



<b>Application Reference:</b>	<b>P1039.19</b>
<b>Location:</b>	<b>90 New Road, Rainham</b>
<b>Ward</b>	<b>South Hornchurch</b>
<b>Description:</b>	<b>Site wide groundworks and construction of 717 residential units (Use Class C3), 1,000sqm (flexible retail/commercial floor space (within Use Classes A1/A2/A3/A4), the creation of new publicly accessible open spaces and pedestrian routes together with associated access, servicing, car parking, cycle parking and landscaping</b>
<b>Case Officer:</b>	<b>William Allwood</b>
<b>Reason for Report to Committee:</b>	<b>The application is a Major proposal supported by an Environmental Statement, and is considered a significant development.</b>

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

- 1.1 The development of the site for residential is acceptable in principle with no policy objection to the redevelopment of this brownfield site.
- 1.2 The application is for the redevelopment of the former Somerfield Depot site to create a predominantly residential development providing 717 residential units, with 1,000sqm (flexible retail/commercial floor space (within Use Classes A1/A2/A3/A4), the creation of new publicly accessible open spaces and pedestrian routes together with associated access, servicing, car parking, cycle parking and landscaping
- 1.3 The application is subject to Environmental Impact Assessment and has been submitted with an Environmental Statement.

- 1.4 The application is submitted as a full application, providing details of the layout, form, scale and the various uses across the proposed development. The proposed density is within policy range and the layout is considered to be satisfactory and capable of providing a high quality development.
- 1.5 The proposed height of the apartment blocks at up to 12 storeys is considered appropriate in context for this part of New Road, which is set to be transformed through the arrival of the station and nearby redevelopments of sites.
- 1.6 Members may recall considering the proposal as part of a pre-application developer presentation to the Strategic Planning Committee on the 10<sup>th</sup> January 2019. At that time, the height of the blocks ranged up to 14 storeys. Further, Members raised a number of issues for clarification, which are addressed in some detail as part of this Report.
- 1.7 Given the location of the site close to the proposed new Beam Park Station to the west of the site and applicable maximum parking standards, the level of parking proposed is considered acceptable.
- 1.8 A significant factor weighing in favour of the proposal is the 41% affordable housing (by habitable room) proposed, meeting the objectives of the Housing Zone, and current and future planning policy.
- 1.9 The recommended conditions would secure future policy compliance by the applicant at the site, and ensure any unacceptable development impacts are mitigated.

## **2. RECOMMENDATION**

- 2.1 That the Committee resolve to GRANT planning permission subject to conditions, to include key matters as set out below:
- 2.2 That the Assistant Head of Planning is delegated authority to negotiate any subsequent legal agreement including that:
- a. Pursuant to Section 16 of the Greater London Council (General Powers) Act 1974, restriction on parking permits
  - b. Controlled Parking Zone contribution sum of £80,304.00 or such other figure as is approved by the Council: Indexed
  - c. Linear Park contribution sum of £221,452.50 or such other figure as approved by the Council: Indexed
  - d. Carbon offset contribution sum of £877,173.00 or such other figure as approved by the Council: Indexed
  - e. A Travel Plan to encourage the use of sustainable modes of transport, including a scheme for submission, implementation, monitoring and review, and setting up the car club with free/ discounted membership for residents.
  - f. Public access routes through the site to the Beam Park development and site to the east, including the over 12's play space; commuted sum to provide/ improve existing place space locally if the Beam Park play space is not delivered
  - g. Bus mitigation strategy contribution of £680,150.00, to be payable to Transport for London by collected by LBH
  - h. To provide training and recruitment scheme for the local workforce during construction period, in accordance with the provisions of Policy 22 of the Submission Havering Local Plan 2016 - 2031
  - i. To provide affordable housing in accordance with a scheme of implementation so that the overall level of affordable housing (by habitable rooms) provided across the sites does not at any time fall below 41% overall. The affordable housing to be minimum 40% London Affordable Rent with up to 60% intermediate
  - j. Affordable Housing Review Mechanisms: early, mid and late stage reviews (any surplus shared 60:40 in favour of London Borough Havering) in accordance with the Mayor of London's Affordable Housing and Viability SPG (2017)
- All contribution sums shall include interest to the due date of expenditure and all contribution sums to be subject to indexation from the date of completion of the Section 106 agreement to the date of receipt by the Council.
  - The Developer/Owner to pay the Council's reasonable legal costs associated with the Legal Agreement prior to the completion of the agreement irrespective of whether the agreement is completed.
  - Payment of the appropriate planning obligations monitoring fee prior to the completion of the agreement.

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

### **Conditions**

1. Full application – commencement in 3-years
2. Accordance with plans
3. Details of Materials
4. Car club management
5. Limited number dwellings occupied until Beam Park Station available
6. Details of commercial units
7. Parking allocation and management plan
8. Details of site levels
9. Technical specification of the venting structures/ gratings
10. Play wall specification
11. Detailed podium and drainage strategy
12. Details of play equipment
13. Inclusive and accessible design
14. Biodiverse green roofs
15. Fall prevention/ structures above vehicular ramps
16. Vehicle ramp conditions
17. Hard and soft landscaping
18. Details of refuse and recycling storage
19. London City Airport birdstrike
20. Details of cycle storage
21. Hours of construction
22. Noise Insulation
23. Noise Insulation (specific)
24. Contamination – site investigation and remediation
25. Contamination – if contamination subsequently discovered
26. Electric charging points
27. Construction methodology
28. Construction Logistics and Deliveries/ Servicing Plan
29. Air Quality – construction machinery
30. Air Quality – demolition/construction dust control
31. Air Quality – internal air quality measures
32. Air Quality – low nitrogen oxide boilers
33. Details of boundary conditions
34. Details of surfacing materials
35. Car parking to be provided and retained
36. Pedestrian visibility splays
37. Vehicle access to be provided
38. Wheel washing facilities during construction
39. Details of drainage strategy, layout and SUDS

40. Details of secure by design
41. Secure by Design accreditation to be obtained
42. Water efficiency
43. Accessible dwellings
44. Archaeological investigation prior to commencement
45. Bat/bird boxes to be provided

### **Informatives**

1. Statement pursuant to Article 31 of the Development Management Procedure Order
  2. Fee for condition submissions
  3. Changes to public highway
  4. Highway legislation
  5. Cycle access to basements
  6. Temporary use of the highway
  7. Surface water management
  8. Community safety
  9. Street naming/numbering
  10. Protected species
  11. Protected species – bats
  12. Crime and disorder
  13. Cadent Gas, Essex and Suffolk Water, Network Rail, and Thames Water comments
  14. Letter boxes
- 2.5 In terms of the Community Infrastructure Levy (CIL), the development will be liable to pay CIL when the development is built. In this regard, the London Mayoral CIL2 charging rate is £25 per sq. m. for all development, and the Havering CIL for this part of Rainham (introduced on the 01<sup>st</sup> September 2019) is £55 per sq. m for residential development.

