



## STRATEGIC PLANNING COMMITTEE AGENDA

<b>7.00 pm</b>	<b>Thursday 17 June 2021</b>	<b>Council Chamber, Town Hall, Main Road, Romford RM1 3BD</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  
taiwo.adeoye@onesource.co.uk**

**To register to speak at the meeting please call 01708 433100  
Before Tuesday 15 June 2021**

## **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.

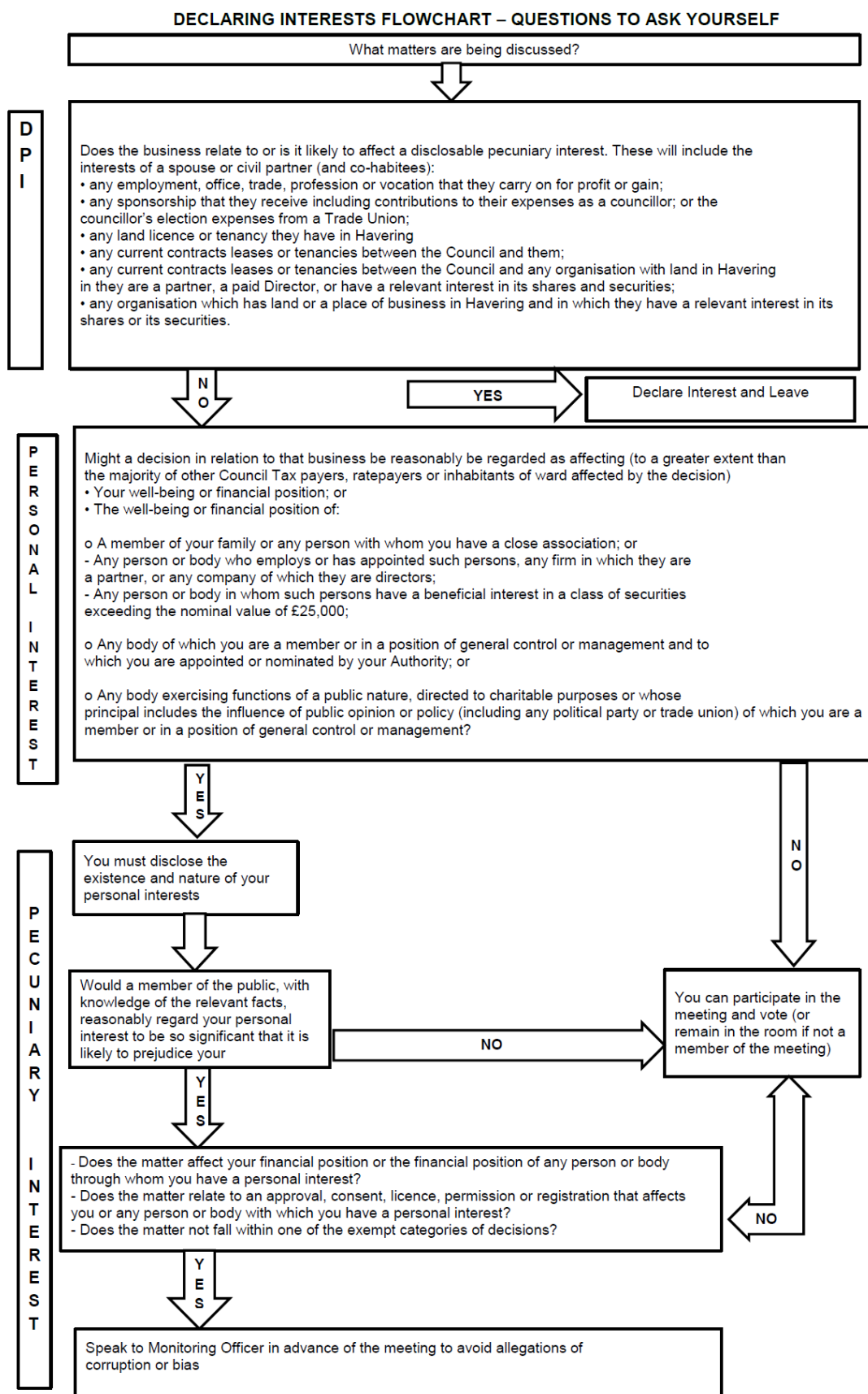
Reporting means:-

- 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 MEETINGS OF THE STRATEGIC PLANNING COMMITTEE - ADVICE RE ATTENDING DURING THE COVID-19 PANDEMIC (Pages 1 - 2)**

Document attached

### **2 CHAIRMAN'S ANNOUNCEMENTS**

The Chairman will make his announcement including the protocol for the meeting during the Covid-19 pandemic restrictions.

#### **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 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.

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

(if any) - receive.

### **4 DISCLOSURE OF INTERESTS**

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

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

### **5 MINUTES (Pages 3 - 4)**

To approve as a correct record the minutes of the meeting of the Committee held on 27 May 2021 and to authorise the Chairman to sign them.

### **6 APPLICATIONS FOR DECISION (Pages 5 - 8)**

Report attached.

- 7 P0761.20 - WATERLOO ESTATE, LAND BOUND BY WATERLOO ROAD TO THE EAST, THE EASTERN MAIN LINE TO THE SOUTH, COTLEIGH ROAD TO THE WEST LONDON ROAD TO THE NORTH** (Pages 9 - 66)

Report attached.

- 8 P0883.20 - HAVERING COLLEGE OF FURTHER AND HIGHER EDUCATION TRING GARDENS** (Pages 67 - 116)

Report attached.

- 9 P1022.20 - FORMER RTS MOTORS, 84-86 NEW ROAD, RAINHAM RM13 8DT** (Pages 117 - 170)

Report attached.

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

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## MEETINGS OF PLANNING AND STRATEGIC PLANNING COMMITTEES – ADVICE RE ATTENDING DURING THE COVID-19 PANDEMIC

During the period of the Covid-19 restrictions, and in order to maintain social distancing, all interested parties should be aware that only very limited numbers of people will be permitted to physically attend the meetings at Havering Town Hall. Attendees will be limited to the Members of the Committee, certain officers required to be present and a maximum of two members of the public. All other parties required to address the Committee (applicant, registered objectors, ward Councillors etc) should continue to access the meeting via the Zoom link provided by the clerk and not attend the Town Hall in person.

Members of the public should be aware that, if they are present in the meeting room, they will not have any opportunity to address the meeting. Members of the public who have registered as objectors etc to an application will be given details of a Zoom link by which they will be able to address the meeting remotely. Any members of the public who wish to attend the Town Hall to observe proceedings only must pre-book this via the Planning Desk (calling 01708 433100). As stated, the requirement to maintain social distancing means that a maximum of two people may attend the Town Hall to observe the meeting. A webcast of the meeting will continue to be available via the Council's website – [www.havering.gov.uk](http://www.havering.gov.uk)

All attendees should be aware that face coverings must be worn at all times in the Town Hall and should only be removed if addressing the meeting. In order to reduce the risk of transmission, no refreshments of any kind will be available at the meeting and attendees should therefore ensure they bring with them sufficient supplies of water etc to the meeting and that this is taken away with them afterwards. Hand sanitiser is available at the entrance to the meeting room and should be used by everyone attending the meeting.

For any further enquiries, please contact  
[taiwo.adeoye@onesource.co.uk](mailto:taiwo.adeoye@onesource.co.uk)

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**MINUTES OF A MEETING OF THE  
STRATEGIC PLANNING COMMITTEE  
Council Chamber - Town Hall  
27 May 2021 (7.00 - 7.45 pm)**

**Present:**

**COUNCILLORS 8**

<b>Conservative Group</b>	Dilip Patel (Chairman), Timothy Ryan (Vice-Chair), Ray Best and Maggie Themistocli
<b>Residents' Group</b>	Stephanie Nunn
<b>Upminster &amp; Cranham Residents' Group</b>	Linda Hawthorn
<b>Independent Residents Group</b>	Graham Williamson
<b>Labour Group</b>	Keith Darvill

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

**108 DISCLOSURE OF INTERESTS**

There were no disclosures of interest.

**109 MINUTES**

The minutes of the meeting held on 22 April 2021 were agreed as a correct record and would be signed by the Chairman at a later date.

**110 P0242.21 - BEAM PARK BLOCK T**

The application before the Committee related to the Beam Park development within Rainham which encompasses a site that straddles both the London Borough of Havering and the London Borough of Barking and Dagenham with originally a single planning permission issued by the Greater London Authority (GLA) covering the site.

The Committee considered the report and **RESOLVED** that **PLANNING PERMISSION BE GRANTED** subject to a Deed of Variation to the original S106 and subject to any direction from the Mayor of London.

111 **QUARTERLY PLANNING PERFORMANCE UPDATE REPORT**

The Committee considered the reporting of performance to the planning committees and **RESOLVED** to note the contents of the report.

Members were directed to forward any follow-up enquiry to the Head of Strategic Development.

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**Chairman**

## Agenda Item 5

### **Applications for Decision**

#### **Introduction**

1. In this part of the agenda are reports on 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 Adopted March 2021
  - 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 where there are registered public speakers:

- a. Officer introduction of the development
  - b. Registered Objector(s) speaking slot (5 minutes)
  - c. Responding Applicant speaking slot (5 minutes)
  - d. Ward Councillor(s) speaking slots (5 minutes)
  - e. Officer presentation of the material planning considerations
  - f. Committee questions and debate
  - g. Committee decision
16. The items on this part of the agenda will run as follows where there are no public speakers:
- a. Where requested by the Chairman, officer presentation of the main issues
  - b. Committee questions and debate
  - c. Committee decision

**Late information**

17. 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**

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

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 <b>Havering</b> LONDON BOROUGH	<b>Strategic Planning Committee 17 June 2021</b>
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<b>Application Reference:</b>	<b>P0761.20</b>
<b>Location:</b>	<b>Waterloo Estate, land bound by Waterloo Road to the east; the Great Eastern Main Line to the South Cotleigh Road to the west London Road to the North</b>
<b>Ward:</b>	<b>Romford Town</b>
<b>Description:</b>	<b>Hybrid (part outline, part detail) planning application for the demolition and redevelopment of the site to provide up to 1,380 (C3) residential units (40% affordable), built over 3-16 storeys, flexible commercial floorspace (Use Class A1-A4, B1, D1/D2), community floorspace, open space and associated public realm improvements, parking, play space, highways improvements and central cycle route. Outline with all matters reserved (except access) and Detailed Full Planning for Phase 1.</b>
<b>Case Officer:</b>	<b>John Kaimakamis</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 SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- 1.1 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 development that would make an important contribution to housing delivery within the Borough by securing up to 1380 units with 40% affordable housing units. The application is supported by the Greater London Authority (GLA) and the LBH's housing divisions as it would contribute to the housing demand in the Borough.
- 1.2 The approach to site layout, height and massing represents an acceptable approach given the location of the site. This initial scale and design was also reviewed by Members of the Strategic Planning Committee and the Council's Quality Review Panel.
- 1.3 Although the maximum parameters (as revised) of this hybrid planning application would result in a moderate level of 'less than substantial harm' to the setting of designated heritage assets (Grade II listed St. Andrew's Church and Salem Chapel), it is considered that the level of public benefit provided by the proposals outweighs the 'less than substantial harm' to the heritage assets. The public benefits include a significant uplift of 1090 (net increase) in the total number of residential units on the estate including 212 social rented units, 197 affordable rent units and 147 intermediate units. Other benefits include the provision of modern residential accommodation, improved design quality of the streets and public open spaces, associated pedestrian and cycle improvements and reprovision of community facilities. St. Andrew's Church, an existing landmark, will form the focus of the development on one side of the intersection of the streets and a new public open park fronted by active community uses on the other side.
- 1.4 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.

## **2 RECOMMENDATION**

- 2.1 That the Committee resolve to GRANT planning permission subject to:

Any direction by the London Mayor pursuant to the Mayor of London Order, and the prior completion of a Legal Agreement pursuant to s106 of the Town and Country Planning Act 1990 (s amended) and all other enabling and other enabling powers, with the following Heads of Terms:



- Early, mid and late Stage Viability Review Mechanisms attached.
- Affordable housing split 60:40 (units 824:556), consisting of Social Rent (212 units), Affordable Rent (197 units) and Intermediate (147 units).
- Phasing of Affordable housing delivery
- Affordable housing rent levels secured
- Shared ownership units maximum combined income £90,000
- Shared ownership annual housing cost no more than 40% of value
- Affordable housing breakdown and unit location
- Carbon offset fund contribution in respect of shortfall 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,
- Job Brokerage 4 per 10,000spm of development
- Travel Plan (including the appointment of a Co-ordinator)
- Highways contribution for the creation of a CPZ.
- Contribution to Cotton's Park improvement given shortfall in designated child's play space
- Employment and training
- Active transport contribution towards the review and improvement of cycling access, parking and pedestrian access around the site and in Romford Town Centre, including contribution to Liveable Neighbourhoods improvement t the ring road, Indexed.
- On-street cycle parking contribution
- Car free restriction on obtaining parking permits to be secured by agreement pursuant to Section 16 of the Greater London Council (General Powers) Act 1974
- Reasonable legal fees for the drafting and negotiation of the deed whether or not it goes to completion
- S106 monitoring fee towards the Council costs of monitoring compliance with the deed

2.2 That the Assistant Director of Planning is delegated authority to negotiate the legal agreement indicated above and that if not completed by the 30th September 2021 the Assistant Director of Planning is delegated authority to refuse planning permission or extend the timeframe to grant approval.

2.3 That the Assistant Director of Planning is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

### **Conditions**

1. Time Limit
2. Reserved Matters to be Submitted
3. Timing of Reserved Matters Submission

4. Timing of Reserved Matters Commencement
5. Approved Plans
6. Approval of Reserved Matters
7. Phasing Plan
8. Design Code
9. Dotted Line Parameter Plans (Blocks 09 and 10)
10. Existing and Proposed Site levels
11. Maximum number of residential units (1380)
12. Partial Discharge – Allows for Phasing of development
13. Approval of Materials
14. Access to Phases
15. Accessibility and Management Plan - Residential
16. Accessibility and Management Plan- Non-Residential
17. Accessibility of Public Realm
18. Car and cycle park design management plan
19. Occupier Cycle Parking
20. Visitor Cycle Parking
21. Travel Plan
22. Compliance with Design Code
23. Secure by Design
24. Accessibility and Adaptability
25. Provision of Amenity Space
26. Refuse Storage and Segregation for Recycling
27. Carbon Reduction- Residential
28. Carbon Reduction- Non-Residential
29. Energy compliance
30. Photovoltaic panels – Energy hierarchy
31. Energy Efficiency
32. Overheating – Phases 2 - 5
33. Overheating – Phase 1
34. Urban Greening Factor
35. Ecological Appraisal, Bat Survey Report and Environmental Statement
36. Biodiversity Enhancement Strategy
37. Wildlife Sensitive Lighting Design Operational Scheme
38. Landscape and Ecological Management Plan
39. Further Surveys for Developments Phased over a Long Period
40. Landscaping, public realm, play space and boundary treatments
41. Living Roofs
42. Nesting Birds and Bat Roosts
43. Protection of Trees
44. Vegetation Clearance
45. Examination of Trees for Bats
46. Air Quality Assessment
47. Boiler and Combined Heat Power
48. Noise and Vibration (A3 or A4 use)
49. Kitchen Ventilation Equipment
50. Noise Assessment (Scheme of Glazing, Ventilation and Control for Thermal Comfort)
51. Sound Insulation

- 52.Noise levels from plant and machinery
- 53.Noise from Commercial Units
- 54.Noise from Entertainment
- 55.Hours of Operation- Non-Residential – 0700 to 2300 (Deliveries 0700 to 2100)
- 56.Hours of Operation- Outdoor Sports – 0700 to 2200
- 57.Lighting Strategy- South Corridor
- 58.Flood Risk
- 59.Sustainable Urban Drainage
- 60.Drainage Strategy
- 61.Drainage Maintenance
- 62.Piling Method Statement
- 63.Non-Road Mobile Plant and Machinery (“NRMM”)
- 64.Oil Interceptors
- 65.Contamination Remediation Scheme
- 66.Unexpected Contamination
- 67.Construction Environmental Management Plan
- 68.Demolition and Construction Hours(8am to 6pm Mon-Fri, 8am to 1pm Sat, none Sunday and Bank Holidays)
- 69.Piling Vibration
- 70.Foundation Design
- 71.Permitted Development
- 72.Satellite Dishes
- 73.Fire Safety
- 74.Bird Hazard Management Plan
- 75.Outline Delivery and servicing plan for residential uses
- 76.Outline- Delivery and servicing plan non-residential uses
- 77.Daylight\sunlight
- 78.Glare
- 79.Cranes
- 80.Parking
- 81.Phase 1 - Delivery and servicing plan for residential uses
- 82.Phase 1 - Delivery and servicing plan for non-residential uses
- 83.Phase 1 energy strategy
- 84.Archaeology (Written Scheme of Investigation)
- 85.Archeology (Display and Interpretation)

#### Informatives

1. Planning obligations
2. Phases planning permission
3. Street naming and numbering
4. Thames Water
5. Lighting
6. Environmental Health – Gas
7. Written scheme of investigation
8. London Fire Bridge
9. Network Rail
- 10.Contaminated land

11. Refuse
12. Deemed discharge
13. Precommencement conditions
14. Highway legislation
15. Temporary use of the public highway
16. Adoption of roads
17. Surface water management
18. Highway approval required
19. Secure by design
20. Community Infrastructure Levy (CIL)
21. NPPF positive and proactive

### **3. SITE AND SURROUNDINGS**

- 3.1 The application site covers an area of approximately 4.5 hectares and is commonly known as the Waterloo and Queen Street Estate. The site is bounded by London Road to the north, by Waterloo Road (A125) to the east, a railway line to the south and Cotleigh Road to the west.
- 3.2 The existing site previously comprised of 290 residential homes, as the site has been decanted but the buildings still stand. The homes were broken down as follows:
  - Waterloo Estate – total 242 residential units (general needs) comprising 171 Council tenants (social rented affordable housing and 77 leasehold and freehold units (private tenure);
  - Queen Street Older Persons Housing – total 31 residential units; and
  - Hostels Unit – total of 12 temporary accommodation residential units.
- 3.3 In addition to the above, the estate also comprised of the Prince Albert Public House, the St. Andrew's Parish Community use building, areas of surface car parking and amenity green space, a multi-use games area (MUGA) and a small playground.
- 3.4 The above uses and residential units within the estate were contained within various building typologies which included two-storey houses and flats, three-storey blocks of flats, four-storey stacked maisonettes, as well as two 11-storey residential towers (Thomas England House and William Pike House).
- 3.5 The site is bounded by 2 storey semi-detached housing to the west, 2-4 storey commercial buildings to the north and the A125 dual carriageway to the east, the ring road which effectively encloses Romford town centre. On the opposite

side of the A125 is the prominent flank elevation of the Brewery retail development and associated car park. To the south is a steep embankment and the railway used by a range of services including Shenfield to London Liverpool Street (Crossrail). The railway embankment is designated in the council's Local Plan as a Site of Importance for Nature Conservation (SINC) of Borough Importance.

- 3.6 The site does not fall within a conservation area and there are no listed buildings on site. However there are 2 Grade II listed buildings adjacent to the site (St Andrews Church and Salem Baptist Chapel) located at the western and northern edges of the applications site.
- 3.7 The land adjacent to the railway is within an Archaeological Priority Area. Romford Train Station is within walking distance and there are a number of bus routes on Waterloo Road and London Road. The PTAL for the site ranges between 2(Poor) and 6a (Excellent).
- 3.8 The site also falls within an Air Protection Zone.

## **4 PROPOSAL**

- 4.1 The application seeks hybrid planning permission (part outline, part detail) for the demolition and redevelopment of the Waterloo and Queen Street Estate site to provide up to 1,380 (C3) residential units (40% affordable), up to 1.375 square metres of flexible commercial floorspace (Use Class A1-A4, B1, D1/D2), and up to 550 square metres of community floorspace (Use Class D1).
- 4.2 The full planning permission (detailed part) sought covers Phase 1 within the south eastern corner of the site with the erection of two blocks (Blocks 1 and 2) which range in height between 6 and 16-storeys, and comprises of 370 residential units and 475 square metres of flexible floorspace.
- 4.3 The outline planning permission sought covers Phase 2-5 for the remaining part of the site with the erection of 8 further blocks (Blocks 3-10) ranging in heights from single storey to 14-storeys. The remaining quantum of flexible floorspace is to be used by Use Classes A1, B1, D1 and D2.
- 4.4 The outline part of the scheme is covered by a Development Specification Document, Parameter Plans and a Design Code, which subsequent Reserved Matters Applications will require to comply with. Parameter Plans cover matters in relation to development zones, ground floor land uses, access and movement, maximum heights and landscaping areas.

- 4.5 As originally submitted, the application was accompanied by an illustrative masterplan and indicative phasing to demonstrate how the scheme could be brought forward in line with the specifications and requirements of the originally submitted maximum parameters and design code.
- 4.6 Following concerns raised by officers regarding the disproportionate flexibility between the originally submitted parameter plans and illustrative masterplan, the application was revised so that the originally submitted illustrative masterplan became the amended maximum parameters for the proposal. These are referred to as 'maximum parameter plans (as revised)' from here onwards within this report and the officer assessment below is conducted on the basis that these are the formally submitted parameter plans.
- 4.7 Additionally, following concerns raised by officers with regard to the demonstrable negative impact Blocks 09 and 10 (on the basis of the maximum parameters as revised) would have on the amenity of neighbouring properties in Cotleigh Road, the applicant submitted further illustrative proposals with dotted lines of Blocks 09 and 10 with reduced heights and massing to address these concerns. These are referred to as 'dotted line parameters of an illustrative proposal for Blocks 09 and 10' from here onwards within this report.

## 5 PLANNING HISTORY

- 5.1 The following planning applications are relevant to the site:
- **Z0004.18:** Request for Environmental Impact Assessment Screening Opinion – Screening opinion issued 15 August 2018 that EIA would be required.
  - **Z0012.18:** Request for an Environmental Impact Assessment Scoping Opinion – Scoping opinion issued 28 February 2019.
  - **F0011.20:** Prior approval for the demolition of buildings at land bound by Waterloo Road to the east; the Great Eastern Main Line to the south Cotleigh Road to the west; and London Road to the north. Prior Approval Consent granted 04 March 2020.
  - **P1187.20:** Demolition of Nos. 67-69 London Rd, the Prince Albert Public House and associated structures, construction of a new vehicular access to London Road and associated works. Planning Permission granted 08 March 2021.

- 5.2 The following planning applications are relevant to Havering's wider estate regeneration programme:

Napier House and New Plymouth House, Dunedin Road

- **P0751.19:** 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. Planning permission granted 06 April 2020.
- **P1464.20:** Section 73 Application (Minor Material Amendment) to vary Condition 2 (Approved Plans) of Planning Permission Reference P0751.19 dated 06 April 2020 for the 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. The minor material amendments sought are to make external changes to the external appearance of the building, layout and landscaping. Planning Permission granted 27 April 2021.

Solar Court, Serena Court, Sunrise Lodge, Sunrise Avenue.

- **P1809.19:** Demolition of existing buildings, construction of five buildings built over 3-10 storeys comprising 175 residential units including ancillary communal facility (Class C3), associated car & cycle parking, landscaping and other associated works. Planning Permission granted 27 April 2021.

## 6 STATUTORY CONSULTATION RESPONSE

- 6.1 A summary of consultation responses are detailed below:

- **Historic England (GLASS):** Conditions are recommended for staged archaeological fieldwork, pre-demolition recording of the pub and a scheme of heritage interpretation and display in the final development.
- **Transport for London:** 640 cycle paces and 11 short stay spaces meet the required London plan minimum. 20% to be in Sheffield stands at normal spacing. Concern at higher level of car parking provision given part of the site is in PTAL 6a. 80 car spaces allocated for disabled use and concern that this could be misused for normal parking use. Car Parking and Design Management Plan should be secured by condition. Permeability between

land parcels to be improved to create better links with Waterloo Rd, town centre station and bus stops. Travel Plan, Construction Logistics Plan and Delivery and Servicing Plan to be secured via condition.

- **Greater London Authority (Stage 1):** The proposals are broadly supported in principle but further information and clarifications are required to ensure compliance with the London Plan. These matters relate to estate regeneration, land use principle, housing and affordable housing, urban design and heritage, climate change and transport. In addition the below should be secured under a S106:
  - Early implementation, mid and late stage review mechanisms should be secured for the affordable housing units.
  - Annual housing cost (including servicing charges, rent and any interest payments) should be secured as no greater than 40% of the housing cost.
  - Overheating checklist and dynamic heating analysis is acceptable.
  - The approach to urban greening has been maximized within the proposed development
  - A Fire Strategy should be secured
  - A Travel Plan
  - Therefore the development is acceptable subject to further details conditions and a Draft S106 agreement.
- **Environment Agency:** No objection.
- **London Underground:** No comments.
- **Network Rail:** No representation received.
- **Thames Water:** No objection subject to Ground Water Risk Permit informative.
- **Natural England:** No objections and considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.
- **Place Services (Ecology and Biodiversity):** Conditions relating to compliance with submitted appraisal, bat survey report and environmental statement, construction environmental management plan, biodiversity enhancement strategy, wildlife sensitive design operational scheme, and landscape and ecological management plan.



- **Place Services (Heritage):** Parameter Plans (as revised) would result in a moderate level of 'less than substantial' harm on the two designated heritage assets adjacent to the site.
- **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 blocks;
  - 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 and informative.
- **LBH Environmental Health (Land Contamination, noise, air quality):** No objection subject to conditions governing contaminated land, air quality neutral, residential boilers, non-road mobile machinery, noise and sound insulation.
- **LBH Highways:** No objection subject to conditions, legal obligations and informatives being applied: restricted CPZ to be introduced for application area, construction logistics plan, cycle storage, vehicle access, vehicle cleansing, restrictions on parking permits, controlled parking zone contribution.
- **LBH Business Development:** No meanwhile uses form part of the proposal between demolition and construction.
- **LBH Children's Services:** CIL contribution to go towards the cost of education.
- **LBH Refuse Officer:** No objection. URS guidance is currently being developed.
- **LBH Flood Officer:** No objection. The proposed Flood Risk Assessment and Strategy is acceptable.

- **Anglian Water:** No comment as the site is outside the Anglian Water area.

## 7 COMMUNITY ENGAGEMENT

- 7.1 In accordance with planning legislation, the developer has consulted the local community on these proposals as part of the pre-application process. In addition, it should be noted that a significant majority of residents have already been moved to new homes. Some with the right to return.

## 8 PREAPPLICATION DISCUSSIONS

### Quality Review Panel (QRP) Comments

- 8.1 The application was presented to the QRP for comments on the 27<sup>th</sup> June 2018 and the 18<sup>th</sup> July 2019. Final comments received from the panel were as follows:
- The panel supports the work done so far on developing the Design Code, but further detail is required to sustain the quality of development over the envisaged 12 year build-out period.
  - The Design Code's hierarchy of elevations lacks distinctiveness between each level, and there is little that is sufficiently distinctive to Romford within the architectural language, despite the character studies that informs it.
  - The masterplan leaves some significant aspects of the site unresolved, with some of the edges potentially problematic: the 'peninsula' between St Andrews Road and Cotleigh Road is still exposed, and the relationship between the scheme and the backs of the buildings along London Road and Cotleigh Road the scheme is clumsy, with unfinished edges creating an unsatisfactory boundary.
  - The ground floor units within the buildings of Phase One, and especially the corner unit at the junction of St Andrews Road and Waterloo Road, could feel exposed.
  - The first floor single aspect units along Waterloo Road in building two are unlikely to provide attractive living accommodation. The set-back will limit the amount of daylight they receive and their only view will be onto a busy road, the noise from which will be very intrusive. The panel recommends that the approach to these units should be reconsidered.
  - The commercial units along Waterloo Road are wide and shallow, which may further restrict their appeal to prospective occupants.
  - The shape of Building One is awkward, and creates a number of issues, not least an unsatisfactory unit on the ground floor at the entrance to the development.

- The arrangement of the cores in Building Two is successful, except for that in the south east corner, which is totally enclosed. Further, the core in Building One creates an overly long blind corridor.
- Within the courtyard gardens, the panel would like to see the potential for direct access from units at that level to be explored.
- The courtyard garden within Building Two could suffer become noisy, especially on summer evenings, and the panel would like the design team to consider how to mitigate this.
- The panel feels that the proposed strips of defensible space outside ground floor units are too narrow to be of much value to residents. These strips should be made more generous or removed with other devices to improve privacy depending.
- The entrance lobbies to the Phase One buildings need to carry through the quality and ambition of the exteriors.
- The different character areas are not sufficiently distinctive in resolution. More could be done with varying the paving and other services.
- Waterloo Road is a very polluted and hostile place and the panel asks that the design team need to give further thought to the kind of environment that can realistically be created there along that frontage.
- The proposed colonnade is a positive response, providing some shelter from the road, but the panel thinks that the space could be made more generous. The potential to continue the colonnade as a continuous line along Waterloo Road should also be explored.
- The panel notes that the trees indicated along Waterloo Road, in both the visualisations and on the model, are very unlikely to be present in reality, not least because of the presence of services beneath the pavement.
- In particular, the panel recommends that a thorough analysis of wind, shading and other factors is required to ensure that planting will be sustainable and maintainable, to avoid its failure and the subsequent degradation of the public realm.
- While the St Andrews Road spine is developing well, there are still issues to be resolved. First the layering of uses creates relatively tight spaces for each function, including a service road, a cycle way, a swale, a footpath, and a defensive strip to the ground floor units, with planting to the front.
- Although St Andrews Road is primarily a pedestrian and cycling route, the crossings within the roadway appear to give priority to vehicles.
- The panel thinks that the locations where on-street car parking is concentrated will impair the quality of the public realm in those areas.
- The panel is not convinced that the proposed water feature is a valuable addition to the scheme as shown, and would like to see a much stronger rationale for it, how it will be used and maintained.
- The panel is comfortable with the revised massing of the scheme and welcomes the reduced heights. It feels that the way in which the buildings step down along Waterloo Road is largely successful

- The panel noted that too many modes and uses have been loaded onto the primary access point to the site, off London Road, and there is a real risk of severe congestion, with service and delivery vehicles competing with cycle commuters, pedestrians and residents more generally, in a constrained space.
- The point of arrival, at the Waterloo Road crossing from The Battis, is still not successfully resolved. In particular, the panel feels that an oddly-shaped ground floor unit within building one makes for an unsatisfactory 'gateway'.
- The planted triangle proposed is also problematic, and the panel recommends that a more urban feel would be more appropriate, for example combining trees with hard surfaces.
- Further thought needs to be given to how the cycle route continues beyond the site, in particular from the crossing at Waterloo Road towards the station.
- The scheme will have a major visual impact on the approach to Romford, obscuring well-known local landmarks, and it will be essential to have a full appreciation of this aspect of the scheme's impact on the townscape.
- Despite the character analysis undertaken, the elevations are rather generic and do not create a distinctive sense of place, much less locate the scheme in Romford.
- The elevations of the buildings in Phase One are too busy in terms of materiality in that there are a number of material changes that do not necessarily relate to the building articulation. This undermines the strong contrasts suggested by the analysis of Romford's character. Simplifying and calming the materials, and concentrating effort and attention on key moments and the lower elevational treatment with high quality materials, would strengthen the architecture.
- The panel welcomes the attempt to signal entrances, but feels these could be more ambitious.
- Further consideration should be given to the treatment of balcony balustrades.
- The panel suggests that the balustrades could become integral to the story of the place and the buildings' architectural language.

8.2 The proposals have evolved considerably since being presented to the QRP on the 18<sup>th</sup> July 2019. A number of positive changes to the overall masterplan concept have been incorporated into the final scheme, whilst a number of the detailed elements relating to the detailed part of the application (Phase 1) were made to the scheme prior to submission, as well as further amendments post submission with the council's design officers. As such the scheme has evolved with positive changes following the Quality Review Panel in order to address comments that were made.

Strategic Planning Committee Developer Presentation Feedback (8<sup>th</sup> November 2018, 28<sup>th</sup> February 2019 and 9<sup>th</sup> January 2020)

8.3 A summary of comments received by the Committee on the 28<sup>th</sup> February 2019 were as follows:

- Further detail sought on the unit/tenure mix proposed relative to what exists at present.
- Further detail also sought on the nature of the private rental product and the management thereof.
- Underground refuse storage welcomed.
- Give consideration to 'neighbour contracts' to prevent anti-social behaviour and encourage positive relationships between neighbours.
- What was the allocation policy for returning residents?
- Would CCTV be included?

8.4 Comments received from Members on the 9th January 2020 presentation were as follows:

- The applicant was invited to consider the housing mix and the level of 3 bed+ provision being made
- Whether there is an opportunity to recess the upper floors of the blocks
- A wish to see a strong and lengthy marketing process for the units, with a Havering resident first emphasis
- A keenness to ensure that a crossing across Waterloo Road is provided to ensure that residents of the scheme can safely walk to the town centre
- The applicant was invited to provide more details of their refuse strategy, with a keenness to see a 'top quality solution'
- A wish to understand the sustainability credentials of the development, with an emphasis on low carbon

## **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 formal neighbour consultation was also undertaken with 454 neighbouring properties being notified of the application and invited to comment. Comments have been received from 31 neighbours.

9.3 The following local groups/societies made representations:

- Romford Civic Society objects to this application on the following grounds; - Excessive density - By virtue of its height, bulk and massing, negative impact on the streetscene in London Road, Waterloo Road and views from the conservation area. - Insufficient information on how the whole

development would improve the setting of listed buildings at St. Andrew's Church and Salem Baptist Church. - Negative impact on the amenity of residents in Cotleigh Road, by virtue of excessive height behind their properties, overlooking, loss of sunlight in back gardens, noise, disturbance and smells from cooking, kitchen noise and living space in the proposed flats behind them.

9.4 The following Councillor(s) made representations:

- None.

9.5 The following neighbour representations were received:

- 25 objectors
- 6 comments.
- No petitions have been received.

9.6 A summary of neighbour 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*

- Objection to a refurbished social housing estate being pulled down.
- Concerns about property boundary arrangements with the rear of Cotleigh Rd properties.
- The development would overlook into the rear of Cotleigh Rd properties, that is rear windows and also in the rear garden areas.
- Concern whether adequate parking facilities being provided for the number of homes proposed.
- Too many 1-bed properties proposed and feeling Council does not care about Romford.
- Concerns over the height of buildings overlooking Cotleigh Rd properties.
- Increase in density very concerning
- Loss of access to garages between Cotleigh Rd properties and the south western corner of the site
- Proximity of buildings to Cotleigh Rd properties will affect daylight, sunlight, privacy and cause nuisance via noise
- Increase in parking issues for residents and visitors and any plans for a CPZ should not include Cotleigh Rd

- Amount of housing will create congestion and all buildings should be reduced by half to allow for more green spaces and trees on the site
- Result in the erosion of Romford's cultural heritage and charm whereby Cotleigh Rd and St Andrew's Church will have their setting impacted upon.
- New buildings will lead to unacceptable overshadowing where none exists today.
- Objection to the height of existing buildings on the estate neighbouring Cotleigh Rd properties being increased from 2-storeys.
- Concern new residents to be able to apply for parking permits to use in Cotleigh Rd.
- Loss of amenities and views from the rear of Cotleigh Rd properties.
- Environmental impact during the course of construction in terms of a quiet environment.
- Development will lead to noises and smells through open windows.
- Insufficient information on how the whole development would improve the setting of listed buildings at St. Andrew's Church and Salem Baptist Church.
- By virtue of its height, bulk and massing would have a negative impact on the streetscene in London Rd, Waterloo Rd and views from the conservation area.
- The density of this development exceeds all government guidelines and the sheer height and bulk of the design will have a negative on the view of the town centre.
- Consider the development overpowering and hideous in design.
- Will the children's' playspace be segregated from the public.
- Buildings along Waterloo Rd will create a wind tunnel.
- Concern on how the increased density will impact on the local road and public transport infrastructure
- Will additional infrastructure be provided for additional increased number of people in the area
- Concern the 10 year phasing plan of construction would have on small businesses on London Rd.

