



Application Reference:	P0883.20
Location:	HAVERING COLLEGE OF FURTHER AND HIGHER EDUCATION TRING GARDENS
Ward	GOOSHAYS
Description:	DEMOLITION OF EXISTING BUILDINGS AND REDEVELOPMENT OF THE SITE TO PROVIDE 120 RESIDENTIAL DWELLINGS COMPRISING 78 HOUSES AND 42 FLATS(1BED X 12, 2BED X 53, 3BED X 55) WITH ASSOCIATED CAR PARKING, LANDSCAPING, OPEN SPACE, PLAY SPACE AND INFRASTRUCTURE.
Case Officer:	RAPHAEL ADENEGAN
Reason for Report to Committee:	<ul style="list-style-type: none">• The application site is under the ownership of the Council and is a significant development.

1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 1.1 The application site is identified as a 'Major Developed Site' in the Council's Core Strategy. Policy DC46 states that when determining planning applications on these sites and that in the event of complete or partial redevelopment, the Council will seek proposals for residential use or community use, subject to relevant policies in the Plan. There are no in principle objections to the proposals and through the application of conditions and a legal agreement officers are able to secure a good level of design and the use of high quality materials.
- 1.2 This report concerns a detailed planning application for the redevelopment of the site to provide 120 dwellings units in buildings extending to between 2 and 3.5 storeys in height together with associated car and cycle parking, hard and soft landscaping, open space, play space and infrastructure works involving demolition of existing building and structures.

- 1.3 The site is currently occupied by Havering College of Further and Higher Education buildings depicting the era that they were constructed with a mismatch of buildings and structures. Officers consider that the proposal would protect the natural and built environment in accordance with the principles of sustainable development and meet an identified housing need.
- 1.4 The proposed development would secure the provision of onsite affordable housing. Overall, the number of units proposed would positively add to the Council's housing delivery targets.
- 1.5 The proposed redevelopment of the site would result in a modern, contemporary design that responds positively to the local context, and would provide appropriate living conditions which would be accessible for all future occupiers of the development.
- 1.6 The principal planning considerations arising from the proposals are the acceptability of the redevelopment of this Green Belt site in principle and its impact upon the Green Belt, the impact of the proposals in terms of design, layout, scale and appearance, landscaping proposals, environmental implications, affordable housing, mix and tenure, parking and highway issues, the impact on local amenity and on community infrastructure.
- 1.7 The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2019), the policies of The London Plan (2021), Havering's Core Strategy and Development Control Policies Development Plan Document (2008) the emerging Local Plan, as well as to all relevant material considerations including the responses to consultation.

2 RECOMMENDATION

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

1. agree the reasons for approval as set out in this report, and
2. delegate authority to the Assistant Director Planning in consultation with the Director of Legal Services for the issue of the planning permission and subject to minor amendments to the conditions or the legal agreement. The Section 106 Agreement Heads of Terms would cover the following matters:

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

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

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

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

47 units / 198 habitable room.

Early Review Mechanism if not implemented within 2 years.

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

ii. **Sports Pitch Contribution**

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

iii. **Open Space for Public Use**

Provision and retention of public open space, including maintenance

iv. **Employment and Training**

The developer to submit to the Council for approval, prior to commencement of the development, a Training and Recruitment Plan. The developer to implement the agreed Plan;

The developer to use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development.

v. **Transport and Highways**

Submission of Travel Plans. The full travel plan should include car and cycle parking monitoring.

A travel plan bond of £10,000 will be required to be used by the Council to remedy any failure to comply with the terms of the approved travel plan.

Payment of a Travel Plan Monitoring Fee of £5,000 for the purposes of monitoring the operation and effectiveness of the travel plan.

The developer to ensure the effective implementation, monitoring and management of the travel plan for the site.

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

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

vi. **Carbon Offset**

Provision of actual carbon emissions and payment of any additional contribution if the on-site carbon reductions stated in the strategy are not achieved - carbon offsetting payment in accordance with Policy SI 2 of the London Plan:
Contribution of £201,609 towards carbon reduction programmes within the Borough, duly Indexed.

vii. **Legal Costs, Administration and Monitoring**

A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation and a further financial obligation (to be agreed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms.