## **3 PROPOSAL AND LOCATION DETAILS**

### **Proposal**

- 3.1 The application is submitted as a full application and is accompanied by an Environmental Impact Assessment. The development sought is a residential development of 717 residential units within 6 no. separate blocks, and 8no. short terraces of townhouses and maisonettes. The scheme also incorporates a small element of commercial floor space (913 sq. m), with 344 car parking spaces (including visitor, wheelchair accessible and Car Club spaces) and 34 motorcycle spaces, together with 1,251 long stay residential cycle spaces, 19 short stay residential visitor cycle spaces, 6 long stay commercial visitor spaces and 25 short stay commercial visitor spaces.
- 3.2 The proposed residential development mix would be as follows:

<b>Unit Split</b>	<b>Number of Units</b>	<b>% Units</b>
1 Bed 1 Person	38	5.3

1 Bed 2 Person	290	40.4
2 Bed 3 Person	33	4.6
2 Bed 4 Person	288	40.2
3 Bed 4 Person	4	0.6
3 Bed 5 Person	18	2.5
3 Bed 6 Person	46	6.4

Total	717	100
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#### **Floorspace (m<sup>2</sup> GEA)**

Commercial	913
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- 3.3 The scheme is primarily made up of flats; however, there are also 38 houses and 12 maisonettes. Of the entire development, just 9% is considered to be family sized units, which rises to 23% within the affordable tenure. The housing mix is considered appropriate, given the proximity to the train station. The houses and maisonettes are primarily proposed within the east of the site, which is considered appropriate given the distance from the new district centre and the train station.
- 3.4 The proposed scheme is comprised of 6 distinct blocks of flats and 8 short terraces of townhouses and maisonettes, with a lateral east-west link running through the site, named Central Avenue. Mansion-block-style buildings front New Road, with terraced houses behind these blocks, just north of the central avenue. South of the central avenue, it is proposed to create two blocks, a larger M-shaped block with podium gardens between the blocks, and a smaller but taller block, fronting the station square and the Beam Park development's Block K (approved at 16 storeys).
- 3.5 The land to the immediate west of block 1 is currently owned and occupied by RTS Motors as a scrapyard. Whilst the future redevelopment of the RTS site is not within the applicant's control, it is important to ensure that the scheme is designed to respond to both the present condition but also not prejudice any future redevelopment. Acknowledging this, the western facades of block 1, which front the RTS Motor site, are blank, and therefore the Local Planning Authority are satisfied that either the block could be amended later, should the applicant acquire the land, or would enable a standalone scheme to come forward on the plot.
- 3.6 In the southwest of the site, on the eastern side of the tallest element of the scheme, it is proposed to develop a public square, known as the Garden Square.

#### **Site and Surroundings**

- 3.7 The 3.3-hectare site lies south of New Road, north of the C2C railway line and was last used as a Somerfield Depot. Whilst the site is presently bound by industrial land uses to the east and west, it lies in an area undergoing significant change: the land to the immediate west is the Beam Park site,

where, following call in by the Deputy Mayor for Planning, Skills and Regeneration, planning permission for up to 3,000 homes and a new railway station was granted in February 2019 (LBH ref: P1242.17), and there are numerous residential planning permissions pending, or recently determined, along New Road.

- 3.8 The site generally slopes gently down north to south from New Road apart from the section immediately adjacent to New Road where the level difference is more steeply defined.
- 3.9 The site is within the Rainham and Beam Park Housing Zone and within the area covered by the adopted Rainham and Beam Park Planning Framework. The site does not form part of a conservation area, and is not located within the immediate vicinity or setting of any listed buildings. Site constraints that are of material relevance with the works proposed include potentially contaminated land, Health and Safety Zone, Air Quality Management Area, Flood Zone 3 and area of potential archaeological significance.

### **Planning History**

- 3.10 The site has an extant planning permission, granted in 2015, for the redevelopment of the site for 170 sq. m of commercial floor space and 497 residential units (LPA reference P1813.11). The previous Mayor considered a report on the case on 27 August 2014. All of the homes were for private market sale and there were no affordable homes approved under the scheme. A Certificate of Lawfulness of Proposed Use or Development was issued by Havering Borough Council on 21 December 2017, confirming that the 2011 development has been lawfully implemented (LPA ref: E0026.17).

## **4 CONSULTATION RESPONSE**

- 4.1 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.
- 4.2 The following were consulted regarding the application:
- 4.3 London City Airport – No objections, subject to conditions
- 4.4 Environment Agency – No objections, subject to informative
- 4.5 British Pipelines Agency - No objections
- 4.6 Network Rail – No objections, subject to conditions and informative
- 4.7 Essex & Suffolk Water – no objections, subject to Informative
- 4.8 Thames Water – Advice provided about surface water drainage and trade effluent; in relation to sewerage infrastructure capacity, there would not be an objection, subject to Informatives.

- 4.9 Metropolitan Police (Designing Out Crime) – Requested conditions regarding designing out crime
- 4.10 LBH, Environmental Protection (Noise and Vibration) – No objections, subject to necessary mitigation works
- 4.11 LBH, Environmental Protection (Contamination) – No objections, subject to conditions, remediation and necessary mitigation works
- 4.12 LBH, Environmental Protection (Air Quality) – To be reported
- 4.13 LBH Waste and Recycling – Advise that the proposals for refuse storage and collection are acceptable
- 4.14 LBH School Organisation – No objections, subject to appropriate CIL education contributions
- 4.15 LBH Flood & Rivers Management Officer – No objections in principal, subject to the internal roads/ open spaces/ subterranean infrastructure being managed by the applicant in perpetuity
- 4.16 LBH Emergency Planning Officer – strongly recommend the following measures to improve the resilience of the development:
- Flood risk assessment highlighting especially the surface water risk
  - Raising the level of the building by at least 300mm above local levels
  - Waterproof membrane in the ground floor
  - Waterproof plaster and waterproofing to ground floor
  - Electrics from the upstairs down and sockets high up off the ground floor where applicable
  - Non return valves on the sewerage pipes
  - Emergency escape plan for each individual property
  - Air brick covers where applicable
  - Movable flood barriers for entrances
- 4.17 Greater London Archaeological Advisory Service, Historic England – require pre-commencement planning conditions
- 4.18 London Fire Brigade – Confirm that it will be not be necessary to install any additional fire hydrants; the proposals are also acceptable in terms of fire precautionary arrangements
- 4.19 LBH Highways – No objections
- 4.20 Greater London Authority (GLA) – made the following observations:
- Principle of development: The residential-led redevelopment of the under-utilised, allocated site is strongly supported in principle.



- Affordable housing: It is proposed to provide 41%affordable housing by habitable room, comprised of 40% London Affordable Rent and 60% intermediate. Whilst the site was last in industrial use, it has an extant, implemented planning permission for 497 residential units, of which none are affordable. In this regard, it is considered that the 35% threshold for the Fast Track route is suitable and the affordable housing offer is strongly supported. The applicant must, however, confirm the intermediate products proposed.
- Design: The applicant should provide further details on the interfaces with the RTS motor's site and the Beam Park development site. Further refinement of the architecture is encouraged and the applicant should consider opportunities to better integrate the public square into the scheme.
- Energy: The applicant has broadly followed the energy hierarchy in the energy strategy; however, further information is required on all elements of the energy hierarchy to ensure compliance with London Plan and draft London Plan Policy. Further, the applicant should note that, in line with the draft London Plan, CHPs are not encouraged. Should it be evidenced that an off-site heat network is feasible then the applicants must investigate alternatives for the site
- Transport: The development is expected to generate a significant number of bus loads in the peak hours. As such, a payment of £680,150 is required towards bus capacity in the area, which is consistent with what other schemes in the area have been charged. Further information and justification is also required on the car parking design and provision as well as the interaction of the scheme and the proposed Beam Parkway works.