#### *Support*

- None.

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

- 9.7 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.

- New commercial units along Waterloo Rd will draw people away from existing business on London Rd.

### **Procedural issues**

9.8 No procedural issues were raised in representations.



## **10 ENVIRONMENTAL IMPACT ASSESSMENT (EIA)**

- 10.1 In August 2018 an EIA screening request was made to the Council for the comprehensive redevelopment of the estate. In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, the London Borough of Havering determined the proposal as EIA development and that an Environmental Statement would be required.
- 10.2 Subsequent to the above, a scoping opinion was issued by the Council in February 2019 outlining what would be required within the Environmental Statement.
- 10.3 The current hybrid planning application is accompanied by an Environmental Statement. The environmental information for the purposes of the applicable Town and Country Planning (Environmental Impact Assessment) Regulations has been taken into account in the consideration of this application.

## **11 MATERIAL PLANNING CONSIDERATIONS**

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

- Principle of Development
- Design, Conservation and Heritage Considerations
- Quality of residential accommodation
- Inclusive Design
- Secured by Design
- Density
- Housing Mix
- Affordable Housing and Viability
- Open Space and Children's Play Space
- Impact on Neighbouring Amenity
- Environmental Issues
- Transport and Highways
- Energy and Sustainability
- Flooding, Drainage and Urban Greening Factor
- Community Infrastructure Levy

### **Principle of Development**

- 11.2 The existing site previously comprised of 290 residential homes and these were broken down into a total of 242 residential units comprising 171 Council tenants

(social rented affordable housing and 77 leasehold and freehold units (private tenure), a total of 31 residential units within an older persons home and a total of 12 temporary accommodation residential units within a hostel. Further, the estate also comprised of the Prince Albert Public House, the St. Andrew's Parish Community use building, areas of surface car parking and amenity green space, a multi-use games area (MUGA) and a small playground.

- 11.3 The proposal seeks to replace the above and comprehensively regenerate the estate with up to a maximum of 1,380 residential units, 1,375 square metres of flexible floorspace (Use Class A1, B1, D1 and D2) and 550 square metres of community floorspace (Use Class D1).

#### Residential Housing

- 11.4 Policy H1 of the London Plan seeks to optimise potential housing delivery across London, particularly through higher density residential development on brownfield sites with good existing or planned access to public transport and within walking distances of stations and town centres, including through the use of sensitive intensification of existing residential areas. The London Plan has set a 10-year housing target of 12,850 homes a year for the period between 2019/20 to 2028/29.
- 11.5 Policy CP1 of the Havering Core Strategy aims to meet a minimum housing supply of 535 within Havering by prioritising the development of brownfield land and ensuring these sites are used as efficiently as possible. It also seeks to enable high density mixed use development within Romford. Policy DC1 of Havering's Development Control Policies seeks to resist planning permissions that would result in the net loss of existing housing except in exceptional circumstances.
- 11.6 The proposal would result in a net increase of 1090 residential units on the existing site which would make a significant contribution towards meeting the above targets for net additional housing provision, whilst a total of 371 of these units would be brought forward as part of Phase 1 of the development.
- 11.7 The site is located in Romford just on the edge of the Town Centre and the brownfield site is surrounded by an area with a mix of uses in nature and parts of the site have excellent transport links. As such, the development would be in compliance with the aims and objectives of the above policies and the principle of a residential-led scheme on the site is considered appropriate subject to compliance with all relevant policies of the development plan.

#### Community Facilities

- 11.8 Policy S1 of the London Plan supports the provision of high quality, new and enhanced social infrastructure facilities and state that the loss of social infrastructure in areas of defined need should only be permitted where replacement infrastructure is provided, or where proposals form part of a wider infrastructure delivery and investment programme to meet future populations needs and services.
- 11.9 Policy CP8 of the Havering Core Strategy seeks to ensure major developments provide community facilities to meet new demand and where significant growth in the number of residents is planned. Policy DC26 of Havering's Development Control Policies outlines Romford as a preferred location for new community facilities and Policy DC27 seeks suitable alternative provision where redevelopment of existing facilities takes place.
- 11.10 The proposal seeks to re-provide the existing community facility at the St. Andrew's Parish Community Centre with a new facility that is 550 square metres in size. This would form part of proposed Block 06 which would be delivered under Phase 3 of 5 of the development. The delivery and securing of the community centre would form part of the section 106 legal agreement.
- 11.11 It should be also noted that in addition to the above, the proposal includes the provision of 1,375 square metres of flexible floorspace which could potentially include the provision of further community space. As such, the development would be in compliance with the aims and objectives of the above policies and the principle of a community facilities on the site is considered appropriate subject to compliance with all relevant policies of the development plan.

#### Public House

- 11.12 Policy HC7 of the London Plan seeks to protect public houses where they have a heritage, economic, social or cultural value, whilst Policy DC17 of Havering's Development Control Policies protects existing arts and entertainment facilities.
- 11.13 Redevelopment of the estate would require the demolition of the Prince Albert Public House, which is located in the centre of the wider proposed masterplan site and it is in this location that a new public open space and mixed use buildings at ground floor level would be proposed. The public house has not been designated as an Asset of Community Value. Further, whilst it does not benefit from a statutory listing or heritage protection, it is a Locally Listed Building and as such would still be considered a non-designated heritage asset under the NPPF.
- 11.14 Whilst its loss would be regrettable under these proposals, in the context of the overall estate regeneration its retention would create a difficult constraint on the

overall masterplan design, and could potentially jeopardise the extent of housing to come forward as part of those proposals, and this includes affordable housing.

- 11.15 The proposals have been updated to replace the pub with a like for like use within the commercial floorspace coming forward and this is to be secured via condition. Given the overall benefits of the estate regeneration scheme in terms of housing delivery, the replacement of the pub and the lack of any statutory protection of the pub in heritage terms, it is considered that refusal of the application on this basis would not be warranted.
- 11.16 It is for the above reasons that planning application Ref: P1187.20 for the demolition of Nos. 67-69 London Road, the Prince Albert Public House and associated structures, construction of a new vehicular access to London Road and associated works was granted planning permission in March of this year.
- 11.17 Demolition would normally not have been granted for the demolition until replacement proposals (including floorspace for public house use class) had been granted planning permission. In this instance, it was considered that given the logistics and phasing aspects including decanting, demolition and site clearance of an urban renewal project providing up to 1380 residential units, retention of the public house until planning permission is granted for the hybrid scheme could jeopardise key timings in bringing forward the wider benefits for the community.
- 11.18 The location of the public house is located in the centre of the wider Waterloo Estate and its retention whilst all other buildings are demolished would have served minimal benefit to the community. As such, the development would be in compliance with the aims and objectives of the above policies and the principle of a like for like replacement drinking establishment on the site is considered appropriate subject to compliance with all relevant policies of the development plan.

#### Hostel and Sheltered Residential Accommodation

- 11.19 Policy H8 of the London Plan applies to hostel and other specialist and supported forms of residential accommodation and require satisfactory re-provision to an equivalent or better standard.
- 11.20 Policy CP2 of the Havering Core Strategy seeks to ensure that the needs of those households with special needs, including the elderly are met, while Policy CP8 seeks to retain or re-provided community facilities where a need exists and this includes residential care facilities.

- 11.21 The site previously included a total of 31 residential units within an older persons home and a total of 12 temporary accommodation residential units within a hostel. These are not being reprovided as part of the proposals and as such would result in a net loss of hostel and sheltered accommodation. The applicant has stated the loss of the hostel is required to facilitate the redevelopment and regeneration of the site to deliver new housing, including additional affordable housing to what currently exists. The previous occupants of these uses will be re-accommodated in suitable alternative accommodation within the borough prior to the commencement of works.
- 11.22 Nonetheless, the loss of the existing hostel and sheltered accommodation would not be in compliance with the above policies. It is unclear into what types of suitable alternative accommodation these residents would be rehoused into and any such proposals do not form part of the current planning proposal under consideration in this application. However, given the significant scale of development as part of the regeneration of the estate and the net increase in both overall and affordable housing proposed, it is considered that these public benefits of the scheme and other considerations as a whole could outweigh the harm caused through non-compliance with the above policies in relation to specialist sheltered and hostel accommodation. These other considerations are covered elsewhere in this report.

#### Flexible Floorspace

- 11.23 The proposal also includes 1,375 square metres of flexible floorspace (Use Class A1, B1, D1 and D2) and this is to be located along Waterloo Road on the eastern boundary of the estate opposite the Brewery Shopping and Leisure centre. The inclusion of such flexible floorspace would meet the objectives of a number of the above stated policies in contributing to a mixed used development of the site.

#### Estate Regeneration

- 11.24 Policy H8 of the London Plan resists the demolition of affordable housing unless it is replaced by an equivalent amount of affordable housing floorspace, and affordable housing floorspace is reprovided on a like for like basis and integrated into the development to ensure mixed and inclusive communities. All estate regeneration schemes should take into account five key principles, which are looked at in turn below.
- 11.25 The existing site previously comprised of 290 residential homes and these were broken down into a total of 242 residential units comprising 171 Council tenants (social rented affordable housing and 76 leasehold and freehold units (private

tenure), a total of 31 residential units within an older persons home and a total of 12 temporary accommodation residential units within a hostel.

- 11.26 The proposal would increase the number of social rented units across the site from 171 to 212 units (+41) and there would also be a net increase in the number of total habitable rooms (+87) and overall floorspace (+917 square metres). Whilst this overall increase may not account for the existing 31 sheltered units and 12 hostel units given there is no like for like replacement, given the net increase in both overall and affordable housing proposed, it is considered that adequate replacement affordable housing is provided within the scheme.
- 11.27 It should also be noted that the existing Council tenants on long-term secure tenancies would be offered a right to return to the site and re-housed within the proposed development on the same terms and security of tenure. With regard to the 76 leasehold and freehold units (private tenure) affected by the estate regeneration, they have been treated fairly and fully compensated with a full market payment, a home loss payment and other moving/legal costs.
- 11.28 In order to secure GLA funding as part of the scheme, the applicant has engaged in a public consultation process with current and former occupants and set out the details in the submitted Statement of Community Involvement, whereby 98% of the 197 residents stated they were satisfied with the rehousing process.
- 11.29 Finally, Policy H8 of the London Plan states that alternative options should first be considered before demolition and rebuilding are considered as any benefit must be assessed against the wider social and environmental impact. In this instance, the current application forms part of a wider regeneration programme seeking to improve the quality of housing across the borough. The existing estate suffered from constraints relating to its overall layout, whilst the quality of the existing buildings was very low. As such, it was considered that a comprehensive redevelopment of the estate provides a better outcome.
- 11.30 For the reasons outlined above, it is considered that the proposal would accord with the requirements and key principles for estate regeneration.

## **Design, Tall Buildings Assessment and Heritage Considerations**

- 11.31 The existing buildings on the estate consist of various building typologies which include two-storey houses and flats, three-storey blocks of flats, four-storey stacked maisonettes, as well as two 11-storey residential towers (Thomas England House and William Pike House). These buildings are dated and make a negative contribution to the townscape in terms of their poor quality design, materials and condition.
- 11.32 The site itself is not located within any heritage designations, however the Grade II listed St. Andrew's Church and Salem Chapel are immediately adjacent to the site boundary. The Romford Conservation Area is to the northeast within the Town Centre on the other side of the ring road and includes a number of Grade II and Grade II\* listed buildings.
- 11.33 Development Plan policies seek to secure sustainable development that is of high quality and contributes towards local character, legibility, permeability and accessibility of the neighbourhood. Developments should contribute to people's sense of place, safety and security. Development should have regard to the pattern and grain of spaces and streets in orientation, scale, proportion and mass and be human in scale with street level activity.
- 11.34 The delivery of high quality design including the conservation and enhancement of the historic environment is a key objective of the planning system which is to contribute to achieving sustainable development as supported by the NPPF. Sustainable development is further described as including positive improvements in the quality of the built and historic environments including but not limited to replacing poor design with better design. A core planning principle of the NPPF is to always seek to secure high quality design.
- 11.35 NPPF Chapter 12 'Achieving well-designed places' reinforces that this is a key aspect of sustainable development and indivisible from good planning and should contribute positively to making places better for people. Chapter 7 also confirms that high quality design includes consideration of individual buildings, public and private spaces. Policies and decisions should ensure that development amongst other things, responds to local character and history and reflects the identity of local surroundings and materials, whilst not preventing or discouraging appropriate innovation. Also, that they are visually attractive as a result of good architecture and appropriate landscaping.
- 11.36 NPPF Chapter 15 'Conserving and enhancing the historic environment' sets out the criteria for the conservation and enjoyment of the historic environment in the strategy of local plans as well as relevant criteria for assessing and determining planning applications. Consideration includes harm posed to both designated and non-designated heritage assets and their setting.

- 11.37 At the regional level, Policies D1-D3 and D8 of the London Plan apply to the design and layout of development and set out a range of urban design principles relating to the quality of the public realm, the provision of convenient, welcoming and legible movement routes and the importance of designing out crime by optimising the permeability of sites, maximizing the provision of active frontages and minimizing inactive frontages.
- 11.38 At a local level, Policy CP17 of the Havering Core Strategy requires new development maintain or improve the character and appearance of the local area in its scale and design, whilst CP18 states that all new development affecting sites, buildings, townscapes and landscapes of special architectural, historical or archaeological importance must preserve or enhance their character or appearance. These are reinforced by Policies DC61 (Urban Design), DC63 (Delivering Safer Places), DC66 (Tall Buildings and Structures), DC67 (Buildings of Heritage Interest) and DC68 (Conservation Areas) of the Havering Development Control Policies.
- 11.39 The estate is undergoing transformation as part of the 12 Estates regeneration scheme led by Havering Council. The project will deliver 1380 mixed-tenure homes, community and commercial uses, new and enhanced connections and public open spaces. The site is bound by Waterloo road to the east, the railway tracks to the south, London Road to the north and a mid-density residential neighbourhood to the West, Situated in a highly connected location, at easy walking distance from the Market Place, Romford station, Cottons Park, and other socio-cultural amenities; the site has been identified as appropriate for intensification and densification, addressing the housing shortfall in the borough, and delivering much needed additional capacity and amenity.
- 11.40 The masterplan is organised around a legible and permeable street grid, with two main diagonal streets St. Andrew's and Queen Street and a network of smaller streets and residential lanes. Streets will be designed with enhanced public realm with trees and street furniture, comfortable for walking and cycling, alongside accommodating cars and service vehicles. The role of St. Andrew's Road would be strengthened and enhanced by being transformed into green link and movement corridor, comprising a dedicated pedestrian and cycle route, landscaping, and sustainable urban drainage systems, which will provide convenient and legible access to Romford Station and the town centre to the southwest and Cottons Park to the northwest with terminating views of the Grade II listed St. Andrew's Church retained.
- 11.41 The community will have access to a series of small open spaces, distributed along the lanes, streets and within blocks, creating a network of places to meet, recreate and relax. St. Andrew's Church, an existing landmark, will form the



focus of the development on one side of the intersection of the streets and a new public open park fronted by active community uses on the other side.

- 11.42 The new buildings will complete street frontages forming a compact, dense neighbourhood with overlooked and safe streets and public realm. The proposed block typologies respond to the existing edge conditions on site, such as Waterloo Road and the railway tracks to the south. The proposed massing strategy reflects these edge conditions with taller volumes in east and south that decrease gradually towards the north and west with a more sensitive approach to the setting of St. Andrew's Church and existing neighbourhood, forming the backdrop looking east.
- 11.43 A stronger and more defined development frontage would be created along Waterloo Road with active commercial ground floor frontages and public realm and landscaping improvements. A series of secondary streets and mews which would be well activated by ground floor residential flats, duplex units and townhouses served by front doors and landscaped front boundaries, ensuring greater east-west permeability towards the town centre.
- 11.44 Parking would be appropriately located under raised podiums and communal courtyards that would be surrounded by both residential and commercial units so as to avoid dead frontages. The development as proposed along the southern boundary, which includes the location of a proposed energy centre, would also include a landscaping corridor so that the site has a natural buffer from the rail line.
- 11.45 The proposed development aspires to provide a high quality development with place-making at the centre, encouraging sustainable and healthy lifestyles, responding to the local character, whilst at the same time reflecting growth and urban renewal within the town centre near key public transport hubs. As such, it is considered that the proposed layout, design and masterplan principles would accord with both the strategic and local urban design policies set out above.
- 11.46 The application is accompanied by a Design Code and parameter plans which provide a relatively flexible design framework for the later phases of the proposed outline application with the Design Code setting out design rules and general principles on a character area basis. These include design elements such as entrances, minimum and maximum set back distances, front boundary treatments and the design and distribution of communal core entrances, whilst allowing a degree of flexibility in terms of building lines and block layout.
- 11.47 With regards to Blocks 1 and 2 which form the detailed part of the scheme, the proposal also aspires to a high standard of architectural and materials quality. The buildings would have a simple brick finish with balconies and window openings grouped formally in consistent lines to emphasise the building angles,

edges and relatively slender vertical appearance. These two buildings would consist of the tallest elements within the whole application site and located at the southeastern entrance would define the new key gateway into the site along St. Andrew's Road. Two different tones of light brown and grey brick are proposed with bronze and grey metal cladding and perforated bronze balconies. The base of the buildings would also be appropriately emphasised through double height ground floors and set within brick colonnades. The design detail of these two blocks has been extensively discussed with the Council's urban design officers and a number of alterations to the proposals have been made in order to ensure that they can achieve a high quality outcome.

- 11.48 Subject to conditions requiring details and samples of all of the proposed materials, they are considered to suitably reference and complement the palette of materials in the surrounding area and are acceptable. Additionally, these conditions should ensure that lower quality materials such as composite type cladding and brick slips are not used, as these type of materials would undermine any quality attributed to the design. Consequently, a full size sample panel will be conditioned.
- 11.49 Overall, in terms of detailed architectural design, the proposals for Phase 1 have been carefully considered and subject to the conditions outlined above, the proposal will achieve a high quality and appropriate design response which would enhance the character of the building and the surrounding area. It should also be noted that these conditions are also to be included for the subsequent phases in order to ensure that the aspiration to achieve an appropriate standard of design across the whole site is maintained.

#### Tall Buildings Assessment

- 11.50 As noted above, the existing buildings on the estate range from single storey to 11-storeys and the surrounding context is varied with relatively taller and larger buildings located to the east within the Romford Town Centre and to the south of the railway line, whilst there are lower rise two and three-storey suburban properties to the west and north.
- 11.51 The proposed buildings as part of the hybrid scheme would consist of up to 16-storeys (detailed application Phase1) and up to 14-storeys (outline application Phases 2-5).
- 11.52 Policy D9 of the London Plan states that tall buildings should be part of a planned and design-led approach, incorporating the highest standard of architecture and materials and should contribute to improving the legibility and permeability of an area, with active ground floor uses provided to ensure such buildings form an appropriate relationship with the surrounding public realm. Tall buildings should not have an unacceptably harmful impact on their surroundings in terms

of their visual, functional, environmental and cumulative impacts, including wind, overshadowing, glare, strategic and local views and heritage assets.

- 11.53 The policy is clear that “Tall buildings shall only be developed in locations that are identified as suitable in Development Plans”.
- 11.54 Policy DC66 of the Havering Core Strategy and Development Control Policies DPD states that only in Romford Town Centre will tall buildings (defined as six storeys or more than 18 metres) be normally granted permission and Policy ROM19 of the Romford Area Action Plan further sets out specific areas where tall buildings may be acceptable – the application site lies outside of Romford Town Centre and the Romford Area Action Plan area.
- 11.55 Local Policy DC66 states that outside of the town centre, tall buildings may be granted permission in exceptional circumstances. The Policy does not explain what may be considered exceptional circumstances but goes on to outline criteria against which tall buildings must achieve. The justification for Policy DC66 explains that the criteria are derived from the London Plan 2008 – the version of the London Plan in force at the point of adoption of the Core Strategy and Development Control Policies DPD. The current London Plan was adopted earlier this year and therefore it is considered that the criteria part of Policy DC66 is inconsistent with the more recent plan and carries limited weight. The proposal is for a number of the buildings to fall within the definition of a tall building, this is not an area for tall buildings identified in any adopted development plan and therefore the proposal is contrary to Policy D9 of the London Plan.
- 11.56 The site sits within the Romford Strategic Development Area of the emerging Local Plan, Policy 1. Policy 1 states that tall buildings may be acceptable in the vicinity of the station. The justification for the policy states that the Romford Masterplan will be developed to identify locations for tall buildings. The Romford Masterplan is being prepared with the aim to be adopted as a Supplementary Planning Document.
- 11.57 Given the above, whilst the proposals would be contrary to Policy D9 of the London Plan as the site is not currently designated as an area allocated for tall buildings, within the context of the emerging plan and the site’s location near the station and on the edge of the Romford Town Centre, and also within the emerging Romford Strategic Development Area, it is considered that there is reasonable grounds and justification for the proposal to depart from Policy D9 of the London Plan. This should also be seen in the light that the GLA have not objected to the proposal with regard to the tall buildings policy.
- 11.58 The proposals improve pedestrian permeability through the site whilst public realm improvements and active frontages are proposed at ground level. The proposed buildings would provide a high quality landmark in longer distance

views. Whilst the proposals would result in less than substantial harm to heritage assets this is outweighed by the public benefits of the scheme, as the proposals form part of a wider regeneration programme across the borough seeking to improve the quality of housing. The proposed new buildings would result in an addition to an already varied townscape and will deliver an improvement to the skyline through its aspirational high quality design and appearance.

- 11.59 The site is located on the edge of the Town Centre and benefits from good public transport accessibility. The proposed height and massing strategy has located the taller elements along Waterloo Road and in the southeast corner of the site along the railway, whilst the height of buildings steps down towards the residential suburban context to the west and north and Grade II listed buildings immediately adjacent to the site. The taller elements are distributed across the blocks and generally located on street corners to emphasise the legibility of the proposed layout. Subject to the reduced heights and massing of Blocks 09 and 10 via condition (as noted above), the overall approach is considered appropriate.
- 11.60 The submission includes an Environmental Statement that outlines the development would not have an adverse impact on the micro-climate, aviation and telecommunications. Further, the south facing block elevations are reduced in height to allow for daylight and sunlight penetration into blocks and internal courtyards. As mentioned above, the proposed new buildings would result in an addition to an already varied townscape and will deliver an improvement to the skyline, whilst the proposals improve pedestrian permeability through the site with public realm improvements and active frontages are proposed at ground level.
- 11.61 Finally, subject to the materials conditions outlined above the aspiration to provide a high quality development could be achieved and as such the height and massing of the scheme would be acceptable.

#### *Heritage Views and Assessment*

- 11.62 The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the objectives that define sustainable development. Section 16 sets out how the historic environment should be conserved and enhanced.
- 11.63 Specifically, the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset

because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting'.

- 11.64 Where a proposed development will lead to 'substantial harm' to or loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a proposal will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 11.65 Further, The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"* and in relation to conservation areas, special attention must be paid to the *"to the desirability of preserving or enhancing the character or appearance of that area"*.
- 11.66 At a regional level, Policy HC1 of the London Plan states that development should conserve heritage assets and avoid harm. At a local level, Policy CP18 of the Core Strategy states that all new development affecting sites, buildings, townscapes and landscapes of special architectural, historical or archaeological importance must preserve or enhance their character or appearance, while Policies DC67 (Buildings of Heritage Interest) and DC68 (Conservation Areas) of the Havering Development Control Policies also reinforce this policy objective.
- 11.67 The site itself is not located within any heritage designations, however the Grade II listed St. Andrew's Church and Salem Chapel are immediately adjacent to the site boundary. The Romford Conservation Area is to the northeast within the Town Centre on the other side of the ring road and includes a number of Grade II and Grade II\* listed buildings.
- 11.68 The existing buildings on the site make a neutral contribution to the townscape in terms of their poor quality design, materials and condition, and their replacement are welcomed subject to the conditions outlined above.
- 11.69 The application is accompanied by a Heritage, Townscape and Visual Impact Assessment (HTVIA) in order to demonstrate the potential impact of the proposals on the settings of local heritage assets and views. The HTVIA demonstrates that the proposals have the potential to be seen in the near and middle distance views of some of the Conservation Areas and listed buildings nearby. The scheme would form part of the foreground or background views which take in existing large scale and tall buildings of differing architecture,

quality and age. A Built Heritage and Townscape Addendum letter from the applicant has also been submitted providing an assessment of the initially submitted illustrative plans, which during the course of the application superseded the originally submitted parameter plans. Therefore, for the avoidance of doubt the assessment below is on the proposed maximum parameter plans (as revised), which were originally submitted as illustrative proposals.

- 11.70 The main heritage considerations is the potential for development to impact on the setting of the Grade II listed St. Andrew's Church and Salem Chapel. Views within the HTVIA show the background setting of the Grade II listed St. Andrew's Church and Salem Chapel would be altered by the development. The existing 11-storey towers are visible within the background setting of these two listed buildings. However, the proposed scheme would increase the scale and mass of buildings in the background setting. As part of the HTVIA Addendum, a wireline view from Honiton Road of the Church of St Andrews has been provided, however no wirelines of the maximum parameters (as revised) to show the impact on the Salem Chapel have been provided.
- 11.71 The application was referred to Place Services, the Local Planning Authority's heritage consultant to provide comment on behalf of the Council. They have stated that the maximum parameters (as revised) would result in a moderate level of 'less than substantial harm' to the Church of St Andrew's having reviewed the additional information contained within the HTVIA and addendum. They have also stated that on the basis of all information submitted, it is likely that the proposed maximum parameters (as revised) would also result in a moderate level of 'less than substantial harm' to Salem Baptist Chapel given no updated wireline view was provided from Cottons Park to better understand the potential impact on the setting of the Chapel and the resulting level of harm.
- 11.72 Place Services further advised that whilst the maximum parameters (as revised) may have reduced the level of harm from high to moderate, further reductions in massing would reduce this level of harm further. Paragraph 194 of the NPPF requires 'clear and convincing justification' for any harm caused and paragraph 193 attributes great weight to the conservation of heritage assets, therefore, any amendments that could reduce harm should be explored.
- 11.73 As stated elsewhere in this report, the scale, massing and height of Blocks 09 and 10 have been reduced in order to address amenity concerns. These two blocks are located to the north and south of the Grade II listed church. The changes have been reflected in the submission of dotted line parameters of an illustrative proposal for Blocks 09 and 10. Officers consider that should outline permission be granted, there will be a condition securing that the scale, massing and height of Blocks 09 and 10 be no greater than dotted line

parameters of the illustrative proposal. These reductions would further lessen the harm on the Grade II listed church given their close proximity.

- 11.74 Opportunities for mitigating harm further may also arise in the consideration of the detailed design of the outline scheme at reserved matters stage. The maximum parameters (as revised) offer a firm basis for further mitigation through design measures at reserved matters stage.
- 11.75 It should also be noted that the GLA have also assessed the proposal in terms of the impact on the adjoining designated heritage assets and are of the view that the proposed scheme would cause less than substantial harm. Finally, Historic England have not objected to proposals and stated that the scheme should be determined in accordance with national and local policy guidance, and on the basis of the Council's specialist conservation advice.
- 11.76 'Substantial harm' is a high test and is considered to represent harm that is destructive to the significance of a heritage asset. As indicated by the Planning Practice Guidance, it is a matter of judgement whether or not a proposal causes 'substantial harm' or 'less than substantial harm', and indeed it is considered perfectly reasonable to conclude that within the parameters of the phrase 'less than substantial harm', some impacts can be more harmful than others. Having given consideration to the significance of the designated heritage assets, and the views of the Council's Urban Design officers, the Council's heritage consultant, the GLA and Historic England, it is considered that the overall harm to their significance does not amount to substantial harm, and is therefore considered to represent less than substantial harm.
- 11.77 In cases where the degree of harm is considered to be 'less than substantial', Paragraph 196 of the NPPF is of relevance and this indicates that the harm should be weighed against the public benefits of the proposal. The public benefits include a significant uplift of 1090 (net increase) in the total number of residential units on the estate including 212 social rented units, 197 affordable rent units and 147 intermediate units. Other benefits include the provision of modern residential accommodation, improved design quality of the streets and public open spaces, associated pedestrian and cycle improvements and reprovision of community facilities.
- 11.78 The community will also have access to a series of small open spaces, distributed along the lanes, streets and within blocks, creating a network of places to meet, relax and other recreational activities. St. Andrews Church, an existing landmark, will form the focus of the development on one side of the intersection of the streets and a new public open park fronted by active community uses on the other side.
- 11.79 The effect of the duties imposed by section 66(1) and 72(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 is that where harm is

identified, that harm should be given considerable importance and weight in the planning balance. An overall assessment is carried out later in this report.

### **Quality of residential accommodation**

- 11.80 Policy D4 of the London Plan provides the minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights for all tenures of residential housing. Single aspect units should normally be avoided and only provided where these units would constitute a more appropriate design solution in terms of optimising the capacity of a particular site whilst ensuring good design. Potential issues associated with single aspect units in terms of passive ventilation, privacy, daylight, overheating and noise should also be adequately addressed and single aspect units that are north facing contain three or more bedrooms, or are exposed to significant adverse impacts should normally be avoided.
- 11.81 These requirements are also further elaborated within the Mayor's London Housing SPG. These set out a benchmark unit per core per floor ratios. 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 corridor widths.
- 11.82 With regard to the detailed part of the application (Phase 1 consisting of Blocks 01 and 02), the two mixed tenure blocks comprise of approximately 57% dual aspect units with the remaining amount single aspect. However, only 12 of the remaining ones are north-facing single aspect units out of a total of 370 units. Balconies and private terraces serve all units, while the core per floor ratio ranges from 7 to 8, with one instance of 10 units per core in Block 01 for eleven floors. All units comply with the London Plan and the National Technical Housing Standards in terms of overall size, storage, communal space and bathroom size and as such are of an adequate quality.
- 11.83 The Building Research Establishment (BRE) guidelines provide a test for measuring the average daylight factor (ADF) within habitable 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, 1.5% ADF for living rooms is recommended. Phase 1 of the development proposes 371 units containing a total of 991 habitable rooms. A total of 80% of rooms would meet the minimum targets set by the BRE guidelines. Only 57% of combined living/dining/kitchen rooms, which are the primary living space, would meet this guideline however given the constraints and density of the proposal this matter in itself would not warrant refusal. Similarly, the one instance of 10 units per



core in Block 01 for eleven floors being above the recommended level of 8 units per core would also not warrant refusal.

- 11.84 Overall, given the density, design and layout of the perimeter and open courtyard blocks proposed, it is considered that the number of dual aspect units has been maximised and the number of north facing single aspects units minimised, which have also been provided with relatively shallow floorplans and staggered/projecting elevations, and as such on balance the quality of the residential units would be satisfactory.
- 11.85 With regard to the outline part of the application (Phases 2-5 consisting of Blocks 03 to 10), a total of 1009 residential units would be provided in 8 blocks. Indicative diagrammatical floor plans showing how the blocks could be designed to ensure that 1009 residential units could be accommodated in a manner whereby they would achieve a sufficient standard of residential accommodation have been submitted.
- 11.86 The outline block layouts in terms of depth of plan and length of frontage demonstrate that it is therefore likely that acceptable unit layouts could potentially be achieved. Further, they demonstrate how the outline blocks could be resolved in a way that avoids more than 8 units/core/floor and also how the blocks could be resolved in a way that avoids single aspect north facing units in all but one location per floor (within Block 3). There are approximately 600 units that would be single aspect, however this could rise depending on whether some properties with balconies are being counted as dual aspect. Since these indicative plans are for an outline scheme, and given the plans are constrained, it may not necessarily be possible to achieve all the units proposed should the number of single aspect units be required to be less. As such, a condition is to be recommended that the maximum number of units achievable may be less subject to detailed consideration of the reserved matters.
- 11.87 Given these drawings are for outline purposes only, there is limited detail in order to assess some of the more detailed matters. This includes the size of some of the 3 bed units at ground floor level, access to podium landscaped areas is not shown for some cores, the relationship between the podium landscape and private terraces needs careful consideration at first floor level in order to avoid overlooking issues, and the rationale is not clear when looking at projecting and inset balconies, as some layouts have balconies too close together and may have overlooking issues, which will either be dealt with at reserved matters stage or through an update to the Design Code.
- 11.88 Furthermore, a commitment to achieving equivalent compliance, where London Plan guidance around single aspect north facing and number of units/core is adhered to with only singular exceptions in specific circumstances would

provide reassurance that the submitted outline scheme could provide 1009 units of an adequate residential quality. The current Design Code suggestion that adherence to London Plan guidance will be 'maximised' is not considered sufficient and it is recommended that the Design Code be updated via the imposition of a condition. Similarly, current Design Code does not provide a clear commitment to achieving minimum daylight standards in line with BRE guidance and as such the suggestion that these would be 'maximised' is not sufficient. Again, it is recommended that the Design Code be updated to reflect this and secured by condition.

- 11.89 It should also be noted that the reductions in height, massing and scale of Blocks 09 and 10 and highlighted in illustrative dotted parameter plans, which are to be secured via condition, would result in impacting on the number of units that could potentially be accommodated within Blocks 09 and 10. The applicant has provided limited indicative material on how the units lost within Block 09 and 10 could be potentially accommodated in Blocks 03 to 08 of the outline proposal, however given the lack of indicative diagrammatical floorplans, officers are unable to confirm if this could be done in a fashion that would result in adequate residential quality.
- 11.90 Given the above with regard to the outline application, a condition is recommended should permission be granted restricting the maximum number of dwellings to be constructed on the application site pursuant to the development to a maximum of 1009 dwellings. The maximum number achievable may be less subject to detailed consideration of the reserved matters and requirement to achieve an acceptable mix of unit sizes and types, good standards of residential quality for future occupiers and acceptable amenity impacts to neighbouring properties. In conclusion, it is considered that the imposition of this condition would be an acceptable way to ensure future quality in the outline phases is secured.

### **Inclusive Design**

- 11.91 Policy D5 of the London Plan requires that all new development achieves the highest standards of accessibility and inclusive design, whilst Policy DC7 of the Havering Development Control Policies seeks 10% of all new homes to be wheelchair accessible.
- 11.92 Further, Policy D7 of the London Plan seeks all new homes to meet the Building Regulations M4(2) standard for 'Accessible and adaptable dwellings' and 10% of the dwellings shall be designed to meet the M4(3) standard for 'Wheelchair user dwellings'.
- 11.93 Details submitted with the application demonstrate that the development could meet the above requirements. These details are to be secured by condition to ensure that the development would be in full compliance with the provision of

M4(2). As such, the relevant condition will be applied.

- 11.94 Further, details submitted with the application also demonstrate that the development would provide 10% wheelchair user units. Therefore the development would also comply with the provision of M4(3) and these details are also to be secured via the imposition of a condition.

### **Secured by Design**

- 11.95 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.
- 11.96 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.
- 11.97 In keeping with these policies officers have consulted the Metropolitan Police's Designing Out Crime team 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**

- 11.98 The development seeks to provide 1380 residential units on a site area of 4.44 hectares which equates to a density of 311 units per hectare. The site is an area with a public transport accessibility levels (PTAL) that range from 2 to 6a (on a scale of 0 to 6b where 6b represents the highest level of public transport access).