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

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

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

Conditions

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

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

Informatives

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

3 SITE AND SURROUNDINGS

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

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

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

4 PROPOSAL

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

78 residential houses comprising of

Market

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

Affordable – Social Rent

- 18 x 3 bed house

Affordable – Shared Ownership

- 1 x 2 bed house

42 residential apartments comprising of

Market

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

Affordable – Social Rent

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

Affordable – Shared Ownership

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

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

Overall site

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

5 PLANNING HISTORY

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

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

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

Pre-Application Discussion

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

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

Summary of QRP Comments and Response from Applicant

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

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

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

Summary of SPC Comments and Response from Applicant

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

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

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

Community and Stakeholder Engagement

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

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

6 CONSULTATION RESPONSE

6.1 Statutory and Non Statutory Consultation

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

LBH Highways –

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

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

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

Officer comment: Noted and appropriate S106 clause and informatives suggested.

LBH Education – All Local Authorities including Havering have a statutory duty to ensure that there are enough school places available in the borough to accommodate all children who live in the borough and might require one. The increase in demand for school places has meant that in some areas of Havering the demand for places is higher than the number of places available. We have already consulted on and successfully implemented expansions at several schools in the borough through three phases of our Primary Expansion Programme. However, due to the sustained and increasing demand for school places, further permanent expansion of our schools and new schools proposals are required.

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

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

- Early Years – 28

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

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

Officer Comment: Suggested condition is included

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

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

Officer comment: Noted and appropriate condition and informatives suggested.

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

Officer comment: Noted and appropriate condition and informatives suggested.

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

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

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

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

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

LBH Park Development – No comment has been received.

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

Officer comment: Noted and appropriate condition and informative suggested.

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

National Grid Cadent – There is apparatus in the vicinity of application site which may be affected by the activities specified. The applicant must ensure that proposed works do not infringe on Cadent's legal rights and any details of such restriction should be obtained from the landowner in the first instance.

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

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

Officer comment: Noted and appropriate condition and informatives suggested.

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

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

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

London Borough of Redbridge – No comment received.

EDF Energy (Network PLC) – No comment received.

Anglian Water Authority – No comment received.

NHS – No comment received.

7 COMMUNITY ENGAGEMENT

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

8 LOCAL REPRESENTATION

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

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

Representations

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

Objections

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

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

Comment with condition

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

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

9 Relevant Policies

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

National Planning Policy Framework (2019)

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

Themes relevant to this proposal are:

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

London Plan 2021

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

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

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

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

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

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

Play and Informal Recreation SPG (2012)

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

Sustainable Design and Construction (2014)

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

Character and Context SPG (2014)

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

Housing SPG (2016)

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

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

Accessible London SPG

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

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

The following policies are considered relevant to the proposed development:

- CP1 - Housing Supply
- CP2 - Sustainable Communities

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

Havering Draft Local Plan (2018)

The following policies should inform design of the proposed development:

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

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

Havering Supplementary Planning Documents (SPDs)

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

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

10 **MATERIAL PLANNING CONSIDERATIONS**

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

- Principle of Development
- Affordable Housing
- Housing Density and Unit Mix
- Design, Character and Appearance of the Area/Heritage Assets
- Residential Amenity
- Traffic, Safety and Parking
- Flood Risk and Development
- Accessibility
- Sustainability
- Air Quality
- Environmental Impact Assessment
- Statement of Community Involvement
- Archaeology
- Ecology and Biodiversity
- Planning Obligations

10.2 **Principle of Development**

10.2.1 LDF Policy DC46 is specific to the application site, identifying the Havering College, Quarles Campus site as a Major Developed Site in the Green Belt where Green Belt assessment criteria should be used and where “in the event of complete or partial redevelopment the Council will seek proposals for residential or community use, subject to relevant policies in the Plan.” The concept of designated major development sites promoted by PPG2 (Green Belts) has been removed by the NPPF. However, para 145 of the NPPF identifies that one of the exceptions to the general presumption against inappropriate development in the Green Belt is in relation to “partial or complete redevelopment of previously developed sites....which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.” LDF Policy DC46 can therefore be upheld as remaining in line with National Policy on the Green Belt.