- 4.21 Transport for London (TfL) – advise that car parking, including at the outset for disabled people, should be reduced and a permit free agreement and CPZ contribution secured. Contributions towards the delivery of the Beam park scheme and bus capacity mitigation are also necessary. Grampian conditions are required to ensure that the new Beam park station is open before occupation and that better permeability and walking and cycling routes are delivered. Cycle parking, electric vehicle charging points details need to comply with the draft London Plan; A Delivery Servicing Plan, Construction Logistics Plan and Travel Plan should all be secured
- 4.22 Health and Safety Executive – Do not advise, on safety grounds, against the granting of planning permission

## **5 LOCAL REPRESENTATION**

- 5.1 A total of 836 neighbouring residential and commercial properties were notified about the application and invited to comment. The application has been publicised by way of site notice displayed in the vicinity of the application site. The application has also been publicised in the local press.
- 5.2 The number of representations received from neighbours, local groups etc. in response to notification and publicity of the application were as follows:

No of individual responses: 2 objections

## **Representations**

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

Objections from adjoining land owner to the east:

- The proposed development by reason of its height, design, orientation and proximity to the eastern boundary of the site would seriously prejudice the satisfactory future residential development of the adjoining land to the east which is in their ownership
- It is considered that a development of this scale should be appropriately sited a sufficient distance from the common boundary to provide half the necessary separation distance between residential buildings of this height and orientation
- In addition, greater separation would assist in reducing the noise impact on the new residential development from the current commercial use of the adjoining site, particularly from HGV movements during the early hours of the morning and late in the evening

## **Officer Response**

- The issue of existing industrial noise in proximity to the proposed residential development has been considered at length by the Environmental Protection (Noise) Team of Havering Council. The Noise team have no objections to this full planning application, subject to the imposition of planning conditions
- In terms of the impact of the development upon existing residential and industrial occupiers, the redevelopment of this part of New Road is envisaged in terms of the status of the GLA Rainham and Beam Park Housing Zone in terms of unlocking the delivery of housing and affordable housing.

Objection received from a person of unknown address:

- Overdevelopment of the site due to number of dwellings and height of buildings
- Insufficient family sized units
- Insufficient car parking
- Out of keeping with Rainham Village and conservation area
- Insufficient infrastructure in areas including GP's, dentists and schools

Further, comments received from the Beam Park Partnership to the west:

- The Beam Park Partnership is delivering the consented Beam Park development which directly abuts the above development. We believe that the interface between the two adjacent schemes is critical to the success to the wider regeneration of the area. As such, we are actively collaborating with Clarion Housing Group to ensure a coordinated approach to the detailed public realm design, connecting the consented “Station Approach” to the proposed “Green Avenue”. We are committed to working with Clarion to ensure a comprehensive redevelopment
- We are supportive of the principle of development at 90 New Road, and welcomes proposals from the applicant that tie into the consented Beam park scheme, with the aim of producing a high-quality public realm linking 90 New Road to the Beam Park station and surrounding commercial units

## 6 MATERIAL PLANNING CONSIDERATIONS

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

- Principle of Development
- SPC Feedback/ Design Response
- Density/Site Layout
- Design/Impact on Street/Garden Scene
- Impact on Amenity
- Highway/Parking
- Affordable Housing/Mix
- School Places and Other Contributions

### **Principal of Development**

6.2 In terms of national planning policies, the National Planning Policy Framework 2019 (NPPF) sets out the overarching roles that the planning system ought to play, including a set of core land-use planning principles that should underpin decision-taking, one of those principles being:

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

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

6.3 Policies within the London Plan seek to increase and optimise housing in London, in particular Policy 3.3 on ‘Increasing Housing Supply’ and Policy 3.4 on ‘Optimising Housing Potential’.

- 6.4 Policy CP1 of the LDF on 'Housing Supply' expresses the need for a minimum of 535 new homes to be built in Havering each year through prioritising the development of brownfield land and ensuring it is used efficiently. Table 3.1 of the London Plan supersedes the above target and increases it to a minimum ten year target for Havering (2015-2025) of 11,701 new homes or 1,170 new homes each year. Policy 3 in the draft Havering Local Plan sets a target of delivering 17,550 homes over the 15 year plan period, with 3,000 homes in the Beam Park area. Ensuring an adequate housing supply to meet local and sub-regional housing need is important in making Havering a place where people want to live and where local people are able to stay and prosper.
- 6.5 The aspiration for a residential-led redevelopment of the Rainham and Beam Park area was established when the area was designated a Housing Zone by the GLA. Furthermore the production of the Planning Framework sought to re-affirm this and outlines potential parameters for development coming forward across the area with the aim of ensuring certain headline objectives are delivered. The 'Rainham and Beam Park Planning Framework' 2016 supports new residential developments at key sites, including along the A1306, and the Housing Zones in Rainham and Beam Park. Further, the application site is located within the London Riverside Opportunity Area Planning Framework Adopted September 2015 supports residential development. Therefore the existing business uses are not protected by planning policy in this instance.
- 6.6 In view of the above, the Local Planning Authority raise no in principle objection to a residential-led development coming forward on this site forming part of a development of sites north and south of New Road, in accordance with the policies cited above.

#### **Strategic Planning Committee (SPC) Feedback/ Design Response from Developer**

- 6.7 Members of the SPC may recall providing feedback to the scheme at 49 – 87 New Road, Rainham at their meeting of the 10<sup>th</sup> January 2019. In this regard, the report will set out the individual comments made, followed by the response of the developers:

##### SPC Feedback 1

*Assurances were sought regarding the build quality of the units*

##### Developer Response 1

Clarion have worked with Hill (Large and Medium Housebuilder of the Year 2018) throughout the design process. Hill will be responsible for constructing the new homes proposed.

##### SPC Feedback 2

*Detail is sought on why the extant scheme is being changed*

## Developer Response 2

Responding to funding for train station, approved Countryside and L&Q proposals for Beam Park, ensuring that the new homes comply with the Mayor's Housing Design Standards and help to meet increased strategic and local housing needs (including affordable)

## SPC Feedback 3

*Further detail is sought on how the scheme responds to the Rainham and Beam Park Planning Framework and where it is contrary, what the justification is for that?*

## Developer Response 3

Site Allocation Policy SSA12 advocates residential led development of the Site. The Vision in the Rainham and Beam Park Planning Framework (January 2016) seeks to ensure that the regeneration area:

- Delivers much needed housing to meet local needs and the strategic needs of London;
- Results in a new green residential neighbourhood;
- Has an urban centre structured around the new train station and integrates with the surrounding residential neighbourhoods; and
- Creates a new community and place to live for;
  - a) Working families looking for homes in which to settle and grow;
  - b) Young professionals looking to buy their first home and benefit from the rapid links to the City; and
  - c) Rainham and South Hornchurch residents needing affordable homes and wishing to stay in the area
- The principle of residential development on the Site has also been established by the extant Planning Permission for the Site (LPA Ref: P1813.11 dated 28<sup>th</sup> January 2015). The Applicant is a Registered Provider and has redesigned the scheme to respond to the Beam Park scheme, whilst also maximising the amount of market and affordable housing that can be delivered on the Site.

## SPC Feedback 4

*Heights proposed and the justification for this relative to the Framework*

## Developer Response 4

As previously highlighted, we have worked with Officers to amend the design of the scheme and the maximum has been reduced from 14 to 12 storeys

#### SPC Feedback 5

*The low amount of family housing relative to the Framework and what was achieved on the adjoining Beam park site*

#### Developer Response 5

Policy 2.13 and 7.7 in the London Plan (2016) seek to optimise residential output and densities, particularly in areas benefitting from improvements in public transport accessibility

For clarity, the Rainham and Beam Park Planning Framework (January 2016) is not part of the Development Plan. It is a material consideration that has the same weight in the determination process as the other material considerations set out above. LBH has a track record of under delivering new market and affordable homes to address local and strategic housing needs. The proposed development would help the Council meet their minimum housing needs which would be in accordance with national, regional and local planning policy.

