



Havering
LONDON BOROUGH

**Strategic Planning
Committee
25 June 2020**

Application Reference:	P1809.19
Location:	Serena Court, Solar Court & Sunrise Court, Parkhill Close and Sunrise Avenue, RM12 4YT
Ward:	St Andrew's
Description:	Demolition of existing buildings, construction of five buildings built over 3-10 storeys comprising 175 residential units including ancillary communal facility (Class C3), associated car & cycle parking, landscaping and other associated works.
Case Officer:	Nanayaa Ampoma
Reason for Report to Committee:	The application is of strategic importance and has been submitted in partnership with the London Borough of Havering. The Local Planning Authority is considering the application in its capacity as local planning authority and without regard to the identity of the Applicant.

1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 1.1 There are no in principle objections to the proposals and through the application of conditions and a legal agreement officers are able to secure a good level of design and the use of high quality materials. The application is supported by

the Greater London Authority (GLA) and the LBH's Regeneration and housing divisions as it would contribute to the housing demand in the Borough.

- 1.2 The approach to site layout, height and massing represents an acceptable approach given the location of the site. This initial scale and design was also reviewed by Members of the Strategic Planning Committee. A full suite of supporting technical information has been submitted which successfully demonstrates that neighbouring amenity would be adequately safeguarded. Policy compliant levels of internal floorspace, amenity space and cycle parking have also been incorporated into the scheme.
- 1.3 The development would make an important contribution to housing delivery within the Borough by securing 175 units with 134 affordable housing units. Although the proposed density would be greater than that set out in the Density Metrix, the overall quantum of development and associated density reflects national, regional and local level policy objectives that seek to encourage the most efficient use of land within accessible urban settings and the residential development would accord with the sustainable development directive provided by the NPPF (2019). This density is also supported by the Greater London Authority (GLA) for the development and the site.
- 1.4 The recommended conditions and Heads of Terms would secure future policy compliance by the applicant on the site and ensure any unacceptable development impacts are mitigated. Therefore officers consider that all matters have now been sufficiently addressed and the application is recommended for approval.

2 RECOMMENDATION

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

Any direction by the London Mayor pursuant to the Mayor of London Order Legal Agreement pursuant to s106 of the Town and Country Planning Act 1990 and other enabling provisions, with the following Heads of Terms:

- Early and late Stage Viability Review Mechanisms attached.
- Affordable housing split 60:40 (units 80:54), Affordable housing tenure breakdown Affordable Rent (80 units), 76% affordable housing (134 units) and Shared Ownership (54 units),
- Affordable housing rent levels secured
- Shared ownership units maximum income £90,000
- Shared ownership annual housing cost no more than 40% of value
- Affordable housing breakdown and unit location
- 38% CO²
- 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,

- Job Brokerage 4 per 10,000spm of development
- Travel Plan (including the appointment of a Co-ordinator)
- Highways contribution of up to £114,525 for carriageway works to Sunrise Avenue, footway improvements in the vicinity of the site and street light enhancement in the vicinity of the site.
- Reasonable legal fees for the drafting and negotiation of the deed whether or not it goes to completion
- S106 monitoring fee towards the Council costs of monitoring compliance with the deed

2.2 That the Assistant Director Planning is delegated authority to negotiate the legal agreement indicated above and that if not completed by the 31st December 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 conditions and informatives to secure the following matters:

Conditions

1. Time Limit
2. In Accordance With Approved Drawings
3. Material Samples (including entrance details, mortar, edge, canopies etc)
4. Hard and Soft Landscaping
5. Landscape Maintenance Strategy
6. Secured by Design
7. 90% of the dwellings shall be designed to be Category 2 'Accessible and adaptable' and 10% Wheelchair Adaptable Dwellings
8. Window and Balcony Details
9. Updated Communal Area Plan
10. Access and Maintenance Strategy for lifts
11. Archaeology
12. Photovoltaic Panel Details
13. Brown/Green Roof Details
14. Boundary Treatments including defensible spaces.
15. Fire Strategy
16. Energy Statement Compliance
17. Air Quality Low Emissions Boilers
18. Air Quality Neutral
19. External Lighting Scheme
20. Noise Protection Buildings

- 21.Noise Protection Plant Machinery
- 22.Remediation Strategy
- 23.Non-Road Mobile Machinery
- 24.Surface Water Drainage Strategy
- 25.Ecology Appraisal
- 26.Biodiversity Method Statement
- 27.Biodiversity Enhancement Strategy
- 28.Final Sustainable Drainage Systems (SUDs)
- 29.Water efficiency
- 30.Levels
- 31.Car Parking Plan (EVCP, disabled spaces)
- 32.Car Parking Design and Management Plan
- 33.Vehicle Cleansing
- 34.Vehicle Access Prior to Occupation
- 35.Cycle Parking and Scooter Storage Area Details
- 36.Cycle Parking and Scooter Management Plan
- 37.Demolition and Logistics Plan
- 38.Construction Method/Management Statement
- 39.Delivery and Servicing Plan
- 40.Travel Plan
- 41.Construction Hours
- 42.Vehicle Cleansing
- 43.Refuse and Recycling Details (including Management and on site provision)
- 44.Removal of satellite dish PD

Informatives

1. Gas Grid
2. Changes to the public highway
3. Highway legislation
4. Temporary use of the public highway
5. Adoption of roads
6. Surface water management
7. Highway approval required
8. Secure by design
9. Street naming and numbering
10. Community Infrastructure Levy (CIL).
11. Planning obligations
12. NPPF positive and proactive
13. Thames Water Groundwater Risk Management Permit

