



## STRATEGIC PLANNING COMMITTEE AGENDA

<b>7.00 pm</b>	<b>Thursday 10 October 2019</b>	<b>Council Chamber - Town Hall</b>
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Members 8: Quorum 4

### COUNCILLORS:

**Conservative Group  
(4)**

Dilip Patel (Chairman)  
Timothy Ryan (Vice-Chair)  
Ray Best  
Maggie Themistocli

**Residents' Group  
(1)**

Reg Whitney

**Upminster & Cranham  
Residents' Group  
(1)**

Linda Hawthorn

**Independent Residents  
Group  
(1)**

Graham Williamson

**Labour Group  
(1)**

Keith Darvill

**For information about the meeting please contact:**

**Taiwo Adeoye - 01708 433079  
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**To register to speak at the meeting please call 01708 433100  
Before 5.00PM on Tuesday 8 October 2019**

## **Protocol for members of the public wishing to report on meetings of the London Borough of Havering**

Members of the public are entitled to report on meetings of Council, Committees and Cabinet, except in circumstances where the public have been excluded as permitted by law.

Reporting means:-

- filming, photographing or making an audio recording of the proceedings of the meeting;
- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing, so that the report or commentary is available as the meeting takes place or later if the person is not present.

Anyone present at a meeting as it takes place is not permitted to carry out an oral commentary or report. This is to prevent the business of the meeting being disrupted.

Anyone attending a meeting is asked to advise Democratic Services staff on 01708 433076 that they wish to report on the meeting and how they wish to do so. This is to enable employees to guide anyone choosing to report on proceedings to an appropriate place from which to be able to report effectively.

Members of the public are asked to remain seated throughout the meeting as standing up and walking around could distract from the business in hand.



## **AGENDA ITEMS**

### **1 CHAIRMAN'S ANNOUNCEMENTS**

The Chairman will announce details of the arrangements in case of fire or other events that might require the meeting room or building's evacuation.

These are the arrangements in case of fire or other events that might require the meeting room or building's evacuation. (Double doors at the entrance to the Council Chamber and door on the right hand corner (marked as an exit).

Proceed down main staircase, out the main entrance, turn left along front of building to side car park, turn left and proceed to the "Fire Assembly Point" at the corner of the rear car park. Await further instructions.

#### **Development presentations**

I would like to inform everyone that Councillors will receive presentations on proposed developments, generally when they are at the pre-application stage. This is to enable Members of the committee to view the development before a planning application is submitted and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional and subject to full consideration of any subsequent application and the comments received as a result of consultation, publicity and notification.

#### **Applications for decision**

I would like to remind members of the public that Councillors have to make decisions on planning applications strictly in accordance with planning principles.

I would also like to remind members of the public that the decisions may not always be popular, but they should respect the need for Councillors to take decisions that will stand up to external scrutiny or accountability.

Would everyone in the chamber note that they are not allowed to communicate with or pass messages to Councillors sitting on the Committee during the meeting.

### **2 APOLOGIES FOR ABSENCE AND ANNOUNCEMENT OF SUBSTITUTE MEMBERS**

(if any) - receive.

### **3 DISCLOSURE OF INTERESTS**

Members are invited to disclose any interest in any of the items on the agenda at this point of the meeting.

Members may still disclose any interest in an item at any time prior to the consideration of the matter.

**4 MINUTES** (Pages 1 - 4)

To approve as a correct record the minutes of the meeting of the Committee held on 12 September 2019 and to authorise the Chairman to sign them.

**5 DEVELOPMENT PRESENTATIONS** (Pages 5 - 6)

**6 PE/00778/2019 - NEOPOST HOUSE, RONEO CORNER** (Pages 7 - 14)

**7 APPLICATIONS FOR DECISION** (Pages 15 - 18)

**8 P1917.18 ST GEORGE'S HOSPITAL** (Pages 19 - 60)

**9 P0751.19 - NEW PLYMOUTH AND NAPIER HOUSES, DUNEDIN ROAD, RAINHAM**  
(Pages 61 - 100)

**Andrew Beesley**  
**Head of Democratic Services**

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**MINUTES OF A MEETING OF THE  
STRATEGIC PLANNING COMMITTEE  
Council Chamber - Town Hall  
12 September 2019 (7.00 - 9.00 pm )**

**Present:**

**COUNCILLORS 8**

<b>Conservative Group</b>	Dilip Patel (Chairman), Timothy Ryan (Vice-Chair), Ray Best and +Carol Smith
<b>Residents' Group</b>	Reg Whitney
<b>Upminster &amp; Cranham Residents' Group</b>	Linda Hawthorn
<b>Independent Residents Group</b>	Graham Williamson
<b>Labour Group</b>	Keith Darvill

An apology for absence was received from Councillor Maggie Themistocli.

+Substitute members: Councillor Carol Smith (for Maggie Themistocli)

Councillor Paul McGeary was also present at the meeting.

There were about 25 members of the public and 2 press present for the meeting.

The Chairman reminded Members of the action to be taken in an emergency.

**18 DISCLOSURE OF INTERESTS**

There were no disclosures of interest.

**19 MINUTES**

The minutes of the meeting held on 15 August 2019 were agreed as a correct record and signed by the Chairman.

**20 PE/00185/19 - JEWSON DEPOT, 307/309 SOUTH STREET, ROMFORD**

The Committee received a developer presentation from Charles Dunnett (Mayer Brown) and Adam Wilkinson from Boyer Planning.

The proposal before Members was for the redevelopment of site to provide for a new Jewson warehouse with associated parking and 47 residential units built over 3-6 storeys and 6000sqm of commercial b1 and b8 space, with associated parking and landscaping.

The main issues raised by Members for further consideration prior to submission of a planning application were:

- A keenness to understand in more detail the relationship between the residential units and the proposed/retained commercial use. What are the impacts and how could these be managed?
- The trading hours of the proposed/retained commercial use.
- An opportunity to improve outlook from residential units with additional landscaping (as opposed to a view of a Jewson yard).
- How the traffic movements would be managed on site 1) within the mixed use component to the front and 2) within the yard to the rear.
- How would any parking overspill be managed on the surrounding streets
- Further detail should be provided to explain the rationale behind the unit mix. Could more family units be provided
- Potential to improve the quality of the frontage on to Lyon Road
- Details were sought about the refuse and recycling arrangements
- Sustainability credentials of the buildings
- Further consideration was invited on whether 7 storeys was contextually appropriate

**21 PE/00213/2017 - BRIDGE CLOSE, ROMFORD**

The Committee received a developer presentation from Jonathon Kendall (Fletcher Priest Architects), Tom Waddicor (Maccleanor Lavington Architects) and Kieran Wheeler from Savills.

The proposal before Members was for the demolition of existing buildings and erection of up to 1070 homes, a three form entry primary school with associated nursery, Health hub, pedestrian/ cycle bridge over river rom, vehicular access to waterloo road, public open space areas, relocation on-site of the Havering Islamic Cultural Centre, existing businesses and relocation of Ambulance station off-site.

The main issues raised by Members for further consideration prior to submission of a planning application were:

Specifically in relation to the full component of the hybrid application



- That the developer reflect further on schools drop offs and pick-ups given the Committee's observation that these arrangements could be more complex than suggested - particularly as pupils would not always be resident on site and drops offs and pick-ups could often involve grandparent support. The Committee sought reassurance that the arrangements outlined could work in practice

Specifically in relation to the outline component of the hybrid application

- The Committee were keen to understand the exact proportion of 3 bed units being proposed (in contrast to the indicative range given)
- What level of on-site parking provision was going to be available for the community use and health hub
- What controls could be put in place to manage any noise emanating from the community use
- What the specific log jam was relative to identifying an occupier for the health hub
- The Committee was looking for confidence that the infrastructure proposed could be delivered and within a timeframe that meets the needs of the occupants of the site

22     **P1057.17 - 165/193 NEW ROAD, RAINHAM**

The Committee considered the report and **RESOLVED** that **PLANNING PERMISSION BE GRANTED** subject to the conditions as set out in the report.

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**Chairman**

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## **Development Presentations**

### **Introduction**

1. This part of the agenda is for the committee to receive presentations on proposed developments, particularly when they are at the pre-application stage.
2. Although the reports are set out in order on the agenda, the Chair may reorder the agenda on the night. Therefore, if you wish to be present for a specific application, you need to be at the meeting from the beginning.
3. The following information and advice only applies to reports in this part of the agenda.

### **Advice to Members**

4. These proposed developments are being reported to committee to enable Members of the committee to view them at an early stage and to comment upon them. They do not constitute applications for planning permission at this stage (unless otherwise stated in the individual report) and any comments made are provisional and subject to full consideration of any subsequent application and the comments received following consultation, publicity and notification.
5. Members of the committee will need to pay careful attention to the probity rules around predisposition, predetermination and bias (set out in the Council's Constitution). Failure to do so may mean that the Member will not be able to participate in the meeting when any subsequent application is considered.

### **Public speaking and running order**


6. The Council's Constitution only provides for public speaking rights for those applications being reported to Committee in the "Applications for Decision" parts of the agenda. Therefore, reports on this part of the agenda do not attract public speaking rights, save for Ward Members.
7. The items on this part of the agenda will run as follows:
  - a. Officer introduction of the main issues
  - b. Developer presentation (15 minutes)
  - c. Ward Councillor speaking slot (5 minutes)
  - d. Committee questions
  - e. Officer roundup

**Late information**

8. Any relevant material received since the publication of this part of the agenda, concerning items on it, will be reported to the Committee in the Update Report.

**Recommendation**

9. The Committee is not required to make any decisions with respect to the reports on this part of the agenda. The reports are presented as background information.

 <b>Havering</b> LONDON BOROUGH	<b>Strategic Planning Committee 10 October 2019</b>
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<b>Pre-Application Reference:</b>	<b>PE/00778/2019</b>
<b>Location:</b>	<b>NEOPOST HOUSE, SOUTH STREET, ROMFORD</b>
<b>Ward:</b>	<b>HYLANDS</b>
<b>Description:</b>	<b>ERECTION OF FOUR BLOCKS TO PROVIDE 100 RESIDENTIAL UNITS</b>
<b>Case Officer:</b>	<b>SIMON THELWELL</b>

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## **1 BACKGROUND**

- 1.1 This proposed development is being presented to enable Members of the committee to view it before a planning application is submitted and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional and subject to full consideration of any subsequent application and the comments received as a result of consultation, publicity and notification.
- 1.2 In June 2019, planning permission was refused for development for three blocks ranging from 5 to 8 storeys to the southern and eastern parts of the site adjacent to the retained Neopost House to provide 104 units. Reasons for refusal included a poor pedestrian environment dominated by parking; poor privacy, outlook and daylight for future occupiers due to close proximity of blocks; development prejudicing future development of adjoining land through placing elevation on the boundary; inadequate amenity space in terms of quantum and quality; single aspect poor quality dwellings. A scheme similar to that subject of refusal, was subject to pre-application developer presentation to Members of the Strategic Planning Committee in July 2018.
- 1.3 The applicant has been seeking to address the reasons for refusal and has been engaged in pre-application meetings with officers. The new proposal has also been subject to Quality Review Panel (QRP) which took place on 5<sup>th</sup> September 2019. The scheme has continued to be developed following feedback from the QRP and officer comments.