- 11.99 Policy DC2 of Havering's Development Control Policies specifies a density range of 165-275 units per hectare. Policies D1-D4 of the London Plan place greater emphasis on a design-led approach to ensure that development makes the best use of land with consideration given to site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure.
- 11.100 In addition, policy CP1 states that the Council will prioritise the efficient development of brownfield land to help meet the Boroughs housing targets. While policy CP2 states that sustainable communities should be encouraged by "ensuring that the required sizes and types of new housing are of a density and design that is related to a site's access to current and future public transport and are compatible".
- 11.101 In this instance, when considering the existing context and location on the edge of a Town Centre, the public transport accessibility and re-provision of existing affordable housing on the site, the site would be suitable for a higher density residential-led scheme. Overall, the proposals would optimise the development capacity of the site and as such the proposed density is considered acceptable.

### **Housing Mix**

- 11.102 Policy DC2 of Havering's Development Control Policies sets out an indicative mix for market housing of 24% 1 bedroom units, 41% 2 bedroom units, and 34% 3 bedroom units. Policy 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) was informed by an extensive Housing Needs and Demands Assessment (2012), which 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.
- 11.103 The borough's housing needs have since been updated and there is a greater emphasis on family sized accommodation. Draft Policy 5 of the Havering Local Plan seeks a mix of 5% 1 bedroom units, 15% 2 bedroom units, 64% 3 bedroom units and 16% 4+ bedroom units for market housing. With regard to affordable housing, a mix of 10% 1 bedroom units, 40% 2 bedroom units, 40% 3 bedroom units and 10% 4+ bedroom units is sought. The draft policy does state that it would have regards individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities.
- 11.104 Policy H10 of the London Plan states that new development should generally consist of a range of unit sizes and sets out a number of factors that should be considered when determining the appropriate housing mix on a particular

scheme. This includes housing need, the requirement to deliver mixed and inclusive neighbourhoods, the nature and location of a site in relation to town centres and public transport access, the requirement to optimise housing potential, and the relationship between new build housing supply and demand within the existing stock.

- 11.105 The 824 private housing units would have a mix of 7% studios, 32% 1-bedroom units, 50% 2-bedroom units and 11% 3-bedroom units. The 409 social rented/affordable rent units would have a mix of 13% studios, 30% 1-bedroom units, 32% 2-bedroom units and 25% 3-bedroom units. The 147 intermediate units would have a mix of 14% studios, 33% 1-bedrooms, 47% 2-bedrooms and 7% 3-bedrooms. Overall, the housing mix would consist of 10% studios, 31% 1-bedrooms, 44% 2-bedrooms and 15% 3-bedrooms.
- 11.106 The proposed mix for social rent/affordable units has been led by the Council's local housing need and therefore meets the relevant suggestions in the Housing Strategy. It should also be noted that the percentages of the affordable mix of housing also has taken on board the need to reprovide the existing mix of social rented housing and there would be no less 2-bedroom and 3-bedroom units that previously existed on the site. The intermediate housing would have a shortfall of the suggested percentage of 3-bedrooms, as does the proposed amount of private market units when compared against the indicative mix of Policy DC2 and Draft Policy 5 of the Local Havering Plan. However, in this instance it is considered that the overall housing mix would provide a good mix of unit sizes when taking into account the site's location on the edge of a Town Centre, the public transport accessibility and the fact that the unit size mix of social rent accommodation has been led by local need. It should also be noted that the provision of further 3-bedroom units within the private market tenure units would potentially make the scheme even less viable than it currently stands and as outlined further above. Finally, the affordability levels of the 52 (13%) affordable rent studio units will need to be clarified and this is to be secured via the s106 legal agreement.
- 11.107 As such, it is considered that the overall proposed mix of housing would be appropriate in this instance.

### **Affordable Housing and Viability**

- 11.108 Policy CP2 of the Havering Core Strategy seeks to ensure that in total, borough-wide 50% of all homes from new residential planning permissions are affordable; of which 70% of affordable housing to be delivered as social/affordable rent and 30% as intermediate, to include London Living Rent

and Shared Ownership. This is also sought as an aspiration to be achieved in Policy DC6 of Havering's Development Control Policies.

- 11.109 Policies H5 and H8 of the London Plan sets out that all estate regeneration schemes which propose demolition are required to follow the 'Viability Tested Route' and are not eligible for the 'Fast Track Route', whilst these types of schemes are also expected to provide an uplift in affordable housing in addition to the baseline requirement for like for like replacement of existing affordable housing workspace.
- 11.110 The hybrid proposal as a whole proposes 40% of affordable housing by unit numbers and habitable rooms, with a 75/25% tenure mix in favour of low cost rent (social rent and affordable rent). Phase 1 of the development (detailed planning application) would comprise 49 social rent units, 26 affordable rent units, 46 intermediate units and 250 private units which represents 33% affordable housing by both unit and habitable room, with a 62/38% tenure mix in favour of low cost rent. Once the baseline requirement for the like for like reprovision of the existing 171 social rent units is accounted for, the level of affordable housing on the net uplift in housing would be 25% by habitable room, with a 60/40% tenure split between low cost rent accommodation and intermediate housing. However, this does not account for the existing hostel and sheltered housing on site (as referred to in Paragraphs 11.21 and 11.22), which is also in affordable housing tenure.
- 11.111 The application is accompanied by a Financial Viability Appraisal (FVA) given it is following the 'Viability Tested Route' under the London Plan. The applicant's FVA uses a fixed land cost of £1 as a benchmark land value, which is considered reasonable for estate regeneration schemes, and arrives at a residual profit equivalent to 5.69% on Gross Development Value, which is lower than the blended target profit of 14.62%.
- 11.112 The submitted FVA has been reviewed by the Council's independent assessor, whilst advisory comments were also provided by the GLA's viability team. After an initial review, further information was sought relating to the applicant's internal rate of return (IRR) approach, build costs, target profit rate and value attributed to social rent housing, as well as the assumed decant costs and finance rates. In response, the applicant submitted an addendum to the FVA with further information that was requested.
- 11.113 Knight Frank have reviewed the FVA and Addendum and concluded that whilst they would arrive at a slightly higher residual profit equivalent above 5.69%, their figure is still significantly less than the 14.62% blended target profit rate. Even accounting for any sensitivity in the input figures, the proposal would not

achieve the 14.62% profit rate. As such, it is considered that the proposal has sought to provide the maximum possible amount of affordable housing.

- 11.114 Given the size and timescales of the development in delivering up to 1380 residential units over 5 phases, an early, mid and late stage review mechanism will be required to be secured via the legal agreement in line with the London Mayor's Affordable Housing and Viability SPG. Additionally, the phasing of the affordable housing delivery by tenure will also be secured via the s106 legal agreement.
- 11.115 Policy H6 of the London Plan sets out the Mayor's preferred affordable housing tenures, which includes social rent, London affordable rent: London living rent and London shared ownership. The provision of 212 social rented units as part of the proposal are to be secured in the s106 legal agreement by reference to Social Target Rent levels. The provision of 197 affordable rented units are also to be secured via the legal agreement with reference to the Mayor's London Affordable Rent (LAR) benchmarks, which are updated annually, and to provide clarity on the affordability levels. For the avoidance of doubt, affordable rent at 80% of market rent is not acceptable.
- 11.116 The application also includes 147 units of intermediate housing that have been described by the applicant as 'low cost ownership products'. In order to comply with the definitions of intermediate housing set out in the development plan, intermediate shared ownership units should be available to households on a range of incomes below the maximum £90,000 net household income cap set in the London Plan, whilst annual housing costs (including service charges, rent and any interest payment) should be no greater than 40% of net household income. These requirements are to be secured via the s106 legal agreement.
- 11.117 For the reasons outlined above and subject to the relevant legal obligation set out, it is considered that the development accords with key policy objectives in relation to affordable housing provision.

### **Open Space and Children's Play Space**

- 11.118 Policy D21 of the Havering Development Control Policies states that it will require major new residential developments to include provision for adequate open space, recreation and leisure facilities. Where it is not possible to include such facilities within the development site, the Council will require the facilities to be provided nearby. In some cases improving the quality of existing facilities may be appropriate. Financial contributions to enable the provision of new facilities or improvement to the quality of existing facilities may also be sought.

- 11.119 The existing estate does not have any areas of designated open spaces, a corridor of trees runs along the southern boundary of the estate, which is designated as a Site of Importance for Nature Conservation (SINC). This provides both an acoustic and visual buffer from the railway line and is to be maintained as part of the proposals.
- 11.120 Within the existing estate, there is a relatively generous amount of communal open space which is undesignated and distributed across the site in the form of amenity lawns and areas of hard landscaping in between the residential blocks. Some of these spaces do not appear to have a clear function or sense of ownership in relation to the adjacent properties and in some instances do not have a particularly high amenity or biodiversity value.
- 11.121 As part of the proposals, the open space would be rationalised and reconfigured to provide a more formal open space framework comprising landscaped green corridors, a public square and streets, with more defined private and communal gardens at podium level. Overall, across the whole site there would be a net reduction of 1,400 square metres in open space. Given the existing condition of the open space within the estate, the objective to increase the density of the estate in order to provide more housing, the site's close proximity to Cotton's Park, and the aspiration to seek a high quality landscaping and public space as part of the proposals, there is no objection to the net loss of open space in this instance. This would also be subject to an off-site financial contribution to Cotton's Park for improvements in play space provision as outlined below.
- 11.122 Policy DC20 of the Havering Development Control Policies seeks to achieve the provision of adequate children's play space within 400 metres of home. Policy S4 of the London Plan states that residential developments should incorporate high quality, accessible play provision for all ages, at least 10 square metres per child. Play space provision should normally be provided on-site, however off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distance, and in these circumstances contributions to off-site provision should be secured via legal agreement. Play space should be available to all housing tenures within immediately adjacent blocks and courtyards to promote social inclusion.
- 11.123 The GLA's play space calculator (2019) would generate a requirement of 1,340 square metres of play space for Phase 1 (Blocks 1 and 2 of the detailed part of the scheme), as the housing mix would anticipate 134 children. The applicant has stated that Phase 1 would provide 720 square metres of play space within St. Andrew's Road and the podium and courtyard gardens, resulting in a 620 square metre shortfall. This shortfall is proposed to be mitigated through a financial contribution to improve off-site play space provision at Cotton's Park,



which is just north of the site. The principle of mitigating the shortfall with an off-site contribution is considered acceptable, however it is considered that the shortfall is much greater than 620 square metres. The 720 square metre figure of provision by the applicant in essence includes all of the communal open space within Blocks 1 and 2, and quite clearly not all of this space is designated play space. Some of these areas are defensible spaces, other includes pathways and also general communal areas. Whilst some of these areas would form a dual purpose and allow for child's play, it is not appropriate to include all of the communal open space provision in this calculation. As such, the financial contribution for off-site provision will be calculated on an accurate assessment of designated play space within the proposal only.

- 11.124 The same would also apply for the outline part of the scheme. The play space calculator would generate a requirement of 4,770 square metres based on the mix of housing contained within Blocks 03 to 10 within Phases 2 to 5 of the outline proposal. Approximately 1,000 square metres would be provided in the form of the new central open space within the estate and another 2,780 square metres would consist of the communal open spaces and podium for the remaining blocks. It is suggested that this would leave a shortfall of 990 square metres. As such, the principle of mitigating the shortfall with an off-site contribution is considered acceptable, however the financial contribution for off-site provision will be calculated on an accurate assessment of designated play space within the proposal only.

### **Impact on Neighbouring Amenity**

- 11.125 The proposal site is in relatively close proximity to a number of adjoining properties. Residential amenity comprises a range of issues which include daylight, sunlight, overlooking, overshadowing impacts, as well as sense of enclosure and a loss of outlook. These issues are addressed in detail below.
- 11.126 The Development Plan contains policies which seek to appropriately safeguard the amenities of residential occupiers when considering new development. Policy DC61 of Havering Development Control Policies states 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. The Residential Design SPD states that new development should be sited designed such that there is no detriment to existing residential amenity through overlooking and/or privacy loss, dominance or overshadowing, and a reduction of daylight and sunlight levels.
- 11.127 Policy D3 of the London Plan (Optimising site capacity through the design-led approach) states that development proposals should deliver appropriate outlook, privacy and amenity. Further, Policy D9 (Tall Buildings) states that the

wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building.

11.128 It is widely acknowledged that daylight and sunlight are fundamental to the provision of a good quality living environment and for this reason people expect good natural lighting in their homes. Daylight makes an interior look more attractive and interesting as well as to provide light to work or read by. Sunlight provides light and warmth, makes rooms look bright and cheerful and has a therapeutic, health-giving effect. In addition, daylight can reduce the need for electric lighting and sunlight can contribute towards meeting some of the heating requirements of homes through passive solar heating. Inappropriate or insensitive development can reduce a neighbour's daylight and sunlight and thereby adversely affect their amenity to an unacceptable level.

11.129 Paragraph 1.3.45-46 of the Mayor of London's Housing SPD states that:

*'Policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. An appropriate degree of flexibility needs to be applied 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 density 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 scope for the character and form of an area to change over time.'*

*The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.'*

11.130 As referenced above, The Building Research Establishment (BRE) provide guidance on site layout planning to achieve good sunlighting and daylighting ('Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011, 2<sup>nd</sup> edition' (released October 2011). It is intended for building designers, developers, consultants and Local Planning Authorities (LPAs).

11.131 The following properties have been considered for the purposes of neighbouring amenity impacts as a result of the proposed development:

- Nos. 9~51 Cotleigh Road (odd numbers only) opposite Development Block 09
- Nos. 6~24 Cotleigh Road (even numbers only) opposite Development Block 10
- Nos. 1-14 Verity House opposite Development Plot Block 10
- Nos. 53-65 London Road opposite Development Block 05

Maximum Parameters (Revised)

11.132 The proposed outline maximum parameters (revised) contain Development Block 10 opposite Nos. 6~24 Cotleigh Road (even numbers only) and Nos. 1-14 Verity House, which consists of a part 4, part 5 and part 6-storey building with varying heights between 14.6 and 21.4 metres. Given the staggered nature of the Cotleigh Road properties and the new Development Block 10, the distances between the two would vary from 13 metres to 21 metres.

11.133 Further, the proposed outline maximum parameters (revised) contain Development Block 09 (consisting of two parts) opposite the rear facing elements of properties at Nos. 9~51 Cotleigh Road (odd numbers only). The northern part of Block 09 would consist of a part 2, part 3 and part 4-storey building with varying heights between 8.3 and 14.6 metres. Given the staggered nature of the Cotleigh Road properties and the northern part of Block 09, the distances between the two would vary from 7 metres to 24 metres.

11.134 The southern part of Block 09 would consist of a part 4, part 6, part 8 and part 9-storey building with varying heights between 14.8 and 30.6 metres. Given the staggered nature of new and existing development, the distances between the two would vary from 21 to 45 metres between the rear elevations of the neighbouring properties and between 4 and 20 metres from the rear boundaries of the neighbouring properties.

11.135 An assessment of the above information with regard to maximum heights and distances from adjoining properties resulted in significant concerns from the impact proposed Blocks 09 and 10 development plots would have on the outlook of the above mentioned neighbouring properties.

11.136 The application was accompanied by a sunlight and daylight report within the Environment Statement, which provided an assessment of the originally submitted Illustrative Masterplan, which has now become the new revised maximum parameters in terms of its relationship with existing neighbouring buildings. The submitted report assessed the development against the BRE methodologies relating to daylight [Vertical Sky Component (VSC) and No Sky

Line (NSL)], sunlight [Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH)], and overshadowing [sun on ground assessment].

- 11.137 With regard to the impact of Block 09 on the amenity of neighbouring properties, given the level of transgressions above the BRE guidelines, officers considered that the proposed maximum parameters would have a minor to moderate adverse impact on daylight, a major significant adverse impact on sunlight, and a major significant adverse impact on overshadowing.
- 11.138 In terms of Block 10 impacting on the amenity of neighbouring properties, given the level of transgressions above the BRE guidelines, officers considered that the proposed maximum parameters would have a significant adverse impact on daylight and significant adverse impact on the sunlight of some properties in Verity House.
- 11.139 Therefore, when considering the combination of all the above assessments (outlook, daylight, sunlight and overshadowing), it was considered that the maximum parameters (as revised) would have a significant detrimental impact on the amenity of neighbouring properties and this was considered to be demonstrable harm. As such, the proposed maximum heights and massing of Blocks 09 and 10 needed to be revised so as to lessen the significant impact on the outlook to these neighbouring properties, as well as reducing the number of losses outside of the BRE guidelines so that any transgressions would be of a negligible to minor adverse impact.

#### Dotted Line Parameters for Development Blocks 09 and 10

- 11.140 In response to the above officer assessment, the applicant has submitted dotted line parameters of an illustrative proposal for Blocks 09 and 10 with reduced heights and massing. In summary, the proposed reductions are as follows:

##### Block 10

- Removal of 6-storey element, reduction in size of the 5-storey element, an increase in setback to 4-storey element from 1600mm to 2400mm, and a reduction in overall maximum height to no more than 3.2m per storey, i.e. 3-storey (9.6 metres), 4-storey (12.8 metres) and part 5-storey (16 metres).

##### Block 09 (Northern Part)

- Removal of part 2, part 3 storey dog leg extension, an increase in setback to 4-storey element from 1600mm to 2300mm, and a reduction

in overall maximum height to no more than 3.2m per storey, i.e. 3-storey (9.6 metres) and 4-storey (12.8 metres).

Block 09 (Southern Part)

- Removal of part 4, part 6 storey dog leg extension, reduction of 6-storey element to 5-storeys, reduction of 8-storey element to 7-storeys, reduction of 9-storey element to 8-storeys, and a reduction in overall maximum height to no more than 3.2m per storey, i.e. 5-storey (16.0 metres), 7-storey (22.4 metres) and 8-storey (25.6 metres).

11.141 An assessment of the dotted line parameters with regard to maximum heights and distances from adjoining properties would result in a reduction of the significant harm proposed Blocks 09 and 10 (as per the maximum parameters as revised) would have on the outlook of the above mentioned neighbouring properties in Cotleigh Rd. Whilst there would still be some degree of harm in terms of outlook, given the scale and massing of Blocks 09 and 10, it is considered that this harm would be of a minor to moderate impact on the outlook of these properties.

11.142 Further, additional sunlight and daylight information was submitted by the applicant for information purposes only. This was based on an illustrative proposal that although not identical to the dotted line parameters was virtually similar for the purposes of assessing the dotted line parameters of Blocks 09 and 10 with regard to the BRE methodologies relating to daylight [Vertical Sky Component (VSC) and No Sky Line (NSL)], sunlight [Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH)], and overshadowing [sun on ground assessment].

11.143 When considering the additional sunlight and daylight information relating to the impact of Blocks 09 and 10 on the amenity of neighbouring properties, there was a reduction in the level of transgressions above the BRE guidelines, and as such officers consider that the proposed dotted line parameters would predominantly have a minor adverse impact with some isolated instances of moderate impact on daylight, sunlight and overshadowing to some of the properties in Cotleigh Road. It should be noted that this limited impact does not apply across all of the tests above to individual properties but rather in some instances of one or two of the tests above. Similarly, there would also be some instances of impact on some properties in Verity House but as above this impact would only be limited to one or two of the tests above and not all of them.

11.144 As such, the submitted dotted line parameters of an illustrative proposal for Blocks 09 and 10 with reduced heights and massing would result in lesser harm to the neighbouring properties than the harm that would be caused by the maximum parameters (as revised). Officers have assessed all of the

daylight/sunlight information as well as the distance/height ratio regarding outlook, and consider that the overall impact of the proposals in terms of the above tests would be at levels that are considered acceptable for a scheme of this nature that seeks to bring forward the delivery of a substantial amount of homes. As such, it is considered the predominantly minor impact with some isolated instances of moderate impact on amenity is outweighed by the public benefits of the scheme. Should outline permission be granted, there will be a condition securing that the scale, massing and height of Blocks 09 and 10 be no greater than the dotted line parameters of the illustrative proposal.

### **Environmental Issues**

- 11.145 The Council's 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.
- 11.146 A Contaminated Land study was undertaken with details submitted under the application. These were reviewed by the Council's Public Protection officer who recommended conditions seeking a remediation strategy and verification report. It should also be noted that the site is brownfield land and currently benefits from residential use. Therefore some remediation and contamination works would be required to secure the site for future use. These will be secured via conditions.
- 11.147 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.
- 11.148 The Environmental Health Noise officer has reviewed the Noise report submitted which states that given the location of the site there is unlikely to be significant noise generated that may represent greater harm to neighbouring residents. Therefore subject to conditions governing future machinery use the proposed development would be acceptable on noise grounds. These conditions would be imposed should planning permission be granted.

### **Transport and Highways**

- 11.150 Policies CP9 and CP10 of the Havering Core Strategy and Policy DC32 of Havering's Development Control Policies 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.

- 11.151 Policy DC33 seeks to ensure all new developments make adequate provision for car parking. In this instance, the proposals would comprise of 370 car parking spaces, which represents an overall car parking ratio of 0.27 car parking spaces per residential unit (1380). A total of 80 of the above mentioned car spaces would be for disabled designated spaces, which represents 5.8% of the units. The detailed part of the scheme (Phase 1) would comprise 43 car spaces (0.12 car spaces per unit), with the remaining outline part of the scheme (Phases 2-5) capped at a maximum of 0.3 spaces per unit. The PTAL of the site ranges between 2 and 6a, however this varies across the estate with the predominant part of the site in PTAL 2-3. London Plan policy would seek car free developments for sites within PTAL 5-6, whilst sites with a PTAL of 2-3 in Outer London would trigger a maximum car parking standard of 0.75 car spaces.
- 11.152 There are currently 316 existing car spaces across the site and this is being increased to 370 of which 80 would be for disabled bays. Given the number of spaces required for existing residents as part of the like for like replacement of social rented accommodation, and the PTAL rating of the site, it is considered that the proposed number of spaces are appropriate. These provisions have been reviewed by officers with the Highways team and TfL and are considered sufficient to meet the needs of the end users. However, (20% active and all remaining spaces passive) electrical vehicle charging points in line with the London Plan are required and will be secured via condition, whilst a Car Parking Design and Management Plan will be secured via condition to ensure that the disabled car parking is used only by Blue Badge holders and arrangements for meeting any future demand for such provision.
- 11.154 Cycle parking is proposed for 640 long stay cycle spaces and 11 short stay spaces. This provision would be in line with Policy T5 of the London Plan. TfL have commented that at least 20% cycle spaces be Sheffield stands at normal spacing and a further 5% should be provided as Sheffield stands at wider spacing. It is considered that there is sufficient space within the buildings and around the site to accommodate suitable cycle, therefore a condition will be attached to agree the cycle provision and to ensure it complies with the London Cycle Design Standards (LCDS).

- 11.153 Council's Highway Officer has also recommended a condition for a restricted CPZ to be introduced to the area and legal obligations placing restrictions on parking permits and a financial obligation towards the creation of a controlled parking zone. The Local Highway Authority has raised no objection subject to the applicant entering into a Legal Agreement to secure these sums. 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 also be consistent with the other residential developments within this area.
- 11.154 Finally, a Travel Plan is to be secured via the s106 legal agreement, and a Construction Logistics Plan and a Delivery and Servicing Management Plan are to be secured via condition.

### **Energy and Sustainability**

- 11.155 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), the London Plan requires all major developments to meet targets for carbon dioxide emissions. This is targeted with 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.
- 11.156 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.
- 11.157 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.



- 11.158 The submission has been accompanied by an energy strategy which proposed a 50% reduction in carbon dioxide emissions on the residential element of the scheme, of which 10% would be achieved through energy efficient measures. This exceeds the minimum on-site carbon reduction targets set out in the London Plan. A 36% reduction in carbon dioxide emissions is proposed on the non-residential element of the scheme, of which 8% would be achieved through energy efficiency measures. This falls short of the 15% on-site target set out in the London Plan, however this only relates a very small element of the scheme given the non-residential floorspace in the context of the scheme as a whole.
- 11.159 A site-wide heat network supplied by a centralised energy centre is proposed which would provide heat for all the residential units, and which would be powered by a combination of Air Source Heat Pumps and efficient gas boilers. Although there are no existing or planned district heat networks, the scheme should be future proofed to enable connection to a DHN should one come forward at a later date and this is to be secured via the legal agreement.
- 11.160 A total of approximately 1,120 solar panels are proposed across the scheme which would be incorporated with green/brown roofs. These are to be secured via condition on later reserved matters applications. The submission has assessed the potential for overheating in residential units taking into account climate change and it was concluded that they have a low risk of overheating. Phasing conditions are required to ensure that all latter phases of the outline are to be connected to the site wide energy centre that is to be provided under Phase 1 of the development. Any remaining shortfall in CO2 emissions would be met through a carbon off-set payment secured via the legal agreement.

### **Flooding, Drainage and Urban Greening Factor**

- 11.161 Guidance under the NPPF seeks to safely manage residual risk including by emergency planning and give priority to the use of sustainable drainage systems.
- 11.162 In order to address current and future flood issues and minimise risks in a sustainable and cost effective way, 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, it 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.

- 11.163 In terms of local planning policies, Policy DC48 of the Havering Development Control Policies 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.
- 11.164 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) of the Core Strategy 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.
- 11.165 The application site is located within Flood Zone 1 in an area benefitting from flood defences and generally has a low and very low risk of surface water flooding with some high risk areas located along Waterloo Road, St. Andrew's Rd and Queen Street. The Council's drainage and flood officer has been consulted as well as the Environment Agency. The drainage officer has confirmed that the submitted details are acceptable subject to conditions while the Environment Agency has stated that given the distance of the site from the nearest river and its flood status, there are no objections. Therefore subject to conditions the proposal is acceptable.
- 11.166 Sustainable urban drainage systems have been incorporated into the proposal including two swales, two rain gardens, a pond, green/brown roofs at rooftop and podium level which would serve landscaped courtyards with soft landscaping and planting. There would also be a total of 25 attenuation tanks below the ground. The above ground SUDS measures would provide biodiversity benefits and in combination with the below ground storage tanks, help to provide a 55% reduction on the surface run-off for the existing site. Overall, it is considered that the proposed SUDS measures are satisfactory and these are to be secured via condition.
- 11.167 Policy G5 of the London Plan sets an Urban Greening Factor (UGF) target score of 0.4. The proposal provides a UGF assessment of the detailed part of

the scheme (Phase 1), which achieves a score of 0.28. This would be achieved through a range of urban greening measures, including public realm landscaping, trees, natural vegetation and tree planting along the southern boundary with the railway, a rain garden and flower planting in pocket parks and podium courtyard spaces. Whilst the 0.28 score falls short of the London Plan target score, this should be read in the context that the existing UGF of Phase 1 land area would be 0.15 and the proposal would represent a net gain in UGF. Finally, should outline planning permission be granted a condition would be imposed seeking UGF assessment for phases 2-5 of the proposals.

### **Community Infrastructure Levy**

- 11.168 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. Therefore a mayoral levy would be applicable, subject to any relief for social housing.
- 11.169 The London Borough of Havering's CIL was adopted in September 2019. As the proposed floor area for the development is 15,354sqm 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 levy would be applicable subject to relief for social housing.

## **12 HOUSING DELIVERY TEST**

- 12.1 On 19 January 2021 the Government published the 2020 Housing Delivery Test (HDT) results. The results show that within Havering 36% of the number of homes required were delivered over the three year period of 2017-18 to 2019-20. The NPPF (paragraph 11d) states that where the delivery of housing was substantially below (less than 75%) the housing requirement over the previous three years, the policies which are most important for determining the application are considered out of date. This means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. This is commonly referred to as the "tilted balance" in favour of sustainable development and is a significant relevant material consideration in the determination of the planning application. Such tilted balance does not apply to the consideration of impact of the development on designated heritage assets – the assessment in this regard is provided in this report.

- 12.2 The proposed development would contribute to boosting housing supply and delivery and this weighs in favour of the development. The assessment of the planning application has not identified significant harm nor conflict with development plan policies and where there is some harm/conflict identified it is considered that these do not outweigh the benefits of the proposal. Other than a separate consideration on the impact on designated heritage assets, it is considered that in this case the proposal does benefit from the presumption in favour of sustainable development set out in paragraph 11 d) of the NPPF.

### **13 FINANCIAL AND OTHER MITIGATION**

- 13.1 Policy DC72 of Havering's Development Control Policies 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. The London Plan also states that development proposals should address strategic as well as local priorities in planning obligations.
- 13.2 From a sustainability perspective, the proposal is accompanied by a Sustainability Statement and Energy Statement. Any remaining shortfall in CO2 emissions would be met through a carbon off-set payment secured via the legal agreement. Council's Highway officer has also recommended a condition for a restricted CPZ to be introduced to the area and legal obligations placing restrictions on parking permits and a financial obligation towards the creation of a controlled parking zone. Additionally, the shortfall in designated children's play space is to be mitigated through a financial contribution to improve off-site play space provision at Cotton's Park, which is just north of the site.
- 13.3 In light of the above and discussions in other parts of this report the proposal would attract some necessary section 106 provisions to mitigate the impact of the development on the wider infrastructure within the Borough.

### **14 EQUALITIES AND DIVERSITY**

- 14.1 Section 149 of the Equality Act 2010, which came into force on 5th April 2011, imposes important duties on public authorities in the exercise of their functions, including a duty to have regard to the need to:
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 14.2 For the purposes of this obligation the term “protected characteristic” includes:- age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 14.3 Policy CG1 of the London Plan also seeks to support and promote the creation of an inclusive city to address inequality. The Council has undertaken an Equality Impact Assessment for its 12 sites regeneration programme which considers the impact of the proposed schemes on the protected characteristics. In view of the stakeholders affected by the development proposals, the most significant impacts in this case relate to the protected characteristics of age, disability and gender. It is considered that there would be no communities falling under the list of “protected characteristics” that would be significantly or unduly harmed by the proposals.
- 14.4 Therefore in recommending the application for approval, officers have had regard to the requirements of the aforementioned section and Act and have concluded that a decision to grant planning permission for this proposed development would comply with the Council’s statutory duty under this important legislation.
- 14.5 In light of the above, the proposals are considered to be in accordance with national regional and local policy by establishing an inclusive design and providing an environment which is accessible to all.

## **15 CONCLUSIONS**


- 15.1 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.
- 15.2 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.
- 15.3 The application seeks hybrid planning permission (part outline, part detail) for the demolition and redevelopment of the Waterloo and Queen Street Estate site to provide up to 1,380 (C3) residential units (40% affordable), up to 1.375 square metres of flexible commercial floorspace (Use Class A1, B1, D1/D2), and up to 550 square metres of community floorspace (Use Class D1).

- 15.4 In land use terms, the proposal would result in a net increase of 1090 residential units on the existing site which would make a significant contribution towards meeting the above targets for net additional housing provision, whilst a total of 371 of these units would be brought forward as part of Phase 1 of the development. As such, the principle of a residential-led scheme on the site is considered appropriate subject to compliance with all relevant policies of the development plan.
- 15.5 The main heritage considerations is the potential for development to impact on the setting of the Grade II listed St. Andrew's Church and Salem Chapel. It is considered that the maximum parameters (as revised) would result in a moderate level of 'less than substantial harm' to these designated heritage assets.
- 15.6 Sections 66(1) and 72(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 require decision-makers to give considerable weight and importance to the desirability of preserving the setting of listed buildings, and to the desirability of preserving or enhancing the character or appearance of a conservation area. Paragraph 196 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 15.7 It is considered that the level of public benefit provided by the proposals outweighs the 'less than substantial harm' to the heritage assets. The public benefits include a significant uplift of 1090 (net increase) in the total number of residential units on the estate including 212 social rented units, 197 affordable rent units and 147 intermediate units. Other benefits include the provision of modern residential accommodation, improved design quality of the streets and public open spaces, associated pedestrian and cycle improvements and reprovision of community facilities. The community will have access to a series of small open spaces, distributed along the lanes, streets and within blocks, creating a network of places to meet, recreate and relax. St. Andrews Church, an existing landmark, will form the focus of the development on one side of the intersection of the streets and a new public open park fronted by active community uses on the other side.
- 15.8 Subject to a condition securing that the scale, massing and height of Blocks 09 and 10 be no greater than dotted line parameters of the illustrative proposal, it is considered that the development would result in lesser harm to the neighbouring properties which is considered to be of a minor to moderate impact on amenity and outweighed by the public benefits of the scheme outlined above.

- 15.9 Further, subject to a condition restricting the maximum number of dwellings to be constructed on the application site and that the maximum number achievable may be less subject to detailed consideration of the reserved matters and requirement to achieve an acceptable mix of unit sizes and types, good standards of residential quality for future occupiers and acceptable amenity impacts to neighbouring properties, it is considered that this would ensure future quality in the outline phases is secured.
- 15.10 In addition to the Mayoral and Havering Community Infrastructure Levy, the application is supported by a comprehensive s106 planning agreement and contributions related to and mitigating impacts of the scheme. For these reasons and all the detailed matters considered in this report, the scheme is acceptable subject to conditions, informatives and the s106 legal agreement.
- 15.11 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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 <b>Havering</b> LONDON BOROUGH	<b>Strategic Planning Committee 17 June 2021</b>
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<b>Application Reference:</b>	<b>P0883.20</b>
<b>Location:</b>	<b>HAVERING COLLEGE OF FURTHER AND HIGHER EDUCATION TRING GARDENS</b>
<b>Ward</b>	<b>GOOSHAYS</b>
<b>Description:</b>	<b>DEMOLITION OF EXISTING BUILDINGS AND REDEVELOPMENT OF THE SITE TO PROVIDE 120 RESIDENTIAL DWELLINGS COMPRISING 78 HOUSES AND 42 FLATS(1BED X 12, 2BED X 53, 3BED X 55) WITH ASSOCIATED CAR PARKING, LANDSCAPING, OPEN SPACE, PLAY SPACE AND INFRASTRUCTURE.</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 site is under the ownership of the Council and is a significant development.</li></ul>

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

- 1.1 The application site is identified as a 'Major Developed Site' in the Council's Core Strategy. Policy DC46 states that when determining planning applications on these sites and that in the event of complete or partial redevelopment, the Council will seek proposals for residential use or community use, subject to relevant policies in the Plan. 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.
- 1.2 This report concerns a detailed planning application for the redevelopment of the site to provide 120 dwellings units in buildings extending to between 2 and 3.5 storeys in height together with associated car and cycle parking, hard and soft landscaping, open space, play space and infrastructure works involving demolition of existing building and structures.

- 1.3 The site is currently occupied by Havering College of Further and Higher Education buildings depicting the era that they were constructed with a mismatch of buildings and structures. Officers consider that the proposal would protect the natural and built environment in accordance with the principles of sustainable development and meet an identified housing need.
- 1.4 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.
- 1.5 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.
- 1.6 The principal planning considerations arising from the proposals are the acceptability of the redevelopment of this Green Belt site in principle and its impact upon the Green Belt, 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.
- 1.7 The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2019), the policies of The London Plan (2021), Havering's Core Strategy and Development Control Policies Development Plan Document (2008) the emerging Local Plan, as well as to all relevant material considerations including the responses to consultation.