3. SITE AND SURROUNDINGS

- 3.1 The application site covers an area of just over a hectare (1.08 hectares) and has a Public Transport Accessibility Level (PTAL) rating of 1B(Poor). The site falls under Flood Zone 1 (low risk of flooding area) of the Environment Agency Flood Map. However the site is within four minutes' walk of the Ravensborne River which feeds into the larger water body at Harrow Lodge Park which is within easy walking distance from the site.
- 3.2 The application site lays within equal distance of Hornchurch Station and Elm Park both being about 5 minutes by car and 20 minutes on foot. The existing site benefits from a cluster of 55 Council owned properties used as sheltered residential accommodation for the over 55s. These properties are primarily two storey at Sunrise Court and Serena Court, while Sunrise Lodge is a single storey property. Prior Approval (F0005.18) has already been granted for the demolition of all the buildings on site and formal demolition works have been completed as of November 2019.
- 3.3 The area around the site is predominately residential in nature. To the immediate north of the site is a car parking area, while to the east and south of the site are the rear gardens of the properties at Sunrise Avenue, Bethany Close and Abs Cross Lane. These are 1-2 storey houses. To the west of the site sites three tower blocks two of which are 13 stories (Uphavering House/Overstrand House) and 1 of which is 14 storeys (Parkview).
- 3.4 The application area does not fall within a conservation area and there are no listed buildings on site and there are also no Tree Preservation Orders (TPO). However there are currently 47 trees on site ranging from Category B, C and U trees. There are no Category A trees. There are no statutory designations within the site itself i.e. there are no Scheduled Monuments, Areas of Outstanding Natural Beauty (AONBs), SSSI, National Parks, World Heritage Sites, Special Areas of Conservation, Special Protection Areas (SPAs) or Ramsar Sites.
- 3.5 The application has been brought forward as part of the joint venture partnership between Havering Council's Regeneration team and Wates Residential Development Group. The partnership aims to redevelop 12 Council owned sites across the Borough to deliver 3,000 homes over the next 10 years.

4 PROPOSAL

- 4.1 The application seeks planning permission for the demolition of the existing residential blocks at Solar Court, Serena Court and Sunrise Lodge on Sunrise Avenue. However it should be noted that the proposed demolition already benefited from permission under Prior Approval. The demolition would make

way for the redevelopment of the site to reprovide 175 residential units under Class C3. Five individual blocks build over 3-10 storeys are envisaged with a breakdown of these blocks being provided as follows:

Block	Storeys	No. of Units	Bike/Scooter Space
A	4-5	38	42/9
B	4-5	25	38/8
C	8-10	55	95/17
D	6-8	40	67/12
E	4-5	27	41/9

4.2 The existing site currently benefits from 55 residential units used for social housing for over 55s. Under the application, these residents would have a “right to return”. This also means that there would be a net increase of 120 units at the site when compared to the original number of units (55-175). The proposed development would continue to serve the over 55s and would include:

- A community building (ground floor Block C)
- 420sqm central communal green courtyard
- 76% affordable housing (60:40), (affordable rent>shared ownership)
- 10% of total units disabled access friendly
- 91 parking spaces including 18 visitor spaces, 10 Blue Badge spaces and 20% electrical vehicle spaces. Resulting parking ratio 0.52 per dwelling.
- A total of 296 cycle parking spaces or 55 scooter spaces can be accommodated.

4.3 The proposed affordable residential units would have an overall mix as follows:

Units Counted Across All Block Floors				
<i>Unit</i>	<i>Affordable Rent</i>	<i>Shared Ownership</i>	<i>Market</i>	<i>Total Number</i>
<i>1B2P</i>	80	35	22	137
<i>2B4P</i>	0	19	19	38
<i>Total</i>	80	54	41	175

4.4 Refuse and recycling are also proposed at ground floor via sustainable underground refuse storage (URS) facilities. URS's are not able to store larger waste goods so storage for larger waste goods are provided in Block B entrance. This space would be shared for residents across all three Blocks.

4.5 At present a mix of four bricks are to be used with metal details of bronze to balconies and the main entrances. In terms of material finish, the final pallet is to be agree via condition.

4.6 Green and brown roofs are also proposed at the roof level of all the blocks.

5 PLANNING HISTORY

5.1 The following planning decisions are relevant to the application:

- **F0005.18:** Prior Approval for Demolition of buildings on Site. - ***Prior Approval Not Required, April 2019***
- **Z0005.18:** EIA Screening Opinion. - ***Screening Opinion issued, July 2018***

6 STATUTORY CONSULTATION RESPONSE

6.1 A summary of consultation response are detailed below:

- ***National Grid:*** No objection.
- ***Historic England (GLASS):*** The archaeology details submitted fail to provide a comprehensive assessment of the historic environment of the location or fully consider the sites prehistoric value. Therefore a precommencement condition is required to ensure that the required works are undertaken correctly.
- ***Transport for London:*** 296 cycles paces meet the required London plan minimum. However the proposed cycle arrangements for Blocks A, B, C and E do not comply with policy. Each Block should have access to Sheffield stands. No objection. Further comments to follow. It is required that the development make provision for 18 disabled parking spaces in total for future uses not 14. This will be required to be demonstrated within the Parking Design and management Plan to be secured by condition. Travel Plan, Construction Logistics Plan and Delivery and Servicing Plan to be secured via condition.
- ***Greater London Authority (Stage 1):*** The proposals are supported in principle but currently fail to comply with the London Plan or the emerging London Plan. The proposed housing mix although fails the normal mix criteria is strongly supported in this case owing to the proposed end users. There is no objection on design or amenity. In addition the below should be secured under SS106:
 - Early implementation and late stage review mechanisms should be secured for the affordable housing units.

- Annual housing cost (including servicing charges, rent and any interest payments) should be secured as no greater than 40% of the housing cost.
 - Overheating checklist and dynamic heating analysis is acceptable.
 - Proposed housing mix strongly supported given the current and proposed end users.
 - The scheme would make a positive contribution to the future choice (quality and accessibility) of specialist housing.
 - Design acceptable and residential quality being high.
 - The emerging London Plan policies place less importance on density but rather encourages a design lead approach. Therefore in this instance the density of 165 is acceptable.
 - 38% CO2 acceptable.
 - The approach to urban greening has been maximized within the proposed development
 - A Fire Strategy should be secured
 - A Travel Plan
 - Therefore the development is acceptable subject to further details conditions and a Draft S106 agreement.
- **Environment Agency:** No objection
 - **Thames Water:** No objection subject to Ground Water Risk Permit informative and pilling condition.
 - **Natural England:** No comment.
 - **Place Services (Ecology):** No objection subject to conditions.
 - **NATS Safeguarding:** No safeguarding objection.
 - **London Fire Brigade:** No objection. No further fire hydrants required.
 - **London Fire and Emergency Planning Authority:** No objection subject to compliance with following requirements:-
 - Firefighting lift installed in blocks;
 - Wet rising main to be provided in the firefighting shaft (within 18 metres of appliance parking position);
 - Sprinkler system to be installed in accordance with BS9251:2005; dry raising main in south east stairwell (inlet within 18 metre of appliance).
 - **Metropolitan Police Secure by Design Officer:** No objection subject to the attachment of secured by design conditions and informative.

