



Havering
LONDON BOROUGH

**Strategic Planning
Committee
28 May 2020**

Application Reference:	P1609.19
Location:	Former Car Park, London Road, Romford, RM7 9DU
Ward:	Brooklands
Description:	Redevelopment of vacant former car park site to provide residential development of 88 self-contained units of part 4, 5 and 6 stories. Includes provision of communal amenity areas, parking, landscaping and access arrangements.
Case Officer:	Nanayaa Ampoma
Reason for Report to Committee:	The application is of strategic importance and has been subject to pre-application presentation to members of the committee.

1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 1.1 There are no in principle objections to the proposals and through the application of conditions and a legal agreement, officers consider that they are able to secure a good level of design and high quality materials. There have been no objections received from statutory or internal consultations, subject to recommended conditions. Objections have been received from neighbours,

however these objections have been reviewed by officers as part of the assessment and it has been concluded that the quality and merits of the proposals outweigh any harm. In addition, the proposals would have no significant harm on neighbouring amenity.

- 1.2 The approach to site layout, height and massing represents an acceptable form given the location of the site being on the corner of a junction and facing onto a busy main road. A full suite of supporting technical information has been submitted which successfully demonstrates that neighbouring amenity would be adequately safeguarded. Policy compliant levels of internal floorspace, amenity space and parking have also been incorporated into the scheme.
- 1.3 The proposals as they progressed were presented to Members at the Strategic Planning Committee on the 27th June 2019 and the 15th August 2019. On both occasions Members raised no significant issues regarding the scale or general principle of the development.
- 1.4 The development would make an important contribution to housing delivery within the Borough by securing 88 residential units with 35% (25 units) affordable housing units. Although the proposed density would be greater than that set out in the Density Matrix, the overall quantum of development and associated density reflects national, regional and local level policy objectives that seek to encourage the most efficient use of land within accessible urban settings and the residential development would accord with the sustainable development directive provided by the NPPF (2019). In addition, the new Draft London Plan notes that the Density Matrix is a restricted and arbitrary means of assessing the acceptability of developments within a location and more bespoke methods of assessment in keeping with local needs should be applied.
- 1.5 The recommended conditions and Heads of Terms would secure future policy compliance by the applicant on the site and ensure any unacceptable development impacts are mitigated. Therefore officers consider that all matters have now been sufficiently addressed and the application for detailed planning consent is recommended to Members for approval.

2 RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission subject to the following:
 - Legal Agreement pursuant to s106 of the Town and Country Planning Act 1990 and other enabling provisions, with the following Heads of Terms:
 - Affordable Housing 35% to be delivered with a tenure split of 64%:36% between social rent and shared ownership.
 - Affordable housing rent levels secured/units to be secured.

- Job Brokerage x 3 roles or £3526 for each role in lieu to be indexed
 - Traffic Management contribution of £8979 (£102 per unit) Indexed.
 - Travel Plan (including the appointment of a Co-ordinator) submitted to be secured and monitoring fee of £5000
 - Restriction on obtaining parking permits for occupiers – car free scheme pursuant to Section 16 Greater London Council (General Powers) Act 1974
 - Controlled Parking Zone contribution to be determined dependent on extent of zone expansion required (contribution to be indexed).
 - Carbon offset fund contribution in respect of shortfall of the residential units to achieve a 100% reduction in carbon dioxide emissions compared to Part L of the Building Regulations 2013, such sum calculated at sixty pounds (£60.00) per tonne that falls below the 100% threshold, for a period of 30 years, duly Indexed,
 - 2x on street car club parking spaces.
 - Reasonable legal fees for the drafting and negotiation of the deed whether or not it goes to completion
 - Monitoring fee towards the Council costs of monitoring compliance with the deed £8640
- 2.2 That the Assistant Director of Planning is delegated authority to negotiate the legal agreement indicated above and that if not completed by the 23rd October 2020 the Assistant Director of Planning is delegated authority to refuse planning permission or extend the timeframe to grant approval.
- 2.3 That the Assistant Director Planning is delegated authority to issue the planning permission and impose/negotiate conditions and informatives to secure the following matters:

Conditions

1. Time Limit
2. In Accordance With Approved Drawings
3. Material Samples
4. Accessibility and Adaptability
5. Secured by Design
6. Construction Management Plan and Demolition Plan
7. Delivery and Servicing
8. Landscaping
9. Boundary Details
10. Contaminated Land Investigation
11. Living Roofs Details
12. Air Quality Assessment
13. Air Quality Neutral Assessment

- 14.Noise protection (London Road)
- 15.Noise protection measures (Airborne Noise)
- 16.Photovoltaic Panel Details
17. Water efficiency
- 18.Archaeology 1
- 19.Archaeology 2
- 20.Archaeology 3
- 21.Refuse and Recycling Details
- 22.Surface Water Drainage Strategy
- 23.Final SUDs Strategy
- 24.Cycle Parking facilities
- 25.Cycle Parking Management Plan
- 26.Car Parking Management Plan
- 27.Electrical Charging Points
- 28.Construction Hours
- 29.NRMM (non-Road Mobile Machinery)
- 30.No Pilling
- 31.Levels
- 32.Vehicle Cleansing
- 33.Pedestrian Visibility Splays To Access
- 34.Management Plan 2x on street Car Club spaces (5 years)
- 35.Removal of satellite dish PD
- 36.Communication Equipment

Informatives

1. NPPF positive and proactive
2. Secure by design
3. Planning obligations
4. Changes to the public highway
5. Highway approval required
6. Temporary use of the public highway
8. Street naming and numbering
- 10.Community Infrastructure Levy (CIL)

3. SITE AND SURROUNDINGS

- 3.1 The application site lies to the west of the Borough, approximately 1 mile from Romford town centre and a 20 minute walk to Romford Station. The site falls within the Brooklands Ward.
- 3.2 The L-shaped site measures 0.41 hectares and is located on the corner of London Road and Spring Gardens. The site is vacant save for two small buildings in the north eastern corner of the site, with the remainder of the site used as surface level car parking. The topography of the site is flat and free of

vegetation aside from several mature trees around the perimeter of the site. The existing car park is used for motorcycle tuition and overspill parking for the Romford Greyhound Stadium, the latter of which is no longer required on account of the major improvement works recently completed at the stadium. The northern and western boundaries of the site front Spring Gardens, with the southern boundary fronting London Road, brick and steel warehouses are located adjacent to the eastern boundary of the site.

