



Haverling

LONDON BOROUGH

STRATEGIC PLANNING COMMITTEE AGENDA

7.00 pm	Thursday 26 February 2026	Council Chamber, Town Hall, Main Road, Romford RM1 3BD
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Members 6 Quorum 3

COUNCILLORS:

**Conservative Group
(2)**

Ray Best
Timothy Ryan

**Haverling Residents' Group
(3)**

Reg Whitney (Chairman)
Robby Misir (Vice-Chair)
John Crowder

**Labour Group
(1)**

Jane Keane

For information about the meeting please contact:

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**To register to speak at the meeting please call 01708 433100
before Tuesday 24 February 2026**

Please would all Members and officers attending ensure they sit in their allocated seats as this will enable correct identification of participants on the meeting webcast.

Under the Committee Procedure Rules within the Council's Constitution the Chairman of the meeting may exercise the powers conferred upon the Mayor in relation to the conduct of full Council meetings. As such, should any member of the public interrupt proceedings, the Chairman will warn the person concerned. If they continue to interrupt, the Chairman will order their removal from the meeting room and may adjourn the meeting while this takes place.

Excessive noise and talking should also be kept to a minimum whilst the meeting is in progress in order that the scheduled business may proceed as planned.

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:-

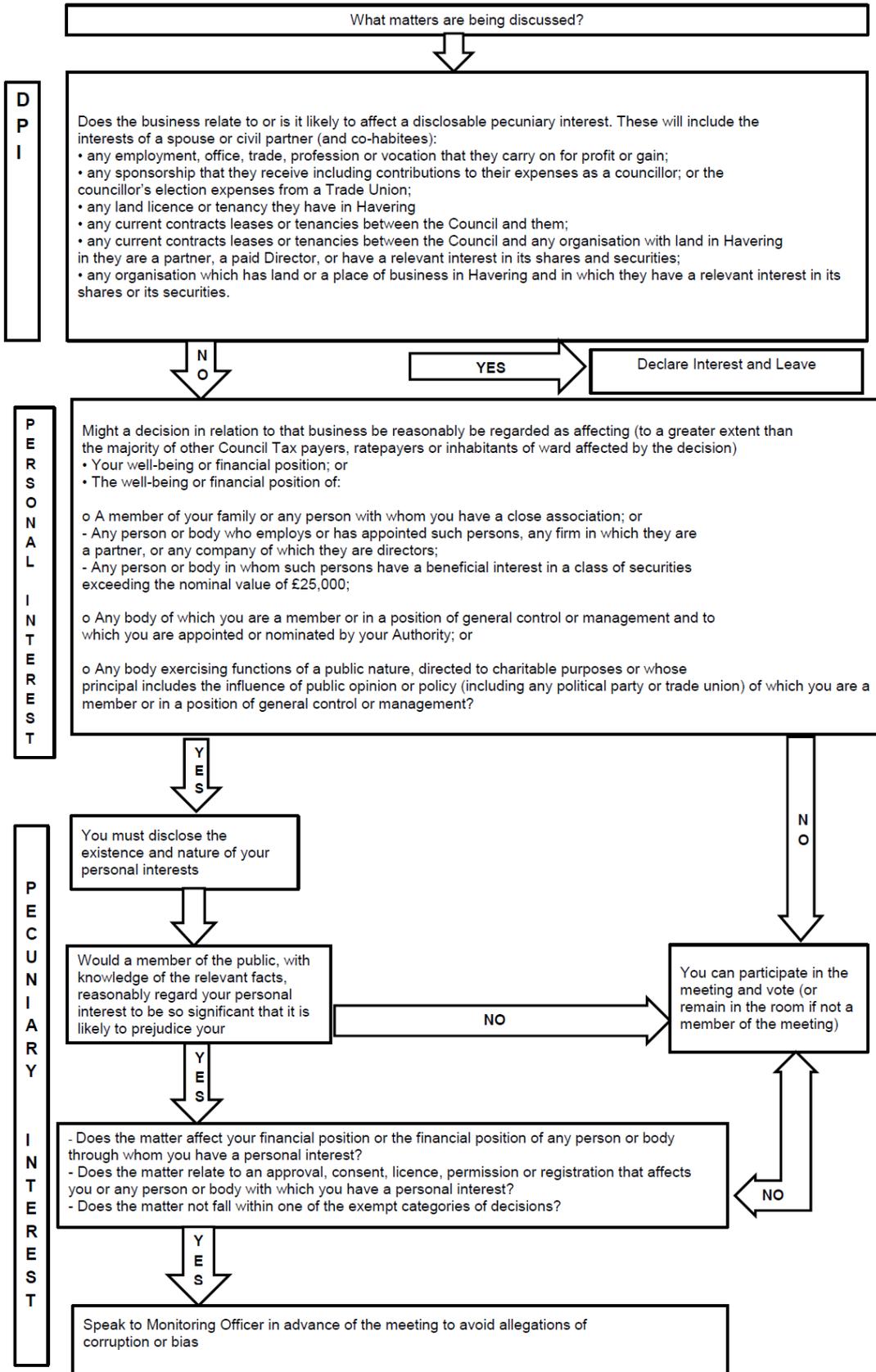
- filming, photographing or making an audio recording of the proceedings of the meeting;
- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing,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

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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.

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



Principles of conduct in public office

In accordance with the provisions of the Localism Act 2011, when acting in the capacity of a Member, they are committed to behaving in a manner that is consistent with the following principles to achieve best value for the Borough's residents and to maintain public confidence in the Council.

SELFLESSNESS: Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

INTEGRITY: Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

OBJECTIVITY: In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

ACCOUNTABILITY: Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

OPENNESS: Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

HONESTY: Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

LEADERSHIP: Holders of public office should promote and support these principles by leadership and example.

AGENDA ITEMS

1 CHAIR'S ANNOUNCEMENTS

The Chairman will make his announcements.

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.

2 APOLOGIES FOR ABSENCE AND ANNOUNCEMENT OF SUBSTITUTE MEMBERS

(if any) - receive.

3 DISCLOSURE OF INTERESTS

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

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

4 MINUTES (Pages 7 - 14)

To approve as a correct record, the minutes of the meeting of the Committee held on 22 January 2026 and to authorise the Chair to sign them.

5 DEVELOPMENT PRESENTATIONS (Pages 15 - 16)

Report Attached for noting.

6 W0198.25 - LAND NORTH OF BENETS ROAD, HORNCHURCH (CRANHAM /EMERSON PARK) (Pages 17 - 32)

Report attached.

7 APPLICATIONS FOR DECISION (Pages 33 - 36)

8 P1297.25 - LAND BOUND BY WATERLOO ROAD TO THE EAST, THE GREAT EASTERN MAINLINE LINE TO THE SOUTH, COTLEIGH ROAD TO THE WEST (Pages 37 - 64)

Report attached

9 P1293.25 - LAND BOUND BY WATERLOO ROAD TO THE EAST, THE GREAT EASTERN MAIN LINE TO THE SOUTH, COTLEIGH ROAD TO THE WEST (Pages 65 - 80)

Report attached.

**Zena Smith
Head of Committee and Election
Services**

**MINUTES OF A MEETING OF THE
STRATEGIC PLANNING COMMITTEE
Council Chamber, Town Hall, Main Road, Romford RM1 3BD
22 January 2026 (7.00 - 9.40 pm)**

Present:

COUNCILLORS

Conservative Group Ray Best and Timothy Ryan

Havering Residents' Group Reg Whitney (Chairman), Robby Misir (Vice-Chair) and John Crowder

Labour Group Jane Keane

Also present were Councillor Judith Holt, Councillor Matt Stanton and Councillor Viddy Persaud.

There were about 25 members of the public present for parts of the meeting.

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

10 DISCLOSURE OF INTERESTS

Councillor Tim Ryan declared an interest in the following matters before the Committee:

1. Crowlands Golf Centre, Rush Green
2. Former Debenham Store

11 MINUTES

Members agreed for the Chairman to sign the minutes of the meeting held on 11 December 2025.

12 W0154.25 - FORMER HOMEBASE, DAVIDSON WAY, ROMFORD

The Committee received a presentation on the proposed demolition of the existing building, followed by a residential-led redevelopment of the site, with some ground floor commercial and community spaces, and the creation of a primary school

The application site comprises a large brownfield site located just south of the Romford Ring Road (Oldchurch Road), east of Rom Valley Way, north of the Seedbed Centre site and west of the River Rom. Within the 1.9 hectare site is a large vacant retail store (formerly Homebase) with the

remainder of the site laid to hardstanding which used to function as Homebase's car park and external storage areas.

The proposed redevelopment seeks to provide 584 homes, approximately 200 sqm of commercial floorspace, a new public park and space set aside for a new primary school.

A Member queried flood risk mitigation, noting potential vulnerability at ground-floor level. Officers confirmed most of the site lay outside flood zones and that mitigation measures included minor level increases, bank naturalisation, and increased watercourse capacity, to be secured through conditions and the Flood Risk Assessment.

A Member asked whether the provision of a school formed part of the proposal. Officers confirmed no school was included in the application, but land was safeguarded for future provision through a Section 106 agreement.

Members raised concerns regarding parking provision, particularly disabled parking, and suggested this be increased if possible. Affordable housing was welcomed, though Members queried why only the minimum policy level was proposed and encouraged consideration of additional provision, including for key workers.

The Committee expressed concern about cumulative parking and traffic impacts arising from multiple developments coming forward concurrently. Members urged a coordinated approach with relevant bodies to ensure parking and transport arrangements were workable in practice.

Members welcomed increased public open space but raised concerns about limited connectivity to the town centre, station, and hospital, and the barrier effect of surrounding roads. Officers confirmed pedestrian routes were provided within the site and that contributions would support wider connectivity improvements, including future crossings.

Members raised concerns about graffiti, littering, and long-term management of the river corridor. It was suggested that improvements to areas along the river wall and Old Church Road be considered as part of the development works.

The Committee raised concern about the proposed height of up to 16 storeys which was considered to be at the upper limit of acceptability. Members requested further information on internal layouts and apartment sizes.

The following points were agreed as a summary of the Committee's views on the development:

1. The importance of fully addressing and mitigating flood risk was emphasised, with a request that all mitigation measures are clearly explained and fully set out in any future application.

2. Concerns were raised regarding the division and scale of the school, alongside wider discussion about parking provision, including whether sufficient and safe parking spaces are proposed. Members also highlighted the potential cumulative impacts of surrounding developments.
3. Consideration was requested as to whether the street design could accommodate informal or on street parking, as a means of alleviating potential parking pressures arising from the development.
4. The provision of affordable housing was welcomed, with a question raised as to whether there may be opportunities to increase affordable housing, particularly given the site's proximity to the hospital.
5. The increase in public park and open space provision was welcomed; however, questions were raised regarding the necessity and design of the proposed entrance feature, as well as concerns about the lack of connectivity, particularly along the river corridor and between the site and surrounding areas.
6. Members highlighted the importance of pedestrian connectivity, including strong links to the hospital, nearby community facilities and adjacent sites. There was also a request to explore opportunities for community involvement and stewardship of the river corridor, to help foster a sense of ownership and responsibility.
7. Concerns were raised about the height of the proposed development, with the view that it pushes policy boundaries and risks normalising taller building heights across the wider area, contrary to policy expectations of varied building heights.
8. While acknowledging that policy provides some flexibility on height, Members requested further detail on internal space standards, including floor plans, ceiling heights and levels of daylight.
9. Finally, attention was drawn to the area at the northern end of the river where the sewer emerges near the road, with a request to explore opportunities for environmental improvement and to clarify land ownership and responsibility for that area.

13 W0152.25 - CROWLANDS GOLF CENTRE, CROW LANE

Councillor Tim Ryan declared a Non Pecuniary Interest on this item. Councillor Ryan remained in the meeting and took part in the discussion. Councillor Ryan stated that he is a Ward Member and had made comment on the development recently.

The Committee received a presentation on the proposed full planning application for the mixed-use development of the site, including full details for a total of 1,253 affordable homes (100%), a 720 sqm sports hall, a 450 sqm community centre/boat house, 164 sqm of neighbourhood retail floorspace, together with associated landscaping, parking provision and cycle storage, the delivery of over 3.5 hectares of public open space and 1.5 hectares of children's play space, and the introduction of a new bus route linking Crow Lane and Wood Lane.

The Committee noted that the application site comprises the existing Crowlands Golf Centre, extending to approximately 22.5 hectares of land located to the south of Crow Lane and to the north of Wood Lane and Rush Green Road. The site spans two London boroughs, Barking and Dagenham and Havering, with the majority of the land situated within the London Borough of Havering. It is understood that the entire site is in the ownership of the London Borough of Barking and Dagenham. The site is designated as Metropolitan Green Belt in both the Havering and Barking and Dagenham Local Plans, and part of the site is also designated as a Site of Importance for Nature Conservation (SINC) of Borough Importance.

The report stated that the land is currently in use as a golf centre, comprising a 9-hole golf course, driving range, lake and clubhouse, and is arranged in an L-shape around the West Ham United training ground, which occupies a substantial area to the south and east. The site is bounded by school playing fields and existing residential development to the west, with a rugby club located to the north-east. In terms of accessibility, the site has a Public Transport Accessibility Level (PTAL) ranging from 1a (very low accessibility) in the north near Crow Lane to 3 (moderate accessibility) in the south near Rush Green Road. No part of the site lies within reasonable walking distance of a rail or Underground station, with Chadwell Heath and Romford stations both located more than 2 kilometres from the nearest point of the site. Public transport provision is limited, with Rush Green Road served by frequent bus routes, while Crow Lane is served only by the westbound 499 bus route, which operates at low frequency and has no bus stops along the site frontage.

With its agreement, a ward Member, Councillor Viddy Persaud addressed the Committee and raised objections to the proposal, stating that there was strong opposition from residents to development on the site which was described as Green Belt land and a valued open space. Councillor Persaud highlighted the importance of the area for community wellbeing, recreation, wildlife, and environmental benefits and warned that development would set a harmful precedent leading to the gradual loss of protected land. While acknowledging the need for housing, it was argued that Green Belt development should be a last resort particularly given the availability of nearby development sites and underused brownfield land. Concerns were also raised about pressure on local infrastructure including roads and health services and the potential environmental impacts. Councillor Persaud urged the Committee to reject the proposal and demonstrate that residents' views had been heard.

During general discussions, Members sought clarification on whether the site was designated Green Belt or Grey Belt. Officers advised that the site is designated as Green Belt in the adopted Local Plan. It was noted that recent changes to national planning policy have introduced the concept of Grey Belt, which requires a site by site assessment until a borough wide review is completed. Officers confirmed that a formal conclusion would be reached within the officer report, applying the relevant policy tests at the time of determination.

Members queried the historic landfill and ground conditions on the site. The Committee was advised that desk based assessments and borehole investigations had been undertaken, identifying historic inert construction waste in limited areas only. Further site wide investigations were ongoing, with no evidence of hazardous or toxic materials identified to date. It was confirmed that all findings would be submitted with the application and reviewed in consultation with the Environment Agency.

Members discussed the relevance of housing need to the proposal. Officers advised that housing need was a material consideration but would not, in itself, outweigh Green Belt policy. Concern was expressed that the proposed housing mix did not sufficiently address the need for larger family accommodation. It was confirmed that four bedroom units were included within the scheme and that full details of the accommodation schedule would be provided.

Members raised significant concerns regarding parking provision, traffic impact, and access arrangements, particularly given the scale of development and cumulative impact of nearby schemes. It was noted that car dependency remained high in the area. Concerns were also raised regarding pressure on local infrastructure, including roads, healthcare provision, and Queen's Hospital and Members requested that these matters be carefully assessed as part of the application.