- **LBH Environmental Health (Land Contamination, noise, air quality):** No objection subject to conditions governing contaminated land, air quality neutral, residential boilers, non-road mobile machinery, noise and sound insulation.
- **LBH Highways:** No objection subject to conditions governing works to the public footpath, highways works and vehicle cleansing.
- **LBH Children's Services:** No comment.
- **LBH Refuse Officer:** No objection. URS guidance is currently being developed.
- **LBH Flood Officer:** No objection. The proposed Flood Risk Assessment and Strategy is acceptable.
- **Anglian Water:** No comment as the site is outside the Anglian Water area.

7 COMMUNITY ENGAGEMENT

- 7.1 In accordance with planning legislation, the developer has consulted the local community on these proposals as part of the pre-application process.
- 7.2 An initial meeting for residents to meet with the developer was held on 23rd May 2018. Followed by public engagement events on the 14th June and 25 September 2018. The events were advertised to 1290 addresses all within 500 metres of the site. These were attended by 27 members of the community and 21 written feedback responses was also received. The events were also attended by local Ward Councillors.

8 PREAPPLICATION DISCUSSIONS

Quality Review Panel (QRP) Comments

- 8.1 The application was presented to the QRP for comments on the 6th July 2018, and 19th November 2018. Final comments received from the panel were as follows:
- The panel believes that the lack of clarity around the intended residents is hampering the design work. A better understanding of the market for housing of this kind is essential, and the panel urges the design team to consult with established providers in this market to achieve this.

- The panel feels that the team should design in greater adaptability, particularly of internal spaces, so that the scheme can change with the needs of ageing residents, which will be very different at 80 than at 55.
- The panel welcomes the improvements made to the central public space, but feels that it is still somewhat amorphous. Given that it is the focal point of the community, more work needs to be done to refine it further, strengthening and defining the spatial hierarchy, making it less gardenesque and more 'civic' in character.
- The panel feels that the architectural character of the scheme does not yet fully respond to its context, but this could be achieved through greater attention to the detailing: the local character is reflected more in small, quirky features than in large buildings and grand statements.
- The panel feels that the layout is greatly improved, and in particular approves of the orientation of the blocks backing onto the houses on Abbs Cross Lane.
- However, it suggests exploration of how the terraced blocks could be articulated, to respond better to the context of semi-detached houses.
- The layout of the front three blocks could be refined, with further thought about their orientation in relation to the road, existing towers, and views out towards Harrow Lodge Park.
- The panel also feels that the design team should consider the potential to use three uniform blocks here, to simplify the scheme and to respond to the existing towers.
- The panel recognises that the high provision of car parking spaces is necessary but feels that, the scheme is still dominated by it.
- The panel would like to see more work done to create a distinction between the car parking and the roadway and to soften its visual impact, given that it is overlooked by many of the units. This could be achieved by using pergolas and augmenting the planting envisaged.
- It is also not clear how electric vehicle charging points will affect the space, which forms much of the public realm around the scheme and the panel feels that this should be addressed explicitly.
- Greater consideration should be given to the approach to the scheme, since arrival is currently diffused by the presence of extensive car-parking, making orientation difficult.
- The quality and distinctiveness of entrances, will also be important to support natural wayfinding. The entrance to the north pavilion block could in particular be made grander to signal the arrival point at the scheme as a whole.
- The panel has some concerns about the privacy of ground floor units surrounding the central space, which could feel very exposed without additional visual shielding. In particular, the panel has concerns about the lack of screening between the car park and the affordable units.

- The panel feels that the scheme's energy strategy should be revisited in the light of the requirements of the new London Plan. It will be important to future-proof the scheme in relation to energy, anticipating the likely move away from gas as a fuel source.
- The design team should focus on the comfort of residents, particularly with regard to the potential of overheating. For example, there is a balance to be struck between inset balconies, which provide for sheltered outside space and projecting balconies that provide greater shading.
- The panel feels that the internal communal space is important and is now better located, but greater clarity is required over its function and management.

Strategic planning comments (6th December 2018, 8th February 2019 and 10th October 2019)

8.2 A summary of comments received by the Committee on the 6th December 2018 were as follows:

- Security of the site and whether it would become a gated community
- Important that residents feel safe
- Location of CCTV monitors
- Quantum and ratio of car parking provision for residents and visitors
- Final car parking numbers should take into account limited frequency of bus routes
- Could a bus route be diverted to the site?
- The use of Dial-a-Ride
- Management of car parking within and beyond the site (next to the existing towers)
- Potential to remodel/widen the junction to improve access for road users
- Potential to factor in bus bays near to the junction
- Details of tenure and allocation policy. Priority should be given to Havering residents
- Manoeuvrability of individual units welcomed, make sure this is carried across to lifts and communal areas
- Suggested minimum age means that residents could still be working. How do you ensure that equity from property sale isn't 'banked' rather than being invested in a property within the development?
- Retirement age is 67. More detail is invited on the target client group and how the 'retirement community' concept works in practice
- Post meeting request: ensure that digital connectivity is built into the development

8.3 Comments received from Members on the 8th February 2019 presentation were as follows:

- Security of mobility scooters and whether they can fit into the lift

- Charging points for scooters. Who funds that?
- Assurance is needed about the security of the site and how the scheme meets Designing out Crime advice.
- Manoeuvrability of the site for Dial-a-Ride.
- Opportunity to improve the public transport connectivity into the site. Important to explore given level of car parking provision.
- Bus lay-by opportunity. A joint effort is needed for public transport investments.
- Need to understand in more detail the relationship to Havering House.
- Detail sought regarding the management of the site during construction (both building activity and traffic associated).
- Need to include details of the Parking Management Strategy.
- Can large vehicles use the road easily enough as it is a narrow road?
- Environmental credential of the scheme.