Loss of Education facility

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

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

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

Loss of Sports Pitches

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

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

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

Green Belt

10.2.13 The application site is located within the Metropolitan Green Belt where great importance is attached at local, regional and national level to the original aims of preventing urban sprawl by keeping land permanently open and protecting the essential characteristics of openness and permanence.

10.2.14 Paragraph 143 of the National Planning Policy Framework (the NPPF) states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The NPPF indicates at paragraph 145 that the construction of new buildings should be regarded as inappropriate in the Green Belt unless they fall within certain specified exceptions including *"limited infilling or the partial or complete redevelopment of previously developed land, whether in redundant or continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development; or not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority"*. Whilst this exception is not reflected in the adopted development plan (LDF 2008), it represents up to date Government policy and is therefore a material consideration that carries substantial weight.

10.2.15 However, as set out above, the partial or complete redevelopment of previously developed sites could be considered appropriate development in the Green Belt if it would not have a greater impact upon the openness of the Green Belt and does not undermine the purpose of the site's inclusion in the Green Belt. On the other hand, if it were to be concluded that the proposals would have a greater impact on openness or result in some other harm to the purpose of including the site in the Green Belt, then very special circumstances would have to be demonstrated which clearly outweighed such harm. The impact upon the openness of the site, implicitly intertwined with the visual impact of the proposals, is therefore a key consideration to determining the acceptability of the proposals in Green Belt terms.

10.2.16 The applicant has undertaken an assessment of the impact of the development on openness based upon the built form within the Green Belt – the quantum (footprint and volume) and spread of development (development envelope), comparing the development proposals against the existing college layout, its buildings and hard surfaces. The layout approach with parameter plans defining matters such as

development envelopes, building heights, open space and movement is considered to lend itself to analysis of this nature. However, members should be aware that there is no definition of “openness” contained within the NPPF nor are there any criteria within policy or guidance relating to the assessment of a development upon it. A degree of subjective judgement therefore remains however well quantified the comparisons are.

- 10.2.17 It is apparent, however, that two conditions must be met in order for development to meet the specified exception. Proposals must not *“have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development or not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority”*. These tests are considered below.

Impact on Openness

- 10.2.18 It is necessary to consider whether the proposed development would have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Paragraph 133 of the NPPF highlights *“the essential characteristics of Green Belts are their openness and their permanence”*. There is no definition of openness in the NPPF but, in the context of the Green Belt, it is generally held to refer to freedom from, or the absence of, development. Any above ground development would to some extent diminish the openness of the Green Belt.
- 10.2.19 The National Planning Practice Guidance (NPPG) (Paragraph: 001 Reference ID: 64-001-20190722) sets out that, *“assessing the impact of a proposal on the openness of the Green Belt, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:*
- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
 - *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
 - *the degree of activity likely to be generated, such as traffic generation.”*
- 10.2.120 The application site is characterised predominantly by three-storey building centrally located with single-storey building mainly located to the north and south of the site. The whole of the buildings and structures on site are to be demolished. The proposed development would introduce buildings between two and three and a half storeys in height.
- 10.2.21 The accompanying Landscape and Visual Impact Appraisal (LVIA) identifies a series of receptors that will be affected, to varying degrees, by the change of the site as a result of the development. The existing buildings on site are already very visible from the immediate residential surrounds and the LVIA, however, beyond this there are only limited views and glimpses of the site possible through breaks in the trees. The site is visible from within Hatter’s Wood but in the context of tree coverage from within