Therefore, we consider some departures from the non-statutory guidance within the Rainham and Beam Park Planning Framework (January 2016) are justified, particularly following the approval of the Beam Park development directly to the west of our Site and the approved urban context and character.

Policy 3.8 and 3.9 in the London Plan (2016) seeks to ensure that Londoners have access to a wide choice of homes that they can afford and which meet their requirements for homes of different sizes and types. The Mayor of London requires new developments to offer a mix of housing sizes and types. The Mayor's Housing SPG (March 2016) acknowledges that local housing requirements should not be the single determinant of housing mix sought on individual developments. Boroughs should have regard to housing needs beyond their own boundaries when setting their affordable housing policies and determining planning applications.

The SPG highlights that "higher density development close to public transport facilities is especially suitable for one and two person households, particularly singles, couples and sharers, students and older people. Conversely, a lower proportion of family sized homes may be appropriate in town centres, as opportunities for play and other amenity spaces tend to be more constrained in these locations. Boroughs should consider applying local policies on unit size mix flexibly in town centre and edge of centre sites where there is good accessibility, recognising the particular suitability of these locations for 1 and 2 bedroom units."

Section 3.3 in the London Riverside OAPF (September 2015) states that “whilst low density family housing is common to London Riverside and will continue to form the large majority of new housing, a variety of housing typologies will be needed in order to achieve a mixed and balanced community. Higher densities, small units and other forms of housing including senior living and less traditional forms of affordable housing, have the potential to diversify the housing offer.” As highlighted below, the OAPF identifies the area around the new train station as a high density location.

Draft London Plan Policy H12 states that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes.

LBH Core Strategy and Development Control (2008) Policy CP2 and DC2 aims to ensure that the sizes, types and tenures of new housing meet the need of new and existing households at local and sub-regional level. The sizes and types of new housing should be of a density and design that is related to a site’s access to current and future public transport and are compatible with the prevailing character of the surrounding area.

#### SPC Feedback 6

*Who would manage the affordable housing units? Is grant available?*

#### Developer Response 6

Grant is available and has been secured to ensure that the maximum amount of affordable housing can be delivered. Clarion Housing Group will manage the scheme in perpetuity.

#### SPC Feedback 7

*Details on the allocation policy for the affordable units are sought. Preference is for Havering residents first.*

#### Developer Response 7

Clarion Housing Group will manage the Site in perpetuity and will work with LBH to allocate the affordable rent units in the future.

#### SPC Feedback 8

*Sustainability credentials and environmental standards to be employed*

#### Developer Response 8

A Sustainable Design & Construction Statement and Energy Assessment has been submitted in support of this application. The non-residential units have been designed to achieve BREEAM ‘Very Good’. The proposed residential units would achieve zero carbon compliance based on the following measures:

- Building fabric enhancements;
- Combined heat and power plant;
- Air Source Heat Pumps; and
- Via a carbon offset payment.

The Energy Strategy targets as a minimum 35% reduction in CO2 emissions beyond Building Regulations 2013. The Proposed Development would achieve a 35% reduction in CO2 emissions. However, to deliver zero carbon homes, the remaining carbon emissions would need to be covered by a carbon offset payment of £877,173.

The proposed development will also:

- minimise risks of pollution, effectively manage waste streams and maximise reuse and recycling;
- provide substantial green infrastructure therefore helping to reduce the urban heat island effect;
- promote ecology and biodiversity;
- encourage cycling and sustainable transport measures; and
- help to manage water at source.

The daylight and sunlight assessment submitted with the planning application demonstrates that overall 77% of the habitable rooms meet the BRE targets. There are some living, dining and kitchen spaces (LDK) that do not meet the 2% BRE target for kitchens but will still receive a good daylight level. 82% of LDKs across all proposed blocks will achieve ADF values of 1.5% or above. Whilst balconies are required to provide private amenity space, if they were omitted then the compliance rate would increase to 88%.

The daylight and sunlight assessment for surrounding properties within the Environmental Statement concludes that there are some isolated windows and rooms which will experience alterations to their levels of daylight and sunlight amenity which are, in percentage of baseline terms, moderate/major adverse in nature, the retained daylight and sunlight amenity levels to the majority these rooms will remain acceptable considering the intended urban environment for the development area.

It is considered that the Proposed Development would result in acceptable and sufficient levels of daylight and sunlight experienced by dwellings within the Proposed Development and dwellings surrounding the Proposed Development in accordance with the adopted Development Plan. The vast majority of windows assessed comply with the BRE Guidelines, however as acknowledged above the policy framework recognises the need for flexibility and the need to take account of site specific circumstances, whilst avoiding unacceptable harm but fully optimising housing potential on large sites.

With regards to overshadowing the effects of the Proposed Development are not material and there will be negligible impact on surrounding properties. In relation to overshadowing of the public spaces within the scheme, 5 out of the 7 spaces meet the BRE recommended 50% of 2 hours of sun on March 21st,



with the other two spaces being slightly short of this standard at 45.4% and 46.6%. However, on June 21st, all spaces will comfortably achieve 2 hours of sun to over 50% of their areas.

A wind Microclimate assessment has been undertaken and is included within the submitted Environmental Statement. The assessment concludes that the ground level wind microclimate for the Development is expected to range from acceptable for standing use through to strolling use, which are the required conditions for comfortable pedestrian thoroughfare use.

#### SPC Feedback 9

*Waste disposal: the applicant is invited to approach that innovatively*

#### Developer Response 9

Details of the proposed refuse collection strategy are outlined within the submitted design and access statement. In this regard, the refuse collection strategy has been designed in accordance with LBH's Waste Management Practice Planning Guidance. Refuse vehicle access to the site is provided from New Road. Refuse vehicles can stop within 10m of the entrance to most of communal refuse stores within the development. Where refuse stores are located more than 10m away from the road, refuse will be moved by management personnel to designated collection points. Access will be provided to the pedestrianised portion of the Central Avenue, by site management, to allow the refuse vehicle to collect from blocks 1 and 6 and turn around. Residents of houses will have a dedicated bin store at the front of the property. For commercial units, refuse is collected along the same route as residential however, the commercial businesses are responsible for any management relating to their refuse collection.

#### SPC Feedback 10

*What opportunities are there to improve north-south connections on the back of the scheme?*

#### Developer Response 10

We appreciate this is a strategic priority for the Council and contributions towards bus capacity Improvements are included within the proposed Heads of Terms.

#### SPC Feedback 11

*Whether any parking space will be available for commuters and other station visitors*

#### Developer Response 11

The submitted planning application includes some visitor car parking provision.

#### SPC Feedback 12

*Need to understand the parking management strategy that will be used nearby to the station to prevent commuter parking if no commuter provision is made*

#### Developer Response 12

A Controlled Parking Zone is proposed for the area surrounding the new train station to prevent commuter and visitor parking.

#### SPC Feedback 13

*Further detail on estate management*

#### Developer Response 13

Clarion Housing Group will manage the Site in perpetuity.

#### SPC Feedback 14

*Design of the highway, how it works in practice to avoid vehicle and pedestrian conflict, particularly for those with a visual impairment*

#### Developer Response 13

Details of the highway design are included within the submitted Transport Assessment.

