



<b>Application Reference:</b>	<b>P1917.18</b>
<b>Location:</b>	<b>ST GEORGE'S HOSPITAL, SUTTONS LANE, HORNCHURCH</b>
<b>Ward</b>	<b>HACTON</b>
<b>Description:</b>	<b>DEMOLITION OF EXISTING BUILDINGS, CONVERSION OF THE FORMER ST GEORGE'S HOSPITAL ADMINISTRATIVE BUILDING AND THE ERECTION OF NEW BUILDINGS TO PROVIDE 162 RESIDENTIAL UNITS (CLASS C3) INCLUDING CAR PARKING, CYCLE PARKING, LANDSCAPING AND ASSOCIATED INFRASTRUCTURE ALONG WITH THE REFURBISHMENT OF THE SUTTONS BUILDING FOR USE AS A HERITAGE CENTRE (CLASS D1)</b>
<b>Case Officer:</b>	<b>RAPHAEL ADENEGAN</b>
<b>Reason for Report to Committee:</b>	<ul style="list-style-type: none"><li>• <b>The application is within the categories which must be referred to the Mayor of London under the Town and Country Planning (Mayor of London) Order.</b></li><li>• <b>The application is of strategic importance and therefore must be reported to the Committee.</b></li></ul>

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## **1 BACKGROUND**

- 1.1 Members would recall the site visit of 19 July 2018 where members were shown around the site with particular attention to the exterior and interior of one of the frontage ward blocks which was at that time earmarked for retention and conversion. Members were able to appreciate the full extent of the structural

defects of the buildings and the difficulties that these would present for a scheme which intended large scale retention whilst still required to meet modern day standards. As a result Members were sympathetic to the idea that the frontage ward blocks be demolished and rebuilt to a near identical design, incorporating as many of the original features and details as possible, but giving the opportunity for the new dwellings to be built to modern standards and to give a full lifetime of use.

- 1.2 The submitted proposals have embraced and developed this approach for the blocks either side of the original central administration block which is still to be retained and refurbished.
- 1.3 This report sets out the detailed considerations for the major planning application on land at former St George's Hospital in Hornchurch. The application is for a mixed use development which is residential led and would deliver 162 new homes and creation of a heritage centre (D1 use) as part of the redevelopment of the former hospital site to provide a total 352 new homes as well as public and private open space, landscaping and other benefits. The following report will set out the material planning considerations as they relate to each main issue. The report will also give a detailed review of the proposed development as well as considering the potential impacts, in terms of Green Belt and heritage asset which can be positive or negative, as addressed by the submitted supporting statements including heritage statement.

## **2 SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- 2.1 The principle of redevelopment of the former hospital site has already been established through the granted of planning permission under ref: P0321.15 allowed at appeal under reference APP/B5480/W/16/3153859 dated 13 July 2017: Hybrid application for redevelopment of the St George's Hospital site inclusive of partial demolition and conversion of existing buildings to provide up to 290 dwellings, on 10.0 ha of the wider site, together with associated car parking, landscape and infrastructure works. This current application relates to Phase 2 of the approval and seeks to now demolish the buildings shown to be retained and converted to residential dwellings. The proposed development would provide 162 new homes and refurbishment of the Suttons building for use as a heritage centre (Class D1) fronting Suttons Lane
- 2.2 The redevelopment of the former St. Georges Hospital site is in three segments. The application site is the central segment of the three comprising six blocks and the Suttons Building located at the bottom southwestern corner of the hospital site. The site is currently occupied by old hospital buildings depicting the era that they were constructed albeit considered to have heritage value due to their age and use as a military hospital. The proposed redevelopment of the site would be a positive contribution to this area of Hornchurch bringing back a disused site back to use. The loss of the former hospital buildings, though regrettable given their sizes, is afforded no protection in the adopted development plan. The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, and good routes, access and makes a positive contribution to the local area, in terms of quality and character.

- 2.3 The proposed development would secure the provision of onsite affordable housing. Overall, the number of units proposed would positively add to the Council's housing delivery targets.
- 2.4 The proposed redevelopment of the site would result in a modern, contemporary design that responds positively to the local context, and would provide appropriate living conditions which would be accessible for all future occupiers of the development.
- 2.5 The proposed redevelopment of the site would result in a modern, contemporary design that responds positively to the local context, and would provide appropriate living conditions which would be accessible for all future occupiers of the development.
- 2.6 The principal planning considerations arising from the proposals are the acceptability of the redevelopment of this Green Belt site in principle and the impact upon the Green Belt of the developments proposed, the impact of the proposals in terms of design, layout, scale and appearance, landscaping proposals, environmental implications, affordable housing, mix and tenure, parking and highway issues, the impact on local amenity and on community infrastructure.
- 2.7 The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2018), the policies of The London Plan (2016), Havering's Core Strategy and Development Control Policies Development Plan Document (2008), as well as to all relevant material considerations including the responses to consultation.

### **3 RECOMMENDATION A**

- 3.1 That the Committee resolve to GRANT planning permission subject to: c
1. agree the reasons for approval as set out in this report, and
  2. refer this application to the Mayor of London (the GLA) as a Stage 2 referral; and
  3. subject to the Mayor of London (or delegated authorised officer) advising that he is content to allow the Council to determine the case itself and does not wish to direct refusal, or to issue a direction under Article 7 that he does not wish to direct refusal, or to issue a direction under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application delegate authority to the Assistant Director Planning in consultation with the Director of Legal Services for the issue of the planning permission and subject to minor amendments to the conditions or the legal agreement. The Section 106 Agreement Heads of Terms would cover the following matters:

#### **Affordable Housing and Wheelchair Homes**

A minimum of 14 (56.25%) homes to be provided as affordable rented and 18 (43.75%) as intermediate housing;

Early Review Mechanism if not implemented within 2 years and a further late review mechanism to capture any uplift in profit, threshold of which to be negotiated.

### **Uplift in Contributions Secured through P0321.15**

TfL Cycle Provision at Hornchurch Station - £69 per additional dwelling

Hornchurch Country Park - £517.24 per additional dwelling

Public Open Space Access, Phasing and Management. All duly indexed.

### **Employment and Training**

The developer to submit to the Council for approval, prior to commencement of the development, a Training and Recruitment Plan. The developer to implement the agreed Plan;

The developer to use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development.

### **Transport and Highways**

Submission of Travel Plans covering the residential and commercial elements of the scheme. The full travel plan should include the first round of survey results for Phase 1 of the site and include car and cycle parking monitoring.

A travel plan bond of £10,000 will be required to be used by the Council to remedy any failure to comply with the terms of the approved travel plan.

Payment of a Travel Plan Monitoring Fee of £5,000 for the purposes of monitoring the operation and effectiveness of the travel plan

The developer to ensure the effective implementation, monitoring and management of the travel plan for the site

### **Carbon Offset**

Provision of actual carbon emissions and payment of any additional contribution if the on-site carbon reductions stated in the strategy are not achieved - carbon offsetting payment in accordance with Policy 5.2 of the London Plan: Contribution of £226,800 towards carbon reduction programmes within the Borough, duly Indexed

### **Decentralised Energy Networks**

In the event of any future district decentralised energy network becoming available, the developer to use all reasonable endeavours to agree terms pursuant to a connection between the site-wide CHP system and the decentralised energy network.

The developer to safeguard a route to be agreed with the Council to enable a connection to any future district decentralised energy network.

### **Legal Costs, Administration and Monitoring**

A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation and a further financial obligation (to be agreed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms.

4. Any other planning obligation(s) considered necessary by the Assistant Director Planning.
- 3.2 That the Assistant Director Planning is delegated authority to negotiate the legal agreement indicated above and that if not completed by the 31<sup>st</sup> January 2020 the Assistant Director of Planning is delegated authority to refuse planning permission or extend the timeframe to grant approval
- 3.3 That the Assistant Director Planning is delegated authority to issue the planning permission and impose conditions [and informatives] to secure the following matters:

#### **Conditions**

1. Time Limit
2. In Accordance With Approved Drawings
3. Material Samples
4. Landscaping
5. Secured by Design
6. Wheelchair Adaptable Dwellings
7. Window and Balcony Details
8. Hours of Operation (Commercial Units)
9. Restricted Use (Commercial Units)
10. Restricted D1 Use
11. Photovoltaic Panels
13. Boundary Treatments
15. Water Efficiency
16. Energy Statement Compliance
17. External Lighting Scheme
18. Noise Protection
19. Air Quality
20. Contaminated Land
21. Plant Noise (Residential Units)
22. Ventilation and Plant (Commercial Units)
23. Surface Water Drainage
24. Sustainable Drainage Systems (SUDs)
25. Maximum 105 litres of water per person per day
26. Car Parking Plan
27. Disabled Parking Plan
28. Electrical Charging Points

- 29. Vehicle Access Prior to Occupation
- 31. Cycle Storage
- 32. Green Travel Plan
- 33. Demolition, Construction Management and Logistics Plan
- 35. Construction Hours
- 36. Highway Works
- 37. Wheel Washing
- 38. Refuse and Recycling

### **Informatives**

- 1. Fee required for approval of details
- 2. Highway approval required
- 3. Secure by design
- 4. Street naming and numbering
- 5. Community Infrastructure Levy (CIL).
- 6. Planning obligations
- 7. NPPF positive and proactive.

### **RECOMMENDATION B**

- 3.4 That, if by 31<sup>st</sup> January 2020 the legal agreement has not been completed, the Assistant Director of Planning is delegated authority to refuse planning permission on the grounds that:

The proposed development, in the absence of a Legal Agreement to provide appropriate improvements, benefits and monitoring that directly relate to the development, would fail to adequately mitigate the impact of the development on the wider area and provide for necessary social, environmental and physical infrastructural improvements arising directly from the development, contrary to the National Planning Policy Framework (2018), policies 3.11, 3.13, 5.2, 6.3, 7.4, 7.5, 7.6, and 7.19 of The London Plan (2016), Havering's Core Strategy and Development Control Policies Development Plan Document (2008) policies CP1, CP10, CP15, CP17, DC6, DC7, DC2, DC33, DC49 and DC50; Residential Design Supplementary Planning Document (2010) and the Planning Obligations Supplementary Planning Document (2013).

## **4 SITE AND SURROUNDINGS**

- 4.1 The former St George's Hospital site, Hornchurch, is located within the Green Belt and is bound to the north by residential houses in Hacton Drive and to the west by Suttons Lane, with residential housing facing the site. To the east and south are open areas of Hornchurch Country Park and the River Ingrebourne, which are identified as Metropolitan and Borough Sites of Importance for Nature Conservation (SINC) respectively. 800m to the south of the site the Ingrebourne Valley is identified as a Site of Special Scientific Interest (SSSI).