## **2 RECOMMENDATION**

- 2.1 That the Committee resolve to GRANT planning permission subject to:

1. agree the reasons for approval as set out in this report, and
2. 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:

- i. **Affordable Housing and Wheelchair Homes**

The provision on site of 37.3% by habitable rooms and 39.2% of the units within the development as affordable housing (with a tenure split of 72.8% social rent to 27.2% intermediate housing) to include the following unit mix:

- 4 x 1bed 2 person Flats (Social Rent);
- 4 x 1bed 2 person Flats (Shared Ownership);
- 10 x 2bed 4 person Flats (Social Rent);
- 10 x 2bed 4 person Flats (Shared Ownership);
- 1 x 2bed 3 person House (Shared Ownership);
- 8 x 3bed 4 person Houses (Social Rent); and

10 x 3bed 5 person Houses (Social Rent).

47 units / 198 habitable room.

Early Review Mechanism if not implemented within 2 years.

Late review mechanism to capture any uplift in profit, threshold of which to be negotiated.

ii. **Sports Pitch Contribution**

A financial contribution of £150,000 to go towards the Brittons Academy project to be paid on the commencement of development.

iii. **Open Space for Public Use**

Provision and retention of public open space, including maintenance

iv. **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.

v. **Transport and Highways**

Submission of Travel Plans. The full travel plan should 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.

A financial contribution of up to £50,000 towards Controlled Parking Zone / implementation of appropriate parking measures around the development.

A financial contribution of up to £50,000 towards implementation of New zebra crossing in Whitchurch Road by Tring Gardens on road safety grounds.

vi. **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 SI 2 of the London Plan: Contribution of £201,609 towards carbon reduction programmes within the Borough, duly Indexed.

vii. **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.

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

2.2 That the Assistant Director Planning is delegated authority to negotiate the legal agreement indicated above and that if not completed by the 30<sup>th</sup> September 2021 the Assistant Director of Planning is delegated authority to refuse planning permission or extend the timeframe to grant approval

2.3 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. Landscape Management Plan (Including biodiversity benefits of the scheme)
6. Secured by Design
7. Wheelchair Adaptable Dwellings
8. Window and Balcony Details
9. Removal of Permitted Development Rights
10. Photovoltaic Panels
11. Boundary Treatments
12. Water Efficiency
13. Energy Statement Compliance
14. External Lighting Scheme
15. Noise Protection
16. Air Quality
17. Contaminated Land
18. Surface Water Drainage
19. Sustainable Drainage Systems (SUDs)
20. Maximum 105 litres of water per person per day
21. Car Parking Plan
22. Disabled Parking Plan
23. Electrical Charging Points
24. Vehicle Access Prior to Occupation
25. Cycle Storage
26. Travel Plan
27. Demolition, Construction Management and Logistics Plan
28. Construction Hours (8.00am and 6.00pm Monday to Friday, and between 8.00am and 1.00pm on Saturdays and not at all on Sundays and Bank Holidays/Public Holidays.)
29. Highway Works

- 30. Wheel Washing
- 31. Visibility Splays
- 32. Fire Brigade Access
- 33. Detail of Fire Hydrants
- 34. Refuse and Recycling
- 35. Playspace details, provision, maintenance and retention
- 36. Existing and Proposed Ground Levels
- 37. Site Levels
- 38. Construction Ecological Management Plan (Updated)

### **Informatives**

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

## **3 SITE AND SURROUNDINGS**

- 3.1 The application site measures approximately 3.8 hectares and is occupied by a range of buildings and hardstanding utilised by the Havering College of Further and Higher Education. The site is self-contained and is screened by woodland to the north, east and south. Existing residential properties along Tring Gardens and Tring Walk are adjacent to the site's western boundary. Residential properties on Priory Road abuts its boundary to the north.
- 3.2 The existing site comprises a number of buildings used for education purposes. The main building is split into the north and south buildings which are both three storeys and are linked by a central building which is one and two storeys in height. There are several other buildings / structures mainly single-storey around the site and significant amount of hard standing surrounding the buildings
- 3.3 There is a large area of open space in the north east part of the site, which is currently laid out as a football pitch wholly used by the College.
- 3.4 The site lies within the Green Belt and is identified as Major Developed Site within the Green Belt in the LDF. It is adjacent to designated Borough Open Space, a Site of Nature Conservation Importance (SNCI) and a Country Countryside Conservation Area (all associated with Dagnam Park and Hatter's Wood ancient woodland).
- 3.5 There are two existing vehicular access points to the site, both from Tring Gardens. The main access is broadly located in the centre of the western boundary with the second access point located towards the south-west corner.
- 3.6 The surrounding area is suburban in character and comprises existing two storey dwellings. Dagnam Park and the wider Green Belt extend eastwards beyond the woodland which encloses the site. The site has a PTAL rating of 1a to 2. There are bus stops on Whitchurch Road served by bus route 294 which travels between

Havering Park and Noak Hill. Harold Wood Rail Station is approximately 2km south of the site.

- 3.7 There are no listed buildings on the site or in the vicinity, nor does it form part of a conservation area. The site is in Flood Zone 1 and therefore at a low risk of flooding.

#### **4 PROPOSAL**

- 4.1 The applicant seeks planning permission for the demolition of existing buildings and structures and comprehensive redevelopment of the site to provide 120 residential dwelling units comprising 78 houses and 42 flats, associated car parking, landscaping, open space, play space and infrastructure.
- 4.2 The proposed buildings will range in height between 2 storeys, 2 storeys with roof accommodation and 3½ storeys. The houses are mainly two-storeys in height, seven of which have accommodation in roof space while the 6 blocks of flats are 3½ storeys with accommodation in roof space.
- 4.3 Each of the 6 blocks of flats would contain 7 units comprising 2 x 1bed and 5 x 2bed self-contained flats. The proposed houses would be terraces and semis, 16 of which will be 2 bedroom dwellings and remaining 62 to be 3 bedroom houses. The housing mix is provided below in further detail:

78 residential houses comprising of

Market

- 15 x 2 bed house;
- 44 x 3 bed house;

Affordable – Social Rent

- 18 x 3 bed house

Affordable – Shared Ownership

- 1 x 2 bed house

42 residential apartments comprising of

Market

- 4 x 1 bed apartment;
- 10 x 2 bed apartment;

Affordable – Social Rent

- 4 x 1 bed apartment
- 10 x 2 bed apartment

Affordable – Shared Ownership

- 4 x 1 bed apartment
- 10 x 2 bed apartment

- 4.4 Some houses have on plot parking while the rest have communal parking mostly located to the rear. Cycle storage would be within the rear gardens. The apartment blocks are served by on-street parking with cycle and refuse storage located at ground level. A 1.3ha open space is proposed to the north/east to be used by existing and future residents.

#### **Overall site**

- 4.5 With the exception of flats at the top of the apartment blocks and the coach house unit which is set over parking, the majority of dwellings will be provided with direct access to private amenity space and the flats with balconies.
- 4.6 In addition to private amenity space, future residents of the proposed dwellings will also have access to communal amenity space in the form of large open space in the north east of the site.
- 4.7 The development proposals include closing the existing main access point to the college and adding a new access to the west, with the previous emergency access onto Tring Gardens becoming a secondary access. A wide 800sqm landscaped corridor linking Tring Gardens with the proposed open space, announcing a direct and accessible route to all and providing a visual connection with the open space.
- 4.8 The proposed site access junction will take the form of a simple priority junction with footways on either side. Appropriate kerb radii and highway width will accommodate the vehicles typically using the access. The proposed vehicular access through the site will be via the access road, provided to a width of 4.8m, with the secondary access width of 3.7m. Within the site itself, the roads vary in width from 3.1m to 4.8m.
- 4.9 A 16sq.m electricity substation is proposed to the northwest end of site. This will be located at the end of a cul-de-sac serving plot 23 to 25 terraced houses.

## **5 PLANNING HISTORY**

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

P0041.19 – 30m high swann lattice tower, mounted with 12 No antennas, 2 No GPs Modules, 4No. 0.6metre dishes, located within a compound comprising of 2.1 metre high palisade fencing 6No. cabinets and 1No. electrical meter cabinet and associated development. Refused 07-03-2019.

M0008.19 – 25m Lattice mast, 12No antenna, 2No GPS antennas, 4No. 0.6m dishes, 7No.cabinets, 1No Electrical meter cabinet and compound and other ancillary development. Refused 16-12-19. Allowed at appeal 13-4-21

### **Pre-Application Discussion**

Prior to the submission of this planning application, the applicant has engaged with LBH planning and design officers extensively over the last 18 months. Officers agree that the site comprises previously developed land and the principle of residential development is acceptable subject to the application submission demonstrating that there is no demand for the existing use for other community uses and that the existing sports pitch provision can be accommodated elsewhere. In respect of the design of the proposals, the scheme has been subject to extensive pre-application discussions with Officers as well as two QRP reviews. Officers expressed throughout the preapplication process that the quantum of development, layout arrangement, the public land status of site (which requires 50% affordable provision as the benchmark), will carry significant weight in the determination of an acceptable proposal for this Green Belt site.

The design has evolved in order to maintain the level of open space at the rear of the site and create a more suburban form of development to reflect the surrounding character of Harold Hill. The height of the flat blocks has been reduced and the width of the central landscaping areas has been increased. This matter is discussed in the Principle section of the report.

### Summary of QRP Comments and Response from Applicant

QRP Comment	Officer Remark
Welcomes the way the scheme maintains the openness of its Green Belt context, creating new visual and physical connections to the woodland beyond.	Site layout – the ‘green link’ through the centre of the site has been improved, and now helps create a more clearly defined street network. The location and design of apartment units have been designed to respond to the street network and integrate more sensitively to the existing neighbouring houses.
Currently, its character is unclear and the team need to be able to articulate what makes this place special	
The reconfiguration of the scheme from a rigid grid to a more fluid layout, rooted in the arcs and contours of neighbouring housing, is welcomed.	
Shifting the vehicular access to the east side of the site was not the aim of the comments of the previous review: rather, the panel would like to see generous pedestrian-focused entry points, aligning with the break in the buildings across Tring Gardens and see the eastern side as a key opportunity.	
The panel is unconvinced by the proposed swale, which currently works against the topography, and so will not function effectively as part of the site’s drainage solution. In addition, it restricts access to the main green space.	Landscape – proposals have been rationalised to minimise the impact of high levels of parking and incorporate SUDS infrastructure. A high quality green space is created to the north of the site, and the design updates improved the way proposed housing integrates along this edge.
While car parking is more dispersed overall, the panel is concerned that that parking along Tring Gardens, which is the public face of the scheme, is overly dominant and should be redesigned.	
The proposed play area is in the wrong place, and risks feeling isolated and poorly overlooked.	



While simple, robust architecture is appropriate here, the success of the scheme will depend upon the details, including high quality entrances and materials. Buildings should not be generic, should relate well to each other but do not have to be in the 'foreground'	Architectural expression – the updated proposal takes cues from the form and layout of housing in the surrounding area, and is now more suburban in character. Officer comments on enhanced quality contemporary detailing have been addressed, such as minimising unsightly fascia boards at roof/wall junctions, and the proportion/alignment of windows. A softer palette of materials has been introduced to improve the way the scheme integrates with neighbouring houses.
The steep pitches of the roofs are out of place, and panel feels that they should better reflect the shallower pitches of the surrounding streets and horizontal window alignments.	

Following previous Pre-App and QRP comments, the design team attended a series of workshops with Council urban design officers to address previous concerns raised. Through this process the design team made significant updates to improve the quality of the scheme. Urban design officers are satisfied that these updates have created a scheme of acceptable quality that integrates appropriately within the surrounding context

#### **Summary of SPC Comments and Response from Applicant**

SPC Comment	Applicant Response	Officer Remark
Fully consider the access options into and across the site (by foot and vehicle). The Committee were keen to see a worked through solution in relation to Tring Gardens, given the road width and the number of vehicles that park along it	We can provide this for the presentation	This was presented in the 2 <sup>nd</sup> Developer Presentation and acceptable.
Understand how the footprint of the proposal works relative to the footprint of the school complex	These will be updated once we have a fully agreed layout but the scheme will be assessed under NPPF para 145 (g II)	Detailed comparable plans have been provided which are self-explanatory. Members were satisfied with the level of info provided. This is also reported in the Committee report.
Further detail is sought on the tenure mix of the affordable units, including what nomination rights	The Council will own the AH	The tenure mix and level of AH provision considered to be acceptable.

the borough would have. Ideally, the Affordable Housing (AH) should be Council owned AH		
Detail on the community engagement strategy	We have undertaken a public exhibition and ward members will be kept up to date once the application is submitted. We will update the website with information and keep this updated through construction.	Community engagement statement. See below.
Infrastructure impact, particularly school places. Further details sought	The applicant will make contributions in line with any consultation response from the Local Education Authority (LEA).	The LEA has advised that the development will trigger new school places and have recommended CIL/s106 contribution to address the shortfall. This is reported in the report. A CIL contribution is required and will be collected by Havering Council.
Sustainability credentials and environmental standards to be employed	These will be in line with the London Plan	An Energy Statement has been submitted with the application and found to be compliant with relevant policies. Compliance is to be secured through s106 and condition which is recommended.
Opportunity to add/create social value through the development	The proposals include a significant area of public open space, opening the site for the public which is a benefit over the current situation.	The public open space of approximately 1.4ha is to be secured by s106 agreement. This is part of the Head of Terms outlined in the report.
Specifically in relation to Dagnam Park:  • Assurance sought that the development would not encroach into it Site security	The existing boundary treatment will be retained to ensure no access to DP	The existing boundary treatment has been retained and there is no direct link/access from the

<ul style="list-style-type: none"> <li>•What would the impact be upon the boundary landscaping to the park? Need to ensure appropriate protection measures are included</li> </ul>	It is proposed to retain current boundary treatment.	application site to the Dagnam Park. This is to be secured by condition.
Ecological assessment is sought	Surveys have been undertaken and an ecological assessment will be submitted with the application.	An Ecology Statement has been submitted with the application. The measures proposed have been considered satisfactory. This is secured by conditions.
Further detail on the height of blocks and the unit mix	Max height 3.5 storeys	The height of the buildings at 2 and 3.5 storeys have been negotiated with officers and found to reflect existing and prevailing character of the application site and surroundings.
Opportunity to consider perimeter landscaping/planting for the properties on Tring Walk	Full boundary treatments are being considered and these will be included in the application.	A detailed landscaping plan and maintenance and boundary treatment in response, is to be secured by condition.
Need for appropriate street lighting	This will be incorporated and form a condition of any planning permission	Details of lighting across the development is secured by condition.
Consider including a turning circle for emergency service vehicles on Tring Gardens	This is not required for highway safety	There will be two access into the site with one being for emergency use only.

## Community and Stakeholder Engagement

A Statement of Community Involvement accompanies the application and this document explains the programme of public consultation and community engagement carried out prior to the submission of the application. As part of its programme of community engagement, the applicant has initiated a number of public consultation exercises including leaflets distribution, press releases, public consultation event during the day and evening, engaging with Local Councillors to invite to a preview of the public consultation, writing to local groups, meeting with Friends of Dagnam Park, consultation website where all of the exhibition materials

could be viewed, questions asked and comments submitted, as well as undertaking two Strategic Planning Committee Developer Presentations.

## **6 CONSULTATION RESPONSE**

### **6.1 Statutory and Non Statutory Consultation**

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

#### **LBH Highways –**

Highway officers have examined the above planning application and given that the current land use of Havering College will change to residential development, we would like to future proof the impact that this will create immediately on the residents and within the area.

To mitigate the issues arising in the future, we suggest that s106 contribution includes the following items

- i) **Control Parking Zone / implementation of appropriate parking measures around the development.** The estimated cost is £50k. This will include scheme design, consultation, public advertisements, traffic management orders and implementation costs;
- ii) **New zebra crossing is implemented in Whitchurch Road by Tring Gardens** on road safety grounds. This will include scheme design, consultation, public advertisements and implementation costs. The crossing will help the pedestrians to cross the road safely. The estimated cost is £50k.

Officer comment: Noted and appropriate S106 clause 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.

As a consequence, a S106/CIL contribution is a necessary requirement from all new developments that will generate additional children. The S106/CIL education contribution will go towards the cost of creating the additional school places needed for those children generated as a consequence of new housing in the borough.

A tenure breakdown for this scheme is available, so this have been applied using the GLA Population Yield Calculator. This development therefore, will generate the following number of pupils in each school phase:

- Early Years – 28

- Primary- 28
- Secondary - 11
- Post 16 - 5

**LBH Environment Health – (Noise)** Recommend refusal on noise grounds unless recommended condition can be attached and enforced.

Officer Comment: Suggested condition is included

**LBH Environment Health – (Contamination)** No objection subject to conditions

**LBH Environment Health – (Air Quality)** No objection subject to post commencement condition.

Officer comment: Noted and appropriate condition and informatives suggested.

**LBH Waste & Recycle Team –** Ensure there is sufficient numbers of refuse and recycling bins; no objection to the proposal subject to condition and informatives.

Officer comment: Noted and appropriate condition and informatives suggested.

**LBH Housing –** Although the proposal has not achieved the 50% affordable allocation on public land, there have been some adjustments that make the scheme more amenable.

There is a risk of setting of a precedent for public land where in the climate we are in and the increasing demand for genuinely affordable homes could be undermined. However, by maximising the affordable rental offer to 3 bedroom houses and the general mix of 4 one beds and 10 two beds that is most needed.

Would be keen to engage with the registered provider in place for the affordable scheme so that we can be satisfied.

Affordable housing provision should be subject to an early and late stage review if it is showing that additional affordable housing can be provided.

Officer comment: Noted and appropriate condition, obligation and informatives suggested.

**LBH Park Development –** No comment has been received.

**London Fire Brigade –** Consideration has been given to the provision of fire hydrants and it will be necessary to install one new fire hydrant. The proposed hydrant is to be installed in the location in the location as indicated in red on the attached plan.

Officer comment: Noted and appropriate condition and informative suggested.

**Thames Water –** (Foul Water and Surface Water) no objection to the application based on the information provided.

**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.

**UK Power Networks** – The proposal is in close proximity to our substation. The applicant should provide details of the proposed works and liaise with the Company to ensure that appropriate protective measures and mitigation solutions are agreed in accordance with the Act.

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

Officer comment: Noted and appropriate condition and informatives suggested.

**Sport England** – Although the site may have only had college use the playing field still does exist and once the development commences the playing field would effectively cease to exist therefore payment on commencement would broadly align with Sport England expectations.

I am unable to formally withdraw the objection until I see the draft S.106 Agreement and it is signed however I can confirm that provided the S.106 Agreement includes a term that £150,000 would be spent on the new/improved Artificial Grass Pitch at Britons Academy which would be paid on the commencement of development then Sport England would remove its Holding Objection.

Officer comment: Financial contribution as requested forms part of the S106 head of terms.

**London Borough of Redbridge** – No comment received.

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

**Anglian Water Authority** – No comment received.

**NHS** – No comment received.

## **7 COMMUNITY ENGAGEMENT**

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

## **8 LOCAL REPRESENTATION**

- 8.1 The application was advertised via a Press Notice and Site Notice displayed at the site for 21 days.
- 8.2 A total of 251 consultation letters were sent to neighbouring properties regarding this application.

- 8.3 79 representations (74 objection, 2 comments with condition, 2 comments, 1 comment okay and a petition in support with 122 signatures) have been received.

### **Representations**

- 8.4 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**

- i. The amount of new developments in our area is excessive. 120 additional homes is far too much and ludicrous for a small road like Tring Gardens;
  - ii. Concerned about the level traffic to be generated as a result;
  - iii. There will be impact on local wildlife and the Manor nature reserve;
  - iv. No adequate infrastructure to support the level of dwellings proposed;
  - v. The surgeries are overfull in the area;
  - vi. There will be increase in pollution and noise;
  - vii. The entrance site at Tring gardens will be a living nightmare for all the residents during construction and everyday volume of traffic;
  - viii. The road is not wide enough to accommodate more traffic;
  - ix. Not enough parking within the site for the proposed development;
  - x. There will be loss of privacy to my property from the use of the community gardens;
  - xi. Tring Gardens is a narrow road, the amount of heavy road traffic this will cause down a very narrow quiet road will be hazardous;
  - xii. The current infrastructure is struggling to cope with the current residents of the area without an additional 400+ residents which is what this development proposes. There has been no allocated provision for schooling or healthcare/NHS and will also have a huge impact on the current transport links as they are limited;
  - xiii. The proposal will overdevelop the area and encroach on the Green Belt land;
  - xiv. The development will ruin the area; the natural green belt area and conservation would be ruined;
  - xv. Will cause overcrowding in the area as the area is already over populated;
  - xvi. Will put too much strain on the infrastructure -schools, doctors, and police;
  - xvii. None of the houses are social housing which is a big problem in Harold hill and most residents feel strongly about this as Harold Hill is a council estate;
  - xviii. The area needs more educational places, entertainment places, schools and nurseries and surgeries;
  - xix. There should only be houses (and fewer of them) on this development. A doctor's surgery should also be built here;
  - xx. I don't agree with demolishing this building which is there to help our children grow;
  - xxi. The data for the Transport Assessment which indicates reduction in vehicles from around the college during the morning peak hour cannot be correct as more cars are expected from the use of the site for residential purpose.
- Objection comments (petition with 212 signatures)
- xxii. Proposal is unsuitable for this location in that the overloaded local infrastructure (doctors, schools etc) will be further undermined; it will cause massive traffic and

parking problems in Tring Gardens, nearby public transport problems and will negatively affect the wildlife in the Dagnam Park - The Manor.

Comment with condition

- xxiii. To match surrounding area I wish the development was built in red brick, not yellow. Other than that I think it's a great plan. I much rather have residential properties next door than the college. My only concern is for school and GP places with so many new developments being built in the area.

Officer comment: The NHS was consulted as a statutory consultee and no response has been received nor concern raised about pressure on GP places that may arise from the development. The other issues raised are addressed in the context of the report.

## **9 Relevant Policies**

- 9.1 The following planning policies are material considerations for assessment of the application:

### National Planning Policy Framework (2019)

The National Planning Policy Framework (NPPF) sets out Government planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.

Themes relevant to this proposal are:

- 2 - Achieving sustainable development
- 5 - Delivering a sufficient supply of homes
- 8 - Promoting healthy and safe communities
- 9 - Promoting sustainable transport
- 11 - Making effective use of land
- 12 - Achieving well-designed places
- 13 - Protecting Green Belt land
- 14 - Meeting the challenge of climate change, flooding and coastal change
- 15 - Conserving and enhancing the natural environment

### London Plan 2021

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience
- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public realm
- D11 Safety, security and resilience to emergency
- D12 Fire safety



- D14 Noise
  - G2 London's Green Belt
  - G4 Open space
  - G5 Urban greening
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H10 Housing size mix
- S4 Play and informal recreation
- E11 Skills and opportunities for all
- G1 Green infrastructure
  - G9 Geodiversity
  - S5 Sports and recreation facilities
  - SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI6 Digital connectivity infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI12 Flood risk management
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy Streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T9 Funding transport infrastructure through planning
- DF1 Delivery of the Plan and Planning Obligations

Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017)

The following are key excerpts from the Mayoral guidance on the provision of affordable housing:

- **Fast Track Route:** 'The threshold for public sector land (land that is owned or in use by a public sector organisation, or company or organisation in public ownership, or land that has been released from public ownership and on which housing development is proposed) is set at 50 per cent to be considered under the Fast Track Route to provide affordable housing on-site, meet the specified tenure mix, and meet other planning requirements and obligations to the satisfaction of the LPA and the Mayor where relevant, are not required to submit viability information. Such schemes will be subject to an early viability review, but this is only triggered if an agreed level of progress is not made within two years of planning permission being granted (or a timeframe agreed by the LPA and set out within the S106 agreement)
- **Viability Tested Route:** 'Schemes which do not meet the 50 per cent affordable housing threshold, or require public subsidy to do so, will be required to submit detailed viability information (in the form set out in Part three) which will be scrutinised by the Local Planning Authority (LPA), and where relevant the Mayor, and treated

transparently. Where a LPA or the Mayor determines that a greater level of affordable housing could viably be supported, a higher level of affordable housing will be required which may exceed the 50 per cent threshold. In addition, early and late viability reviews will be applied to all schemes that do not meet the threshold in order to ensure that affordable housing contributions are increased if viability improves over time'.

#### Play and Informal Recreation SPG (2012)

The calculator accompanying this SPG should be used to estimate the child yield associated with the scheme and the amount of any play space subsequently required as a part of the proposal.

#### Sustainable Design and Construction (2014)

This SPG contains advice on natural resource management, climate change adaptation and pollution management. It reinforces similar policies contained within national and local planning policy.

#### Character and Context SPG (2014)

This document sets out the principles of site responsive design that should inform the Design and Access Statement to be submitted with the application, helping to promote the right development in the right place.

#### Housing SPG (2016)

This SPG provides (amongst other things), the principles and standards intended to create well designed, high quality housing. Guidance is provided on residential density (Table 3.2), designing for Undeveloped Areas / areas with Indeterminate Character (Paragraph 1.3.47), and Design Standards. Key design standards include:

- 8 - Entrance and approach;
- 10 - Active frontages;
- 11 - Access;
- 14 - Shared Circulation;
- 19 - Car parking;
- 24 - Dwelling space standards;
- 26 - Private open space;
- 28 - Privacy;
- 29 - Dual aspect;
- 31 - Floor to ceiling heights; and
- 32 - Daylight and sunlight.

#### Accessible London SPG

This and the document Design and Access Statements: How to write, read and use them (Design Council, 2006) guidance from Design Council CABE will also help to inform preparation of the Design and Access Statement needed to accompany the application.

#### Havering Local Development Framework Core Strategy and Development Control Policies Development Plan Document (2008)

The following policies are considered relevant to the proposed development:

- CP1 - Housing Supply
- CP2 - Sustainable Communities

- .. CP5 - Culture
- . CP8 - Community facilities
- . CP9 - Reducing the need to travel
- . CP10 - Sustainable transport
- CP14 – Green Belt
- . CP15 - Environmental Management
- . CP17 - Design
- . DC2 - Housing Mix and Density
- . DC3 - Housing Design and Layout
- . DC6 - Affordable Housing
- . DC7 - Lifetime Homes and Mobility Housing
- . DC18 - Protection of Public Open Space, Recreation, Sports and Leisure Facilities
- . DC27 – Provision of Community Facilities
- . DC29 - Educational Premises
- . DC32 - The Road Network
- . DC33 - Car Parking
- . DC34 - Walking
- . DC35 - Cycling
- . DC36 – Servicing
- DC45 – Green Belt
- DC46 – Major Development Site in Green Belt
- . DC49 - Sustainable Design and Construction
- . DC50 - Renewable energy
- . DC51 - Water supply, drainage and quality
- . DC52 - Air Quality
- . DC53 - Contaminated Land
- . DC55 - Noise
- . DC61 - Urban Design
- . DC63 - Delivering Safer Places
- DC66 - Public Realm
- . DC72 - Planning Obligations
- DC27 – Provision of Community Facilities
- DC29 - Educational Premises

#### HaVering Draft Local Plan (2018)

The following policies should inform design of the proposed development:

- . 3 - Housing supply
- . 4 - Affordable Housing
- . 5 - Housing mix
- . 7 - Residential design and amenity
- 17 – Education
- . 12 - Healthy communities
- . 14 - Eating and drinking
- 16 - Social Infrastructure
- . 23 - Transport connections
- . 24 - Parking provision and design
- . 26 - Urban design
- . 27 - Landscaping
- . 29 - Green infrastructure
- . 30 - Nature conservation

- 33 - Air quality
- 34 - Managing pollution
- 35 - On-site waste management
- 36 - Low carbon design, decentralised energy and renewable energy

#### Havering Supplementary Planning Documents (SPDs)

Aspects of the following documents apply to the proposed development though need to be read in combination with newer mayoral guidance:

- Residential Design (2010)
- Sustainable Design and Construction (2009)
- Planning Obligation (Technical Appendices) (2013)

## 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 Havering College, Quarles Campus 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.

#### Loss of Education facility

10.2.3 Policy DC27 of the Core Strategy states that “*planning permission which involves the redevelopment of a community facility will be granted where it can be*

*demonstrated that there is no longer a need for the facility affected, either in its current use or any alternative use, or where suitable alternative provision is made.”* Policy DC29 relates to ensuring that the provision of primary and secondary education facilities is sufficient in quantity and quality to meet the needs of residents.

- 10.2.4 Emerging Local Plan Policy 17 seeks to safeguard existing education provision within Havering. Proposals which result in the net loss of education facilities will be resisted unless it can be robustly demonstrated that there is no current or future need.
- 10.2.5 According to the applicant, the college is to be consolidated with others in another campus in the Borough as part of planned estate rationalisation. The application site will therefore be surplus to requirements and available for redevelopment.
- 10.2.6 The development proposals include the complete demolition of the existing college buildings in order to facilitate its consolidation with other Campuses. The proposed redevelopment of the site is the result of the campus having being identified as surplus to need by the College, who are consolidating their operations but continuing to provide services within the borough from their remaining Ardleigh Green Campus and Rainham Campus Construction Centre. The college is to use the proceeds from the acquisition of the site in order to facilitate this move.
- 10.2.7 According to paragraph 95 of the NPPF, Local Planning Authorities should take a proactive, positive and collaborative approach to meeting the requirement for sufficient choice of school places to meet the needs of existing and new communities and to development that will widen choice in education. This will be achieved through the redevelopment of the Quarles Campus.
- 10.2.8 It is considered that as a result of the consolidation of services, there will be no net loss of education services in the Borough and there will be an improvement in respect of the quality of education facilities as a result of the investment resulting from the acquisition. The proposals will result in education benefits, and as such would not contravene stated policies.

*Loss of Sports Pitches*

- 10.2.9 Policy DC18 of the Local Plan seeks to protect playing fields, except for where it can be demonstrated to be surplus to need or where the loss of open space (including playing fields) is accompanied by improvements in the quality of open space. Policy S5 of The London Plan also states that proposals that result in a net loss of sports and recreation facilities will be resisted. The NPPF states that playing fields should not be built on unless an assessment has been undertaken which has clearly shown the open space to be surplus to requirements, or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.
- 10.2.10 Although the site may have only had college use the playing field still does exist and should the development commence, the playing field would effectively cease. As such, the proposal would result in a loss of playing field, which Sport England objected.

10.2.11 The applicant has proposed a replacement pitch at the Brittons Centre in Hornchurch as a way to overcome Sport England's objection in line with Sport England's guidance 'A Sporting Future for Playing Fields of England'. Sport England have requested a S106 Agreement for financial contribution towards the provision of a replacement playing field at the centre. Financial contribution to be spent on new/improved Artificial Grass Pitch at Britons Academy is included in the Head of Terms.

10.2.12 It is considered that the proposals will result in improved sport pitch provision in the Borough and in the context of the underused existing facility are considered to be a benefit of the scheme overall in accordance with relevant policies.

Green Belt

10.2.13 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.

10.2.14 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; 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"*. Whilst this exception is not reflected in the adopted development plan (LDF 2008), it represents up to date Government policy and is therefore a material consideration that carries substantial weight.

10.2.15 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.

10.2.16 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 college layout, its buildings and hard surfaces. The layout approach with parameter plans defining matters such as

development envelopes, building heights, 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.

- 10.2.17 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

- 10.2.18 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.

- 10.2.19 The National Planning Practice Guidance (NPPG) (Paragraph: 001 Reference ID: 64-001-20190722) sets out that, *“assessing the impact of a proposal on the openness of the Green Belt, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:*

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.”*

- 10.2.120 The application site is characterised predominantly by three-storey building centrally located with single-storey building mainly located to the north and south of the site. The whole of the buildings and structures on site are to be demolished. The proposed development would introduce buildings between two and three and a half storeys in height.

- 10.2.21 The accompanying Landscape and Visual Impact Appraisal (LVIA) identifies a series of receptors that will be affected, to varying degrees, by the change of the site as a result of the development. The existing buildings on site are already very visible from the immediate residential surrounds and the LVIA, however, beyond this there are only limited views and glimpses of the site possible through breaks in the trees. The site is visible from within Hatter’s Wood but in the context of tree coverage from within

the wood itself. The proposed development will result in a small amount of tree/hedge removal (loss of 24 trees and four hedges) and will bring development closer to the frontage of the site than the existing buildings and also beyond the extent of the current built form.

- 10.2.22 The LVIA shows when viewed from the other nearby receptors, the development will not compromise visual openness at all nor will it affect the sense of openness when viewed from medium or long distance receptors. The document shows there will be an impact on the sense of visual openness from the residential properties along Tring Gardens, Tring Walk, Tring Close and a section of Priory Close as a result of the increase in built form at the frontage of the site and also to the east where there isn't currently built development. The perception would be of a dispersed and substantially built-up site with reduced openness.
- 10.2.23 The scheme has reduced through pre-application discussions, as a result of both design and Green Belt considerations. The proposal would result in a 14% increase in built form from 35,971m<sup>3</sup> to 41,162m<sup>3</sup>, resulting in an increase in built volume of 5,191m<sup>3</sup>. The existing built footprint on the site is 5,837sqm and the proposed is 4,998sqm showing a reduction of 839sqm (14%) and the amount of built form and hardsurfacing across the site also decreases from 18,254sqm to 12,995sqm, a reduction of 5,259sqm (29%). However, the new buildings would have a combined floor area of approximately 9,854sq.m (currently 8,600sq.m) an increase of 13%. Although there will be an increased amount of landscaped and open areas of 5,028sqm (27%), both the floor area and volume of the proposal are considered to be significant in the context of the Green belt settings of the application site.
- 10.2.24 Notwithstanding the above, it is acknowledged that openness goes beyond physical presence and that the visual sense of openness is a qualitative judgement pertaining to the whole, including disposition of buildings, footprint, height, bulk, mass, roofscape, landscape and topography. Officers are of the view that whilst the reduction in the area of hard surfacing including car park would have a beneficial effect upon openness of the Green Belt, the benefits would not outweigh the harm the proposal in its totality would have to the openness of the Green Belt. It is considered that the massing and dispersal of the proposed buildings would result in an increase in the built up appearance of the site, particularly when viewed from the open land to the north and east, resulting in a reduction in the openness of the Green Belt, and as such considered to be inappropriate development, which should not be approved except where a case of very special circumstances exists.

#### Very Special Circumstances (VSC)

- 10.2.25 The applicant argues that... *if it were to be acknowledged that the site would have a greater impact on the openness of the Green Belt, which is borderline in any event, in line with the NPPF, development remains an 'exception' if it "does not cause substantial harm to the openness of the Green Belt...and contribute(s) to meeting an identified affordable housing need within the area of the local planning authority."* Notwithstanding and in addressing the inappropriateness of the proposal as illustrated above, the applicant has put forward the following VSC case considered to outweigh the identified harm:

#### Significant Education Benefits



- 10.2.26 *"The acquisition of Havering College by the Council was proposed to assist Havering College raise a large capital sum in order to undertake an estate relocation and capital investment plan. Havering College had also been successful in gaining funding through the London Enterprise Panel (LEP) to develop their Construction Infrastructure Skills and Innovation Centre (CISIC) site in Rainham, for which they required 50% match funding.*
- 10.2.27 *Havering College aimed to use the proceeds of the disposal of the Quarles Campus as match funding and to support the further enhancement of the College estate. The original aim was that the Council would seek detailed planning permission for the residential development of the site during a period of College occupation and ownership and that the option to acquire the site would only be exercised if planning permission was forthcoming."*
- 10.2.28 *It is argued that the sale of the site to the Council assists ...the College in maximising the potential for the delivery of CISIC, which is a valuable education facility for residents of the Borough. The College has now vacated the site and the courses are now provided at other Campuses in the Borough. The contribution that this development makes to education provision elsewhere in the Borough should be afforded very significant weight in the assessment of the application.*

Officer comment – This is given limited weight.