- 3.3 The area surrounding the site is a mix of residential, industrial and commercial uses. The prevailing residential typology is 1930s semi-detached terraces, though there are newer flatted developments including three to four storey apartment blocks on Spring Gardens. The Crown Public House to the west of the site has been granted planning permission (appeal reference APP/B5480/W/16/3153011) for a change of use from A4 (drinking establishing) to C3 (dwelling houses), part demolition of the public house and construction of 24 apartments. Crowlands Primary School is located to the south west of the site, on the opposite side of London Road. The Coral Greyhound Stadium is also located south of London Road. Romford Town Centre is located 1.25km east of the site. The site has a Public Transport Accessibility Level (PTAL) of 1B, with access to bus route 86 (Stratford to Romford) from the stop immediately in front of the site, and train services to Liverpool Street, Shenfield and Upminster are available from Romford Station.
- 3.4 The application site does not fall within a conservation area, there are no listed buildings on or near the site and there are also no Tree Preservation Orders (TPO). Although there are some mature Category B trees on site, there are no Category A trees.

4 PROPOSAL

- 4.1 The application seeks planning permission for the redevelopment of the existing car parking area which previously provided car parking for 130 spaces to serve the Corals Greyhound site. The proposed development would be residential with 88 1-4 bedroom units, built over 4-6 storeys. 10% of the units would be wheelchair accessible.
- 4.2 The proposed development would have four cores A-D with shared amenity at the roof level. There would be 899sqm of outdoor communal amenity space and private amenity viable balconies and terraces. 472sqm is also allocated to children play spaces.
- 4.3 The application proposes 35% (25 units) affordable housing based on habitable rooms. This would be a split of 64% affordable rent and 36% shared ownership. The building would have an overall height of 19.5 meters.
- 4.4 56 car parking spaces are proposed with 9 wheelchair spaces and 3 visitor spaces. Cycle storage for 160 bicycles would also be provided at ground floor.

16 of these spaces would be dedicated to visitors. In addition, 2x on street car club spaces are being provided. These are to be secured via S106.

- 4.5 Refuse and recycling facilities are also proposed at ground floor with further details to be required by condition. The development is projected to reduce carbon emissions by 42%.
- 4.6 In terms of material finish, renders have been provided illustrations of the imagined finishes. However final material details would come forward via condition.

5 PLANNING HISTORY

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

- There is no relevant planning history.

6 STATUTORY CONSULTATION RESPONSE

- 6.1 A summary of consultation response are detailed below:

- ***Transport for London:*** No objections. However the proposed car parking spaces should be provided as part of the purchase of the units and not sold separately.
- ***Environment Agency:*** No comment received.
- ***Thames Water:*** No objection subject to Ground Water Risk Permit informative and condition on pilling.
- ***Natural England:*** No comment.
- ***London Fire Brigade:*** No objection. No further fire hydrants required.
- ***London Fire and Emergency Planning Authority:*** No comment.
- ***Metropolitan Police Secure by Design Officer:*** No objection subject to the attachment of secured by design conditions.
- ***LBH Flood & Water Management:*** No objection. FRA and Drainage Strategy acceptable.
- ***LBH Environmental Health:*** No objection subject to conditions governing contaminated land, air quality, remediation, noise and sound insulation.

- **LBH Highways:** No objection subject to conditions governing works to the public footpath, highways works and vehicle cleansing. Also, the following legal heads of terms are required:
 - Traffic Management contribution of £8979 (£102 per unit) Indexed. For the review of waiting and loading restrictions on loading restrictions on London Road. To be provided at the start of development
 - Travel Plan (including the appointment of a Coordinator) submitted to be secured and monitoring fee of £5000
 - Restriction on obtaining parking permits for occupiers.
 - Controlled Parking Zone contribution £112 per unit to be indexed
 - 2x car club spaces to be secured via S106 for 5 years
- **LBH Education Services and Skills:** No objection. Economic Development requiring Job brokerage provisions to be secured under S106 x3 roles or £3526 for each role in lieu to be indexed or figure.
- **LBH Flood Officer:** No objection. The proposed Flood Risk Assessment and Strategy is acceptable.
- **Historic England (Greater London Archaeology Advisory Service):** Initially made comment that further details were required. These details were submitted by the applicant. Following these details Historic England have commented that the development is acceptable subject to conditions.
- **LBH Refuse and Recycling Officer:** No objection.
- **LBH Travel Plan:** No objection. However it would be useful to be provide with the contact details of the Travel Plan Coordinator for the scheme. This has been conditioned.

7 COMMUNITY ENGAGEMENT

- 7.1 In accordance with planning legislation, the developer has consulted the local community on these proposals as part of the pre-application process. A public consultation exercise was also undertaken on 3rd of April 2019 at the Pavillion, Carol Greyhound Stadium. Consultation leaflets were delivered to 1132 homes two weeks prior to the event. This was attended by 30 members of the public including some local councillors.

8 PREAPPLICATION DISCUSSIONS

Strategic Planning comments (27th June 2019, 15th August 2019)

- 8.1 The development proposals evolved over a number of pre-application discussions with the applicant. As part of this process the initial scheme was presented to the Committee for general comments in June and August 2019. Comments received by Members are detailed below.

Comments made by Members June 2019:

SPC Comment	Applicant Response
Clarification sought on whether the existing trees around the perimeter of the site would be retained.	The existing trees are not governed by Tree Protection Orders and have been assessed by ACD Arboriculture. In agreement with Officers, it was deemed acceptable to replace the trees with similar but more suitable species in terms of management and maintenance (leaves dropping onto London Road, reduce frequency of pollarding etc). Four new semi-mature Ginkgo Biloba (Maidenhair tree) trees are proposed along London Road. These are anticipated to grow up to 7m in height by year 5 of planting.
Clarification was also sought on the amenity space strategy.	All units benefit from private balconies and/or terraces in addition to 7 areas of shared amenity space. 649sqm of communal amenity space is proposed (policy-compliant), with each core benefitting from its own dedicated area and onsite play space calculated from its child yield.
The developer was invited to consider the level of car parking provision and whether the proposed provision would be appropriate given the low level of bus accessibility.	Car parking increased following SPC1 by 27% to 56 spaces (from 44), including 9 accessible spaces. In addition, 2 car club spaces will be provided via Enterprise and equivalent to 13 - 17 spaces each.
The developer was also invited to consider whether the proposed unit types meet the borough's accommodation needs, notably family units.	Family-sized units increased following SPC1 to 17 units (from 12) comprising 3 x Private 3b, 2 x Shared Ownership 3b, 10 x Rent 3b and 2 x Rent 4b. Total family units = 29% of floor area/28% by Habitable Room.
Further detail was sought on how the ground floor layout of the development takes into account designing out crime principles.	Meeting held with Secured By Design officer 10/07/19 and comments incorporated including improved front-on access to duplex units. Conditions are in

	place to secure the final specification of secure doors, windows etc.
Further details were sought on the width of the junction between London Road and Spring Gardens with regards site lines for vehicle access and egress to the site	Vehicular visibility for access/egress and internal turning space manoeuvrability confirmed within the submitted transport statement. Planning conditions can require more detail to be submitted and approved if considered necessary.