- 4.2 There are two existing vehicular access points to the site, both from the west via Suttons Lane. The main access is broadly located in the centre of the western boundary with the second access point located towards the south-west corner.
- 4.3 The former St George's Hospital site currently comprises a complex of buildings, ranging in scale and appearance. The site is characterised by large red brick institutional blocks set within their own or shared landscape comprising of lawns, parking, hard standing roads and paths, and groups of trees. The blocks are predominantly two storey but with high ceilings and steeply pitched roofs and are typical of the inter war institutional style. The existing buildings are identified as Buildings of Local Heritage Interest but are not statutorily listed nor is the site located within a conservation area. Phase II, to which this application relates, comprises the western part of the wider site, as well as a small parcel in the southwest corner of the site which comprises the Suttons Building which will be retained and refurbished for use as a heritage centre. The application site measures approximately 2.75 hectares (ha).
- 4.4 The remainder of the former St George's Hospital site, situated immediately to the east of the site comprises the Phase 1 site, with permission for to a Reserved Matters application comprising 194 dwellings (Ref. P0940.18) currently under construction. The area to the immediate north and west of the site comprises residential neighbourhoods. Residential dwellings on the opposite side of Suttons Lane, which bounds the site to the west, face onto the site and properties fronting Hacton Drive to the north of the site back onto it.
- 4.5 Sutton Lane Major Local Centre is approximately 650m from the site while the Hornchurch Major District Centre is some 1,300m away. The site is located in Flood Plain Zone 1 and has a PTAL score between 0 – 3. An Area Tree Preservation Order protects all of the trees on the site.

## **5 PROPOSAL**

- 5.1 *Overview* - The description of the proposed development, as it has been advertised is as follows:
- 5.2 Demolition of existing buildings, conversion of the former St George's Hospital Administrative Building and the erection of new buildings to provide 162 residential units (class C3) including car parking, cycle parking, landscaping and associated infrastructure along with the refurbishment of The Suttons Building for use as a Heritage Centre (Class D1).
- 5.3 It should be noted that the redline application is the phase 2 of the extant hybrid planning application (ref. P0321.15) granted at appeal in July 2017.
- 5.4 The proposal is for redevelopment of this part of the former St. George's Hospital site. It would involve the retention and conversion of the former administrative block for residential accommodation demolition while the rest of the hospital buildings would be demolished and new buildings erected to create a combined total of 162 dwelling units with associated car parking and landscaping; the Suttons Building

with 120sq.m floor area is to be refurbished to be used as heritage centre for community use.

- 5.5 The proposed development would create five new and converted residential blocks and two sets of semi-detached houses. The new blocks would range in height from two to four storeys comprising 158 flats (one and two bed) and four 3 bedroom houses respectively.

#### **Semi-detached Houses**

- 5.6 The new 3 bedroom semi-detached houses would be located on either side (a pair each) of the main access into the site. This will involve demolition of the existing gate house building.

#### **Block B1 (formerly Admin Block)**

- 5.7 This block fronts Sutton Lane and is two-storey in height. The fabric of the building is to be retained and the interior refurbished to create a total of 8 units (7 x 1bed and 1 x 2bed flats), four units per floor.

#### **Block A1 (formerly Willows building)**

- 5.8 Block A1 would front Sutton Lane and would be two-storey in height with third floor accommodation in roof space. This block would form a 'U' shaped footprint, with front outrigger at each end and sited west of the application site.

- 5.9 This block would have a total of 30 units of one and two bed units and would be served by two cores with front, side and rear access.

- 5.10 The ground floor would also contain two cycle stores serving and a refuse store containing 8 Euro bins.

#### **Block A2**

- 5.11 This block is to the rear of Block A1 on the southwestern end of the site and would be 4 storeys in height with the middle element of the top storey being set back.

- 5.12 This block would have a total of 36 units of which 14 units would be affordable rented and 7 units would be in shared ownership (intermediate housing), ranging from 1 bed to 2 bed units and 15 private units of 1 and 2 bed units.

- 5.13 The block would be served by two core entrances with a secondary means of access from the private residential route through. The upper floors would be served by two lifts, which would be wheelchair compliant.

- 5.14 The ground floor of this building would also contain two refuse stores which would have capacity to hold 5 bins each also contain two cycle stores to serve this block.

#### **Block B2**

- 5.15 This block is located behind Block B1 and the smallest of the new build in terms of footprint. It would be four-storey in height with gabled roof feature.

- 5.16 This block would be served by a single core, accessed from the eastern elevation of the building fronting the inner road. A secondary access is proposed from the

private residential route, located to the west of the proposed block. The upper floors would be served by a single lift, which would be wheelchair compliant.

- 5.17 The ground floor of the building would also contain a refuse store, capable of storing 5 bins and cycle store for up to 36 bikes.
- 5.18 This block would contain a total of 18 units all in private tenure and would range from 1 to 2 bed units.

### **Block C1**

- 5.19 This block is located north of the application fronting Sutton Lane. It is identical to Block A1 in terms of footprint, internal layout, appearance, scale and bulk. It would also contain 30 units of one and two bed units.

### **Block C2**

- 5.20 This block is located on the northeaster corner of the application behind Block C1. It is identical to Block A2 in terms of footprint, internal layout, appearance, scale and bulk. It would also contain 36 units of one and two bed units in private ownership.

### **Refurbishment of Sutton Building**

- 5.21 This building is two-storey located in the southwest corner of the former hospital site. Its 120sq.m floorspace would be refurbished and converted into a heritage centre for local and community use. There are external alterations proposed.

### **Overall site**

- 5.22 With the exception of flats in the converted former Admin Block (Block B1), each unit would have access to a private balcony/ terrace, and access to three communal amenity areas located between the six residential blocks.
- 5.23 No new vehicle access point is proposed. The existing roads within the site are to be refigured and widen in some places with ramp to allow for street parking leading to the wider site.
- 5.24 An external cycle store of approximately 19m<sup>2</sup> is proposed to serve the occupants of Block B1. This will be located rear of the block along the communal amenity space.

## **6 PLANNING HISTORY**

- 6.1 The following planning decisions are relevant to the application:

- P0321.15 – The redevelopment of the St George's Hospital site inclusive of partial demolition and conversion of existing buildings to provide up to 290 dwellings, on 10.0 ha of the wider site, together with associated car parking, landscape and infrastructure works.

Decision: Refuses 07/01/2016 for the following reason:

1. Owing to the proposed built form of the development, the intensity of the proposal's layout, and the extent of development compared to the existing built development, it is considered that the proposal would have

a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. The proposal is considered to constitute inappropriate development in the Green Belt, and would also be harmful to the visual amenities of the Green Belt. Very special circumstances that overcome the harm to the Green Belt, by reason of inappropriateness and visual impact, have not been demonstrated in this case. The proposal is therefore considered to be contrary to the policy contained in the National Planning Policy Framework and Policy 3.17 of the London Plan.

2. The indicative internal layouts of the retained buildings demonstrate that four units would fail to achieve the minimum Nationally Described Space Standard for 1 bedroom flats and would as a result fail to provide a satisfactory amount of internal space for future occupants contrary to the intentions of Policy 3.5 of the London Plan.
3. In the absence of a legal agreement to secure an agreed level of affordable housing the proposal is considered to be contrary to Policy DC6 (Affordable Housing) of the Havering Core Strategy and Development Control Policies Development Plan Document.
4. In the absence of a legal agreement to secure contributions towards local infrastructure projects, namely education, sustainable transport/cycling improvements and mitigation of the impact of the development upon the County Park, necessary as a result of the impact of the development, the proposal is considered to be contrary to Policy DC72 of the Development Control Policies DPD.

The application was subsequently allowed at appeal by the Planning Inspectorate under reference APP/B5480/W/16/3153859 dated 13 July 2017.

- P0323.15 – The redevelopment of the St Georges Hospital site inclusive of partial demolition of existing buildings to provide up to 3,000 m<sup>2</sup> of new healthcare facilities, on 1.74 ha of the wider site, together with construction of a new vehicular access from Suttons Lane, associated car parking, landscape and infrastructure works.  
Decision: Awaiting Decision
- P0459.16 – The redevelopment of the St George's Hospital site, inclusive of partial demolition and conversion of existing buildings, to provide up to 279 dwellings, on 10.11 ha of the wider site, together with associated car parking, landscape and infrastructure works.  
Decision: Withdrawn Date: 24/04/2018.
- F0003.18 – Prior notification of proposed demolition for the buildings within Phase 1 of the redevelopment of the St George's Hospital site.  
Decision: Non-standard dec. 29/06/2018.
- P0940.18 – Approval of Reserved Matters (layout, scale, appearance and landscaping) for Phase 1 of the outline part of the redevelopment at St

George's Hospital (LPA Ref. P0321.15) comprising the construction of 194 dwellings, new public open space, car parking and associated infrastructure works, and details to satisfy Conditions 1, 8, 22, 23, 25 and 27 of permission ref. P0321.15.

Decision: Granted 06/12/2018

## 7 CONSULTATION RESPONSE

### 7.1 Statutory and Non Statutory Consultation

7.2 The following were consulted regarding the application:

- LBH Urban Design Officer
- LBH Conservation / Heritage Advisor
- LBH Street Management (Highways)
- LBH Education
- LBH Environment Health
- Natural England
- Transport for London (TfL)
- The Environment Agency
- Essex and Suffolk Water
- London Fire Brigade
- Thames Water
- EDF Energy (Network PLC)
- National Grid Cadent
- Designing Out Crime Officer
- NHS
- Essex Wildlife
- Historic England
- Royal Society for the Protection of Birds (RSPB)
- Greater London Authority (GLA)
- Essex County Council

7.3 A summary of the consultation responses received along with the Officer comments

**LBH Urban Design Officer:** No fundamental objection.

**LBH Conservation / Heritage Advisor:** It is my opinion that the proposed scheme, which would result in only two of the nineteen buildings on site being retained, would cause a high level of harm both to those assets being demolished as well as to the significance of those being retained, the setting of which makes an invaluable contribute to their significance. Further to this, I do not believe the proposed makes a positive contribution to local character and distinctiveness nor do I support the conclusions of the applicant that the buildings are not capable of conversion. In my opinion, there is not clear and convincing justification to query the conclusions of the Inspector with respect to the previous permission.

Loss of the existing building not acceptable

Whilst the significance of the site has been harmed by the implementation of the permission granted, the site remains an area of special architectural and historic interest the character and appearance of which it is desirable to preserve or enhance. This character is defined by the formal layout of the site, the shared materiality and architectural styling of the remaining blocks which extends to landscaping including the railings and external brick steps. As such, I request that were permission to be refused, the London Borough of Havering considers the appropriateness of designating the site as conservation area to safeguard the heritage values of the site. Early discussions with Historic England on this matter would be advisable.

Officer comment: All points raised are addressed under the relevant sections of the appraisal below.

**LBH Street Management (Highways)** – No objection to the proposal subject to condition and informatives.

Officer comment: Noted and appropriate condition and informatives suggested.