8.4 Following these presentations and Members comments, the scheme has amended in response as follows:

SPC Comments	Applicant Response
Further detail was sought on the suggested developer contribution towards bus stop enhancement on Abbs Cross Lane. A bus shelter was specifically requested.	There are two sets of bus stops close to the site, one by Sunrise Avenue (to the south) and another by Parkhill Close (to the north). The bus stops near Sunrise Avenue already have bus shelters. We have considered whether bus shelters could be provided to near Parkhill Close, however, the pavement isn't wide enough to accommodate them. We have reviewed the 'Accessible Bus Stop Design Guidance which indicates that all bus stops comply with the standards with 30m bus cages and appropriate kerb heights provided.
The Committee considered that a 'gated' approach to site security was the correct approach.	All the entrance routes into the site will be 'gated' providing a sense of enclosure and privacy as well as limiting car access. Pedestrian access will be possible for all visitors.
Whether there was scope to include some form of covered walkway between the blocks to provide shelter, subject to finding the right design solution.	We have investigated the travel distances to the Community Centre from each block and identified locations for covered structures for use during inclement weather. We did consider

	<p>whether a covered walkway would be appropriate, however, we felt this may not complement the open and green landscaping approach to the central garden. This would have also required significant on-going maintenance which would have to be passed onto residents. The paths have been designed with less mobile persons in mind and will provide suitable grip and gradients for wet weather. There will also be facilities for coats and umbrellas within the Community Centre.</p>
<p>The landscaping scheme should include pathways to encourage mobility and exercise.</p>	<p>The submitted landscaping masterplan (DWG No. 8096-SSS-XX-XX-DR-L-9111) sets out the proposed landscape design with the inclusion of pathways across the site. The proposed pathways allow the residents and visitors to have easy and comfortable access from a building to another but also to have access to various amenity spaces through the scheme. All paths have 1800mm minimum width to allow the passage of two wheelchairs and all angles are curved for better comfort.</p>
<p>Members expressed a desire not to have doorways opening straight on to footpaths.</p>	<p>The building entrances and doorways have been designed to create accessible and coherent access points into the residential blocks. Blocks B, C and D all have specific access paths leading to the doorways while Blocks A and E have set back entrances so as not to open directly onto the adjacent footpaths.</p>
<p>Members requested details regarding the location of the lounge and the inclusion of a small kitchen for tea/coffee making.</p>	<p>Revised communal layout is with Havering to review. Final layout to be agreed at a later date.</p>
<p>Whether the quantum of guest accommodation was sufficient and a keenness to understand the market data</p>	<p>We reviewed the provision of guest suites across schemes of a similar</p>

that suggested one guest room was sufficient.	nature, with most schemes providing one guest suite per site.
What the likely value of the service charge would be.	We have given due consideration to service charges and have been working with a service charge consultant to ensure a cost efficient solution for residents, whilst providing a well maintained and managed scheme. The details of the service charges are still under review.
Was the lift sufficiently sized to enable an ambulance trolley to be fitted within it.	We have 2 lifts per building. One is an 8-person lift, the other is a larger 13 person lift which is 2.1m deep by 900mm wide. This is intended to be large enough for a stretcher, the exact specification will be developed later in the design process.

9 LOCAL REPRESENTATION

9.1 The application was advertised via a Press Notice and Site Notice displayed at the site for 21 days.

9.2 A formal neighbour consultation was also undertaken with 250 neighbouring properties being notified of the application and invited to comment. Comments have been received from 3 neighbours

9.3 The following local groups/societies made representations:

- None.

9.4 The following Councillor(s) made representations:

- None.

9.5 The following neighbour representations were received:

- 1 objectors
- 2 comments.
- No petitions have been received.

- 9.6 A summary of neighbour comments is given as follows (as only material comments can be considered as part of the application assessment, these comments have been divided into “material” and “non-material” comments):

Material Representations

Objections

- The height of the proposed block would create a jungle feel compared to what was previously beautiful park area.
- Would block views from the property at Overstrand House
- The block should be no more than five storeys.
- Would the properties at 18, 20 and 24 Sunrise Avenue continue to have access to their properties from the rear? As the plans currently show a barrier. We use our garages/car ports/workshops for deliveries. We would like the current access arrangement to remain.
- Development would lead to loss of light to the property at 4 Bethany Close.

Support

- None.

Officer Response: The above comments are addressed within the Design, Amenity sections of this report. However it should be noted that comments received from the neighbour at Bethany Close were discussed with the neighbour. The main concern was that there would be some loss of privacy and increased overlooking to this neighbour. However discussions with the developer and a review of the plans demonstrated that there would be no windows from habitable rooms looking towards this property and in addition, any windows would that looked to these properties were for walkways and these would also be around 20 metres distance from the site to the neighbouring windows. These comments were relayed to the neighbour who was comforted by the details.

The submitted plans show that the existing access to 24 Sunrise Avenue would continue. There is no rear access currently to number 20, whilst there is a garage to the rear of number 18. The submitted plans access road would still be accessible to the rear of these properties, so access may still be possible, but the issue of right of access is a private matter rather than a planning consideration.

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.

- Illustrative material submitted with the application is limited and was the same as during the consultation.
- The whole planning process has been appalling. Representatives from the Council were unable to answer straightforward questions.

Officer notes: Unfortunately, no property address was submitted with this consultation response so officers are unable to fully respond to the comments. However it is unclear who the Council representatives were as they were not from the planning department. Whilst further illustrative materials would have been useful, the application is valid owing to the plans submitted. Therefore officers must make a decision on this.

Procedural issues

- 9.8 No procedural issues were raised in representations.

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 principle to redevelop the site has already been established by virtue of the current use which is also residential. Therefore the development would comply with the Council's current policy framework. Permission for the demolition of the development has also been given under Prior Approval (see permission F0005.18). 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.

- 10.3 In addition, policy CP1 of the adopted Core Strategy aims to meet a minimum housing supply of 535 within Havering by prioritising the development of brownfield land and ensuring these are used as efficiently as possible. Also resisting the loss of any housing. To this end, the development would be in compliance with the aims and objectives of this policy.