Comments made by Members August 2019:

SPC Comment	Applicant Response
The proposed proportion of family sized units still fell short of the draft Local Plan requirements	<p>Family units were increased to 28% following SPC 1 and provide a suitable balance between local and commercial demand. While 100% of the proposed affordable housing units would be family units. All family units have been carefully planned to meet or exceed space sizes.</p> <p>The applicant believes the Rented tenure is where the most demand for family units is required and has responded to that accordingly. The majority of the proposed Rented units (80% by hab room) are 3 and 4 bedroom family housing including a number of duplex units with their own front doors providing direct access to the street and private terrace to the rear at 1st floor. The remainder of the Rented units being 2-bedroom 4 person dwellings. Following SPC1 3 Private family units were incorporated along with 2 Shared Ownership. The s106 can detail the relevant units to ensure rented units are best-suited to local need.</p>
Important that there was an effective traffic management plan in place in regard to how spaces would be allocated and parking controls enforced. Parking spaces should be prioritised (i.e. allocated or offered first to the family sized units no matter what their tenure)	<p>A Parking Management Plan was provided as part of the application's Transport Assessment. To ensure the on-site parking provision is utilised as effectively as possible, the proposed parking strategy for the 56 spaces (2 x car club being separate) is as follows:</p> <p>9spaces (10% of units) are designed to have disabled access and will be</p>

	<p>available to qualifying residents (including 2 x family units).</p> <p>15 spaces will be allocated to the remaining family units (all 17 family units having space).</p> <p>3 spaces allocated as visitor bays in perpetuity.</p> <p>Any accessible spaces not taken by disabled purchasers will be allocated to the Management Company to operate as additional visitor bays until required for use as a resident's dedicated accessible bay, with the exception of two accessible spaces which will be tied to the two disabled family units regardless of ability of the occupier.</p> <p>-The remaining twenty-nine spaces will be available for sale on a first-come-first served basis to residents.</p> <p>-Planning conditions can require more detail to be submitted and approved if considered necessary.</p>
There appeared to be no provision for visitor parking	3x visitor car parking spaces are now provided.
The applicant should approach the Council so they had the first opportunity to take on the affordable units rather than a housing association	Contact was made with Officers following SPC1 and offer received for the Affordable Housing units; discussions are ongoing pending Decision.

8.2 Progress of development:

Unit Type	SPC 1	SPC 2	Current App
1 B	39	37	37
2B	40	34	35
3B	7	15	15
4B	2	2	2
Residence Pking	44	46	56
Visitor Pking	0	0	3

9 LOCAL REPRESENTATION

- 9.1 The application was advertised via a Press Notice and Site Notice displayed at the site for 21 days.
- 9.2 A formal neighbour consultation was also undertaken with 45 neighbouring properties notified of the application and invited to comment. Comments have been received from 5 neighbours
- 9.3 The following local groups/societies made representations:
- Romford Civic Society:
The Romford Civic Society oppose the development on the grounds of scale and impact to street scene. The “fussing” doors at ground floor create an unnecessary “impression on the street scene”. We were unable to view the environmental details to confirm that the scheme is carbon compliant. We were also unable to view the tenure mix at the time of writing.
- 9.4 The following Councillor(s) made representations:
- None.
- 9.5 The following neighbour representations were received:
- 2 objectors
 - 2 support
 - No petitions have been received.
- 9.6 A summary of neighbour comments is given as follows (as only material comments can be considered as part of the application assessment, these comments have been divided into “material” and “non-material” comments):

Material Representations

Objections

- The development would cause significant parking pressures as most families already have two cars.
- The proposed building height at 6 storeys is unacceptable for the location.
- There are too many cycle parking facilities being proposed.
- The proposed development would lead to greater pressures on local schools. Therefore, this should be considered.

Support

- We support the application and welcome the high level of affordable housing and high quality design – just what the area needs.

Officer Response: The above comments are addressed within the Design, Amenity and Highways sections of the report.

Non-material representations

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

- Previous developments have led to the increased use in drugs and laughing gas, noise and fly tipping in the area. This has also led to greater police presence.
- Officers should visit the approved sites once they are completed to see what the actual resulting build looks like.

Officer notes: Each application must be considered on its own merit and by the details submitted at the time of submission.

Procedural issues

9.8 The Romford Civic Society commented that they were unable to confirm that the development would meet the minimum 35% carbon reduction limits and the unit mix at the time of their comments. This was due to technical difficulties at the time that have since been rectified. However, the development would make 42% carbon reduction and have 56% family units which is supported by officers.

10 MATERIAL PLANNING CONSIDERATIONS

10.1 The main planning considerations are considered to be as follows:

- Principle of Development
- Design
- Housing Mix
- Affordable Housing
- Impact on Neighbouring Amenity
- Environment Issues
- Parking and Highways Issues
- Sustainability
- Flooding and Drainage

- Community Infrastructure Levy

Principle of Development

- 10.2 The existing site was previously used as an overspill carpark for Carols Greyhound Stadium. Since this time, it has been sold as it was no longer required for the purposes. There are no formal employment or other uses on site. The use as a car park is not protected through any existing planning policies. Therefore, the proposed scheme would not lead to the loss of any protected uses on site.
- 10.3 The area around the site is mixed use in character with a number of residential streets nearby. Therefore, the proposed use would complement other uses within the local vicinity. As such, subject to the compliance of all relevant policies the development is acceptable in principle.
- 10.4 In addition, policy CP1 of the adopted Core Strategy aims to meet a minimum housing supply of 535 within Havering by enabling high density residential developments within Romford and bring vacant property or sites into use. To this end, the development would be in compliance with the aims and objectives of this policy.

Design

Scale, massing and streetscene

- 10.5 The National Planning Policy Framework (2019) attaches great importance to the design of the built environment. Paragraph 124 states *'The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'*
- 10.6 The London Plan also contains a number of relevant policies on character, design and landscaping. Policy 7.1 of the London Plan further emphasizes the need for a good quality environment, with the design of new buildings supporting character and legibility of a neighbourhood. Policies 7.4 and 7.6 of the London Plan state that new development should be complementary to the established local character and that architecture should make a positive contribution and have a design which is appropriate to its context. Policy 7.7 states that tall building should be limited to sites close to good public transport links and relate well to the scale and character of surrounding buildings, improve the legibility of an areas, have a positive relationship with the street and not adversely affect local character.
- 10.7 Policy DC61 of the Core Strategy and Development Control Policies Development Plan Document states that planning permission will only be

granted for development which maintains, enhances or improves the character and appearance of the local area.