Provision of New Housing –

- 10.2.29 *It is argued that Havering is not delivering on its 5 – 10 years housing supply target and that the proposed residential redevelopment of the Quarles Campus will assist in addressing the existing shortfall of housing in the Borough and make a significant contribution to meeting the Borough's annual London Plan targets. That, as contained within the *Housing Trajectory 2019* (Update for the Local Plan Inspector) (August 2020) in reference to the redevelopment of the subject site it is stated:*

*"This is a green belt site which was identified in the LDF as a major developed site. A planning report commissioned by the Council concludes that it is possible to secure limited residential development of the land, given the site is comprised of previously developed land. The Council has subsequently had a capacity study undertaken by Tibbalds, which concluded that the site could accommodate 138 units on this basis."*

and;

*"The unit numbers [138] included represent what can realistically be put on the site taking into account its Green Belt location"*

- 10.2.30 *"The proposed number of dwellings is comfortably below the number of homes that the site has been previously identified as being able to accommodate, whilst taking into consideration its Green Belt location." "The record of housing delivery is seriously low and therefore the delivery of 120 new residential units on this site should be given very significant weight in the assessment of this application."*

Officer comment – This is given limited weight as the site is identified for the delivery of some form of housing in the Local Plan. While the lack of a five-year housing land supply is a "significant" factor, it is not by itself enough to outweigh the harm to the green belt – but is considered to be a major element of the argument.

#### Provision of Affordable Housing

- 10.2.31 The supporting document states that it is relevant to consider both the need as well as the historic delivery in the Borough of the level of affordable housing provision and the proportionate contribution that the proposals would make to that need. It went on to state that the level of affordable housing provision proposed to be provided as part of the development of the site is significant when viewed in the context of the historic poor delivery of affordable housing in recent years.
- 10.2.32 Reference is made to the low level of affordable housing delivery in the Borough as contained the Housing Position Statement (2019) which shows that in 2017 only 3% of the net residential completions were affordable. Further, the most recently published Authority Monitoring Report for the 2017 – 2018 monitoring year states that there were only 7 net affordable completions (2.6% of all homes for the same period). And in respect of tenure there has been zero affordable or social rent unit completions since 2015.
- 10.2.33 The proposal has evolved as part of the pre-application process and now contains a higher level of 3-bedroom units from 11-18 (all social rent), addressing an identified need expressed by LBH Officers. The revised unit mix results in 37.3% affordable housing by habitable rooms (39.2% by unit) with a tenure split of 72.8% affordable rent and 27.2% shared ownership on an integrated basis across the site, is in accordance with the Council's emerging policy requirement on tenure of 70% social or affordable rent and 30% intermediate provision. The slight over provision of 72.8% affordable rent homes will greatly contribute to Council's much needed supply.
- 10.2.34 The provision of 47 affordable units on this site (39.2%) exceeds the percentage delivered at any stage over the period 2004- 2016. The poor supply of affordable homes in the Borough and the substantial contribution the proposals, including the greater provision of 3-bedroom family units, would make to address local need are a material consideration which must be given substantial weight in considering whether the very special circumstances outweigh any harm to the Green Belt.

Officer comment – This is given substantial weight.

#### Deliverability

- 10.2.35 The application is being taken forward by the Council's wholly owned development company, Mercury Land Holdings, who under an ownership arrangement with the Council will acquire the site at full value and implement any planning consent that is granted, ensuring that affordable housing provision is secured for direct Council control and ownership. The Council have partnered with Bellway Homes to deliver the scheme, who provide extensive experience of delivering high quality, affordable homes within sustainable communities nationally. This partnership ensures that the proposals will come forward in a timely fashion, with both affordable and market housing to be provided by 2023. This should carry significant weight in the assessment of the proposals.

Officer comment – This is given substantial weight.

Provision of Public Open Space

- 10.2.36 The proposals include the provision of 1.4 hectare public park in the north-east of the site, which will be accessed by a green spine through the development from Tring Gardens and will represent a considerable public benefit for new and existing residents compared to the currently inaccessible playing fields. Compared to the existing use at the site (which is not publically accessible and which has a low biodiversity value), the provision of a new 1.4 hectare park is a significant improvement which will better serve the local community.
- 10.2.37 Based on the above, it is considered that the provision of significantly improved open space, including a 1.4 hectare cumulatively with the provision of much needed new market and affordable housing represent the very special circumstances which outweigh the minimal harm to the Green Belt.

Officer comment – This is given substantial weight.

*Conclusion*

- 10.2.38 In assessing whether very special circumstances exist, it is necessary to undertake a balancing exercise. Applicants must identify factors that are specific to their site when seeking to argue that very special circumstances apply in their case. At the heart of the NPPF is a presumption in favour of sustainable development. The NPPF outlines, in section 2, three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles. Of particular relevance to this application is an economic role, among others, to ensure land is available in the right places to support growth; a social role to support strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations and by creating a high quality built environment; as well as an environmental role which includes the protecting and enhancing the built environment.
- 10.2.39 The Framework does not require development to jointly and simultaneously achieve planning gain in each of the three considerations. It is sufficient for all three to be considered and for a balance between benefit and adverse effects to be achieved across those three areas. In this instance, the location of the development would be accessible for local amenities and public transport, and would provide additional accommodation in the area to support local shops and services, all in line with Paragraphs 92, 103, 104 and 127 of the Framework. In addition, the development would have the potential to offer a greater range of accommodation which would have some social benefit and encourage diversification of community, as required by Paragraph 61 of the Framework.
- 10.2.40 The proposal would have an economic benefit during the construction phase and a reasonably significant social benefit through the provision of 120 residential units making a moderate but valuable contribution to local housing supply; this is a clear benefit as it reduces pressure on housing land take elsewhere, albeit to a limited degree. Consequently, it is considered that the proposal affords benefits in all areas of sustainability as defined by the Framework, the London and local plans, which

would significantly outweigh the concern regarding future cumulative effect if the development were to be repeated.

- 10.2.41 In balancing the public benefit of this proposal, this is considered to be twofold. 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 39% 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 public access to the site 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 prevailing building design in the area, on balance outweighs the harm to the Green Belt. In light of this justified public benefit, the proposal would give to no conflict with the guidance set out in the above policies.
- 10.2.42 Furthermore, in balance, the proposal results in a reduction of hardstanding and building footprint and the degree of loss of openness is not as much as could be the case for a site in a countryside setting or with previously developed land which was originally associated with a green belt use (e.g. former agricultural buildings).
- 10.2.43 Based on the forgoing and having regard to the fact that there is no presumption against the loss of education facility and training building, the NPPF presumption in favour of sustainable development, the weight accorded the very special circumstances case put forward in support of the application 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 stated policies.
- 10.2.44 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 its locality, which are explored further in the report below.

### 10.3 **Affordable Housing**

- 10.3.1 Policy H4 of the London Plan seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. 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 and the emerging Local Plan Policy 4 seeks at least 35% affordable housing based on habitable rooms and tenure split of 70:30 in favour of social rent. Policy H6 of the London Plan has 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. On the public sector land status of the site, policy H5 state that where there is no portfolio agreement with the Mayor, a minimum of 50% affordable housing by habitable room, must be provided to be eligible for the Fast Track Route (FTR).
- 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 at least 50% of affordable housing and meets the specified tenure mix and other requirements and obligations, are not required to submit viability information. Schemes that do not provide 50 per cent affordable housing will be considered under the Viability Tested Route (Route A). The 50% 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 37.3% affordable housing of the 120 housing units, based on 198 habitable rooms (39.2% in terms of unit numbers). This is broken down as 32 affordable rent units and 15 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 £287,000. The Council tendered an external review of the viability of the altered scheme inputting our private residential values which results in a surplus of c £40,000. This represents 0.1% of overall Gross Development Value, given the low nature of this surplus the scheme is considered to be at breakeven and consider the 35% provision reasonable.
- 10.3.5 Whilst the overall percentage of affordable housing would not be policy compliant (Borough target of 50% affordable housing in line with Policy H6 of the London Plan), it is considered that as the scheme would not fall under Route B of the Mayors SPG, a late review mechanism would be required in this instance, as per the requirements of the Mayors Affordable Housing and Viability SPG. And whilst 35% has been shown to be the viability position, the tenure mix of 72/28 per cent in favour of social rent and the provision of 18 x 3 bed units (47.7%) of the 47 affordable units as affordable rent demonstrate that the proposed tenure split is the maximum reasonable level that can be delivered on this site.

#### Conclusion

- 10.3.6 Officers acknowledge that the level of affordable provision is below the threshold for a public land, officers are satisfied that when considered as a whole, and in the context of the scheme's 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 would be secured by a section 106 agreement.

- 10.3.7 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 D2 states that the density of development proposals should be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services).

##### Density

- 10.4.2 The site is considered to be within a suburban Location and moderate Public Transport Accessibility Level (PTAL) of 1-2.
- 10.4.3 The London Housing SPG 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 150-250 habitable rooms per hectare would be most appropriate for this site in suburban areas with a PTAL rating of up to 3. Policy DC2 of the Local Plan provides for a density range of 30-50 dwellings per hectare for the suburban area of Harold Hill. The emerging Local Plan states that densities should be in accordance with the density matrix set out in the London Plan, however, recognises that density is only one of a number of considerations. This is reflected in the London Plan which removes the density matrix but focuses on optimising site density in Policy D3.
- 10.4.4 The development proposes a density of 32 u/ha or 139 hr/ha. However, the proposed development will provide a 1.4 hectare public open space. After excluding this area from the density calculation, this proposed density equates to 50 dwellings per hectare or 221 hr/ha. Notwithstanding the method used, the proposed development falls within the recommended density range for a sub-urban site such as this with a PTAL rating of 2-3. 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 of the London Plan which sets housing quality and standards.
- 10.4.4 Notwithstanding the ensuing density of 50 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 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 proposals comprise a high quality design which makes efficient use of the site in line with the NPPF, whilst respecting its Green Belt designation as required. 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 (2019) 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 H10 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. The emerging Local Plan Policy 5 states that 'the Council will support development proposals that provide a mix of dwelling types, sizes and tenures. All housing schemes should include a proportion of family sized homes and reflect the recommended housing mix identified in the table below:

	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>
Market Housing	5%	15%	64%	16%
Affordable Housing	10%	40%	40%	10%

- 10.4.7 The development would largely provide two-bed and three-bed units, with a small proportion of one-bed units as set out in the table below:

<b>Unit Type</b>	<b>Private Units</b>	<b>Intermediate Units</b>	<b>Affordable Rent Units</b>	<b>Total Affordable Per Unit Type</b>	<b>Total Units</b>
1bed 2person	4 (3.3%)	4 (3.3%)	4 (3.3%)	8 (17.1%)	12 (10%)
2bed 3 person	0	1 (0.9%)	0	21 (44.6%)	46 (38.4%)
2bed 4 person	25 (20.8%)	10 (8.3%)	10 (8.3%)		
3bed 4 person	44 (36.6%)	0	8 (6.6%)	18 (38.3%)	62 (51.6%)
3bed 5 person	0	0	10 (8.3%)		
<b>Total</b>	<b>73</b>	<b>15</b>	<b>32</b>	<b>47</b>	<b>120</b>

	60.8%	39.2%		
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- 10.4.8 The supporting text to London Plan Policy H10 notes that *“the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.” .... “the need for additional family housing and the role of one and two bed units in freeing up existing family housing.”* The majority of the units proposed are two and three bed, which on balance, provides the required mix in this location. One bed and two bed 3person 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 London Plan. As such, it is considered that the units mix would be appropriate and would accord with development plan policies.

## 10.5 **Design, Character and Appearance of the Area**

### Policy Context

- 10.5.1 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.*
- 10.5.2 The NPPF states (paragraph 130) that ‘permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents’. Paragraph 129 states that ‘applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community’ and this is reinforced in London Plan Policy D2, which seeks the involvement of local communities and stakeholders in the planning of large developments.
- 10.5.3 Policies D3 and D4 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, appearance, shape and form
- 10.5.4 Core Strategy policy CP17 states that new development to ‘maintain or improve the character and appearance of the local area in its scale and design’. Core Strategy policy DC61 states that ‘Planning permission will only be granted for development which maintains, enhances or improves the character and appearance of the local area. Development must therefore: respond to distinctive local building forms and patterns of development and respect the scale, massing and height of the surrounding physical context.’

### Scale

- 10.5.5 The scheme before the Council has been developed through detailed pre-application discussions held with Officers and Quality Review Panel (QRP), as well as members of the Strategic Planning Committee.



- 10.5.6 This application seeks planning permission for the demolition of the existing buildings and erection of 78 two-storey semi-detached and terrace houses and six 3½ storeys identical blocks of flats with accommodation in roof slope.
- 10.5.7 In terms of scale, massing and height, the proposed building heights and massing have been designed, in the main, to be in keeping with that of the existing buildings and those prevailing in the surrounding area.
- 10.5.8 The scale of buildings has been a focus of the design development and has been discussed at length with LBH to ensure that scale and massing is appropriate for this Green Belt location. The quantum of development currently on site, both in footprint and hardstanding areas, as well as 3 dimensional form and height, have been considered and compared to that of the proposals to create a comparable form, but which overall presents various improvements in this sensitive location.
- 10.5.9 The taller buildings are set centrally within the site in areas currently occupied by three-storey buildings, which 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, given the size of the plot and the space that would be retained around buildings, 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.
- 10.5.10 When seen in context of the buildings to be demolished, the prevailing streetscape and taking into account that the building heights range from two to three and half 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 west and north of the wider site. The proposed buildings, although spread more evenly through the southern side of the site, are at the fringes maintained as domestic scale, 2-storey structures and so will maintain and continue the low-scale residential character of Harold Hill. Proposed development at the fringes of the site is generally pairs of semi-detached houses with separation distances of generally 5-6m. Spaces between dwellings is utilised to provide car parking where parking is contained. It is therefore considered that the scale and density of the development does not have an adverse impact on the character of the surrounding.

#### Layout

- 10.5.11 The proposed layout involves the demolition of existing buildings on site, followed by the erection of 120 dwellings comprising of 78 residential houses and 42 residential apartments, which are located within six apartment blocks situated at the middle of the site. The properties have been orientated to ensure they provide active frontages and terminate vistas. Whilst the terrace houses sited at the front of the site have been set back from the front edge of the site, enabling hedges to be planted. The proposed layout of the dwellings, landscaping and car parking has achieved a street design which reduces the dominance of vehicles, thus creating an accessible and friendly environment. The carefully designed layout also

incorporates formal and symmetrical patterns reflecting the character of the immediate surroundings.

- 10.5.12 The road layout identifies an array of vehicular and pedestrian routes, including the 'green link' through the centre of the site creating a more clearly defined street network, which visually breaks up the site's frontage. The location and design of apartment units have been designed to respond to the street network and integrate more sensitively to the existing neighbouring houses. Internally, the street hierarchy involves the two (one mainly for emergency) access roads. The internal central roads provides a loop road, whereby the majority of vehicular traffic is manoeuvred. This enables the road rear of the site, to become a pedestrian friendly street, thus functioning more as pedestrian streets with lower traffic levels. The street hierarchy would be identifiable through the use of materials and would feature shared surfacing to help slow traffic and create a visually interesting surface finish. The shared surface would also show subtle demarcation with trim and laying patterns, thus aiding in separating vehicular traffic from pedestrians and cyclists. The layout of the site would therefore encourage sustainable modes of transport on and off-site.
- 10.5.13 The primary design concept to the layout is to fully integrate the new with the current community and allow access to what was previously unused private amenity space. 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 rear of the site.

#### *Design and Appearance*

- 10.5.14 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 balconies would provide articulation to the façade of the buildings, 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.
- 10.5.15 The proposed buildings have been designed to achieve an architectural cohesion with the immediate surroundings and other architectural influences of traditional flat fronted building with pitched roofs. The appearance would be tradition yet modern and the palette of materials (which would be secured by condition) would seek to complement the 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.
- 10.5.16 The proposal takes cues from the form and layout of housing in the surrounding area, and is now more suburban in character. Officer comments on enhanced quality contemporary detailing have been addressed, such as minimising unsightly fascia boards at roof/wall junctions, and the proportion/alignment of windows. A softer palette of materials has been introduced to improve the way the scheme integrates with neighbouring houses. 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*

- 10.5.17 Policy DC61 requires that new development must harness the topographical and ecological character of the site, including the retention of existing trees and landscape. Policy DC71 seeks to protect and enhance views to and from historic parks and landscapes, including the adjacent Hatters Wood and Dagnam Park
- 10.5.18 Policy DC21 requires major new residential development to include provision for adequate open space, recreation and leisure facilities.
- 10.5.19 Policy DC20 sets standards for the provision of public open space and children's play space which is also covered by Policy G4 of the London Plan supplemented by the Mayor's "Shaping Neighbourhoods: Play and Recreation SPG (2012).
- 10.5.20 The proposal is supported with a landscape strategy and 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.
- 10.5.21 Due to the sensitive nature of this site and its Green Belt location, the landscaped verdant setting of the scheme has been one key driving factor of the development proposals. 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 southeast-northeast, improving and continuing the open space established by the existing buildings. The development comprises two main areas, the area of new homes and the large open space bounded by Hatters Wood that will incorporate a new public park. A central 'green link' from Tring Gardens leads into the new park through the residential area, integrating these two areas.
- 10.5.22 The proposed development illustrates 'buildings within the landscape' comprising existing mature and new enhance planting. A park/open space is proposed as a feature covering the entire width of the site along the northern and eastern part of the site, which is visible from Trings Grdens from the 'green link' through the centre of the site enhancing the setting of the new buildings facing onto Tring Gardens. Aspects such as the removal of the existing boundary railings and hedges 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 50m by 16m wide linear central park/open space would be created.
- 10.5.23 The rear gardens located to the rear of the ground floor flats in the apartment blocks would provide private gardens for the residents of the flats. This area would be enclosed by the close boarded fence . 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 of the apartment blocks, to the front and corner of houses. The main central open space

would be laid to lawn to provide informal play area and would include some play elements.

- 10.5.24 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 and rear landscaped gardens will create separation between the adjacent Hatters Wood and Dagnam Park and adjoining residential properties providing high quality public open space including children's play space.
- 10.5.25 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 majority of existing trees on the site are proposed to be retained, but the proposed design would have an impact on 24 trees, 4 hedges and 1 area of shrubs/scrub whose removal is required to accommodate the proposed layout, and the part removal of 2 groups of trees. The removal of the trees is adequately compensated through the planting of a significant number of new trees, shrubs and hedges as part of the landscape strategy. Officers are satisfied that the approach to tree retention and planting is acceptable and can be properly controlled through the use of appropriate conditions.
- 10.5.26 The proposals have been rationalised to minimise the impact of high levels of parking and incorporate SUDS infrastructure. A high quality green space is created to the north of the site, and the design negotiated improved the way the proposed housing integrates along this edge. The landscaping proposals have been extensively reviewed by officers, who supports the proposals subject condition(s) being imposed, and therefore acceptable with respect to arboricultural impacts.in accordance with Policy DC60 of the LDF.
- 10.5.27 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), 2no. Local Areas of Play (LAP), 2 no. Door Step LAPs and a Youth Space

Refuse (waste management)

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

Each block – 3 bins to serve the 7 flats contained within this block, located in a refuse storage area close to the main entrance.

- 10.5.29 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:

Each block – 2 x 1100 litre bins = 2 bins in total.

- 10.5.30 There will be an over provision by one bin for each of the block.
- 10.5.31 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.
- 10.5.32 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 raised no objection. 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

- 10.5.33 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

- 10.5.34 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 existing and local character. It is considered that the development proposal would be appropriate and would accord with the NPPF and listed policies above..

### 10.6 **Residential Amenity**

#### Residential Amenity for Future Occupiers

- 10.6.1 Policy D6 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 Space

10.6.2 The proposed Masterplan provides 1.4 ha of Open Space. The public open space to the rear of the development site would offer public access to the park. There is also a central linear park creating east west connection through the neighbourhood. The route through would be accessible for all users

10.6.3 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

10.6.4 Policy S4 on 'Play and informal recreation' from the '*London Plan*' 2021 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.

10.6.5 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 89.6 children within the 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 896sq.m playspace is required within the application site boundaries.

10.6.6 The development proposals offer a variety of play and recreational opportunities within the new park, the central green link as well as incidental spaces around the site, which according to the supporting statement, is well in excess of the minimum requirement. Whilst the applicant has provided a landscape design and access statement which identifies children's playspace across the site, there is however, no area-by-area breakdown of playspace areas has been provided and the Landscape Strategy appears to indicate only three areas of playspace across the wider development.

10.6.7 The proposed play areas would be accommodated within the communal open space to provide secure safe environments for the younger children. Whilst there is lack of information on the exact sizes of the allocated play area, officers are of the view that there will be sufficient children play area within the development. This will however be secured by condition. As such, this aspect of the proposal complies with Policy S4 from the '*London Plan*' 2021 and the Mayors SPG on 'Shaping

Neighbourhoods: Play and Informal Recreation' and Policy DC23 of Havering's 'Development Plan Document' 2008.

Entrance and approach/ active frontages

- 10.6.8 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, would be served by single cores.
- 10.6.9 The ground floor of each of the residential blocks would overlook the communal residential areas so that these areas are activated. The houses will all have front entrance facing the communal area. 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

- 10.6.10 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.
- 10.6.11 The residential blocks would be served by a single core which would have access to a lift each of which would be wheelchair standard. Each core would serve two flats in line with that recommended in the SPG.

Dwelling space standards/ internal heights/ flexibility

- 10.6.12 The minimum space standards are set out at Table 3.3 of the London Plan and are reproduced within the SPG.
- 10.6.13 Policy D7 of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4 (2) – 'accessible and adopted dwellings'. The policy 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.
- 10.6.14 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.
- 10.6.15 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.
- 10.6.16 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. This is also reflected in the layout of the 78 houses.

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 at ground level, which have access to private garden area, would have a private balcony space 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 would comply with these minimum dimensions.

Privacy

- 10.6.22 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.
- 10.6.23 The layout of the units would in general ensure that the privacy of individual units would be maintained. In terms of privacy between the buildings, a distance of at least 18m would be maintained between the rear walls of properties with habitable room windows. This relationship is within acceptable separation distance to preventing direct overlooking between each of the buildings.
- 10.6.24 On balance, having regard to the somewhat nature of the proposal and taking into account the layout of the buildings, 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

- 10.6.25 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.
- 10.6.26 All of the units would be dual aspect units, and therefore each unit would receive adequate levels of natural daylight.

Noise

- 10.6.27 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.



- 10.6.28 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.
- 10.6.29 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. The results showed that the noise levels measured were dominated by noise from vehicle movements on neighbouring roads. The survey indicates that in insulation of the adjoining traffic noise, the scheme is relatively quiet.
- 10.6.30 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

- 10.6.31 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).
- 10.6.32 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.
- 10.6.33 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 all dual aspects, and as such 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, would

have an acceptable degree of natural light. As such, it is considered that they would receive a satisfactory level of daylight and sunlight.

- 10.6.34 In relation to impacts on nearby existing dwellings, the elements of the scheme most likely to cause an impact in terms of overshadowing and loss of daylight/sunlight are the proposed flats, all of which are located centrally within the scheme where they will not have any impact on existing dwellings. All other proposed units are double storey attached and semi-detached homes which are sufficiently distant to any existing dwelling that any impact will be minimal, and certainly not material in terms of the amenity of neighbouring residents.

*Impact of Development on Neighbouring Occupiers*

- 10.6.35 London Plan Policy D6 *Housing quality and standards* 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.
- 10.6.36 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.
- 10.6.37 The closest existing residential properties to the site are those in Tring Gardens on the south-western side of the road, Priory Road to the north and Tring Close to the south. Though the properties in Tring Gardens will be approximately 16 metres away from the proposed row of three terrace blocks, they will be front to front separated by the main road, which is a common relationship. The closest property in Tring Close will be sited approximately 24.5m from the new two-storey houses while the nearest in Priory Road will be at least 46m away from the closest new two-storey house. 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.
- 10.6.38 In relation to the properties in Tring Walk, the proposed development will be set at least 23m from the boundary of the closest property and would be flank wall to flank wall with no windows proposed in the flank of the new dwelling. Similarly, officers do not consider that any adverse impact upon residential amenity will result from this relationship.
- 10.6.38 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 London Plan policy T4 states that 'when required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and

strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance'. Policies T2 and T5 relate to healthy streets, the provision of cycle and pedestrian friendly environments, whilst policy T6 relates to parking standards. Core Strategy policy CP9 seeks to 'secure enhancements to the capacity, accessibility and environmental quality of the transport network', whilst policy CP10 reinforces the aims of London Plan Policy T4, which aims to contribute to modal shift through the application of parking standards and implementation of a Travel Plan. These aims are also reflected in Policies 23 and 24 of the emerging Local Plan.

- 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 the use, the impact of construction traffic, servicing, deliveries, pedestrian routes and cycling.
- 10.7.3 The development proposals include closing the existing main access point to the college and adding a new access to the west, with the previous emergency access onto Tring Gardens becoming a secondary access. The proposed site access junction will take the form of a simple priority junction with footways on either side. Appropriate kerb radii and highway width will accommodate the vehicles typically using the access. The application site is located in an area with a PTAL of 1/2 which is considered poor/low and a maximum car parking standard of 2 unit to 1 unit applies. The current application proposes a total of 212 car parking spaces, equating to an average 1.8 space per unit across the site, comprising: 141 spaces for dwelling houses, 42 unallocated parking spaces for apartment residents (1 space per unit), 18 unallocated parking spaces for apartment residents (0.5 spaces per 2-bedroom unit), 8 visitors parking, and additional 3 unallocated parking spaces. There is no information provided about the level of disabled parking spaces nor electric charging points to be installed to meet London Plan requirement. This will however be secured by condition, which is recommended.
- 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 1.5 cycle parking spaces per unit. Cycle parking will be provided for each dwelling, with one space to be provided for each proposed apartment; one space for each 1-2 bedroom dwelling house; and 2 spaces for each proposed 3+ bedroom dwelling house. Each house will be provided with storage space for two bicycles within the curtilage of the house. Communal cycle stores will be provided for flats. 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 (HA) are satisfied with the level of parking being proposed and welcome the level of cycle parking being provided but have expressed

concern that given that the current land use of Havering College will change to residential development, there is the need to future proof the impact that this will create immediately on the residents and within the area. HA as recommended Control Parking Zone / implementation of appropriate parking measures around the development and new zebra crossing is implemented in Whitchurch Road by Tring Gardens in order to mitigate the issues arising in the future. This is to be secured by condition and s106 agreement including Travel Plan, Cycle parking, Servicing, Construction Logistics.

## 10.8 **Flood Risk and Development**

10.8.1 Local Plan Policy DC48 states 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.

10.8.2 The Council's Strategic Flood Risk Assessment maps show that the site is not located in a higher risk flood zone London Plan policies SI12 and SI13 state 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.

10.8.3 The submitted Flood Risk Assessment (FRA) and Drainage Strategy details the proposed surface water drainage strategy, which seeks to restrict the discharge rates as close to the existing greenfield rate as is practicable using an attenuation tank and hydrobrake system, before being discharged to the Thames Water Surface Water sewer network. The proposed SuDS features will reduce the rate of discharge by providing storage during heavy rainfall events, reducing the risk of flooding. The proposed foul water drainage strategy is to maintain the current arrangement of discharging to the existing foul sewer in Tring Gardens. It concludes that the flood risk assessment is that the proposed SuDS features will ensure flood water will be safely contained within the site boundary up to and including the 1 in 100 year event plus 40% climate change. 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**

10.9.1 Policy DC7 of the Local Plan and Policy D7 of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4(2) – 'accessible and adopted dwellings'. Policy D7 A(1) will require 10% of new housing to meeting building regulations M4 (3) – 'wheelchair user dwellings'. Furthermore, The London Plan 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 Paragraphs 151 - 154 of the NPPF relate to decentralised energy, renewable and low carbon energy. Chapter 9 of the London Plan contains a set of policies that require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions ,where the residential element of the application achieves at least a 35 per cent reduction in regulated carbon dioxide emissions beyond Part L Building Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. . Specifically, Policy SI2 sets out an energy hierarchy for assessing applications, as set out below:.

- 1) *Be lean: use less energy*
- 2) *Be clean: supply energy efficiently*
- 3) *Be green: use renewable energy*

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 35.42% reductions in regulated CO2 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 CO2 target reduction:

“Be Lean” – sustainable design and construction measures will be used to improve air tightness, high performance glazing and efficient lighting;

“Be Clean” – highly efficient, individual low NOx boilers (The site is not situated near to an existing or planned district heat network, and on-site CHP and community heating is inappropriate for a development of this nature); and

Be Green” – the installation photovoltaic panels (PV) at roof level and the use of air source heat pumps.

10.10.5 Whilst a detailed design will be necessary to demonstrate that the proposed development will achieve the overall CO2 reduction, it is anticipated that through the above measures the proposal will achieve an overall CO2 reduction of 35.7%. In terms of carbon offset, it is estimate that 112 tonnes of residential CO2 emissions would need to be offset through of site contributions. This is estimated at £201.609. 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 In conclusion, the development would accord with development plan policies. To ensure compliance with these standards, a condition is attached requiring a post occupation assessment of energy ratings, demonstrating compliance with the submitted energy report.

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

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

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

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

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

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

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

#### **10.13 Archaeology**

10.13.1 An Archaeological Desk Based Assessment has been submitted with the application in accordance with current and emerging planning policy, which concludes that in terms of relevant designated heritage assets, no World Heritage Sites, Scheduled Monuments, Historic Battlefield or Historic Wreck sites have been identified within the vicinity of the site. And in terms of relevant local designations, the study site does not lie within an Archaeological Priority Area or an Archaeological Priority Zone as defined by the London Borough of Havering and GLAAS. The study site can be considered likely to have a generally low archaeological potential for all past periods of human activity and on the basis of the available information, no further archaeological mitigation measures are recommended for this site.

10.13.2 Based on the above, it is considered that the proposal accords with the guiding principles of the NPPF, Policies HC1 of the London Plan, DC70 of the LDF, 28 of the emerging Local Plan and the Heritage SPD with regards to archaeology and cultural heritage matters.

#### **10.14 Ecology and Biodiversity**

10.14.1 Policies CP16, DC58 and DC 60 of the Havering Core Strategy seek to safeguard ecological interests and wherever possible, provide for their enhancement. The emerging Local Plan, Policy 30 states that the Council will protect and enhance the Borough's natural environment and seek to increase the quantity and quality of biodiversity by ensuring developers demonstrate that the impact of proposals on protected sites and species have been fully assessed when development has the potential to impact on such sites or species. The policy goes on to state that it will not permit development which would adversely affect the integrity of Specific Scientific Interest, Local Natural Reserves and Site of Importance for Nature Conservation,

except for reason of overriding public interest, or where adequate compensatory measures are provided. The Council has also adopted the 'Protecting and Enhancing the Borough's Biodiversity' SPD (2009). This requires ecological surveys of sites to be carried out prior to development.

- 10.14.2 The submitted Biodiversity Enhancement Strategy shows the proposed development will result in a net increase in the biodiversity value of the site, which is considered to be in keeping with the key principles of the NPPF and relevant local planning policy. A Great Crested Newt Method Statement has been submitted with the application which shows that Great Crested Newts were recorded in four of the offsite ponds located within 500 m of the development site. The report concludes that suitable terrestrial habitat within the site boundaries is likely to be improved in the long term, ensuring the Favourable Conservation Status of great crested newts will not only be maintained but enhanced within the local area as a result of the proposed re-development.
- 10.14.3 Whilst the proposal does not appear to affect any nationally designated geological or ecological sites or landscapes or have significant impacts on the protection of soils, nonetheless, it is important that the proposed enhancements for the site are maximised in terms of their benefit for biodiversity, and consideration should be given to wildlife friendly landscaping to help enhance the ecological biodiversity of the site. Consideration should also be given to the incorporation of bat boxes and species specific bird boxes on or built into the fabric of new buildings.
- 10.14.4 Notwithstanding the above conditions to ensure that the development undertakes the relevant surveys and incorporates appropriate ecological enhancement on site is recommended. Subject to these conditions, it is considered that the development would be acceptable in this regard.

## **11 Air Quality**

- 11.1 The proposed development is located within a designated Air Quality Management Area (AQMA) due to high concentrations of nitrogen dioxide and particulate matter. Paragraphs 110 & 181 of the National Planning Policy Framework and The London Plan policies SI1, SI3, T61 seeks to ensure that development proposals minimise increased exposure to existing poor air quality and make provision to address local problems of air quality, particularly within air quality management areas (which the site is) and where the development is likely to be used by large numbers of people vulnerable to poor air quality (such as children or older people). Development proposals should be at least air quality neutral and should not lead to further deterioration of existing poor air quality.
- 11.2 An Air Quality Assessment has been submitted in support of this planning application to assess the air quality impacts of the proposals. The assessment concluded that following the successful implementation of the suggested mitigation measures during the construction phase, the residual effects of construction dust and emissions from construction activities upon the local area and sensitive receptors although adverse, will be temporary and not significant. And that during the operational phase, the operational assessment has demonstrated that the proposals will have a net positive impact upon existing air quality concentrations compared to the current use. Air quality for future residents is predicted to be good.

- 11.3 However, the Environmental Health Officers has advised that the Air Quality Assessment for the construction phase has shown that the site is Medium to High risk, in relation to dust soiling and Low risk in relation to human health effects. Based on this risk assessment, appropriate mitigation measures need to be set out in a Dust Management Plan, to ensure the air quality impacts of construction and demolition are minimised. This is to be secured by conditions.
- 11.4 The officer went on to note that the Air Quality Note (November 2020) is considered very poor, as the proposed measures to mitigate excess transport emissions would be taken anyway, to satisfy the relevant London Plan policies (e.g. 1 in 5 parking spaces to have EV charging points, spaces for cycling parking etc.). The following mitigation measures should be considered:
- i. An increase in EV charging points (e.g. 20% active, 80% passive, as per the London Plan)
  - ii. Measures to promote sustainable means of transport (e.g. contributions to subsidised or free public bus transport, financial support for cycle purchase or hire, contributions to improved cycle/walk infrastructure etc.). This is to be secured by conditions.
- 11.5 Based on the above and with the suggested mitigation measures in place, it is considered that the proposed development would accord with national, regional and local planning policy in relation to air quality.
- 12 **Financial and Other Mitigation**
- 12.1 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 DC6 of the Havering Local Development Framework Core Strategy and Development Control Policies Development Plan Document (2008) nor meet the objectives of policies H5, H6, and H7 of London Plan.
- 12.2 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. Subject to detailed checking and based on the figures provided by the developer in the submitted CIL form in good faith, assuming the application is approved this year, the CIL would be:
  - Havering CIL: 11204-8600@£125/m<sup>2</sup> (2604m<sup>2</sup> net)= £328,000\*
  - Mayoral CIL: 11204-8600@£25/m<sup>2</sup> (2604m<sup>2</sup> net) = £65,100\*
- \*subject to indexation.
- 13 **Other Planning Issues**
- 13.1 Policy CP17 on 'Design' and Policy DC63 on 'Delivering Safer Places' from LBH's 'Development Plan Document' 2008 falls in line with national and regional planning guidance which places design at the centre of the planning process. The above




mentioned policy piece together reasoned criteria's for applicants to adopt the principles and practices of Secure by Design (SBD). More detail on the implementation of the above policy is provided from LBH's SPD on '*Designing Safer Places*' 2010, this document which forms part of Havering's Local Development Framework was produced to ensure the 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.