Members raised concerns regarding the impact of the development on biodiversity and wildlife and requested further information on ecological assessments and proposed mitigation measures.

Members queried how the development would be managed given that the site spans two London boroughs. The Committee was informed that the site would be subject to a single estate wide management arrangement to ensure consistent maintenance, with statutory services delivered by the respective boroughs.

Members sought clarification on the definition of social rent and key worker housing. The Committee noted that rent levels would be agreed with the Council's housing department in accordance with London wide policy. Members also queried the proposed sports hall. The Committee was advised that discussions were ongoing with local sports organisations regarding its future management and community use.

The following points were agreed as a summary of the Committee's views on the development:

1. Members expressed the view that there needs to be clear direction on the future status of the site, including whether it should be considered Green Belt or Grey Belt.
2. Members emphasised the importance of confirming that the land is not contaminated, seeking further clarity on historic landfill use and whether this poses any ongoing or future risk.

3. Members noted comments regarding the provision of four bedroom dwellings and requested that the applicant clarify whether the proposed housing mix adequately meets identified local housing needs.
4. Members raised questions regarding the management of spaces between the buildings. It was noted that estate wide management would be in place, with borough responsibilities limited to statutory services such as refuse collection.
5. Concern was raised about the proximity of some buildings to the site boundaries and the potential impact on existing residents, particularly in relation to the overall scale and quantum of development.
6. Members queried whether the level of parking proposed would be sufficient to serve the number of future residents.
7. Members raised concerns regarding existing biodiversity on the site and requested reassurance that ecological impacts, including protected species, would be adequately addressed.
8. Concern was expressed regarding the capacity of existing infrastructure, particularly GP provision and the local hospital, to accommodate additional residents.
9. Members requested further consideration of vehicular access arrangements, including whether the proposed access points would function effectively and avoid congestion at peak times.
10. Members sought clarification on rent levels for social and affordable housing, as well as responsibility for the management and operation of the proposed sports centre and associated facilities.

14 W0214.25 - FORMER DEBENHAMS, 56-72 MARKET PLACE, ROMFORD, RM1 3ER

Councillor Tim Ryan declared a Non Pecuniary Interest on this item. Councillor Ryan remained in the meeting and took part in the discussion. Councillor Ryan stated that he recently started working with the a Councillor and that he also undertake consultancy work for the Member who was part of the Developer Team presenting this evening.

The Committee received a presentation on the proposed residential-led, mixed-use redevelopment of the former Debenhams site to provide a hotel (Class C1) with commercial space (Class E) at ground and upper floors fronting Market Place, alongside two residential buildings to the rear, connected by a communal amenity podium with commercial uses (Class E) at ground level, and a new public plaza with a freestanding commercial building (Class E), widening and landscaping works to Swan Walk.

The proposal would provide 155 homes within two towers positioned at the southern end of the site, which would be connected by a podium at lower levels, whilst the hotel at the northern end of the site would have 118 rooms.

The Committee was informed that two residential blocks at the southern end of the site are proposed at 12 and 14 storeys, with the taller of these two

buildings in the south-east corner. The hotel block facing Market Place would be of a similar height to the existing Debenhams building, at 6 storeys (noting that the existing building has very high floor-to-ceiling heights and the revised scheme incorporates more floors within the same broad envelope through reduced floor-to-ceiling heights).

A Member expressed concern that the proposal did not sufficiently reflect the Masterplan vision for the Market Square. In particular, concern was raised that the frontage appeared overly uniform and modern, lacking reference to the historic medieval market context or a civic presence. It was noted that the hotel entrance represented a missed opportunity for a more distinctive and characterful design. Further concern was raised regarding the scale and bulk of the two rear buildings, which were considered overly dominant. The Member felt that further design work was required to enhance the character of the Market Square.

A Member queried the level of disabled parking provision within the scheme. Officers confirmed that five Blue Badge spaces were proposed, equating to approximately 3 per cent of provision. The Member asked whether this could be increased slightly, noting the high level of activity within the Market Square, particularly on market days.

Members queried the absence of parking provision for hotel guests and sought clarification on policy requirements. Officers advised that there is no minimum parking standard for hotels under the London Plan. Given the highly accessible town centre location and proximity to public transport, parking provision should be limited to disabled, servicing, and operational needs only. Officers explained that additional guest parking would be contrary to sustainable transport objectives and would not be supported by the GLA.

Members noted concerns that hotel guests travelling by car could place additional pressure on existing town centre parking, particularly where public transport services are unreliable. Officers reiterated that the policy approach seeks to discourage private car use in town centre locations.

Members queried the lack of general parking provision, beyond disabled and operational spaces. Officers advised that, under the London Plan, this town centre site should limit parking to disabled, servicing, and operational needs only. There is no requirement to provide parking for hotel guests, and additional parking would conflict with sustainable transport objectives. Members noted the explanation.

Members expressed concern that the proposed design and materials lacked civic presence and sufficient reference to the historic town centre context. It was suggested that greater consideration be given to active ground-floor uses, signage, and a more distinctive or artistic treatment to enhance the streetscape.

Members noted that while hotel guest parking could be accommodated elsewhere, consideration should be given to drop-off and pick-up arrangements as part of the scheme's operation.

The following points were agreed as a summary of the Committee's views on the development:

- Concern that the proposals do not align with the approved masterplan and fail to adequately reflect the historic marketplace and its established character.
- The design was considered to lack a strong civic presence, with the hotel in particular missing an opportunity to contribute positively to a civic or landmark character.
- Concern regarding the height and massing of the development, particularly in relation to the rear buildings.
- Issues raised in respect of parking provision, including whether parking levels should be increased and the absence of dedicated hotel parking or a drop off facility.
- Comments were made regarding the hotel waiting and arrival areas, as well as the choice of materials, with a view that warmer and more cohesive materials could better enhance the overall design.
- Questions were raised as to whether the ground floor design should operate at a more human scale, reflecting the character of a historic town centre, including consideration of active frontages and a clearer shopfront strategy.

Chairman

Development Presentations

Introduction

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

Advice to Members

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

Public speaking and running order

6. The Council's Constitution only provides for public speaking rights for those applications being reported to Committee in the "Applications for Decision" parts of the agenda. Therefore, reports on this part of the agenda do not attract public speaking rights, save for Ward Members.
7. The items on this part of the agenda will run as follows:
 - a. Officer introduction of the main issues
 - b. Developer presentation (20 minutes)
 - c. Ward Councillor speaking slot (5 minutes)
 - d. Committee questions
 - e. Officer roundup

Late information

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

Recommendation

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

 <p>Havering LONDON BOROUGH</p>	<p>Strategic Planning Committee – Developer Presentation</p> <p>26 February 2026</p>
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Pre-Application Reference:	W0198.25
Location:	Land North of Benets Road, Hornchurch
Ward:	Cranham / Emerson Park
Description:	Residential-led development of up to 570 dwellings.
Case Officer:	Andrew Thornley

1. Background

1.1 This proposed development is being presented to enable Members of the committee to view it before a planning application is submitted and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional and subject to full consideration of any subsequent application and the comments received because of consultation, publicity and notification.

2. Proposal

2.1 The proposal relates to the development of the site, comprising approximately 570 homes and some ancillary non-residential floorspace. The developable areas would be concentrated across the central and western parts of the site, whilst the eastern half of the site would be used as areas of open space. This results in a scheme where approximately 12 of the 24.5 hectare site would be built on.

2.2 The scale of the proposed development includes buildings of heights increasing from two and a half storeys around the periphery of the site, up to four storeys in the centre, with intervening heights of three storeys, to gradually step up away from the site boundaries.

2.3 Access to the site is proposed from the north-west, via an extension to Rayburn Road and utilising part of the existing farm track which connects to it, and which would have to be widened and formally laid out to provide a usable access for the

proposed development. A secondary access is proposed in the south-east corner, from Benets Road.

2.4 The proposal is likely to come forward as an outline consent with all matters reserved.

3. Site and Surroundings

3.1 The approximately 24.5 hectare site comprises four fields in agricultural use to the north of Benets Road, to the east of Wingletye Road, to the south of Emerson Park Academy (a school) and to the west of Upminster Golf Club. The boundaries of the site are characterised by a single row of established deciduous trees, with more extensive copses in the north-west (within the application site) and south-east (mostly outside the application site), which are both protected by Tree Preservation Orders (TPOs).

3.2 There is an existing vehicular access to the site in the north-west corner from Rayburn Road, via a small track which runs through the woodland area, and three public footpaths (Footpaths 273, 284 and 285) which run along the boundaries of the site, with pedestrian accesses in all four corners.

3.3 The surrounding area (particularly to the south and west of the site) is of a suburban character, like most residential parts of the borough, and is characterised by rows of two-storey detached, semi-detached, and terraced houses with sloping roofs and relatively large rear gardens. There are some examples of bungalows, such as on Wingletye Lane, and flat-roofed houses, such as on the corner of Benets Road and Frimley Avenue. The areas to the north and east of the site are open and less developed, with a school and its playing fields and a golf course forming these respective boundaries, but overall the wider area appears as the edge of a traditional suburban town on the outskirts of London.

4. Relevant Planning History

4.1 Z0004.25 - Request for Screening Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in relation to an outline planning application for a residential-led development of up to 570 dwellings. EIA Not Required. Issued on the 11th September 2025.

4.2 This Screening Opinion was referred to the National Planning Casework Unit, working on behalf of the Secretary of State for the Ministry of Housing, Communities and Local Government, on the 22nd September 2025 by a third party, so that the council's decision could be reviewed, and for the SoS to issue their own Screening Direction.

4.3 The Planning Casework Unit issued their Screening Direction on the 16th January 2026, confirming that they agree with the LPA's position, and have concluded that the development is not EIA development.

5. Planning Policy Designations

- 5.1 The application site is subject to several planning designations, as set out in the Havering Local Plan.
- 5.2 Chief amongst these is the Green Belt, which the application site falls wholly within, which is a highly restrictive planning designation which seeks to protect the openness of the land around the edge of London, as set out by Policy G2 of the London Plan (London's Green Belt). The site is further classified as Grade 2 under the Agricultural Land Classification system, where Grade 1 (excellent) is the best and Grade 5 (very poor) is the worst.
- 5.3 In addition, the site falls within the Minerals Safeguarding Area, which seeks to protect the future supply of aggregates and prevent forms of development which would sterilise or prejudice future mineral extraction, in accordance with Policy 37 of the Havering Local Plan (Minerals Safeguarding).
- 5.4 The site is also designated as an Archaeological Priority Area (APA), with prehistoric potential, as set out in Policy 28 of the Havering Local Plan (Heritage Assets).
- 5.5 There are two small patches of land designated as being 'suitable for small wind energy developments' in the east of the site, as set out by Policy 36 of the Havering Local Plan (Low carbon design and renewable energy).
- 5.6 The Thames Chase Community Forest also covers the site, and largely overlays the Green Belt designation in this part of the borough. This is an aspirational designation which seeks to develop strategic woodland, habitats and access on a forest-wide scale.
- 5.7 Tree Preservation Orders (TPOs) cover the areas of woodland in the north-west and south-east corners, which are inside and (mostly) outside the site respectively. TPOs are used to designate trees of high amenity value to the public. These areas of woodland comprise a good mix of hawthorn (*Crataegus monogyna*), elder (*Sambucus nigra*), bramble (*Rubus fruticosus* agg.), holly (*Ilex aquifolium*), and holm oak (*Quercus ilex*), with a smaller number of other native species.
- 5.8 Ingrebourne River runs in a broad north/south direction to the west of the site, lying within the adjacent Upminster Golf Course, and subsequently some parts of the site, mostly in the south-east corner, are designated as Flood Zones 2 and 3. In addition, the Ingrebourne Valley Site of Importance for Nature Conservation (SINC) is also approximately 40-100 metres east of the site, which broadly follows the course of the Ingrebourne River but also extends to include some land adjacent to the river, largely on the eastern bank but also including a small section on the western bank approximately 90 metres south of the south-east corner.
- 5.9 The Hornchurch Cutting SSSI is located approximately 300 metres south-west of the site. This SSSI is an important Ice Age geological site, marking the maximum southerly extent of the northern ice sheet during the whole of the Ice Age in Britain. This railway cutting is also designated as the Railside Land SINC and wildlife

corridor, which is a linear feature which connects area of wildlife habitat acting to mitigate some of the adverse ecological effects of habitat fragmentation.

6. Quality Review Panel

6.1 The pre-application scheme was presented to Havering’s Quality Review Panel on the 13th January 2026. The feedback from the QRP, and the applicant team responses, are summarised in the table below:

QRP Comments	Applicant Team Response
Masterplan Principles	
<p>The character of the site should be informed by a detailed analysis of the local context (both the suburban morphology and landscape) - recognising how the surrounding area varies from street to street.</p>	<p>The character work to date will be expanded and developed further and will form part of the contextual analysis with the DAS.</p> <p>The DAS will also cover design principles and how the character analysis has influenced the proposed masterplan.</p>
<p>The relationship of the site within the wider setting of Hornchurch and Upminster should also be considered. This analysis should be used to inform the placemaking narrative that underpins the design approach.</p>	
<p>The panel does not expect the design team to replicate the surrounding streetscape which is characterised by granular layouts, deep setbacks and large gardens, and would significantly reduce densities.</p>	
<p>However, the team should seek to draw on the qualities of this context to establish a placemaking approach that informs the appropriate density and quantity of development for the site.</p>	
<p>The outline application should be supported by a more developed illustrative masterplan and a design code, which set clear parameters and guidance that should include, but not be limited to, character areas, street hierarchy, block typologies, servicing and parking.</p>	
<p>Defining the design code at this stage will provide a framework for the future developer to take forward and give council officers confidence that a high-quality scheme can be delivered.</p>	<p>The design code will seek to strike a balance between ensuring the delivery of a high quality scheme, without inhibiting innovation for future housebuilders.</p>

	Street hierarchy, as well as pedestrian and cycle movement will be covered by the design code.
Given the minimal variation in building heights, the distribution of density is likely to be less impactful than establishing a clear parking strategy and well designed street scene that will appropriately frame the buildings at any height.	The masterplan and code will align with policy in regard to parking provision. A variety of parking solutions will be implemented across the scheme to ensure this is sensitively delivered. Street design will be guided by landscape principles to create an attractive street scene which creates a setting to the built form.
The applicant is encouraged to look at Barking Riverside, Pudding Mill Lane and Old Ford masterplans, which are good precedents of high-quality design coded developments that have been delivered.	The suggested precedents will be studied by the project to team and we will look to draw from best practice.
Precedents such as LLDC Olympic Park developments, Northwest Cambridge and Accordia should also be considered. These schemes successfully deliver a suburban character with higher densities.	The outline code will feature illustrative visuals and sketches to summarise the proposed character and placemaking strategy.
Access and Servicing	
The applicant should demonstrate that the wider area can accommodate both the size of vehicles and uplift in trip generation associated with this development.	The accesses will be designed in accordance with the relevant design guidance and swept paths will be provided within the application to demonstrate that appropriate access can be provided. The access road is 6m wide and in excess of what need to be provided. Construction traffic would be subject to a construction traffic management plan and the size and timings of these movements can be managed.
There are concerns that local roads leading to the site - specifically the primary access on Rayburn Road - may struggle to adequately accommodate heavy goods vehicles (HGVs) and larger service vehicles, due to constrained mini-roundabouts and restricted turning radii.	This will be included within the Transport Assessment including capacity analysis of the junctions agreed with the Highway Authority during scoping.
The capacity of Rayburn Road, including the junction with Wingletye Lane,	