### **Density/Site Layout**

- 6.8 The proposal is to provide for the redevelopment of the site to provide 717 residential units and 913 sq. m of flexible retail/commercial floor space, as well as the creation of new publicly accessible open spaces and pedestrian routes together with associated access, servicing, car parking, cycle parking and landscaping, on a site of 3.53 hectares situated the south of New road, and north of the C2C railway line and was last used as a Somerfield Depot. The density of the site would be 203 dwellings per hectare. The site is an area with low-moderate accessibility with a PTAL of 2, which will improve to PTAL 3 following the delivery of the Beam Park Station. Policy SSA12 of the LDF specifies a density range of 30-150 units per hectare; the London Plan density matrix suggests a density of 45-170 units per hectare in an urban context with a PTAL of 2-3 (suggesting higher densities within 800m of a district centre or a mix of different uses). The Rainham and Beam Park Planning Framework suggest a density of between 100-120 dwellings per hectare.

- 6.9 The proposed density is higher than the GLA's guidance range and requires careful consideration. It should be recognised that when determining an application, density is only one of a number of considerations and the density matrix should not be applied mechanistically. Priority considerations would be on the quality and design of the scheme, the local context and the relationship with surrounding areas when determining whether a scheme is acceptable. It is considered that in this case there is a justification for a high density development due to its location within the Opportunity Area and close proximity to the Beam Park Centre and new station to the west. Officers are supportive of the approach to developing this site with a maximum 12 storey building height, which develops a coherent strategy with adjoining sites along the south side of New Road, and the taller building at 16 storey to the west at Beam Park. The proposed scheme is comprised of 6 distinct blocks of flats and 8 short terraces of townhouses and maisonettes, with a lateral east-west link running through the site, named Central Avenue. Mansion-block-style buildings front New Road, with terraced houses behind these blocks, just north of the Central Avenue. South of the Central Avenue, it is proposed to create two blocks, a larger M-shaped block with podium gardens between the blocks, and a smaller but taller block, fronting the station square and the Beam Park development's Block K. In the southwest of the site, on the eastern side of the tallest element of the scheme, it is proposed to develop a public square, known as the Garden Square.
- 6.10 The proposed layout of the buildings and spaces seeks to create a coherent and connected grid that guides people towards the new local centre via the urban form and the hierarchy of routes across the site and wider Housing Zone. The proposed layout enables active frontages to be created across the development via the location of the non-residential uses and the domestic scale houses with front doors onto the streets coupled with the entrances to the flats. The layout and design of the Proposed Development has responded to the guidance within the London Riverside Opportunity Area Planning Framework (September 2015) and the Rainham and Beam Park Planning Framework (January 2016) by:
- Providing active frontages throughout the proposed neighbourhood;
  - Creating a layout with a strategic east to west pedestrian and cycle way link and secondary north to south green links;
  - Ensuring that the greatest height and scale of development is located within the new Beam Park Centre character area;
  - Produce a high quality, active and vibrant environment and street level throughout the development that includes street trees, SuDS and children's play spaces; and
  - Creates a new natural habitat along the southern edge of the Site.
- 6.11 The general layout plan of the proposed buildings would fall in accordance with Policy DC61 of the London Borough of Havering LDF 20087 and the LB of Havering Residential Design Supplementary Planning Document 2010. Further, these proposals are consistent with the implementation of Policies

### **Design/Impact on Street/Garden Scene.**

- 6.12 Demolition of the buildings originally on the site has already taken place. None of the buildings that were demolished held any architectural or historical value, therefore no principle objection was raised to their demolition.
- 6.13 The height of the proposed development would range from 2 to 12 storeys high. The 12 storey building (Block 6) would be located next to the new train station, within the new local town centre and on the north eastern corner of the garden square. Whilst there are no conservation areas, listed buildings or strategic/local viewing corridors affecting the Site, the taller buildings proposed have been positioned along the southern edge of the Site next to the railway and are at least 100m from the nearest residential properties to the north of the Site.
- 6.14 The height onto New Road would predominantly be 6 storeys and broadly in accordance with the heights approved as part of the extant planning permission and other permissions along the northern side of New Road that have recently been approved. The 7/8 storey Block (Block 1) on the western edge of the proposed development would help to frame the primary access from New Road into the new local centre and Station Square within Beam Park Centre.
- 6.15 The proposed development has been designed to have 4 distinctive character areas with the following design features:

- Civic Centre

The Civic Centre is characterised with predominantly buff brick and bronze materials. This is aside from Block 06 Core A, which serves the Garden Square and Block 01 Core A, which serves as the entrance block to Station Approach. This area forms the culmination of the other three character areas, as well as relating to the Beam Park proposal, hence it includes a combination of balcony types and details.

- New Road Frontage

The Blocks along the front of New Road communicate with the opposing future proposals and residential areas. The three building are brown brick with

bronze panelling, thick contrasting banding and semi-inset balconies. The mansion block aesthetic is accentuated through the detailing.

- Residential Core

The Houses are located in the centre of the site and contrast with the surrounding flat blocks, using light buff brick, limited detailing and grey-beige materiality. The character area aims to echo the existing residential streets to the North.

- Railway Edge

This area forms a barrier between the site and the railway, and is characterised with predominantly extruding balconies and buff brick flat blocks in increasing heights.

### **Quality Review Panel Comments**

- 6.16 As part of the pre-application discussions, the proposals were presented to the London Borough of Havering's independent Quality Review Panel on the 10<sup>th</sup> December 2018, and set out below are the issues raised by the QRP and the developer response:

#### Overall approach

##### QRP Comment

*Given the size and significance of the scheme, it should have been brought to review at an earlier stage.*

##### Developer Response

The Quality Review Panel was formed in November 2018 and was subsequently not available prior to this review. The applicant had undertaken a number of pre-application meetings with the Council and the GLA prior to the QRP which covered urban design. It should also be noted that the applicant has held design workshops with officers following the QRP meeting to positively respond to the comments raised.

##### QRP Comment

*There's a low provision of 3-bed, family units. The residential mix should be re-balanced.*

##### Developer Response

3 Bed homes provision was circa 7.3% at the QRP meeting and we have subsequently increased this to 9.5%. Within the affordable rented tenure, where the demand is highest, 39.7% of the homes are 3 bed+. In keeping with the Housing Zone status of the area, the proximity of the new train station

and the civic centre location and commitment to achieving the delivery of significant amounts of much-needed affordable housing, we consider that the mix of residential units will cater for working families, young professionals and deliver genuinely affordable homes. As covered elsewhere within the Committee Report, the scheme has a substantial viability deficit and the private mix and ability for the applicant to sell homes is helping to subsidise the proposed affordable housing provision.

#### Massing and development density

##### QRP Comment

*The interface between the scheme and Beam Park to the west lacks clarity – when it is essential the two developments work together to frame a high quality Station Approach.*

##### Developer Response

The proposals have been designed to work together and support Station Approach. They enclose the space and provide active uses at ground floor. Station Approach is made up of three different land ownerships. The design team have consulted with the other stake holders, Countryside Properties, LBH and TFL to help develop a unified approach and create a high-quality local centre where the Avenue, Station Square and Station Approach align. It is worth noting that Countryside are a Strategic Partner of Clarion and they have confirmed that they are collaborating with us on the design of Station Approach. Clarion have also agreed to purchase the RTS Motors Site to ensure the delivery of a seamless high-quality space leading to the new Beam Park Station. The Council's Urban Design Officer has also scrutinised the interface proposed between the two sites and is happy with the design proposals.