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

- 10.2.22 The LVIA shows when viewed from the other nearby receptors, the development will not compromise visual openness at all nor will it affect the sense of openness when viewed from medium or long distance receptors. The document shows there will be an impact on the sense of visual openness from the residential properties along Tring Gardens, Tring Walk, Tring Close and a section of Priory Close as a result of the increase in built form at the frontage of the site and also to the east where there isn't currently built development. The perception would be of a dispersed and substantially built-up site with reduced openness.
- 10.2.23 The scheme has reduced through pre-application discussions, as a result of both design and Green Belt considerations. The proposal would result in a 14% increase in built form from 35,971m³ to 41,162m³, resulting in an increase in built volume of 5,191m³. The existing built footprint on the site is 5,837sqm and the proposed is 4,998sqm showing a reduction of 839sqm (14%) and the amount of built form and hardsurfacing across the site also decreases from 18,254sqm to 12,995sqm, a reduction of 5,259sqm (29%). However, the new buildings would have a combined floor area of approximately 9,854sq.m (currently 8,600sq.m) an increase of 13%. Although there will be an increased amount of landscaped and open areas of 5,028sqm (27%), both the floor area and volume of the proposal are considered to be significant in the context of the Green belt settings of the application site.
- 10.2.24 Notwithstanding the above, it is acknowledged that openness goes beyond physical presence and that the visual sense of openness is a qualitative judgement pertaining to the whole, including disposition of buildings, footprint, height, bulk, mass, roofscape, landscape and topography. Officers are of the view that whilst the reduction in the area of hard surfacing including car park would have a beneficial effect upon openness of the Green Belt, the benefits would not outweigh the harm the proposal in its totality would have to the openness of the Green Belt. It is considered that the massing and dispersal of the proposed buildings would result in an increase in the built up appearance of the site, particularly when viewed from the open land to the north and east, resulting in a reduction in the openness of the Green Belt, and as such considered to be inappropriate development, which should not be approved except where a case of very special circumstances exists.

Very Special Circumstances (VSC)

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

Significant Education Benefits

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

Officer comment – This is given limited weight.

Provision of New Housing –

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

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

and;

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

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

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

Provision of Affordable Housing

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

Officer comment – This is given substantial weight.

Deliverability

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

Officer comment – This is given substantial weight.

Provision of Public Open Space

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

Officer comment – This is given substantial weight.

Conclusion

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

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

- 10.2.41 In balancing the public benefit of this proposal, this is considered to be twofold. Firstly the benefit of delivering much needed affordable housing is considered to be a public benefit. The scheme as discussed above, would despite a deficit, deliver 39% affordable housing, which Officers consider a significant public benefit, in light of the fact that a number of schemes recently approved having not achieved the minimum 35% required by the London Plan due to site viability. Secondly, the public access to the site is also considered to be of some public benefit. It is considered that the delivery of significant affordable housing on this site, the design of the proposed buildings reflective of the prevailing building design in the area, on balance outweighs the harm to the Green Belt. In light of this justified public benefit, the proposal would give to no conflict with the guidance set out in the above policies.
- 10.2.42 Furthermore, in balance, the proposal results in a reduction of hardstanding and building footprint and the degree of loss of openness is not as much as could be the case for a site in a countryside setting or with previously developed land which was originally associated with a green belt use (e.g. former agricultural buildings).
- 10.2.43 Based on the forgoing and having regard to the fact that there is no presumption against the loss of education facility and training building, the NPPF presumption in favour of sustainable development, the weight accorded the very special circumstances case put forward in support of the application and taking into consideration that the site is regarded as previously developed land, the proposed residential led redevelopment of the site is considered to be acceptable within this Green Belt site. On this basis, the proposal is considered to be acceptable in principle with regard to the above stated policies.
- 10.2.44 Notwithstanding the acceptability of the principle, the proposal would be subject to all other material planning considerations, in particular, harm that will be caused to the character of its locality, which are explored further in the report below.

10.3 **Affordable Housing**

- 10.3.1 Policy H4 of the London Plan seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy DC6 of the LDF states that the Council will aim to achieve 50% of all new homes as affordable and will seek a tenure split of 70:30 between social housing and intermediate forms and the emerging Local Plan Policy 4 seeks at least 35% affordable housing based on habitable rooms and tenure split of 70:30 in favour of social rent. Policy H6 of the London Plan has at least 30% low cost rent (social rent or affordable rent), at least 30% intermediate (London Living Rent or shared ownership) and the remaining 40% as determined by the local planning authority. On the public sector land status of the site, policy H5 state that where there is no portfolio agreement with the Mayor, a minimum of 50% affordable housing by habitable room, must be provided to be eligible for the Fast Track Route (FTR).
- 10.3.2 Supplemental to the above policies the Mayor has produced Homes for Londoners – Affordable Housing and Viability SPG which aims to provide guidance on ways to speed up planning decisions and increase the amount of affordable housing