**LBH Education** – All Local Authorities including Havering have a statutory duty to ensure that there are enough school places available in the borough to accommodate all children who live in the borough and might require one. The increase in demand for school places has meant that in some areas of Havering the demand for places is higher than the number of places available. We have already consulted on and successfully implemented expansions at several schools in the borough through three phases of our Primary Expansion Programme. However, due to the sustained and increasing demand for school places, further permanent expansion of our schools and new schools proposals are required.

The development has been updated to include an accommodation therefore, the revised yield when the GLA Population Yield calculator which differentiates between unit size and tenure is applied, the development will generate the following number of pupils in each school phase:

- Early Years: 30
- Primary: 29
- Secondary: 6
- Post-16: 2

**LBH Environment Health** – A remediation strategy has already been approved for this development under the outline planning application. To prevent any risk posed by land contamination during demolition and construction works, I would recommend our standard ‘during development’ contaminated land condition.

Officer comment: Noted and appropriate condition and informatives suggested.

**LBH Street Management (Drainage)** – Flood Risk Assessment is acceptable. A condition requiring the submission of a drainage layout plan prior to commencement is recommended.

Officer comment: Noted and appropriate condition and informatives suggested.

**LBH Waste & Recycle Team** – Further clarity over waste storage is required for this development. The waste capacity for this site will be excessive; therefore alternative solutions should be explored, such as an underground solution.

Officer comment: All points raised are addressed under the relevant sections of the appraisal below

**Natural England:** No objection

**The Environment Agency** – No fundamental objection subject to condition.

Officer comment: Noted and appropriate condition and informatives suggested.

**London Fire Brigade** – I am satisfied with the proposals in relation to the Firefighting Access Arrangements as per ADB B5 Section 16: Vehicle Access. No additional new hydrants are required and no further action is required by our office. We are happy for the works to go ahead as planned.

**Thames Water** – (Waste) Thames Water has identified an inability of the existing combined water infrastructure to accommodate the needs of this development proposal. Thames Water request condition to be added to any planning permission

The drainage strategy does not provide sufficient detail on connection points for the foul and surface water or the proposed surface water flows. Could the developer please provide more information which will facilitate a more detailed assessment of the impact of this development on the public network.

Officer comment: Noted and appropriate condition and informatives suggested.

**National Grid Cadent** – There is apparatus in the vicinity of application site which may be affected by the activities specified. The applicant must ensure that proposed works do not infringe on Cadent's legal rights and any details of such restriction should be obtained from the landowner in the first instance.

**Designing Out Crime Officer** – No fundamental objection subject to conditions.

Officer comment: Noted and appropriate condition and informatives suggested.

**Historic England** – The application affects heritage asset of building archaeology interest and lies in an area where buried archaeological assets are also expected.

I recommend that the borough's Conservation advisers be consulted on the principle of demolition of the hospital, which would involve the near total loss of an important local heritage asset.

The LPA should challenge the applicants to provide public benefit from any loss, as a consented scheme with the current proposals would be highly regrettable on heritage grounds.

Should the LPA choose to grant consent of this application in its current form, some limited offset could be secured through pre-demolition conditions for archaeological investigation and historic buildings recording. A third condition for public outreach and site interpretation would also be needed. However, I emphasise that preservation rather than recording and destruction of heritage assets is favoured in both national and local policy.

Officer comment: All points raised are addressed under the relevant sections of the appraisal below.

**Greater London Authority (GLA)** – London Plan policies on principle (green belt), housing, urban design, sustainable development and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan:

- Principle: The scheme constitutes the limited infilling and redevelopment of an existing developed site and is therefore consistent with the exceptions to inappropriate development on green belt land which are outlined in paragraph 145 of the National Planning Policy Framework. The proposed development will contribute towards the delivery of new homes within the London Borough of Havering, and is supported in line with Policies 3.3 of the London Plan and H1 of the draft London Plan.
- Housing: The scheme proposes 13% affordable housing by habitable room which is below the public land threshold and is wholly unacceptable in the absence of a verified viability position. GLA officers are robustly scrutinising the viability appraisal to maximise the provision of affordable housing in accordance with the London and draft London Plan. Both early and late stage review mechanisms must be secured.
- Urban Design: The layout, scale, height and massing is commensurate with the previous masterplan and the existing buildings which is supported. The adaptive re-use of the a local heritage asset for community use as an interpretive heritage centre is strongly supported in accordance with Policies 7.8 of the London Plan and HC1 of the draft London Plan. The public benefits of the development would outweigh the harm caused by the demolition of some lower order non-designated heritage assets on the application site.
- Sustainable Development: Further revisions and information are required before the energy proposals can be considered acceptable and compliance with Policy 5.2 of the London Plan and Policy SI2 of the draft London Plan confirmed. The surface water drainage strategy does not comply with London Plan policy 5.13 and policy SI.13 of the draft London Plan. No water consumption data has been provided to meet the requirements of London Plan policy 5.15 and Policy SI.5 of the draft London Plan. The applicant must embed urban greening as a fundamental element of site and building design in line with Policy 5.10 of the London Plan and Policies G1 and G5 of the draft London Plan.
- Transport: The transport assessment complies with Policies T1 and T2 of the draft London Plan. Car parking should be reduced in line with Policy T6 and Table 10.4

of the draft London Plan. Cycle parking, Delivery, Servicing, Construction Logistics and Travel Plans must be secured by conditions and s106 agreement.

**Essex County Council** – No comment received.

**EDF Energy (Network PLC)** – No comment received.

**NHS** – No comment received.

**Essex Wildlife** – No comment received.

**Royal Society for the Protection of Birds (RSPB)** – No comment received

**Essex and Suffolk Water** – No comment received.

## **8 COMMUNITY ENGAGEMENT**

- 8.1 In accordance with planning legislation, the developer has consulted the local community on these proposals as part of the pre-application process.

## **9 LOCAL REPRESENTATION**

- 9.1 The application was advertised via a Press Notice and Site Notice displayed at the site for 21 days.
- 9.2 A total of 184 consultation letters were sent to neighbouring properties regarding this application.
- 9.3 Two representations (one objection and a petition in support with 42 signatures) have been received.

### **Representations**

- 9.4 The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the next section of this report:

#### Objections

- The proposal will cause excessive amount of traffic and add further problems with parking;
- Raise noise level naturally through added vehicles in what is a quiet area with further disruption to the wild life in the vicinity;
- Will have impact on school places for infant, juniors and secondary in the area.

#### Supporting comments (petition with 42 signatures)

- Retain the central admin building and Suttons;
- New community space for Hornchurch Aerodrome Society;
- Public open spaces;
- Additional contributions for local facilities.

Officer comment: The issues raised are addressed in the context of the report.

## **10 MATERIAL PLANNING CONSIDERATIONS**

10.1 The main planning issues raised by the application that the committee must consider are:

- Principle of Development
- Affordable Housing
- Housing Density and Unit Mix
- Design, Character and Appearance of the Area/Heritage Assets
- Residential Amenity
- Traffic, Safety and Parking
- Flood Risk and Development
- Accessibility
- Sustainability
- Air Quality
- Environmental Impact Assessment
- Statement of Community Involvement
- Archaeology
- Ecology and Biodiversity
- Planning Obligations

### **10.2 Principle of Development**

10.2.1 LDF Policy DC46 is specific to the application site, identifying the St. George's Hospital site as a Major Developed Site in the Green Belt where Green Belt assessment criteria should be used and where "in the event of complete or partial redevelopment the Council will seek proposals for residential or community use, subject to relevant policies in the Plan." The concept of designated major development sites promoted by PPG2 (Green Belts) has been removed by the NPPF. However, para 145 of the NPPF identifies that one of the exceptions to the general presumption against inappropriate development in the Green Belt is in relation to "partial or complete redevelopment of previously developed sites....which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development." LDF Policy DC46 can therefore be upheld as remaining in line with National Policy on the Green Belt.

10.2.2 Policies DC26 of the LDF relates to the provision of new community facilities setting a number of criteria (accessibility, impact upon character and amenity, parking availability and highway impact and flexibility of the building) which need to be satisfied before planning permission should be granted.

### Loss of Hospital Buildings

- 10.2.3 The principle of redevelopment of the former hospital site has already been established through the granted of planning permission under ref: P0321.15 allowed at appeal under reference APP/B5480/W/16/3153859 dated 13 July 2017, which allowed the partial demolition and conversion of existing buildings to provide up to 290 dwellings, on 10.0 ha of the wider site, together with associated car parking, landscape and infrastructure works. Phase 1 of the approved hybrid scheme (now under construction) involved demolition of some hospital buildings, while Phase 2 involved conversion of six blocks into flats. The current application covers Phase 2 of the allowed scheme involving demolition of five of the six buildings shown to be retained to provide 162 residential apartments an uplift of 66 additional units from the hybrid scheme.

### Green Belt

- 10.2.4 The application site is located within the Metropolitan Green Belt where great importance is attached at local, regional and national level to the original aims of preventing urban sprawl by keeping land permanently open and protecting the essential characteristics of openness and permanence.
- 10.2.5 Paragraph 143 of the National Planning Policy Framework (the NPPF) states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The NPPF indicates at paragraph 145 that the construction of new buildings should be regarded as inappropriate in the Green Belt unless they fall within certain specified exceptions including *“limited infilling or the partial or complete redevelopment of previously developed land, whether in redundant or continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development”*. Whilst this exception is not reflected in the adopted Local Plan, it represents up to date Government policy and is therefore a material consideration that carries substantial weight.
- 10.2.6 However, as set out above, the partial or complete redevelopment of previously developed sites could be considered appropriate development in the Green Belt if it would not have a greater impact upon the openness of the Green Belt and does not undermine the purpose of the site’s inclusion in the Green Belt. On the other hand, if it were to be concluded that the proposals would have a greater impact on openness or result in some other harm to the purpose of including the site in the Green Belt, then very special circumstances would have to be demonstrated which clearly outweighed such harm. The impact upon the openness of the site, implicitly intertwined with the visual impact of the proposals, is therefore a key consideration to determining the acceptability of the proposals in Green Belt terms.
- 10.2.7 The applicant has undertaken an assessment of the impact of the development on openness based upon the built form within the Green Belt – the quantum (footprint and volume) and spread of development (development envelope), comparing the development proposals against the existing hospital layout, its buildings and hard surfaces. The layout approach with parameter plans defining matters such as development envelopes, building heights, retained buildings, open space and movement is considered to lend itself to analysis of this nature. However, members should be aware that there is no definition of “openness” contained within the NPPF

nor are there any criteria within policy or guidance relating to the assessment of a development upon it. A degree of subjective judgement therefore remains however well quantified the comparisons are.

- 10.2.8 It is apparent, however, that two conditions must be met in order for development to meet the specified exception. Proposals must not *“have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development or not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority”*. These tests are considered below.