## **2 PROPOSAL AND LOCATION DETAILS**

### **2.1 Proposal**

As last seen by officers, the proposal was for the following (may be subject to change as a result of feedback given):

- Erection of 4 x new residential buildings adjacent to Neopost House; block A of 11 storey height on the frontage to Roneo Corner, blocks B, D and D of 5-7 storeys alongside Neopost House on its eastern side, close to the boundary with B&Q.
- The 4 new blocks would comprise 100 new dwellings, of which 35% will be affordable. Neopost House itself has been granted Prior Approval for conversion to residential use and is currently being converted.
- Vehicle access will be as at present from South Street and new pedestrian accesses from South Street and Roneo Corner are proposed.
- Amenity space for the development will be created through the provision of communal gardens at ground floor, as well as private gardens/terraces and balconies. Parking is provided at ground floor level.

### **2.2 Site and Surroundings**

- The site is located close to the junction of Roneo Corner and Rom Valley Way, on the south side of Romford Town centre, in an area of mixed uses.
- The site has reasonable access to public transport and other services, it is a little over half a mile (10-15 minutes' walk) to the railway station and has a PTAL of between 2 and 4
- Neopost House is a prominent building existing on the proposed application site. Access to the site and its ground floor parking is from South Street. Immediately to the west the first phase of the Vickers House development has been completed and this consists of 9 storeys. Phase 2 also of 9 storeys to front Roneo Corner has not yet been constructed.
- East of Neopost House is the Tesco and B&Q but the surrounding area to the north, west and south is predominantly residential.

#### **Planning History**

2.3 The following planning decision is relevant to the application:

J0016.16 Prior Approval for conversion of Neopost House to 120 flats.  
Approved December 2016

J0027.17 Prior Approval for conversion of Neopost House to 112 flats.  
Approved 16 January 2018.

J0010.18 Prior Approval for conversion of Neopost House to 120 flats.  
Approved 10 April 2018

J0018.18 Prior Approval for conversion of Neopost House to 109 flats.  
Approved 20 June 2018

J0038.18 Prior Approval for conversion of Neopost House to 109 flats  
Approved 21 December 2018

P1726.18 Replacement of all existing windows with new casing and glazing  
and associated alterations  
Approved 11 January 2019

P0030.19 Three blocks ranging from 5 to 8 storeys above deck level,  
providing 104 residential dwellings (Use Class C3) and erection of 6  
residential dwellings (Use Class C3) to form an additional floor on Neopost  
House  
Refused 14 June 2019

P0883.19 Erection of additional storey to provide 6 flats  
Under consideration

P1022.19 New Substation  
Approved 21 August 2019

J0030.19 Prior Approval for conversion of Neopost House to 115 flats. Under  
consideration

### **3 CONSULTATION**

3.1 At this stage, it is intended that the following will be consulted regarding any  
subsequent planning application:

- Mayor of London (GLA)
- London Fire Brigade

- Environment Agency
- Historic England
- Thames Water
- Essex and Suffolk Water
- EDF Energy
- National Grid

#### **4 COMMUNITY ENGAGEMENT**

- 4.1 In accordance with planning legislation, the developer is planning to consult with the local community on these proposals as part of the pre-application process. This is due to take place following feedback from this Committee.

#### **5 MATERIAL PLANNING CONSIDERATIONS**

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

- Principal of development
- Quantum and height of development
- Quality of Design/Impacts on living conditions
- Parking/Traffic
- Affordable Housing
- QRP Feedback

##### **5.2 Principal of Development**

- This is a brownfield site close to Romford Town Centre that is no longer required for its existing use. At all levels of planning policy, including the emerging Local Plan there is strong encouragement to maximise the use of such sites when they become available. Bringing forward this type of site that could be delivered in the short term will support the Council in meeting its housing requirement.
- The site has no formal allocation for a specific use. The Council's Proposed Modifications following the submission of the Local Plan state that Romford has potential for significant regeneration and intensification, and national, London Plan and local policies seek to optimise the use of brownfield land for meeting the demand for new homes, and other growth. The site is not designated as an employment area. It could be said that a residential use has been established through the grant of Prior Approval for the conversion of Neopost House. There are therefore no policy objections to the loss of office and providing additional residential units.



### **5.3 Quantum and Height of Development**

- The proposed density would exceed the ranges identified in the current London Plan and the adopted Local Development Framework. The emerging London Plan suggests moving away from the density matrix approach however, and in any case, density is only one indication of the appropriateness of proposed development. What would be important in assessing such a high density proposal is whether it delivers sufficient quality of design and provides a high quality living environment for future occupiers.
- The existing Neopost House (6 storeys), adjacent Vickers House (up to 9 storeys), and to some extent the YMCA building opposite (11 storeys), has established the principle of taller buildings close to the very dominant and extensive highway infrastructure at this junction. However, the height and scale of buildings surrounding the site reduces to the north of the site. The buildings proposed to the rear of the site, ranging from 5 to 7 storeys, could be considered appropriate in this context. The proposed 11 storey building to the front of the site facing Rom Valley Way represents an increase in three storeys from the previous application and would need to be justified through a thorough townscape and contextual approach and Members may wish to comment on this part of the proposal.

### **5.4 Quality of Design/Impacts on Living Conditions**

- Previously, with regard to the refused application, there were concerns that proposed buildings would be in fairly close proximity to the existing Neopost House and the site boundaries resulting in poor quality environment for existing and future residents in terms of light and outlook as well as concern over prejudicing the future development of adjacent sites. The revisions that have been made seek to address this by reducing the width of the rear buildings and setting them off from the boundary. The results are considered to be an improvement to existing and proposed residential amenity.
- The refused proposal included a shared podium amenity deck and single aspect units right on the boundary to the B&Q service yard. The revised plans address this concern through being dual aspect and set off the boundary. Amenity space is now at ground floor and the quantum and quality of this would need to be assessed. A number of the proposed dwellings remain as single aspect north facing which can offer poor quality living environment and this will need to be considered carefully in assessing the overall acceptability of the proposal.

- With the previous proposal, the quality of pedestrian access to the proposed buildings was a concern with conflict with vehicles and lack of legibility to proposed routes. The revised proposals seek to create a generous pedestrian entrance separated from vehicles from the pedestrianised part of South Street and this is considered to be an appropriate response to the issues raised.

## 5.5 **Parking/Traffic**

- It is not anticipated that the proposals will generate materially more traffic than the present office use which has 117 parking spaces. The refused application proposed 120 parking spaces. As a result of the revisions made, principally to set buildings off the boundaries and create attractive ground floor routes and spaces for pedestrians/residents, the number of parking spaces proposed has been reduced – exact numbers to be confirmed. A reduced parking provision would be in line with the submitted Local Plan (Policy 24), given the sites proximity to the town centre and public transport and the majority of proposed dwellings being 1-2 bed units. Car club spaces are also proposed and consideration will need to be given on whether access to on-street parking permits should be restricted.

## 5.6 **Affordable Housing**

- 35% affordable housing is proposed. It is proposed that the affordable housing provision will be compliant with Council's preferred mix; i.e. 70% social rented, 30% intermediate/shared ownership. This is in accordance with policy requirements.

## 5.7 **Quality Review Panel (QRP) Comments**

- The submitted planning application was subject to QRP (Chair and Vice Chair Review) which formed the basis of the conclusion regarding the poor quality of the proposal.
- The QRP (Chair and Vice-Chair Review) have reviewed the revised proposals and made the following comments:

*The panel feels that the proposals are significantly improved from those presented at the previous review, and in particular it welcomes the decision to step back from the eastern boundary of the site. The pedestrian entrance from the pedestrianised section of South Street has also been improved. In addition, the panel feels that relocating the play space to the south of the mansion flat blocks is successful.*

*There are however still unresolved issues. Given the density of the scheme, it needs to provide a very high quality of public realm, with as much greenery as possible. This public space will require a secure maintenance plan as a condition of consent, to ensure a high quality place is created. The boundary along the western edge of the development is particularly important and should be well-defined and greened to contribute to an attractive pedestrian route along South Street and to signal the entrance to the development. In addition, the panel feels that the increase in height to eleven storeys on Roneo Corner is problematic in terms of massing and the weight of development on a busy road. It is broadly supportive of the design of the mansion blocks to the east of the site, but that Block A is relatively underdeveloped and requires further work to produce a successful building.*

### **Financial and Other Mitigation**

5.8 The proposal would attract the following section 106 contributions to mitigate the impact of the development:

- Contributions to improved pedestrian/cycle access in vicinity of site

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

- £25 per square metre Mayoral CIL towards Crossrail
- £125 per square metre Havering CIL

### **5.10 Other Planning Issues**

- Archaeology
- Consideration of microclimate
- Servicing Management Plan
- Sustainable design and construction measures
- Secured by Design

## **Conclusions**

5.10 Following refusal of the earlier scheme, the proposed revisions have been considered at pre-application meetings with officers and by the QRP, with the scheme being developed as a result. There are some aspects that require further work as identified in this report and Members' guidance will be most helpful to incorporate as the various elements are brought together.

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## **Applications for Decision**

### **Introduction**

1. In this part of the agenda are reports on strategic planning applications for determination by the committee.
2. Although the reports are set out in order on the agenda, the Chair may reorder the agenda on the night. Therefore, if you wish to be present for a specific application, you need to be at the meeting from the beginning.
3. The following information and advice only applies to reports in this part of the agenda.

### **Advice to Members**

#### Material planning considerations

4. The Committee is required to consider planning applications against the development plan and other material planning considerations.
5. The development plan for Havering comprises the following documents:
  - London Plan March 2016
  - Core Strategy and Development Control Policies (2008)
  - Site Allocations (2008)
  - Romford Area Action Plan (2008)
  - Joint Waste Development Plan (2012)
6. Decisions must be taken in accordance with section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004. Section 70(2) of the Town and Country Planning Act 1990 requires the Committee to have regard to the provisions of the Development Plan, so far as material to the application; any local finance considerations, so far as material to the application; and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Committee to make its determination in accordance with the Development Plan unless material planning considerations support a different decision being taken.
7. Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects listed buildings or their settings, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses.
8. Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development

which affects a conservation area, the local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

9. Under Section 197 of the Town and Country Planning Act 1990, in considering whether to grant planning permission for any development, the local planning authority must ensure, whenever it is appropriate, that adequate provision is made, by the imposition of conditions, for the preservation or planting of trees.
10. In accordance with Article 35 of the Development Management Procedure Order 2015, Members are invited to agree the recommendations set out in the reports, which have been made based on the analysis of the scheme set out in each report. This analysis has been undertaken on the balance of the policies and any other material considerations set out in the individual reports.

#### Non-material considerations

11. Members are reminded that other areas of legislation cover many aspects of the development process and therefore do not need to be considered as part of determining a planning application. The most common examples are:
  - Building Regulations deal with structural integrity of buildings, the physical performance of buildings in terms of their consumption of energy, means of escape in case of fire, access to buildings by the Fire Brigade to fight fires etc.
  - Works within the highway are controlled by Highways Legislation.
  - Environmental Health covers a range of issues including public nuisance, food safety, licensing, pollution control etc.
  - Works on or close to the boundary are covered by the Party Wall Act.
  - Covenants and private rights over land are enforced separately from planning and should not be considered.

#### Local financial considerations

12. In accordance with Policy 6.5 of the London Plan (2015) the Mayor of London has introduced a London wide Community Infrastructure Levy (CIL) to fund CrossRail.
13. Other forms of necessary infrastructure (as defined in the CIL Regulations) and any mitigation of the development that is necessary will be secured through a section106 agreement. Where these are necessary, it will be explained and specified in the agenda reports.