delivered through the planning system. The SPG sets out the different threshold approach to viability appraisals. The first of which is the 'fast track route' (Route B) in which if the scheme delivers at least 50% of affordable housing and meets the specified tenure mix and other requirements and obligations, are not required to submit viability information. Schemes that do not provide 50 per cent affordable housing will be considered under the Viability Tested Route (Route A). The 50% of a scheme as affordable housing is based on habitable rooms. Under both Routes an early review mechanism will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted. A further late (near end of development) review would also apply in the case of proposals coming forward under Route A, which is applied once 75% of units are sold. Where a surplus profit is identified this should be split 60/40 between the LPA and developer and should be in the form of contributions towards off site affordable housing provision. This would need to be secured legally through the section 106 agreement, which should also set out an agreed Benchmark Land Value that would form the basis for a comparison should an early review be triggered.

Appraisal

- 10.3.3 The applicant has submitted a financial viability appraisal for the development site, which is based on the provision of 37.3% affordable housing of the 120 housing units, based on 198 habitable rooms (39.2% in terms of unit numbers). This is broken down as 32 affordable rent units and 15 shared ownership units.
- 10.3.4 The viability submitted for the 35% affordable housing scheme shows that based on the assumptions made in terms of the gross development value and the cost of the development, the residual land value when taking into consideration the benchmark value of the existing land would generate a deficit of £287,000. The Council tendered an external review of the viability of the altered scheme inputting our private residential values which results in a surplus of c £40,000. This represents 0.1% of overall Gross Development Value, given the low nature of this surplus the scheme is considered to be at breakeven and consider the 35% provision reasonable.
- 10.3.5 Whilst the overall percentage of affordable housing would not be policy compliant (Borough target of 50% affordable housing in line with Policy H6 of the London Plan), it is considered that as the scheme would not fall under Route B of the Mayors SPG, a late review mechanism would be required in this instance, as per the requirements of the Mayors Affordable Housing and Viability SPG. And whilst 35% has been shown to be the viability position, the tenure mix of 72/28 per cent in favour of social rent and the provision of 18 x 3 bed units (47.7%) of the 47 affordable units as affordable rent demonstrate that the proposed tenure split is the maximum reasonable level that can be delivered on this site.

Conclusion

- 10.3.6 Officers acknowledge that the level of affordable provision is below the threshold for a public land, officers are satisfied that when considered as a whole, and in the context of the scheme's viability and NPPF guidance, which seeks to ensure schemes deliver the maximum reasonable amount of affordable housing yet remain deliverable, the subject application would accord with key policy objectives in

relation to affordable housing provision. Furthermore, the total of affordable would be secured by a section 106 agreement.

- 10.3.7 Based on the above factors, it is considered that the development would accord with relevant national, London and local policies and the Mayor's SPG..

10.4 **Housing Density and Unit Mix**

- 10.4.1 London Plan policy 3.8 require new development to provide a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups. London Plan Policy D2 states that the density of development proposals should be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services).

