and Station Gateway and Interchange. These are reviewed below.
- 6.9 The applicant's sequential test states that the Angel Way site is not available to the applicant, and in addition the retail units that form part of the site's existing permission vary in size from 473 sq.m. to 1803 sq.m. and therefore would not be able to accommodate the proposed development. Bridge Close was considered and discounted because of the Council's allocation of the site for a mix of residential and Class A3 retail uses, ones that do not incorporate the Class A1 proposed by Dunelm for the site. In addition, the vision for the site is not the single retail form as practised by Dunelm but rather a comprehensive residential led redevelopment alongside other improvements, a form of development this applicant is not capable of providing. According to the sequential test the Como Street site is of insufficient size to accommodate the proposed retail unit and the sole use of the site for retail development would be inconsistent with policy objectives to redevelop the site. The 2 High Street sites, 18-46 and 37-59 were reviewed and both discounted because of their limited size and the Council's desire to see comprehensive redevelopment of these sites incorporating a significant amount of residential, a form of development Dunelm do not deliver. The final site, Station Gateway and Interchange, is a larger site with an allocation

for a significant mixed use redevelopment of land around Romford Station, a form of development that the applicant is not capable of bringing forward.

- 6.10 The applicant also undertook an online search of sites currently available for sale or let within Romford town centre. None of the number found were of the scale to accommodate the existing Dunelm unit never mind the proposed extended store. Having regard to the specific nature of the proposed retail format and the sequential test submitted with the application, Staff are satisfied that no sequentially preferable alternative sites have been identified and that, as a defined 'out of centre' retail site, the application site is suitable, in policy terms, for the proposed use.

#### Retail Impact Assessment

- 6.11 Paragraph 26 of the NPPF states that where assessing applications for retail development which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (or a default threshold of 2,500 square metres if the figure has not been set locally.) The 2,500 square metres threshold is relevant in this case, as the Council does not have a locally set threshold.
- 6.12 At 1,890 square metres the additional floorspace is below this threshold, nevertheless, the applicant has for completeness undertaken an assessment to calculate the likely impact of the store expansion on the vitality and viability of Romford town centre. The report provides an assessment of the likely trade diversion arising from the mezzanine floorspace on the town centre, concluding that approximately 20% of the additional turnover (£0.9m) would be drawn from Romford town centre, an impact of 0.2% on the money spent on comparison goods shopping in the Centre. This level of impact (having regard to the overall health of the town centre) is not significantly adverse. It is anticipated that the bulk of the turnover drawn to the expanded store will come from similar out of town furnishing operators in the region such as those located at Gallows Corner.
- 6.13 The conclusions of the report are considered to be sound and have taken into account the findings of the Council's 2015 Retail Study. Taking these factors into account Officers are satisfied that the proposal is unlikely to compromise the retail vitality and viability of Romford Town Centre.
- 6.14 The existing premises is subject to a condition which restricts the sale of food from this site (except confectionary) to safeguard Havering's town centres. It is considered appropriate to attach a condition to the same should this application be approved.

#### ***Impact on Amenity***

- 6.15 The application premises is situated at the eastern edge of a retail park accessed directly off the A12. The nearest residential houses are on Burnham Road some of which overlook the car park. Any impact on amenity

will be mostly confined to vehicle movements and people leaving and returning to their cars, the number of which is expected to grow to a maximum of approximately 40% at peak time on Saturday lunchtime with 158 arrivals between 1145 and 1245 as compared to the existing 111. The PM peak (1700-1800) will see arrivals increase from approximately 40 vehicles to 57. Although these movements are relatively significant in percentage terms it is not considered that the nature and scale of the activity (cars being parked and people exiting/entering vehicles) will be significantly different so as to be apparent and detrimental to neighbouring residential amenity. As noted the entry/exit to the car park is on the busy A12, away from housing and the car park is for the most part set away from dwellings and as such impact is not considered to be acute. Moreover, the car park even at peak time is likely to operate at less than 70% of its capacity, thereby alleviating any concern of the potential additional noise and disturbance associated with a car park operating close to, or at capacity. The previous extension permission for the site (LBH Ref: P0830.02) included a condition restricting hours of use to limit any noise and disturbance for nearby residents during unsocial hours. It is considered appropriate to repeat the condition for this extension.

- 6.16 As the works are internal there will not be impacts in terms of privacy, daylight and outlook. To safeguard neighbouring amenity during the construction phase it is recommended that a condition is attached requiring the submission and approval of a Construction Management Plan prior to works starting, including a requirement that during this phase the parking of vehicles and the storage of material is located in the existing service yard adjacent to the A12, and away from housing.

### ***Environmental Issues***

- 6.17 The Council's Environmental Health team have raised no objections in relation to any historical contaminated land issues. The site is located within a Flood Zone (Zone 2) but the works are exclusively internal and present no issues in relation to local flood risk.

### ***Parking and Highway Issues***

- 6.18 Policy 6.13 of the London Plan states that an appropriate balance between promoting new development and excessive car parking which can undermine cycling, walking and public transport use should be reached. In this instance the application site is located within an area with a Public Transport Accessibility Level (PTAL) rating of 3, meaning that the site offers an average degree of access to surrounding public transport.
- 6.19 The application has demonstrated via the submitted Transport Statement that there will not be any significant impact on the safe operation of the A12. Traffic movements are expected to increase as a result of the development but not to an extent prejudicial to highway safety.