- 10.8 The proposed block has been designed as a large predominantly L-shaped building with car parking provisions in its centre. It would have several entrances off the street into duplexes which would encourage interest at its frontages.
- 10.9 The building line of the block sits forward of the its neighbour at 248. However, there is no defined building line along the street and there is already a very wide paving area in front of the site owing to the design of the plot. The proposed property line does however follow that of the residential houses from 232 London Road.
- 10.10 The proposed building would extend the full length of the Spring Gardens frontage. At 4-6 storey tall, the proposed building would be higher than those surrounding it. While there is an expired permission for The Crown pub next door, work on this development has not started yet and there is no indication that this development is likely to come forward in the future. Nevertheless, permission was approved via appeal in September 2016 for a three storey unit. In addition, looking at the wider location, there are a number of 3 and 4 storey buildings, including those at 1-43 Autumn Court and 1-56 Cornmill House. However careful consideration has been given to the design and massing at 6 storeys. The bulk of the height has been designed to be sited toward the junction of the two roads before stepping down to 4 storeys at either side toward the boundaries eastern of the site.
- 10.11 In contrast to smaller or infill sites, large corner plots on major roads can be considered more suitable for additional height than the existing pattern of development providing an acceptable transition and build up in scale is achieved. Given the need for additional housing in the borough, the need to maximise the quantum of development and affordable housing provision means that it is reasonable to test heights and forms of development which do not necessarily follow the established scale. In this case, it is considered that the six storey maximum height helps define the corner of this junction. The proposed block with help anchor this part of London Road and give it a clear identity from those around it., although 6 storeys is unlikely to be acceptable throughout the road. The distribution of height and massing throughout the three blocks is well balanced. Therefore, the height of the block is considered to be a positive contributor at that corner.
- 10.12 There have been a number of neighbour comments objecting to the style of the proposed building and high number of units, with houses preferred. However, given the pressures on land, the need to balance the economic benefits of the scheme so that further developments can come forward and the growing

pressures for homes, a development of houses alone at the site would likely be unviable and would not sufficiently contribute to meeting the housing demand in the area.

- 10.13 There is a clear balance to be made between the need to provide for the growing demand for housing within the Borough and the type of housing suitable to meet this demand. Unfortunately, as the Council cannot meet the housing needs through its own funding, the economic benefits of these schemes must also become an important element of the assessment. The current scheme is a clear attempt to contribute towards the Borough wide housing targets.
- 10.14 The original design of the blocks included greater number of materials within the pallet and a front projection at each entrance. This was removed and the material pallet reduced to allow for a simpler design. It is considered that the proposed materials are acceptable. Further details are required regarding mortar types, exact brick and renders and metalwork samples, officers consider that the details currently presented are provide adequate detail to demonstrate that a high quality finish can be achieved.
- 10.15 The building roof has been utilised for green and brown roofs and would house a number of PV (photovoltaic) panels. Details of which is to be secured via condition. There are also play areas at this height. As such, it is important that officers understand the safety treatments proposed at the boundary of these areas. Therefore, a condition is required to secure the detailed design of these to be presented to officers for approval.
- 10.16 Overall, the development would contribute positively to the surrounding area and would enhance the area visually subject to securing high quality finish through the details required by condition.

Trees

- 10.17 Policy DM01 (Trees and Woodland) requires that development proposals are assessed through the following vehicle:
- where appropriate, retaining trees of nature conservation and amenity value and making tree preservation orders
 - ensuring that adequate measures are put in place when granting planning permission to protect trees during construction works
 - supporting the implementation of the Thames Chase Plan and ensuring that, development within the area makes a positive contribution towards its implementation
 - not granting planning permission for development that would adversely affect ancient and secondary woodland.
- 10.18 It is important that developments properly consider the impact of any trees that may be lost as a result of the proposals and any protection measures for trees

to be retained. Trees and woodland act as an important visual amenity to the quality of the wider green space and local environment. They also help soften the character of an area, while providing shading and privacy. Where possible, the Council will look to retain existing trees of high quality to help retain biodiversity especially where they contribute positive contribution to the surrounding area. Existing trees should be safeguarded and when protected trees are to be felled the Council will, where appropriate, require replanting with trees of an appropriate size and species.

10.19 The application is supported with a landscaping strategy for the development. The majority of the amenity landscaped areas are at roof level. However at ground level the application proposes to remove three existing trees at the front of the site. These trees have been identified as Category B and C trees. Although the site does not fall within a Conservation Area and it is in keeping with the above stated policies to consider retention where possible. The application proposes to remove all three trees. Officers expressed a desire to retain these trees. However two are Category C trees and the applicant has provided a tree report which demonstrated that it would not be possible to properly protect the tree protection zone during construction or safeguard its roots once the development was complete. Given the design of the proposed front elevation and the entrance areas it was not possible to retain the existing trees.

10.20 However in keeping with the above policy, the applicant proposes to replace these with four trees. The type and age of these trees are to be agreed via condition.

Quality of residential accommodation

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

10.22 All units comply with the London Plan and the National Technical Housing Standards in terms of overall size, storage, communal space and bathroom size. Therefore it is considered that all units are of an acceptable quality.

Amenity Space

10.23 Havering's Residential Design SPD does not prescribe minimum space standards for private amenity space stating that the fundamental design considerations for amenity space should be quality and usability. However, balconies should be incorporated into all developments and should, as a

minimum, be 1.5 metres in depth to allow adequate space for a table and chairs and should be secure in keeping with the London Plan. The development proposed balconies in all upper storey units and some terraces at ground floor. In addition, a total of 899 square metres of communal amenity space is also proposed across the development. This is significantly higher than the required outdoor amenity space stated under the London Plan of 457sqm.

- 10.24 There are areas specifically designated for play totally 472sqm. However details regarding the exact play area treatment and equipment are required to be secured by condition. It will be required that they comply with the most up to date advice on children's play areas. However, the position and space given to play is suitable and considered safe.

Sunlight and Daylight to Proposed Units

- 10.25 The applicant has provided an internal and external daylight assessment against the Building Research Establishment (BRE) guidelines for the these forms of development, measuring the average daylight factor (ADF) within living rooms to understand the amount of daylight afforded to these spaces. An ADF of 5% is recommended for a well day lit space, 2% for partly lit, below 2% the room will likely be dull and require electric lighting. As a minimum of 1.5% ADF for living rooms is recommended.
- 10.26 The assessment considers the likely levels of sunlight, daylight and views of the sky for possible future residents as well as the possible loss of light to existing occupiers from neighbouring properties.
- 10.27 It demonstrates that overall (when adjusted in keeping with the guidance), all amenity spaces would comply with the BRE standards. 227 of the 259 (88%) of the rooms tested would fully comply with BRE standards. In some cases where rooms did not comply with these criteria, this was owing to the position of an overhanging balcony. Where rooms failed there was generally still good visibility to the sky and none of the rooms were primary living spaces such as bedrooms or living rooms. The rooms that failed were primarily kitchens and dining rooms. These achieved an LDF of 1.5%. There are four north facing, single aspect units. However, two of these are duplex's.
- 10.28 Overall these units are considered to be of a generous size and are therefore suitable. The overall outlook and light levels to all these units, including the Block A north facing units, are considered acceptable. There would be no significant impact on the level of sunlight and daylight amenity to existing neighbours compared to the existing arrangements at the site. The sites immediate neighbours are of a much lower storey level. However, these are all commercial uses. Therefore, it is considered that the development is acceptable.