Density

- 10.4.2 The site is considered to be within a suburban Location and moderate Public Transport Accessibility Level (PTAL) of 1-2.
- 10.4.3 The London Housing SPG sets out at Table 3.2 appropriate densities for various different areas. Table 3.2 sets out that a density of 50-95 units per hectare and 150-250 habitable rooms per hectare would be most appropriate for this site in suburban areas with a PTAL rating of up to 3. Policy DC2 of the Local Plan provides for a density range of 30-50 dwellings per hectare for the suburban area of Harold Hill. The emerging Local Plan states that densities should be in accordance with the density matrix set out in the London Plan, however, recognises that density is only one of a number of considerations. This is reflected in the London Plan which removes the density matrix but focuses on optimising site density in Policy D3.
- 10.4.4 The development proposes a density of 32 u/ha or 139 hr/ha. However, the proposed development will provide a 1.4 hectare public open space. After excluding this area from the density calculation, this proposed density equates to 50 dwellings per hectare or 221 hr/ha. Notwithstanding the method used, the proposed development falls within the recommended density range for a sub-urban site such as this with a PTAL rating of 2-3. However, as noted above, the matrix is only the starting point for considering the density of development proposals provided that the development will not have an adverse impact on the character of the surrounding area and satisfy the design policies of the Plan. This is also supported in Policy D6 of the London Plan which sets housing quality and standards.
- 10.4.4 Notwithstanding the ensuing density of 50 dwellings per hectare, it is considered that the level of open space around the built form is commensurate to the level of accommodation and size of the land in the context of its location and character of the area, and as such is not considered to be an overdevelopment of the site nor result in a detrimental effect on the character of the area. The proposals comprise a high quality design which makes efficient use of the site in line with the NPPF, whilst respecting its Green Belt designation as required. The proposal would comply with the other material considerations and these are discussed further in the report below.

Unit Mix

10.4.5 The NPPF (2019) seeks to steer development to deliver a wider choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Policy H10 of the London Plan encourages new developments offer in a range of housing mix choices. The above policy stance is to allow Londoners a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.

10.4.6 Policy DC2 sets out an indicative mix for market housing of 24% 1 bedroom units, 41% 2 bedroom units, and 34% 3 bedroom units. DC6 states that in determining the mix of affordable housing, regard should be paid to the latest Housing Needs Survey. The Council's Housing Strategy (2014) which was informed by an extensive Housing Needs and Demands Assessment (2012) suggested that 75% of the rented provision should be one or two bedroom accommodation and 25% three or four bedrooms and for intermediate options, a recommended split of 40:40:20 for one, two and three bedroom accommodation. The emerging Local Plan Policy 5 states that 'the Council will support development proposals that provide a mix of dwelling types, sizes and tenures. All housing schemes should include a proportion of family sized homes and reflect the recommended housing mix identified in the table below:

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

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

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

	60.8%	39.2%		
--	-------	-------	--	--

- 10.4.8 The supporting text to London Plan Policy H10 notes that *“the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.” “the need for additional family housing and the role of one and two bed units in freeing up existing family housing.”* The majority of the units proposed are two and three bed, which on balance, provides the required mix in this location. One bed and two bed 3person units will be suitable for first time buyers and couples. The two bed 4person units are also suitable for young families as recognised in the London Plan. As such, it is considered that the units mix would be appropriate and would accord with development plan policies.

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

Policy Context

- 10.5.1 The NPPF 2019 attaches great importance to the design of the built environment. Paragraph 124 states *‘The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.*
- 10.5.2 The NPPF states (paragraph 130) that ‘permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents’. Paragraph 129 states that ‘applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community’ and this is reinforced in London Plan Policy D2, which seeks the involvement of local communities and stakeholders in the planning of large developments.
- 10.5.3 Policies D3 and D4 of the London Plan require that buildings, streets and open spaces should provide a high quality design response that has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion, appearance, shape and form
- 10.5.4 Core Strategy policy CP17 states that new development to ‘maintain or improve the character and appearance of the local area in its scale and design’. Core Strategy policy DC61 states that ‘Planning permission will only be granted for development which maintains, enhances or improves the character and appearance of the local area. Development must therefore: respond to distinctive local building forms and patterns of development and respect the scale, massing and height of the surrounding physical context.’