### **Public speaking and running order**

14. The Council's Constitution allows for public speaking on these items in accordance with the Constitution and the Chair's discretion.
15. The items on this part of the agenda will run as follows:
  - a. Officer introduction of the development
  - b. Registered Objector(s) speaking slot (5 minutes)
  - c. Responding Applicant speaking slot (5 minutes)
  - d. Councillor(s) speaking slots (5 minutes)
  - e. Cabinet Member Speaking slot (5 minutes)
  - f. Officer presentation of the material planning considerations
  - g. Committee questions and debate
  - h. Committee decision

### **Late information**


16. Any relevant material received since the publication of this part of the agenda, concerning items on it, will be reported to the Committee in the Update Report.

### **Recommendation**

17. The Committee to take any decisions recommended in the attached report(s).





 <b>Havering</b> LONDON BOROUGH	<b>Strategic Planning Committee 10 October 2019</b>
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<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>• 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.</li><li>• The application is of strategic importance and therefore must be reported to the Committee.</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:
  - 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 m2 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 estimate that 126 tonnes of residential CO<sub>2</sub> emissions would need to be offset through of 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 it 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 cause 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.

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 <b>Havering</b> LONDON BOROUGH	<b>Strategic Planning Committee 10 October 2019</b>
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<b>Application Reference:</b>	<b>P0751.19</b>
<b>Location:</b>	<b>Napier House and New Plymouth House, Dunedin Road, Rainham RM13 8LD</b>
<b>Ward:</b>	<b>South Hornchurch</b>
<b>Description:</b>	<b>Demolition of existing buildings and redevelopment of site comprising a number of buildings ranging between 3-10 storeys, providing 197 residential dwellings (Class C3), public and private open space, formation of new accesses and alterations to existing accesses, associated car and cycle parking and associated works.</b>
<b>Case Officer:</b>	<b>Nanayaa Ampoma</b>
<b>Reason for Report to Committee:</b>	<b>The application is of strategic importance and has been submitted in partnership with the London Borough of Havering. The Local Planning Authority is considering the application in its capacity as local planning authority and without regard to the identity of the Applicant.</b>

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## **1. BACKGROUND**

- 1.1 The application site is south of the Borough within the South Hornchurch Ward. It does not fall within a conservation area and there are no listed buildings on or adjoining the site. However there are long views towards the

Rainham Conservation Area which is approximately 360 metres away at its nearest point. At present, the buildings on the site are in the process of being demolished with the previous car parking area having been demolished already. It is projected that all demolition work should be completed by January 2020. These demolition works were granted permission by virtue of Prior Approval permission (F0004.18)

- 1.2 As part of the pre-application process, the development proposals were presented for comment to both the Quality Review Panel and the Strategic Planning Committee on two occasions. Officers have worked closely with the developer throughout the pre-application stage to ensure comments raised have been fully considered and where possible incorporated into the final scheme.
- 1.3 The proposed redevelopment is for the demolition and redevelopment of two residential blocks and a car parking site in Dunedin Road, Rainham. The buildings date back to the 1960s and have been due for refurbishment for a number of years. The site sits between New Road to the south and Dunedin Road to the north. The existing buildings contained 97 residential units with 90% of the units allocated for social housing. The application has been brought forward through a joint venture partnership between Wates and the London Borough of Havering (LBH).
- 1.4 The proposal would result in 197 C3 units better utilisation of the site for housing and represent 64% affordable housing. The development is strongly supported by the Greater London Authority (GLA) and there are no statutory objections.

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

- 2.1 There are no in principle objections to the proposals and through the application of conditions and a legal agreement officers are able to secure a good level of design and the use of high quality materials. The application is supported by the Greater London Authority (GLA) and the LBH's Regeneration and housing divisions as it would contribute to the housing demand in the Borough.
- 2.2 The approach to site layout, height and massing represents an acceptable approach given the location of the site. This scale was also reviewed by a panel of independent professionals at a Quality Review Panel. A full suite of supporting technical information has been submitted which successfully demonstrates that neighbouring amenity would be adequately safeguarded. Policy compliant levels of internal floorspace, amenity space and cycle parking have also been incorporated into the scheme.

- 2.3 The development would make an important contribution to housing delivery within the Borough by securing 197 units with 126 affordable housing units. Although the proposed density would be greater than that set out in the Density Metrix, the overall quantum of development and associated density reflects national, regional and local level policy objectives that seek to encourage the most efficient use of land within accessible urban settings and the residential development would accord with the sustainable development directive provided by the NPPF (2019).
- 2.4 The recommended conditions and Heads of Terms would secure future policy compliance by the applicant on the site and ensure any unacceptable development impacts are mitigated. Therefore officers consider that all matters have now been sufficiently addressed and the application is recommended for approval.

### **3 RECOMMENDATION**

- 3.1 That the Committee resolve to GRANT planning permission subject to:
- Any direction by the London Mayor pursuant to the Mayor of London Order
  - Legal Agreement pursuant to s106 of the Town and Country Planning Act 1990 and other enabling provisions, with the following Heads of Terms:
    - Affordable Housing 64% to be delivered with a tenure split of 70:30 between social rent and affordable rent.
    - Affordable housing rent levels secured
    - Early and late Stage Viability Review Mechanisms attached.
    - Linear Park contribution sum of £154,407 to be indexed
    - Carbon offset fund contribution in respect of shortfall of the residential units to achieve a 100% reduction in carbon dioxide emissions compared to Part L of the Building Regulations 2013, such sum calculated at sixty pounds (£60.00) per tonne that falls below the 100% threshold, for a period of 30 years, duly Indexed, and the commercial units; and in respect of the commercial units to achieve a 35% reduction in carbon dioxide emissions compared to Part L of the Building Regulations 2013, such sum calculated at sixty pounds (£60.00) per tonne that falls below the 35% threshold, for a period of 30 years, duly Indexed
    - Job Brokerage 4 per 10,000spm of development to be indexed
    - Traffic Management contribution of £10,000, Indexed. For the review of waiting and loading restrictions on loading restrictions on New Road.
    - On-street cycle parking contribution of £15,000 for the provision of cycle parking in the vicinity of the site, Indexed.
    - Restriction on obtaining parking permits for occupiers.

- Controlled Parking Zone contribution £22,064 (£112 per unit) to be indexed.
  - Travel Plan (including the appointment of a Co-ordinator)
  - Enter into a Planning Performance Agreement (PPA) with the LPA for the discharge of conditions.
  - Reasonable legal fees for the drafting and negotiation of the deed whether or not it goes to completion
  - Monitoring fee towards the Council costs of monitoring compliance with the deed
  - 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 10<sup>th</sup> April 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. Podium level Landscaping treatment
6. Secured by Design
7. 90% of the dwellings shall be designed to be Category 2 'Accessible and adaptable' and 10% Wheelchair Adaptable Dwellings
8. Window and Balcony Details
9. Photovoltaic Panel Details
10. Brown Roof Details
11. Flood mitigation, warning and preparation details (GLA)
12. Details of Boundary Treatments
13. Energy Statement Compliance
14. Air Quality Mitigation Measures
15. Updated Micro Climate Study
16. External Lighting Scheme
17. Noise protection (A1306)
18. Sound Insulation (Plant noise/Machinery)
19. Noise protection measures (Airborne Noise)
20. Contaminated Land Investigation

21. Remediation Strategy for Contaminated Land
22. Surface Water Drainage Strategy
23. Updated Sustainable Drainage Systems (SUDs)
24. Water efficiency
25. Car Parking Plan
26. Car Parking Management Plan
27. Disabled Parking Plan
28. Electrical Charging Points
29. Vehicle Access Prior to Occupation
30. Pedestrian Visibility Splays To Access
31. Cycle Parking Management Plan
32. Demolition and Logistics Plan
33. Construction Method/Management Statement
34. Delivery and Servicing Plan
35. Diversion of Public Footpath
36. Highways Works
37. Measures to off-set excess transport emissions
38. Construction Hours
39. Vehicle Cleansing
40. Refuse and Recycling Details

### **Informatives**

1. Fee required for approval of details
  2. Changes to the public highway
  3. Highway legislation
  4. Temporary use of the public highway
  5. Adoption of roads
  6. Surface water management
  7. Highway approval required
  8. Secure by design
  9. Street naming and numbering
  10. Community Infrastructure Levy (CIL).
  11. Planning obligations
  12. NPPF positive and proactive
  13. Thames Water Groundwater Risk Management Permit
- 3.4 That the Committee confirms that it has had special regard to the desirability of preserving the settings of listed buildings and features of special architectural or historic interest as required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 3.5 That the Committee confirms that it has paid special attention to the desirability of preserving or enhancing the character and appearance of the

Rainham Village Conservation Area as required by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

#### **4. SITE AND SURROUNDINGS**

- 4.1 The application site is south of the Borough in Rainham at about 0.6 miles from Rainham Station. The application relates to the residential towers known as Napier House and New Plymouth House on Dunedin Road as well as the associated car parking area next to New Plymouth House. The site area measures 0.79 hectares. The site currently consists of the demolished car parking area and the two residential towers that are due for demolition in the winter. Each block is 13 storeys in height with Napier House having 49 units and New Plymouth house having 48 units. As such, there are a total of 97 residential units. The blocks date back to the 1960s and were finished in a mix of brick, concrete, panelling and metal to windows/balconies.
- 4.2 The application site does not fall within a conservation area and there are no listed buildings on site. The site falls within flood zone 3 and has a Public Transport Accessibility Level (PTAL) rating of 2. There are no Tree Preservation Orders (TPO).
- 4.3 The application has been brought forward via a joint venture partnership between Wates and London Borough of Havering. The site already benefits from permission to demolish under the prior approval process.

#### **5 PROPOSAL**

- 5.1 The application seeks planning permission for the demolition of the existing residential towers at Napier House and New Plymouth House, as well as the demolition of the car parking area to the west of these sites. The demolition would make way for the redevelopment of the site to provide 197 residential (C3) mixed tenure units built over 3-10 storeys. This would be an increase of 100 residential units when compared to the original number of units at the site. Of these 17 units would be wheelchair accessible and 126 would be affordable housing.
- 5.2 The 197 units would be built across three C-shaped blocks (A, B and C). Residential parking for 92 spaces would be provided at the ground floor level of all the Blocks with Block A and B being joined internally at this level. Six disabled parking spaces would be provided at Blocks A-B and four at Block C.

Summary Block storeys	
Block A	3-7
Block B	3-10



Block C	3-9
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- 5.3 Cycle storage for 355 bicycles would also be provided at ground floor.
- 5.4 The development would include an extensive outdoor green space area at podium (first floor) and ground floor levels. In total, this would provide for 5250 square metres of shared amenity space, with an additional 1100 square metres of private defensible residential space.
- 5.5 The proposed residential units would have an overall mix as follows:

Units Counted Across All Block Floors						
<i>Block(s) Floor</i>	<i>1B2P</i>	<i>2B3P</i>	<i>2B4P</i>	<i>3B5P</i>	<i>3B5P(Duplex)</i>	<i>Total Number</i>
<i>Grnd Flr</i>	13		3		10	26
<i>1<sup>ST</sup> Flr</i>	14	2	9	4	(10*)	29
<i>2<sup>ND</sup> Flr</i>	20		17	3		40
<i>3<sup>rd</sup> Flr</i>	12	1	16	3		32
<i>4<sup>th</sup> Flr</i>	6	1	8			15
<i>5<sup>th</sup> Flr</i>	6	3	6			15
<i>6<sup>th</sup> Flr</i>	6	3	6			15
<i>7<sup>th</sup> Flr</i>	4	2	4			10
<i>8<sup>th</sup> Flr</i>	4	2	4			10
<i>9<sup>th</sup> Flr</i>	2	1	2			5
	87	15	75	10	10	<b>197</b>

*\*Duplex over ground and first floors.*

- 5.6 Refuse and recycling are also proposed at ground floor via sustainable underground refuse storage (URS) facilities. URS's are not able to store larger waste goods so storage for larger waste goods are provided in Block A1 entrance. This space would be shared for residents across all three Blocks.
- 5.7 In terms of material finish, a mix of three bricks are to be used with metal details of bronze to balconies and the main entrances.