- 6.20 The London Plan maximum car parking standards for non-food retail in this location is 1 space per 30-50 square metres of development, equating to a maximum of 128-214 parking spaces for the store if the mezzanine was approved. Based on existing customer patterns at peak hour operation (Saturday lunchtime), the maximum number of parking spaces that would be occupied is anticipated to be in the order of 115, an amount substantially lower than the 176 parking spaces provided in the car park. Hence, it is felt that the additional floorspace will not prejudice the availability of on-street car parking in the roads surrounding the site, even with a significant upturn in customer parking at this site over and above what is anticipated with the enlarged sales area. Moreover, the improved pedestrian accessibility and enhanced cycle parking provision highlighted below will serve to encourage non-vehicular travel to the store.
- 6.21 The applicant has stated that 14 cycle parking spaces will be provided. Full details of these spaces are required via planning condition, to ensure that they are secure and covered for the benefit of employees as well as customers, in accordance with the London Cycling Design Standards.
- 6.22 The applicant has not submitted details of construction accompanying this proposal. As stated a condition requiring the submission of a Construction Management Plan is recommended to amongst other matters ensure that the safe operation of the A12 is not prejudiced.

### ***Accessibility***

- 6.23 Policy CP10 of the Core Strategy states that in order to promote sustainable transport, "new developments in their design and layout prioritise the needs of pedestrians and cyclists and minimise the distance to local public transport nodes". Policy DC15 amongst other factors states that the applicant must justify the location of their retail development in terms of, "the accessibility of the site in terms of public transport, cyclist and pedestrian access and how car borne traffic will be minimised". Policies DC34 and DC35 seek to ensure that developers take account of the need of pedestrians and cyclists.
- 6.24 The site does not currently have safe and secure access from the A12 for people walking and cycling. The pavement stops at the eastern edge of the entrance to the site from the A12 without a dropped kerb and no separate link is provided for pedestrian or cyclists into the site, so that non car users are obliged to share the space with cars on a road situated straight off a busy and fast carriageway. This is not an attractive or safe route for people and does not encourage sustainable transport alternatives, including those travelling to the site via local bus routes. Indeed, it serves to exclude people with mobility issues entering or leaving the site except when in a vehicle.
- 6.24 The applicant claimed in their submission that pedestrian access is currently gained off Cedar Road and would continue to do so following this development. However, a site visit has revealed that this approach to be seriously lacking in design and access terms. The pedestrian entrance on

Cedar Road is via a small gate within a wooden boundary fence, a gate which catches on a slope entering the car park so as to not open fully and one that leads the pedestrian directly onto a marked parking space. This may be acceptable for the applicant in terms of existing store arrangements, however in the context of this submission, no attempt to enable all people to access this larger store is neither desirable nor acceptable.

- 6.25 Policy is clear on this matter and the applicant was advised during the pre-application submission of this deficit in the scheme and the requirement to rectify it. In that regard, it is considered essential that any approval of this scheme encompass conditions requiring the submission of an appropriate access to the store for all customers and to encourage the use of sustainable forms of transport, including improvements to the access to the site off the A12.

### ***Employment***

- 6.26 The applicant anticipates that this development will create an additional 11 part-time jobs. In the interests of supporting the local community it is considered a commitment towards employment opportunities for Havering residents could be secured via legal agreement. If the applicant is unable to provide an appropriate level of opportunity for operational reasons a commuted sum based on a formula agreed with the Council's Economic Development department, could be secured. Such an obligation is considered appropriate in this instance, in context of the policy position outlined in DC13 of the Core Strategy.

### ***Mayoral Community Infrastructure Levy***

- 6.27 The proposed development is not liable for Community Infrastructure Levy.

## **7. Conclusion**

- 7.1 The applicant has demonstrated that the proposed extension of a retail store in this out of town location would not have a detrimental impact on Havering town centres, in particular Romford Metropolitan Centre. The expanded store will serve to increase the retail offer at the site and have a positive benefit on local employment opportunities.
- 7.2 The impact on neighbouring amenity will not be significant and the extension will not prejudice the safe operation of the public highway. The current access arrangements are deficient and will be made even more so if this application was allowed to continue in the form submitted. Hence, planning conditions are proposed which will serve to make the store fully accessible to all residents, improve the level of public safety at the entrance to the site and also encourage the use of more sustainable forms of transport.
- 7.3 It is therefore recommended that the application be approved subject to planning conditions and a legal agreement.

## **IMPLICATIONS AND RISKS**

### **Financial implications and risks:**

Financial contributions may be sought through the legal agreement.

### **Legal implications and risks:**

Legal resources would be required to prepare and complete the required Section 106 legal agreement. Staff are satisfied that the contribution and obligations suggested are compliant with the statutory tests set out in the CIL Regulations relating to planning obligations.

### **Human Resources implications and risks:**

None.

### **Equalities implications and risks:**

The Council's planning policies are implemented with regard to equality and diversity.

## **BACKGROUND PAPERS**

Application form, supporting statements, and drawings received 6 October 2017, and additional plans received on 16 October 2017.