- 13.2 The submitted Design and Access Statement has referenced a management and security strategy, benefits of this approach provide a sense of security to its residents and the local community and discourage antisocial behaviour. The statement outlines that the design has been developed with SBD principles in mind following subsequent consultation response by the Designing out Crime Officer. Points raised include improved residential areas (secure access and access control), residential amenity spaces, refuse collection and bicycle storage areas. The Designing Out Crime Officer has raised no fundamental objection to the proposal subject to conditions.

#### 14 **Conclusions**

- 14.1 The proposed redevelopment of the site would provide a high quality residential development which would be a positive contribution to this area of Harold Wood. The site is currently occupied by buildings of a former adult education facility which is characterised by a varied configuration of built forms. The development will result in investment in education services elsewhere in the Borough and allow for existing courses to be run out of modern facilities. 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 undue impact on the openness of the Green Belt and the purpose of including land within it than the existing development.
- 14.2 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, including 37% affordable housing on a habitable room basis and 39.2% by unit; provision of 46% family units to meet the needs of the surrounding area. 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 financial contributions for enhancements to existing sports facilities that are for use by the public.
- 14.3 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.
- 14.4 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.
- 14.5 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.

- 14.6 Subject to planning conditions, the requirement for a S106 agreement, officers consider the proposals to be acceptable and recommend that planning permission be granted.
- 14.7 The decision to grant planning permission has been taken having regard to the National Planning Policy Framework 2019, the policies and proposals in The London Plan (2021), the Havering Core Strategy and Development Control Policies Development Plan Document 2008, the emerging Local Plan and to all relevant material considerations, and any comments received in response to publicity and consultation.

 <b>Havering</b> LONDON BOROUGH	<b>Strategic Planning Committee</b> <b>Date: 17 June 2021</b>
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<b>Application Reference:</b>	<b>P1022.20</b>
<b>Location:</b>	<b>Former RTS Motors, 84-86 New Road, Rainham RM13 8DT</b>
<b>Ward</b>	<b>South Hornchurch</b>
<b>Description:</b>	<b>Demolition of existing buildings, groundworks and construction of a 10 storey building providing 54 new residential units (Use Class C3) with associated 345sqm of flexible retail/commercial floorspace (within Use Classes A1/A2/A3/A4/B1/D1/D2), the creation of a bus loop and new pedestrian routes together with associated access, servicing, cycle parking and landscaping.</b>
<b>Case Officer:</b>	<b>Ben Dixon</b>
<b>Reason for Report to Committee:</b>	<b>The application is a Major proposal supported by an Environmental Statement, and is Referable to the Mayor of London.</b>

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

- 1.1 The application is seeking full planning permission for the redevelopment of the vacant former RTS Motors open scrap yard site, as a residential-led scheme comprising a 10 storey building, providing 54 new residential units with associated 345sqm of flexible retail/commercial floorspace at ground floor level, the creation of a bus loop and new pedestrian routes, together with associated access, servicing, cycle parking and landscaping, including provision of bus stop interchange with the new Beam Park railway station.

- 1.2 The proposed development would be linked to the applicant's adjacent larger scheme at 90 New Road (ref. P1039.19) which received a resolution to grant planning permission from the Strategic Planning Committee (SPC) in January 2020.
- 1.3 The proposed redevelopment of this vacant brown field site, which lies within the London Riverside Opportunity Area, the Rainham and Beam Park Housing Zone, and the Rainham West Site Specific Allocation (SSA 12), to deliver a residential-led scheme is considered to be acceptable in principle in land use terms.
- 1.4 The linked development at 90 New Road is subject to Environmental Impact Assessment, therefore an addendum Environmental Statement (ES) has been submitted with this application. An assessment of the addendum ES has found that the development would not result in unacceptable environmental impact subject to the application of all mitigation measures set out within this report.
- 1.5 The proposed density is within the standard guidance range set out in the now superseded London Plan 2016 (the new London Plan 2021 has moved away from providing suggested densities) and is considered to be acceptable in the context of the surrounding development which also has higher densities.
- 1.6 The proposed development height of 10 storeys is considered to be acceptable when assessed in the wider context of the surrounding developments currently being brought forward within the new Beam Park local centre, with the tallest building heights being 12 and 16 storeys. The 10 storey height is supported by the QRP.
- 1.7 Members may recall considering the proposal as part of an offline pre-application developer presentation to the Strategic Planning Committee on the 11<sup>th</sup> June 2020. Members raised a number of issues for review and clarification, which are addressed in detail within this report.
- 1.8 The proposal does not provide any additional parking and would share the parking provided within Block 1 of the linked development at 90 New Road. Given the close proximity of the site (approximately 110m) to the new Beam Park Station and applicable maximum parking standards (set out in the London Plan 2021), the level of parking proposed across the wider development (90 New Road and the application site) is considered acceptable and policy compliant.
- 1.9 The development would facilitate the delivery of a bus interchange to the new Beam Park railway station for the 365 bus on the new Station Approach road. The delivery of the bus interchange with the new Beam Park railway station is seen as a key strategic transport infrastructure requirement by the Council. The delivery of this bus interchange would strongly accord with the key aims of London Plan Policy T1 (Strategic approach to transport) and is considered to weigh heavily in favour of the scheme.

- 1.10 The development would deliver a high quality, safe and inclusive pedestrian and cycle access route along the new Station Approach Road to the new Beam Park station and local centre, set within a high quality public realm with a carefully considered landscaping scheme.
- 1.11 The proposal does not provide any additional affordable housing above that provided in the linked 90 New Road scheme. The overall provision of affordable housing within the wider development (90 New Road and the application site) would be 36% by habitable room. This has been independently viability tested by specialist viability consultants on behalf of the Council and found to be the maximum viable amount of affordable housing that could be expected to be delivered.
- 1.12 The development incorporates a policy compliant sustainability strategy that employs measures covering: energy, overheating, carbon emissions, drainage, water use, urban greening and biodiversity.
- 1.13 The recommended conditions and S106 legal agreement would ensure compliance with policy requirements, ensure the development is finished to the required high quality as indicated in the application submission, and ensure any negative impacts of the development would be appropriately mitigated.

## **2. RECOMMENDATION**

- 2.1 That the Committee resolve to GRANT planning permission subject to:
  - a) Conditions
  - b) S106 legal agreement to include key matters as set out below at para 2.2.
  - c) Any subsequent revisions required to the S106 for the 90 New Road (ref. P1039.19) development (by the same applicant), to appropriately link the application development to the development at 90 New Road.
- 2.2 That the Assistant Director of Planning has delegated authority to negotiate any subsequent S106 legal agreement including:
  - a. Delivery of the main (southern) section of the bus loop interchange infrastructure, including the bus stop and stand and turning island, on the Station Approach road (as shown indicatively within the land in orange on drawing NRD2-BPTW-50-ZZ-DR-A-0115 Rev CO2
  - b. All reasonable assistance to enable the Council to deliver the section of the bus loop shown indicatively within the land in yellow and bounded by a part red and part broken pink line on drawing NRD2-BPTW-50-ZZ-DR-A-0115 Rev CO2
  - c. Linear Park Contribution sum of £32,501.19: Indexed.
  - d. Bus Mitigation Strategy Contribution sum of £53,100 to be payable to Transport for London but collected by the Council: Indexed

- e. Carbon Offset Contribution sum of £40,149 (Residential - £29,669 and Non Residential - £10,480) or such other figure as approved by the Council based on an approved updated Energy Strategy: Indexed.
  - f. Controlled Parking Zone Contribution sum of £6,048 or such other figure as is approved by the Council: Indexed.
  - g. Restriction of parking permits pursuant to Section 16 of the Greater London Council (General Powers) Act 1974.
  - h. Commuted sum to provide/ improve existing play space locally if the Beam Park Play Space is not delivered.
  - i. A Travel Plan to encourage the use of sustainable modes of transport, including a scheme for submission, implementation, monitoring and review.
  - j. Provision of a training and recruitment scheme for the local workforce during the construction period, in accordance with the provisions of Policy 22 of the Havering Local Plan Proposed Submission.
  - k. Tying the application development into the wider development incorporating 90 New Road (ref. P1039.19), including any required amendments to the agreed S106 for the 90 New Road development.
  - l. Tying the application into the early, mid and late stage viability review to be undertaken for the 90 New Road development.
  - m. Prohibiting the application development from being delivered in isolation to ensure it is delivered as part of the wider 90 new Road development with the approved affordable housing and family accommodation.
  - n. Submission of such further future planning applications (full planning, S73 or S96a) as required to:
    - i) deliver the approved interface between the land in the applicant's ownership and that within the adjacent Beam Park development to include the approved bus loop and bus driver facilities;
    - ii) deliver the required minor amendments to the 90 New Road scheme in respect of linking the application building into Block 1;
    - iii) deliver the required minor amendments to the 90 New Road scheme (Block 5) to ensure the wider scheme continues to provide 10% M4(3) Wheelchair units and 10% Wheelchair accessible parking spaces
    - iv) ensure the timely delivery of the affordable housing, communal amenity space and parking within the approved 90 New Road scheme and that the application scheme shall not be brought forward in isolation from the 90 New Road development.
- All contribution sums shall include interest to the due date of expenditure and all contribution sums shall be subject to indexation from the date of completion of the Section 106 agreement to the date of receipt by the Council.
  - The Developer/Owner shall pay the Council's reasonable legal costs associated with the drafting of the Legal Agreement, prior to the completion of the agreement, irrespective of whether the agreement is completed.
  - The Developer/Owner shall pay the Council's appropriate Planning Obligations Monitoring Fee prior to the completion of the agreement.

- 2.3 The application is subject to Stage II Referral to the Mayor of London pursuant to the Mayor of London Order (2008).
- 2.4 That the Assistant Director of Planning has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

## **2.5 Conditions**

1. Full application – commencement in 3-years
2. Accordance with plans
3. Details of Materials
4. Detailed design drawings for architectural features
5. Details of commercial units
6. Parking design and management plan
7. Detailed design of the bus loop (plan and section drawings, material spec)
8. Details of site levels
9. Inclusive and accessible design
10. Biodiverse green roofs
11. Hard and soft landscaping detailed specification drawings
12. Landscaping Management Plan
13. Details of refuse and recycling storage
14. London City Airport birdstrike
15. Construction Crane operation
16. Provision of approved cycle parking and reprovision for Beam Park
17. Details and Provision of bus driver facilities pod
18. Hours of construction (to match those for 90 New Road)
19. Noise Insulation
20. Contamination – site investigation and remediation
21. Construction methodology
22. Construction and Logistics Management Plan
23. Deliveries and Servicing Management Plan
24. Air Quality Neutral Assessment
25. Air Quality – construction machinery
26. Air Quality – demolition/construction dust control
27. Air Quality – internal air quality measures
28. Air Quality – low nitrogen oxide boilers
29. Unregulated Emissions Minimisation
30. Whole Life-Cycle Carbon Assessment
31. Piling Method Statement
32. Energy Performance monitoring and reporting
33. Digital Connectivity (full fibre)
34. Circular Economy Statement
35. Vehicle access to be provided
36. Wheel washing facilities during construction
37. Details of drainage strategy, including full spec and layout of SUDS

- 38. Secure by design
- 39. Water efficiency (105l or less per head per day)
- 40. Accessible dwellings
- 41. Archaeological investigation prior to commencement
- 42. Bat/bird boxes to be provided

## **2.6 Informatives**

- 1. Statement pursuant to Article 31 of the Development Management Procedure Order
  - 2. Fee for condition submissions
  - 3. Changes to public highway
  - 4. Highway legislation
  - 5. Temporary use of the highway
  - 6. Surface water management
  - 7. Community safety
  - 8. Street naming/numbering
  - 9. Crime and disorder
  - 10. Cadent Gas, Essex and Suffolk Water, Network Rail, and Thames Water comments
  - 11. Letter boxes
- 2.7 The developer will be liable to pay Community Infrastructure Levy (CIL) on commencement of the development. In this regard, the London Mayoral MCIL2 charging rate is £25/sqm for all development, and the Havering CIL (HCIL) for this part of Rainham is £55/sqm for residential development, £175/sqm for supermarkets (over 280sqm), and £50/sqm for all other retail.
- 2.8 Based on the information available at this stage, and subject to final checks, it is calculated that the development would be liable for £122,642.50 MCIL, and the HCIL liability has been calculated as £251,724 for the residential floorspace and £57,557.50 for the commercial floorspace, providing a total HCIL liability of £309,281.50. The HCIL liability has been calculated based on the provision of over 280sqm of flexible commercial space that could be used as a supermarket, therefore the HCIL liability for provision of a supermarket has been applied.

## **3 PROPOSAL AND LOCATION DETAILS**

### **Proposal**

- 3.1 The application is seeking full planning permission and is accompanied by an addendum Environmental Statement (which relates to the linked application ref. P1039.19 at the larger adjoining 90 New Road site).
- 3.2 The proposal comprises the redevelopment of a vacant brownfield site that was previously used as an open scrap yard. The proposed residential-led scheme comprises a 10 storey building, providing 54 new market sale residential units on the upper floors, with 345sqm of flexible retail/commercial floorspace provided at ground floor level.



- 3.3 The residential density of the development would be 180 units per hectare or 480 habitable rooms per hectare. The proposed unit mix would comprise:
- 36 x 2-bed 4-person units (67%)
  - 18 x 1-bed 2-person units (33%)
- 3.4 The application scheme has been designed to connect and plug into the applicant's adjacent larger development at 90 New Road to complete the large perimeter block of the 90 New Road scheme known as 'Block 1'. The 90 New Road scheme was specifically designed in a way that would easily allow the addition of development at the application site to be neatly connected to Block 1 at a later date, if the development of the application site could be brought forward, as is now the case. The 90 New Road development was given a resolution to grant permission by SPC in January 2020.
- 3.5 The proposed corner development on this vacant brownfield site represents the final piece of the new Beam Park local centre and would enable a unified design to be achieved for the buildings, highway and public realm along Station Approach, New Road and within the local centre.
- 3.6 Parking, servicing, communal amenity space and play space would be shared with the 90 New Road scheme. Residential and commercial refuse stores would be serviced from the covered ground floor car park area within Block 1 of the 90 New Road scheme.
- 3.7 Pedestrian access to the residential units would be from the corner of New Road and the new Station Approach Road. The residential cycle parking store would be accessed from New Road, providing convenient direct access to the proposed new cycle route within the Beam Parkway linear park. The cycle store would have an active glazed frontage.
- 3.8 The development includes the provision of carefully considered landscaping along the new Station Approach Road. The landscaping seeks to tie together the adjacent large developments at 90 New Road and Beam Park that are separated by the new Station Approach road, in order to create a coherent feel to the approach to the new Beam Park local centre and railway station.
- 3.9 The development would provide 345sqm of flexible commercial floorspace at ground floor level. The commercial unit would front onto the public realm in the new Beam Park local centre on Station Approach. The commercial unit would complement the 1,000sqm of commercial floorspace provided for within the adjoining 90 New Road development and 3,677sqm provided within the adjacent Beam Park development, helping to create a vibrant and sustainable new local centre, with facilities for existing and new residents. The unit would be at the same floor level as the adjoining commercial floorspace within the 90 New Road development, providing the flexibility for the floorspace to be used

as either a smaller stand-alone commercial unit or as part of a larger unit combined with the adjacent floorspace.

- 3.10 Within the proposed landscaped area a bus stop and bus stand would be delivered in order to facilitate an interchange for the 365 bus route with the new Beam Park railway station (a 'bus loop') within the new local centre.

## **Site and Surroundings**

### The Site

- 3.11 The 0.3 hectare site lies south of New Road (A1306), north of the C2C railway line and is approximately 1.2km to the west of Rainham centre. The site sits at the eastern corner of North Road and the new Station Approach road. The site is opposite (to the south) the junction of New Road and Askwith Road.
- 3.12 The site is a brownfield site, the majority of which was last used for the open storage of scrap vehicles. The site slopes down in a north to south direction and to the west side of the site there is a level change of approximately 1.4m from New Road along the new Station Approach road.
- 3.13 The Council were previously investigating a potential CPO of the main part of the application site, in order to deliver a bus loop that would provide a bus interchange with the new railway station. The applicant also originally wanted to include the site within their wider masterplan for the redevelopment of the adjacent larger 90 New Road site. However, the CPO did not proceed and the applicant brought forward the planning application for the 90 New Road development without including the site. Subsequently, when the CPO did not proceed, the applicant acquired the site in October 2019 with a view to merging it into their larger adjacent development at 90 New Road.
- 3.14 The site lies within an area which is rapidly undergoing significant change, from predominantly industrial character towards a new residential neighbourhood. The site is located at the edge of the emerging new Beam Park local centre and is approximately 110m to the north of the new Beam Park railway station, which will provide direct access to central London in 20 minutes.
- 3.15 The site is covered by numerous planning designations which all seek the delivery of high quality residential-led development to support the formation of a new residential neighbourhood:
- London Riverside Opportunity Area Planning Framework 2015
  - Rainham and Beam Park Strategic Development Area
  - Rainham and Beam Park Housing Zone
  - Rainham and Beam Park Planning Framework 2016
  - Rainham West Site Specific Allocation SSA 12

- 3.16 The site does not form part of a conservation area, and is not located within the immediate vicinity or setting of any listed buildings.
- 3.17 Site constraints that are of material relevance with the works proposed include:
- Potentially contaminated land
  - Air Quality Management Area
  - Flood Zone 3
  - Area of potential archaeological significance.
  - Flight path for City airport
  - Health and Safety Zone

### The Surroundings

- 3.18 The application site is at a key location which forms the interface of the two adjacent larger developments at 90 New Road and Beam Park.
- 3.19 To the east, the site adjoins the applicant's (Clarion Housing) 90 New Road development site, where the SPC have previously resolved to grant planning permission (ref. P1039.19) for 717 new homes and 1,000sqm of commercial floor space in January 2020. Subject to the Mayor's approval at Stage 2 Referral (which is still currently pending) this development is programmed to start in late 2021. The buildings within the 90 New Road development range from 6 to 8 storeys along New Road with taller buildings, up to 12 storeys, to the south of the site, nearer the new Beam Park station and around the heart of the new local centre.
- 3.20 The new Station Approach road which connects New Road to the new Beam Park railway station, runs north-south adjacent to the west of the site. Station Approach will include a landscaped public street space and plaza.
- 3.21 To the west of the site, on the opposite side of the new Station Approach road, is the large scale phased Beam Park (Countryside Properties) development, which straddles the borough boundary of Havering and Barking & Dagenham. The Beam Park development comprises 3,000 residential units, 2 primary schools, health care, commercial and community space and a new railway station. The buildings facing the application site on Station Approach are 7 to 8 storeys high and comprise a health centre at ground / first floor levels with residential above. The tallest buildings within the Beam Park development are 16 storeys and located to the southwest of the application site, close to the new station and around the heart of the new local centre. The construction of the first phase of the Beam Park development (building east to west), which includes the new medical centre, is now well advanced.
- 3.22 To the north of the site, on the opposite side of New Road, are brownfield development sites, at 49-87 New Road and 89-101 New Road, which benefit

from outline and full planning permission for residential development of 4 to 6 storeys.

- 3.23 New Road (A1306) is planned to be significantly improved for pedestrians and cyclists as part of the Beam Parkway Project. The project chiefly comprises the narrowing of the vehicular carriageway, to allow creation of a Linear Park with dedicated cycle lanes (forming an enhanced part of Cycle Route 13) running east-west along New Road, which will pass directly in front of the application site.
- 3.24 There are currently 3 bus routes within 400m of the site: routes 365, 287, 174. The site is an area with low-moderate accessibility, with a PTAL rating of 2, which will improve to PTAL 3 following the delivery of the new Beam Park Railway Station. The station will be approximately 110m to the southwest of the site and is now expected to open in September 2022.

#### **4. Planning History**

##### 90 New Road

- 4.1 The site at 90 New Road has an implemented extant planning permission (ref. P1813.11), granted in 2015, for the provision of 497 private market sale residential units (with no affordable housing provision) and 170sqm of commercial floor space. A Certificate of Lawfulness (ref. E0026.17) was issued in December 2017, confirming that the development has been lawfully implemented.
- 4.2 In January 2020, the SPC passed a resolution to grant planning permission (ref. P1039.19) for redevelopment of the 90 New Road site to deliver: 717 residential units, 1,000sqm flexible retail/commercial floorspace (within Use Classes A1/A2/A3/A4), the creation of new publicly accessible open spaces and pedestrian routes together with associated access, servicing, car parking, cycle parking and landscaping. The resolution to grant was subject to a S106 legal agreement and Mayor's Stage 2 Approval. Following completion of negotiations with the applicant on the S106, the application was referred to the Mayor at Stage 2 on 27 October 2020. The Mayor's Stage 2 Approval is still currently pending. The Stage 2 Approval has been delayed due to the Mayor adopting the New London Plan and applying the more stringent policies, including the fire safety assessment required under Policy D12 (Fire safety) of the London Plan 2021. This has required the developer to redesign the specification for the lifts and provide some further additional information.

##### Former RTS Motors 84 – 86 New Road

- 4.3 Outline planning permission was granted on 21 June 2017 for demolition of all buildings and structures, with subsequent highways, public realm and landscape works to facilitate bus access to the proposed new Beam Park

railway station. This application was brought forward by the Council in preparation for a CPO of the site, however, the CPO was not progressed. Consequently, this permission was not implemented and expired on 21 June 2020.

- 4.4 The current development proposal at the application site has been reviewed by officers and evolved as part of a Planning Performance Agreement (PPA) pre-application process. The proposals were presented to SPC Members on 11<sup>th</sup> June 2020 as an offline (Covid process) Developer Pre-app Presentation. Views expressed by Members are set out below in the relevant section of the report.

#### Beam Park

- 4.5 In February 2019 the Beam Park development was granted planning permission (ref. P1242.17) by the Deputy Mayor for Planning, Skills and Regeneration, using their call in powers. The development provides up to 3,000 homes (50% affordable), 2 new primary schools and nursery, healthcare, multi-faith worship space, leisure and community uses, and a new railway station, with buildings ranging up to 16 storeys. The construction of the first phase of this development (building east to west), which includes the new medical centre, is now well advanced. The new Beam Park station was due to be operational by May 2022, however, indications are that this is now likely to be delayed until September 2022.

#### 49 – 87 New Road (NR09)

- 4.6 In March 2020 outline permission (ref. P0947.17) was granted to a Council Joint Venture for the demolition of all buildings and redevelopment of the site for residential use providing up to 259 units with ancillary car parking, landscaping and access. The Council are looking to progress a CPO of the site in order to allow the implementation this permission.

#### 89 – 101 New Road (NR08)

- 4.7 In August 2018, outline permission (ref. P1229.17) was granted to a Council Joint Venture for the demolition of all buildings and redevelopment of the site for residential use providing up to 62 units with ancillary car parking, landscaping and access. In order for this permission to be implemented the Council would first need to complete the CPO of the site from the current owner and this seems unlikely to happen at this time.
- 4.8 In November 2008 full planning permission (ref. P0251.17) was granted, allowed on appeal, for the demolition of all existing buildings and redevelopment of the site to provide 3 new buildings, ranging from 2 to 5 storeys, comprising 56no. self-contained flats (14 x 1-bedroom, 23 x 2-bedroom, 19 x 3-bedroom), and 3no. 4-bedroom houses, a small commercial

unit to ground floor and associated landscaping, vehicle access, cycle and car parking. This application was brought forward by the current owners of the site who are seeking to progress the permission.

## **5 CONSULTATION RESPONSES**

- 5.1 The following statutory and non-statutory consultees were consulted regarding the application:
- 5.2 Thames Water – With regard to Surface Water drainage no objection is raised subject to the developer following the sequential approach to the disposal of surface water. With regard to Waste Water Network and Sewage Treatment Works infrastructure capacity no objection is raised. The proposed development is within 15m of a strategic sewer, therefore a condition is required to secure a Piling Method Statement.
- 5.3 London City Airport Safeguarding – No objection, subject to conditions to secure details of construction crane operation and anti-aggressive bird management strategy for any green/brown roofs.
- 5.4 NATS Safeguarding – No objection, as the proposals does not conflict with safeguarding criteria.
- 5.5 Environment Agency – No objection on flood risk grounds.
- 5.6 British Pipelines Agency - No objection, as the development would affect any BPA Pipeline apparatus.
- 5.7 London Fire Brigade – No objection - confirm that the proposals are acceptable in terms of firefighting access arrangements, and it will not be necessary to install any additional fire hydrants.
- 5.8 Essex & Suffolk Water – No objection, subject to a new clean water connection being made to the new dwellings.
- 5.9 HSE – No objection based on online consult
- 5.10 Greater London Archaeological Advisory Service, Historic England – No objection, subject to condition to secure a Written Scheme of Investigation for archaeology and all works to be carried out in accordance with the scheme
- 5.11 Metropolitan Police (Designing Out Crime) – No response received
- 5.12 Transport for London (Spatial Planning) – No objection
- 5.13 Transport for London (Buses) – No objection

- 5.14 LBH Environmental Protection (Noise and Vibration) – No objection, subject to conditions to secure details of noise control, ensure plant and machinery does not breach acceptable noise limits, and to ensure the new residential units provide the required level of sound insulation.
- 5.15 LBH Environmental Protection (Contamination) – No objection, subject to conditions to secure a Ground Contamination Investigation and Remediation Strategy.
- 5.16 LBH Environmental Protection (Air Quality) – No objection, subject to conditions to secure an Air Quality Neutral assessment, and a Dust Management Plan; and to ensure Non Road Mobile Machinery (NRMM) complies with GLA emissions guidelines.
- 5.17 LBH Waste and Recycling – No objection, subject to adherence to guidance provided on bins, storage areas, and collection facilities.
- 5.18 LBH School Organisation – No objection, subject to appropriate CIL contributions
- 5.19 LBH Lead Flood Officer – No objection, as the outline drainage strategy is acceptable.
- 5.20 LBH Emergency Planning Officer - No objection – strongly recommend the following measures to improve the resilience of the development:
- Flood risk assessment highlighting especially the surface water risk
  - Raising the level of the building by at least 300mm above local levels
  - Waterproof membrane in the ground floor
  - Waterproof plaster and waterproofing to ground floor
  - Electrics from the upstairs down and sockets high up off the ground floor where applicable
  - Non return valves on the sewerage pipes
  - Emergency escape plan for each individual property
  - Air brick covers where applicable
  - Movable flood barriers for entrances
- 5.21 LBH Highways – No objection, but request that the following matters are addressed:
- Pinch point on eastern footway – try to keep a consistent width from New Road to Beam Park Station;
  - Bus Loop – to be tracked for double decker bus and show execution of bus passing a bus parked in the bus stand;
  - All pedestrian and cycle facilities to meet LTN 1/20 standards
  - Proposed bus shelter at bus stop to meet London Buses / TfL requirements for location close to kerb line.
  - Comments provided by Urban Design Officer also to be addressed

- Request S106 contributions towards delivery of Beam Parkway Linear Park and to fund monitoring of pedestrian and cycle movements along Station Approach to inform any required adjustments for improvement
- 5.22 LBH Beam Regeneration – No objection subject to confirmation that S106 contribution to be secured towards delivery of Beam Parkway Linear Park and confirmation that applicant will deliver the main (southern) section of the bus loop interchange infrastructure and hard landscaping.
- 5.23 Greater London Authority (GLA) – made the following observations at Stage 1:
- **Principle of development:** The proposed mixed-use development of this brownfield site, comprising housing, flexible commercial and public space is supported in principle and would contribute towards the strategic functions within the Opportunity Area in line with Policy SD1 and GG2 of the London Plan 2021.
  - **Affordable housing:** The lack of affordable housing proposed at the site fails to align with Policy H5 of the London Plan 2021. It is acknowledged that the site would be combined with the wider 90 New Road development but would not advance the current affordable housing provision. The scheme viability will need to be robustly assessed by GLA officers who will work closely with the applicant and Council to ensure the maximum amount of genuinely affordable housing is secured.
  - **Urban Design:** The proposal's design presents no strategic issues and the scheme contributes to wider place-making of the Beam Park area.
  - **Environment:** Further information is required on energy and urban greening is required. A circular economy statement is also required.
  - **Transport:** This is a car-free development. Contributions towards bus service improvements and CPZ are required.

## 6 LOCAL REPRESENTATION

- 6.1 A total of 583 neighbouring residential and commercial properties were notified about the application and invited to comment. The application has been publicised by way of site notices displayed in the vicinity of the application site. The application has also been publicised in the local press.
- 6.2 The number of representations received from neighbours, local groups etc. in response to notification and publicity of the application were as follows:

No of individual responses: 1 objection

### Representations

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



Objection from a local resident:

- The proposed high rise tower block is unsightly and inappropriate.

Officer Response

- As set out in the detailed assessment of the design in the relevant section of the report below, the proposed height of the building is considered to be acceptable and the design is considered to be of an appropriate high quality. The height is supported by the QRP. Consequently, it is considered the development would make a positive contribution to the evolution of the local townscape.

## **7 MATERIAL PLANNING CONSIDERATIONS**

7.1 The main planning issues raised by the application that Members of the Committee must consider are:

- SPC Feedback & Developer Response
- Principle of Development (Land Use)
- Density & Site Layout
- Design Approach (including QRP Feedback)
- Viability & Affordable Housing
- Housing Mix
- Quality of Residential Accommodation
- Landscaping & Public Realm
- Transport & Highways
- Energy & Overheating
- Sustainability
- Flood Risk Management & Drainage
- Fire Safety
- Health & Safety / Crime Prevention
- Impact on Neighbouring Amenity
- Archaeology
- Skills, Training & Employment
- School & Health Care Provision
- Housing Delivery Test
- Environmental Statement Assessment
- S106 Contributions & CIL

### **Strategic Planning Committee (SPC) Feedback & Design Response**

7.2 Members may recall previously reviewing and providing feedback on the scheme at pre-application stage, when it was presented as an offline (Covid process) SPC Developer Pre-App Presentation on 11<sup>th</sup> June 2020. The feedback provided by Members is set out below, together with the response provided by the applicant/developer:

### 7.3 SPC Feedback 1

*Confirmation was sought on the density of the development.*

#### Developer Response 1

The density is 180 dwellings per hectare. The Site is located within the Beam Park Centre character area in the Rainham and Beam Park Planning Framework 2016, which indicates that a density of 180-200 dwellings per hectare would be acceptable.

### 7.4 SPC Feedback 2

*Justification is sought for the proposed 10 storey height of the building in relation to the context of the adjacent buildings which would be less tall (up to 8 storeys).*

#### Developer Response 2

The proposed 10 storey building benefits from a landmark location on the junction between Station Approach and New Road. It adds variety to the massing along New Road, whilst also responding to the context set by the approved building heights to the south within the new local centre, and the consented 4, 5 and 6 storey development to the north along New Road.

It is considered that the proposals would create an attractive landmark building that complements the emerging cluster of tall buildings around the new Beam Park Train Station, which is a key gateway location. It will also add visual interest to the street scene along New Road and avoid a monolithic vista. The Site does not lie in close proximity to any conservation areas, protected vistas or listed buildings, and is therefore relatively unconstrained, whilst also being within an area of future good transport accessibility, immediately opposite the proposed Beam Park station and adjacent to bus routes.

The Quality Review Panel thought that the height of the building was appropriate for the location.

### 7.5 SPC Feedback 3

*Further detail is sought about the provision of affordable family housing within the wider scheme, including at 90 New Road.*

#### Developer Response 3

The application will be linked back to the wider 90 New Road scheme with the combined scheme continuing to deliver 35% affordable housing provision on a habitable room basis. It is, however, unlikely that the scheme will support any additional affordable housing provision or 3 bed provision due to the substantial viability deficit that exists.

#### 7.6 SPC Feedback 4

*Confirmation is sought as to whether Havering residents would be offered shared ownership properties 3 months prior to offering them to all eligible people.*

##### Developer Response 4

There are no shared ownership homes proposed within the application scheme. However, on the wider site, including 90 New Road, this is agreed in principle, subject to detailed negotiations on the s106 legal agreement.

#### 7.7 SPC Feedback 5

*Further information is sought as to when the residential units within the scheme are likely to be available for occupation.*

##### Developer Response 5

Construction is due to start on Site in 2021 and it is considered that the first homes will not be occupied until at least 2023.

#### 7.8 SPC Feedback 6

*Further information is sought as to whether money has been put a side to build the new Beam Park station*

##### Developer Response 6

The GLA committed funding (£32.7m) to the station construction on the 12th March 2020 to ensure that it is delivered by May 2022.

#### 7.9 SPC Feedback 7

*There are concerns about whether the proposed parking provision is adequate.*

##### Developer Response 7

Car parking provision is to be maintained at the quantum previously approved by SPC for the 90 New Road scheme. Parking will be offered to 3 bed family homes first and then cascaded down to the 2 and 1 bed homes. The Council is also seeking to implement a new Controlled Parking Zone (CPZ) in the area around the site and new train station.

### **Principal of Development (Land Use)**

- 7.10 In terms of national planning policies, the National Planning Policy Framework 2019 (NPPF) sets out the overarching roles that the planning system ought to

play, including a set of core land-use planning principles that should underpin decision-taking, one of those principles being:

“Planning decisions should promote an effective use of land in meeting the need for homes...” Para 117.

“Planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes...” Para 118(c).

“Planning decisions should promote and support the development of under-utilised land, especially if this would help to meet identified needs for housing where land supply is constrained...” Para 118(d).

- 7.11 As a key part of the strategy for delivering additional homes for London, the London Plan 2021 seeks to optimise the use of land, including the development of brownfield sites, such as the application site. Specifically, Policy SD1 (Opportunity Areas) of the London Plan 2021 identifies designated Opportunity Areas as focal points for intensification. The application site lies within the London Riverside Opportunity Area, which is identified in the London Plan 2021 as being capable of providing at least 44,000 new homes and employment capacity of 29,000 jobs. Within the Opportunity Area, the site sits within the Rainham and Beam Park Area, which is designated as a Mayoral Housing Zone.
- 7.12 Policy CP1 (Housing Supply) of the Havering Core Strategy 2008 expresses the need for a minimum of 535 new homes to be built in Havering each year through: prioritising the development of brownfield land and ensuring it is used efficiently; and developing sites that have a Site Specific Allocation, including those within the London Riverside Opportunity Area. Table 3.1 of the London Plan 2021 supersedes the above target and increases it to a minimum ten year target for Havering (2015-2025) of 11,701 new homes or 1,170 new homes each year. Policy 3 (Housing Supply) of the Havering Local Plan Proposed Submission sets a target of delivering 17,550 homes over the 15 year plan period (2016 - 2031), with 3,000 homes to be delivered in the Rainham and Beam Park Strategic Development Area. Ensuring an adequate housing supply to meet local and sub-regional housing need is key to making Havering a place where people want to live and where local people are able to stay and prosper.
- 7.13 The aspiration for a residential-led redevelopment of the Rainham and Beam Park area was established when the area was designated as a Housing Zone by the Mayor. The ‘Rainham and Beam Park Planning Framework’ 2016 supports new residential developments at key sites, including along the A1306 (New Road), and the Housing Zones in Rainham and Beam Park. Residential-led redevelopment of the site is also supported by the London Riverside Opportunity Area Planning Framework 2015.

The site was previously used for an industrial / storage type use, but it is not formally designated as industrial land. Policy EC7 of the London Plan 2021 makes clear that proposals at non-designated industrial sites should be supported where they have been allocated within a local Development Plan

Document. As the site is allocated in Havering's Site Allocation Policy SSA12 (Rainham West) for residential, ancillary community, retail, recreation, education and leisure uses, the existing industrial / storage use at this site is not protected and the principle of the proposed residential-led redevelopment is supported.