## 6 PLANNING HISTORY

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

- **F0004.18:** Prior Approval for Demolition of Two Tower Blocks Comprising Of 1- 49 New Plymouth House & 1-49 Napier House. - ***Prior Approval Not Required, March 2019***
- **Z0006.18:** EIA under Regulation 6 of the Town and Country Planning Regulations 2017 for Napier and New Plymouth House. - ***Screening Opinion issued, July 2018***
- **P0376.14:** New Plymouth House removal of existing disused and dilapidated pram stores to provide 2 new flats. - ***Granted, July 2014***
- **P1541.02:** Security lighting columns. ***Approved, October 2002***
- **D0058.97:** Installation of one equipment cabin and development ancillary. ***Certificate issued, August 1997***
- **D0047.97:** 6x antennae, 3 microwave dishes supported on 6m tower, together with 30cu.m cabin. ***Certificate issued, August 1997***
- **G0001.97:** Proposed roof level radio cabin. ***Approved, July 1997***

## 7 STATUTORY CONSULTATION RESPONSE

7.1 A summary of consultation response are detailed below:

- ***Transport for London:*** No objections. Further comments to follow.
- ***Greater London Authority (Stage 1):*** The proposals are strongly supported subject to compliance with the London Plan and Draft London Plan policies on estate regeneration.
  - There must be like for like replacement of social housing in terms of floor space, units and habitable rooms.
  - 65% affordable housing comprising entirely of social rent/London Affordable Rent units. This is acceptable subject to verification that more could not be secured. Rent levels confirmed and secured via S106. Together with an early and late review mechanism,
  - Further details required in regards to impact on nearby townscape and heritage impact. Further clarification is also required for internal duplex units and the provision of additional east facing windows for Block C adjacent to playing fields.
  - Proposed energy reduction of 32% whilst this falls short of Policy 5.2 it is accepted that there is no other potential to reduce CO<sup>2</sup> emissions. However further information in relation to overheating and future

proofing the scheme for connection to a potential district heat network and overheating is required.

- The net reduction in open space (-1,849sqm) would be mitigated against the proposed private, communal and public open space and would provide a significant qualitative improvement on the existing situation, both in terms of access, ownership, function but also in terms of biodiversity, urban greening and in addressing the impacts of climate change.
- The proposed parking and cycle parking provisions are in keeping with policy.

Therefore the development is acceptable subject to further details conditions and a S106 agreement.

- **Environment Agency:** No objection
- **Thames Water:** No objection subject to Ground Water Risk Permit informative.
- **Natural England:** No objection subject to conditions.
- **NATS Safeguarding:** No safeguarding objection.
- **London Fire Brigade:** No objection. No further fire hydrants required.
- **London Fire and Emergency Planning Authority:** No objection subject to compliance with following requirements:-
  - Firefighting lift installed in tower;
  - Wet rising main to be provided in the firefighting shaft (within 18 metres of appliance parking position);
  - Sprinkler system to be installed in accordance with BS9251:2005; dry raising main in south east stairwell (inlet within 18 metre of appliance).
- **Metropolitan Policer Secure by Design Officer:** No objection subject to the attachment of secured by design conditions.
- **LBH Flood & Water Management:** No objection. The development provides for brown roof at roof level this should help reduce surface water runoff. Details for the roof garden will be secured via condition. However as the applicant is seeking to avoid infiltration methods and has not evidenced this, the percolation test results are required. As updated SUDs Strategy should therefore be provided.

- **LBH Environmental Health:** No objection subject to conditions governing contaminated land, air quality, noise and sound insulation.
- **LBH Highways:** No objection subject to conditions governing works to the public footpath, highways works and vehicle cleansing. Also, the following legal agreements are required:
  - Section 106 Agreement governing the following Heads of Terms:
    - On-street cycle parking contribution of £15,000 for the provision of cycle parking in the vicinity of the site, Indexed.
    - Controlled Parking Zone highways contributions £22,064 (£112 per unit).
    - Traffic Management contribution of £10,000, Indexed for the review of waiting and loading restrictions on loading restrictions on New Road
    - Future occupiers should be prevented from obtaining parking permits.
- **LBH Children's Services:** No objection subject to education contributions. Based on an average calculation it is expected that the development would result in the education demand for 80 pupils between early years to 16 year olds. A contribution via CIL or S106 should be made.

## 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 PREAPPLICATION DISCUSSIONS

### *Quality Review Comments*

- 9.1 As part of the pre-application process, the proposals for the site have been subject to two Quality Review Panels in July and November 2018. In the latter review the panel commended the design team on the improvements made to the scheme since the July 2018 review in particular the reworking of the central green space and the podiums. The applicant's willingness to positively engage in the early stages of the pre-app process has benefited the scheme. However, the majority of the landscape detail has not been provided as part of the application. This together with the long-term management of the public space will need to be secured through conditions.

- 9.2 The panel suggested that the architecture should draw more heavily on the character of the area and felt that the proposed facades were too generic, particularly at street level and entrances, and along the whole of Dunedin Road. The Design Team have sought to address some of these issues through the subsequent pre-application meetings through introduction of materials that reflect the marshland area in tone and the industrial heritage of the area through the use of bronze metal at the entrances. The exact materials have not been provided as part of the planning submission and therefore the quality of the building, particularly the detailing, that will be delivered would need to be secured through robust assessment of details submitted through conditions.
- 9.3 The panel were comfortable with the proposed building heights, provided the scheme is of very high quality, as this is an exceptional site because of the existing towers. Overall there are the right ingredients for delivery of a high-quality scheme. Subject to further details around material finishes the proposal may be acceptable.

*Strategic planning comments (December 2018, February 2019)*

- 9.4 Comments received by the Committee December 2018 were as follows:
- Include design measures to prevent inappropriate use of the pathways as a short cut by vehicles wishing to access New Road
  - The height of the buildings
  - Demonstrate why the heights proposed are acceptable
  - Quantum and ratio of car parking provision for residents and visitors, especially as existing on street provision is already stretched and bus routes are limited
  - Futureproofing the car parking to enable Electric Vehicle Charging points to be incorporated
  - Review level of cycle parking provision. Could car/cycle parking space be used flexibly subject to levels of demand
  - The proposed unit mix and how that compares to the existing unit mix within the blocks to be demolished
  - Increased family housing
  - Look at where the smaller units were located in the height stack, put the smaller units higher up and the family units lower down to enable easier access
  - Consider the material choice. Make sure that the buildings are attractive, especially given the nature of the blocks coming down
  - Air quality: what consideration has been given to that?
  - Is there an ability to open up the green roofs for access?
  - Daylight and sunlight: detail invited on how that works
  - Post meeting request: ensure that digital connectivity is built into the development

*Officer Response: Following these comments and as per the submission, the applicant has responded as below:*

- *Include design measures to prevent inappropriate use of the pathways as a short cut by vehicles wishing to access New Road*
  - *Design measures to deter antisocial use of the cycle path will be incorporated as part of the public adoption process. The position of the URS bins along Dunedin Road acts as a deterrent to vehicles from the north.*
- *The height of the buildings*
  - *Building A: +28.15m AOD – 7 storeys*
  - *Building B: +37.60m AOD – 10 storeys*
  - *Building C: +34.19m AOD – 9 storeys*
- *Demonstrate why the heights proposed are acceptable*
  - *The two existing buildings (Napier House and New Plymouth House) were +39.73m AOD and 13 storeys tall. The proposed buildings reduce the overall height in comparison to the existing buildings and introduces a varied form of townscape which sits more comfortably within the existing townscape. A fully robust townscape assessment has been undertaken from 4 separate verified viewpoints producing fully accurate visualisations of what the proposed buildings will look like from key local views and this demonstrates the proposal would not have a harmful impact compared with existing.*
- *Quantum and ratio of car parking provision for residents and visitors, especially as existing on street provision is already stretched and bus routes are limited*
  - *A total of 92no. car park spaces (incl. 10no. disabled spaces) are proposed which equates to a parking ratio of 0.47 spaces per dwelling. There is no dedicated visitor parking proposed on-site. This approach meets the aims of the London Plan's Policy 6.1 as restricting parking spaces will promote the use of alternative sustainable transport modes such as public transport, walking and cycling. Rainham Station is only 0.6mi to the southeast (14-min walk) and the yet to be constructed Beam Park Station will be located approximately 0.9 mil to the southwest (16-min walk).*
  - *To demonstrate that parking impacts will not impact surrounding car parking supply, a parking survey was undertaken on Tuesday 11<sup>th</sup> and Wednesday 12<sup>th</sup> September 2018 between 12:30am-5:30am on roads within 500m of the proposed development site.*

- The survey found that 14 of 74 (19%) car parking spaces on the estate were being utilised, and 156 of 448 (35%) of on-street car parking spaces were being utilised within 500m of the site demonstrating a low-utilisation of and demand for on-street car parking.
- Futureproofing the car parking to enable Electric Vehicle Charging points to be incorporated
  - In line with the London Plan, 20 per cent of all spaces will have active electric charging facilities, with passive provision being provided for all remaining spaces.
- Review level of cycle parking provision. Could car/cycle parking space be used flexibly subject to levels of demand
  - A total of 350no. of cycle parking spaces have been provided to comply with TfL's standards which requires 1.5 space per 1 bedroom unit, and 2 spaces per 2+ bedroom units. Additionally, 6no. of short-stay visitor spaces are provided in the 'green corridor'.
  - As requested, at the last SPC we presented a plan which showed additional parking spaces that could be achieved in the future were the cycling parking spaces not taken up.
  - Car park spaces are to be leased with a maximum of one space per unit. All spaces will require a permit. Each lease will include a "lift and shift" provision to enable the managing agents of the development to control parking and respond to the differing needs of the residents and the development in the long term. Cycle stores will be strategically located to allow future flexibility of use – this could provide additional car parking spaces.
- The proposed unit mix and how that compares to the existing unit mix within the blocks to be demolished

*Existing Mix*

	1B2P	2B3P	Total
Affordable	43	44	87
Private	5	5	10
<b>Total</b>	<b>48</b>	<b>49</b>	<b>97</b>

*Proposed Mix*

	1B2P	2B3P	2B4P	3B5P	3B5P Duplex	Total
Affordable	56	10	43	7	10	126
Private	31	5	32	3	0	71
<b>Total</b>	<b>87</b>	<b>15</b>	<b>75</b>	<b>10</b>	<b>10</b>	<b>197</b>