10.29 In light of the above, the overall development would provide a good quality of accommodation for future occupants in terms of daylight and sunlight.

Access/Disabled Units

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

Part M4(2)

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

Part M4(3)

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

10.31 Details submitted with the application demonstrate that the development would comply with these requirements. In addition, the applicant has accepted a condition to ensure that the development would be in full compliance with the provision of M4(2). As such, the relevant condition will be applied.

10.32 The development makes provision for policy M4(3). Nine wheelchair accessible units are proposed under the scheme which equates to the required 10% of the total units. However it is unclear exactly which units have been allocated. Therefore a condition will be attached to any permission requiring compliance.

Secured by Design

10.33 In terms of national planning policy, paragraphs 91-95 of the National Planning Policy Framework (2012) emphasise that planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. In doing so planning policy should emphasise safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.

10.34 The above strategic approach is further supplemented under Policy 7.3 of the London Plan which encompasses measures to designing out crime to ensure that developments reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. In local plan policy terms, policies CP17 and DC63 are consistent with these

national and regional planning guidance. The SPD on Designing Safer Places (2010), forms part of Havering's Local Development Framework and ensures adequate safety of users and occupiers by setting out clear advice and guidance on how these objectives may be achieved and is therefore material to decisions on planning applications.

- 10.35 In keeping with these policies, officers have consulted the Metropolitan Police to review the submitted application. They have commented that the application is acceptable subject to conditions stipulating that prior to the commencement of development the applicant shall be required to make a full and detailed application for the Secured by Design award scheme and thereafter adhere to the agreed details following approval. These conditions will be attached.

Density

- 10.36 The development proposal is to provide 88 residential units on a site area of 0.41ha which equates to a density of 214units per ha. The site is an area with a low accessibility rating of PTAL 1b (Poor). Policy DC2 of the LDF specifies a density range of 50-80 units per hectare; the London Plan suggests a general density range of between 35-110 dwellings per hectare depending upon the setting in terms of location. The higher densities are supported in sites located within 800 metres of a Metropolitan town centre. The site is approximately 800 metres from the edge of the defined town centre (in a straight line) at its nearest point. 11.33 In all cases policy DC2 notes that the requirements on density can be overruled where there is sufficient justification to do so. The London Plan density matrix also does not represent a hard rule but rather a guidance to development. The high density need not represent an area of conflict on policy grounds. More recently, the Greater London Authority has issued guidance that whilst the London Plan Density Matrix provides direction on how site potential can be reached, density should not be applied mechanistically and without due consideration to other factors. Councils should take into account aspects such as the local context, design quality, transport capacity and social infrastructure.

- 10.37 In this case, although the PTAL is low, the site has a bus stop in front with 24 hour regular bus service to Romford and Stratford. There are local shopping facilities nearby on London Road and the site is within reasonable walking distance of the town centre. The proposals for the site have also been housing need led with 35% affordable and a good level of family units. Therefore, in this particular instance, a density in excess of guidance is considered to be acceptable on balance.

Housing Mix

- 10.38 The NPPF (2018) seeks to steer development to deliver a wider choice of high quality homes, widen opportunities for home ownership and create sustainable,

inclusive and mixed communities. Policy 3.8 of the London Plan encourages new developments offer in a range of housing mix choices. The above policy stance is to allow Londoners a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.

10.39 Policy DC2 sets out an indicative mix for market housing of 24% 1 bedroom units, 41% 2 bedroom units, and 34% 3 bedroom units. DC6 states that in determining the mix of affordable housing, regard should be paid to the latest Housing Needs Survey. The Council's Housing Strategy (2014) which was informed by an extensive Housing Needs and Demands Assessment (2012) suggested that 75% of the rented provision should be one or two bedroom accommodation and 25% three or four bedrooms and for intermediate options.

10.40 The current application proposes a total of 88 residential units with a division of 42% one beds (37 units), 39% 2 beds (2% 2B3P-2 units; 36% 2B4P-32 units), 17% 3 beds (15 units) and 2% 4 beds (2 units). This mix results in 56% family units (including 2bed 4person units) and therefore represents a very high number of family units overall. In addition, 100% of the affordable rented units would be family units. The development also includes 10 duplex apartments. The proposed mix is welcomed.

10.41 While the policy mix identified in policy DC2 is the Council's preferred approach, the supporting text requires that any short comings in these mixes could be mitigated with other benefits. It should also be noted that the supporting text to London Plan Policy 3.4 states *"While there is usually scope to provide a mix of dwelling types in different locations, higher density provision for smaller households should be focused on areas with good public transport accessibility (measured by Public Transport Accessibility Levels [PTALs]), and lower density development is generally most appropriate for family housing."* The development leans towards the higher density development. However, officers consider that there are a number of benefits to the scheme which far outweigh its exact mirroring of the policy mix table. As detailed above the development provides a high number of family units (as defined by the London Plan) and meets the affordable housing criteria.

10.42 In addition, of the proposed affordable housing units 80% are family sized units. This would go some way to helping address the much-needed family units identified in the housing needs survey.

Affordable Housing

10.43 Currently, the Council has an aspiration to achieve 50% of all new homes built as affordable and seeks a split of 70:30 in favour of social rented (policy DC6). All major developments should meet at least 35% affordable unless they are able to demonstrate that this is not possible. London Plan Policy 3.11 states

that affordable housing provision should be maximised, ensuring an average of 17,000 more affordable homes within London over the course of the Plan period. Policy 3.13 emphasises that Boroughs should normally require affordable housing provision on a site which has capacity to provide 10 or more homes. Policy 3.12 sets out that “negotiations on sites should take account of their individual circumstances including development viability and in support of this, the London Plan requires a tenure split of 60:40 in favour of affordable rented.