- 7.14 The development would provide 345sqm of flexible commercial floorspace at ground floor level. The commercial unit would front onto the public realm in the new Beam Park local centre on Station Approach. The commercial unit would complement the 1,000sqm of commercial floorspace provided for within the applicant's adjoining 90 New Road development and 3,677sqm provided within the adjacent Beam Park development, helping to create a vibrant and sustainable new local centre, with facilities for existing and new residents. The unit would be at the same floor level as the adjoining commercial floorspace within the 90 New Road development, providing the flexibility for the floorspace to be used as either a smaller stand-alone commercial unit or as part of a larger unit combined with the adjacent floorspace.
- 7.15 In view of the above, the proposed redevelopment of this brownfield site, within the Opportunity Area, to deliver a residential-led development is considered to accord with all relevant land use policies at local, regional and national level, and would support the borough's need to meet its target for delivering new housing. The proposed residential-led mixed use development, in this sustainable and accessible location on the edge of the new local centre, with associated high quality public realm, including facilitation of a bus interchange with the new Beam Park railway station, would contribute towards the strategic functions of the Opportunity Area in line with London Plan 2021 Policy SD1 (Opportunity Areas) and Objective GG2 (Making the best use of land). The proposal is also seen to accord with the aims of London Plan 2021 Policies H1 (Increasing housing supply), E9 (Retail, markets and hot food takeaways) and T2 (Healthy Streets); and Policy 2 (Rainham and Beam Park Strategic Development Area) of the Havering Local plan Proposed Submission. Therefore, the proposal is considered to be acceptable in principle by both Havering officers and the GLA.

### **Density & Site Layout**

- 7.16 The site area is 0.3 hectares and the development would deliver 54 residential units. Therefore, the residential density of the development at the site would be 180 dwellings per hectare. The site currently has low-moderate accessibility with a PTAL rating of 2. However, this will improve to PTAL rating 3 following the forthcoming delivery of the new Beam Park Railway Station in 2022.
- 7.17 The Rainham and Beam Park Planning Framework suggest a development density of between 180-200 units per hectare. The previous, now superseded, London Plan 2016 included a density matrix (at table 3.2) that suggested a density of up to 240 units per hectare in an 'urban/central' context with a PTAL of 2-3 (suggesting higher densities within 800m of a district centre or a mix of different uses). It is important to note that the new London Plan 2021 has now moved away from prescribing suggested densities for development, instead

focussing assessment of the density of a development on the quality of the design, the accommodation and spaces it would provide and how the design would fit within the surrounding townscape context.

- 7.18 It is important to note that density matrixes and other policies covering density are designed to be used only as a guide and not applied mechanistically. It is necessary to assess the design and density of the scheme in relation to its surrounding townscape context. Paragraph 7.1.15 of the Havering Local Plan Proposed Submission states 'Development densities should reflect the density matrix in the London Plan. However, the Council recognises that when determining an application, density is only one of a number of considerations. The density matrix should not be applied mechanistically. The Council will place a high priority on the quality and design of the scheme, the local context and the relationship with surrounding areas when determining whether a scheme is acceptable and will always aim at optimising residential output and densities consistent with the London Plan for different types of location within the borough through encouraging higher densities of housing development in places with good levels of public transport accessibility.'
- 7.19 The proposed residential density would comfortably sit within the range (up to 240 units per hectare) set out in the now superseded London Plan 2016. However, it is necessary to recognise that when assessing a development proposal, density is just one of a number of considerations. There are many other factors such as: context, layout, quality of public realm provided and residential quality, which are key to informing whether a development 'works', whether it creates a sense of place, whether it would deliver an attractive environment where people want to live, and whether it would provide a good standard of living for all residents within the development. These issues are discussed in detail in the relevant sections of the report below, but in summary, it is considered that these would be successfully achieved.
- 7.20 It is considered the development does not exhibit the characteristics of overdevelopment. There is good separation between blocks, no unacceptable overlooking or lighting issues, and the development complies with all space standards and requirements. The development demonstrates it can deliver a high level housing output whilst maintaining the required high standards of design, layout and public realm.
- 7.21 In terms of the context set by surrounding development, it is noted that the density of the 90 New Road scheme, which the SPC previously resolved to grant approval, is 208 units per hectare, higher than the 180 units per hectare proposed for the application development.
- 7.22 Taking into account the townscape context of the surrounding emerging new neighbourhood within the Opportunity Area, close to the new Beam Park local centre and railway station, and following an assessment of the quality of the residential accommodation to be provided and the impact on neighbouring amenity and the surrounding open spaces (as discussed in detail below), it is considered the proposed density is appropriate and acceptable in this location.

- 7.23 The development would provide 345sqm of flexible commercial floorspace at ground floor level. The commercial unit would front onto the public realm in the new Beam Park local centre on Station Approach. The commercial unit would complement the commercial floorspace provided within the adjoining 90 New Road and adjacent Beam Park developments, helping to create a vibrant and sustainable new local centre. The unit would be at the same floor level as the adjoining commercial floorspace within the 90 New Road development, providing the flexibility for the floorspace to be used as either a smaller stand-alone commercial unit or as part of a larger unit combined with the adjacent floorspace.
- 7.24 The development would provide high quality and well considered active frontages at ground floor level, along both New Road and Station Approach. These would overlook the surrounding public spaces, which form part of the new Beam Park local centre, injecting vitality into these spaces, and providing natural surveillance, which would discourage and reduce opportunities for anti-social behaviour and crime. The scheme also includes an attractive clearly visible and welcoming residential entrance on New Road, together with a residential cycle parking store that would be accessed from New Road, providing convenient direct access to the proposed new Beam Parkway cycle route. The cycle store would have an active glazed frontage.
- 7.25 The development includes the provision of carefully considered landscaping along the new Station Approach Road which seeks to tie together the adjacent large developments at 90 New Road and Beam Park which are separated by the new Station Approach road, to create a coherent feel to the approach to the new Beam Park local centre and railway station.
- 7.26 The proposed pedestrian and cycle store entrances for the development, together with the proposed landscaping, would provide for convenient access, space and infrastructure, which would support safe and pleasant walking and cycling routes through the site and plug into emerging new local walking and cycling routes running past the site, in line with the aims of London Plan 2021 Policies T2 (Healthy Streets) and T3 (Transport capacity, connectivity and safeguarding) Part B3.
- 7.27 Within the proposed landscaped area a bus stop and bus stand would be delivered in order to facilitate an interchange for the 365 bus route with the new Beam Park railway station within the new local centre. In this regard the proposal would accord with the requirements of London Plan 2021 Policy T3 (Transport capacity, connectivity and safeguarding) Part B2, C and Part E.
- 7.28 The layout and design of the proposed development is considered to respond appropriately to the urban design guidance within the London Riverside Opportunity Area Planning Framework 2015 and the Rainham and Beam Park Planning Framework 2016.

- 7.29 The general layout plan of the proposed development is considered to accord with Policy DC61 (Urban Design) of the Havering Development Control Policies 2008, Policy 26 (Urban Design) of the Havering Local Plan Proposed Submission, and the Havering Residential Design Supplementary Planning Document 2010.
- 7.30 The design-led approach that has been taken to produce and refine the development proposals and determine the optimum development capacity and housing provision capacity of the site, including the building height and the site layout, is considered to accord with London Plan 2021 Objective GG2 (Making the best use of land) and Policies SD1 (Opportunity Areas), D3 (Optimising site capacity through the design-led approach), D5 (Inclusive design), D6 (Housing quality and standards), D8 (Public realm), D9 (Tall buildings), and H1 (Increasing housing supply). The proposed density at this location within the new local centre and close to the new Beam Park station is considered to accord with London Plan 2021 Policy D2 (Infrastructure requirements for sustainable densities).

### **Design Approach (Including QRP Feedback)**

- 7.31 The open storage of scrap vehicles, associated with the last operational use of the site, did not make a positive contribution to the character or appearance of the area. Therefore, the discontinuance of this use and the redevelopment of the site is welcomed in respect to the positive impact it would have on the visual amenity of the area.
- 7.32 The proposed development comprises a single 10 storey building, which would plug into the applicant's adjoining 90 New Road development. The building employs several design features (its height, position stepping forward of the established building line, and contrasting dark coloured facing brickwork) to successfully frame the prominent corner at the gateway to the new Beam Park local centre and railway station. The development would act as a way finding marker and landmark building, helping to guide people traveling south from New Road into the local centre and towards the new railway station.
- 7.33 The design includes a step in the massing of the building along the Station Approach elevation. This staggering of the mass is considered to successfully break up the façade and make the massing appear slimmer, more elegant and distinct, in line with the recommendations of the QRP.
- 7.34 The detailing and materials proposed for the development have been carefully selected in order to provide the development with its own identity, as a landmark at this prominent and important corner location, whilst also knitting it into the emerging townscape context along New Road and the new Station Approach road, by responding to and referencing the architectural language employed on neighbouring buildings.
- 7.35 The following architectural details are proposed, informed by townscape context analysis, to ensure the proposal sits comfortably as part of the family of new buildings along New Road and Station Approach:



- Contrasting horizontal banding defines the top of the building as found on Blocks 1-4 of the 90 New Road development;
  - Thin contrasting horizontal banding to the elevations as found on Block 6 of the 90 New Road development;
  - The windows between horizontal banding have been paired with recessed brick to create rhythm to the elevation as found on Blocks 1 & 6 of the 90 New Road development;
  - Single windows to the top of the building as found on Block 1 of the 90 New Road development; and
  - Hit and miss brick detailing as found at street level on Block 5 of the 90 New Road development.
- 7.36 The building would be faced in dark brick which would complement Block K (that is located fronting New Road to the west of the application building) within the neighbouring Beam Park development, creating a coherent language along New Road, and the dark brick base mirrors the base of the building in the Beam Park development at the opposite side of the gateway to Station Approach. The use of the dark brick at this location helps create a landmark and wayfinding corner building, highlighting the gateway to the new railway station and local centre.
- 7.37 The building would complete the 'perimeter block' of Block 1 of the applicant's 90 New Road development – inter-connecting, sharing the communal amenity space provided in Block 1 at first floor podium level and sharing the ground floor level covered car parking and servicing provided within Block 1.
- 7.38 The relationship of the development to the approved built form at neighbouring sites has been carefully considered. At 10 storeys, the building would be 2 storeys taller than the buildings that are its direct neighbours on New Road within the approved developments at 90 New Road and Beam Park. However, it is noted that the neighbouring developments (at 90 New Road and Beam Park) do include taller buildings up to 16 storeys in close proximity to the south of the site within the heart of the new local centre and around the new Beam Park station. The height and bulk of the building has been justified through a detailed contextual townscape analysis.
- 7.39 The architecture at ground floor level has been developed to celebrate the entrance to Station Approach with provision of a generous residential entrance positioned to activate the corner of New Road and Station Approach and respond to the opposite corner building in the Beam Park development.
- 7.40 A S96a non-material amendment application is required to make minor amendments to the design of Block 1 of the 90 New Road development to ensure the interface with the application development is fully coordinated and optimised. This would be secured through the S106 legal agreement.

- 7.41 The final design of the scheme has been developed and evolved in a positive way in response to the QRP's assessment and in response to scrutiny and advice provided by the Council's Urban Design Officers throughout the pre-application phase. In summary, the development is considered to represent a high quality scheme that complements the emerging urban form and responds successfully to the townscape context set by the neighbouring large scale schemes at 90 New Road and Beam Park. It is considered the building would sit comfortably in its surroundings. Details of all facing materials and detailed design drawings covering all significant architectural features would be secured by condition.
- 7.42 The design of the proposal, including its layout, height, massing, architectural form, facing materials and detailing, is considered to represent high quality, contextual development which responds appropriately to the emerging townscape character of the surrounding Beam Park area, would make a positive contribution to this emerging townscape and would provide an inclusive environment. As such, the proposed development is considered to accord with London Plan 2021 policies D3 (Optimising site capacity through design-led approach), D4 (Delivering good design), D5 (Inclusive design), D6 (Housing quality and standards), D8 (Public realm), D9 (Tall buildings); Policy DC61 (Urban Design) of the Havering Development Control Policies 2008, and Policy 26 (Urban Design) of the Havering Local Plan Proposed Submission.

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

- 7.43 In line with the requirement of London Plan 2021 Policy D4 (Delivering good design), as part of pre-application discussions, an earlier version of the proposals were presented to the London Borough of Havering's independent Quality Review Panel (QRP) on the 20<sup>th</sup> May 2020. Set out below are the issues raised by the QRP and the developer's response:

#### ***Heights and Massing***

- 7.44 QRP Comment

*The proposed 10 storey height is potentially appropriate here and, along with the step forward, the block could be an effective marker building for the entrance to Station Approach.*

*However, the panel feels that it is currently only a marker in terms of its height and massing. The step forward breaks the discipline of the frontage of 90 New Road and Beam Park and, as such, this needs to be an exemplary building. Much more work needs to be done in terms of the architecture, especially at ground floor level.*

### Developer Response

The architectural appearance of the building has been enhanced via the introduction of the 'step' in the massing and simplified since the QRP meeting. We have also substantially changed the ground floor layout in response to the comments received. We consider the design moves made following the QRP feedback have positively enhanced the design of the scheme.

### ***Architectural Expression***

#### 7.45 QRP Comment

*The significance of the building as a marker demands a high quality and celebratory architecture. The panel feels that the proposed dark brick response is insufficient and inappropriate. The material seeks to replicate the rhythm of the frontage to New Road of the surrounding development and at the same time will create a building that is overbearing.*

### Developer Response

The step in the massing has mitigated the potential for the building to be considered overbearing in nature.

The submitted Design & Access Statement sets out the rationale for the palette of materials proposed and how this relates back to the wider context.

The architecture has been refined in collaboration with Officers and is considered to represent a high quality gateway building.

#### 7.46 QRP Comment

*The panel also feels that the ground floor architecture is too heavy and it would like to see this lightened, for example through the introduction of colonnades to reveal the ground floor uses, to open up the views along Station Approach and to relax the gateway to better signal that this is a point of arrival.*

### Developer Response

The architectural appearance and treatment of the ground floor has been lightened since the QRP meeting.

The residential entrance has been repositioned to address and activate the corner of New Road and Station Approach, whilst also mirroring the entrance to Beam Park opposite, thereby creating a welcoming entrance to Station Approach.

## **Public Realm and Amenity Space**

### **7.47 QRP Comment**

*The current proposals do not make best use of the gateway location of the site and the landscape design does not respond to the opportunity that the generosity of space allows for; too much of it is hard landscaping.*

*More could be done to soften the hard edges and green the sheltered spaces, and the landscape design could better reflect the riverine context of the area, not only softening but also creating a more defined sense of place and specificity.*

#### **Developer Response**

Since the QRP comments above were received the Developer has been working with the Council to amend the landscaping to enable a bus loop to be delivered within the scheme. This has inevitable resulted in some additional hard landscaping but natural greenspace has also been incorporated into the scheme where possible to create some attractive spaces and places to dwell or rest whilst also responding to the desire lines through Station Approach that are required to enable ease of navigation across the space.

At the northern entrance to Station Approach, the landscaping has been positioned against the western edge of the building to create a welcoming entrance.

### **7.48 QRP Comment**

*The treatment of the turning into Station Approach is particularly unfortunate, with the potentially generous space narrowed between planting and the building due to earlier decisions about the location of the pavement.*

*This could be ameliorated by turning the planting towards the space that will be used most by people. For example, currently the more attractive parts of the public realm along Station Approach appear to face towards the road and road edge pavement.*

#### **Developer Response**

Since the QRP comments above were received the Developer has been working with the Council to amend the landscaping to enable a bus loop to be delivered within the scheme. This has inevitable resulted in some additional hard landscaping but additional natural greenspace has been added to the scheme where possible to create some attractive spaces and places to dwell or

rest whilst also responding to the desire lines through Station Approach that are required to enable ease of navigation across the space.

At the northern entrance to Station Approach, the landscaping has been positioned against the western edge of the building to create a welcoming entrance.

7.49 QRP Comment

*Servicing is currently not adequately resolved and is poorly integrated into the design of the public realm, despite its generosity, and the panel feels that this should be rectified, in order to improve both commercial and residential services and improve the experience of the space in use.*

Developer Response

Commercial bin stores have been moved to enable serving via the car park to the rear. This will no longer interfere with the experience of the high quality public realm proposed.

7.50 QRP Comment

*With two development teams (Clarion at 90 New Road and RTS Motors; and Countryside at Beam Park) working independently, it is not clear how Station Approach can become a single, seamless place and the panel feels that much greater collaboration between the two developers will be needed if the space is to become a successful centre rather than be defined as the boundary between two developments.*

Developer Response

Countryside and Clarion are strategic partners that work together on numerous projects. A separate planning Application for Station Approach is to be prepared and submitted in the near future to deliver the successful space that all parties aspire to.

**Layout**

7.51 QRP Comment

*The reconfiguration of the residential units within the building, to reduce the depth of the single aspect units, is to be welcomed and the panel asks that the design team explores the potential for going further.*

*The panel feels that the change in levels at the ground floor poses questions*

*about the viability of the commercial unit and further work is needed to ensure that the layout is appropriate for potential uses here.*

#### Developer Response

All residential units are now dual aspect.

The commercial unit has been relocated to avoid the internal changes in levels that were previously proposed.

#### **Viability & Affordable Housing**

- 7.52 London Plan 2021 Policy H5 (Threshold approach to applications) and Policy 4 (Affordable Housing) of the Havering Local Plan Proposed Submission require that at least 35% of the proposed housing should be provided as affordable housing (of which 70% should be social/affordable rented and 30% intermediate/shared ownership), or it should be comprehensively and robustly demonstrated that the maximum viable quantum of affordable housing would be provided.
- 7.53 Policy DC6 (Affordable Housing) of the Havering Development Control Policies, Policy 4 (Affordable Housing) of the Havering Local Plan Proposed Submission, and Policies H4 (Delivering affordable housing) and H5 (Threshold approach to applications) of the London Plan 2021 all seek to maximise affordable housing delivery in all major development proposals. Policy stipulates that where developments propose to deliver 35% or more affordable housing, at an agreed tenure split, then the viability of the development need not be tested – in effect it is accepted that the 35% (or more) proposed is the maximum that can be achieved.
- 7.54 The applicant's 90 New Road development, as previously resolved to approve by the SPC, will deliver 252 affordable homes with 101 for affordable rent and 151 for shared ownership. Therefore, providing a tenure split for the affordable housing of 40.1% affordable rent : 59.9% shared ownership (by unit). Overall, this equates to 38.35% affordable housing provision by habitable room and 35.15% affordable housing provision by unit (of the 717 units).
- 7.55 It is proposed that the application development would be delivered as an additional annex to the wider 90 New Road development. Due to issues with the viability of both the application development and the 90 New Road development, it is not proposed to provide any additional affordable housing within the proposed development at the application site. The combined wider development, encompassing both the application site and 90 New Road,

would therefore deliver 36% affordable housing by habitable room and 32.7% affordable housing by unit (of the total 771 units).

- 7.56 A Viability Appraisal was submitted with the application to demonstrate the viability issues, which the proposed development is faced with. The Viability Appraisal covers the combined viability of the 90 New Road development and application proposal.
- 7.57 The applicant's Viability Appraisal has been independently reviewed by a specialist viability consultant on behalf of the Council. The independent review concluded that based on present day inputs for build costs and sales values, the proposed development could not viably support a policy compliant affordable housing provision.
- 7.58 The application scheme has been demonstrated to generate a deficit of -£0.85M. When combined with the substantial deficit already demonstrated for the 90 New Road scheme it has been demonstrated the combined development, delivering 36% affordable housing, would generate a deficit of -£24.8M. As the application development would generate a deficit, creating a further increased deficit for the combined scheme with 90 New Road, it has been clearly demonstrated that the proposed application development cannot viably support the delivery of any additional affordable housing above that to be delivered within the 90 New Road development. Therefore, the proposed 36% affordable housing across the combined development is accepted to be the maximum amount of affordable housing that could be delivered at the site.
- 7.59 Notwithstanding the demonstrated viability issues, the applicant is willing and able to deliver a greater level of affordable housing than can viably be justified across the 90 New Road development and combined development with the application site. This is based upon the applicant's unique position as a Registered Provider of affordable housing, and its appetite to maximise the delivery of affordable housing in accordance with Local Plan and the Mayor's policy aspirations to increase the delivery of affordable housing. The applicant has been able to secure affordable housing grant from the GLA, has allocated internal subsidy towards the scheme, and is willing to accept sub market returns in order to make the development viable and maximise the amount of affordable housing that can be delivered across the wider development of 90 New Road and the application site. In this respect, affordable housing provision is considered to be maximised, meeting the objectives of Local Plan and London Plan policies, as well as the stated ambitions for the Housing Zone.
- 7.60 As the application development would not deliver 35% affordable housing, it would not meet the threshold for the GLA's Fast Track viability assessment route. Consequently, as with the 90 New Road scheme, the development would be subject to early, mid and late stage viability reviews to be secured within the S106. If the profitability of the scheme has been found to have increased to such a level as to be able to viably deliver additional affordable housing at any of the review stages then this additional affordable housing would be secured by the S106.

- 7.61 The combined wider development, encompassing both the application site and 90 New Road, would therefore deliver 36% affordable housing by habitable room and 32.7% by unit. In light of the findings of the detailed independent viability assessment, this level of affordable housing provision is considered to be policy compliant and therefore acceptable. However, notwithstanding this, the scheme viability will be further robustly assessed by GLA viability officers, and their housing colleagues, at Stage 2, to explore all options to ensure the maximum amount of genuinely affordable housing is secured, including through the award of additional affordable housing delivery grant from the GLA.
- 7.62 It would be necessary to tie the two developments at 90 New Road and the application site together within a S106 legal agreement, to ensure the application development, comprising solely market sale units, would only be delivered as the 'completing part' of Block 1 of the 90 New Road development (which provides 38.35% affordable housing) and could not be delivered in isolation by the applicant or any other developer, as this would be contrary to policy and unacceptable.

### **Housing Mix**

- 7.63 As the development would not be delivered in isolation as a stand-alone development, but rather as an extension to the wider development at 90 New Road, the proposed housing mix at the application site needs to be considered in the context of the wider overall scheme, as well as its location at the edge of the new Beam Park local centre.
- 7.64 The 90 New Road development, as previously given a resolution to grant permission by the SPC, will deliver 68 family-sized units (3-bed and larger) with 40 of the family-sized units provided for affordable rent, 17 for shared ownership and 11 for market sale. Across all tenures, this equates to 16.4% family housing provision by habitable room and 9.5% by unit, with over 25% of the affordable rent dwellings being made up of houses (not flats) for families.
- 7.65 It is not proposed to provide any additional family-sized units (3-bed and larger) within the development at the application site, with the development comprising a mix of 1-bed and 2-bed flats. Each of the 9 residential upper floors would provide 4 x 2-bed and 2 x 1-bed units. This is noted to accord with the guidance set out in the Rainham and Beam Park Planning Framework 2016, which suggests that within the Beam Park local centre developments should provide a mix of one and two-bed apartments.
- 7.66 The combined wider development encompassing both the application site and 90 New Road would deliver 15.3% family housing by habitable room and 8.8% by unit across all tenures.



7.67 All 2-bed units have 2 double-bedrooms and are adequately sized to accommodate 4-persons in accordance with requirements of Policy 5 (Housing Mix) of the Havering Local Plan Proposed Submission.

7.68 The table below shows the housing mix across all tenures for the application development (RTS), the 90 New Road development, and the combined development of 90 New Road and the application site (the percentage figures are by unit):

All Tenures	1 bed	2 bed	3 bed
Application Site (RTS)	33.3%	66.7%	0%
90 New Road	45.7%	44.8%	9.5%
90 New Road + RTS	44.9%	46.3%	8.8%

7.69 Policy DC2 (Housing Mix and Density) of the Havering Development Control Policies 2008 and Policy 5 (Housing Mix) of the Havering Local Plan Proposed Submission specify an indicative mix for market sale housing. The table below shows the market sale housing mix across the application development, the 90 New Road development and the combined development of 90 New Road and the application site (by unit).

Market Housing	1 bed	2 bed	3 bed	4+ bed
Policy DC2	24%	41%	34%	1%
Local Plan (Proposed)	5%	15%	64%	16%
Application Site (RTS)	33.3%	66.7%	0%	0%
90 New Road	46.9%	50.7%	2.4%	0%
90 New Road + RTS	45.5%	52.4%	2.1%	0%

7.71 Policy H10 (Housing size mix) of the London Plan 2021 encourages a choice of housing based on local needs and the specifics of each site, such as location and constraints. Part A(6) of Policy H10 advises that a higher proportion of one and two bed units are generally more appropriate in locations that are close to local centres and stations.

7.72 The Mayor's Housing SPG states that housing at higher densities close to public transport facilities is especially suitable for one and two-person households. Well-designed one and two-bedroom units in suitable locations can attract those wishing to downsize from their existing larger homes, freeing up existing family-sized housing stock. One bedroom units in new developments play an important role in meeting housing demand, by reducing pressure to convert and subdivide existing larger family-sized homes. The GLA have advised they consider the proposed housing mix of one and two-bed units in this location, close to the new Beam Park railway station and local centre, to be appropriate and compliant with London Plan policy.

7.73 Taking into consideration site development viability issues, site constraints, the design of the proposed development, and the location of the site in close proximity to the new station and within the new local centre (where it would be

reasonable to expect a concentration of smaller units), the proposed overall unit mix and provision of family units within the wider scheme (90 New Road and the application site) is considered to be acceptable in this instance.

- 7.74 The application development would be tied into the 90 New Road development through the S106 legal agreement in order to ensure the application development could not be delivered in isolation and would only be delivered as part of the wider 90 New Road scheme with the family-sized units.

### **Quality of Residential Accommodation**

- 7.75 Policies D4 (Delivering good design) and D6 (Housing quality and standards) of the London Plan 2021 seek to ensure delivery of high quality design for all new housing development, with further detailed guidance provided in the Mayor's Housing SPG.
- 7.76 It is important that any proposal provides high quality accommodation for future residents, including: provision of outdoor amenity space, avoiding single aspect dwellings and satisfactory outlook from habitable rooms.

### **Dual Aspect & Natural Lighting**

- 7.77 There would be 6 units per floor (4 x 2-bed and 2 x 1-bed units) across the upper 9 storeys, accessed off a central corridor, with each floor served by two lifts. All of the units would be dual aspect, providing a good amount of natural light and cross-ventilation. All units would have an appropriate depth to allow penetration of natural light throughout the habitable spaces.

### **Accessible & Adaptable Layout**

- 7.78 All of the proposed units at the application site are designed to meet or exceed the requirements of Part M4(2) of the Building Regulations – thereby classing them as Accessible and Adaptable Dwellings.
- 7.79 Policy D7 (Accessible housing) of the London Plan 2021 also requires that 10% of all new residential units must be designed to meet the requirements of M4(3) of the Building Regulations – thereby classing them as Wheelchair Accessible Dwellings. It is noted that none of the proposed units at the application site are designed to meet the requirements of Part M4(3). In order to resolve this issue and achieve a policy compliant provision of 10% M4(3) units across the combined development, the applicant is proposing to convert 6 M4(2) units within Block 5 of the 90 New Road scheme to M4(3) units (private sale). This would be secured through a S106 legal agreement.

### **Floorspace & Private Amenity Standards**

- 7.80 The units all meet the National Minimum Internal Space Standards for floorspace and storage for their respective occupancy levels as sought by

Policy 7 (Residential design and amenity) of the Havering Local Plan Proposed Submission and the standards sought by Policy D6 (Housing quality and standards) of the London Plan 2021. The layouts of each of the units are efficiently designed, minimising the circulation space to maximise usable living spaces.

- 7.81 Each of the units would have access to an adequately sized and designed, recessed private balcony, which would provide each unit with acceptable, policy compliant private amenity space in accordance with Part F(9) of Policy D6 (Housing quality and standards) of the London Plan 2021.

#### Communal Amenity Space

- 7.82 The development would not provide any additional communal amenity space, above that provided within the 90 New Road development, as it would share the existing first floor podium level communal amenity space garden provided within Block 1 of the 90 New Road development. It is necessary to note that the 90 New Road development provided communal amenity space in excess of that required by London Plan policy. Consequently, the combined development of 90 New Road and the application proposal would continue to provide an overall level of communal amenity space that meets policy requirements and is considered to be satisfactory.

#### Play Space Provision

- 7.83 Policy S4 (Play and informal recreation) of the London Plan 2021, together with the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG provide guidance on play space provision and seek to ensure adequate and suitable provision is made for play and recreation, incorporating good quality, accessible play provision for all ages. The GLA have raised no objections with the proposed play provision and have advised it is seen to accord with London Plan policy.
- 7.84 Policy requirements for play space provision for the 90 New Road development are: 0-3yr – 737sqm and 4-10yr – 757sqm providing a total policy requirement of 1,494sqm. The landscape design for the 90 New Road development provide 2,253sqm of playable space for children in the age range 0-11 within the communal amenity spaces. This exceeds the minimum requirement for the 90 New Road development as set out through the GLA Play Space calculator by 759sqm
- 7.85 The proposed development at the application site would not provide any additional play space above that provided in the 90 New Road development and would make use of the play space provided within the 90 New Road development.
- 7.86 270sqm of 0-3yr play space is provided within the first floor podium level communal amenity space for Block 1. The play space for 4-10 year olds (1,405sqm) is provided to the southeast of the application site within the Garden Square area of the 90 New Road development.

- 7.87 The play space requirement for 0-3 year olds within the podium level amenity space in Block 1 is 102sqm for the 90 New Road development, rising to 140sqm with the expanded demand created through the addition of the application development. Therefore, the provision for 0-3 year olds (270sqm) continues to exceed the minimum requirement by 130sqm even with the addition of the application development.
- 7.88 The play space requirement for 4-11 year olds in the 90 New Road development is 757sqm, rising to 793sqm with the expanded demand created through the addition of the application development. Therefore, the provision for 4-11 year olds (1,405sqm) continues to exceed the minimum requirement by 612sqm even with the addition of the application development.
- 7.89 The over 12's play space for both the application development and the 90 New Road would be provided off-site to the west of the new Beam Park local centre within the Beam Park development. This would be within less than 5 minutes' walk from the site.
- 7.90 In summary the overall development at the application site and 90 New Road would continue to provide a generous amount of high quality, appropriately located designated play space for children of all ages in line with (or in excess of) all policy requirements.
- 7.91 In line with the S106 Heads of Terms agreed for 90 New Road, a commuted sum for play space would be secured through a S106 agreement in case the Beam Park play space is not delivered.

#### Digital Connectivity

- 7.92 London Plan 2021 Policy SI6 (Digital connectivity infrastructure) seeks to ensure that adequate full fibre connectivity infrastructure is provided to all new residential units. As a minimum, Part R1 of the Building Regulations 2010 require all developments to be equipped with at least 30MB/s ready in-building physical infrastructure although full fibre can provide speeds up to 1GB/s. It is confirmed that the development would provide the infrastructure and connections to deliver 1GB/s connectivity to the internet. This would be secured through a condition.

#### Summary of Residential Quality

- 7.93 The proposal is considered to provide high quality residential accommodation, including appropriate high quality private and communal amenity space and play space. As such, the development is considered to accord with London Plan policies D3 (Optimising site capacity through the design-led approach), D4 (Delivering good design), D6 (Housing quality and standards) and S4 (Play and informal recreation).

- 7.94 It is noted that at Stage 1 the GLA has raised no concerns with the quality of the residential accommodation proposed and have advised they consider it complies with London Plan policy.

### **Landscaping & Public Realm**

- 7.95 Particularly careful consideration is required as to the quality of the pedestrian environment and public realm to be provided along the new Station Approach road.
- 7.96 Due to the important location of the application site, this application provides a key strategic opportunity to successfully knit together the large scale regeneration developments at 90 New Road and Beam Park, to facilitate the creation of a coherent new local centre at the heart of the new neighbourhood. This would include optimising the pedestrian connection between the surrounding developments, the new Beam Park railway station and local centre, and the residents of the existing surrounding wider neighbourhood.
- 7.97 The aspiration for the landscape and public realm design is to create a unique sense of place for Station Approach and the new local centre that takes inspiration from references of Rainham Marshes and Rainham Creek, creating a fluid and organic landscape that invites people to pause and dwell (including provision of public seating), whilst also facilitating the free movement of people. The landscaping design has been arranged to respond to predicted key desire lines of pedestrian movement within and passing through the area, particularly with respect to people accessing and departing from the new railway station, including for people making connections for continued journeys by bus, bike and on foot.
- 7.98 The landscaping design brought forward with the application has been successfully evolved iteratively through review and discussions with the Council's Urban Design Officers and the QRP.
- 7.99 The proposed landscaping along Station Approach would successfully link together and coordinate the individual public spaces provided within the 90 New Road and Beam Park developments at Station Square, Garden Square and Central Avenue.
- 7.100 The inspiration for the planting is to create a soft landscape that is biodiverse, robust and provides year round interest with a natural feel. The proposed planting palette has been carefully selected to be suitable for the site conditions (including times of high and low rainfall) and to be suitable and appropriate for future maintenance requirements. The planting would provide seasonal interest

and a variety of tree species will provide a range of heights, forms and textures providing year round interest.

- 7.101 The proposed landscaping, which includes street trees, green roof and carefully selected planting, together with appropriate space and infrastructure to promote safe and pleasant walking and cycling, is considered to accord with London Plan Policies G1 (Green infrastructure), G5 (Urban greening), G6 (Biodiversity and access to nature), G7 (Trees and woodland), and T2 (Healthy Streets).
- 7.102 The approved planting details, together with details of effective and affordable landscape management and maintenance regime would be secured through conditions.
- 7.103 With respect to hard landscaping, the proposed restrained palette of materials would help create a calm environment, which acts as a central node to surrounding developments. Full details of hard landscaping materials would be secured by condition to ensure the required high quality, robust and low maintenance finish is delivered throughout the public realm.
- 7.104 The hard landscaping scheme would also facilitate the delivery of a bus interchange with the new Beam Park station by providing for a bus stop and stand along the Station Approach road, with the ability for busses to turn and loop on Station Approach and head back northwards to New Road. This is discussed in detail below in the 'Bus Travel' section of the report.
- 7.105 The landscaping proposals have been designed to conform with the principles set out in the Urban Structure Plan in the Rainham and Beam Park Planning Framework 2016, which seeks to ensure all schemes are well connected with the adjoining developments and create a coherent and connected public realm across the wider Housing Zone.
- 7.106 The delivery of a high quality, attractive, pleasant, green, accessible and safe area of public realm to the west and south of the development is a key element of the scheme, which successfully seeks to tackle the knitting together of the boundary between the two adjoining large schemes at Beam Park and 90 New Road.
- 7.107 The proposed hard and soft landscaping scheme is considered to represent an appropriate high quality and practical response that delivers a pleasant, safe, secure and inclusive environment. As such, the proposed landscaping is considered to accord with London Plan 2021 policies D3 (Optimising site capacity through the design-led approach), D5 (Inclusive design), and D8 (Public realm).