- Increased family housing

- *A total of 20no. 3-bed family focused houses are proposed, this is a significant uplift compared with the existing buildings which do not contain any 3-bed units. A large proportion of the 3 bed units proposed are duplex units which have their own front door and private garden spaces (at podium level). Furthermore, all of the 2 bedroom units (other than 2) have two double bedrooms - these meet the Mayor's definition of family sized housing in the draft London Plan.*
- *Look at where the smaller units were located in the height stack, put the smaller units higher up and the family units lower down to enable easier access*
  - *All of the 3-bed family units are located on the lower levels (GF – 3F levels). The duplex units all have direct access at ground floor level and podium levels. All of the 3-bed homes are dual aspect.*
- *Consider the material choice. Make sure that the buildings are attractive, especially given the nature of the blocks coming down*
  - *All buildings are proposed to utilise high-quality façade materials, including brick, wet cast reconstituted stone, weather steel and metal. Please see 'Indicative Materials Key' for further colour information and 'indicative Proposal View 01-03' to review rendered visualisations.*
- *Air quality: what consideration has been given to that?*
  - *An Air Quality Assessment has been submitted and assessed as being acceptable by the council's Public Protection team. The assessment has demonstrated that future residents will experience acceptable air quality, with pollutant concentrations below the air quality objectives. The increase in traffic associated with the proposed development of the site has been screened out as being insignificant.*
  - *Overall, the construction and operational air quality effects of Napier and New Plymouth House are judged to be 'not significant'.*
- *Is there an ability to open up the green roofs for access?*
  - *The proposed 'Central Garden' and podium level gardens provide policy compliant levels of amenity space for the proposed number of residential units. However, enabling access to the green roofs is not possible as these spaces are required to accommodate the amount of solar panels required to meet the required reductions in carbon dioxide. Opening these spaces up could generate additional management issues and costs.*
- *Daylight and sunlight: detail invited on how that works*
  - *A Daylight and Sunlight Report has been submitted which has assessed impacts to surrounding properties as well as the proposed*



*dwellings at NNP. In terms of the impacts on neighbouring properties, the report concludes that the proposal would not materially affect the daylight and sunlight received by these properties in accordance with Havering's planning policies and the industry standard BRE guidance. For the proposed dwellings, the testing of the internal daylight conditions generally comply with the industry standard BRE guidance in line with many modern developments. All of the proposed amenity spaces would meet the BRE guidance.*

- *Post meeting request: ensure that digital connectivity is built into the development*
  - *High-speed fibre optic connectivity will be built into the development.*

9.5 Comments received by the Committee February 2019 were as follows:

- Reassurances sought that the development would be secure/become gated.
- Charging points needed to be robust to prevent vandalism.
- Daylight and sunlight details were still needed.
- Invite amendments to height to redistribute the units.
- Opportunity for increased family unit provision.
- A strong traffic/parking management plan was needed.
- A survey was needed of existing/former residents to establish their parking needs, detail of that is invited with the submission.
- Opportunity to add/create social value through the scheme.

*Officer Response: In answer to the above the applicant has sort to incorporate Members recommendations and responded as follows:*

- *Reassurances sought that the development would be secure/become gated.*
  - *The private under-croft car parks and cycle stores will all be secured with restricted access. The Metropolitan Police Secured by Design Officer has reviewed the scheme and considers it to be acceptable. The central garden is a public amenity space and provides connectivity between surrounding neighbourhoods and will not have restricted access.*
- *Charging points needed to be robust to prevent vandalism.*
  - *Specific charging points will be agreed with officers as part of the development.*
- *Daylight and sunlight details were still needed.*
  - *These have been provided.*

- *Invite amendments to height to redistribute the units.*
  - *Reduction in height on the tallest building from 11 storeys to 10 with the area lost redistributed to lower levels. This ensured the proposed buildings were all lower than the existing buildings.*
- *Opportunity for increased family unit provision.*
  - *Additional Duplexes were introduced along New Road increasing the amount of two storey family homes with direct access to the podium gardens.*
- *A strong traffic/parking management plan was needed.*
  - *A Car Park Management Strategy has been included within the submitted Transport Assessment.*
  - *Car parking spaces are to be leased with a maximum of one space per unit. All spaces will require a permit. Each lease will include a “lift and shift” provision to enable the managing agents of the development to control parking and respond to the differing needs of the residents and the development in the long term. Disabled spaces will be allocated on a needs basis.*
  - *The private on-site car parking area, outside the remit of Havering's parking services, will be privately managed by the Applicants' preferred enforcement operator who will be responsible for maintaining safety, security and enforcing the regulations. The Applicants will be responsible for providing parking information to users including residents, visitors and staff who use the site.*
- *A survey was needed of existing/former residents to establish their parking needs, detail of that is invited with the submission.*
  - *This was undertaken and submitted as part of the formal application.*
- *Opportunity to add/create social value through the scheme*
  - *Social value will be created through the implementation of the following programmes:*
    - **Work Experience Placement** - *Opportunities aimed at providing persons that are unemployed / considering a career change to carry out tasks agreed by their supporting organisation and Wates. This will also include work experience placements for students in Havering considering entering the building trades.*
    - **Training Weeks On-Site** - *Aimed at individuals who are studying qualifications from level 1 to 8, including apprenticeships, higher apprenticeships and graduates.*
    - **Jobs Creation On-Site** - *Work with LBH job hub team, JCPs & local employment vehicles to advertise jobs and fill positions with Havering residents.*

- **Further Education** - Support the hired workforce to gain further skills, qualifications and knowledge to a nationally recognised qualifications equivalent to level 2 or above.
- **School Engagement** – School engagement programmes to inspire young people from under-represented groups between the ages of 11-16 to consider joining the construction sector.
- **SME/Supply Chain Strategy** - To build on inward investment on the local economy within the Havering, we will use reasonable endeavour to procure contracts locally. We will ensure that opportunities are advertised to SMEs locally. We will be supporting our supply chain to procure goods locally and record this as a second tier spend.

## 10 LOCAL REPRESENTATION

- 10.1 The application was advertised via a Press Notice and Site Notice displayed at the site for 21 days.
- 10.2 A formal neighbour consultation was also undertaken with 200 neighbouring properties being notified of the application and invited to comment. Comments have been received from 21 neighbours
- 10.3 The following local groups/societies made representations:
- None.
- 10.4 The following Councillor(s) made representations:
- *Councillor Durant*: (Objection): I am concerned **P0751.19** is an overdevelopment of the site as the buildings are too high and will adversely impact on local services, amenity and highway. Also, it would be out of keeping with the approved plans for south side of A1306 at Dovers Corner and could potentially adversely impact on Rainham Village Conservation Area if Persimmons Homes seek to submit plans to go higher in response to the council plans.
- 10.5 The following neighbour representations were received:
- 19 objectors
  - 2 comments.
  - No petitions have been received.
- 10.6 A summary of neighbours comments is given as follows (as only material comments can be considered as part of the application assessment, these comments have been divided into “material” and “non-material” comments):

## **Material Representations**

### *Objections*

- Building height is unacceptable at this location.
- Development would lead to the loss of privacy of existing residents.
- The development would add to the existing parking pressures. The transport statement acknowledgment that maximum of 207 suggested however the development only proposes 97.
- The development would significant increase traffic along Cherry Tree Road into Dunedin Way, increasing an unreasonable level of traffic along this route. There has been a recent stabbing which lead to a bottleneck being created along this route. Increased number of cars would cause congestion.
- The plans are unclear
- The proposed parking spaces are insufficient to meet the 207 spaces required under the Council's own policies.
- A meeting with local residents should have been had before submission.
- The development would lead to reduced open space in the area.
- The proposed development would be of a greater scale than the existing property.
- Development would be too close to Blewitts Cottage – refuse is too close to property and would encourage rodent issues, west wing trees too close and may cause potential subsidence, this may negatively affect my property and block out sunlight; podium garden would overlook property.
- The proposed increase to existing units from 97 to 197 is too much of an overdevelopment at the site.
- There are already traffic calming methods such as speed humps outside the school which demonstrates that the Council is already aware of traffic issues along the road adding further cars would be unacceptable.
- The development would lead to the closure of some roads and footpaths.
- The development does not have adequate provision of family housing.
- The development does not comply with policy.
- Inefficient community facilities are being provided by the development. For example no doctor's offices, schools, hospital or clinics.
- Nearly 200 units is too much for a village that currently cannot cope.
- The proposal would be cheap and ugly looking.
- At 10 storeys would have fire safety issues. A low rise building would be more suitable.
- The development would harm the existing Conservation Area and heritage within Rainham.
- A separate entrance via New Road should be made so that access is not only via Dunedin Road for cars. Otherwise accidents are likely to happen.

- The proposed development would result in a loss of green space in an area already losing green spaces.
- Insufficient school spaces have been considered by the development.
- We need homes that will last, be safe and be in area where there are services to look after the people in them.

#### *Support*

- None.

*Officer Response: The above comments are addressed within the Design, Amenity and Highways sections of the report. In regards to the Council's required Notice. A number of public consultations were undertaken by the developer prior to the submission from 2016 and the proposals were made public via local news representations such as the Romford Recorder in May 2016 and 2019. Therefore this legislation has been complied with. Provisions for school places and other infrastructure would be secured through CIL.*

#### **Non-material representations**

- 10.7 Below is a summary of comments received from neighbours that do not represent material planning considerations for the determination of the application. This is because they fall outside of the remit of planning. This includes the marketing of properties, purchases of the properties, neighbour disputes and the value of properties.

- Development would reduce property prices.
- The Council has failed to provide sufficient notice under Section 123 of the Local Government Act 1972 (Disposal of Land by Councils) and Section 226 of the Town and Country Planning Act (Compulsory Purchase of Land). "The Council has failed to explicitly demonstrate the case for more intensive development on the site than previously existed"

*Officer notes: the impact on the property prices cannot be considered under the planning assessment. The disposal or acquisition of land by the Council is not relevant to the consideration of planning applications.*

#### **Procedural issues**

- 10.8 No procedural issues were raised in representations.

### **11 MATERIAL PLANNING CONSIDERATIONS**

- 11.1 The main planning considerations are considered to be as follows:

- Principle of Development

- Design
- Housing Mix
- Affordable Housing
- Impact on Neighbouring Amenity
- Environment Issues
- Parking and Highways Issues
- Sustainability
- Flooding and Drainage
- Community Infrastructure Levy

### **Principle of Development**

- 11.2 The principle to develop a residential block on site has already been established by the current use. Therefore the development would comply with the Council's current policy framework. Permission for the demolition of the development has also been given under Prior Approval (see permission F0004.18).
- 11.3 The proposed development would also comply with the Rainham and Beam Park Planning Framework by contributing to the green network. The proposal would not hinder the implementation of the wider Masterplan as shown in the Framework. The proposal would contribute to realisation of the proposed Linear Park and A1306 Road improvements which would contribute to the setting of the development and the significant changes taking place to this part of the Borough through regeneration. The development site sits within the London Riverside Opportunity Area and the Rainham and Beam Park Housing Zone where it is projected that the housing zone would produce 3250 new residential units.

### **Design**

#### *Scale, massing and streetscene*

- 11.4 The NPPF 2019 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'*
- 11.5 Policies 7.4 and 7.6 of the London Plan state that new development should be complementary to the established local character and that architecture should make a positive contribution and have a design which is appropriate to its context. Policy 7.7 states that tall building should be limited to sites close to good public transport links and relate well to the scale and character of surrounding buildings, improve the legibility of an areas, have a positive relationship with the street and not adversely affect local character.