Design

Scale, massing and streetscene

- 10.4 The NPPF 2019 attaches great importance to the design of the built environment. Paragraph 124 states *‘The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities’*
- 10.5 Policies 7.4 and 7.6 of the London Plan state that new development should be complementary to the established local character and that architecture should make a positive contribution and have a design which is appropriate to its context. Policy 7.7 states that tall building should be limited to sites close to good public transport links and relate well to the scale and character of surrounding buildings, improve the legibility of an area, have a positive relationship with the street and not adversely affect local character.
- 10.6 Policy DC61 of the Core Strategy and Development Control Policies Development Plan Document states that planning permission will only be granted for development which maintains, enhances or improves the character and appearance of the local area.
- 10.7 The development proposes a total of 5 Blocks A-E. Three of these Blocks (B, C and D) have their front facing the main road of Sunrise Avenue, while the remaining two (A and E) are further back in the development sharing a boundary with the rear of the properties at Abbs Cross Lane. A quick breakdown of the storeys are provided below:

Block	Storeys	No. of Units
A	4-5	28
B	4-5	25
C	8-10	55
D	6-8	40
E	4-5	27

- 10.8 The application site is located in the predominantly residential area and these surround the site. There are three purpose built 12-13 storey blocks to the west of the site and two storey residential properties with their gardens bordering the site. The application site proposes 5 blocks or between 4-10 storeys. These storey heights reflect the existing context of the site in that the higher buildings

proposed relate to the existing context of the taller buildings adjacent with the height reducing closest to the lower buildings to the rear of the site

- 10.9 The proposed composition massing is considered acceptable by officers due to the scale of buildings directly adjoining the site. The spacing between blocks and proposed large central green space are all considered acceptable design features. The scale and general arrangement of the site has also been reviewed by the Quality Review Panel and GLA officers who have all commented that it is broadly acceptable. Therefore the distribution of height and massing throughout the five blocks is considered well balanced and the separation between the apartment blocks is considered to be suitable.
- 10.10 The proposed communal facilities would be within the ground floor of central building (C) facing the main access road and would represent the main entrance into the site. Here a different design approach is adopted through use of different materials to the other proposed buildings. At present, illustrative indications of materials have been provided in elevation forms with the exact materials and finishes to be agreed. The development would be a gated community in that entry to the communal courtyard area would be controlled by low railings and gates. This was supported by Members when initially presented at developer's presentation of the Strategic Planning Committee. Green and brown roofs with insert PV panels are also proposed at roof levels of all the buildings. Overhung balconies are proposed in the upper floors of all the blocks while at ground floor private communal space is provided to some units via small outdoor gardens.
- 10.11 In terms of materials, the original application provided images of the proposed yellow and red bricks as well as the proposed metalwork. The overall proposed material pallet is considered acceptable for the location. However officers have some concerns regarding the proposed mix of colours and finishes. The applicant has stated that the choice of bricks was informed by their wish to highlight the fact that the lower ground floor of Block C was for a different use. However officers felt that the use of the redbrick seemed out of place, unnecessary and detracted from the overall material composition. As a result the final brick and material details are to be agreed via condition.
- 10.12 There has been a number comment objecting to height of the development on the grounds that it would create a jungle feel and that blocks should be no more than 5 stores. However it is undeniable that there are three 12-13 storey apartment blocks at Uphaving House, Overstrand House and Parkview House. These are immediately adjacent to the site and therefore do form part of the context of the site. As such, officer consider that the development is modest in its scale with its highest block being 10 storeys.

- 10.13 A comprehensive green landscape with a good level of quality is proposed and illustrated in supporting material submitted with the application. The detailed design of these elements would be secured via condition.
- 10.14 The applicant makes provisions for sustainable modes of energy with the installation of Photovoltaic Panels (PV) on the roof of all three blocks. These would sit atop of brown and green roofs to further enhance biodiversity. Details for these will be secured by condition.
- 10.15 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. It would also make more efficient use of brownfield site while meeting a direct need for housing for the over 55s community who wish to live their lives as independently as possible. A Management Strategy for the shared facilities would also be secured via condition to ensure the day to day experiences of residents are further protected.

Quality of residential accommodation

- 10.16 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.
- 10.17 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

- 10.18 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. The London Plan requires that at least 5sqm of private amenity space is provided to any residential unit of up to 3 bedrooms with an additional metre being added for addition bedrooms.

10.19 The application proposes 400sqm of private amenity space through private terraces and balconies which all meet the LBH's depth requirements. The terraces are provided for the ground floor flats while all upper storey units benefit from balconies. In addition, a total of 720sqm of communal amenity space is also proposed through the ground floor central green area. This is slightly less than the required 875sqm under the London Plan. However subject to conditions ensuring quality and given the provision of the community facilities also, this is considered suitable.

Sunlight and Daylight to Proposed Units/Existing Dwellings

10.20. The applicant has provided an internal and external daylight assessment against the Building Research Establishment (BRE) guidelines for the lower parts of the blocks, measuring the average daylight factor (ADF) within living rooms to understand the amount of daylight afforded to these spaces. An ADF of 5% is recommended for a well day lit space, 2% for partly lit, below 2% the room will likely be dull and require electric lighting. As a minimum of 1.5% ADF for living rooms is recommended. The development proposed 175 units. Sixty-one of these units would be dual aspect units. As assessment of the impact of daylight and sunlight to the existing neighbouring properties has also been submitted. 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.

10.21 It demonstrates that overall (when adjusted in keeping with the guidance), all amenity spaces would comply with the BRE standards. 156 of the 389 (82%) rooms tested would fully comply with BRE standards on sunlight. The assessment also demonstrated that of the 389 rooms 311 would comply with BRE guidance on daylight. In some cases where rooms did not comply this was owing to the position of an overhanging balcony which is not usual for these forms of urban developments. However, where the rooms failed there was still good visibility to the sky of at least 50% of the units or the rooms were not primary living spaces such as bedrooms or living rooms. There are no single aspect north facing units. 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 are considered acceptable. Therefore it is considered that the development is acceptable in this regard.

10.22 Consideration has also been given to the impact on sunlight and daylight to be experienced by any existing neighbours once the development has been built. For this the most effected properties were reviewed. These were:

- 1-6 Bethany Close (east of development)
- 10-24 Sunrise Avenue (south of the development)
- Parkview House (13 storey block, west of development)

- Uphaving House (12 storey block, west of development)
- Overstrand House (12 storey block, west of development)

10.23 At Bethany Close, these properties would be around 20 metres away from the development. Two of the properties numbers 5 and 6 would fully comply with the required BRE guidance for daylight amenity while the properties at numbers 1, 2, 3 and 4 would be marginally affected. All units would experience the required level of sunlight and did not require further testing aside of one window at number 1 Bethany Close. However testing demonstrated that this window would comply also.