##### QRP Comment

*The tall building adjacent to the station is problematic, because it's siting fractures the route between the development and the station, and it has an awkward relationship with a tall building of similar height in Beam Park.*

##### Developer Response

We have proactively worked with Officers to reduce the maximum height from 14 to 12 storeys and repositioned the greatest massing on our scheme to enhance views and develop the relationship with the landmark building within Phase 1 of Beam Park. Acting together, they form a gateway to the Station. It also acts as an axis point for the three public spaces, Station Approach, Station Square and Garden Square. OFFICER COMMENT:- When presented to QRP, the proposal was for a 14 storey building situated adjacent to the 16 storey building proposed for the Beam Park site. Following the QRP, the applicant has repositioned the block, creating a

wider approach to Station Approach, and reduced the height of the building by 2 storeys.

#### QRP Comment

*A more consistent height along New Road could create a simpler and more coherent edge to the street.*

#### Developer Response

We've made amendments to create a consistent height onto the majority of New Road. The buildings do rise in the Civic Centre to identify the entrance to Station Approach. The Council's Urban Design Officer has scrutinised the height proposed onto New Road and is happy with the proposals.

#### Scheme Layout

#### QRP Comment

*The character and function of the public space around the Station Approach is still unresolved.*

#### Developer Response

We've worked with all parties involved to enhance Station Approach and create a high quality landscaped entrance to the local centre and station. We will continue to work with the Council, Countryside, GLA and TfL to ensure this is delivered. The buildings have been designed to positively address the public realm along Station Approach and provide activity at ground floor level. We have also agreed terms to purchase the Scrapyard Site to help create a seamless high quality entrance to the Station.

#### QRP Comment

*A bus-turning point would be a disappointing and unconvincing entrance to a significant piece of townscape.*

#### Developer Response

We have amended the design proposals and subsequently omitted the bus turning area.

#### QRP Comment

*The location of the main public green space should be reviewed as it currently opens up to a view of the large industrial building across the railway lines.*

#### Developer Response

The Garden Square has been located to complement Station Approach and Station Square. The other spaces are based around transport interchange and retail offerings while the Garden Square will offer a south facing green space intended for rest and play, significantly different to that on offer by the other

two spaces. It is located on the Central Avenue within the densest portion of the site to allow the maximum number of residents to benefit from the public greenspace. Trees would screen views of the industrial building which is approximately 70m away on the other side of the railway line.

QRP Comment

*The scheme lacks a clear hierarchy of streets and public space. In particular, the Central Avenue is not strong enough.*

Developer Response

The proposals have been designed with a clear street hierarchy. The meandering landscape is designed to emphasise the pedestrian nature of the Central Avenue and create a series of differing green spaces that would act as events along its route.

QRP Comment

*The connection between Central Avenue and the station is unclear and circuitous, being obstructed by the proposed 14 storey building.*

Developer Response

The 14 storey building has been reduced to 12 storeys and the massing relocated to create a better interface with the Central Avenue, Station Approach and Station. In particular, Block 6 has been stepped back to open up Central Avenue as it meets Station Approach. These amendments were subject to workshops with planning and urban design officers prior to submission of the planning application.

QRP Comment

*Pedestrian and cycle routes are fragmented, with many crossing points, with the potential to create conflict and hazards.*

Developer Response

The proposals are designed to be pedestrian focused with vehicular routes degraded where possible. The Central Avenue has been redesigned with officers following the QRP to ensure pedestrians and cyclists are welcomed within the site. The western portion of the Central Avenue is pedestrianised to further welcome pedestrians into the site from the station.

QRP Comment

*The alignment of the north-south streets do not appear to relate to existing streets to the north of New Road or to the buildings to the south of the central avenue.*



#### Developer Response

The proposed connections onto New Road have been designed to work with the existing and proposed crossing points. They have come about following discussions with both TFL and LBH, and to take account of the Council's aspirations for Beam Parkway.

#### QRP Comment

*Consider introducing more active non-residential uses at street level, including along Central Avenue.*

#### Developer Response

The proposals have been designed to ensure that the ground floor uses activate the streets and public spaces they address. 1,000m<sup>2</sup> of commercial spaces are positioned around Station Approach and Central Avenue to help promote a vibrant Local Centre and encourage people into the development. These spaces are designated as use classes A1-A4 to provide flexibility and ensure the proposals complement the facilities included within the approved Beam Park. Block 6 has subsequently been redesigned since the QRP with active uses on the ground floor level to further extend commercial activity along the Central Avenue.

#### Architectural Expression

#### QRP Comment

*The architecture is generic, repetitive and placeless, missing the opportunity to respond to the Havering context.*

#### Developer Response

The proposals have been developed through discussions with planning and urban design officers to sit comfortably alongside the emerging Beam Park and the existing context to create a place that is firmly rooted in its surroundings. The identity of the proposals is further developed through four distinct character areas, each responding to their surrounding context to create architectural variety within the proposals. The result is a proposal that positively responds to the local context by creating a new characterful area that is well connected to its surroundings.

#### QRP Comment

*The mansion blocks to which the current designs refer, are not a feature of Havering. Bring the specific character of the area into the proposal.*

#### Developer Response

The mansion block is a successful form of flatted housing that the proposals draw upon for reference. Although the design references mansion blocks in its

architectural character, the existing and forthcoming local character has also influenced the design and generated a response to the context while creating a specific architecture for Beam Park. A series of character areas aid variety and legibility within the proposals, responding to their location on the site. The Civic Centre is influenced by the adjacent Beam Park to help create a unified approach to the new local centre. The New Road Frontage and Residential core takes a more traditional form to address the existing houses to the north.

#### QRP Comment

*The entrances to the blocks are not generous enough, particularly along the southern side of Central Avenue*

#### Developer Response

The entrances have been developed through discussions with the Officers and subsequently increased in size where possible. They have been designed to be prominent and legible and are positioned to enable people to navigate and orientate themselves easily.

#### Landscaping

#### QRP Comment

*The landscape design of the scheme presents an important opportunity to create a characterful place.*

#### Developer Response

The landscape design has been substantially reviewed following the QRP and consists of a new Green Avenue, green interface onto New Road, new public spaces, play spaces, semi-private courtyards and gardens, as well as an ecology corridor along the southern boundary of the Site. These spaces will help to create a characterful new green neighbourhood.

#### QRP Comment

*Producing sections through the site, extending beyond the boundaries, and physical models will be essential to explore and explain layout and massing*

#### Developer Response

The design team will continue to develop drawings to best present the proposals in their context

#### **Impact on Amenity**

- 6.17 The distances to neighbouring properties all far exceed recommended minimum separation distances with the closest distance to north side of New Road. This indicates that there will be no impact on the privacy of existing residences. The layouts of the flats and the distances between the blocks within the development have been designed to maximise on privacy and avoid overlooking issues.