- 10.44 The Mayor of London’s Supplementary Planning Guidance, Homes for Londoners (2017), states that it is essential that an appropriate balance is struck between the delivery of affordable housing and overall housing development. Under its “Fast Track Route” policy, it is required that development land not in public ownership or public use should be expected to deliver at least 35 percent affordable housing without a grant in order to benefit from the Fast Track Route (i.e. no need to test the viability of the proposal).
- 10.45 The preferred tenure split as set out under policy CP2 of the London Borough of Havering’s Local Development Framework (2008) is for 70% of affordable housing to be delivered as social/affordable rent and 30% intermediate, to include London Living Rent and Shared Ownership.
- 10.46 The proposed development would result in 35% affordable housing (25 units) with a split of 64% (16 units) social rented and 36% (9 units) shared ownership. This provision is in keeping with the minimum affordable housing units to be secured under such schemes. The proposed tenure mix is also largely policy compliant. Therefore the development would meet both LBH policies and the London Plan’s. See below table:

Proposed	1+	2+	3+	4+	Total
Market	32	28	3		63
Affordable	5	6	12	2	25
Totals	37	34	15	2	88

- 10.47 As the development would meet the required policy percent no early and late stage triggers are required.

Impact on Neighbouring Amenity

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

- 10.49 The amenity context of the site is that it sits at the corner of Spring Gardens and London Road. Therefore, there are neighbours only to one side of the development – to the east of the site. Here there are a number of commercial and warehouse blocks. To the southeast are the properties at 244 and 248. To the northeast is the Spring Gardens Business Park. Here Glenville House, which is a warehouse building borders the side. No objections have been received from any of these properties. However, a letter of support was received from the adjoining business unit.
- 10.50 The nearest residential property to the site is The Cottage (Spring Gardens) which is across the road north of the site, and Willows Care Home at 227-229 London Road which is across the road on the south side of the site. The Cottage is 21.5 metres from the site and the care home is 28 metres away. Windows are proposed looking towards both properties. However, the care home is sufficiently distant from the proposed development for this not to lead to significant harm. Therefore, it is not considered that there would be any adverse impact from the development towards this property. An objection has been received from the occupiers at The Cottage. This objection highlights a number of concerns such as the likely increased parking pressures from the development. Further discussion of this is stated in the Highways section below. However, this neighbour did not object on residential amenity such as loss of light, overshadowing, enclosure or loss of outlook. In both cases the distance between the development and the two closest properties is not considered to result in harm in privacy and outlook.
- 10.51 The applicant has submitted a sunlight and daylight study looking at the likely impact of the development on nearby residents. It found that out of the 27 habitable windows tested for the care home all passed but one which fell short of the 20% minimum NSL. This scored 23%. Officers consider this to be marginal. However, it would comply with VSC requirements. The assessment found that all the properties on Spring Garden including The Cottage would fully comply with BRE guidance on sunlight and daylight. In light of this, officers consider that the proposed sunlight and daylight impacts are acceptable. This proposal would make no significant difference on neighbouring amenity.
- 10.52 Whilst the development would represent an intensification of the use at the site, the proposed residential use is consistent with the existing character of the area. A noise assessment was submitted with the application and this has been reviewed by the Council's Environmental Health Officer who has raised no objections. Any additional noise generated from the development would be controlled via conditions and further details.
- 10.53 Details submitted with the application demonstrate that the development would not result in significant harm to the amenity of existing nearby residents in such

a way as to be unacceptable. No unacceptable or cumulative operational noise impacts are identified for neighbours as a consequence of the proposed development. Furthermore, no objections have been raised by neighbouring properties pertaining to harmful noise. Therefore, subject to final noise details being secured via condition, the development would be acceptable on noise grounds.

Environmental Issues

- 10.54 The Environmental Health Officer has raised no objections in relation to any historical contaminated land issues, air pollution or noise. The Environment Agency has also been consulted and have made no objection by way of environmental matters.
- 10.55 A Contaminated Land study was undertaken and submitted with the application. This concluded that contamination levels at the site and any associated risk levels were considered “Moderate” to “Low”. It should also be noted that the site is brownfield land and currently benefits from use for parking. The Council’s Environmental Health Officer has commented that the proposed location is suitable for residential housing and only standard conditions are required to safeguard any contaminations found on site at a later date. This will be attached.
- 10.56 The proposed development is located within an area of poor air quality which suffers from high concentrations of nitrogen dioxide. Therefore it has been designated as an Air Quality Management Area (AQMA). To safeguard against additional unnecessary impacts to air quality, conditions are recommended to mitigate future impacts during the construction and operational phases of the development, including details to protect the internal air quality of the buildings as well as a requirement for ultra-low carbon dioxide boilers. These will be secured.
- 10.57 A noise assessment has been submitted by the applicant. The report demonstrated that noise from the neighbouring commercial units was not audible. Therefore, there would be relatively little noise experienced by future occupants of the block from these uses. The Environmental Health officer has raised no objections to these findings. However, conditions governing final mitigation measures for internal and external noise control will be attached to ensure that final noise impacts from and to the development are minimised by any plant or other equipment.
- 10.58 The application site falls under Flood Zone 1. Flooding and drainage strategies have been submitted with the application and will be discussed in later sections. However, the proposed methods have been accepted by the Flood Officer.

Parking and Highways

- 10.59 Policies CP9, CP10 and DC32 require that proposals for new development assess their impact on the functioning of the road hierarchy. The overriding objective is to encourage sustainable travel and reduce reliance on cars by improving public transport, prioritising the needs of cyclists and pedestrians and managing car parking. A Transport Assessment has been submitted with the planning application as is required for all major planning applications.
- 10.60 Policy DC33 seeks to ensure all new developments make adequate provision for car parking. In this instance the application site is located within an area with a Public Transport Accessibility Level (PTAL) rating of 1b (Poor) where 6b (Excellent) is the highest. The site is 24 minutes' walk to Romford Station which provides train lines into Central London. There is also a bus stop in front of the site for bus 86 that would remain. Buses from this stop also go to Romford Centre.
- 10.61 The application proposes 56 off street parking spaces throughout the development. There is no CPZ in the area. However, funds have been secured by S106 to undertake a CPZ exercise (further discussion below). Subject to this process the development would be secured as car free with no right to parking permits for future residents of the development. Below is provided a breakdown of the highways provisions:

Parking

<i>Type</i>	<i>Proposed No.</i>
Cars	56
Visitor (Cars)	3
Disabled	9
Cycle	160
Visitor (cycle)	16

- 10.62 In addition, to the above, it is required that electrical car charging is provided at 20% active and 20 passive for meet future demand. This is in keeping with the London Plan policy requirements. This has not been indicated on plan. As such, a condition requiring 20% passive and 20% active electrical charging points in line with the London Plan will be attached for details to be provided at a later date.
- 10.63 Neighbour comments have been received on the grounds that the proposed development would lead to increased parking pressures in the area with the development only proposing 56 spaces. Neighbours have also commented that the development would increase traffic along the London Road.
- 10.64 Transport for London have been consulted and have raised no objections subject to conditions. The applicant has provided a Travel Plan with the

application. This has been assessed by the Council's Travel Plan Officer who has also raised no objections. A condition will be attached to require the appointment of a Travel Plan Co-ordinator prior to occupation with the aim of encourage sustainable methods of transport for occupiers and visitors. The Travel Plan will also be secured via S106 and be reviewed annually for a period of five years following occupancy.