10.24 At Sunrise Avenue, seven of the eight properties fully complied with the BRE guidance on daylight. At number 24 two windows believed to be for a bedroom would receive marginal loss of daylight at a reduction of 0.7%. This margin is in keeping with policy. Two bedroom windows tested at the ground floor of number 22 would fail to fully comply with BRE guidance daylight. However this slight reduction is acceptable under the guidance because under the BRE directions greater importance on daylight is placed on living rooms rather than bedrooms which are seen to be used less throughout the actual day time. These properties would not experience any significant loss of sunlight.

10.25 At Overstrand House and Parkview, all windows would continue to receive similar levels of daylight and sunlight with no significant loss.

10.26 At Uphaving House tests demonstrated that the majority of windows would comply with the BRE standards on daylight and sunlight. However, six windows believed to be for kitchens would experience at least 63% of their previous levels. This has been reviewed by officers and the slight reduction has been accepted owing to the likely rooms.

10.27 In light of the above it is considered that the development is acceptable on sunlight and daylight measures both to neighbours and the future occupiers of the development.

Access/Disabled Units

10.28 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'

- 10.29 Details submitted with the application demonstrate that the development would meet the 90% 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.
- 10.30 Details submitted with the application also demonstrate that the development would provide 10% wheelchair adoptable units. Therefore the development would also comply with the provision of M4(3).

Secured by Design

- 10.31 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.
- 10.32 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.
- 10.33 In keeping with these policies officers have consulted the Metropolitan Police's Designing Out Crime team to review the submitted application. They have commented that the application is acceptable subject to conditions stipulating that prior to the commencement of development the applicant shall be required to make a full and detailed application for the Secured by Design award scheme and thereafter adhere to the agreed details following approval. These conditions will be attached.

Density

- 10.34 The development proposes to provide 175 residential units on a site area of 1.08ha which equates to a density of 162 units per ha. The site is an area with low to poor accessibility with a PTAL of 1b. Policy DC2 of the LDF specifies a density range of 50-80 units per hectare; the London Plan suggests a density range of between 35 and 95 dwellings per hectare depending upon the setting in terms of location.
- 10.35 However the density matrix does not represent a hard rule but rather a guidance to development. The high density need not represent an area of conflict on policy grounds. The Greater London Authority has issued guidance that whilst the London Plan Density Matrix provides direction on how site potential can be reached, density should not be applied mechanistically and without due consideration to other factors. Councils should take into account aspects such as the local context, design, transport capacity and social infrastructure. In addition, the GLA have been consulted and have commented that given the site location and opportunities at the site the proposed density is appropriate for the site. The emerging London Plan also places greater importance on a design lead approach rather than reliance on density to determine the acceptability of any scheme.
- 10.36 In addition, policy CP1 states that the Council will prioritise the efficient development of brownfield land to help meet the Boroughs housing targets. While policy CP2 states that sustainable communities should be encouraged by “ensuring that the required sizes and types of new housing are of a density and design that is related to a site’s access to current and future public transport and are compatible”. Officers are mindful of this need to design and build for the future of the Borough. TfL and the Council’s highways teams have all commented that the increase to the existing density is acceptable when consideration is given to the proposed end users. The proposal represents a more rationalised use of the site and meet the accommodation needs of over 55s. The development proposals have been considered by an independent design panel and the GLA who have both considered that the density is suitable for the site.
- 10.37 In light of the above, the proposed density is considered acceptable.

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, a recommended split of 40:40:20 for one, two and three bedroom accommodation.

10.40 The current application proposes a total of 175 residential units with a division of 78% one beds and 22% 2 beds. This mix results in no 3 bedroom family sized units and therefore fails to fully comply with the policy mix requirements. However the development has been specifically designed to meet the needs of over 55 years olds' who are mostly retired and are looking for somewhere to settle within a designed community. For this group, it is not considered that there is likely to be a need for family units. In addition, the proposed development has been designed to reprovided what is existing on site where there is no demand for family units. Therefore it is not considered that family units would be required in the circumstances of this particular development. Therefore the proposed mix is considered acceptable

Affordable Housing

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

10.42 The Mayor of London's Supplementary Planning Guidance, Homes for Londoners (2017), states that it is essential that an appropriate balance is struck between the delivery of affordable housing and overall housing development. Under its "Fast Track Route" policy, it is required that development land in public ownership or public use should be expected to deliver at least 50 percent affordable housing without a grant in order to benefit from the Fast Track Route.

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

10.44 The existing residential units on site total 55 units of which all are social housing. The proposed development would result in 76% affordable housing (126 units) with a split of 40% Shared Ownership and 60% Affordable rent. If the site did not already have social housing provision, this provision exceeds the minimum affordable housing units to be secured under such schemes – see further commentary below.

Housing option	Unit number	Percentage of total
Private	41	23%
Shared Ownership	54	30.9%
Affordable Rent	80	45.7%
Total	175	100%

Total unit breakdown

Tenure	Unit number	Percentage of total
Social Rent	55	41%
Affordable Rent	25	19%
Shared Ownership	54	40%
Total	134	100%

Total Affordable Housing breakdown

10.45 As the development is a Council lead scheme, there is a mandate for the developer to reprovide the existing 55 units as a minimum. In addition to these, the development further provides 120 units. Given the proposed end users and the likely residents it is considered that this mix is suitable as family units would not be required. The development provides 76% affordable which is supported by officers and the GLA. An early and late stage review mechanism would be secured by S106 as requested by the GLA. Therefore officers consider that the normal affordable housing mix can be overlooked against the benefits of the proposed scheme.

10.46 For the reasons outlined above officers are satisfied that the development accords with key policy objectives in relation to affordable housing provision. These provisions will also be secured via S106 planning obligations.

Impact on Neighbouring Amenity

10.47 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.

10.48 The proposed development is bounded by the properties at:

- 1-6 Bethany Close (east of development) *over 20 metres away*
- 10-24 Sunrise Avenue (south of the development) *over 20 metres away*
- Abbs Cross Lane *34 metres away*
- Parkview House (13 storey block, west of development) *11 metres away*
- Uphaving House (12 storey block, west of development) *32 metres away*
- Overstrand House (12 storey block, west of development) *28 metres away*

10.49 However there is a road between the proposed development and those properties at Parkview, Uphaving and Overstrand House. Also, those properties at Sunrise Avenue. All these properties are at least eleven metres away. Nevertheless, Parkhill Close would be the closest block at 11 metres away from the site. Here Block D (the closest Block from the development to Parkhill Close) has been angled away so that the proposed windows would not result in inter-looking between the block and the existing windows at Parkhill Close. Thereby reducing any likely loss of privacy or increased overlooking.