<p>should be considered in more detail. The introduction of approximately 570 homes would also have a major impact on the local road infrastructure which is already congested.</p>	
<p>The panel is concerned that the primary access road is too narrow for construction traffic and service vehicles to access the site and therefore questions whether the development is viable.</p>	<p>The existing width of Rayburn Road is 6m wide and therefore exceeds the 5.5m width required for two HGVs to pass. The width of this road has not been raised as a concern by the Highway Authority during our scoping discussions to date.</p>
<p>The secondary route is also restricted, which could cause significant issues with access to the site should the primary road be closed for any reason.</p>	<p>Notwithstanding the above, within the site the cross sections will be provided and a carriageway width of 6.2m could be secured in parameter form along the main travel corridor including a loop such that a bus service could be provided by TfL at a later date. There is a balance to be struck between placemaking and providing wider carriageways to accommodate a bus service/ vehicular movement.</p>
<p>Vehicle access may therefore need to be restricted by weight or axle width, and future bus access limited to a small hopper service, should TFL choose to introduce a route.</p>	<p>It is agreed that the closure of any primary access for a development would result in an undesirable access arrangement, however this is expected to be an incredibly rare occurrence, nor is it a reasonable design criteria.</p>
<p>As this is a new development it should be fully compliant with 'Manual for Streets' guidance.</p>	<p>Agreed, the scheme is being developed in accordance with relevant guidance including Manual for Streets.</p>
<p>A clear road hierarchy should be developed to define road widths, parking arrangements, swales and suds, and demonstrate how pedestrians, cyclists and vehicles will move around the site.</p>	<p>Agreed, a road hierarchy will be identified within the DAS and parameter plans which will demonstrate the movement strategy. This will focus on promoting active and sustainable travel in accordance with policy and best practice.</p>
<p>Segregated pedestrian and cycle routes, particularly on primary and secondary streets, should be defined within the design code.</p>	<p>The existing Public Rights of Way within the site will be retained and upgraded with new surfacing where appropriate.</p>
<p>The development should be planned within its wider context ensuring that existing footpaths linking to and crossing the site are retained and pedestrian</p>	

connectivity is supported.	
Road widths should be addressed as part of the parameter plans, as this will have an impact on the plot sizes and could result in taller buildings to deliver a viable scheme.	A carriageway width of 6.2m could be secured in parameter form along the main travel corridor.
The road layout has numerous dead ends and turning heads which could be designed out to create a more efficient, coherent and safer street network. Access and turning for refuse vehicles should also be reviewed, as the current road layout limits their ability to manoeuvre.	The internal arrangement is a reserved matter, however the indicative masterplan will be updated to minimise the turning heads within the site.
The panel recommends mapping pedestrian and cycle routes through the site to understand desire lines and connectivity.	The existing Public Rights of Way within the site will be retained and upgraded with new surfacing where appropriate.
Eliminating single-sided pavements is recommended, to reduce the need to cross multiple roads. This would improve child independence and safety.	The internal arrangement is a reserved matter, however the indicative masterplan will be updated to minimise the areas where footways are provided on one side of the carriageway.
The use of shared surfaces should be carefully considered, as these can be misused by parked vehicles and be difficult to manage.	The internal arrangement is a reserved matter, however the indicative masterplan will be updated to remove shared surfaces.
The parking strategy should be reconsidered, with a variety of typologies and provision. Including on-street spaces should be considered alongside on-plot, to provide a better quality of suburban street scene.	The internal arrangement is a reserved matter, however the DAS will provide details on parking provision and anticipated typologies. The level of parking provision is controlled through the minimum standard provided by the London Borough of Havering and the maximum standard set out within the London Plan, both of which need to be adhered to. On-street parking is likely to be utilised for visitor parking and to address potential overspill concerns.
Ecology	
The panel is concerned that ecological surveys will be undertaken after the outline application is submitted, meaning the scheme will not reflect their findings. The surveys should be used to inform and determine the design approach.	Further protected species surveys (<i>i.e.</i> Breeding bird surveys and ground level tree assessments) are recommended. Given the location of the site and habitats present, it is thought that any protected species, if present on site, can be easily mitigated for and certainly would not form a core population for any

	species in particular. The main concern would be the loss of arable land for nesting skylark, however this can be mitigated for with off-site plots, if required, as it would not be feasible to mitigate for them within the scheme.
A badger scoping survey should be completed before the application is submitted as it could have a significant impact on the masterplan. If a sett is identified, the scheme must be designed to accommodate it, to avoid applying for a licence for closure.	All areas of the site were accessed as part of the initial preliminary ecological appraisal and no badger signs or setts were observed. The site is disturbed through dog walkers and public utilising the site for walking and a commuting route. There are also well-established residential developments within the immediate vicinity causing a disturbance. A pre-commencement walkover for badgers will be undertaken prior to works, but a full suite of surveys are deemed disproportionate.
Other surveys, including a ground level tree assessment, breeding bird studies and a roosting bat survey should be carried out to assess the impact of construction and street lighting on wildlife.	Further breeding bird surveys are scheduled for 2026. Ground level tree assessments will be undertaken on any trees to be impacted. However if trees are to be retained, can be protected following the use of root protection areas and sensitive lighting this will mitigate impacts to bats.
The use of the existing vehicular access point as the primary access helps minimise the number of trees affected. However, the panel is concerned the carriageway width, pavements and lighting required will have a significant impact on natural assets within and outside the site boundary.	Agreed, further survey work will be required in relation to impacts on trees and bats once road width is confirmed.
More detailed work is required to demonstrate the width of road required and the impact on the existing woodland.	
There are also concerns about the isolation of the triangle of woodland to southeast of the site, and the disruption to existing wildlife corridors due to the new road.	Assuming this is meant to be the woodland to the north west where the new access road is coming in, there is already a gap between the woodland edges that forms a footpath, the addition of a road would not cause major fragmentation for wildlife and can be mitigated for. The existing trees are to be retained with new tree planting and greenspace also proposed to limit isolation. If it is in fact the south eastern

	woodland, there is connection to the east away from site that connects to the east to the golf course, with the line of trees to the east of the development site been retained with greenspace also proposed in this area to maintain wildlife corridors.
The panel requests further evidence to demonstrate the proposed flood remediation measures are adequate as the information provided does not offer sufficient reassurance.	The River is c.50m from the development site, and located within an existing golf course that is subject to disturbance. Furthermore there is an existing public footpath along the east of the site, between the development site and the River. Furthermore, the east of the site is to be used for public open space and not for residential development parcels, therefore not restricting wildlife access.
The existing network of ditches, swales and scrub provides ecological connectivity to the River Ingrebourne. However, the scheme will narrow the river corridor and restrict wildlife access to it. The applicant should therefore assess the impact of the development on wildlife movement across the site.	
The panel welcomes the retention of undeveloped land to the east of the hedgerow and acknowledges the potential of the landscape strategy. However, there are concerns that increased traffic and street lighting will negatively impact the site, and that the proposed open space does not sufficiently mitigate these effects.	A sensitive lighting strategy would be used throughout the site to mitigate any impacts on retained habitats.
Public Realm and Landscape Design	
The design appears to prioritise plot layout over landscape and ecology considerations; the panel would have expected a greater level of landscape detail at this stage if the scheme is intended to be landscape-led.	Additional plans will be included in the DAS to show how the scheme has been shaped by its landscape.
The panel welcomes the principle of a landscape-led approach but would like the applicant to demonstrate how the existing landscape, ecology and biodiversity character informs the design approach.	
More information is required on how urban greening and net biodiversity targets will be achieved as this is not clear.	This will form part of future pre-application discussions, and form part of the submission.
Each site edge condition requires further consideration to ensure a safe and secure environment is created. Single sided streets should be replaced	Due to the existing landscape structure of the Site (incl. PRow), it is not possible to arrange plots back to back

with gardens backing on to existing gardens where possible.	onto existing gardens. Edges will be illustrated in the Design Code.
Character zones should include differing garden sizes to provide variety and choice. This could also create a variety of plot dimensions.	This can be incorporated at the Design Core stage. It should be noted that the proposals presented to DRP were at the early stage of design and are subsequently being progressed in more detail to further consider character, density, patterning and street design.
New trees are welcomed but the proposal lacks granularity. Bushes, shrubs and other forms of planting should be indicated in the illustrative masterplan.	This will be illustratively shown on the Landscape Strategy plan, and developed further at the detailed design stage. The design code will also cover landscape design, street trees and open space types.
More evidence should be provided to support the number and size of play areas, as there are concerns that these seem insufficient for the number of family-sized homes.	The play standards will be reviewed again, and at the detailed design stage, the equipment would be chosen to accommodate a range of ages and abilities.
Provision for adult and older children's recreation should also be included in the landscape strategy to demonstrate the scheme has been thoughtfully designed for all age groups.	
'Day in the life' studies would help understand how different user groups will engage with the spaces.	

7. Key Planning Considerations

7.1 Principle of Development

7.2 The application site is designated as Green Belt, and put simply, the Green Belt is a very restrictive planning designation which seeks to protect land from development with its core principle related to the permanent protection of openness. Any harm to the Green Belt's openness should be given significant weight in the planning balance, with nearly all forms of development considered inappropriate. The applicant has brought forward these proposals on the basis that they consider the site to be grey belt.

7.3 In accordance with footnote 55 of the NPPF, if a site is designated as being 'Grey Belt', development of the land is not considered inappropriate by definition, and in such instances, very special circumstance are not required to justify development.

It should be noted, however, that to be considered as not inappropriate where a site is considered to be Grey Belt, in accordance with Para. 155 of the NPPF, the development must also not fundamentally undermine all five purposes (taken together) of the remaining areas of Green Belt within the borough, must demonstrate that there is an unmet need for the type of development proposed (for housing, this is a lack of a five year housing land supply), and must be in a sustainable location (through limiting the need to travel and offering a genuine choice of transport modes). The proposal must also meet the 'Golden Rules', as set out in the NPPF, which require that the policy target of affordable housing is provided on-site (in this case 50% by habitable room), necessary improvements to the local infrastructure are made, and new, publicly accessible green spaces are provided.

7.4 The proposal as stated above has been brought forward by the applicant on the basis that the site constitutes 'Grey Belt', which is defined in the NPPF as "*land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143*".

7.5 Para. 143 of the NPPF explains that the Green Belt serves five key purposes, namely:

- a) **to check the unrestricted sprawl of large built-up areas;**
- b) **to prevent neighbouring towns merging into one another;**
- c) to assist in safeguarding the countryside from encroachment;
- d) **to preserve the setting and special character of historic towns;** and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

7.6 Green Belt guidance has been provided in the form of the National Planning Policy Guidance (NPPG), which sets out how Grey Belt land should be identified, and this guidance requires a site to be assessed against each relevant purpose (a, b, and d as set out above) and to be assigned as a 'Strong', 'Moderate', or 'Weak' contributor against that purpose. Any assessment area that is judged to not strongly contribute to any one of purposes a, b, or d can be identified as grey belt land, and subject to also satisfying Para. 155 of the NPPF, can be considered an appropriate form of development.

7.7 With regards to the above, the Council along with other Councils, has been required to undertake its own Grey Belt Assessment, through LUC (a third party), which it is currently doing and this formal assessment will inform the council's long-term position on Green Belt and Grey Belt. Until this Green Belt / Grey Belt assessment has been published, each site must be assessed on its own merits on an individual site by site basis where a planning application has been received.

7.8 Havering's most recent Green Belt Study was carried out in 2016, and this study divided the borough's Green Belt into 24 parcels. The application site falls at the southern end of Parcel 13, which is described as making a "Paramount" contribution under purpose (a), a 'Major' contribution under purpose (b), and a "Fundamental" overall contribution to the Green Belt. The rationale being that

Parcel 13 provides separation between the northern part of Upminster at Cranham, and the eastern edge of Romford, at Emerson Park.

7.9 At this stage in the pre-application process, no formal determination as to the site's Green or Grey Belt status has been made by officers, however it has not been demonstrated to the council's satisfaction thus far that the site does not strongly contribute to both purposes (a) and (b) of the Green Belt's five purposes (with purpose (d) not being relevant to the site).

7.10 Moreover, the site has a PTAL of between 0 and 1b, indicative of very poor access to public transport, where there would be very heavy reliance on private vehicle trips for the day-to-day lives of future residents, and as such, the site cannot really be described as being in a sustainable location, taking into account paras. 110 and 115 of the NPPF, and relevant London Plan and Havering Local Plan policies relating to sustainable transport.

7.11 In terms of the Para. 155 assessment, it is agreed that there is an unmet need for new housing within the borough, with the lack of a demonstrable five-year housing supply, and on the basis of the information provided, it is likely that the proposal could satisfy the "Golden Rules", as set out under paras. 156 and 157 of the NPPF, if the site was to be assessed to constitute Grey Belt Land.

7.12 The application site is further designated as part of the Minerals Safeguarding Area, as described by Policy 37 of the Havering Local Plan (Mineral Reserves). This designation seeks to safeguard mineral reserves in Havering from other forms of development that would sterilise the resource and/or prejudice future mineral extraction.

7.13 Affordable Housing

7.14 The proposal is set to include 50% affordable housing (by habitable room), to meet the "golden rules" as set out in the NPPF. To meet this, the tenure of the affordable provision must be 70% social/affordable rent, 30% intermediate, in accordance with Local Plan policy.

7.15 Layout, Scale and Massing

7.16 The proposed layout, whilst shown indicatively (noting that the proposal would come forward as an outline consent), seeks to introduce development to the western parts of the site, safeguarding the eastern parts of the site as public open space. This is considered to be a sensible layout, which avoids developing the areas most at risk of flooding, and which is likely to better integrate with the surrounding built form.

7.17 Some concerns are raised with the proposed scale of the four-storey buildings within the centre of the development. Whilst it is recognised that there would be a need to optimise the site's potential, if the principle of development was supported, low-rise apartment blocks would not be particularly in keeping with the more suburban appearance of Emerson Park and Cranham, which are both characterised by one and two-storey houses. Having said that, given the size of

the application site, there may be scope to create a new neighbourhood with its own defining characteristics, which may allow for buildings up to four storeys, provided they relate well to other parts of the development.

7.18 As part of any future outline application, it would be expected that a detailed design code is submitted, which sets out the design principles to be adopted under the later reserved matters applications.

7.19 Access, Transport and Parking

7.20 The application site has a PTAL of between 0 and 1b, indicative of very poor access to public transport, where there would be very heavy reliance on private vehicle trips for future residents.

7.21 On this basis, it is expected that Havering Local Plan's minimum standards are met, and based on the results of a comprehensive Transport Assessment, a level of provision above the minimum standards may be necessary to serve future occupiers.

7.22 Vehicular access into the site would be from the north-west and south-east, utilising an existing farm track into the fields from Rayburn Road and a small unmade track between houses on Benets Roads.

7.23 Owing to the number of additional vehicles which would likely serve a development of this size, there is the potential for a significant increase in vehicle movements and potentially severe impacts on the local highway network. In this respect, Wingletye Lane already appears to experience relatively high levels of traffic at present and is single-carriageway in both directions, with limited scope to increase its capacity.

7.24 Ecology and Trees

7.25 The deciduous woodland within the site has the potential to provide high levels of biodiversity, and hence would be largely retained under the proposals, although it is noted that some tree loss would be required to facilitate the widening and laying of hardstanding across the farm track in the north-west corner to make it suitable for use by general vehicle traffic into the site. This could be offset by replacement tree planting, either around the existing areas of woodland or in other parts of the site (or both), and in any event, the mandatory Biodiversity Net Gain requirement would be applied to any future development which would, as a requirement, ensure that the proposal delivers improvements to existing biodiverse features and/or would involve the creation of new habitats.