- 11.6 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.
- 11.7 The application site is located in the predominantly residential area of Dunedin Road and New Road. The west of the site is adjacent to Blewitts Cottages. To the east of the site are the playing fields for Our Lady of La Salette RC Church school. The majority of dwellings in the locality are of two storey height. The application site is extremely unusual in the location, being the only towers of 13 storeys and could be said to be somewhat out of character. However, the existing character of the site is a relevant consideration and a development which is respectful of the existing character would not be considered inappropriate, subject to achieving good design.
- 11.8 The proposed scheme reflects a contemporary style and comprises 3 building blocks. Block A, (part 1, part 3, part 4 and and part 7 storeys above street level) is positioned west of the site adjacent to Blewitts Cottages which is a 2 storey terrace of houses. Closest to the boundary, the height would be three storey to the north and south and single storey in between with podium level amenity space, rising to four storey on to Dunedin Road and seven storey to New Road. The proposed massing then gradually climbs up to Block B (part 1, part 3, part 4 and part 10 storeys above street level) positioned in the centre of the site. Block B would sit next to the main ground level open space and would be part four/part ten storey fronting New Road and part three/four storey to Dunedin Road. To the east of the site, Block C (part 1, part 3, part 4 and part 9 storey) which would sit next to the playing fields of the La Salette School playing field. The building would be part nine/part four storey to New Road and part four/part three storey to Dunedin Road.
- 11.9 Careful consideration has been given to the design and massing of the residential tower blocks with the majority of the higher parts of the blocks being situated away from the two-storey low rise character. The position of the higher parts of the blocks being on New Road relate better with the more suburban feel of the properties on Dunedin Road where the proposed scale is less. The distribution of height and massing throughout the three blocks is well balanced and the separation between the three main apartment blocks is considered to be suitable.
- 11.10 The development is sufficiently set back from Dunedin Road to ensure the building line relates sensibly to surrounding development, and to prevent an overbearing impact upon the streetscene at that elevation. The proposed height is comparable to the existing blocks so justifies the scheme at that location. The use of the green landscape at ground floor and podium softens the appearance of the block massing and allows the development to relate

better to the nearby playing field and open areas immediately adjacent the site. The change in scale between the building blocks creates interest in frontages and works well.

- 11.11 No concerns are raised in relation to impact on the Rainham Conservation Area being over 0.3 miles away. In long views it would appear from the views submitted in support of the application that the proposal would not harm the nearby historic environment.
- 11.12 Materials samples have been submitted with the application to demonstrate the quality of external finishes. The applicant has proposed brick finishes as follows: Block A (Taylor Maxwell Cream brick, Carsington Cream), Block B (Bradgate, Medium Grey), Block C (Michelmersh Red brick, First Quality Multi). Balconies would be finished with white wet cast stone with metal detailing railings. The entrance areas to the flats would be encased in a bronze metal cladding. Whilst further details are required regarding mortar types and further metalwork samples for example regarding the entrances, officers consider that the details currently presented provide adequate detail to demonstrate that a high quality finish can be achieved.
- 11.13 There have been a number of neighbour comments objecting to the style of the proposed building and high number of units, with houses preferred. However, given the pressures on land, the need to balance the economic benefits of the scheme so that further developments can come forward and the growing pressures for homes, a development of houses alone at the site would likely be unviable and would not sufficiently contribute to meeting the housing demand in the area.
- 11.14 There is a clear balance to be made between the need to provide for the growing demand for housing within the Borough and the type of housing suitable to meet this demand. Unfortunately, as the Council cannot meet the housing needs through its own funding, the economic benefits of these schemes must also become an important element of the assessment. The current scheme is a clear attempt to contribute towards the Borough wide housing targets. The proposal would replace existing towers. Therefore the development is context driven.
- 11.15 A comprehensive green landscape with a good level of quality is proposed and the development would make contributions toward Borough programs such as the linear park, cycle ways and other infrastructure.
- 11.16 The applicant makes provisions for sustainable modes of energy with the installation of Photovoltaic Panels (PV) on the roof of all three blocks. These would sit atop of brown and green roofs to further enhance biodiversity. Details for these will be secured by condition.



- 11.17 Overall, the development would contribute positively to the surrounding area and would enhance the area visually subject to securing high quality finish through the details required by condition.

*Quality of residential accommodation*

- 11.18 Policy 3.5 of the London Plan states that new residential units should provide the highest quality internal environments for their future residents by meeting minimum floor areas in accordance with the Government's technical housing standards set out in Table 3.3. These requirements are also further elaborated within the Mayor's London Housing SPG (Technical housing standards - nationally described space standards). Together these form the pivotal backbone for the quality of any future residential accommodation. The SPD details specific space standards for communal areas, storage, bathroom spaces and corridors width.
- 11.19 All units comply with the London Plan and the National Technical Housing Standards in terms of overall size, storage, communal space and bathroom size. Therefore it is considered that all units are of an acceptable quality.

*Amenity Space*

- 11.20 Havering's Residential Design SPD does not prescribe minimum space standards for private amenity space stating that the fundamental design considerations for amenity space should be quality and usability. However balconies should be incorporated into all developments and should, as a minimum, be 1.5 metres in depth to allow adequate space for a table and chairs and should be secure. All upper storey units have a balcony. In addition, a total of 5250 square metres of communal amenity space is also proposed across podium level and ground floor. This is significantly over the required outdoor amenity space required under the London Plan.
- 11.21 Three areas specifically designated for play are proposed totally 580sqm. However details regarding the exact play area treatment and equipment are required to be secured by condition. It will be required that they comply with LEAP (Local Equipped Area for Play) play area guidance of at least 5 experiences. However the position and space given to play is suitable and considered safe.

*Sunlight and Daylight to Proposed Units*

- 11.22 The applicant has provided an internal and external daylight assessment against the Building Research Establishment (BRE) guidelines for the lower parts of the blocks, measuring the average daylight factor (ADF) within living rooms to understand the amount of daylight afforded to these spaces. An ADF of 5% is recommended for a well day lit space, 2% for partly lit, below 2% the

room will likely be dull and require electric lighting. As a minimum of 1.5% ADF for living rooms is recommended.

- 11.23 The assessment considers the likely levels of sunlight, daylight and views of the sky for possible future residents as well as the possible loss of light to existing occupiers.
- 11.24 It demonstrates that overall (when adjusted in keeping with the guidance), all amenity spaces would comply with the BRE standards. 432 of the 528 (82%) of the rooms tested would fully comply with BRE standards. In some cases where rooms did not comply this was owing to the position of an overhanging balcony. However, where the rooms failed there was still good visibility to the sky for 50% of the units (that fall short) or the rooms were not primary living spaces such as bedrooms or living rooms. There are a number of single aspect units. However only one of these units is north facing (ground floor, Block A). Overall these units are considered to be of a generous size and are therefore suitable. The overall outlook and light levels to all these units, including the Block A north facing unit, are considered acceptable. There would be no significant impact on the level of sunlight and daylight amenity to existing neighbours compared to the existing arrangements at the site. Therefore it is considered that the development is acceptable.
- 11.25 Considering the above, the overall development would provide a good quality of accommodation to future occupants in terms of daylight and sunlight.

#### *Access/Disabled Units*

- 11.26 Policy 3.8 of the London Plan states that 10% of new units within a development should be wheelchair accessible or easily adaptable for residents who are wheelchair users. Provision should also be made for affordable family housing, wheelchair accessible housing and ensure all new housing meets parts M4 (2) and (3) of the Building Regulations as follows:

##### *Part M4(2)*

- *90% of the dwellings shall be designed to be Category 2 'Accessible and adaptable'*

##### *Part M4(3)*

- *10% of the dwellings shall be designed to be Category 3 'Wheelchair user dwellings'*

- 11.27 Details submitted with the application fail to fully demonstrate full compliance with the provision of M4(2) as the floor plans for each unit needs further clarification. However there appears to be sufficient space to meet this requirement. Therefore clarification would be secured via condition.

- 11.28 The development also fails to comply with the provision of M4(3). 17 disabled units are proposed under the scheme which is less than the required 10% of the total units. However the applicant is happy for this to be secured by condition. In addition, officers consider that the position of some of the disabled units are too high and would compromise the safety of the relevant end-users in the event of an emergency. Therefore, in the event of an approval, a condition will be attached to require the provision of 10% wheelchair accessible units in more sensitively located positions.

*Secured by Design*

- 11.29 In terms of national planning policy, paragraphs 91-95 of the National Planning Policy Framework (2012) emphasise that planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. In doing so planning policy should emphasise safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.
- 11.30 The above strategic approach is further supplemented under Policy 7.3 of the London Plan which encompasses measures to designing out crime to ensure that developments reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. In local plan policy terms, policies CP17 and DC63 are consistent with these national and regional planning guidance. The SPD on Designing Safer Places (2010), forms part of Havering's Local Development Framework and ensures adequate safety of users and occupiers by setting out clear advice and guidance on how these objectives may be achieved and is therefore material to decisions on planning applications.
- 11.31 In keeping with these policies officers have consulted the Metropolitan Police to review the submitted application. They have commented that the application is acceptable subject to conditions stipulating that prior to the commencement of development the applicant shall be required to make a full and detailed application for the Secured by Design award scheme and thereafter adhere to the agreed details following approval. These conditions will be attached.

*Density*

- 11.32 The development proposal is to provide 197 residential units on a site area of 0.79ha which equates to a density of 249 units per ha. The site is an area with low-moderate accessibility with a PTAL of 2. Policy SSA12 of the LDF specifies a density range of 30-150 units per hectare; the London Plan

suggests a density range of between 35 and 170 dwellings per hectare depending upon the setting in terms of location (suggesting higher densities within 800m of a district centre or a mix of different uses). The Planning Framework suggests a density of between 100-120 dwellings per hectare.

- 11.33 However the density matrix does not represent a hard rule but rather a guidance to development. The high density need not represent an area of conflict on policy grounds. The Greater London Authority has issued guidance that whilst the London Plan Density Matrix provides direction on how site potential can be reached, density should not be applied mechanistically and without due consideration to other factors. Councils should take into account aspects such as the local context, design, transport capacity and social infrastructure.
- 11.34 In this case, the site is in fairly close proximity to shopping and public transport in Rainham district centre. The approach to the site has been designed, reflecting the existing tall buildings on site and providing for quality open space to be provided. In this particular instance, a density in excess of guidance is not considered to be harmful in itself.

### **Housing Mix**

- 11.35 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.
- 11.36 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.
- 11.37 The current application proposes a total of 197 residential units with a division of 44% one beds, 46% 2 beds and 10% 3 beds. This mix results in low levels of 3 bedroom family units and therefore fails to fully comply with the policy mix requirements. However unlike a number of these flatted developments, the

application proposes 10 duplex apartments at ground floor and first floor which are supported and encouraged.

11.38 While the policy mix is the Council's preferred approach, the supporting text requires that any short comings in these mixes could be mitigated with other benefits. It should also be noted that the supporting text to London Plan Policy 3.4 states "*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.*" Given the site's location and previous use the development would be considered to be of high density and therefore would be more suitable to smaller units. Therefore the proposed lower levels of family units is considered context driven for the site and location.

11.39 In addition, it should be noted that the existing units on site to be replaced are all one and two bedrooms units only. There are no family units. Therefore the proposed developments would better contribute to the type of housing mix supported by policy. See below breakdown.

	1+	2+	3+	4+	Total
<b>Proposed</b>					
Market	31	37	3		71
Social	56	53	17		126

<b>Existing</b>					
Market	5	5			10
Social	43	44			87

### **Affordable Housing**

11.40 Currently, the Council has an aspiration to achieve 50% of all new homes built as affordable and seeks a split of 70:30 in favour of social rented (policy DC6). London Plan Policy 3.11 states that affordable housing provision should be maximised, ensuring an average of 17,000 more affordable homes within London over the course of the Plan period. Policy 3.13 emphasises that Boroughs should normally require affordable housing provision on a site which has capacity to provide 10 or more homes. Policy 3.12 sets out that "negotiations on sites should take account of their individual circumstances including development viability and in support of this, the London Plan requires a tenure split of 60:40 in favour of affordable rented.