Scale

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

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

Layout

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

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

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

Design and Appearance

- 10.5.14 In terms of the appearance of the development, the proposal seeks to use a high quality brick finish to the building throughout. The proposed window reveals, external balconies would provide articulation to the façade of the buildings, helping the building to achieve its own identity in an area which is characterised by a varied pattern of development. The use of simple recessed modelling to the façade would add further articulation to the building's appearance and help delineate each of the apartments.
- 10.5.15 The proposed buildings have been designed to achieve an architectural cohesion with the immediate surroundings and other architectural influences of traditional flat fronted building with pitched roofs. The appearance would be tradition yet modern and the palette of materials (which would be secured by condition) would seek to complement the nearby buildings, but at the same time establish their own character in the suburban environment. The palette of external materials would be controlled by way of an appropriate condition.
- 10.5.16 The proposal takes cues from the form and layout of housing in the surrounding area, and is now more suburban in character. Officer comments on enhanced quality contemporary detailing have been addressed, such as minimising unsightly fascia boards at roof/wall junctions, and the proportion/alignment of windows. A softer palette of materials has been introduced to improve the way the scheme integrates with neighbouring houses. Overall, it is considered that the traditional yet modern design and appearance of the development would make a positive contribution to the wider suburban environment.

Landscaping and the Public Realm

- 10.5.17 Policy DC61 requires that new development must harness the topographical and ecological character of the site, including the retention of existing trees and landscape. Policy DC71 seeks to protect and enhance views to and from historic parks and landscapes, including the adjacent Hatters Wood and Dagnam Park
- 10.5.18 Policy DC21 requires major new residential development to include provision for adequate open space, recreation and leisure facilities.
- 10.5.19 Policy DC20 sets standards for the provision of public open space and children's play space which is also covered by Policy G4 of the London Plan supplemented by the Mayor's "Shaping Neighbourhoods: Play and Recreation SPG (2012).
- 10.5.20 The proposal is supported with a landscape strategy and indicative landscape plan for the site. The scheme before the LPA has been subject to a number of pre-applications discussions and revisions prior to the agreement in principle over the final approach.
- 10.5.21 Due to the sensitive nature of this site and its Green Belt location, the landscaped verdant setting of the scheme has been one key driving factor of the development proposals. The landscaping proposals form a key part of the proposed layout of the development and also respond to the existing layout of the site through the creation of green corridor which runs southeast-northeast, improving and continuing the open space established by the existing buildings. The development comprises two main areas, the area of new homes and the large open space bounded by Hatters Wood that will incorporate a new public park. A central 'green link' from Tring Gardens leads into the new park through the residential area, integrating these two areas.
- 10.5.22 The proposed development illustrates 'buildings within the landscape' comprising existing mature and new enhance planting. A park/open space is proposed as a feature covering the entire width of the site along the northern and eastern part of the site, which is visible from Trings Grdens from the 'green link' through the centre of the site enhancing the setting of the new buildings facing onto Tring Gardens. Aspects such as the removal of the existing boundary railings and hedges will serve to open up views and public access to the site which will make a notable positive impact on the visual openness of the site. This will be of particular note along the frontage of the site where a 50m by 16m wide linear central park/open space would be created.
- 10.5.23 The rear gardens located to the rear of the ground floor flats in the apartment blocks would provide private gardens for the residents of the flats. This area would be enclosed by the close boarded fence . The main planting area around the perimeter of the buildings would in form of raised planters which would serve as dual purpose in creating a soft/ green landscaped corridor with low level shrub planting and to also provide a defensible area between the proposed public realm and the ground floor units. Ground level planting is proposed along the building envelopes of the apartment blocks, to the front and corner of houses. The main central open space would be laid to lawn to provide informal play area and would include some play elements.

- 10.5.24 The layout arrangement of buildings will provide views in all directions of both public and private significant landscape features included across the site and beyond into the open green, buffer land, swales, courtyard and trees/planting. Wide landscape corridors and rear landscaped gardens will create separation between the adjacent Hatters Wood and Dagnam Park and adjoining residential properties providing high quality public open space including children's play space.
- 10.5.25 Much emphasis has been placed upon the retention of existing trees and vegetation. An Arboricultural Impact Assessment accompanied the application which identified and classified every tree on the site according to its health and amenity value. The majority of existing trees on the site are proposed to be retained, but the proposed design would have an impact on 24 trees, 4 hedges and 1 area of shrubs/scrub whose removal is required to accommodate the proposed layout, and the part removal of 2 groups of trees. The removal of the trees is adequately compensated through the planting of a significant number of new trees, shrubs and hedges as part of the landscape strategy. Officers are satisfied that the approach to tree retention and planting is acceptable and can be properly controlled through the use of appropriate conditions.
- 10.5.26 The proposals have been rationalised to minimise the impact of high levels of parking and incorporate SUDS infrastructure. A high quality green space is created to the north of the site, and the design negotiated improved the way the proposed housing integrates along this edge. The landscaping proposals have been extensively reviewed by officers, who supports the proposals subject condition(s) being imposed, and therefore acceptable with respect to arboricultural impacts.in accordance with Policy DC60 of the LDF.
- 10.5.27 The strategy for play space has been developed in line with the Mayor's "Shaping Neighbourhoods: Play and Recreation" SPG (2012) and indicates the provision of one Local Equipped Area of Play (LEAP), 2no. Local Areas of Play (LAP), 2 no. Door Step LAPs and a Youth Space