#### Impact on Openness

- 10.2.9 It is necessary to consider whether the proposed development would have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Paragraph 133 of the NPPF highlights *“the essential characteristics of Green Belts are their openness and their permanence”*. There is no definition of openness in the NPPF but, in the context of the Green Belt, it is generally held to refer to freedom from, or the absence of, development. Any above ground development would to some extent diminish the openness of the Green Belt.

- 10.2.10 The application site is characterised predominantly by large institutional style buildings with extensive areas of hard surface, set within a generally grassed and landscaped setting. The redevelopment proposals are contained wholly within the site boundaries i.e. Phase 2 and do not propose any significant material spread of development beyond the existing development envelope. There are some marginal relocations of development, but overall by removing and greening areas of existing hard surface, the edge of the developed site would be softened. This is consistent with the Green Belt objective of checking the unrestricted sprawl of the built up area.

- 10.2.11 The current buildings on the site are in the main of two-storey with relatively high pitched roof. However, as is often found with inter war institutional buildings, many of the existing two storey healthcare buildings have eaves and ridge heights which are equivalent to modern 3-4 storey residential dwellings. The proposed development would introduce buildings between two and four storeys in height. It is acknowledged however, that openness goes beyond physical presence and that the visual sense openness is a qualitative judgement pertaining to the whole, including disposition of buildings, footprint, height, bulk, mass, roofscape, landscape and topography.

#### Quantitative

- 10.2.12 Supporting documents show that the footprint of the proposed Phase 1 and 2 schemes would result in a reduction of footprint of approximately 633m<sup>2</sup> across the wider site. Though this is not significant as the reduction in footprint in the approved Hybrid scheme, it is however considered will assist in ensuring there is no greater impact on the openness of the Green Belt.

- 10.2.13 In terms of the overall floorspace and volume across the site, both (Phase 1 and 2) will increase in comparison to the existing and the Hybrid scheme. However, taking

into account the layout of the two phases, there will be a more efficient, rationale and condensed form of development than the existing buildings; this combined with the reduced footprint, create a more open and visually permeable layout which reduces the impact on the openness of this Green Belt site.

#### Qualitative

- 10.2.14 The hybrid planning permission allowed for the buildings up to three-storeys across majority of the site, with elements of four storeys in some location. The Phase 1 scheme being implemented now has two storey houses on the eastern boundary shown in the hybrid scheme for three storey block of flats. The proposals (Phase 1 and 2) do not incorporate the wings on the existing buildings which create a visually permeable layout with large open courtyards between the blocks, which together with the reduced height of Phase 1, will mitigate the visual impact of the development on the Green Belt.

#### Conclusion

- 10.2.15 Based on the forgoing, it is considered that the proposals will not have undue impact on the openness of the Green Belt over and above the existing built form, and as such not an inappropriate development in the Green Belt in accordance with Green Belt policy of the NPPF.
- 10.2.16 Having regard to the fact that there is no presumption against the loss of these former hospital building, the re-provision of some form of community use (Sutton Building) and taking into consideration that the site is regarded as previously developed land, the proposed residential led redevelopment of the site is considered to be acceptable within this Green Belt site. On this basis, the proposal is considered to be acceptable in principle with regard to the above policies. Further, there is strong support for the scheme from the GLA.
- 10.2.17 Notwithstanding the acceptability of the principle, the proposal would be subject to all other material planning considerations, in particular, harm that will be caused to the character of this former military hospital site and its locality as a result of the demolition of four (heritage assets) locality listed buildings in addition to those already demolished in Phase 1, which are explored further in the report below.

### 10.3 **Affordable Housing**

- 10.3.1 Policy DC6 of the LDF states that the Council will aim to achieve 50% of all new homes as affordable and will seek a tenure split of 70:30 between social housing and intermediate forms. Policy 3.11A of The London Plan sets out that of the 60% of the affordable housing should be for social and affordable rented accommodation and 40% for intermediate rent or sale of the overall affordable housing provision on any given development site. Policy 3.11B sets out that individual borough should set out in their LDF the amount of affordable housing provision needed. Policy H7 of the draft London Plan as at least 30% low cost rent (social rent or affordable rent), at least 30% intermediate (London Living Rent or shared ownership) and the remaining 40% as determined by the local planning authority.

10.3.2 Supplemental to the above policies the Mayor has produced Homes for Londoners – Affordable Housing and Viability SPG which aims to provide guidance on ways to speed up planning decisions and increase the amount of affordable housing delivered through the planning system. The SPG sets out the different threshold approach to viability appraisals. The first of which is the ‘fast track route’ (Route B) in which if the scheme delivers 35% of affordable housing, does so without any public subsidy and meets the specified tenure mix and other requirements and obligations, are not required to submit viability information. Schemes which do not meet the 35% threshold or require public subsidy, will be required to submit detailed viability information (Route A). The 35% of a scheme as affordable housing is based on habitable rooms. Under both Routes an early review mechanism will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted. A further late (near end of development) review would also apply in the case of proposals coming forward under Route A, which is applied once 75% of units are sold. Where a surplus profit is identified this should be split 60/40 between the LPA and developer and should be in the form of contributions towards off site affordable housing provision. This would need to be secured legally through the section 106 agreement, which should also set out an agreed Benchmark Land Value that would form the basis for a comparison should an early review be triggered.

Appraisal

10.3.3 The applicant has submitted a financial viability appraisal for the development site, which is based on the provision of 35% affordable housing of the overall uplift of 66 additional housing units to the 290 units permitted under the Hybrid scheme, based on 60 habitable rooms (32% in terms of unit numbers). This is broken down as 13 affordable rent units and 5 shared ownership units.

10.3.4 The viability submitted for the 35% affordable housing scheme shows that based on the assumptions made in terms of the gross development value and the cost of the development, the residual land value when taking into consideration the benchmark value of the existing land would generate a deficit of just under £100m. The Council tendered an external review of this viability, which after adjusting some of the assumptions made (including an increase in the capitalised ground rent, including a 6% profit on affordable housing, adjustment to the project programme timeline and the reduction in site value) and increasing the average sales value achieved per square metre to reflect the market conditions at the time of this review, still generated a deficit in excess of circa £350,000.00.

10.3.5 The viability assessments on behalf of the applicant and review on behalf of the Council both conclude that the scheme before the Council is unable to deliver more than 35% affordable housing (units) on this scheme and 18% for the two phases. While the tenure split is not in accordance with Council policy, external review demonstrates that the proposed tenure split is the maximum reasonable level that can be delivered on this site. Officers would also point out that the developer is also providing a community hall on the site for use as museum at their own cost.

10.3.6 Whilst the overall percentage of affordable housing would not be policy compliant, it is considered that as the scheme would not fall under Route B of the Mayors SPG, an early and late review mechanism would be required in this instance, as per the

requirements of the Mayors Affordable Housing and Viability SPG. However, GLA has raised objection to the level of affordable housing provision in the Stage 1 response as being inadequate; that would fall significantly below the 50% affordable housing threshold outlined in Policy H6 of the draft London Plan, and in the absence of a verified viability position is wholly unacceptable. However, whilst 35% has been shown to be the viability position, the applicant has agreed to provide 50% of the uplift as affordable in relation to satisfying the heritage concerns.

#### *Conclusion*

- 10.3.7 Officers acknowledge that GLA is not in support of the level of affordable housing provision at this stage however, officers are satisfied that when considered as a whole, and in the context of the schemes viability and NPPF guidance, which seeks to ensure schemes deliver the maximum reasonable amount of affordable housing yet remain deliverable, the subject application would accord with key policy objectives in relation to affordable housing provision. Furthermore, the total of affordable at 50% of the uplift would be secured by a section 106 agreement.
- 10.3.8 Based on the above factors, it is considered that the development would accord with relevant national, London and local policies and the Mayor's SPG..

#### 10.4 **Housing Density and Unit Mix**

- 10.4.1 London Plan policy 3.8 require new development to provide a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups. London Plan policy 3.4 sets out a range of densities for new residential development.

#### Density

- 10.4.2 The site is considered to be within a suburban Location and moderate Public Transport Accessibility Level (PTAL) of 1-3.
- 10.4.3 The London Plan sets out at Table 3.2 appropriate densities for various different areas. Table 3.2 sets out that a density of 50-95 units per hectare and 50-95 habitable rooms per hectare would be most appropriate for this site. The development proposes a density of 58 u/ha and 160 hr/ha, which is over the levels set out in The London Plan 2016. However, as noted above, the matrix is only the starting point for considering the density of development proposals provided that the development will not have an adverse impact on the character of the surrounding area and satisfy the design policies of the Plan. This is also supported in Policy D6 C of the draft London Plan which sets density of up to 240 units per hectare in areas of PTAL 2 to 3. To this end the Draft London Plan has deleted density as a means of assessing these forms of housing developments. Instead favouring an approach which requires development to make the most efficient use of land and be developed at the optimum density based on a design-led approach that determines site capacity.
- 10.4.4 Notwithstanding the increase in size and the ensuing density of 69 dwellings per hectare, it is considered that the level of open space around the built form is commensurate to the level of accommodation and size of the land in the context of its location (taking into account the overall development for the two phases) which

is close to public transport facilities and character of the area, and as such is not considered to be an overdevelopment of the site nor result in a detrimental effect on the character of the area. The proposal would comply with the other material considerations and these are discussed further in the report below.

Unit Mix

- 10.4.5 The NPPF (2018) seeks to steer development to deliver a wider choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Policy 3.8 of the London Plan encourages new developments offer in a range of housing mix choices. The above policy stance is to allow Londoners a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.
- 10.4.6 Policy DC2 sets out an indicative mix for market housing of 24% 1 bedroom units, 41% 2 bedroom units, and 34% 3 bedroom units. DC6 states that in determining the mix of affordable housing, regard should be paid to the latest Housing Needs Survey. The Council’s Housing Strategy (2014) which was informed by an extensive Housing Needs and Demands Assessment (2012) suggested that 75% of the rented provision should be one or two bedroom accommodation and 25% three or four bedrooms and for intermediate options, a recommended split of 40:40:20 for one, two and three bedroom accommodation.
- 10.4.7 The development would largely provide one-bed and two-bed units, with a small proportion of three-bed units as set out in the table below:

Unit Type	Private Units	Affordable Units	Total Units
Studio	6	0	6 (3.7%)
1 bed	39	8	47 (29%)
2 bed 3 person	26	6	32 (19.7%)
2 bed 4 person	55	18	73 (45.1%)
3 bed	4	0	4 (2.5%)
Total	130	32	

- 10.4.8 The supporting text to London Plan Policy 3.4 notes that “*While there is usually scope to provide a mix of dwelling types in different locations, higher density provision for smaller households should be focused on areas with good public transport accessibility (measured by Public Transport Accessibility Levels [PTALs]), and lower density development is generally most appropriate for family housing.*” While majority of the units proposed are one and two bed, the proposal should be considered in the context of the developments for the two phases where a reasonable amount of family dwellings are provided in Phase 1, which on balance, provides the required mix in this location. One bed and two bed units will be suitable for first time buyers and couples. The two bed 4person units are also suitable for young families as recognised in the draft London Plan. As such, it is considered that the units would be appropriate and would accord with development plan policies.