10.50 The proposed block would share a boundary with those properties at Abbs Cross Lane and Sunrise Avenue. Therefore aside of sunlight daylight considerations already discussed above, these are the most likely properties to be affected by the development.

10.51 In relation to the properties at Abbs Cross Lane, the development proposes terraces from Block A looking towards the rear gardens and elevation of these properties at the first, second and third floor of the five storey Block. Views from these floors would be restricted by large trees within the gardens of these properties. However, on the fourth floor, there are no residential windows looking towards these properties. In addition, it should be noted that the rear elevation of the properties at Abbs Cross would be over 30 metres away from the nearest Block (A). Officers consider that this is sufficient distance to safeguard the existing amenity of these residents.

10.52 At Bethany Close Block E would look to the rear of these properties. Careful consideration during the design stage was given to any loss of privacy or increased overlooking that might be experienced from the development to these neighbours. Neighbour comments were received from an existing occupier on the grounds that the development appears to be proposing a number of windows looking directly into the gardens of this cul-de-sac. The properties at Bethany Close would be around 20 metres away. While the rear elevation windows from this Block would look towards these neighbours, all the

upper floor windows would not be to habitable rooms but rather shared walkways. Therefore there is unlikely to be consistent overlooking as a result of the development. These comments have been relayed to the affected neighbour who has accepted them.

- 10.53 The applicant has submitted a sunlight and daylight study looking at the likely impact on the development on nearby residents. This is discussed in greater detail above, however concluded that there would be no significant loss of outlook, sunlight, daylight or overshadowing to any existing residents. In light of this, officers consider that the proposed sunlight and daylight impacts are acceptable.
- 10.54 Neighbour comments have also been received from a resident of Sunrise Avenue requesting confirmation that access from the rear of their site would continue. The submitted plans demonstrate that there would be parking spaces and a road between. The applicant has confirmed that access via the rear would still be possible as suggested by the plans.
- 10.55 Subject to the above, it is considered that the impact of the development in terms of neighbouring residential amenity impact would not be significant in terms of loss of daylight, outlook, overshadowing or loss of privacy. Therefore the development is acceptable on amenity grounds.

Environmental Issues

- 10.56 The Environmental Health Officer has raised no objections in relation to any historical contaminated land issues, air pollution or noise. The Environment Agency has also been consulted and has confirmed that there are no objections to the proposals by way of environmental matters.
- 10.57 A Contaminated Land study was undertaken with details submitted under the application. This concluded that contamination levels at the site and any associated risk levels were considered “Moderate” to “Low”. It should also be noted that the site is brownfield land and currently benefits from residential use. However the Council’s Environmental Health Officer has commented that the report does identify the presence of some contaminants in the soil. Therefore some remediation and contamination works would be required to secure the site for future use. These will be secured via conditions.
- 10.58 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.

10.59 The Environmental Health Noise officer has reviewed the Noise report submitted which states that given the location of the site there is unlikely to be significant noise generated that may represented greater harm to neighbouring residents. Therefore subject to conditions governing future machinery use the proposed development would be acceptable on noise grounds. These conditions have been attached.

Parking and Highways Issues

10.60 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.

10.61 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 1b (Poorest) where 6b (Excellent) is the highest. The application proposes 91 off street parking spaces throughout the development. The application site has a low PTAL of 1b. However there is no CPZ in the area. There are also some local buses with stops along Abbs Cross Lane. However the nearest stations at Hornchurch and Elm Park are 20 minutes' walk away. A comparative table of existing parking in the area is provided below:

Vehicle Parking

Type	Existing No.	Proposed No.
Cars	8	91
Disabled	0	10
Cycle/scooter	0	296/55
Visitor	0	18
Drop of bays	0	2

10.62 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. Car parking would be provided at ground floor predominately to the north and south of the site. These provisions have been reviewed by officers with the Highways team and TfL and are considered sufficient to meet the needs of the end users. However, 20% passive and 20% active electrical charging points in line with the London Plan are required and will be secured via condition.

- 10.63 Cycle parking is proposed for 296 bicycles. Given the proposed end users consideration has also been given to the possible use of the cycle parking space for mobility scooters also. At present, it appears that cycle parking units would be 95% double stacked. These can be cumbersome and require significant strength to use. Given the proposed end users it is not considered suitable that the majority of these units are stackable. TfL have also commented that at least 20% cycle spaces be Sheffield stands. It is considered that there is sufficient space within the buildings and around the site to accommodate suitable cycle and mobility scooter provision, therefore a condition will be attached to agree the cycle provision.
- 10.64 No neighbour comments or objections have been received on the grounds that the proposed development would lead to increased parking pressures within the vicinity.
- 11.65 Transport for London have been consulted and have raised no objections subject to a greater number of Sheffield cycle spaces. The Greater London Authority has also commented in its Stage 1 comments that the proposed cycle storage amount and car parking facilities are of an acceptable level. Although clarification is required on the visitor spaces. The applicant has provided a Travel Plan with the application which is welcomed. A condition will be attached to require the appointment of a Travel Plan Co-ordinator prior to occupation with the aim of encourage sustainable methods of transport for occupiers and visitors. The Travel Plan will also be required by condition and be reviewed annually for a period of five years following occupancy.
- 11.66 The Highways Officer has requested highways contributions for improvements required and related to the increase in residents in this particular location. These would need to be directly related to the development and it has been stated that the following are required: carriageway works to Sunrise Avenue (£64,525), footway improvements in the vicinity of the site (£35,000) and street light enhancement in the vicinity of the site (£15,000). Therefore a contribution of up to £114,525 is recommended. The Local Highway Authority has raised no objection subject to the applicant entering into a Legal Agreement to secure these sums. Subject to the completion of this agreement and the attached planning conditions, the proposal would be acceptable in highway terms and it is not considered that the proposed development would result in parking or highway safety issues. The legal agreement would also be consistent with the other residential developments within this area.
- 10.67 The application proposes an Underground Refuse System (URS) around the perimeter of the buildings, outside the gated communal area. This system is in keeping with the London Borough of Havering's future aspirations for sustainable methods for refuse in the Borough. The refuse containers will have

capacity for 5000L and there will be 12 at the edges of the site. In addition, for large goods there will be a refuse storage area at Block B. However given the proposed end users officers are concerned that some residents may find it difficult to carry their refuse the proposed distances out of their buildings.