## **Transport & Highways**

- 7.108 London Plan 2021 Policy T1 (Strategic approach to transport) Part A seeks to ensure that all developments are carefully designed to facilitate the Mayor's strategic target of 80% of all trips in London (including 75% in outer London) to be made by foot, cycle or public transport. Part B of this policy seeks to ensure all developments make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 7.109 As clearly stated in paragraph 10.1.1 of the London Plan 2021, the integration of land use and transport, and the provision of a robust and resilient public transport network, are essential in realising growth within the borough and ensuring places in the borough are connected to each other and the surrounding areas in a sustainable and efficient way. This needs to be supported by an ambitious aim to reduce dependency on cars in favour of increased walking, cycling and public transport use. Without this shift away from car use it will not be possible for Havering to grow sustainably.
- 7.110 Paragraph 10.1.4 of the London Plan 2021 notes that rebalancing of the transport system towards walking, cycling and public transport, including high quality interchanges, will require significant investment, including improving street environments to make walking and cycling safer and more attractive, and providing more, better-quality public transport services and infrastructure, to ensure that alternatives to the car are accessible, affordable and appealing.
- 7.111 The development would be located approximately 110m to the northeast of the new Beam Park railway station. The new station is fully funded and will be part of the C2C rail line, providing a 20 minute commute into Fenchurch Street in central London once operational. The new Beam Park station was due to be operational by May 2022, however, indications are that the opening is now likely to be delayed until September 2022.
- 7.112 Paragraph 10.6.2 of the London Plan 2021 notes that designated Opportunity Areas (such as the location of the application site) offer the potential to coordinate new transport investment with development proposals to embed car-free and car-lite lifestyles from the outset.
- 7.113 Paragraph 10.6.2 of the London Plan 2021 advises that the approach to parking in outer London Opportunity Areas (OAs) should be set out in Opportunity Area Planning Frameworks (OAPFs), complementing the OA mode share target. Through OAPFs, parking provision can vary within an outer London OA to reflect the PTAL score in specific areas, but the overall quantum of parking must not exceed the relevant maximum standard. The Rainham and Beam Park Planning Framework sets a maximum parking standard of 0.5 spaces per one bed unit and 1 space per two bed unit.
- 7.114 The application site is located within an area that currently has a Public Transport Accessibility Level (PTAL) rating of 2 (low-moderate accessibility).

However, with the delivery of the new Beam Park railway station, the PTAL rating at the site will rise to 3 (moderate accessibility).

- 7.115 The concentration of new development close to the new train station and local centre, together with the delivery of improved cycling and walking routes and infrastructure within the surrounding area will help to drive more active and sustainable patterns of travel within the area with reduced need and desire to rely on the use of private motor cars for many journeys.
- 7.116 It is not anticipated that the occupation of the proposed development would generate significant levels of additional traffic within the context of the wider development taking place in the vicinity.
- 7.117 Station Approach has been designed to allow vehicle access from the east, with a carriageway width of 7.5m, parking bays along its western side. Station Approach would be traffic calmed to provide a maximum vehicle speed of 20mph and to provide a safe cycling environment, this would include provision raised tables to facilitate pedestrian and cycle crossing points. It is estimated that Station Approach will carry a maximum two-way vehicle flow of below 300 vehicles per hour at morning and evening peak times.
- 7.118 The proposed pedestrian and cycle store entrances for the development, together with the proposed landscaping, would provide for convenient, inclusive, safe access, space and infrastructure, which would support safe and pleasant walking and cycling routes through the site and plug into emerging new local walking and cycling routes running past the site, in line with the aims of London Plan 2021 Policies T2 (Healthy Streets), T3 (Transport capacity, connectivity and safeguarding) Part B3 and T4 (Assessing and mitigating transport impacts) Part C and Part F.
- 7.119 Within the proposed landscaped area a bus stop and bus stand would be delivered in order to facilitate an interchange for the 365 bus route with the new Beam Park railway station within the new local centre. In this regard the proposal would accord with the requirements of London Plan 2021 Policy T3 (Transport capacity, connectivity and safeguarding) Part B2, C and Part E, and T4 (Assessing and mitigating transport impacts) Part C.

#### Car Parking

- 7.120 London Plan 2021 Policy T6 (Car parking) sets out that 'Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').



- 7.121 Part K of London Plan 2021 Policy T6 (Car parking) is clear that within Outer London boroughs such as Havering, minimum parking standards should only be applied in areas that have a Public Transport Accessibility Level (PTAL) score of 0-1.
- 7.122 It is important to note that the application site is located within an area that currently has a PTAL rating of 2 (low-moderate accessibility), which will rise to 3 (moderate accessibility) with the opening of the new Beam Park railway station in late 2022. Therefore, the application of minimum parking standards at this site would be in clear conflict with Part K of London Plan 2021 Policy T6 (Car parking).
- 7.123 London Plan 2021 Policy T6.1 (Residential parking) requires that new residential development should not exceed the maximum parking standards set out in Table 10.3 of the London Plan 2021. As the site is in an Outer London Opportunity Area with a PTAL rating of 2-3 the maximum parking ratio for the development is up to 0.5 spaces per unit. This would equate to a maximum provision of 27 additional spaces for the proposed development. It is necessary to note that the application development would deliver a mix of 1 and 2-bed units which would have less need for a car parking space than family sized (3-bed or larger) units and the units would be located at the edge of the new local centre with good accessibility to active (cycling and walking) and public transport (train and bus) options together with local facilities (retail, schools, medical and community uses).
- 7.124 The application development is proposed to be plugged into the applicant's larger adjoining development at 90 New Road. The 90 New Road development, as previously granted resolution to approve by the SPC, will provide a parking ratio of 0.47 parking spaces per residential unit, with 10% wheelchair accessible spaces.
- 7.125 It is proposed that the approved parking and servicing for the 90 New Road development would be shared with the application development. With the inclusion of the proposed additional 54 units in the application scheme, the total number of residential dwellings across the combined development would be 771 with 344 parking spaces provided (including 72 disabled access spaces). This would equate to a parking ratio of 0.45 spaces per dwelling (a marginal reduction in the parking ratio of 0.02 from that approved for the 90 New Road development on its own). The ground floor level covered parking area within Block 1 of the combined development would provide a total of 46 parking spaces (including 7 disabled access spaces).
- 7.126 For context, it is useful to note that for Phase 1 of the large scale neighbouring Beam Park development the approved parking ratio is 0.34 spaces per dwelling.
- 7.127 The maximum standard suggested in the Rainham and Beam Park Planning Framework for a development of this indicative mix would be 588 spaces. Notwithstanding this, it is necessary to be mindful that the site would be located

close to the proposed Beam Park station and consequently accessibility levels will significantly increase once the station is operational.

- 7.128 In line with London Plan 2021 Policy T6 (Car parking) Part C, in order to manage parking in the surrounding area, and prevent increased demand for on-street parking from future residents of the new developments, the Council is seeking to implement a new Beam Park Controlled Parking Zone (CPZ) in the vicinity of the application site. The CPZ is proposed to cover both existing streets and the new streets formed as part of the developments being delivered.
- 7.129 In light of the proposed introduction of a new CPZ, the applicant has developed an approach to car parking provision and management on the assumption that the proposed development would need to be “self-sufficient” in respect of its car parking provision. It is proposed that future residents occupying the development (except for blue badge holders) would not be eligible to apply for car parking permits within the new CPZ area. The applicant has agreed to the payment of a contribution of £6,048 towards establishing the proposed new CPZ. This contribution, together with removal of the rights of future residents of the development to apply for on-street parking permits, would be secured within a S106 legal agreement.
- 7.130 As already agreed for the 90 New Road development, the applicant would implement a car parking management strategy, which would cover allocation of car parking spaces within the development, which would, in the first instance, seek to allocate car parking spaces proportionate to the tenure split on a percentage basis.
- 7.131 Within the 90 New Road development, car parking spaces for affordable rent units would be allocated in locations in the proximity of the units and be specifically allocated for use by residents in this tenure only. These car parking spaces would not be attached to a specific property in order to allow flexibility over the life of the development. The Council’s Registered Providers Housing Officer would allocate car parking spaces to individual families housed within the affordable units according to need. These spaces can also be swapped if needed by prior agreement with the Housing Officer.
- 7.132 As a general rule, across the combined development (including the application proposal), the car parking spaces provided for shared ownership and private sale tenures will be allocated to 3 bed units first and cascaded down the unit sizes. In some circumstances, car parking may be allocated to specific 1 or 2 bedroom units based on sales consultant advice. Units will be sold together with a specific car parking space (exclusive right to use) and the allocated space confirmed in the corresponding unit lease.
- 7.133 Within the 90 New Road development, the applicant has previously agreed to deliver provision of 2 car club spaces, which would be available to use by the residents of the application development. Car clubs are a mode of transport which compliments the public transport upgrades being proposed for the local area. Car clubs are attractive to buyers and tenants as their property comes with access to a car without the high purchase and running costs. In addition,

car clubs contribute towards reducing congestion and encourage a sustainable and economical alternative to car ownership.

- 7.134 As previously agreed within the 90 New Road scheme, 20% of the parking spaces provided within the combined development will be installed with active electric vehicle charging points and a further 20% will be provided with provision for a future charging point (known as passive provision).
- 7.135 London Plan 2021 Policies T6 (Car parking) Part E and T6.1 (Residential parking) Part G require appropriate provision of parking for disabled Blue Badge holders. The proposed development will utilise the covered ground floor parking which has already been agreed for Block 1 of the 90 New Road development. The parking within Block 1 includes 7 disabled parking spaces to be shared across the 216 residential units. This equates to 3% provision of disabled parking spaces from the outset as required by London Plan 2021 Policies T6 (Car parking) Part E and T6.1 (Residential parking) Part G. The wider 90 New Road scheme includes a total of 72 disabled parking spaces, which with the additional proposed 54 units (totalling 771 units) equates to 9.3% provision overall. In order to meet the policy requirement of demonstration that 10% provision (an extra 0.7% or 5 disabled parking spaces) could be provided at a future date if required, a Parking Design and Management Plan demonstrating how this could be achieved would be secured by condition.
- 7.136 Subject to a robust car parking management strategy, and implementation of the new CPZ, the proposed parking provision is considered to be appropriate and acceptable in this location. This element of the proposal is considered to accord with London Plan 2021 Policies T6 (Car parking) and T6.1 (Residential parking), Policy 24 (Parking provision and design) of the Havering Local Plan Proposed Submission, and Policy DC33 (Car Parking) of the Havering Development Control Policies 2008.

#### Bus Travel

- 7.137 There are currently 3 bus routes with stops within 400m of the site: routes 365, 287, 174.
- 7.138 In line with the vision set out in the Rainham and Beam Park Planning Framework 2016, the scheme would facilitate the delivery of a bus interchange for the 365 bus (which provides connection north up to Romford Town Centre) with the new Beam Park railway station, by providing for a bus stop and stand along the east side of the new Station Approach road. The interchange would allow busses to turn and loop on Station Approach and head back northwards to New Road.
- 7.139 The bus loop would be surfaced in a different colour tarmac to distinguish it as a 'bus only' area. It is proposed to signalise the Station Approach road junction with New Road in order to allow buses to turn in and out safely. The proposed junction will be incorporated into the Beam Parkway scheme for

New Road which includes a segregated east-west two-way cycle lane along the southern side of New Road. Full details of the final design of the bus loop, including plan and section drawings and a detailed specification of all materials would be secured by condition.

- 7.140 TfL have advised of a need to provide a bus driver facilities pod close to the proposed bus stand. It is proposed to provide this pod to the south of bus stand and its delivery shall be secured by condition.
- 7.141 It is proposed that the Council would deliver the northern most section of the works required to facilitate the delivery of the bus interchange around the junction with New Road and the new Beam Parkway cycle route. This is shown as the land in yellow and bounded by a part red and part broken pink line on drawing NRD2-BPTW-50-ZZ-DR-A-0115 Rev CO2. The applicant has agreed to deliver the larger southern section of the bus interchange and this is shown as the land in orange on drawing NRD2-BPTW-50-ZZ-DR-A-0115 Rev CO2.
- 7.142 In line with London Plan 2021 Policies T4 (Assessing and mitigating transport impacts) Part C and T9 (Funding transport infrastructure through planning) Part C, the delivery of the main southern part of the bus interchange infrastructure, within a reasonable and appropriate timeframe, by the applicant, shall be secured through a S106 Legal Agreement.
- 7.143 The delivery of the proposed bus interchange with the new Beam Park railway station is seen as a key strategic transport infrastructure requirement by the Council. The delivery of this bus interchange would strongly accord with the key aims of London Plan Policy T1 (Strategic approach to transport) and is considered to weigh heavily in favour of the scheme.
- 7.144 TfL have requested a Bus Mitigation Strategy Contribution of £53,100 to be secured through S106 legal agreement, in order to fund improvements to the local bus service provision to meet cumulative increases in demand from development in line with the requirements of London Plan 2021 Policy D2 (Infrastructure requirements for sustainable densities). Following discussions between TfL Buses and the applicant, TfL have confirmed agreement that some of the Bus Mitigation Strategy Contribution secured for the combined development including 90 New Road could be used to fund the delivery of the bus interchange. This would be secured through a S106 legal agreement for this application and amended S106 agreement for the 90 New Road application.

### Cycling

- 7.145 National Cycle Network Route 13 passes along the stretch of New Road to the front of the proposed development. The proposed Beam Parkway Linear Park project for New Road includes a segregated east-west two-way cycle lane along the southern side of New Road. This would deliver significantly improved and safer cycle facilities for use by the future occupants of the proposed development.

- 7.146 In line with London Plan 2021 Policies T4 (Assessing and mitigating transport impacts) Part C and T9 (Funding transport infrastructure through planning) Part C, a contribution towards the delivery of the Beam Parkway Linear Park cycle route would be secured within a S106 Legal Agreement. The contribution sought would be £32,501.19 (indexed).
- 7.147 Convenient and practical access is proposed for the residents' secure internal cycle parking store within the development. Access would be directly onto the Beam Parkway Linear Park cycle route on New Road. Table 10.2 of the London Plan 2021 attached to Policy T5 (Cycling) requires 1.5 spaces per 1-bed unit and 2 spaces per 2 –bed unit for residents of the development – totalling a requirement for 99 secure long stay spaces, together with 3 short stay spaces for visitors. The internal cycle store within the development would provide secure and naturally surveilled space for the parking of 100 cycles. There would also be on-street provision of 11 visitor spaces and 3 secure spaces for the commercial unit. The cycle parking provision is seen to accord with the requirements of London Plan 2021 Policy T5 (Cycling) as set out in Table 10.2 and its delivery would be secured by condition.
- 7.148 Additionally, as part of the application site along Station Approach includes land owned by Countryside (the developer for the adjacent Beam Park scheme), it is proposed to reprovided 16 secure (caged) cycle parking spaces and 22 open Sheffield stand cycle parking spaces as previously approved within Phase 1 of the Beam Park development. This would also be secured by condition.

#### Pedestrian Movement

- 7.149 The landscaping design for Station Approach would provide 2m wide footways on both sides, which complies with TfL Healthy Streets guidance and TfL Comfort Guidance for London (Version 2 issued 2019) for 'low pedestrian flow' streets with less than 600 people per hour using the footway.
- 7.150 The proposed landscaping design, including space and infrastructure to support pleasant and safe walking and cycling, is considered to accord with the aims of London Plan 2021 Policy T2 (Healthy Streets). The provisions for cycle parking and access to safe convenient cycle routes is considered to accord with London Plan 2021 Policy T5 (Cycling).

#### Servicing

- 7.151 The application development would plug into the residential and commercial waste storage and collection arrangements that have already been assessed and agreed for Block 1 of the 90 New Road development, with collection from the ground floor undercroft parking area in Block 1. The refuse truck will be able to reverse into the car park and then bins dragged to the truck. It has been demonstrated that these arrangements represent a convenient, safe and accessible solution to waste storage and collection which accord with Policy DC40 (Waste Management) of the Havering Development Control Policies

2008, Havering's Waste Management Practice Planning Guidance and London Plan 2021 Policy D6 (Housing quality and standards).

- 7.152 London Plan 2021 Policy T7 (Deliveries, servicing and construction) Part G requires that development proposals facilitate safe, clean and efficient deliveries and servicing. It is considered that the development makes adequate provision of off-street space for servicing, storage and deliveries to meet policy requirements. A Delivery and Servicing Plan would be secured by condition.
- 7.153 In accordance with London Plan 2021 Policy T7 (Deliveries, servicing and construction) Part K, it would be necessary to ensure that during the construction phase of the development, inclusive and safe access for people walking or cycling around the development site is maintained. This is of particular importance with respect to the use of Station Approach to access Phase 1 of the neighbouring Beam Park development which will soon begin to be occupied and in respect to access to the new Beam Park railway station which is due to open by the end of 2022. A Construction and Logistics Management Plan detailing how this would be secured and managed would be secured by condition.

#### Highways Summary

- 7.154 The Council's Highways Officer has reviewed all of the transport and highways related matters and has raised no objections to the development subject to .....
- 7.155 The integration of the development into emerging new active travel (walking and cycling) networks through neighbouring developments and along the new Beam Parkway Linear Park, together with easy access to improved public transport services (train and busses) are considered to accord with London Plan Policy D2 (Infrastructure requirements for sustainable densities).
- 7.156 The proposed pedestrian and cycle store entrances for the development, together with the proposed landscaping, would provide for convenient access, space and infrastructure, which would support safe and pleasant walking and cycling routes through the site and plug into emerging new local walking and cycling routes running past the site, in line with the aims of London Plan 2021 Policy T2 (Healthy Streets).
- 7.157 The proposal's integration with existing and emerging transport access and infrastructure is considered to accord with London Plan 2021 Policy T4 (Assessing and mitigating transport impacts) Part A. In order to meet Part B of Policy T4, the applicant will need to provide a Travel Plan. This would be secured by condition.
- 7.158 TfL have assessed the proposals and confirmed their support. It is considered that the development would provide an acceptable and safe highway environment for the full range of users including buses, cars, delivery vehicles, cyclists and pedestrians.

- 7.159 It is considered the development would minimise any negative impacts on the transport network and minimise potentially harmful public health impacts related to transport by enabling physical activity from walking, cycling and using public transport and appropriately mitigating impacts and issues of air quality and road danger.

### **Energy & Overheating**

- 7.160 London Plan 2021 Policy SI 2 (Minimising greenhouse gas emissions) requires that all new developments are net zero-carbon. The application development would employ low carbon and renewable energy, and has been designed around the London Plan principles of being lean, clean and green, which are consistent with those applied for the 90 New Road development.
- 7.161 The commercial unit has been designed to achieve a BREEAM rating of 'Very Good'. The residential units have been designed to achieve London Plan 2021 Policy SI 2 (Minimising greenhouse gas emissions) compliance by incorporating a high standard of fabric energy efficiency, including high specification insulation, a high degree of air tightness with Mechanical Ventilation Heat Recovery (MVHR), reduced thermal bridging, passive energy saving design features, air source heat pumps (ASHP), and roof-mounted Photovoltaic (PV) panels.
- 7.162 An ambient communal heating loop would supply suitable base heat to provide hot water for all residential units. The heat input for the heating loop would be provided by roof-mounted ASHP. The commercial unit would be supplied by a separate reversible ASHP capable of providing both heating and cooling as required. Roof-mounted PV panels would contribute renewable energy to the development's electricity supply. Any additional energy required would be by grid electricity, which continues to decarbonise over time, meaning there would be no need for any direct use of fossil fuels within the development.
- 7.163 The Energy Strategy for the development targets as a minimum 35% reduction in CO<sub>2</sub> emissions beyond the baseline of Part L of the Building Regulations 2013. The Energy Strategy indicates the development would achieve 82% reduction in regulated emissions for the residential element of the development and 42% reduction in regulated emissions for the non-residential part of the development.
- 7.164 Regulated emissions for the whole development (residential and commercial use) have been calculated. The regulated emissions for the residential part of the development over a 30 year period are 312 tonnes of CO<sub>2</sub>, resulting in a requirement for a carbon offset payment (based on £95/tonne CO<sub>2</sub>) of £29,669. The regulated emissions for the commercial part of the development over a 30 year period are 110 tonnes of CO<sub>2</sub>, resulting in a requirement for a carbon offset payment (based on £95/tonne CO<sub>2</sub>) of £10,480. Therefore, the total carbon offset payment required is £40,149. This would be secured within a S106 legal agreement and then ring-fenced for use by the Council to fund delivery of carbon reduction projects within the borough.

- 7.165 In line with the requirements of London Plan 2021 Policy SI 2 (Minimising greenhouse gas emissions) Part E, the applicant has provided details of the unregulated carbon emission for the development.
- 7.166 London Plan 2021 Policy SI 2 (Minimising greenhouse gas emissions) Part F, requires a Whole Life-Cycle Carbon (WLC) Assessment for the development, which demonstrates actions taken to reduce life-cycle carbon emissions. It should be noted that provision of a WLC assessment is a new requirement set out in the London Plan 2021 which was not in place when the application was submitted in July 2020. Therefore, it is considered appropriate to secure the WLC assessment by condition. It is noted that the applicant would need to provide the WLC before the GLA would assess the development at Stage 2.
- 7.167 Monitoring and reporting on the energy performance of the development to the GLA for a period of 5 years post occupation would also be secured by condition.
- 7.168 The site is located within a Heat Network Priority Area, but is not able to connect to any available existing heat networks. Therefore, in line with London Plan 2021 Policy SI 3 (Energy infrastructure) it necessary to ensure the development is future proofed with the ability to simply and cost effectively connect to any future heat networks that may be delivered within the area. This would be secured within a S106 Legal Agreement.
- 7.169 The development is designed based on a passive solar concept which seeks to maximise the use of solar energy for heating during winter, while reducing the impact of solar heating during warmer months to manage potential overheating. This includes having no north facing single aspect units, utilising inset balconies to provide solar shading of rooms, and utilising air source heat pumps on the roof of the building.
- 7.170 The proposed development has been assessed for overheating using the CIBSE AM11 methodology for dynamic thermal simulation. All residential units were found to comply with the requirements of CIBSE TM59 Guidance, subject to provision of internal blinds to provide shading when required. It is considered the development would accord with London Plan 2021 Policy SI 4 (Managing Heat Risk).

### **Sustainability**

- 7.171 The development incorporates a policy compliant sustainability strategy that employs measures covering: green energy, overheating management, urban heat island reduction, carbon emission reduction, sustainable drainage, water use management, urban greening, promoting biodiversity, and encouraging sustainable transport and travel.
- 7.172 London Plan 2021 Policy SI 5 (Water infrastructure) requires new residential development to be designed so that mains water consumption is 105 litres or less per head per day. This would be secured through a condition. The non-



residential units have been designed to achieve BREEAM 'Very Good', in accordance with LBH Core Strategy and Development Control Policy DC49.

- 7.173 Opportunities for delivering green infrastructure provision, including provision of a biodiverse green roof on the building, have been utilised across the site. It is noted that the Urban Greening Factor (UGF) for the development of the site would be 0.24. It is noted that this would be below the target scores of 0.3 for commercial development and 0.4 for residential development. However, it is acknowledged that due to the nature of the site and the proposed development, which includes a large proportion of public realm and highway and transport infrastructure (including the Station Approach road and the new bus interchange), it is difficult to green this large proportion of the site making a higher UGF score difficult to achieve. When the highway and bus interchange areas are discounted from the calculation a much more positive UGF score of 0.43 would be achieved. As such, given the constraints of the site, it is considered that the development would accord with requirements of London Plan 2021 Policy G5 (Urban greening).
- 7.174 The proposed green landscaping, which includes street trees, green roof and carefully selected sustainable low-maintenance planting is considered to accord with London Plan Policies G1 (Green infrastructure), G5 (Urban greening), G6 (Biodiversity and access to nature), and G7 (Trees and woodland).
- 7.175 Policy G6 (Biodiversity and Access to Nature) Part D of the London Plan 2021 requires development proposals to manage impacts on biodiversity and aim to a secure net biodiversity gain. The Applicant has submitted an ES which assesses this planning application in conjunction with the Full Planning Application for 90 New Road. It concludes that there will be no significant residual adverse effects upon ecology and wildlife as a result of the Development. Rather, the proposed mitigation measures and enhancements (ecological corridor, rain gardens and biodiverse green roofs) would result in an overall increase in the ecological value and diversity of the habitats present within the site and its surrounding environs.
- 7.176 The application site lies within an Air Quality Management Area. London Plan 2021 Policy SI 1 (Improving air quality) requires that all developments must demonstrate that they would be at least Air Quality Neutral, through the submission of an Air Quality Neutral Assessment (AQNA). It should be noted that provision of an AQNA is a new requirement set out in the London Plan 2021, which was not in place when the application was submitted in July 2020. Therefore, it is considered appropriate to secure the AQNA by condition. It is noted that the applicant would need to provide the AQNA before the GLA would assess the development at Stage 2.
- 7.177 It is expected that proposed development and its construction methodology should be designed to reduce waste, recycle material and promote the circular economy aim of pushing to deliver net zero-waste. In order to ensure the proposed development would comply with London Plan 2021 (Reducing

waste and supporting the circular economy) Part B submission of a Circular Economy Statement (CES) is required. It should be noted that provision of a CES is a new requirement set out in the London Plan 2021, which was not in place when the application was submitted in July 2020. Therefore, it is considered appropriate to secure the CES by condition. It is noted that the applicant would need to provide the CES before the GLA would assess the development at Stage 2.

### **Flood Risk Management and Drainage**

- 7.178 The proposal would provide new residential accommodation within an area designated by the Environment Agency as Flood Zone 3 – High Risk of flooding from fluvial (Beam Drain) and tidal (Thames and its tributaries) sources. However, it is noted that the north half of the site is shown on the Environment Agency's Flood Map for Planning as benefiting from flood defences. It is also noted that the latest approved hydraulic modelling from the adjacent Beam Park development indicates that the application site is not at risk from flooding for the 1 in 100 year plus 35% climate change storm event.
- 7.179 The same flood risk management principles would be applied for the application development as for the 90 New Road development. In order to appropriately manage the flood risk, no residential accommodation would be provided at ground floor level, and the ground level across the site would be raised to above 2.3m AOD – 300mm above the 1 in 100 year plus 70% climate change fluvial flood event. In order to reduce rain water run off rates to Greenfield level (calculated as 14.39 l/sec using the Greenfield Runoff Estimator Tool), hard landscaped areas would include permeable paving, soft landscaping would include rain gardens and attenuation tanks would be provided across the wider 90 New Road development.
- 7.180 The application site would be incorporated into the 90 New Road development's overall below ground drainage strategy. The underlying principle of the drainage strategy for the proposed development relies upon Sustainable Urban Drainage System (SUDS) measures that are integrated into the landscape design. A combination system of attenuation tanks, permeable paving, green roofs, and vegetated drainage channels will provide appropriate surface attenuation management across the proposed development that would deliver surface water runoff rates at Greenfield levels. Delivery of the SUDS measures would be secured by condition. The proposed drainage strategy, SUDS and associated infrastructure is considered to accord with London Plan 2021 Policies SI 5 (Water infrastructure) and SI 13 (Sustainable drainage).
- 7.181 In terms of the submitted Flood Risk Assessment, the Environment Agency have advised that they have no objections to the proposed development. The Council's Lead Local Flood Officer and Emergency Planning Officer have raised no objection to the proposal.
- 7.182 The details of the proposed development's flood risk management are considered to accord with London Plan Policy SI 12 (Flood risk management). The site drainage and water management proposals have been designed in

accordance with the London Plan and Havering guidance documents including the Strategic Flood Risk Assessment (SFRA), Havering SUDS Developer Guide (2015) and Havering Flood Risk Management Strategy (2017).

- 7.183 Thames Water have advised they have no objections or concerns with respect to waste and surface water drainage and management for the proposed development, but have request a Piling Method Statement to be secured by Condition due to proximity to sewerage infrastructure.

## **Fire Safety**

- 7.184 The application is supported by a Fire Engineering Technical Note, which advises the proposed development *'demonstrates a level of fire safety equal or greater than the general standard implied by compliance with the recommendations in BS 9991:2015. This level of safety therefore satisfies the functional requirements of Part B of the Building Regulations.'*
- 7.185 The London Fire Brigade has confirmed that the fire safety and fire vehicle access arrangement, that are proposed, meet their requirements.
- 7.186 In terms of fire safety the design proposals for the application development follow the principles set out in Approved Document B of the Building Regulations and have been developed in close collaboration with a Fire Safety Specialist. The application building is over 30m tall and therefore it requires and would be provided with sprinklers, as will all other buildings within the wider 90 New Road development. The application building together with all other buildings in the wider 90 New Road development will be clad in material that has been proven to have a limited combustibility.
- 7.187 Policy D12 (Fire Safety) of the London Plan 2021 requires that all major developments are supported by the submission of a detailed Fire Statement to ensure the development would meet the required level of fire safety. It should be noted that provision of a Fire Statement is a new requirement set out in the London Plan 2021, which was not in place when the application was submitted in July 2020. Therefore, it is considered appropriate to secure the Fire Statement by condition. It is noted that the applicant would need to provide the Fire Statement before the GLA would assess the development at Stage 2.

## **Health & Safety / Crime Prevention**

### Secure by Design

- 7.188 From a preventing crime design perspective, the proposal would present a layout that offers good natural surveillance to all public and private open space areas. The safe, secure design of the development and surrounding public realm is considered to accord with London Plan 2021 policies D3 (Optimising site capacity through the design-led approach, D4 (Delivering good design), D6 (Housing quality and standards), and D8 (Public realm), as well as Policy DC63

(Delivering Safer Places) of the Havering Development Control Policies 2008 on.

#### Aviation

- 7.189 A relevant condition would be applied in order to minimise the risk of bird strike by airplanes travelling over the site and to control the use of tall construction cranes.

#### Gas pipes / HSE

- 7.190 There are Cadent Gas, pipelines and Thames Water assets within relatively close proximity of the site; relevant Informatives would address this issue.

#### Contaminated land

- 7.191 Due to the previous industrial uses on part of the site, the land is likely to be contaminated. Suitable planning conditions would be required in order to ensure appropriate remediation of any land contamination at the site.

#### Summary

- 7.192 The proposed sustainability, energy efficiency, flood risk management, fire safety, security and crime prevention measures incorporated within the development proposal are considered to accord with London Plan 2021 Objective GG6 (Increasing efficiency and resilience) and Policy D11 (Safety, security and resilience to emergency).

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

- 7.193 The distances to neighbouring properties all far exceed recommended minimum separation distances, indicating that there would not be a material impact on the privacy of any occupiers of existing neighbouring residential properties. The layouts of the flats and the distances between the blocks within the development have been designed to maximise privacy and avoid overlooking issues. As such, the development is seen to accord with the requirements of Policy 7 (Residential design and amenity) of the Havering Local Plan Proposed Submission.
- 7.194 From a public protection perspective, the applicant has submitted a Noise Assessment, Contamination and Air Quality reports which confirm that both residents of the development and neighbouring residents would not be affected by unacceptable levels of noise or air pollution arising from the development. The Council's Public Protection Officers have reviewed the submitted reports and concluded that the scheme would be compliant with Policies DC52 (Air Quality) and DC55 (Noise) of the Havering Development Control Policies 2008, and Policy CP15 (Environmental Management) of the Havering Core Strategy 2008, subject to appropriate conditions. The development is considered to accord with London Plan 2021 Policies D13 (Agent of Change) and D14 (Noise).

## **Archaeology**

- 7.195 The site falls within a designated Archaeological Priority Area. In line with the requirements of London Plan 2021 Policy HC1 (Heritage conservation and growth) Part D, GLAAS have been consulted and have advised a condition is required to secure a Written Scheme of Investigation for archaeology and all works to be carried out in accordance with the approved scheme.

## **Skills, Training and Employment**

- 7.196 Policy E11 (Skills and opportunities for all) of the London Plan 2021 promotes supporting employment, skills development and apprenticeships. In line with the aims of this policy, together with the aims of the Havering Local Plan Proposed Submission Policy 22 (Skills and Training) Provision of a training and recruitment scheme for the local workforce during the construction period (linked to that already agreed for the 90 New Road development) shall be secured within a S106 legal agreement.

## **School & Health Care Provision**

- 7.197 The approved neighbouring development at Beam Park at is delivering a new school and new health care facilities. This will provide adequate provision to provide the required access to school place and health care for the future residents of the development.

## **Environmental Statement Assessment**

- 7.198 The 90 New Road development was assessed and found to be EIA development. Consequently, the earlier 90 New Road application was submitted with an Environmental Statement (ES) to demonstrate that the development would not result in any unacceptable environmental impacts. As the application development is proposed as an additional annexe to the development at 90 New Road, an ES addendum updating the 90 New Road ES has been submitted with this application. The ES addendum has been assessed and it is found that the addition of the proposed development at the application site would not result in any unacceptable environmental impacts, subject to the proposed appropriate mitigation measures as set out within the ES addendum.

## **S106 Contributions & CIL**

- 7.199 Policy DC72 of the Havering Development Control Policies 2008 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.

- 7.200 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 £32,501.19. This is necessary to provide a satisfactory setting for the proposed residential development, together with the required level of access to safe and inclusive active travel networks.
- 7.201 Policy DC32 of the Havering Development Control Policies 2008 seeks to ensure that development does not have an adverse impact on the functioning of the road network. Policy DC33 of the Havering Development Control Policies 2008 seeks satisfactory provision of off street parking for developments. Policy DC2 of the Havering Development Control Policies 2008 requires that parking permits be restricted in certain circumstances for occupiers of new residential developments. In this case, the arrival of a station and new residential development would likely impact on on-street parking pressure in existing residential streets off New Road. It would therefore be appropriate to introduce a CPZ in the streets off New Road. A contribution of £112 per unit (total £6,048) is sought, plus an obligation through the Greater London Council (General Powers) Act 1974 to prevent future occupants of the development from obtaining parking permits.
- 7.202 In summary, the following section 106 contributions are considered necessary to mitigate issues and make the proposed development acceptable:
- Sum of £32,501.19, or such other figure as is approved by the Council, towards provision of Linear Park in the vicinity of the site
  - Sum of £6,048, or such other figure as is approved by the Council, towards CPZ in streets north of New Road
  - Sum of £40,149 or such other figure as is approved by the Council, towards the Council's Carbon Offset Fund
  - Sum of £53,100 or such other figure as is approved by the Council, towards the Bus Mitigation Strategy
- 7.203 The developer will be liable to pay Community Infrastructure Levy (CIL) on commencement of the development. In this regard, the London Mayoral MCIL2 charging rate is £25/sqm for all development, and the Havering CIL (HCIL) for this part of Rainham is £55/sqm for residential development, £175/sqm for supermarkets (over 280sqm), and £50/sqm for all other retail.
- 7.204 Based on the information available at this stage, and subject to final checks, it is calculated that the development would be liable for £122,642.50 MCIL, and the HCIL liability has been calculated as £251,724 for the residential floorspace and £57,557.50 for the commercial floorspace, providing a total HCIL liability of £309,281.50. The HCIL liability has been calculated based on the provision of over 280sqm of flexible commercial space that could be used as a supermarket, therefore the HCIL liability for provision of a supermarket has been applied.

## **Housing Delivery Test**

- 7.205 On 19 January 2021 the Government published the 2020 Housing Delivery Test (HDT) results. The results show that within Havering 36% of the number of homes required were delivered over the three year period of 2017-18 to 2019-20. The NPPF (paragraph 11d) states that where the delivery of housing was substantially below (less than 75%) the housing requirement over the previous three years, the policies which are most important for determining the application are considered out of date. This means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. This is commonly referred to as the “tilted balance” in favour of sustainable development and is a significant relevant material consideration in the determination of the planning application.
- 7.206 The proposed development would contribute to boosting housing supply and delivery and this weighs in favour of the development. The assessment of the planning application has not identified significant harm nor conflict with development plan policies and where there is some harm/conflict identified it is considered that these do not outweigh the benefits of the proposal. It is therefore considered that in this case, the proposal does benefit from the presumption in favour of sustainable development set out in paragraph 11 d) of the NPPF

## **8. CONCLUSIONS**

- 8.1 All relevant policies and material considerations have been taken into account in the assessment of the development proposal. There is an officer recommendation that Planning permission should be granted subject to a S106 legal agreement and the conditions set out above within this report for the reasons set out above within this report. The details of the recommended decision are set out in the **RECOMMENDATION**.

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