10.5 **Design, Character and Appearance of the Area/Heritage Assets**  
Policy Context

- 10.5.1 The NPPF 2018 attaches great importance to the design of the built environment. Paragraph 124 states *'The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'*
- 10.5.2 Policies 7.4 and 7.6 of the London Plan require that buildings, streets and open spaces should provide a high quality design response that has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass.
- 10.5.3 Policy DC61 of the Core Strategy and Development Control Policies Development Plan Document states that planning permission will only be granted for development which maintains, enhances or improves the character and appearance of the local area.
- 10.5.4 The NPPF describes the setting of heritage assets (page 67) as 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)'.
- 10.5.5 Paragraph 197 of the NPPF states: 'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.
- 10.5.6 Policy 7.8 of the London Plan recognises the importance of heritage assets and requires that development affecting such assets and their settings should conserve their significance by being sympathetic to their form, scale, materials and architectural detail.
- 10.5.7 Policy DC67 provides guidance on dealing with applications which impact upon Listed Buildings and other buildings of heritage interest and states that account will be taken of their contribution to heritage.

#### Area Context

- 10.5.8 The remainder of the former St. Georges Hospital site, situated immediately to the east of the site comprises the Phase 1 site for the development of 194 dwellings of varying heights, currently under construction. The area to the immediate north and west of the site comprises residential neighbourhoods. To the west (opposite) of the site are residential bungalows fronting Suttons Lane.
- 10.5.9 The areas to the east of the wider former hospital site and south of the application site comprise open space. The Ingrebourne River Valley, identified as a Metropolitan Site of Importance for Nature Conservation (SINC), is adjacent to the site to the east; beyond lies agricultural fields. To the south of the site is Ingrebourne Valley Nature Reserve and Hornchurch Country Park, identified as a

Borough Site of Importance for Nature Conservation. 800m to the south of the site, the Ingrebourne Valley is identified as a site of Specific Scientific Interest (SSSI).

- 10.5.10 The proposed replacement would be formed of five blocks, two fronting Suttons Lane and two-storey in height with accommodation in roofspace (blocks A1 and C1). The proposed blocks A1 and C1 would be situated to the south and north the flanks of the former Administrative building (block B1) respectively. The remaining three blocks, blocks A2, B2 and C2 would be to the rear of blocks A1, B1 and C1 and four-storey in height. There would be an open space provided to the rear of blocks A1, B1 and C1 and internal access road on the inside. The proposed blocks A1 and C1 would be of similar height as the existing block and block B1 being retained and as such, the impact would be similar with the bulk and scale of the blocks to be demolished. While blocks A2, B2 and C2 would be a bit taller than the other three blocks, their impact and appearance in the street scene is tempered by the bulk and scale of the two-storey blocks to the front and the ground level being approximately 1m lower to the street level.
- 10.5.11 However, the Council's Conservation Advisor has raised concerns over the loss of the locally listed buildings and the harm it would cause to the special architectural, historic interest, character and appearance of which it is desirable to preserve or enhance. As such, clear and convincing justification would be required for any harm and public benefits need to be weighed up against the harm in accordance NPPF paragraphs 196 and 197. There would be public benefits as outlined by the supporting documents provided with this application including the provision of the Sutton Building. These need to be carefully weighed up against the harm as outlined above.
- 10.5.12 In balancing the public benefit of this proposal, this is considered to be threefold. Firstly the benefit of delivering much needed affordable housing is considered to be a public benefit. The scheme as discussed above, would despite a deficit, deliver 50% affordable housing, which Officers consider a significant public benefit, in light of the fact that a number of schemes recently approved having not achieved the minimum 35% required by the London Plan due to site viability. Secondly, the increased public access to the site, albeit to a lesser extent is also considered to be of some public benefit. It is considered that the delivery of significant affordable housing on this site, the design of the proposed buildings reflective of the existing and the retention of the former Admin Block, on balance outweighs the harm on the loss of the heritage assets. Thirdly, the scheme would provide community facilities by refurbishing Suttons Building for use as a Heritage Centre. Officers also consider that the views of the Ingrebourne River Valley (Site of Importance for Nature Conservation) through the site on this prominent location in the street would not be significantly harmed to the extent to set aside the clear public benefit of this development. In light of this justified public benefit, the proposal would give to no conflict with the guidance set out in the above policies.

Scale

- 10.5.13 The scheme before the Council has been developed through detailed pre-application discussions held with Officers and members of the Strategic Planning Committee.

- 10.5.14 This application seeks full planning permission for the demolition of the existing buildings and erection of two pairs of two-storey semi-detached houses, two two-storey identical blocks of flats with accommodation in roof slope and three four-storey blocks of flats.
- 10.5.15 In terms of scale, massing and height, the proposed building heights and massing have been designed to be in keeping with that of the existing buildings, the retained Administrative Building onsite, the Phase 1 scheme currently under construction and the surrounding area.
- 10.5.16 It should be noted that the hybrid planning permission comprised apartment building of varying scale across the site, rising to a maximum four storeys. The existing buildings onsite have a maximum height of approximately 11.25m. The height of the proposed buildings would range between approximately 12.47m to 14.81m. The proposal would have buildings across the site step up in height from the new two-storey gatehouses fronting onto Suttons Lane, two and half storey buildings fronting Suttons Lane sited on either side of the Administrative Building, which extend to three storeys at the rear. The three residential blocks at the east of the site, located furthest from Sutton Lane would 4 storeys in height and approximately 14.81m high.
- 10.5.17 The taller buildings are set utilising the topography of the site, which slopes approximately half a storey towards the rear of the site and along Suttons Lane i.e. north to south; this, together with the shroud of existing mature trees further mitigates the visual impact of the proposal in the streetscene and the immediate surrounding. Whilst the proposal would increase the scale and density of development within the application site compared to the extant hybrid scheme, given the size of the plot and the space that would be retained around the building, the proposal would not result in overdevelopment of the site. The submitted plans and supporting documents indicate a relatively spacious development that ensures adequate levels of sunlight and daylight to residential units.
- 10.5.18 When seen in context of the buildings approved for Phase 1 currently under construction and taking into account that the building heights range from two to four storeys in height, with traditional hipped roofs in most cases, the scale of the buildings would sit comfortably within the context and scale of the existing pattern of development. The scale of the buildings would also address the changes in levels coming down the hill east of the wider site.

#### Layout

- 10.5.19 The layout of the development has been designed to respond to the Administrative Building to be retained and the existing footprint of buildings to be demolished. The layout comprises three development parcels, separated by internal streets and green spaces which form communal courtyard spaces. There will be open landscaped courtyard spaces towards the rear of the site between the front and rear buildings creating a more open and visually permeable layout than currently exists on the site. The layout also responds to the existing internal road network within the site which provides vehicular access across the wider site. By providing a central private access route across, the site has provided the opportunity for a more meaningful private amenity space for the future occupiers and public access to the public open spaces.

### Design and Appearance

- 10.5.20 In terms of the appearance of the development, the proposal seeks to use a high quality brick finish to the building throughout. The proposed window reveals, external and recessed balconies would provide articulation to the façade of the building, helping the building to achieve its own identity in an area which is characterised by a varied pattern of development. The use of simple recessed modelling to the façade would add further articulation to the building's appearance and help delineate each of the apartments.
- 10.5.21 The proposed buildings have been designed to achieve an architectural cohesion with the retained Administration Building as well as the emerging development within Phase 1. The appearance would be traditional yet modern and the palette of materials (which would be secured by condition) would seek to complement the existing and nearby buildings, but at the same time establish their own character in the suburban environment. The palette of external materials would be controlled by way of an appropriate condition. Overall, it is considered that the traditional yet modern design and appearance of the development would make a positive contribution to the wider suburban environment.

### Landscaping and the Public Realm

- 10.5.22 Policy DC61 requires that new development must harness the topographical and ecological character of the site, including the retention of existing trees and landscape.
- 10.5.23 Policy DC21 requires major new residential development to include provision for adequate open space, recreation and leisure facilities.
- 10.5.24 Policy DC20 sets standards for the provision of public open space and children's play space which is also covered by Policy 3.6 of the London Plan supplemented by the Mayor's "Shaping Neighbourhoods: Play and Recreation SPG (2012).
- 10.5.25 The proposal is supported with an indicative landscape plan for the site. The scheme before the LPA has been subject to a number of pre-applications discussions and revisions prior to the agreement in principle over the final approach.
- 10.5.26 While the site has been divided into two phases, Phase 2 is a continuation of the landscape strategy developed for Phase 1. The landscaping proposals form a key part of the proposed layout of the development and also respond to the existing layout of the site through the creation of green corridor which runs east-east, continuing the open space established by the existing buildings.
- 10.5.27 The proposed development illustrates 'buildings within the landscape' comprising existing mature and new enhance planting. A broadly linear park is proposed as a feature along the western part of the site enhancing the setting for the retained/refurbished and rebuilt buildings facing onto Suttons Lane. Aspects such as the removal of the existing boundary railings and fences will serve to open up views and public access to the site which will make a notable positive impact on the

visual openness of the site. This will be of particular note along the frontage of the site where a 15m wide linear park would be created.

- 10.5.28 The communal gardens located within the centre of the site would provide private gardens for the residents of the development. This area would be enclosed by the buildings on the site and would have a private pedestrian route between on the street parking bays and internal roads. The main planting area around the perimeter of the buildings would in form of raised planters which would serve as dual purpose in creating a soft/ green landscaped corridor with low level shrub planting and to also provide a defensible area between the proposed public realm and the ground floor units. Ground level planting is proposed along the building envelopes. The main central area would be laid to lawn to provide informal play area and would include some play elements.
- 10.5.29 The layout arrangement of buildings will provide views in all directions of both public and private significant landscape features included across the site and beyond into the open green, buffer land, swales, courtyard and trees/planting. Wide landscape corridors will create separation between the two phases providing high quality public open space including children's play space.
- 10.5.30 Much emphasis has been placed upon the retention of existing trees and vegetation. An Arboricultural Impact Assessment accompanied the application which identified and classified every tree on the site according to its health and amenity value. The site contains 141 existing trees and the masterplan layout seeks to retain 95 of these. It is proposed that the loss of 46 trees overall, 30 of which are classified as being in poor health, would be balanced by the planting of 100 new trees throughout the wider site. It is proposed to remove a total of 32 trees within this phase of the development. The trees on the site have been made the subject of an Area Tree Preservation Order and officers are satisfied that the approach to tree retention and planting is acceptable and can be properly controlled through the use of appropriate conditions. The Council's Landscaping Architect has not raised no objection to the proposal subject to condition.
- 10.5.31 The landscaping proposals have been extensively reviewed by officers, who supports the proposals subject condition(s) being imposed.
- 10.5.32 The strategy for play space has been developed in line with the Mayor's "Shaping Neighbourhoods: Play and Recreation" SPG (2012) and indicates the provision of one Local Equipped Area of Play (LEAP), 3 no. Local Areas of Play (LAP), 5 no. Door Step LAPs and a Youth Space. Together with enhanced links to the adjacent Hornchurch Country Park plus private and communal garden areas officers are satisfied that the requirement has been adequately addressed.