7.26 The Ingrebourne Valley SINC is also approximately 40-100 metres east of the site, which broadly follows the course of the Ingrebourne River but also extends to include some land adjacent to the river, largely on the eastern bank but also including a small section on the western bank approximately 90 metres south of the south-east corner.

7.27 Owing to the proximity of the SINC, the priority habitat woodland and the greenfield nature of the site, it is considered that an Ecological Impact Assessment (EclA) would also be required at application stage, in addition to a PEA (Preliminary Ecological Appraisal).

7.28 The boundaries of the site are characterised by a single row of established deciduous trees, with more extensive copses in the north-west (within the application site) and south-east (mostly outside the application site) corners, which are both protected by Tree Preservation Orders (TPOs).

7.29 Any loss of trees protected by a TPO would have to be robustly justified, and it would be expected that any subsequent application is accompanied by an Arboricultural Impact Assessment.

7.30 Flood Risk

7.31 Ingrebourne River runs in a broad north/south direction to the west of the site, lying within the adjacent Upminster Golf Course, and subsequently some parts of the site, mostly in the south-east corner, are designated as Flood Zones 2 and 3. In this respect, it is recognised that approximately half of the overall site would remain undeveloped, with approximately 12 hectares reserved for green infrastructure, whilst also stating that the areas of the site in Flood Zones 2 and 3 would not be developed.

7.32 Nonetheless, noting that the application site includes flood zones 2 and 3, and would be significantly above the size threshold, a Flood Risk Assessment (FRA) would be required alongside any future application, and the Environment Agency would be consulted to review this FRA.

7.33 A SUDs Strategy would also be required, and should be designed and implemented in a manner which promotes multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation, which should further support enhancements, where possible, to the Ingrebourne River.

8. Conclusions

8.1 The main consideration of this application will be whether the site constitutes 'Grey Belt', in accordance with the latest planning guidance. At this stage in the pre-application process, the local planning authority is considering the details of the submission and will formally set out a recommended position if an application is subsequently submitted for this site.

8.2 Notwithstanding the Grey Belt considerations, some concerns are raised in respect of the proposed accesses into the site, and the potential transport impacts this may have on the local highway network, which would need to be robustly justified as part of any future planning application.

8.3 The proposed development is still at pre-application stage. The scheme will be further progressed through a design led approach. At this stage we would welcome

Members thoughts and comments on the proposals to be incorporated in the scheme ahead of a potential future submission.

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Applications for Decision

Introduction

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

Advice to Members

Material planning considerations

4. The Committee is required to consider planning applications against the development plan and other material planning considerations.
5. The development plan for Havering comprises the following documents:
 - London Plan Adopted March 2021
 - Havering Local Plan 2016 – 2031(2021)
 - Site Specific Allocations (2008)
 - Site Specific Allocations in the 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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 Havering LONDON BOROUGH	Strategic Planning Committee 26 February 2026
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Application Reference: P1297.25

Location: Land bound by Waterloo Road to the east; the Great Eastern Main line to the South, Cotleigh Road to the west

Ward St Edwards

Description: S73 Variation of conditions 5 (approved plans) and 9 (building footprints & heights) of planning permission ref: P0761.20 dated 12/11/2021 (Hybrid (part outline, part detail) planning application for the phased redevelopment of the site comprising demolition and the provision of 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)

Case Officer: Malachy McGovern

Reason for Report to Committee:

- The application is within the categories which must be referred to the Mayor of London under the Town and Country Planning (Mayor of London) Order.
- The application is by or on behalf of the Council and is a significant development.

1 BACKGROUND

- 1.1 The application has been prepared by Avison Young ('AY') on behalf of Havering and Wates Regeneration LLP ('the Applicant') to accompany a planning application to vary the wording of Conditions 5 and 9 of planning permission ref. P0761.20 (the 'Original Consent'), submitted pursuant to S.73 of the Town and Country Planning Act 1990.
- 1.2 The submitted application seeks approval to amend the approved parameter plans under Condition 5 and 'dashed line' plans as detailed in Condition 9 of the Original Consent. The proposals are being brought forward alongside a Reserved Matters Application (RMA) ref. P1293.25 for plots 9 and 10 which is also on the SPC agenda for 26th February 2026. This Section 73 application seeks to amend the relevant parameter plans within the outline element of the hybrid consent, while the RMA will deliver the detailed design for these plots. The applications were submitted together to enable a coordinated assessment and ensure that the revised parameter plans directly align with the proposed detailed scheme.
- 1.3 The purpose of the proposed amendments under this S73 application seek to enhance the deliverability and efficiency of Blocks 9 and 10. The revised parameter plans allow a Reserved Matters scheme to be delivered that reduces overall building massing, simplifies building forms, and rationalises the core strategy, ensuring compliance with updated building regulations and removing the need for dual-core arrangements. These changes also improve separation distances, optimise building footprints, and provide a more efficient layout that supports construction and long-term management. The amendments are modest in scale and will not result in any adverse impacts on the wider masterplan context or surrounding views.
- 1.4 The GLA have been consulted and have advised that the proposed amendments have been assessed and, given their scale and nature, do not raise any new strategic planning issues. Accordingly, the Mayor of London does not need to be consulted further under Article 5(2) of the Order, and the Council may proceed to determine the application without further reference to the GLA, noting that TfL may provide separate comments as part of its statutory consultation response.

2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 2.1 The proposed Section 73 application seeks to vary Conditions 5 and 9 of planning permission ref. P0761.20 to amend the approved parameter plans for Plots 9 and 10. The amendments are modest, relate solely to approved conditions, and do not alter the description of development or the established principle of the scheme. They are intended to improve deliverability in response to updated building regulations and result in reduced building heights, simplified massing, and improved separation distances. These changes deliver clear

public benefits by facilitating the timely delivery of much-needed housing, including a significant proportion of affordable homes, on a sustainable, brownfield site in accordance with the objectives of the London Plan and the Havering Local Plan.

- 2.2 The revised parameters have been subject to detailed assessment and are not considered to give rise to any new or unacceptable impacts in terms of residential amenity, heritage, townscape, transport, or environmental effects. On the contrary, the reduced scale and improved layout result in neutral or beneficial outcomes when compared to the approved scheme, including improvements to daylight, sunlight, outlook, privacy, and public realm. In the planning balance, substantial weight is afforded to the delivery of housing and affordable housing, improved scheme viability, and enhanced design outcomes. Any minor changes arising from the amendments are clearly outweighed by these benefits. The proposal is therefore in accordance with the development plan and there are no material considerations that indicate planning permission should be refused.

3 RECOMMENDATION

- 3.1 That the Committee resolve that planning permission be granted under Section 73 of the Town and Country Planning Act 1990 (as amended) to vary Conditions 5 and 9 of planning permission ref. P0761.20, to allow amendments to the approved parameter plans and associated plan references in relation to Plots 9 and 10, subject to:

- The conditions set out in this report, including updated conditions and plan references, and the re-imposition of all other relevant conditions attached to the original permission except where expressly superseded; and
- The prior completion of a Deed of Variation under Sections 106 and 106A of the Town and Country Planning Act 1990 (as amended) and all other enabling powers to link this permission to the existing Section 106 Agreement dated 12/11/2021:

- 3.2 The Mayor of London has confirmed that although a referable application they do not wish the application to be referred to them at Stage 2. That the Director of Planning and Public Protection is delegated authority to issue the planning permission subject to a deed of variation to the original Section 106 obligation and the following planning conditions:

Conditions:

1. Time Limit (Outline)
2. Reserved Matters Submission
3. Reserved Matters Time Limit
4. Approved Plans
5. Parameter Plan Compliance
6. Phasing Plan
7. Pre-Commencement Conditions by Phase
8. Revised Design Code
9. Design Code Compliance
10. Maximum Building Envelopes
11. Maximum Dwelling Numbers
12. Site Levels and Floor Levels
13. Materials Details
14. External Appearance Details
15. Shopfronts and Ground Floor Frontages
16. Construction Access Strategy
17. Pedestrian and Cycle Connections
18. Highways Works Details
19. Servicing and Delivery Strategy
20. Construction Environmental Management Plan
21. Demolition Environmental Management Plan
22. Air Quality and Dust Management Plan
23. Noise and Vibration Control (Construction)
24. Piling and Ground Vibration Control

25. Archaeological Written Scheme of Investigation
26. Archaeological Foundation Design
27. Heritage Interpretation Scheme
28. Contaminated Land Investigation
29. Contaminated Land Remediation
30. Unexpected Contamination
31. Soil and Materials Management
32. Circular Economy Statement (Outline)
33. Circular Economy Statement (Reserved Matters)
34. Post-Completion Circular Economy Report
35. Recycling and Waste Reporting
36. Refuse and Recycling Storage
37. Bulky Waste Strategy
38. Energy Strategy – Residential
39. Energy Strategy – Non-Residential
40. Carbon Offset Contribution
41. Ultra-Low NOx Boilers
42. Air Quality Neutral Assessment
43. Mechanical Ventilation for Commercial Uses
44. Odour Control – Commercial Uses
45. Plant and Machinery Noise Control
46. Commercial Noise Rating Levels
47. Internal Residential Noise Standards
48. Sound Insulation Between Uses
49. Glazing and Ventilation (Road and Rail Noise)

50. Secured by Design Accreditation
51. Fire Statement
52. Fire Appliance Access
53. Evacuation Lifts
54. Sprinkler Systems
55. Inclusive Access – M4(2)
56. Wheelchair Housing – M4(3)
57. Communal Amenity Space
58. Children’s Play Space
59. Landscaping Strategy
60. Landscape Implementation
61. Landscape Maintenance
62. Urban Greening Factor
63. Biodiversity Enhancements
64. Bird Hazard Management Plan
65. Public Realm Details
66. Lighting Strategy
67. Boundary Treatments
68. Privacy and Overlooking Control
69. Podium Landscape Access
70. Balcony Design and Privacy
71. Roof Plant Screening
72. Telecommunications Restriction
73. Removal of Permitted Development Rights (Dwellings)
74. Cycle Parking Provision

75. Cycle Parking Details
76. Car Parking Provision
77. Car Club Provision
78. Electric Vehicle Charging
79. Travel Plan (Residential)
80. Travel Plan (Non-Residential)
81. Travel Plan Monitoring
82. Delivery and Servicing Management Plan
83. Street Naming and Numbering
84. Flood Risk and Drainage Strategy
85. Surface Water Management
86. Sustainable Drainage Implementation
87. Maintenance of Drainage Systems
88. Highway Surface Water Restriction
89. Public House Floorspace Retention
90. Commercial Use Restrictions
91. Phased Occupation Restrictions
92. Partial Discharge Compliance Statement
93. Post-Occupation Monitoring and Compliance

Informatives

CIL, Highways works, reason for granting permission, new house numbering

4. Site and Surroundings

- 4.1 The application site comprises Plots 9 and 10 within the wider Waterloo and Queen Street regeneration area. The plots are located to the south-western portion of the outline site, bounded by Queen Street and Cotleigh Road, and

in proximity to St Andrew's Church and the adjoining railway corridor. The wider outline 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. The site falls within the Romford Strategic Development Area (SDA). Romford town centre lies immediately east of the site.

- 4.2 The existing site previously comprised of 290 residential homes but has since been cleared of all structures with a hardcore surface.
- 4.3 There are 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.
- 4.4 The site does not fall within a conservation area and there are no listed buildings on site. However there are 3 Grade II listed buildings adjacent to or near the site (St Andrews Church, Salem Baptist Chapel and the Sun Public House) located at the western and northern edges of the applications site. The Romford Town Centre Conservation Area is also located to the east.
- 4.5 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).
- 4.6 The site also falls within an Air Quality Management Area (AQMA) and the Romford Strategic Development Area.

5.0 Proposed development

- 5.1 The application seeks planning permission under Section 73 of the Town and Country Planning Act 1990 to vary Conditions 5 (Approved Plans) and 9 (Parameter Plans) of planning permission ref. P0761.20 in order to amend the approved development parameters for Plots 9 and 10 of the Waterloo Estate masterplan. The proposed changes comprise modest revisions to building footprints, heights and layout, including a reduction in maximum building heights, consolidation and simplification of massing, rationalisation of core arrangements, and minor realignment of buildings within the approved plot envelopes. The amendments are intended to improve deliverability and compliance with updated building regulations while maintaining the approved land use, housing quantum, and overall design principles of the consented scheme. The amendments can be summarised as follows:

- Reduction in overall building heights across both plots:
 - Plot 9: Maximum height reduced from 8 storeys to 6 storeys.
 - Plot 10: Uniform height of 4 storeys introduced, replacing stepped 4–5 storey massing.

- Refined parameter dimensions:
 - Overall building lengths and widths updated to reflect consolidated massing.
 - Plot 9: 41.5m and 55.1m length blocks (previously split 41m + 59m).
 - Plot 10: Increased maximum length (now 74m) and more consistent form, previously 69.5m

- Reduction in total building mass and footprint complexity:
 - Consolidation of multiple smaller blocks into a single, more coherent building on each plot.
 - Simplified building forms supporting more efficient delivery.

- Rationalisation of core strategy:
 - No buildings now exceed 18m in height, avoiding "high-risk" classification.
 - Removal of dual-core buildings, reflecting updated building layouts.

- Improved closest separation distances to site boundaries and surrounding development:
 - Plot 9: Northern boundary increased to 7.75m (previously 5m).
 - Plot 10: Minimum southern boundary increased to 6.3m (previously 5.8m).

- Improved contextual response:
 - Setbacks adjusted to better respect proximity to St Andrew's Church and Cotleigh Road.
 - Enhanced public realm interfaces and daylight/sunlight conditions.

- Minor repositioning within plot boundaries:
 - Realignment of building footprints within approved plot envelopes for design optimisation.

6. Planning History

6.1 The Original Planning Permission (ref: P0761.20)

- 6.2 The hybrid planning permission (Ref. P0761.20) (the *Original Consent*) was granted on 12 November 2021 for the comprehensive redevelopment of the site. The description of the approved development is as follows:

“Hybrid (part outline, part detail) planning application for the phased redevelopment of the site comprising demolition and the provision of up to 1,380 (Use Class C3) residential units (40% affordable), built over 3–16 storeys, flexible commercial floorspace (Use Classes A1–A4, B1, D1/D2), community floorspace, open space and associated public realm improvements, parking, play space, highways improvements and a central cycle route. Outline with all matters reserved (except access) and Detailed Full Planning for Phase 1.”

- 6.3 The Original Application was subject to an Environmental Impact Assessment. The approved development comprised five phases, with the detailed element including Block 1 and Block 2. The scheme has been implemented; however, in 2023 construction on site was paused following amendments to national regulations, including the requirement for second stair cores within residential developments above a specified height threshold, which rendered the approved scheme unviable in its consented form.
- 6.4 The Original Consent has subsequently been varied and supplemented through a series of applications, as outlined below.

6.5 Amendments to the Original Consent

- 6.6 A non-material amendment (ref: N0075.22) to application Ref. P0761.20 was approved on 6 September 2023 to permit changes including floor-to-floor height reductions, alterations to colonnades, and revisions at ground level.
- 6.7 A non-material amendment (ref: N0025.23) to application Ref. P0761.20 was approved on 9 June 2023 to revise the wording of Condition 7 (Phasing Plans) to incorporate Community Infrastructure Levy (CIL) phasing plans.
- 6.8 Discharge of Condition (ref: Q0194.24) was approved on 7 November 2024 for the re-discharge of Condition 7 (Phasing) to include an updated phasing plan incorporating a new Phase 1C, which includes part of the originally consented Village Green.
- 6.9 Non-material amendment (ref: N0059.24) was approved on 14 February 2025 to amend the trigger of Condition 8 of the Original Consent (Ref. P0761.20) to align with the amended phasing strategy and the introduction of Phase 1C. As the proposal only sought to bring forward a limited part of the Village Garden, the amendment allowed for the updated Design Code to be submitted *prior to the submission of the second Reserved Matters application*, enabling it to be brought forward at a later, more appropriate stage.
- 6.10 Approval of RM (ref: P1392.24) was approved on 20 March 2025 for the *Approval of Reserved Matters (appearance, landscaping, layout and scale)* pursuant to outline permission P0761.20, in association with part of the Village

Garden. The series of applications outlined above were submitted to support the ongoing deliverability of the parent permission and to provide the necessary flexibility for effective implementation.