- 6.18 The proposed residential units have been designed to comply with the National Minimum Internal Space Standards and the Mayor of London's Housing Design Standards as set out in the Housing Supplementary Planning Guidance (March 2016). 90% of the proposed units comply with Building Regulation M4 (2) for accessible and adaptable dwellings, and 10% comply with Building Regulation M4 (3) for wheelchair user dwellings.
- 6.19 Officers have further reviewed the external space provided with the proposed development, and the revised plans show both private and communal amenity space for its occupants which appear to be sufficient and in accordance with the Residential Design Supplementary Planning Document Policy PG20 on Housing Design, Amenity and Privacy in the Rainham and Beam Park Planning Framework. The main landscape character areas proposed are:
- The creation of a main central route (Central Avenue) that acts as the pedestrian artery, connects the entire development and directs the residents and users to the future station. The Avenue will include provision for seating, play and planting;
  - Creation of a public destination point with the Garden Square;
  - Creation of semi-private courtyards for residents use;
  - North / South streets that link to New Road;
  - An ecology corridor to the South defines the boundary to the train line. This will provide a strong ecological asset for biodiversity.
- 6.20 The application seeks to deliver a high quality public (Garden square, Plaza, Station Approach, the Avenue and Internal Roads) and semi-private (Podiums, Courtyards and the Mews) landscape spaces of varying scale and identity that punctuate the street scene and key movement routes. The primary access route through the site would be via the Green Avenue that runs from east to west between the proposed buildings, and circa 15% of the site would be provided as public realm or open space. The proposed landscape design creates 2,253 sq. m of playable space for under 5's and 5 - 11 ages in the communal amenity spaces, exceeding the minimum requirement set out in the GLA play space calculator; the over 12's play spaces is located off-site to the west less within the than 5 minutes' walk away from the site within the Beam Park development. Details of effective and affordable landscape management and maintenance regime will be secured through planning condition. Further, and from a crime design perspective, the proposal would present a layout that offers good natural surveillance to all public and private open space areas. The proposal would accord Policy 3.5 of the London Plan on Quality and Design of Housing Developments and Policy 7.1 on Lifetime neighbourhoods and Policy 7.3 on Designing Out Crime, as well as Policy DC63 of the LDF on Delivering Safer Places.
- 6.21 From a noise and disturbance perspective, the applicant has submitted a Noise Assessment, Contamination and Air Quality reports which reaffirms that both residents from within and outside the proposal would not be affected by unacceptable levels of noise or air pollution arising from the development. The Councils Public Protection Officers have reviewed the submitted reports

and concluded that the scheme (subject to conditions imposed) would be compliant with Policy DC52 on Air Quality, Policy DC55 on Noise and CP15 on Contaminated Land, subject to the introduction of appropriate planning conditions.

- 6.22 The LPA have reviewed the proposed waste storage areas catering the apartments, which have been set to be serviced via New Road and the internal service road. As it stands, there are no overriding concerns with this arrangement as scheme demonstrates a convenient, safe and accessible solution to waste collection in keeping to guidance within Policy DC40 of the LDF on Waste Recycling.

### **Highway/Parking**

- 6.23 The application site within an area with PTAL of 2 (low-moderate accessibility). The total quantum of car parking has reduced to a ratio of 1:0.47, resulting in 344 car parking spaces, with consideration given to the site proximity to the new Beam Park railway station; 10% of the car parking spaces will be wheelchair accessible, which is in accordance with the provisions of London Plan. The Planning Framework also expects the delivery of car sharing or car club provision. The maximum standards suggested in the Rainham and Beam Park Planning Framework (which is based on the London Plan) for a development of this indicative mix would be 588 spaces. Notwithstanding this, the LPA has to be mindful that the site would be located close to the proposed Beam Park station and accessibility levels would consequently increase.
- 6.24 The Council is seeking to implement a CPZ in the vicinity of the proposed development sites. The applicant has therefore developed an approach to car parking provision and management on the assumption that the proposed developments will need to be “self-sufficient” in respect of its car parking provision and it is envisaged that residents occupying the developments (save for blue badge holders) will not be eligible to apply for car parking permits within the CPZ.
- 6.25 In terms of the allocation of car parking spaces, the applicant will implement a car parking management strategy which will in the first instance seek to allocate car parking spaces proportionate to the tenure split on a percentage basis.
- 6.26 In terms of affordable rent units, car parking spaces allocated to affordable units will be located in the proximity of these units and be specifically allocated for use by this tenure. These car parking spaces will however not be attached to a specific property to allow flexibility over the life of the development. The Registered Providers Housing officer will allocate car parking spaces to individual families housed within the affordable units according to need. These spaces can also be swapped if needed by prior agreement with the Housing Officer.

- 6.27 As a general rule, the car parking spaces provided for shared ownership and private sale tenures will be allocated to 3 bed units first and cascaded down. In some circumstances, car parking may be allocated to specific 1 or 2 bedroom units based on sales consultant advice. Units will be sold together with a specific car parking space (exclusive right to use) and the allocated space confirmed in the corresponding unit lease.
- 6.28 This approach facilitates management as well as provides transparency for the buyers at the outset. If someone sells their flat and they had a car parking space it will be included in the sale of the unit.
- 6.29 Further, and as advised, the applicant is seeking to encourage the provision of a car club. Car clubs are a mode of transport which complements the public transport upgrades being proposed for the local area. Car clubs are attractive to buyers and tenants as their property comes with access to a car without the high purchase and running costs. In addition, car clubs contribute towards reducing congestion and encourage a sustainable and economical alternative to car ownership. The applicant proposes to provide each new household forming part of the development with 1 year free membership plus £50 driving credit. In addition, it is proposed to provide 20% of the spaces for charging for electric cars and a further 20% will be passive provision.
- 6.30 Accordingly, and on the basis of a robust car parking management strategy, the LPA are content with the provision of parking proposed considering the 344 spaces. This element from the proposal adheres to London Plan Policy 6.13 Parking, and Policy DC33 Car Parking of the LDF.
- 6.31 The applicant has submitted a Transport Assessment as part of this application and the Highways Authority have reviewed the document and consider the development acceptable from a highway perspective and unlikely to give rise to undue highway safety or efficiency implications in accordance with Policy DC32 The Road Network of the LDF.
- 6.32 The Council's Highways Engineer has further reviewed all other highways related matters such as access and parking and raises no objections subject to the imposition of conditions (covering pedestrian visibility, vehicle access and vehicle cleansing during construction), financial contribution to Controlled Parking Zone and limitation on future occupiers from obtaining any permits in any future zone.
- 6.33 The London Fire Brigade has raised no objection in principle.

### **Affordable Housing/Market Mix**

- 6.34 Policy DC6 of the LDF and Policies 3.9, 3.11 and 3.12 of the London Plan seek to maximise affordable housing in major development proposals. The Mayor of London Supplementary Planning Guidance "Homes for Londoners" sets out that where developments propose 35% or more of the development to be affordable at an agreed tenure split, then the viability of the development

need not be tested – in effect it is accepted that 35% or more is the maximum that can be achieved.

6.35 In this respect, the proposal is intended to provide 40.1% affordable housing across all sites that the applicant is looking to develop along New Road. Officers have sought a viability appraisal from the applicant which has been reviewed independently. The review concludes that the scheme, based on present day inputs, could not viably support a policy compliant affordable housing position; however, the developer is willing to deliver a greater level of affordable housing that can viably be justified based upon its unique nature as an applicant (a Registered Provider) and its appetite to maximise the delivery of affordable housing in accordance with Local Plan and the Mayors policy aspirations to increase the delivery of affordable housing. The applicant has therefore redesigned the scheme, secured affordable housing grant, allocated internal subsidy towards the scheme and are willing to except sub market returns in order to increase the amount of affordable housing that can be delivered on the site. In this respect, affordable housing provision is being maximised, meeting the objectives of existing policy and future policy in the submitted local plan and draft London Plan, as well as the stated ambitions of the Housing Zones and therefore weighs in favour of the proposal.

6.36 Policy DC2 of the LDF on Housing Mix and Density specifies an indicative mix for market housing, this being 24% 1 bed units, 41% 2 bedroom units, and 34% 3 bed units. The Rainham and Beam Park Planning Framework 2016 indicates that 50% of the homes should be 1 and 2 bed units, with 50% 3-bedroom and over. The draft London Plan identifies an overall mix of 55% 1 bedroom units, 16% 2-bed, and 29% 3 bedrooms and over.