Refuse (waste management)

- 10.5.33 Policy DC40 *Waste Recycling* large residential should provide on-site or convenient and accessible off-site communal recycling facilities. The proposed floor plans show that the following provision would be made in terms of refuse storage for the development:

- Block A1– 8 bins to serve the 30 flats contained within this block, located in two separate refuse storage areas.
- Block A2 – 10 bins to serve the 36 flats within this block located in two separate refuse storage areas.
- Block B1 –3 bins to serve the 8 units within this block, located within a single refuse storage area.
- Block B2– 5 bins to serve the 18 flats contained within this block, located in a single refuse storage area.
- Block C1 – 8 bins to serve the 30 flats within this block located in two separate refuse storage areas.
- Block C2 – a total of 10 bins to serve the 36 units within this block, located within two separate refuse storage areas.

10.5.34 According to the Council's 'Waste Management Practice Planning Guidance for Architects and Developers', this type of development would incorporate a minimum storage capacity of 45 litres for recycling and 180 litres for general refuse (rubbish) per dwelling. An 1100 litre bin would be required for recyclable waste and an 1100 litre metal / plastic bin would be required for residual waste for every twenty-four flats and eight flats respectively. Based on this Code of Practice, the development would require the following amount of bins to serve the size of development being proposed:

- Block A1 – 2 x 1100 litre bins and 5 x 1100 litre bins = 7 bins in total.
- Block A2 – 2 x 1100 litre bins and 6 x 1100 litre bins = 8 bins in total
- Block B1 – 1 x 1100 litre bins and 2 x 1100 litre bins = 3 bins in total.
- Block B2 – 1 x 1100 litre bins and 3 x 1100 litre bins = 4 bins in total.
- Block C1 – 2 x 1100 litre bins and 5 x 1100 litre bins = 7 bins in total
- Block C2 – 2 x 1100 litre bins and 6 x 1100 litre bins = 8 bins in total

10.5.35 With the exception of Block B1, Blocks A1, C1 and B2 would see an over provision by one bins while Blocks A2 and C2 would see an over provision by two bins.

10.5.36 According the submitted Planning Statement, the bin requirements have been double to account for fortnightly collections. Residents' carry distances are up to a maximum of 30m horizontally to refuse and recycling stores and the drag distance within the 25m maximum required from refuse storage to refuse vehicle collection in compliance with Council standards.

10.5.37 In terms of layout and appearance of the refuse stores, these appear to broadly work. The blocks of apartments have integrated refuse stores at ground floor level. Therefore the refuse stores would have adequate capacity to store the size of bins needed. Notwithstanding, the Council's Waste & Recycle Team has advised that waste management for the development will be excessive and that underground solution should be explored. It is however considered that this concern can be adequately dealt with by condition. As such, subject to the imposition of the applicable condition, it is considered that the location and provision of refuse stores would be compliant with the above stated policies.

### Solar Panels

- 10.5.38 The applicant is proposing to install solar panels onto all flat roof area across the site. These are unlikely to be perceptible at street level as such panels would be set in from the roof edges. While the submitted roof layout and elevation plans do not show the solar panels, it is considered that the proposed solar panels would not have adverse impact upon the character of the area or the appearance of the completed development taking to account the height and setting of the proposed building.

### Conclusion

- 10.5.39 In conclusion, the proposed development would provide a high quality development on the site which would appropriately address the public realm. The layout, scale, height and massing is commensurate with the previous masterplan and the existing buildings. The adaptive re-use of a local heritage asset for community use as an interpretive heritage centre is strongly supported in accordance with Policies 7.8 of the London Plan and HC1 of the draft London Plan. The public benefits of the development would outweigh the harm caused by the demolition of some lower order non-designated heritage assets on the application site. It is considered that the development proposal would be appropriate and would accord with the NPPF, policies 7.4.B and 7.6.B of the London Plan 2016, policies DC61 and DC 67 of the Havering Core Strategy and Development Control Policies Development Plan 20018.

## 10.6 **Residential Amenity**

### Residential Amenity for Future Occupiers

- 10.6.1 Policy 3.5C of The London Plan requires all new residential development to provide, amongst other things, accommodation which is adequate to meet people's needs. In this regard, minimum gross internal areas (GIA) are required for different types of accommodation, and new residential accommodation should have a layout that provides a functional space. Table 3.3 of The London Plan specifies minimum GIAs for residential units and advises that these minimum sizes should be exceeded where possible. The policy also provides a commitment that the Mayor will issue guidance on implementation of the policy, and this commitment is fulfilled by the publication of the Mayor's Housing SPG (2016). The SPG sets out detailed guidance on a range of matters relating to residential quality, incorporating the Secured by Design principles, and these form the basis for the assessment below.

### Communal and Public Open Space

- 10.6.2 The proposal includes three private communal spaces (central courtyard gardens) for the residents of the development which would be afforded natural surveillance by the surrounding development, accessible for disabled people and wheelchair users. Both spaces are orientated in a way to optimise direct sunlight given the constraints of the site. Management of these spaces can be controlled by condition, through a landscape maintenance and management plan.
- 10.6.3 The proposed Masterplan for Phase 2 provides 0.6747 ha of Open Space. The public open space would be in linear park form located to the south boundary and would offer controlled public access to the Village Green set within Phase 1. There

is also a central linear park creating east west connection through the neighbourhood. The route through would be accessible for all users.

- 10.6.4 Overall it is considered that the different forms of communal space being offered would be a benefit of the scheme and improving the environment of these properties. The space would benefit from high levels of natural surveillance and would be of dimensions/configuration that would lend itself to domestic recreational activities.

#### Play Space

- 10.6.5 Policy 3.6 on 'Children and Young People's Play and Informal Recreation Facilities' from the '*London Plan*' 2016 expresses that the Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well designed, secure and stimulating play and informal recreation provision. In terms of local plan policies, Policy DC3 on 'Housing Design and Layout' of LBH's '*Development Plan Document*' 2008 expresses that planning permission will only be granted if, in their design and access statements, developers demonstrate how they have addressed the policies in this plan which impact on the design and layout of new developments.
- 10.6.6 Based on the expected child population generated by the scheme and an assessment of future needs. Using the methodology within the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG, it is anticipated that there will be approximately 22 children within this phase of development based on current housing mix. The guidance sets a benchmark of 10sq.m of useable child playspace to be provided per child, with under-5 year olds playspace provided on-site as a minimum. As such, a minimum of 220sq.m playspace is required within the application site boundaries.
- 10.6.7 The applicant has provided a landscape design and access statement which identifies a total of 1,194sq.m of children's playspace across all phases. However, no phase-by-phase breakdown of playspace areas has been provided and the Landscape Masterplan appears to indicate only three small areas of playspace for 0-5 year olds will be provided within Phase 2 application boundaries of this application (phase 2)
- 10.6.8 The proposal which generates a child yield of 22 children provides 230m<sup>2</sup> of outdoor provision for under-fives within the linear park whereby only 220m<sup>2</sup> is required by policy. The proposed play areas would be accommodated within the communal open space to provide secure safe environments for the younger children in addition to those proposed in Phase 1. Further playspace would be met on-site within the 'three communal courtyards, as well as the open space across the wider site. This aspect of the proposal complies with Policy 3.6 from the '*London Plan*' 2016 and the Mayors SPG on 'Shaping Neighbourhoods: Play and Informal Recreation' and Policy DC3 of Havering's '*Development Plan Document*' 2008.

#### Entrance and approach/ active frontages

- 10.6.9 The Mayor's Housing SPG calls for entrances to be visible from the public realm and clearly defined. All six blocks would have main entrance points from the main street frontage and would be visible in the public realm and of suitable size. Each

residential block, with the exception of the former Administrative Block (Block B1) and Block B2, which would be served by a single core, would be served by two cores.

- 10.6.10 The ground floor of each of the residential blocks would overlook the communal residential areas so that these areas are activated. Overall it is considered that the proposal would provide active frontages along all publically accessible spaces which would ensure natural surveillance and activity.

Shared circulation

- 10.6.11 The SPG sets out a number of guidelines for shared circulation space, which includes the numbers units that are accessed from each core (eight units); the provision of entry phone, or audio-visual verification to the access control system where applicable; natural light and adequate ventilation where possible.
- 10.6.12 Blocks A1 and C1 would be served by two cores which would have access to a lift each of which would be wheelchair standard. Each core would serve 5 units (1<sup>st</sup> and 2<sup>nd</sup> floor) and 3 units (3<sup>rd</sup> floor) respectively in line with that recommended in the SPG.
- 10.6.13 Blocks B1 and B2 would each be served by a single core that is serviced by a lift in the case of Block B2 and none in Block B1 which is to be retained and converted. The cores to these blocks would not serve more than eight dwellings per floor.
- 10.6.14 Blocks A2 and C2 would each be served by two cores that are serviced by a lift each which is also wheelchair standard. The cores to these blocks would not serve more than eight dwellings per floor.
- 10.6.15 In the absence of details submitted with the application, to accord with the SPG and to ensure the required high standard with regards to functionality, it is therefore considered that an audio-visual entry system should be installed, or such other alternative access security measures as may be appropriate, in accordance with details to be agreed by condition.

Dwelling space standards/ internal heights/ flexibility

- 10.6.16 The minimum space standards are set out at Table 3.3 of the London Plan and are reproduced within the SPG.
- 10.6.17 Policy 3.8(c) of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4 (2) – ‘accessible and adopted dwellings’. Policy 3.8(d) will require 10% of new housing to meeting building regulations M4 (3) – ‘wheelchair user dwellings’. The accessibility requirement of the scheme is considered in detail elsewhere in this appraisal.
- 10.6.18 The proposed 2bed and 3bed units are all shown to exceed the minimum space standards and the proposed 1bed units would meet the minimum standards. The individual rooms within the flats are of good layout and size and suitable internal circulation space is provided in all units. In this respect the proposal is considered acceptable. The development would also achieve the minimum floor to ceiling height of 2.5 metres as required by the Housing SPG.