- 10.65 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. Some parking controls in the form of yellow lines exist in this part of Spring Gardens, whilst there is a resident parking CPZ (Zone ROS) to the west and south of the site. Officers consider that given the likely number of new homes planned for the Romford area, it would be beneficial to review whether the nearby streets not currently restricted should be. In this case, it is recommended that a contribution be secured for CPZ implementation as well as parking permit restriction. If a CPZ is introduced, it would minimise conflict between existing and future residents over parking.
- 10.66 The applicant has agreed to the above contribution. The Local Highway Authority has raised no objection subject to the applicant entering into a Legal Agreement to prevent future occupiers from applying for parking permits. Subject to the completion of this agreement and the attached planning conditions, the proposal would be acceptable in highway terms and it is not considered that the proposed development would result in parking or highway safety issues. The legal agreement would be consistent with the other residential developments within this area.
- 10.67 The application also includes the provision of a car club for two vehicles to be parked at the front of the property on the public highway. The car club would provide transport for up to 25 users. The exact details of this are to be secured under S106 and condition. The use of the car club would help reduce the further need for private vehicles and contribute to reducing possible parking pressures as a result of the development. It is required that the car club be provided for at least 5 years with the management of this provision agreed with the highways officer and officers prior to occupation.
- 10.68 The application proposes refuse at ground floor. These provisions have been reviewed by the Designing Out Crime Officer as well as the Council's refuse and recycling department. No objections have been raised in regards to the location of the refuse or the proposed size. However further details pertaining to refuse management and the exact proposed size of bins are required. Therefore, a condition securing the refuse management plan will be attached to any permission to ensure these details are forthcoming. Lastly, a

Construction Management Plan condition is recommended to be attached to ensure neighbouring amenity is safeguarded and the highway network is not prejudiced.

Sustainability

- 10.69 In recognising the importance of climate change and the need to meet energy and sustainability targets, as well as the Council's statutory duty to contribute towards the sustainability objectives set out within the Greater London Authority Act (2007), Policy 5.2 of the London Plan requires all major developments to meet targets for carbon dioxide emissions. This is targeted the eventual aim of zero carbon for all residential buildings from 2016 and zero carbon non-domestic buildings from 2019. The policy requires all major development proposals to include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy.
- 10.70 The Mayor of London's SPG on *Housing* (2016) applies a zero carbon standard to new residential development, and defines zero carbon homes as homes forming part of major development applications where the residential element of the application achieves at least a 35 percent reduction in regulated carbon dioxide emissions (beyond Part L 2013) on-site. Furthermore, the Mayor of London's SPG on Sustainable Design and Construction (2014) provides guidance on topics such as energy efficient design; meeting carbon dioxide reduction targets; decentralised energy; how to off-set carbon dioxide where the targets set out in the London Plan are not met.
- 10.71 In terms of the Local Plan policy DC50 (Renewable Energy), there is a need for major developments to include a formal energy assessment showing how the development has sought to ensure that energy consumption and carbon dioxide emissions are minimized applying the principles of the energy hierarchy set out in the London Plan.
- 10.72 A Sustainability and Energy Report has been submitted and reviewed by officers. This has been undertaken to satisfy the following requirements:
- To demonstrate how the development shall reduce the carbon emissions by at least 35% over a similar gas heating system in relationship to Building Regulations Part L1A 2013 as required by the London Plan.
- 10.73 The approach to sustainable development is to improve the energy efficiency of the building beyond the requirements of Building Regulations. This follows the most recognised method of achieving sustainability through the energy hierarchy:

- Energy conservation – changing wasteful behaviour to reduce demand.
- Energy efficiency – using technology to reduce energy losses and eliminate energy waste.
- Exploitation of renewable, sustainable resources.
- Exploitation of non-sustainable resources using CO2 emissions reduction technologies.
- Exploitation of conventional resources as we do now.

10.74 Policy 5.3 of the London Plan seeks that developers utilise the highest standards of sustainable design and construction to be achieved to improve the environmental performance of new developments. Guidance of how to meet the requirements as presented from the above policy is further discussed within SPD Sustainable Design Construction (2009). This encourages developers to consider measures beyond the policy minimum and centred around development ratings, material choice, energy and water consumption.

10.75 Policy 5.9 of the London Plan emphasises that major development proposals should reduce potential overheating and reliance on air conditioning systems

10.76 The applicant's sustainability report demonstrates that the proposal would be able to meet 42%. This is a higher than the benchmark minimum of 35% set by the GLA. This is to be achieved through a number of measures across the development such as the use of sustainable construction methods, choice of building materials, energy reduction, installation of Photovoltaic panels at roof level and the introduction of brown roofs. The use of brown roofs would mitigate water runoff and sewer overflow by absorbing and filtering water that would normally be directed to gutters, increasing volume during wet weather. The green roof will also add to a greener air flow in the location by removing air particulates and producing oxygen.

10.77 However this is below the required 100% stated under the London Plan. In keeping with the GLA methods, the remaining regulated carbon dioxide emission reductions will be met through a Section 106 contribution to the Council's offsetting fund in order to meet the zero carbon target. In light of this, officers accept the lower provision and will secure the remaining 58% by S106 off site contributions charged at £60 per tonne.

10.78 In recognising the need to protect and conserve water supplies and resources a series of measure and guidance has been provided under Policy 5.15 on of the London Plan where it stresses that planning decisions should seek development to minimise the use of mains water by incorporating water saving measures and equipment and designing residential development so that mains water consumption would meet a target of 105 litres or less per person per day. This is supplemented under Standard 37 from the Mayor of London's SPG on *Housing* 2016, the target set out in this standard is in line with the lower optional

maximum water consumption requirement which is set out in Part G of the Building Regulations from October 2015.

- 10.79 Policy DC51 highlights the need for applicants, as a minimum, to incorporate a high standard of water efficiency which can include greywater and rainwater recycling to help reduce water consumption. Therefore a condition will be attached to ensure the 105 litre target is maintained.