- 10.68 Therefore, officers have requested that some refuse facilities are provided inside the compound also for those unable to make the walk. This will be secured via condition for the submission of the Management Plan. This will ensure the details for how this will be managed are brought forward for review by officers. Lastly, a Construction Management Plan condition is recommended to be attached to ensure neighbouring amenity is safeguarded and the highway network is not prejudiced.

Sustainability

- 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 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 To demonstrate viability the appraisal highlights that at this stage a 38% carbon reduction can be achieved on average across the whole development through the improvements to fabric efficiency, energy reduction, 337 Photovoltaic panels, an air source pump, a brown and green roof and other renewable energy. The GLA have commented that the applicant's approach is acceptable and compliant with policy. The remaining regulated carbon dioxide emission reductions should be met through a Section 106 contribution to the Council's offset fund in order to meet the zero carbon target. In light of this, officers will secure the remaining 62% by S106 off site contributions charged at £60 per tonne.

10.75 Policy 5.3 of the London Plan seeks that developers utilise the highest standards of sustainable design and construction to be achieved to improve the environmental performance of new developments. Guidance of how to meet the requirements as presented from the above policy is further discussed within SPD Sustainable Design Construction (2009). This encourages developers to consider measures beyond the policy minimum and centred around development ratings, material choice, energy and water consumption. 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 development incorporates a large sustainable green/brown roof that would be inset with the PV panels at roof level. This would mitigate water runoff and sewer overflow by absorbing and filtering water that would normally be directed to gutters, increasing volume during wet weather. The green roof will also add to a greener air flow in the location by removing air particulates and producing oxygen.

- 10.77 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.
- 10.78 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

- 10.79 Guidance under the NPPF seeks to safely manage residual risk including by emergency planning and give priority to the use of sustainable drainage systems.
- 10.80 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.
- 10.81 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.

- 10.82 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.
- 10.83 The application site is located approximately 90 metres away from the nearest river. In terms of flooding, the site falls under Flood Zone 1. The Council's drainage and flood officer has been consulted as well as the Environment Agency. The drainage officer has confirmed that the submitted details are acceptable subject to conditions while the Environment Agency Officer has stated that given the distance of the site from the nearest river and its flood status, there are no objections. Therefore subject to conditions the proposal is acceptable.
- 10.84 Foul water will discharge via a dedicated below ground sewer network and connected into the existing public sewer system. Surface water is also proposed to be discharged into existing sewers. Policy 5.13 of the London Plan states that developments should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so and applicants should aim for greenfield run-off rates. The applicant makes provision for SUDs through the use of and brown green roofs as well as large areas for attenuation. Final details would be secured via condition.

Community Infrastructure Levy

- 10.85 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 15,354 square metres. Therefore a mayoral levy of £383,850 is applicable, subject to any relief for social housing.
- 10.86 The London Borough of Havering's CIL was adopted in September 2019. As the proposed floor area for the development is 15,354sqm and the CIL charging schedule applies a charge of £125 per sqm to any development in Zone A (any development north of the A1306). Therefore the applicable levy is £1,919,250 but this would be subject to relief for social housing.

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 From a sustainability perspective, the proposal is accompanied by a Sustainability Statement and Energy Statement. The reports outline an onsite reduction in carbon emissions by 38%, to include a photovoltaic strategy which aims to further reduce CO2 emissions across the entire site. As the requirements are for 100% reduction, this would result in a shortfall of 68%. Therefore the Mayors calculation of a financial contribution of £60 per tonne in lieu of on-site carbon reduction measures is applicable. In the event of an approval and in compliance with the hereby attached conditions a final sum will be calculated. The mechanism for this will be secured via a S106 legal agreement in accordance with Policy 5.2 of the London Plan.
- 11.3 In light of the above and discussions in other parts of this report the proposal would attract some necessary section 106 provisions to mitigate the impact of the development on the wider infrastructure within the Borough.

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.

EQUALITIES AND DIVERSITY

- 13.1 Section 149 of the Equality Act 2010, which came into force on 5th April 2011, imposes important duties on public authorities in the exercise of their functions, including a duty to have regard to the need to:
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 13.2 For the purposes of this obligation the term “protected characteristic” includes:- age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 13.3 The existing site is used for the housing of over 55s. Therefore this group would be disproportionately disadvantaged by the scheme. As such age under the protected characteristic list would be relevant to the development. However the proposed development comes forward with full details provided. Therefore officers have been able to make a complete assessment.
- 13.4 The development proposes to reprovide all the existing elderly resident units on site (55) and all existing tenants would have a right to return once the development is completed. In fact, the development specifically focuses on the improvement of existing housing for the over 55 age group by resulting in a secure gated provision for the over 55s community. Wheelchair access into the units and step-free pedestrian access is also proposed. Therefore officer consider that there would be no communities falling under the list of “protected characteristics” that would be significantly or unduly harmed by the proposals.
- 13.5 Therefore in recommending the application for approval, officers have had regard to the requirements of the aforementioned section and Act and have concluded that a decision to grant planning permission for this proposed development will comply with the Council’s statutory duty under this important legislation.
- 13.6 In light of the above, the proposals are considered to be in accordance with national regional and local policy by establishing an inclusive design and providing an environment which is accessible to all.

CONCLUSIONS

- 14.1 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.
- 14.2 The preliminary proposals for the site were subject to consideration by the Quality Review Panel and Strategic Planning Committee and comments made in these forums have had some input into the development. The proposal would not adversely affect the amenities of existing neighbouring residential properties. It would provide for much needed quality housing to meet the demand for over 55s, including 134 affordable units, all with a good standard of accommodation including space standards, outlook, privacy and access to daylight and sunlight. Due consideration has also been given to any impact on equalities and diversity.
- 14.3 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 and the London Plan.
- 14.4 The design of the development is considered appropriate for its location, which also provides for a good level of variety and legibility in the built form. The materials, layout and buildings relate well to the surrounding area resulting in a development that would be aesthetically pleasing subject to conditions securing detailed material elements of suitable quality.
- 14.5 In light of the above, the application is **RECOMMENDED FOR APPROVAL** in accordance with the resolutions and subject to the attached conditions and completion of a legal agreement.