- 10.6.19 The SPG requires built in storage space to be provided in all new homes. The proposal is shown to provide an adequate level of storage space for each of the units. To ensure compliance with this standard, it is considered necessary to secure this as a condition of any planning permission.
- 10.6.20 The SPG also seeks adequate space and services to work from home. An indicative furniture layout is set out on the application drawings and this demonstrates that all of the flats would have space for a table. As such, each flat would have space flexible for dining and home study/work activities.

Private open space

- 10.6.21 The SPG requires a minimum of 5sqm per 1-2 person dwelling and an extra 1sqm for each additional occupant. Every flat, with the exception of those within Block B1 (converted building), 1<sup>st</sup> and 2<sup>nd</sup> floors of Blocks A1 and C1, would have a private balcony space or terrace which would meet the required standard recommended in the SPG. The SPG also calls for a minimum depth and width of 1.5 metres for all balconies and other private open spaces. The proposed balconies and roof terraces would comply with these minimum dimensions.
- 10.6.22 In addition to private balconies, residents would have access to private communal gardens, which is also consistent with the guidance contained in the Mayors SPG.

Privacy

- 10.6.23 The SPG calls for habitable rooms within dwellings to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Paragraph 2.3.36 of the SPG refers to yardstick separation distances of 18-21 metres between facing habitable room windows.
- 10.6.24 The layout of the units would in general ensure that the privacy of individual units would be maintained. In terms of privacy between the blocks, a distance of at least 24m would be maintained between the rear and front of Blocks and vice versa. This relationship is within acceptable separation distance to preventing direct overlooking between each of the buildings.
- 10.6.25 It is noted that a number of the ground floor units within Block A1 and C1 would have ground floor terraces that front the inside road and the private residential route and communal gardens.
- 10.6.26 The ground floor units located in Blocks A2, B2 and C2 would have terraces that front the private pedestrian routes through the site. The proposed landscaping plans show that planted area would be directly placed in front of these terraces to provide a defensible buffer and provide some privacy to the occupiers of these units and the communal gardens.
- 10.6.27 On balance, having regard to the somewhat high density nature of the proposal of the proposal than the hybrid scheme and taking into account the layout of the building, it is considered that the relationships between residential buildings would secure a standard of privacy that would be commensurately high for the vast majority of future occupiers.

### Dual Aspect

- 10.6.28 The SPG seeks to avoid single aspect dwellings where: the dwelling is north facing (defined as being within 45 degrees of north); the dwelling would be exposed to harmful levels of external noise; or the dwelling would contain three or more bedrooms. The definition of a dual aspect dwelling is one with openable windows on two external walls, which may be opposite (i.e. front & back) or around a corner (i.e. front and side) and the SPG calls for developments to maximise the provision of dual aspect dwellings.
- 10.6.29 All of the units located within the corners of both building would be dual aspect. However it is noted that a large proportion of the units would be single aspect given the constraints of the site. Whilst the preference would be for dual aspect units, the proposed units would have south-east/ west and northwest/east facing aspects and thereby each unit would receive adequate levels of natural daylight. It is considered that the single aspect nature of this development would be off-set by the good internal layout and circulation for each of the units.

### Noise

- 10.6.30 The SPG seeks to limit the transmission of noise between flats, and from lifts/communal spaces to noise sensitive rooms, through careful attention to the layout of dwellings and the location of lifts. Local Plan Policies CP17, DC55 and DC61 include among its privacy and amenity considerations the adequacy of the internal layout in relation to the needs of future occupiers. It is considered that the proposed layout would not have any unreasonable impact in terms of noise on the occupiers of these units.
- 10.6.31 Due to the Block configuration and the number of single aspect units, a number of flats would have bedrooms sited adjacent to living/ kitchen areas of adjoining flats. Whilst this is not ideal, in most cases due to site constraints, this is unavoidable. However, having regard to the fact the development would be a new build and therefore would be required to ensure that sufficient noise insulation is provided to meet Building Regulations. When considered against the requirement for thermal installation also, it is considered that sufficient level of noise mitigation would be achieved to provide a good level of accommodation for future occupiers.
- 10.6.32 The applicant has submitted a noise assessment report to determine whether any mitigation is necessary to achieve reasonable internal and external noise levels. The acoustic report assesses the acoustic performance of the proposed external building fabric and plant noise limits. Noise monitoring was undertaken on 8 May 2018 and a total of two positions were measured as part of the survey (Close to entrance of the former hospital and on the pavement on Hacton Drive). The results showed that the noise levels measured at both locations were dominated by noise from vehicle movements on Suttons Lane .The survey indicates that in insulation of the adjoining traffic noise, the scheme is relatively quiet.
- 10.6.33 In conclusion, subject to the imposition of appropriate planning conditions, it is considered that the impact of noise could be mitigated through the design of the buildings.

### Daylight and Sunlight

- 10.6.34 The SPG (2016) states that “*All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen and dining spaces should preferably receive direct sunlight*” (standard 32). Supporting paragraph 1.3.45 outlines that “*An appropriate degree of flexibility needs to be used when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties as well as within new developments themselves. Guidelines should be applied sensitively to higher development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and the scope for the character and form of an area to change over time.*” Local Plan Policy DC61 includes among its amenity considerations the adequacy of light and outlook within buildings (habitable rooms and kitchens).
- 10.6.35 An assessment of potential impacts on sunlight, daylight and overshadowing has been undertaken and accompanies the application. The daylight and sunlight report is based on the Building Research Establishment’s (BRE) ‘Site Layout Planning for Daylight and Sunlight: A Good Practice Guide’. The assessment considers the impact on the site’s residential neighbours, and on the quality of sunlight and daylight to the new residential dwellings and open space. The methodology adopted is considered to be appropriate.
- 10.6.36 Policy DC61 requires proposals to achieve a high standard of amenity and sets out the considerations for the assessment of amenity, of which light within buildings is one. The weight to be attached to this consideration, within the context of the whole amenity that would be afforded to future occupiers of the development, is ultimately a question of judgement. As mentioned previously, the units are either north-west facing or south-east facing. While these are single aspect units, there will be acceptable level of daylight reaching the units as shown in the submitted Daylight and Sunlight report which stated that all of the units, including the north-west facing single aspect units, would have an acceptable degree of natural light and this has been confirmed by the independent assessment response. As such, it is considered that they would receive a satisfactory level of daylight and sunlight.

### Impact of Development on Neighbouring Occupiers

- 10.6.37 London Plan Policy 7.6 *Architecture* states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy, overshadowing, wind and microclimate.
- 10.6.38 Core Strategy Policy CP17 requires development to respond positively to the local context in terms of design, siting, density and spacing. Policy DC61 requires all development to achieve a high standard of privacy and amenity, and sets out a number of criteria for the consideration of the same. The Council’s Residential Design Guide supplementary planning document is also relevant.
- 10.6.39 The closest existing residential properties to the site are those in Suttons Lane (No’s 62 to 154) on the western side of the road and No. 111 Suttons Lane and No’s 2 to 86 Hacton Drive to the north. With the exception of the gatehouse and its proposed mirror image new dwellings, both of which will be 25m from the properties

opposite in Suttons Lane, the proposed development, will be at least 50m from the front of these properties, in line with the existing buildings on the site. Apart from in 3 locations where the potential for 4-storey development is identified the development would be no higher than 3 storeys. Separated from these properties by Suttons Lane, front gardens and the proposed linear park officers consider that the developments proposed would be consistent with the existing character and pattern of development locally and that no material harm to residential amenity will arise from the buildings by way of their proximity or height.

10.6.40 In relation to the properties in Hacton Drive the proposed development will be set at least 120m from the boundary of the closest property and would be screened by the proposed healthcare development. Similarly, officers do not consider that any adverse impact upon residential amenity will result from this relationship.

10.6.41 In conclusion, the proposed development would not give rise to an unacceptable level of harm to any residential amenities of neighbouring site. It is considered that the proposal would give rise to no conflict with the development plan policies stated above.

## 10.7 **Traffic, Safety and Parking**

10.7.1 The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also contribute to wider sustainability and health objectives. It further recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. London Plan policy 6.3 states that 'development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed'. Policies 6.9 and 6.10 relate to the provision of cycle and pedestrian friendly environments, whilst policy 6.13 relates to parking standards. Core Strategy policy DC33 seeks to 'secure enhancements to the capacity, accessibility and environmental quality of the transport network', reinforcing the aims of London Plan policy 6.13, which aims to contribute to modal shift through the application of parking standards.

10.7.2 The applicant has provided a transport assessment (TA) in support of their proposal, which concludes that the proposal would give rise to no highway or transportation reasons to object to the proposal. The TA *inter alia* includes an assessment of the existing modes of transportation, the existing and proposed uses and the associated trip generation associated with both uses, the impact of construction traffic, servicing, deliveries, pedestrian routes and cycling.

10.7.3 The application site is located in an area with a PTAL of 2/3 which is considered low/moderate and a maximum car parking standard of 1.5 unit to 0.75 unit applies. The current application proposes a total of 179 car parking spaces, equating to an average 1:1 space per unit across the site, comprising: 146 surface car parking spaces; 16 disabled visitor parking spaces and 17 visitor car parking spaces. 20% spaces would have electric charging points installed and a further 20% would be passive to meet London Plan requirement.

- 10.7.4 The applicant has shown the provision of secure cycle storage for the occupiers of the site in line with the requirements set out in the London Plan, achieving at least 1.9 cycle parking spaces per unit. It is envisaged that this level of provision would encourage residents to use an alternative mode of travel to the private car. Sufficient long and short stay cycle parking for Suttons Building would be provided within its boundary and additional public parking would be provided on the public realm.
- 10.7.5 The Council's Highways Authority are satisfied with the level of parking being proposed and welcome the level of cycle parking being provided. TfL has recommended that Cycle parking, Delivery, Servicing, Construction Logistics and Travel Plan must be secured by condition and s106. Accordingly Officers consider that this could be secured under the section 106 agreement.
- 10.7.6 In conclusion, it is considered that the proposed development, subject to the imposition of appropriate conditions and/ or section 106 obligations would have no adverse impact up parking or highway safety and consequently would give rise to no conflict with the above stated policies. TfL have provided an initial response with regard to the scheme and have not raised any fundamental objection.

## 10.8 **Flood Risk and Development**

- 10.8.1 The Council's Strategic Flood Risk Assessment maps show that the site is not located in a higher risk flood zone. London Plan Policy 5.12 *Flood Risk Management* states that development proposals must have regard to measures proposed in Catchment Flood Management Plans.
- 10.8.2 London Plan Policy 5.13 states that development should utilise sustainable urban drainage systems (SUDS) and should aim to achieve greenfield run-off rates and this objective is reiterated in Policy DC48. Policy 5.13 of the London Plan sets out a drainage hierarchy to manage surface water run-off as close to its source as possible.
- 10.8.3 In its Stage 1 response, the GLA confirmed that the proposal complies with Policy 5.12 of the London but the surface water drainage strategy does not comply with London Plan policy 5.13 and policy SI.13 of the draft London Plan; that no water consumption data has been provided to meet the requirements of London Plan policy 5.15 and policy SI.5 of the draft London Plan; that insofar as the surface water strategy relies on Phase 1 drainage system calculation for combined Phase 1 & 2 system has been provided, no information on the existing Phase 1 system has been provided for context. It is considered that the proposed run-off rate may be secured as a condition of any planning permission. In this regard, and subject to the imposition of suitable conditions, the proposal would give rise to no conflict with the above stated policies.