- 6.11 An application (ref: Q0107.25) was submitted on 2 June 2025 to discharge Condition 8 (Design Code) in relation to the forthcoming Reserved Matters Application for Plots 9 and 10 at the Waterloo Estate. The submitted Addendum ensures that forthcoming Reserved Matters applications and future phases of the masterplan are underpinned by an up-to-date design framework that aligns with the principles of the Original Consent while responding to evolving policy and technical requirements.

6.12 Other Relevant Applications

- 6.13 Temporary planning permission (ref: P0108.25) was approved on 30 May 2025 for the redevelopment of Plot 5 of the Waterloo Estate masterplan to deliver modular housing units (Use Class C3) as a meanwhile use, alongside new landscaping, cycle facilities, and associated works.
- 6.14 Temporary planning permission (ref: P1421.24) was approved on 16 May 2025 for the change of use of land to provide a car park, cabin (Use Class F1(f) – Learning and Non-Residential Institutions), toilet block, and associated plant. This permission has not yet been implemented.

7.0 LOCAL REPRESENTATIONS

- 7.1 443 letters of notifications were sent to the adjoining occupiers on the 8th October 2025. 15 comments were received including 2 objections.

The objections can be summarised as follows:

Issue 1: Potential loss of daylight and sunlight due to the physical impact of the buildings which are up to 16 storeys. Additional potential overlooking into private garden

Officer Response: The reference to 16 storeys relates to the wider site and not the buildings on plot 9 and 10 which are limited to 6 storeys. The impacts of the development in relation to residential amenity were assessed in detail at the outline stage and through subsequent reserved matters approvals, supported by daylight and sunlight assessments undertaken in accordance with recognised BRE guidance. The current Section 73 application does not increase the approved building heights and, in parts, proposes reduced heights and simplified massing, which result in neutral or improved amenity outcomes when compared to the consented scheme. Separation distances and window placements have been designed to minimise overlooking, and conditions are in place to secure appropriate design measures. The proposal is therefore not considered to result in unacceptable harm to neighbouring residential amenity.

Issue 2: Social, environmental, public health and fire safety reasons. Strain placed on already overstretched local infrastructure

Officer Response: The development has been revised specifically to respond to updated fire safety regulations, with fire safety matters fully assessed and secured through approved Fire Statements and compliance with the Building Regulations regime. The principle, scale and infrastructure impacts of the scheme were established through the extant permission, which was subject to Environmental Impact Assessment, and appropriate mitigation and financial contributions were secured through planning conditions and the Section 106 agreement. The current Section 73 application does not increase the quantum of development or place additional pressure on local infrastructure beyond that already accepted. On balance, the social impacts of the scheme are considered positive, delivering much-needed housing, including affordable homes, alongside new public amenity space and environmental improvements.

Internal and External Consultation:

7.2 Internal Consultees

LBH Environmental Health (Noise & contamination) - No response
LBH Environmental Health (Air quality) - No objection
LBH Highways - No response
LBH Waste & Recycling - No objection
Place Services (Ecology) - No objections subject to conditions
LBH Local Lead Flood Officer – No objection

7.3 External Consultees

Anglican Water Authority – No objection

Thames Water – No objection

Essex & Suffolk Water – No objection

UKPN – No objection

London Fire – No objection

Transport for London – No response

Historic England – No objection

Environment Agency – No objection

Metropolitan Police – No objection subject to conditions

Greater London Authority (GLA) – No new strategic planning issues raised. No further consultation with Mayor required

8 MATERIAL PLANNING CONSIDERATIONS

8.1 The main issues for consideration for this application are:

- The principle of development
- Housing supply and mix
- Scale, height, bulk and design
- Built heritage
- Quality of the proposed accommodation
- Impact on Neighbouring Amenity
- Transport and Highways
- Environment Issues
- Sustainability
- Flooding and Drainage
- Ecology
- Energy Efficiency
- Community Infrastructure Levy / s106
- Equalities

9.0 Principle of development

9.1 The principle of comprehensive residential-led redevelopment of the site has already been established through the extant planning permission (ref. P0761.20), which was granted following detailed assessment and is therefore a material consideration of significant weight in the determination of this Section 73 application. As this application seeks only to vary approved conditions, the acceptability of the development in land use and quantum terms is not reconsidered. The focus of the assessment is whether the proposed amendments would result in any material change to the planning impacts previously found acceptable.

9.2 The proposed amendments arise primarily from the need to respond to updated building regulations and technical delivery requirements, including the rationalisation of massing and core arrangements. Officers have carefully considered whether these changes materially alter the form, scale or nature of the approved development and are satisfied that they are limited in scope, do not increase the approved quantum of development, and do not undermine the established planning principles of the Original Consent. On this basis, the amendments are considered acceptable in principle.

9.3 The Original Consent approved a predominantly residential-led masterplan comprising up to 1,380 dwellings, with detailed approval for Phase 1 and outline approval for subsequent phases. The proposed Section 73 amendments do not alter the approved land use mix or the amount of residential floorspace

consented. Importantly, the affordable housing commitments secured through the Original Consent remain unchanged and continue to be delivered in accordance with the agreed tenure mix and phasing arrangements.

- 9.4 In assessing the application, officers have had regard to the Council's current housing position, including the outcome of the Housing Delivery Test and the borough's limited housing land supply. While the application does not propose any increase in housing numbers or affordable housing provision beyond that already approved, the delivery of 100% affordable housing within this phase is a material benefit and carries significant weight in the planning balance, particularly given the acute local and strategic need for new homes and in particular affordable homes. The proposed amendments are considered necessary to enable the effective delivery of this phase and to ensure that the affordable housing already consented can be brought forward without delay.
- 9.5 Overall, officers are satisfied that the proposed amendments do not compromise the land use strategy or affordable housing objectives of the Original Consent and that the development continues to accord with the strategic objectives of the London Plan, the Havering Local Plan, and national planning policy in respect of housing delivery. The principle of development therefore remains acceptable.

10.0 Housing supply and mix;

- 10.1 The proposed Section 73 amendments do not alter the approved land use mix, housing quantum or housing mix secured through the Original Consent, which established a predominantly residential-led masterplan of up to 1,380 dwellings. The amount of residential floorspace, the approved tenure profile, and the overall affordable housing provision remain unchanged. As such, the application does not give rise to any adverse implications for housing supply or housing mix when assessed against the development plan. The proposal continues to comply with the strategic housing objectives of the London Plan and the Havering Local Plan, which seek to maximise the delivery of new homes, including affordable housing, on suitable and accessible sites.
- 10.2 Notwithstanding that no uplift in housing numbers is proposed, the delivery of this phase—comprising 100% affordable housing—is a material consideration of significant weight, particularly in the context of the borough's constrained housing land supply and identified housing need. The Council is currently unable to demonstrate a five-year housing land supply, and the delivery of affordable housing through Plots 9 and 10 will make a meaningful contribution towards meeting local need, including addressing housing waiting lists. Officers are satisfied that the proposed amendments to the approved parameter plans are necessary to enable the effective delivery of the consented affordable housing and therefore support, rather than undermine, housing supply objectives. In this context, the proposals are considered to have a positive impact on housing delivery and carry substantial weight in the planning balance.

11. Layout, scale, bulk and Design assessment

- 11.1 The design principles for Plots 9 and 10 were established through the Original Consent, including the approved parameter plans, Design Code and Outline Design and Access Statement, which responded to the site's sensitive context, its gateway role within the masterplan, and its relationship with the Grade II listed St Andrew's Church and surrounding residential areas. These documents remain material considerations of significant weight. The current Section 73 application has therefore been assessed on the basis of whether the proposed amendments would result in any material harm to the approved design framework, townscape character or heritage setting.
- 11.2 The proposed amendments retain the overarching design intent of the consented scheme but introduce targeted refinements to layout, footprint and massing to respond to updated Building Regulations and improve buildability. Officers are satisfied that the revisions do not result in a harmful increase in scale or bulk when compared with the approved scheme and, in some respects, represent an improvement. Overall building heights have been reduced, with a maximum of six storeys on Plot 9 and a consistent four-storey height on Plot 10, and massing consolidated into single, coherent blocks. These changes improve legibility, reduce visual complexity, and provide increased separation distances to neighbouring properties along Cotleigh Road.
- 11.3 In policy terms, the proposals have been assessed against the design-led approach set out in Chapter 11 of the NPPF, London Plan Objective GG1, London Plan Policy D3, and Local Plan Policy 26. Officers are satisfied that the revised scheme continues to make effective use of a sustainable brownfield site, optimises site capacity through a design-led approach, and responds appropriately to its context. The reduction and reconfiguration of massing, alongside refined façade alignment and step-backs, ensures a sensitive relationship with the setting of St Andrew's Church and avoids the introduction of visually dominant or incongruous elements within the local townscape.
- 11.4 The rationalisation of building cores and refinement of footprints have also enabled improvements to internal layouts, including an increased proportion of dual-aspect dwellings and enhanced daylight and sunlight penetration, without compromising the external form or architectural quality of the development. Public realm interfaces have been strengthened through improved landscaping, particularly along the churchyard edge and key pedestrian routes, contributing positively to placemaking and the quality of the environment for both future residents and the wider community.
- 11.5 Overall, officers consider that the proposed amendments represent a proportionate and well-judged evolution of the consented scheme. The scale, bulk and design of the development remain broadly consistent with the Original Consent and are acceptable in design terms.

12.0 Built Heritage

- 12.1 In accordance with Chapter 16 of the National Planning Policy Framework (NPPF), the impact of the proposed development on the significance of designated heritage assets and their settings has been carefully considered. London Plan Policy HC1 requires development proposals affecting heritage assets to conserve their significance and manage the cumulative effects of change, while London Plan Policy D3 and Local Plan Policy 28 require a design-led approach that responds appropriately to context and local character. These policies are of significant relevance given the site's proximity to the Grade II listed St Andrew's Church, which sits between Plots 9 and 10, as well as the locally listed Sun Public House and the Grade II listed Salem Baptist Church to the east.
- 12.2 Under the Original Consent, the design approach for Plots 9 and 10 was informed by a detailed Townscape and Heritage Visual Impact Assessment, which concluded that the approved scheme would integrate successfully into the surrounding townscape while preserving the setting of nearby heritage assets. The current Section 73 application has been assessed against this established baseline. Officers are satisfied that the proposed amendments do not depart from the approved heritage strategy and, in several respects, further reduce potential impacts. The reduction in building heights to a maximum of six storeys on Plot 9 and a consistent four storeys on Plot 10, alongside the consolidation of massing and refined setbacks, reduces visual competition with St Andrew's Church and strengthens the hierarchy between the church and surrounding development.
- 12.3 In particular, increased separation distances along the boundaries closest to the churchyard enhance openness and improve key heritage views, ensuring that the church remains visually prominent within the local townscape. Minor refinements to building footprints and façade alignment have been undertaken to optimise layouts while reinforcing the relationship between the church, Cotleigh Road and the wider masterplan. Public realm enhancements along the churchyard edge and St Andrew's Road further improve the setting of the heritage asset and contribute positively to local character.
- 12.4 The submitted heritage evidence, including the Statement of Conformity prepared by Portico Heritage and the EIA Statement of Conformity, confirms that the amended proposals do not give rise to any new or additional heritage harm beyond that previously assessed and, in some respects, result in a marginal enhancement due to reduced height and massing. Officers afford significant weight to this assessment and are satisfied that the proposals preserve the significance and setting of nearby heritage assets in accordance with the NPPF, London Plan Policy HC1, and the Havering Local Plan. The development is therefore considered acceptable in heritage and townscape terms and raises no objections on this basis.

13 Quality of the housing provision

- 13.1 London Plan Policy D6 requires residential development to deliver high-quality accommodation with adequately sized rooms, functional internal layouts and good standards of amenity, regardless of tenure. The policy emphasises that qualitative factors such as internal space, daylight, outlook, privacy, accessibility and access to private and communal amenity space are critical to achieving successful and sustainable residential environments. These principles are reflected in the objectives of the NPPF, which seeks to ensure a high standard of amenity for future occupants, and Havering Local Plan Policy 7, which requires development to provide high-quality living conditions for all residents.
- 13.2 The original hybrid permission (ref: P0761.20) established an accepted baseline for the quality of residential accommodation across the Waterloo Estate masterplan, including compliance with the nationally described space standards, minimum floor-to-ceiling heights, and appropriate private and communal amenity provision. The Section 73 amendments do not seek to vary the approved residential quantum, tenure mix or unit standards. Instead, the proposed refinements to massing, footprint and core arrangements have been assessed as maintaining, and in some respects improving, the efficiency and functionality of internal layouts when compared with the consented scheme.
- 13.3 The submitted plans demonstrate that all residential units could continue to meet or exceed the nationally described internal space standards and would provide well-proportioned, usable rooms with clear separation between habitable spaces and circulation areas. The rationalisation of building cores and the consolidation of footprints allow for a higher proportion of dual-aspect units, improved internal daylight penetration and enhanced opportunities for cross-ventilation. These changes are consistent with the design principles established under the Original Consent and with the requirements of London Plan Policy D6.
- 13.4 Private amenity space is provided for all dwellings, either in the form of private gardens, balconies or terraces, in accordance with the standards set out in the London Plan and the Havering Residential Design SPD. In addition, residents will benefit from access to high-quality communal amenity spaces and the wider network of landscaped public realm delivered as part of the Waterloo Estate masterplan. The scale, layout and orientation of these spaces have been designed to maximise usability, privacy and access to sunlight, contributing positively to the day-to-day living conditions of future occupants.
- 13.5 In terms of accessibility, the applicant submits that the proposals would continue to comply with the requirements of Building Regulations Part M, with all dwellings designed to meet M4(2) “accessible and adaptable” standards, and a proportion of units provided in accordance with M4(3) “wheelchair user”

standards, consistent with the Original Consent. This ensures that the development delivers inclusive housing capable of meeting a wide range of needs over the lifetime of the buildings, in line with London Plan Policy D7 and Havering Local Plan Policy 7.

- 13.6 Officers have also considered the quality of accommodation in the context of residential amenity, including daylight, sunlight, outlook and privacy. As set out elsewhere in this report, updated technical assessments confirm that the proposed amendments would not result in unacceptable impacts on these matters and, in several respects, represent an improvement over the consented scheme. The reduced building heights and increased separation distances at key interfaces further support good standards of outlook and reduce the perception of enclosure for both existing and future residents.
- 13.7 Overall, officers are satisfied that the proposed Section 73 amendments would continue to deliver a high standard of residential accommodation, consistent with the quality benchmarks established by the Original Consent. The development would provide safe, inclusive and comfortable living environments for future occupants and would comply with the requirements of the NPPF, London Plan Policy D6, and Havering Local Plan Policy 7

14 Impact on Neighbouring Amenity

- 14.1 Havering Local Plan Policy 7 states the council will not support applications where the proposal results in unacceptable overshadowing, loss of sunlight/daylight, overlooking or loss of privacy to existing and new properties and has unreasonable adverse effects on the environment by reason of noise impact, vibrations and disturbance.