6.37 The London Borough of Havering Proposed Submission Local Plan 2016 – 2031 identifies the following market and affordable housing mix:

	1 bed	2 bed	3 bed	4+ bed
Market Housing	5%	15%	64%	16%
Affordable Housing	10%	40%	40%	10%

6.38 The proposal at 90 New Road, Rainham incorporates an indicative *overall* tenure mix of 45.7% 1 bed units, 44.8% 2 bed units, and 9.5% 3 bed units. In terms of the proposed private sale mix, the scheme identifies the following:

Private Sale Accommodation Mix		
Unit Size	No's	Percentage
1 bed 1 person	37	7.96%
1 bed 2 person	181	38.92%
2 bed 3 person	20	4.3%
2 bed 4 person	216	46.45%
3 bed 6 person	11	2.37%
Totals	465	100%

rms of the proposed affordable housing mix and tenure, the scheme identifies the following:

	Affordable Rent	Shared Ownership
1 bed 1 person		1 (0.7%)
1 bed 2 person	47 (46.5%)	65 (41.1%)
2 bed 3 person		13 (8.6%)
2 bed 4 person	14 (13.9%)	58 (38.4%)
3 bed 4 person	4 (4%)	0
3 bed 4 person	11 (10.9%)	7 (4.6%)
3 bed 4 person	25(24.8%)	10 (6.6%)
Total	101 (100%)	151 (100%)

6.40 Whilst the provision of market 3-bedroom family accommodation does not align with the current and emerging Policy requirement, the following does weigh in favour when considering mix:

- High level of affordable provision (any increase in larger family market units would result in fall in affordable provision)
- Nature of development close to a new district centre and station where a greater concentration of smaller units may be expected
- Flood risk meaning that there is less scope for ground floor accommodation which is more suited to family accommodation

6.41 It is also important to identify that the previously approved planning application include 0% affordable housing provision (LPA ref; P1813.11), and this application has been lawfully implemented.

### **Drainage and Flood Risk**

6.42 The proposal is for residential use within Flood Zone 2/3 as defined by the Environment Agency, and the National Planning Policy Framework 2019 therefore advises that the Exceptions Test is required in addition to the Sequential Test. In order for the proposal to be acceptable, it must be demonstrated that the development would provide wider sustainability benefits, and a site specific Flood Risk Assessment must demonstrate that the development will be safe for its lifetime, without increasing flood risk elsewhere.

6.43 In terms of the wider sustainability benefits, the ecology area to the south of the Site has been designed to flood and replicate a marshland habitat. This area will therefore be at 0.2mAOD and the adjoining car park floor levels will be set at 0.7mAOD along the southern edge and will be designed to flood safely and in a controlled manner for events greater than 1 in 20 years. Further, a combination system of attenuation tanks, permeable paving, green roofs, and vegetated drainage channels will provide appropriate surface water

management across the proposed development that would return surface water runoff rates back to Greenfield levels.

- 6.44 In terms of the submitted Flood Risk Assessment, the Environment Agency have advised that they have no objections to the proposed development, subject to Informatives

### **Planning Obligations**

- 6.45 Policy DC72 of the LDF emphasises that in order to comply with the principles as set out in several of the Policies in the Plan, contributions may be sought and secured through a Planning Obligation. Policy 8.2 of the London Plan states that development proposals should address strategic as well as local priorities in planning obligations.
- 6.46 Policy DC29 states that the Council will seek payments from developers required to meet the educational need generated by the residential development. Policy 2 of the submitted Local Plan seeks to ensure the delivery of expansion of existing primary schools.
- 6.47 Evidence clearly shows a shortage of school places in the Borough - (London Borough of Havering Commissioning Plan for Education Provision 2015/16-2019/20). The Commissioning report identifies that there is no spare capacity to accommodate demand for secondary, primary and early year's school places generated by new development.
- 6.48 Since 1<sup>st</sup> September 2019 Education contributions have not been sought as Havering CIL would cover school places funding.
- 6.49 The Rainham and Beam Park Planning Framework seeks to deliver a new Beam Parkway linear park along the A1306 including in front of this site and seeks developer contributions for those areas in front of development sites. The plans are well advanced and costings worked out – based on the frontage of the development site to New Road, the contribution required for this particular site would be £ 221, 452.50. This is necessary to provide a satisfactory setting for the development rather than the stark wide New Road.
- 6.50 Policy DC32 of the LDF seeks to ensure that development does not have an adverse impact on the functioning of the road network. Policy DC33 seeks satisfactory provision of off street parking for developments. Policy DC2 requires that parking permits be restricted in certain circumstances for occupiers of new residential developments. In this case, the arrival of a station and new residential development would likely impact on on-street parking pressure in existing residential streets off New Road. It would therefore be appropriate to introduce a CPZ in the streets off New Road. A contribution of £112 per unit (total £80,304.00) is sought, plus an obligation through the Greater London Council (General Powers) Act 1974 to prevent future occupants of the development from obtaining parking permits.



## **Sustainability and Energy**

- 6.51 To mitigate to climate change and minimise emissions of carbon dioxide, when considering planning applications the Mayor of London, in accordance with London Plan Policies 5.2 and 5.3, will assess the use of sustainable design and construction measures. Specifically, London Plan (2016) Policy 5.2 requires new residential buildings to achieve zero carbon standards by October 2016.
- 6.52 The proposal is accompanied by an Energy Statement. The reports outline an onsite reduction in carbon emissions by 35%, to include a photovoltaic strategy, which aims to further reduce CO2 emissions across the entire site. In assessing the baseline energy demand and carbon dioxide emissions for the site, a financial contribution of £877, 173.00 has been calculated as carbon emissions offset contribution in lieu of on-site carbon reduction measures. The development proposal, subject to contributions being sought would comply with Policy 5.2 of the London Plan.
- 6.53 The non-residential units have been designed to achieve BREEAM 'Very Good', in accordance with LBH Core Strategy and Development Control Policy DC49. London Plan (2016) Policy 5.15 requires new residential development to be designed so that mains water consumption is less than 105 litres per day per head and the proposed development would also conform to this policy requirement.

## **Financial and Other Mitigation**

- 6.54 The proposal would attract the following section 106 contributions:
- Sum of £221,452.50, or such other figure as is approved by the Council, towards provision of Linear Park in the vicinity of the site
  - Sum of £80,304.00 , or such other figure as is approved by the Council, towards CPZ in streets north of New Road
  - Sum of £877,173.00 or such other figure as is approved by the Council, towards the Council's Carbon Offset Fund
  - Sum of £680,150.00 or such other figure as is approved by the Council, towards the Bus Mitigation Strategy
- 6.55 The proposal would also attract Mayoral Community Infrastructure Levy (CIL) at an overall rate of £25 per sq. m (resulting in approx. £1,032,050.00) and the London Borough of Havering CIL contributions at £55 per sq. m (resulting in approx. £2,220,295.00) to mitigate the impact of the development.
- 6.56 There is no biodiversity interest in the site. Suitable conditions are recommended.

- 6.57 As advised within the Consultee Responses section of the Report, there are Cadent Gas and Thames Water assets within proximity of the site; relevant Informatives would address this issue.
- 6.58 Due to the previous industrial uses on part of the site, the land is likely to be contaminated. There is also an identified hazard with regards to pipelines at or near the site. Suitable planning conditions are recommended to ensure remediation of the site.

## **Conclusions**

- 6.59 All other relevant policies and considerations have been taken into account. Planning permission should be granted subject to the conditions outlined above for the reasons set out above. The details of the decision are set out in the **RECOMMENDATION**.