11.41 The Mayor of London's Supplementary Planning Guidance, Homes for Londoners (2017), states that it is essential that an appropriate balance is struck between the delivery of affordable housing and overall housing development. Under its "Fast Track Route" policy, it is required that

development land in public ownership or public use should be expected to deliver at least 50 percent affordable housing without a grant in order to benefit from the Fast Track Route.

11.42 The preferred tenure split as set out under policy CP2 of the London Borough of Havering's Local Development Framework (2008) is for 70% of affordable housing to be delivered as social/affordable rent and 30% as intermediate, to include London Living Rent and Shared Ownership.

11.43 The existing residential units on site total 97 of which 87 are social housing (90%). The proposed development would result in 64% affordable housing (126 units) with a split of 69% social rented and 31% affordable rent. This provision is in keeping with the minimum affordable housing units to be secured under such schemes. The proposed tenure mix is also largely policy compliant. Therefore the development would meet both LBH policies and the London Plan's. See below table:

Housing option	Unit numbers	Percentage of total
Private	71	36%
Social Rent	87	44%
Affordable Rent	39	20%
Total	197	

11.44 As the development is a Council lead scheme, there is a clear mandate to ensure that existing residents have a right to return. This must account for at least 97 units alone. At the same time, it is important to ensure these developments inject some economic capital into the Council's vehicle for housing development and regeneration in order to ensure sustainable housing for Havering. 64% affordable housing units are proposed, with some duplex housing forms.

11.45 For the reasons outlined above officers are satisfied that when considered against relevant policy the subject application would accord with key policy objectives in relation to affordable housing provision. These provisions will be secured by S106 planning obligations.

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

11.46 The Residential Design SPD states that new development should be designed such that there is no detriment to existing residential amenity through overlooking and/or privacy loss and dominance or overshadowing. Policy DC61 reinforces these requirements by stating that planning permission will not be granted where the proposal results in unacceptable overshadowing, loss of sunlight/daylight, overlooking or loss of privacy to existing properties.

- 11.47 The proposed blocks are bounded by Dunedin Road to its north and New Road to its south. To the west of the site are the properties at Blewitts Cottages and to the east are the school playing fields. The plot arrangements in Dunedin Road (to the west of the site) means that the rear gardens of the properties on that part of Dunedin Road actually face onto this road while the front of these houses face onto New Road. Opposite the site on Dunedin Road are two storey houses/maisonettes.
- 11.48 Concerns on the future amenity arrangements in the area have been raised by neighbour on the grounds that:
- The development would lead to the loss of privacy for existing neighbours
  - The proposed development would be of a larger scale than the existing blocks.
- 11.49 It does not follow that the development being of a larger scale than existing would render it automatically unacceptable. In relation to the loss of privacy, all three proposed buildings would sit closer to those properties at Dunedin Road as the building footprint moves closer than the existing towers. In relation to the north facing elevations, the window to window distance across Dunedin Road would be in excess of 17 metres. It is considered that at this distance, the degree of overlooking would not be excessive and is comparable to many existing street situations. In terms of outlook, this will change but it is not considered that the proposal at 1/3/4 storeys rising in height toward New Road to 7/9/10 storeys would appear unduly dominant given the distance from properties in Dunedin Road.
- 11.50 The boundary of the site adjoins Blewitts Cottage. Running along the rear garden boundary was a decked car park which has recently been demolished. The proposed Block A would be sited off the boundary by about 6 metres and in this respect there would be an improvement to the immediate outlook. However, beyond the boundary, the outlook from the garden and rear of the houses would undoubtedly change compared to the current view of the 13 storey towers. The highest parts of the proposed Block A at 7 storeys is approximately 20 metres from the side boundary of Blewitts Cottages and this is considered sufficient to minimise any significant loss of outlook. Window to window relationships would be at an oblique angle at a minimum of 28 metres and this is considered acceptable. The occupier of the neighbouring site has commented that the proposed bins would be too close to their property and that the proposed trees may cause potential subsidence and loss of sunlight to this property. The proposed Underground Refuse Storage (URS) bins would be over 12 metres away from this neighbour which is considered to be acceptable. The applicant's indicative landscape plan shows that the planting of shrubs and trees are proposed along the shared boundary with this property. However the exact position and type is to be conditioned.

Subsidence is not a planning matter, but a matter between the parties. Given that the most recent boundary was the first floor deck of a car park, replacement with landscaping is considered to be an improvement.

- 11.51 The applicant has submitted a sunlight and daylight study looking at the likely impact on the development on nearby residents. This concluded that given the stepped approach of the development and the position of the site, there would be minimal impact to local residents in the summer and winter in terms of overshadowing, sunlight and daylight. In light of this, officers consider that the proposed sunlight and daylight impacts are acceptable. This proposal would make no significant difference to neighbouring amenity.

**Comparable Overall building heights**

<i>Scheme</i>	<i>Height (meters)</i>
Existing towers	39.73
Current scheme Proposed Tri-Blocks	37.60

- 11.52 The applicant has commissioned a micro climate study which on the basis of a desktop assessment considers that the proposal will be no worse than existing in regard to wind conditions. However, it is considered that further modelling would be required to confirm this and a suitable condition is recommended.
- 11.53 Subject to the above, it is considered that the impact of the development in terms of neighbouring residential or indeed business occupiers would not be significant in terms of loss of residential amenity including daylight, overshadowing or loss of privacy.

**Environmental Issues**

- 11.54 The Environmental Health Officer has raised no objections in relation to any historical contaminated land issues, air pollution or noise. The Environment Agency has also been consulted and has confirmed that there are no objections to the proposals by way of environmental matters.
- 11.55 A Contaminated Land study was undertaken with details submitted under the application. This concluded that contamination levels at the site and any associated risk levels were considered “Moderate” to “Low”. It should also be noted that the site is brownfield land and currently benefits from residential use. However the Council’s Environmental Health Officer has commented that the report does identify the presence of some contaminants in the soil. Therefore some remediation and contamination works would be required to secure the site for future use. These will be secured via conditions.



- 11.56 The proposed development is located within an area of poor air quality which suffers from high concentrations of nitrogen dioxide. Therefore it has been designated as an Air Quality Management Area (AQMA). To safeguard against additional unnecessary impacts to air quality, conditions are recommended to mitigate future impacts during the construction and operational phases of the development, including details to protect the internal air quality of the buildings as well as a requirement for ultra-low carbon dioxide boilers.
- 11.57 In terms of noise, the existing residential unit housed 97 units. However it is difficult to determine the number of actual inhabitants. Nevertheless, the proposed scheme proposes an addition 100 units. Given the location of the site the likely increased noise would be most experienced by the units at Blewitts Cottage (6 metres away). Noise mitigation measures have been submitted under the noise report conducted by RBA Acoustics. These measures have been reviewed by the Noise Officer who has commented that they fail to provide sufficient details. Therefore the development would only be acceptable subject to conditions requiring further and more details residential noise prevention insulation and attenuation. These will be secured via condition.
- 11.58 The application site is located on the Thames and Ingrebourne River flood plain. It falls under Flood Zone 3. Flooding and drainage strategies have been submitted with the application and will be discussed in later sections. However the proposed methods have been accepted by the Environment Agency and the Flood Officer.

#### **Parking and Highways Issues**

- 11.59 Policies CP9, CP10 and DC32 require that proposals for new development assess their impact on the functioning of the road hierarchy. The overriding objective is to encourage sustainable travel and reduce reliance on cars by improving public transport, prioritising the needs of cyclists and pedestrians and managing car parking. A Transport Assessment has been submitted with the planning application as is required for all major planning applications.
- 11.60 Policy DC33 seeks to ensure all new developments make adequate provision for car parking. In this instance the application site is located within an area with a Public Transport Accessibility Level (PTAL) rating 2 (Poor) where 6b (Excellent) is the highest. The site is 15 minutes' walk to Rainham Station which provides train lines into Central London. There is also nearby access to bus routes to Romford, Hornchurch, Barking and Lakeside and other nearby centres. A comparative table of existing parking in the area is provided below:

#### **Vehicle Parking**

Type	Existing No.	Proposed No.	Difference
Cars	74	92	8
Disabled		10	10
Cycle		355	355

- 11.61 Car parking would be provided at ground floor of all Blocks. Block A-B would be linked at ground floor level and make provision for 76 car parking spaces, while 16 would be provided at Block C. Cycle parking is proposed for 355 bicycles. Ten parking spaces have been allocated for disabled parking, 6 at Blocks A-B and 4 in Block C. No specific spaces have been allocated for electrical vehicles at present. A condition requiring 20% passive and 20% active electrical charging points in line with the London Plan will be attached.
- 11.62 Neighbour comments have been received on the grounds that the proposed development would lead to increased parking pressures in the area with the development only proposing 97 spaces (the application actually proposes 92 spaces). Neighbours have also commented that the development would increase traffic along Cherry Tree Road.
- 11.63 In support of the application, the applicant has undertaken a survey of parking availability in the surrounding area. Based on overnight surveys, it was found that, except for Evansdale, no streets suffered from significant levels of parking stress. Dunedin Road was found to have 50 cars parked where there is capacity for 167 spaces; New Road 17 cars parked where there is capacity for 30 spaces; Gisborne Gardens 9 cars parked where there is capacity for 21 spaces; Queenstown Gardens 14 cars parked where there is capacity for 24 spaces; New Zealand Way 39 cars parked where there is capacity for 77 spaces. Overall it was found that there was capacity for up to 448 parking spaces in streets surrounding the site with 156 cars parked (35% stress). Given the availability of parking in surrounding streets, it is considered that there are no grounds to object on grounds of shortfall of on-site parking provision.
- 11.64 Transport for London have been consulted and have raised no objections. The Greater London Authority has also commented in its Stage 1 comments that the proposed cycle storage and car parking facilities are of an acceptable level. The applicant has provided a Travel Plan with the application which is welcomed. A condition will be attached to require the appointment of a Travel Plan Co-ordinator prior to occupation with the aim of encourage sustainable methods of transport for occupiers and visitors. The Travel Plan will also be secured via condition and be reviewed annually for a period of five years following occupancy.

- 11.65 The site would benefit from the proposed introduction of the Beam Parkway linear park which is proposed for the area. Part funding for the linear park is sought from developer contributions based on the length of frontage along New Road. In this particular case, the applicable amount is £154,407, to be secured by legal agreement.
- 11.66 Policy DC32 of the LDF seeks to ensure that development does not have an adverse impact on the functioning of the road network. Policy DC33 seeks satisfactory provision of off-street parking for developments. Policy DC2 requires that parking permits be restricted in certain circumstances for occupiers of new residential developments. Officers consider that given the likely number of new homes planned for the area, it would be beneficial for the existing streets to be subject to Controlled Parking Zone (CPZ) restrictions and for new developments to be subject to restrictions preventing occupiers from obtaining permits. In this case, it is recommended that a contribution be secured for CPZ implementation as well as parking permit restriction. If a CPZ is introduced, it would minimise conflict between existing and future residents over parking.
- 11.67 The applicant has agreed to the above sums. The Local Highway Authority has raised no objection subject to the applicant entering into a Legal Agreement to prevent future occupiers from applying for parking permits. Subject to the completion of this agreement and the attached planning conditions, the proposal would be acceptable in highway terms and it is not considered that the proposed development would result in parking or highway safety issues. The legal agreement would be consistent with the other residential developments within this area.
- 11.68 The application proposes an Underground Refuse System (URS). This system is in keeping with the London Borough of Havering's future aspirations for sustainable methods for refuse in the Borough. The refuse containers will have capacity for 5000L and there will be 13 at the edges of the site. In addition, for large goods there will be a refuse storage area at Block A. A condition securing the refuse management plan will be attached to any permission to ensure the details for how this will be managed are brought forward for review by officers. Lastly, a Construction Management Plan condition is recommended to be attached to ensure neighbouring amenity is safeguarded and the highway network is not prejudiced.