Daylight and Sunlight

- 14.2 Daylight, Sunlight and Overshadowing
- 14.3 The proposed Section 73 amendments for Plots 9 and 10 involve modest reductions in overall building heights and the consolidation of approved building footprints, alongside minor adjustments to the approved parameter plans. These changes arise primarily from the rationalisation of the building core strategy, the removal of dual-core arrangements, and refinements to layouts to improve efficiency, buildability and compliance with updated Building Regulations. Officers have assessed whether these amendments would materially alter the daylight, sunlight and overshadowing impacts previously accepted under the Original Consent.
- 14.4 A Daylight and Sunlight Amenity Study (Neighbouring) has been prepared by Rapley's to assess the effects of the amended parameter plans on surrounding residential properties and external amenity spaces. The assessment undertakes a direct comparison with the approved outline scheme and applies the BRE guidelines in accordance with the Housing SPG. The report concludes that the levels of daylight and sunlight received by all assessed neighbouring

properties and amenity areas will remain satisfactory and that the proposed amendments broadly replicate the outcomes established under the Original Consent. Importantly, the study identifies slight improvements in a number of tested scenarios when compared with the previously approved scheme, reflecting the reduced building heights and more consolidated massing.

- 14.5 Officers have reviewed the submitted figures and conclusions and are satisfied that the amended scheme does not give rise to any new or materially worse daylight, sunlight or overshadowing impacts. The BRE guidance, when read alongside the positive test results and the established urban context of the site, confirms that neighbouring occupiers will continue to receive good levels of daylight and sunlight. On this basis, officers conclude that the proposed amendments comply with London Plan Policy D6, the Housing SPG, and Local Plan Policy 7, and that no unacceptable harm to residential amenity would arise.

Privacy and Overlooking

- 14.6 The proposed amendments to Plots 9 and 10 have been specifically designed to maintain, and in some respects improve, the privacy and outlook relationships established under the Original Consent. The reduction in height of Plot 9 from up to eight storeys to a maximum of six storeys, together with the adoption of a consistent four-storey height across Plot 10, reduces the overall scale of development and lessens the potential for overlooking and visual dominance when viewed from surrounding residential properties. The consolidation of building forms into single, coherent blocks also reduces the extent of facing elevations and limits opportunities for direct overlooking.
- 14.7 The amended parameter plans further improve separation distances at the most sensitive site boundaries. In particular, the minimum distance to the northern boundary of Plot 9 has been increased from 5 metres to 7.75 metres, while the minimum distance to the southern boundary of Plot 10 has been increased from 5.8 metres to 6.3 metres. These increases provide additional visual relief, reduce perceived enclosure, and improve outlook for neighbouring residents, particularly along Cotleigh Road. Officers consider that these changes represent a tangible improvement when compared with the approved scheme.
- 14.8 Overall, officers are satisfied that the proposed amendments do not result in unacceptable overlooking, loss of privacy or harm to outlook for existing or future residents. The development continues to provide a high standard of residential amenity and is consistent with the requirements of NPPF paragraphs 130 and 135, London Plan Policy D3, and Havering Local Plan Policy 7. No objections are therefore raised on amenity grounds.
- 14.9 On this basis, the proposals are considered to comply with Policy D3 and D6 of the London Plan and Policy 7 of the Havering Local Plan, which require development to respect existing residential amenity in terms of privacy, overlooking, and visual dominance.

15 Transport & Highways

- 15.1 The Section 73 application does not propose any changes to the approved access arrangements, highway layout, parking provision, servicing strategy or internal circulation established under the original hybrid planning permission (ref: P0761.20). The development therefore continues to be assessed against the transport baseline already found acceptable by the Council, Transport for London and the Local Highway Authority. As confirmed by the submitted Transport Statement of Conformity, the proposed amendments to massing, layout and cores do not give rise to any changes in trip generation, modal split, parking demand or highway safety when compared to the consented scheme.
- 15.2 The original consent was supported by a comprehensive Transport Assessment and approved on the basis of a restrained parking strategy reflecting the site's variable Public Transport Accessibility Levels (PTAL 2–6a). A total of 370 car parking spaces were approved across the masterplan, equating to an overall ratio of 0.27 spaces per dwelling (based on up to 1,380 units). Of these, 80 spaces (5.8%) are designated for disabled users, with the detailed Phase 1 element providing 43 spaces (0.12 spaces per unit) and the outline phases capped at a maximum of 0.3 spaces per unit. This approach was considered acceptable having regard to the site's accessibility, the need to re-provide parking for existing residents, and compliance with London Plan maximum standards for Outer London locations. The approved quantum of parking remains unchanged by this application.
- 15.3 Cycle parking provision also remains as approved, comprising 640 long-stay cycle spaces and 11 short-stay spaces, fully compliant with London Plan Policy T5. The original permission secured conditions requiring compliance with the London Cycle Design Standards, including the provision of Sheffield stands (with at least 20% at standard spacing and 5% at wider spacing), and these requirements continue to apply. Servicing, refuse collection and emergency vehicle access arrangements are likewise unchanged and were previously assessed as acceptable by the Council's Highway Officer and TfL.
- 15.4 In policy terms, the proposals remain consistent with the objectives of the NPPF, particularly paragraph 155, by prioritising sustainable transport modes, ensuring safe and suitable access for all users, and avoiding any severe residual impacts on the highway network. The development continues to align with London Plan Policies T1, T2, T5, T6 and T7 by promoting walking, cycling and public transport use, applying a Healthy Streets approach, maintaining a restrained parking provision, and ensuring appropriate servicing arrangements. At the local level, the scheme remains compliant with LBH Local Plan Policy 24, with parking provision already designed as an integral part of the masterplan and supported by secured measures including car-free permit restrictions pursuant to Section 16 of the Greater London Council (General Powers) Act 1974, CPZ contributions, a Car Parking Design and Management Plan, and EV charging infrastructure (20% active and 80% passive provision).

15.5 Overall, given that the proposed Section 73 amendments do not alter the approved transport strategy or parking quantum, and that the development continues to operate within the parameters previously accepted by the Local Highway Authority and TfL, it is concluded that the proposals remain acceptable in highway and transport terms and would not result in unacceptable impacts on highway safety, parking conditions or the operation of the surrounding road network.

16 Other issues

16.1 Flood Risk & Drainage

16.2 The application site lies wholly within Flood Zone 1, as defined by the Environment Agency, and is therefore at low risk of flooding from fluvial or tidal sources. The site is not located within a Critical Drainage Area and there is no evidence of historic surface water or groundwater flooding affecting the site. These baseline conditions are unchanged from those assessed under the original hybrid planning permission granted in 2020.

16.3 The Section 73 application does not propose any changes to the approved drainage strategy or drainage hierarchy. A Flood Risk Assessment and Drainage Strategy (Arden Consulting Engineers, October 2024) has been submitted to demonstrate continued compliance with the NPPF (2024), London Plan Policy SI12, and Havering Local Plan Policy 32. The strategy confirms that post-development surface water runoff rates will be restricted to greenfield equivalent rates, with attenuation provided through a combination of permeable paving, below-ground attenuation tanks and cellular storage beneath shared surface areas. Surface water will discharge at a controlled rate to the public surface water sewer network via an on-site connection.

16.4 Foul drainage arrangements also remain unchanged from the consented scheme, with foul flows directed to the existing public foul sewer via a separate connection. Thames Water has raised no objection in principle, subject to standard conditions requiring confirmation of final connection points and capacity at the detailed design stage. The Council's Lead Local Flood Authority has similarly confirmed that the proposed approach remains acceptable in principle, subject to conditions securing detailed design, maintenance and management arrangements.

16.5 Given that the proposed Section 73 amendments do not materially alter site levels, impermeable areas or drainage routes, and that the drainage strategy remains consistent with that previously approved, officers are satisfied that the development would not increase flood risk elsewhere nor expose future occupants to unacceptable risk. Subject to the re-imposition of updated drainage conditions reflecting current policy wording, the proposals are considered compliant with national, regional and local flood risk and drainage policy.

17.0 Land Contamination

- 17.1 The site comprises previously developed land, historically used as surface-level car parking, and does not include any known former industrial or high-risk contaminative uses. These baseline site conditions remain unchanged from those assessed at the outline stage in 2020. Notwithstanding this, the site's urban context gives rise to a potential for made ground and localised contamination, particularly associated with historic vehicle use.
- 17.2 A Phase 1 Preliminary Risk Assessment (Ardent Consulting Engineers, October 2024) has been submitted in support of the Section 73 application. The assessment identifies a low to moderate potential risk from common urban contaminants, including hydrocarbons, but confirms that no significant contaminant linkages have been identified at this stage. The report recommends further intrusive investigation to confirm ground conditions prior to development.
- 17.3 The Council's Environmental Health Officer has reviewed the submission and raised no objection, subject to conditions requiring a Phase 2 site investigation, remediation strategy (if necessary), and verification reporting prior to occupation. These conditions are consistent with those imposed on the original permission and remain appropriate given that the proposed amendments do not alter ground disturbance or introduce new sensitive receptors beyond those already consented.
- 17.4 Subject to the imposition of these standard conditions, officers are satisfied that the proposed Section 73 development would not pose an unacceptable risk to human health or the environment and remains compliant with the NPPF, London Plan Policy D13, and Havering Local Plan Policy 33.

18. Sustainability & Energy Efficiency

- 18.1 The proposed Section 73 amendments do not alter the approved energy strategy or sustainability principles established under the original consent. However, the assessment must be considered against updated policy requirements, including London Plan Policy SI2 and Havering Local Plan Policy 35, which place increased emphasis on carbon reduction and climate resilience.
- 18.2 An updated Energy and Sustainability Statement (Etude, October 2024) has been submitted to confirm continued compliance. The strategy follows the Be Lean, Be Clean, Be Green hierarchy and confirms that the development would achieve a 41% reduction in regulated carbon emissions beyond Part L 2013, exceeding the London Plan's minimum on-site target of 35%. This reduction is achieved through enhanced fabric performance, energy-efficient building services, air source heat pumps, and photovoltaic panels on apartment block roofs.
- 18.3 Any residual regulated carbon shortfall would be addressed through a carbon offset contribution, calculated in accordance with the Council's adopted price per tonne and secured via the Section 106 Agreement. Officers note that this

approach is consistent with the original permission, although the precise offset sum will require updating to reflect current policy and indexation.

- 18.4 In addition, the scheme continues to incorporate wider sustainability measures, including water efficiency targets of 105 litres/person/day, sustainable drainage, urban greening and biodiversity enhancements, and passive design measures to promote daylight, ventilation and long-term adaptability. Officers are satisfied that, subject to updated conditions and S106 provisions reflecting current policy, the proposals remain compliant with London Plan Policies SI2, SI5 and D6, and Local Plan Policies 35 and 32.

19. Ecology and Biodiversity

- 19.1 The site is largely hard-surfaced with limited existing vegetation and is not subject to any statutory or non-statutory ecological designations. Its baseline ecological value is therefore low, consistent with the findings of the original 2020 permission.
- 19.2 A Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment (Ecology Solutions, October 2024) has been submitted to reflect the requirements of the Environment Act 2021 and updated NPPF policy. The appraisal confirms that no protected species or priority habitats are present and that the proposals would not give rise to significant adverse ecological impacts. The BNG assessment, prepared using the DEFRA metric, demonstrates that the development would deliver a measurable biodiversity net gain, secured through landscaping, habitat creation and management.
- 19.3 Proposed enhancements include native tree and shrub planting, wildflower grassland, green infrastructure corridors, bat and bird boxes, and SuDS features designed to support ecological connectivity. These measures represent a significant improvement over the existing baseline and are broadly consistent with those approved under the original consent, albeit updated to reflect current policy requirements.
- 19.4 The Council's Ecology Officer has recommended conditions to secure delivery, management and long-term maintenance of these measures. Subject to these conditions, the proposals are considered compliant with London Plan Policy G6 and Havering Local Plan Policy 30.

20. Trees

- 20.1 An updated Arboricultural Impact Assessment and Tree Protection Plan (October 2024) has been submitted. The assessment identifies 15 trees and groups within or adjacent to the site. While a limited number of low-quality trees are proposed for removal to facilitate development, the majority of higher-quality specimens are to be retained and protected during construction.
- 20.2 Replacement planting is proposed at a ratio exceeding 2:1, using native and climate-resilient species to enhance canopy cover and urban greening. Tree

protection measures in accordance with BS5837:2012 will be secured by condition. Officers consider that the proposals maintain a balanced and policy-compliant approach consistent with the original permission and compliant with London Plan Policy G7 and Local Plan Policy 27.

21. Air Quality

- 21.1 The site lies within the Havering Air Quality Management Area, declared for exceedances of NO₂ and PM₁₀. An Air Quality Assessment (October 2024) has been submitted and confirms that the proposals would not result in significant adverse air quality impacts. Vehicle trip generation remains unchanged from the consented scheme and is lower than the historic car park baseline.
- 21.2 All dwellings will be served by low-emission heating systems, including air source heat pumps, and the development incorporates EV charging and sustainable travel measures. The Council's Environmental Health Team has raised no objection, subject to standard construction dust and NRMM conditions. Officers consider the proposals acceptable in air quality terms and compliant with London Plan Policy S11 and Local Plan Policy 33.

22. Secure by Design / Community Safety

- 22.1 The proposals have been reviewed by the Metropolitan Police Designing Out Crime Officer, who raises no objection subject to the development achieving Secured by Design accreditation. The proposed layout incorporates active frontages, natural surveillance, clear delineation of public and private space, and appropriate lighting.
- 22.2 Given local crime statistics within the St Andrew's Ward, officers agree that robust preventative measures are required. A suitably worded condition is recommended requiring full Secured by Design compliance prior to occupation. Subject to this, the proposals are considered compliant with London Plan Policy D11 and Havering Local Plan Policies 7, 15 and 26.

23 EQUALITIES AND DIVERSITY

- 23.1 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:
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 23.2 For the purposes of this obligation the term protected Characteristics includes: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 23.3 In recommending the application for approval, officers have had regard to the requirements of the Act and have concluded that a decision to grant planning permission for this proposed development will comply with the Council's statutory duty.

24 CIL and other Financial and Mitigation measures

- 24.1 There would be no additional floor space and as such no additional CIL considerations.
- 24.2 The planning obligations recommended in this report have been subject to the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 and the obligations are considered to have satisfied the following criteria:-
- (a) Necessary to make the development acceptable in planning terms;
 - (b) Directly related to the development; and
 - (c) Fairly and reasonably related in scale and kind to the development.
- 24.3 The Section 106 Agreement attached to the original outline permission P0761.20 secures the full range of planning obligations necessary to mitigate the impacts of the development. A Section 73 application does not invalidate or supersede an existing legal agreement. However, where planning obligations make reference to approved parameter plans or condition numbers that are subject to variation under this application, a Deed of Variation is required to ensure that the agreement remains consistent, enforceable and operable through linking this application with the existing legal agreement and binding the planning obligations in the original Section 106 Agreement dated 12/11/2021 to this Section 73 proposal by deed of variation pursuant to section 106A of the Town and Country Planning Act (as amended) and all other enabling powers.

25 Conclusions

- 25.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. In the case of a Section 73 application, the decision-maker must consider the proposed variation in the context of the original permission and assess whether the amended scheme remains acceptable in planning terms.