## 10.9 **Accessibility**

- 10.91 Policy DC7 of the Local Plan and policy 3.8(c) of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4 (2) –

'accessible and adopted dwellings'. Policy 3.8(d) will require 10% of new housing to meeting building regulations M4 (3) – 'wheelchair user dwellings'. Furthermore, The London Plan policy 7.2 requires all future development to meet the highest standards of accessibility and inclusion.

10.9.2 The Design and Access Statement and the submitted plans demonstrate that at a minimum all homes would meet Part M4(2) of the Building Regulations and at least 10% of the homes would be wheelchair adaptable to meet the requirements of Part M4(3). The applicant has stated that the affordable rented wheelchair units would be fully fitted for wheelchair user.

10.9.3 On this basis, the proposed development will give rise to no conflict with the above stated policies.

## 10.10 **Sustainability**

10.10.1 Policy 5.1 of The London Plan (2016) seeks to achieve an overall reduction in London's carbon dioxide emissions of 60 per cent by 2025. For 'major' developments (i.e. 10 or more dwellings), policy 5.2A/B of The London Plan sets out the 'lean, clean, green' approach to sustainability, which is expanded in London Plan policies 5.3A, 5.7B, 5.9B/C, 5.10C and 5.11A. The London Plan carbon dioxide reduction target for residential buildings during the period 2016-2019 is to achieve zero carbon. If zero carbon cannot be delivered on site, then any short would need to be offset through cash in lieu 6.11.2 In respect of the non-domestic building, London Plan policy 5.2 requires development for the period of 2016-2019 to achieve as per what is required under building regulations.

10.10.2 Core Policy DC48 requires development proposals to incorporate sustainable building design and layout.

10.10.3 The applicant has submitted a Sustainability and Energy Report. The energy report sets out that a 35.7% reductions in regulated CO<sub>2</sub> emission is predicted to be achieved onsite.

10.10.4 The Energy Strategy sets out the following approaches to be taken to achieve the London Plan CO<sub>2</sub> target reduction:

"Be Lean" – construct the buildings to a high thermal performance with Uvalues exceeding minimum Building Regulations targets. .

"Be Clean" – installation of gas powered community heating and hot water. Be clean would typically be associated with Combined Heat and Power (CHP). It is proposed to incorporate a gas community CHP system powering the residential units, the retail and community hall.

10.10.5 "Be Green" – installation of photovoltaic (PV) solar panels to the flat roofs. Having assessed various different forms of renewable technology, the Energy Strategy concludes that PV solar panels as the most appropriate form of renewable technology for this development.

10.10.5 Whilst a detailed design will be necessary to demonstrate that the proposed development will achieve the overall CO<sub>2</sub> reduction, it is anticipated that through the above measures the proposal will achieve an overall CO<sub>2</sub> reduction of 35.7%. In terms of carbon offset, it is estimated that 126 tonnes of residential CO<sub>2</sub> emissions would need to be offset through site contributions. This is estimated at £226,800. The final offset contribution would be determined after a completed SAP certificate has been provided. The mechanism to secure this would be through the section 106 agreement.

10.10.6 Notwithstanding the above, the GLA has advised in its Stage 1 response that further revisions and information are required before the energy proposals can be considered acceptable and compliance with Policy 5.2 of the London Plan and Policy SI2 of the draft London Plan. Officers are of the view that this can be resolved at the Stage 2 to GLA.

10.10.7 In conclusion, the development would accord with development plan policies. To ensure compliance with these standards, a condition is attached requiring a post occupation assessment of energy ratings, demonstrating compliance with the submitted energy report.

#### **10.11 Environmental Impact Assessment (EIA)**

10.11.1 The application has been screened under the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (as amended) and whilst the development would exceed the applicable threshold, it is considered that the development does not constitute Environmental Impact Assessment (EIA) Development as the development would have relatively low impact on the wider environment.

#### **10.12 Statement of Community Involvement**

10.12.1 The NPPF, Localism Act and the Council's Statement of Community Involvement encourage developers, in the case of major applications such as this to undertake public consultation exercise prior to submission of a formal application.

10.12.2 Prior to the submission of this application, the applicant did hold Public Information Event. The applicant had sent out leaflets of invitation to local residents that residing close to the site. The applicant also advertised the public event in the local newspaper.

10.12.3 The Council also sent out letters of consultation to local residents in the surrounding area inviting them to make representations on the proposed development.

10.12.4 The applicant has sought to encourage public consultation in respect the proposal in line with the guidance set out in the NPPF and the Localism Act.

## **10.13 Archaeology**

- 10.13.1 An Archaeological Desk Based Assessment has been submitted with the application which has identified the presence of prehistoric settlement sites and features across the sites. It is also noted that many of the existing buildings on the site are in themselves of historic, if not archaeological interest and that provision should be made for a programme of Historic Building Recording should be carried out.
- 10.13.2 Historic England (GLAAS) advise that the proposals would either affect a heritage asset of archaeological interest or lies in an area where such assets are expected. The advice is that there is a need for field evaluation to determine the appropriate mitigation. A condition is requested requiring a two stage process or archaeological investigation to evaluate and clarify the nature and extent of surviving remains, followed, if necessary by a full investigation. Staff consider that subject to such a condition the development would be acceptable in principle and would comply with Policy 7.8 of the London Plan and Policy DC70 of the LDF.

## **10.14 Ecology and Biodiversity**

- 10.14.1 A Baseline Ecological Appraisal has been undertaken based on the results of an Extended Phase 1 Habitat Survey of the site, desk based studies and species surveys for Badgers, Great Crested Newts and Bats as well as general faunal activity observed during the course of survey work. Following from the recommendations of the Extended Phase I Survey Phase 2 ecological surveys were undertaken including a bat scoping survey and a reptile presence/absence survey.
- 10.14.2 In terms of impact upon habitat, by basing the masterplan (hybrid scheme) layout upon the existing rectilinear layout with landscaped corridors, staff are satisfied that the impact upon ecology and biodiversity would be minimised, and wherever possible enhanced, for example by a reduction in the amount of hard standing and the creation of a central open space in the same location as the most significant area of existing open space on the site.
- 10.14.3 Positive and preventative measures are proposed to address areas of concern in relation to bats, reptiles and birds such as the retention and provision of roost opportunities, provision of specialist bird boxes aimed at the existing known breeding avian population, plus full surveys of particular habitats and protected species. These matters can all be safeguarded by the use of appropriate conditions. Natural England has not raised any fundamental objection to the proposal.
- 10.14.4 The Landscaping Officer has recommended a number of conditions that should be imposed to ensure that the development undertakes the relevant surveys and incorporates appropriate ecological enhancement on site. Subject to these conditions, it is considered that the development would be acceptable in this regard.

## **11 Financial and Other Mitigation**

- 11.1 The heads of terms of the section 106 agreement have been set out above. These are considered necessary to make the application acceptable, in accordance with

policy 3.2 of The London Plan 2016 and policies DC06 of the Havering Core Strategy 2008.

11.2 The proposal would attract the following Community Infrastructure Levy contributions to mitigate the impact of the development:

- The London Borough of Havering's CIL was adopted in September 2019. Therefore financial contributions for the education infrastructure will be secured via this mechanism. As the proposed floor area for the development is 17,192sqm and the CIL charging schedule applies a charge of £125 per sqm to any development in Zone A (any development north of the A1306). Therefore the applicable fee is £1,896,672.50.
- The Mayor has established a CIL charging schedule with a recent amendment that came into force from 1<sup>st</sup> April 2019. The amendment increases the CIL contribution by £5 per square metre to £25. The proposed development would be liable for this charge. The development would result in 15,173.38 square metres. Therefore a mayoral contribution of £379,334.50 is applicable, subject to any relief for social housing or existing floorspace.

## 12 Other Planning Issues

12.1 Secure by Design is a material planning consideration and would be covered by condition and is more appropriately considered at reserved matters stage.

12.2 At pre-application stage, the application was presented to the Strategic Planning Committee on 4 July and 13 September 2018. The most recent comments recorded were:

- Parking, level of. How this sits against the London Plan.
- Traffic flow outside of the site. How development will impact upon that.
- Site visit gave opportunity to understand built quality of heritage asset.
- Change in unit sizes welcomed. Meets Havering needs more.
- Home for Hornchurch Aerodrome Society (HAS) welcomed.
- Parking well laid out.
- Improvement in built quality welcomed.
- Does each home get a car parking space in the first phase?
- Involvement of Met Police/Designing Out Crime Team in scheme design.
- What proportions will be smart homes?
- Nominations for Affordable Housing.

12.3 The issues raised above have been addressed and form part of the context of this report. Designing Out Crime – a condition to secure compliance is attached; there are no unit identified to be 'smart home' – this is to be secured by condition.

## **13 Conclusions**

- 13.1 The proposed redevelopment of the site would provide a high quality residential development which would be a positive contribution to this area of Hornchurch. The site is currently occupied by buildings of a former hospital which is characterised by a varied configuration of built forms depicting the era that they were constructed. The loss of the hospital buildings, though locally listed, is afforded no protection in the adopted development plan. The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, and good routes, access and makes a positive contribution to the local area, in terms of quality and character and would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.
- 13.2 The proposed would secure the provision of onsite affordable housing at a level that meets the minimum affordable housing target set out in the development plan. Overall, the number of units proposed would positively add to the Council's housing delivery targets. The proposal would also see the provision of a community hall.
- 13.3 The proposed redevelopment of the site would result in a modern, contemporary design that responds positively to the local context, and would provide appropriate living conditions which would be accessible for all future occupiers of the development.
- 13.4 The layout and orientation of the buildings and separation distance to neighbouring properties is considered to be satisfactory to protect the amenities of the neighbouring occupiers and the development would contribute towards the strategic objectives of reducing the carbon emissions of the borough.
- 13.5 The proposal is considered to be acceptable in respect of all other material issues, including parking and highway issues, impact on amenity and environmental effects.
- 13.6 Subject to planning conditions, the requirement for a S106 agreement and no contrary direction from the Mayor for London, officers consider the proposals to be acceptable and recommend that planning permission be granted.
- 13.7 The decision to grant planning permission has been taken having regard to the National Planning Policy Framework 2018, the policies and proposals in The London Plan (2016), the Havering Core Strategy and Development Control Policies Development Plan Document 2008 and to all relevant material considerations, and any comments received in response to publicity and consultation.