### **Sustainability**

- 11.69 In recognising the importance of climate change and the need to meet energy and sustainability targets, as well as the Council's statutory duty to contribute towards the sustainability objectives set out within the Greater London Authority Act (2007), Policy 5.2 of the London Plan requires all major developments to meet targets for carbon dioxide emissions. This is targeted

the eventual aim of zero carbon for all residential buildings from 2016 and zero carbon non-domestic buildings from 2019. The policy requires all major development proposals to include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy.

11.70 The Mayor of London's SPG on *Housing* (2016) applies a zero carbon standard to new residential development, and defines zero carbon homes as homes forming part of major development applications where the residential element of the application achieves at least a 35 percent reduction in regulated carbon dioxide emissions (beyond Part L 2013) on-site. Furthermore, the Mayor of London's SPG on Sustainable Design and Construction (2014) provides guidance on topics such as energy efficient design; meeting carbon dioxide reduction targets; decentralised energy; how to off-set carbon dioxide where the targets set out in the London Plan are not met.

11.71 In terms of the Local Plan policy DC50 (Renewable Energy), there is a need for major developments to include a formal energy assessment showing how the development has sought to ensure that energy consumption and carbon dioxide emissions are minimized applying the principles of the energy hierarchy set out in the London Plan.

11.72 A Sustainability and Energy Report has been submitted and reviewed by officers. This has been undertaken to satisfy the following requirements:

- To demonstrate how the development shall reduce the carbon emissions by at least 35% over a similar gas heating system in relationship to Building Regulations Part L1A 2013 as required by the London Plan.

11.73 The approach to sustainable development is to improve the energy efficiency of the building beyond the requirements of Building Regulations. This follows the most recognised method of achieving sustainability through the energy hierarchy:

- Energy conservation – changing wasteful behaviour to reduce demand.
- Energy efficiency – using technology to reduce energy losses and eliminate energy waste.
- Exploitation of renewable, sustainable resources.
- Exploitation of non-sustainable resources using CO<sub>2</sub> emissions reduction technologies.
- Exploitation of conventional resources as we do now.

- 11.74 To demonstrate viability the appraisal highlights that at this stage a 32% carbon reduction can be achieved on average across the whole development through the improvements to fabric efficiency, energy reduction, Photovoltaic panels, a brown roof and other renewable energy. However this is below the required 35% stated under the London Plan. The GLA have commented that although this is slightly lower than required they are satisfied that there is "...little further potential for carbon dioxide reductions onsite. Accordingly, the remaining regulated carbon dioxide emission reductions should be met through a Section 106 contribution to the Council's offset fund in order to meet the zero carbon target." In light of this officers accept the lower provision and will secure the remaining 75% by S106 off site contributions charged at £60 per tonne.
- 11.75 Policy 5.3 of the London Plan seeks that developers utilise the highest standards of sustainable design and construction to be achieved to improve the environmental performance of new developments. Guidance of how to meet the requirements as presented from the above policy is further discussed within SPD Sustainable Design Construction (2009). This encourages developers to consider measures beyond the policy minimum and centred around development ratings, material choice, energy and water consumption.
- 11.76 Policy 5.9 of the London Plan emphasises that major development proposals should reduce potential overheating and reliance on air conditioning systems
- 11.77 The development incorporates a large sustainable green roof. This would mitigate water runoff and sewer overflow by absorbing and filtering water that would normally be directed to gutters, increasing volume during wet weather. The green roof will also add to a greener air flow in the location by removing air particulates and producing oxygen.
- 11.78 In recognising the need to protect and conserve water supplies and resources a series of measure and guidance has been provided under Policy 5.15 on of the London Plan where it stresses that planning decisions should seek development to minimise the use of mains water by incorporating water saving measures and equipment and designing residential development so that mains water consumption would meet a target of 105 litres or less per person per day. This is supplemented under Standard 37 from the Mayor of London's SPG on *Housing* 2016, the target set out in this standard is in line with the lower optional maximum water consumption requirement which is set out in Part G of the Building Regulations from October 2015.
- 11.79 Policy DC51 highlights the need for applicants, as a minimum, to incorporate a high standard of water efficiency which can include greywater and rainwater

recycling to help reduce water consumption. Therefore a condition will be attached to ensure the 105 litre target is maintained.

### **Flooding and Drainage**

- 11.80 Guidance under the NPPF seeks to safely manage residual risk including by emergency planning and give priority to the use of sustainable drainage systems.
- 11.81 In order to address current and future flood issues and minimise risks in a sustainable and cost effective way Policy 5.12 of the London Plan emphasises that new developments must comply with the flood risk assessment and management requirements and will be required to pass the Exceptions Test addressing flood resilient design and emergency planning as set out within the NPPF and the associated technical Guidance on flood risk over the lifetime of the development. Furthermore, Policy 5.13 of the London Plan stresses that development should utilise sustainable urban drainage systems (SUDS) and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 11.82 In terms of local planning policies, policy DC48 emphasises that development must be located, designed and laid out to ensure that the risk of death or injury to the public and damage from flooding is minimised whilst not increasing the risk of flooding elsewhere and ensuring that residual risks are safely managed. The policy highlights that the use of SUDS must be considered. Further guidance of how to meet the requirements as presented in the Core Strategy is supplemented under LBH's SPD on '*Sustainable Design Construction*' 2009 which encourages developers to consider measures beyond the policy minimum and centred on Flood risk.
- 11.83 Policy DC51 seeks to promote development which has no adverse impact on water quality, water courses, groundwater, surface water or drainage systems. Whilst policy CP15 (Environmental Management Quality) seeks to reduce environmental impact and to address causes of and to mitigate the effects of climate change, construction and new development to reduce and manage fluvial, tidal and surface water and all other forms of flood risk through spatial planning, implementation of emergency and other strategic plans and development control policies; whilst having a sustainable water supply and drainage infrastructure.
- 11.84 The application site is located approximately 300m from Ingrebourne Marshes SSSI site, and 700m from Inner Thames Marshes SSSI. The site is within Flood Zone 3 (most at risk of flooding). Foul water will discharge to Thames Water's sewer network. Surface water is also proposed to be discharged into

existing sewers. Policy 5.13 of the London Plan states that developments should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so and applicants should aim for greenfield run-off rates.

- 11.85 The applicant has given insufficient details for SUDs in their submission contrary to the policy requirements. Accordingly, a condition in that regard is recommended to ensure a surface water strategy is in place prior to the completion of the development which incorporates measures such as rain water harvesting. In addition, insufficient information has been submitted in regards to podium gardens or green roof. Therefore it is considered expedient that these be reviewed following consent and subject to planning condition.

### **Community Infrastructure Levy**

- 11.86 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 17,192 square metres. Therefore a mayoral levy of £429,800 is applicable, subject to any relief for social housing and/or existing floorspace.
- 11.87 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 levy is £2,149,000, but this would be subject to relief for social housing and/or existing floorspace.

### **FINANCIAL AND OTHER MITIGATION**

- 12.1 Policy DC72 of the LDF emphasises that in order to comply with the principles as set out in several of the Policies in the Plan, contributions may be sought and secured through a Planning Obligation. Policy 8.2 of the London Plan states that development proposals should address strategic as well as local priorities in planning obligations.
- 12.3 The Rainham and Beam Park Planning Framework seeks to deliver a new Beam Parkway linear park along the A1306 including in front of this site and seeks developer contributions for those areas in front of development sites. The plans are well advanced and costings worked out – based on the frontage of the development site to New Road, the contribution required for this particular site would be £154, 407.18. This is necessary to provide a satisfactory setting for the development rather than the stark wide New Road.

- 12.4 From a sustainability perspective, the proposal is accompanied by a Sustainability Statement and Energy Statement. The reports outline an onsite reduction in carbon emissions by 32%, to include a photovoltaic strategy which aims to further reduce CO2 emissions across the entire site. As the requirements are for 100% reduction, this would result in a shortfall of 68%. Therefore the Mayors calculation of a financial contribution of £60 per tonne in lieu of on-site carbon reduction measures is applicable. In the event of an approval and in compliance with the hereby attached conditions a final sum will be calculated. The mechanism for this will be secured via a S106 legal agreement in accordance with Policy 5.2 of the London Plan.
- 12.5 In light of the above and discussions in other parts of this report the proposal would attract the following section 106 contributions to mitigate the impact of the development:
- Affordable Housing 64% to be delivered with a tenure split of 70:30 between social rent and affordable rent.
  - Affordable housing rent levels secured and early and late Stage Viability Review Mechanisms attached.
  - Linear Park contribution sum of £154,407
  - Carbon offset fund contribution in respect of shortfall of the residential units to achieve a 100% reduction in carbon dioxide emissions compared to Part L of the Building Regulations 2013, such sum calculated at sixty pounds (£60.00) per tonne that falls below the 100% threshold, for a period of 30 years, duly Indexed, and the commercial units; and in respect of the commercial units to achieve a 35% reduction in carbon dioxide emissions compared to Part L of the Building Regulations 2013, such sum calculated at sixty pounds (£60.00) per tonne that falls below the 35% threshold, for a period of 30 years, duly Indexed
  - Job Brokerage 4 per 10,000spm of development
  - Traffic Management contribution of £10,000, Indexed. For the review of waiting and loading restrictions on loading restrictions on New Road.
  - On-street cycle parking contribution of £15,000 for the provision of cycle parking in the vicinity of the site, Indexed.
  - Restriction on obtaining parking permits for residential, retail and commercial occupiers.
  - Controlled Parking Zone contribution £22,064 (£112 per unit).
  - Travel Plan (including the appoint of a Co-ordinator)
  - Enter into a PPA with the LPA for the discharge of conditions.
  - Reasonable legal fees for the drafting and negotiation of the deed whether or not it goes to completion
  - Monitoring fee towards the Council costs of monitoring compliance with the deed



- Any other planning obligation(s) considered necessary by the Assistant Director Planning

12.6 It should be noted that the above figures may change should there be any amendment to the scheme.

## **CONCLUSIONS**

- 13.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires the Council to determine any application in accordance with the statutory development plan unless material considerations indicate otherwise. All relevant policies contained within the Mayor's London Plan and the Development Plan, as well as other relevant guidance and material considerations, have been carefully examined and taken into account by the Local Planning Authority in their assessment of this application.
- 13.2 The preliminary proposals for the site were subject to consideration by the Quality Review Panel and Strategic Planning Committee and comments made in these forums have had some input into the development. The proposal would not significantly affect the amenities of neighbouring residential properties. It would provide for much needed quality housing, including 126 affordable units, all with a good standard of accommodation including outlook, privacy and access to daylight.
- 13.3 As conditioned, the proposal would not compromise the character of the locality or any nearby historic environments or buildings. It accords with the relevant development plan policies and conforms to the design principles and parameters established by the Council's policies.
- 13.4 The design of the development is considered appropriate for its location, which also provides for a good level of variety and legibility in the built form. The materials, layout and building form relates well to the surrounding area resulting in a development that would be aesthetically pleasing subject to conditions securing detailed material elements of suitable quality.
- 13.5 In light of the above, the application is **RECOMMENDED FOR APPROVAL** in accordance with the resolutions and subject to the attached conditions and completion of a legal agreement.

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