- 25.2 The assessment set out within this report demonstrates that the proposed Section 73 amendments do not alter the fundamental nature of the development approved under the original hybrid planning permission (ref: P0761.20). The principle of the development, including the residential-led land use, quantum of development and affordable housing commitments, has been firmly established and remains a significant material consideration in the determination of this application.
- 25.3 The application seeks to vary approved plans to facilitate refinements to massing, layout and core arrangements in response to updated Building Regulations and technical delivery requirements. These amendments are modest in scale, do not result in any material increase in development quantum, and do not introduce new land uses. Importantly, they enable the delivery of 107 affordable homes within Plots 9 and 10 and support the timely implementation of this phase of the wider Waterloo Estate regeneration.
- 25.4 The proposals continue to make efficient use of a well-located brownfield site within the urban area and are strongly supported by national, regional and local planning policy, including the National Planning Policy Framework, the London Plan and the Havering Local Plan. Given the Council's housing land supply position and the acute local need for affordable housing, the delivery of 100% affordable homes in this phase attracts substantial weight in the planning balance.
- 25.5 The amended scheme has been carefully assessed in relation to design, scale, townscape and heritage. The refinements result in reduced building heights and consolidated massing, improving the relationship with the surrounding residential context and nearby heritage assets, including the Grade II listed St Andrew's Church. Officers are satisfied that the proposals preserve the significance and setting of designated heritage assets and, in some respects, result in a slight enhancement when compared with the consented scheme.
- 25.6 The impact of the proposals on residential amenity has been fully assessed. Updated daylight and sunlight analysis confirms that neighbouring properties would continue to receive acceptable levels of daylight and sunlight, with results consistent with, or improved upon, the approved scheme. Separation distances have been increased in key locations, reducing the potential for overlooking and perceived enclosure. Officers therefore conclude that the proposals would not result in unacceptable harm to the amenity of existing or future residents.
- 25.7. All other technical matters, including highways and transport, flood risk and drainage, land contamination, energy and sustainability, ecology and biodiversity, air quality, trees and community safety, have been reviewed and are considered acceptable. Where relevant, the original assessments remain valid, and where policy or regulatory requirements have evolved, these can be addressed through updated or additional planning conditions. The proposed development remains capable of being delivered in a safe, sustainable and policy-compliant manner.

25.8 Overall, officers conclude that the proposed Section 73 amendments accord with the Havering development plan when read as a whole and that there are no material considerations which indicate that planning permission should be withheld. The proposals secure significant public benefits, including the delivery of much-needed affordable housing, improved design efficiency, and the continued regeneration of the Waterloo Estate. The application is therefore recommended for approval, subject to appropriate planning conditions and the completion of any necessary legal agreement under Section 106 and Section 106A of the Town and Country Planning Act 1990 (as amended), and all other enabling powers.

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Application Reference: P1293.25

Location: Land bound by Waterloo Road to the east; the Great Eastern Main line to the South, Cotleigh Road to the west

Ward
St Edward's

Description: Application for approval of reserved matters following outline approval P0761.20 (Appearance, Landscaping, Layout and Scale) for Plots 9 and 10 of the Waterloo Estate to provide residential units, community use, public realm, private amenity space, car parking and associated works pursuant to Condition 2 of Planning

Case Officer: Malachy McGovern

Reason for Report to Committee:

- Application is for proposal related to application on this agenda

1 BACKGROUND

1.1 The application has been prepared by Avison Young ('AY') on behalf of Havering and Wates Regeneration LLP ('the Applicant'). The application site forms part of the wider Waterloo and Queen Street regeneration area, which benefits from an outline planning permission granted by the London Borough of Havering on 12 November 2021 under reference P0761.20.

1.2 The permission is a hybrid (part outline, part detailed) consent for the phased redevelopment of land bounded by Waterloo Road, Queen Street, London Road and the Great Eastern Main Line, comprising up to 1,380 residential units (Use Class C3), with 40% affordable housing, flexible commercial and community uses, open space, public realm, parking, play space, highways works and associated infrastructure. In relation to the outline element of the permission, all matters were reserved except for access.

- 1.3 The outline consent established the development parameters and principles for the site through a suite of approved documents, including the Parameter Plans, Design Code, and Development Specification, which together define the maximum heights, footprints, land uses, access arrangements and landscape framework for each development plot.
- 1.4 The current application seeks Reserved Matters approval for Plots 9 and 10, and has been submitted alongside a separate Section 73 application reference P1297.25 which seeks to amend the approved parameter plans to reduce maximum building heights and rationalise footprints. The Reserved Matters submission therefore relates to layout, scale, appearance and landscaping, and must be assessed against the parameters and principles set by the outline permission (as amended).

2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 2.1 The Reserved Matters application has been assessed against the approved outline planning permission P0761.20, the associated parameter plans, the Design Code, and the Development Specification, together with relevant national, regional and local planning policy.
- 2.2 Officers consider that the submitted details for Plots 9 and 10 are in material compliance with the outline consent, respond positively to the design guidance set by the Design Code, and provide a high-quality residential environment supported by appropriate access, landscaping and community infrastructure.
- 2.3 The proposals are considered acceptable in terms of layout, scale, appearance, residential amenity, townscape impact and landscaping, and raise no new matters of principle beyond those already established by the outline permission.
- 2.4 The proposal is therefore in accordance with the development plan and there are no material considerations that indicate planning permission should be refused. Accordingly, the Reserved Matters application is recommended for approval, subject to conditions.

3 RECOMMENDATION

- 3.1 That the Committee resolve to GRANT Reserved Matters subject to the granting of permission for the s73 application (P1297.25 - including the deed of variation) and the conditions set out in this report.

Conditions

1. Approved Plans

2. Materials

4. Site and Surroundings

- 4.1 The application site comprises Plots 9 and 10 within the wider Waterloo and Queen Street regeneration area. The plots are located to the south-western portion of the outline site, bounded by Queen Street and Cotleigh Road, and in proximity to St Andrew's Church and the adjoining railway corridor. The larger hybrid 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. The site falls within a Romford Strategic Development Area (SDA). Romford town centre lies immediately east of the site.
- 4.2 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.
- 4.3 The site does not fall within a conservation area and there are no listed buildings on site. However there are 3 Grade II listed buildings adjacent to or near the site (St Andrews Church, Salem Baptist Chapel and the Sun Public House) located at the western and northern edges of the applications site. The Romford Town Centre Conservation Area is also located to the east.
- 4.4 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).
- 4.5 The site also falls within an Air Quality Management Area (AQMA) and within the Romford Strategic Development Area .

5.0 Proposed development

- 5.1 The Reserved Matters application seeks approval for the detailed design of two residential buildings on Plots 9 and 10, within the parameters set by the outline permission (as amended).
- 5.2 Plot 9 has outline consent for a part four, part six storey building delivering 70 residential dwellings, together with a community use (Use Class E) at ground

floor level, residential entrances, circulation space, plant, landscaping, and 31 car parking spaces, along with cycle storage and associated infrastructure.

- 5.3 Plot 10 comprises a four storey residential building delivering 37 dwellings, together with associated landscaping, cycle storage, refuse provision, access arrangements and infrastructure.
- 5.4 The proposals include new areas of public and private amenity space, integrated landscaping, pedestrian and cycle routes, and interfaces with the wider public realm, consistent with the approved landscape and movement strategies for the Waterloo and Queen Street masterplan.
- 5.5. The Reserved Matters submission includes detailed information on appearance, scale, layout and landscaping and has been prepared in accordance with the approved Design Code and Development Specification

5.6 Compliance with the Original Permission:

- 5.7 The outline planning permission P0761.20 establishes the principle of residential and community development on Plots 9 and 10, together with the maximum parameters for height, massing, land use, access and landscape treatment. It should be noted that this Reserved Matters application has been submitted in parallel with a s73 application reference P1297.25 which seeks to vary the parameter plans of buildings within Plots 9 and 10. The s73 application seeks minor alterations to the building footprint and to reduce the building heights in response to recent fire regulations changes. This RM application therefore relates to the proposal within the parameter plans as amended by the s73 application reference P1297.25 and not those approved by the original permission ref. P0761.20.

- 5.8 Officers are satisfied that the Reserved Matters proposals for Plots 9 and 10:

- Fall within the approved plot envelopes;
- Do not exceed the maximum building heights set by the amended parameter plans;
- Comply with the approved land use parameters;
- Align with the movement and access strategy fixed at outline stage; and
- Respond appropriately to the Design Code, including guidance on scale, articulation, materials, public realm and residential quality.

- 5.9 The Reserved Matters application therefore accords with the requirements of the original outline consent P0761.20 as amended by P1297.25 and does not raise any new or unresolved issues of principle.

6. Planning History

6.1 The Original Planning Permission (ref: P0761.20)

- 6.2 The hybrid planning permission (Ref. P0761.20) (the *Original Consent*) was granted on **12 November 2021** for the comprehensive redevelopment of the site. The description of the approved development is as follows:

“Hybrid (part outline, part detail) planning application for the phased redevelopment of the site comprising demolition and the provision of up to 1,380 (Use Class C3) residential units (40% affordable), built over 3–16 storeys, flexible commercial floorspace (Use Classes A1–A4, B1, D1/D2), community floorspace, open space and associated public realm improvements, parking, play space, highways improvements and a central cycle route. Outline with all matters reserved (except access) and Detailed Full Planning for Phase 1.”

- 6.3 The Original Application was subject to an Environmental Impact Assessment. The approved development comprised five phases, with the detailed element including Block 1 and Block 2. The detailed element of the scheme has been implemented; however, in 2023 construction on site was paused following amendments to national regulations, including the requirement for second stair cores within residential developments above a specified height threshold, which rendered the approved scheme unviable in its consented form.
- 6.4 The Original Consent has subsequently been varied and supplemented through a series of applications, as outlined below.

6.5 Amendments to the Original Consent

- 6.8 Discharge of Condition (ref: Q0194.24) was approved on 7 November 2024 for the re-discharge of Condition 7 (Phasing) to include an updated phasing plan incorporating a new Phase 1C, which includes part of the originally consented Village Green.
- 6.9 Non Material Amendment (ref: N0059.24) was approved on 14 February 2025 to amend the trigger of Condition 8 of the Original Consent (Ref. P0761.20) to align with the amended phasing strategy and the introduction of Phase 1C. As the proposal only sought to bring forward a limited part of the Village Garden, the amendment allowed for the updated Design Code to be submitted *prior to the submission of the second Reserved Matters application*, enabling it to be brought forward at a later, more appropriate stage.
- 6.10 Approval of RM (ref: P1392.24) was approved on 20 March 2025 for the *Approval of Reserved Matters (appearance, landscaping, layout and scale)* pursuant to outline permission P0761.20, in association with part of the Village Garden. The series of applications outlined above were submitted to support

the ongoing deliverability of the parent permission and to provide the necessary flexibility for effective implementation.

- 6.11 An application (ref: Q0107.25) was submitted on 2 June 2025 to discharge Condition 8 (Design Code) in relation to the forthcoming Reserved Matters Application for Plots 9 and 10 at the Waterloo Estate. The submitted Addendum ensures that forthcoming Reserved Matters applications and future phases of the masterplan are underpinned by an up-to-date design framework that aligns with the principles of the Original Consent while responding to evolving policy and technical requirements.

7.0 LOCAL REPRESENTATIONS

- 7.1 129 letters of notifications were sent to the adjoining occupiers on the 8th October 2025. No objections were received.

Internal and External Consultation:

7.2 Internal Consultees

LBH Urban Design – No objection
LBH Heritage (Place Services) – No objection
LBH Environmental Health (Noise & contamination) - No response
LBH Environmental Health (Air quality) - No objection
LBH Landscape (Place Services) – No objection
LBH Ecology (Place Services) – No objection subject to conditions
LBH Trees (Place Services) – No objection
LBH Waste & Recycling - No objection
LBH Education - – No response
LBH Local Lead Flood Officer – No objection

7.3 External Consultees

Anglican Water Authority – No objection

Thames Water – No objection

Essex & Suffolk Water – No objection

UKPN – No objection

London Fire – No objection

Historic England – No objection

Active Travel England – No objection

Environment Agency – No objection

Metropolitan Police – No objection subject to conditions

8 MATERIAL PLANNING CONSIDERATIONS

8.1 The main issues for consideration for this application are:

- Principle of development
- Consideration of the Reserved Matters
 - Appearance
 - Scale
 - Layout
 - Landscaping
 - Built Heritage
- Equalities and Diversity
- Conclusion

9.0 Principle of Development

- 9.1. The principle of comprehensive residential-led redevelopment of the site has been established through the extant outline planning permission (ref. P0761.20).
- 9.2. The purpose of this Reserved Matters application is to assess whether the submitted details for Plots 9 and 10, relating appearance, scale, layout and landscaping, accord with the approved parameter plans, Design Code and Development Specification, and whether they give rise to any unacceptable impacts not previously identified at outline stage.
- 9.3 Plots 9 and 10 form part of the outline element of the consent and were expressly anticipated to come forward through a subsequent Reserved Matters application. The development proposed is therefore fully consistent with the approved development strategy and phasing arrangements.
- 9.5. Overall, officers are satisfied that the Reserved Matters proposals do not undermine the land use strategy or affordable housing objectives secured through the outline consent and that the development continues to accord with the strategic objectives of the London Plan, the Havering Local Plan, and the National Planning Policy Framework in respect of housing delivery.

10. Outline Consent Context and Consideration of Reserved Matters

- 10.1. The hybrid outline planning permission (ref: P0761.20) as emended by S73 ref. P1927.25 establish the principle of development and approved a

comprehensive design framework for the Waterloo Estate, including Parameter Plans, a Design Code, an Outline Design and Access Statement, and a Townscape and Heritage Visual Impact Assessment. These documents fixed the maximum heights, massing envelopes, land uses, access points and movement structure, and identified Plots 9 and 10 as residential-led development parcels within the wider masterplan.

- 10.2 The outline permission reserved matters relating solely to appearance, scale, layout and landscaping for subsequent approval. The role of this Reserved Matters application is therefore limited to assessing whether the detailed proposals comply with the approved outline parameters and design framework, and whether they deliver an acceptable detailed design solution in accordance with the development plan and the approved Design Code. The principle of development, access arrangements, quantum of development and land use are not matters for reconsideration.

11.0 Appearance

11.1 Appearance – Outline Consent Requirements

- 11.2 The outline planning permission (ref. P0761.20), as amended by the approved Section 73 permission, did not fix the detailed appearance of development within Plots 9 and 10 but established a comprehensive design framework through the approved Parameter Plans, Design Code and Outline Design and Access Statement. While the parameter plans do not strictly regulate architectural appearance, the Design Code provides detailed and prescriptive guidance on the expected architectural quality and character of Reserved Matters submissions. In particular, the Design Code sets out mandatory, recommended and discretionary requirements in respect of roof profiles, façade articulation, materiality, fenestration and architectural detailing. The purpose of this Reserved Matters submission is therefore to demonstrate that the detailed appearance of the proposed buildings accords with the approved Design Code and delivers a high-quality architectural response consistent with the outline consent.

11.3 Architectural Approach and Design Rationale

- 11.4 The appearance of Plots 9 and 10 has been developed in accordance with the approved Design Code and is informed by the architectural character, scale and materiality of the surrounding area, including the adjacent Grade II listed St Andrew's Church. The submitted Design and Access Statement demonstrates a coherent architectural strategy which seeks to balance robustness, longevity and contextual response with a contemporary residential character appropriate to this location within the Waterloo Estate masterplan.
- 11.5 Both buildings are articulated with a clear expression of base, middle and top, a principle established at outline stage and reinforced through detailed design. This approach assists in breaking down the perceived scale of the buildings, improves legibility, and ensures that the development responds appropriately to its sensitive townscape and heritage context.