Flooding and Drainage

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

- 10.84 The application site falls within Flood Zone 1 (low risk of flooding area) of the Environment Agency Flood Map. The site is therefore not located close to any culverts, rivers, marshes, Site of Special Scientific Investigation and other such water bodies. Therefore, no specific mitigation measures are required for the proposal. The existing site is drained by gullies which appear to connect to the Thames Water sewage systems. It is proposed that the new surface water drainage system would feed into these existing sewers. Foul water will discharge to Thames Water's sewer network. The applicant has also provided a supporting letter from Thames Water dated 19th July 2019 confirming that there is sufficient capacity in the existing infrastructure on site to provide for 102 flats. In addition, formal comments received from Thames Water do not object to the proposals.
- 10.85 Policy 5.13 of the London Plan states that developments should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so and applicants should aim for greenfield run-off rates. The applicant has confirmed that SUDs measures would be used at the site and would provide storage for 40%cc of rainwater. However insufficient details for the final SUDs Strategy has not been submitted contrary to the policy requirements. Accordingly, a condition in that regard is recommended to ensure the principles of SUDs are fully incorporated. Further details regarding the brown and green roofs are also required via condition.

Community Infrastructure Levy

- 10.86 The Mayor has established a CIL charging schedule with a recent amendment that came into force from 1st April 2019. The amendment increases the CIL contribution by £5 per square metre to £25. The proposed development would be liable for this charge. The development would result in 7843 square metres. Therefore, a mayoral levy of £196,075 is applicable, subject to any relief for social housing and/or existing floorspace.
- 10.87 The London Borough of Havering's CIL was adopted in September 2019. Therefore financial contributions for the education infrastructure will be secured via this mechanism. As the proposed floor area for the development is 7843 sqm and the CIL charging schedule applies a charge of £125 per sqm to any development in Zone A (any development north of the A1306). Therefore, the applicable levy is £980, 375 but this would be subject to relief for social housing and/or existing floorspace.

11. FINANCIAL AND OTHER MITIGATION

- 11.1 Policy DC72 of the LDF emphasises that in order to comply with the principles as set out in several of the Policies in the Plan, contributions may be sought and secured through a Planning Obligation. Policy 8.2 of the London Plan

states that development proposals should address strategic as well as local priorities in planning obligations.

11.2 The proposal is accompanied by an Energy and Sustainability Statement. The report outlines an onsite reduction in carbon emissions by 42%, to include a photovoltaic strategy which aims to further reduce CO2 emissions across the entire site. As the requirement is for 100% reduction, this would result in a shortfall of 58%. Therefore the Mayors calculation of a financial contribution of £60 per tonne in lieu of on-site carbon reduction measures is applicable. In the event of an approval and in compliance with the hereby attached conditions a final sum will be calculated. The mechanism for this will be secured via a S106 legal agreement in accordance with Policy 5.2 of the London Plan.

11.3 In light of the above discussions the proposal would attract the following section 106 Heads of Terms/contributions to mitigate the impact of the development:

- Affordable Housing 35% (based on habitable rooms) to be delivered with a tenure split of 64:36 between social rent and shared ownership.
- Affordable housing rent levels secured/units to be secured.
- Job Brokerage x 3 roles or £3526 for each role in lieu to be indexed or figure
- Traffic Management contribution of £8979 (£102 per unit) Indexed.
- Travel Plan (including the appointment of a Co-ordinator) submitted to be secured and monitoring fee of £5000
- Restriction on obtaining parking permits for occupiers – car free scheme
- Controlled Parking Zone contribution £112 per unit to be indexed.
- Carbon offset fund contribution in respect of shortfall of the residential units to achieve a 100% reduction in carbon dioxide emissions compared to Part L of the Building Regulations 2013, such sum calculated at sixty pounds (£60.00) per tonne that falls below the 100% threshold, for a period of 30 years, duly Indexed, and the commercial units; and in respect of the commercial units to achieve a 35% reduction in carbon dioxide emissions compared to Part L of the Building Regulations 2013, such sum calculated at sixty pounds (£60.00) per tonne that falls below the 35% threshold, for a period of 30 years, duly Indexed
- 2x on street car club parking spaces and provision for up to 5 years.
- Reasonable legal fees for the drafting and negotiation of the deed whether or not it goes to completion
- Monitoring fee towards the Council costs of monitoring compliance with the deed £8640
- Any other planning obligation(s) considered necessary by the Assistant Director Planning

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

12 HOUSING DELIVERY TEST

- 12.1 On 13 February 2020 the Government published the 2019 Housing Delivery Test (HDT) results. The results show that within Havering 33% of the number of homes required were delivered over the three year period of 2016-17 to 2018-19. The NPPF (paragraph 11d) states that where the delivery of housing was substantially below (less than 75%) the housing requirement over the previous three years, the policies which are most important for determining the application are considered out of date. This means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. This is commonly referred to as the “tilted balance” in favour of sustainable development and is a significant relevant material consideration in the determination of the planning application.
- 12.2 The proposed development would contribute to boosting housing supply and delivery and this weighs in favour of the development. The assessment of the planning application has not identified significant harm nor conflict with development plan policies and where there is some harm/conflict identified it is considered that these do not outweigh the benefits of the proposal. It is therefore considered that in this case, the proposal does benefit from the presumption in favour of sustainable development set out in paragraph 11 d) of the NPPF.

13 CONCLUSIONS

- 13.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires the Council to determine any application in accordance with the statutory development plan unless material considerations indicate otherwise. All relevant policies contained within the Mayor’s London Plan and the Development Plan, as well as other relevant guidance and material considerations, have been carefully examined and taken into account by the Local Planning Authority in their assessment of this application.
- 13.2 The preliminary proposals for the site were subject to consideration by the Strategic Planning Committee and comments made in those forums have been input into the development. For example, the number of family units have significantly increased and visitor parking is now incorporated. The proposal would not unduly harm the amenities of existing neighbouring residential properties through significant or unacceptable loss of light or outlook. It would provide for much needed quality family housing, including 25 affordable units

of which 80% are family sizes, all with a good standard of accommodation including outlook, privacy and access to daylight.

- 13.3 As conditioned, the proposal would not compromise the character of the locality or any nearby historic environments or buildings. It accords with the relevant development plan policies and conforms to the design principles and parameters established by the Council's policies.
- 13.4 Although the development is of a much denser and higher scale than those currently around it. It is considered that the corner location of the site and its facing the wide London Road renders it appropriate for the location. The scale is also in keeping with the Council's aim to encourage denser developments close to the centre of Romford to help address the Boroughs growing demand for housing. The detailed design of the scheme which is supported.
- 13.5 Furthermore, in accordance with the NPPF and the poor housing delivery within the Borough, the benefits of the proposal outweigh any policy conflict or harm identified and represents sustainable development which should be approved.
- 13.6 In light of the above, the application is **RECOMMENDED FOR APPROVAL** in accordance with the resolutions and subject to the attached conditions and completion of a legal agreement.