11.6 Plots 9 and 10 are intentionally designed as a closely related architectural cluster, using a shared material palette and consistent detailing to create visual coherence, while allowing for variation in form and articulation to respond to differences in location, orientation and scale.

11.7 Plot 9: Materials, Brickwork and Elevational Articulation

11.8 The scale and massing of Plot 9 is carefully managed through the use of a light, warm-toned brick, selected following officer engagement and material testing. The elevations are articulated horizontally through the introduction of light brick banding at each level, providing subtle modulation and reducing visual bulk.

11.9 The parapet level is emphasised through a double horizontal soldier course, wrapping around the building to provide a clear termination and a refined roofline expression. Brickwork is predominantly laid in a standard stretcher bond to ensure visual clarity and restraint, with the use of contrasting horizontal soldier courses providing interest without excessive variation.

11.10 The northern corner of Plot 9, addressing St Andrew's Church, is given particular emphasis. This elevation is more articulated to acknowledge its prominence and to provide appropriate hierarchy and visual interest when viewed alongside the church. Brick detailing around the Community Space includes contrasting darker brick reveals above windows and doors, reinforcing active frontages and clearly signalling entrances at ground level.

11.11 The principal residential entrances to both the northern and southern elements of Plot 9 are expressed as significant architectural features. These are articulated using rusticated brickwork, integrated entrance canopies and recessed doorways, all of which are consistent with the overall façade modelling and contribute positively to legibility and sense of arrival.

11.12 Plot 10: Materials, Form and Corner Treatment

11.13 Plot 10 adopts a closely aligned material strategy to Plot 9 in order to reinforce the two buildings as a cohesive group within the masterplan. The building is clad in the same light, warm-toned brick, rising from a textured rusticated ground floor which visually anchors the building and reinforces its relationship with the public realm.

11.14 To further articulate the base, darker-toned recessed and rusticated brickwork is employed at lower levels, providing contrast and grounding the building visually. The top of the building is expressed through a recessed parapet with dark metal coping, creating a distinct 'crown' and reinforcing the hierarchy between base, middle and top.

11.15 Elevations along Cotleigh Road and St Andrew's Road are articulated as a series of vertical bays, creating a refined and elegant street frontage. At the junction with London Road, the building adopts a distinctive chamfered 'flat iron' form, responding dynamically to the angled convergence of streets and marking

the corner as a local focal point. This feature is further emphasised through a stepped parapet and refined detailing.

- 11.16 The main residential entrance to Plot 10 is centrally located along St Andrew's Road and is semi-recessed beneath a balcony. The entrance is articulated with textured brickwork to provide hierarchy, visual clarity and a strong sense of address, while maintaining consistency with the overall façade composition.

11.17 Fenestration, Glazing and Visual Rhythm

- 11.18 Across both plots, windows and doors to residential units, lobbies, community space and service areas are specified as bronze metal, selected to complement the warmth of the brickwork and provide a high-quality, durable finish.
- 11.19 Fenestration is predominantly vertically proportioned, reinforcing the residential character of the development and aligning with the principles set out in the Design Code. Windows are generally set within single brick reveals, with many arranged in recessed brick bays to create depth, shadow and visual interest across the façades.
- 11.20 At lower levels on Plot 10, windows are taller and more rectangular in proportion, referencing historic building typologies and reinforcing the base of the building. Upper-level windows are intentionally smaller, strengthening the visual hierarchy and reducing perceived mass at higher levels.
- 11.21 Balcony doors and windows are typically arranged as paired elements with floor-to-ceiling glazing to maximise daylight penetration into living spaces. All windows are designed to be accessible from within the apartments for maintenance and cleaning, with a minimum 1100mm transom or cill height, ensuring compliance with safety and usability requirements.
- 11.22 Glazing is specified as clear throughout and designed to meet required thermal, acoustic and daylight performance standards.

11.23 Balconies and Relationship to the Façade

- 11.24 Balconies are fully integrated into the architectural composition of both buildings and play a key role in reinforcing the vertical bay structure of the elevations. Their positioning creates a consistent rhythm across façades and directly corresponds to internal living spaces, enhancing legibility and architectural coherence.
- 11.25 Balustrade design has been carefully considered to balance privacy and openness. The detailing provides appropriate screening for residents while allowing outward views when seated, contributing to residential amenity without compromising the visual quality of the elevations.

11.26 Relationship with the Public Realm

11.27 At ground floor level, the appearance of both buildings is designed to positively engage with the public realm. Active frontages are maintained along key pedestrian routes, with entrances clearly expressed through material changes, recessed thresholds and architectural detailing.

11.28 The articulation of ground floor façades, combined with high-quality materials and glazing, contributes to a safe, animated and visually engaging streetscape. Officers consider that this approach supports passive surveillance, reinforces wayfinding and enhances the overall quality of the public realm.

11.29 Officer Assessment and Policy Compliance

11.30 Officers are satisfied that the appearance of Plots 9 and 10 represents a high-quality, well-resolved and policy-compliant implementation of the approved Design Code and outline consent. The architectural detailing demonstrates a strong response to context, heritage setting and public realm considerations, while delivering a robust and contemporary residential character.

11.31 The proposals are considered to comply with London Plan Policies D3 and D4, NPPF Chapter 12, and Havering Local Plan Policy 26, and no objections are raised in respect of appearance.

12.0 Scale

12.1 Scale – Outline Consent Requirements

12.2 The scale of development across the Waterloo Estate, including Plots 9 and 10, was firmly established at outline stage through the approved Parameter Plans, which defined maximum building heights, massing envelopes and storey ranges. These parameters were subsequently refined through the Section 73 permission, which adjusted approved heights and massing to respond to updated building regulations and technical requirements. As such, the principle and acceptability of scale is not revisited through this Reserved Matters application. The assessment of scale is therefore limited to confirming that the detailed proposals remain fully within the approved parameter envelopes and that the resulting built form appropriately reflects the hierarchy and townscape principles established by the outline consent and Design Code.

12.3 Assessment of Scale

12.4 The scale of development is controlled by the approved Parameter Plans and has been refined through the Section 73 proposal ref. P1297.25. The Reserved Matters proposals remain fully within these approved parameters.

12.5 Plot 9 rises to a maximum of six storeys, with articulation and stepping used to reduce perceived massing, while Plot 10 maintains a consistent four-storey scale appropriate to its immediate residential surroundings. Building heights, proportions and massing align with the hierarchy established across the Waterloo Estate and respect the prominence of St Andrew's Church.

- 12.6 Given that scale has been fixed in principle at outline stage, officers are satisfied that the submitted details accord with the approved parameters and raise no concerns in terms of townscape or visual impact

13.0 Layout

13.1 Layout – Outline Consent Requirements

- 13.2 The outline consent approved the strategic layout of the Waterloo Estate, including the overall block structure, movement framework, access points and relationships between buildings, streets and open spaces. The approved Parameter Plans and Design Code establish the fundamental layout principles for Plots 9 and 10, including perimeter block formation, active frontages, entrance locations and spatial relationships with St Andrew’s Church and surrounding streets. The Reserved Matters submission is required to demonstrate compliance with these principles by providing a detailed layout that aligns with the approved masterplan structure, delivers legible and functional residential environments, and integrates servicing, refuse and cycle provision without undermining the quality of the public realm.

13.3 Assessment of Layout

- 13.4 The submitted layout for Plots 9 and 10 closely follows the spatial principles established at outline stage and within the approved Design Code. Building footprints are arranged to reinforce clear perimeter blocks, define streets and public spaces, and provide a strong urban edge to the adjoining routes while creating legible and defensible residential entrances.
- 13.5 Plot 9 is arranged to address the primary movement routes through the estate and to frame key views towards St Andrew’s Church, whilst Plot 10 adopts a simpler, more regular footprint reflecting its residential context. The relationship between buildings, streets and open spaces is clear and coherent, with entrances fronting onto public routes to promote natural surveillance and active frontages.

13.6 Internal and External Relationships

- 13.7 The layout enables appropriate separation distances between buildings, consistent with those envisaged at outline stage, and supports a high proportion of dual-aspect dwellings. Servicing, refuse storage and cycle parking are discreetly integrated within the block layouts without undermining the quality of the public realm.
- 13.8 Officers consider that the submitted layout delivers a logical, legible and policy-compliant arrangement that faithfully implements the approved masterplan structure and Design Code.

14.0 Landscaping

14.1 Landscaping – Outline Consent Requirements

14.2 Landscaping principles for the site were established at outline stage through the approved Design Code, outline landscape strategy and parameter plans, which identified the role of public realm, green infrastructure and planting in structuring the masterplan and mitigating the scale of development. While the outline consent did not approve detailed landscaping, it set clear expectations regarding the hierarchy of spaces, treatment of key routes, interface with St Andrew's Church, and integration of soft landscaping with built form. The Reserved Matters application is therefore required to provide a detailed landscaping scheme that accords with these principles, enhances townscape quality, supports residential amenity and biodiversity objectives, and delivers a cohesive and high-quality public realm consistent with the outline consent and subsequent Section 73 amendments.

14.2 Landscape Strategy

14.3 The landscaping proposals form a fundamental component of the Reserved Matters submission and are integral to the overall quality and legibility of the scheme. The landscape strategy builds upon the outline landscape principles and seeks to deliver a cohesive, high-quality public realm that supports movement, biodiversity and residential amenity.

14.4 A hierarchy of spaces is created, including primary streets, secondary routes, shared surfaces and private amenity areas. Hard and soft landscaping are carefully balanced to provide visual relief, shade and seasonal interest while maintaining permeability and accessibility.

14.5 Planting and Public Realm

14.6 Tree planting is used strategically to define streets, soften building edges and frame views, including towards St Andrew's Church. Species selection prioritises resilience, biodiversity value and long-term growth, consistent with the approved Design Code and urban greening objectives. Shrubs, groundcover and ornamental planting are used to reinforce defensible space and enhance the quality of residential frontages.

14.7 High-quality paving materials, planting buffers, seating, boundary treatments and lighting are proposed to create a cohesive and attractive public realm. Boundary treatments are carefully designed to balance privacy and permeability, particularly along sensitive edges adjoining existing residential areas and the churchyard.

14.8 Integration with Built Form

14.9 The landscaping proposals integrate seamlessly with the building layouts, reinforcing entrances, routes and key spaces. Private and communal amenity areas are clearly defined and benefit from appropriate levels of enclosure, planting and overlooking to ensure safety and usability.

14.10 Officers are satisfied that the landscaping proposals provide a high-quality setting for the development, enhance the character of the area and comply with

the outline consent, the Design Code, London Plan Policy G5 and Havering Local Plan Policy 27.

15.0 Built Heritage

- 15.1. In accordance with Chapter 16 of the NPPF, the impact of the proposed development on the significance of designated heritage assets and their settings has been carefully considered. London Plan Policy HC1 requires development proposals affecting heritage assets to conserve their significance, while Havering Local Plan Policy 28 requires a design-led response to local character.
- 15.2. The site lies adjacent to the Grade II listed St Andrew's Church, with the locally listed Sun Public House and the Grade II listed Salem Baptist Church also located nearby. The outline consent was supported by a detailed Townscape and Heritage Visual Impact Assessment, which established that the approved masterplan would preserve the setting of these assets.
- 15.3. The Reserved Matters proposals have been assessed against this established baseline. Officers are satisfied that the submitted layout, scale and massing do not depart from the approved heritage strategy and, in several respects, further reinforce the prominence and setting of St Andrew's Church through reduced height, increased separation distances and enhanced public realm treatment.
- 15.4. The submitted heritage evidence confirms that the proposals do not give rise to any new or additional heritage harm beyond that previously assessed. The Council's Heritage officer has raised no objection to the proposals. Officers therefore conclude that the development preserves the significance and setting of nearby heritage assets in accordance with the NPPF, London Plan Policy HC1, and the Havering Local Plan.

16 EQUALITIES AND DIVERSITY

- 16.1 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:
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 16.2 For the purposes of this obligation the term protected Characteristics includes: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 16.3 In recommending the application for approval, officers have had regard to the requirements of the Act and have concluded that a decision to grant planning permission for this proposed development will comply with the Council's statutory duty.

17 CIL and other Financial and Mitigation measures

- 17.1 There would be no net additional floorspace and no additional CIL requirements.
- 17.3 The principle, quantum and mitigation of the development are secured through the existing Section 106 Agreement attached to the outline permission. Reserved Matters approvals do not give rise to new planning obligations.

18. Conclusions

- 18.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. In the case of a Reserved Matters application, the decision-maker must consider whether the detailed proposals accord with the parameters, conditions and design principles established by the extant outline planning permission, and whether the reserved matters sought are acceptable in their own right.
- 18.2 The outline element of the hybrid planning permission (ref. P0761.20) firmly established the principle of comprehensive residential-led redevelopment of the Waterloo Estate, including the approved land use mix, maximum residential quantum, access arrangements and strategic design framework. The Reserved Matters application relates to Plots 9 and 10 and seeks approval of appearance, scale, layout and landscaping within the scope of that consent.
- 18.3 The detailed proposals have been carefully assessed against the approved parameter plans, Design Code and supporting outline documentation. Officers are satisfied that the Reserved Matters scheme accords with the approved development envelope, building height limits, and design principles, and does not result in any material departure from the outline consent. The proposals provide a coherent and legible layout, appropriate scale and massing, and a high-quality architectural response consistent with the wider Waterloo Estate masterplan.
- 18.4 The development will deliver 107 residential units within Plots 9 and 10, all of which will be provided as affordable housing in accordance with the commitments secured through the outline permission. Given the borough's

housing land supply position and the acute need for affordable housing, the delivery of this phase carries substantial weight in the planning balance and represents a significant public benefit.

- 18.5 The design, scale and appearance of the buildings have been informed by the site's sensitive context, including the relationship with the Grade II listed St Andrew's Church and surrounding residential streets. The Reserved Matters proposals preserve the hierarchy and prominence of the church, maintain appropriate separation distances, and incorporate high-quality materials and façade articulation. Officers are satisfied that the scheme preserves the significance and setting of nearby heritage assets in accordance with the NPPF, London Plan Policy HC1 and Havering Local Plan Policy 28.
- 18.6 The quality of residential accommodation has been fully assessed and is considered to be of a high standard. All dwellings are capable of meeting the nationally described space standards, provide good levels of daylight, outlook and privacy, and benefit from access to private and communal amenity space. The scheme also delivers inclusive and accessible housing in line with Building Regulations Part M and London Plan Policy D7. Officers conclude that the proposals will provide good living conditions for future residents.
- 18.7 The impact of the development on neighbouring amenity has been carefully considered. Detailed daylight and sunlight analysis confirms that the development would not result in unacceptable overshadowing or loss of daylight or sunlight to surrounding properties. The layout and separation distances ensure that overlooking and loss of privacy are avoided, and the proposals are considered compliant with London Plan Policies D3 and D6 and Havering Local Plan Policy 7.
- 18.8 All other material considerations have been assessed, including transport and highways, flood risk and drainage, land contamination, sustainability and energy efficiency, ecology and biodiversity (including statutory Biodiversity Net Gain), trees, air quality and community safety. Officers are satisfied that the detailed proposals are acceptable in each of these respects, either because they are consistent with the assessments undertaken at outline stage or because updated information demonstrates continued compliance with current policy and legislative requirements. Where necessary, matters can be appropriately secured through planning conditions.
- 18.9 Overall, officers conclude that the Reserved Matters proposals accord with the development plan when read as a whole, comply with the approved outline permission and parameter plans, and raise no material planning objections. The development will deliver high-quality affordable housing, enhanced public realm and landscaping, and form an integral part of the ongoing regeneration of the Waterloo Estate. The application is therefore recommended for approval, subject to appropriate planning conditions and all other enabling powers.