Refuse (waste management)

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

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

- 10.5.29 According to the Council's 'Waste Management Practice Planning Guidance for Architects and Developers', this type of development would incorporate a minimum storage capacity of 45 litres for recycling and 180 litres for general refuse (rubbish) per dwelling. An 1100 litre bin would be required for recyclable waste and an 1100 litre metal / plastic bin would be required for residual waste for every twenty-four flats and eight flats respectively. Based on this Code of Practice, the development would require the following amount of bins to serve the size of development being proposed:

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

- 10.5.30 There will be an over provision by one bin for each of the block.
- 10.5.31 According the submitted Planning Statement, the bin requirements have been double to account for fortnightly collections. Residents' carry distances are up to a maximum of 30m horizontally to refuse and recycling stores and the drag distance within the 25m maximum required from refuse storage to refuse vehicle collection in compliance with Council standards.
- 10.5.32 In terms of layout and appearance of the refuse stores, these appear to broadly work. The blocks of apartments have integrated refuse stores at ground floor level. Therefore the refuse stores would have adequate capacity to store the size of bins needed. Notwithstanding, the Council's Waste & Recycle Team has raised no objection. As such, subject to the imposition of the applicable condition, it is considered that the location and provision of refuse stores would be compliant with the above stated policies.

Solar Panels

- 10.5.33 The applicant is proposing to install solar panels onto all flat roof area across the site. These are unlikely to be perceptible at street level as such panels would be set in from the roof edges. While the submitted roof layout and elevation plans do not show the solar panels, it is considered that the proposed solar panels would not have adverse impact upon the character of the area or the appearance of the completed development taking into account the height and setting of the proposed building.

Conclusion

- 10.5.34 In conclusion, the proposed development would provide a high quality development on the site which would appropriately address the public realm. The layout, scale, height and massing is commensurate with the existing and local character. It is considered that the development proposal would be appropriate and would accord with the NPPF and listed policies above..

10.6 **Residential Amenity**

Residential Amenity for Future Occupiers

- 10.6.1 Policy D6 of The London Plan requires all new residential development to provide, amongst other things, accommodation which is adequate to meet people's needs. In this regard, minimum gross internal areas (GIA) are required for different types of accommodation, and new residential accommodation should have a layout that provides a functional space. Table 3.3 of The London Plan specifies minimum GIAs for residential units and advises that these minimum sizes should be exceeded where possible. The policy also provides a commitment that the Mayor will issue guidance on implementation of the policy, and this commitment is fulfilled by the publication of the Mayor's Housing SPG (2016). The SPG sets out detailed guidance on a range of matters relating to residential quality, incorporating the Secured by Design principles, and these form the basis for the assessment below.

Communal Space

- 10.6.2 The proposed Masterplan provides 1.4 ha of Open Space. The public open space to the rear of the development site would offer public access to the park. There is also a central linear park creating east west connection through the neighbourhood. The route through would be accessible for all users
- 10.6.3 Overall it is considered that the different forms of communal space being offered would be a benefit of the scheme and improving the environment of these properties. The space would benefit from high levels of natural surveillance and would be of dimensions/configuration that would lend itself to domestic recreational activities

Play Space

- 10.6.4 Policy S4 on 'Play and informal recreation' from the '*London Plan*' 2021 expresses that the Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well designed, secure and stimulating play and informal recreation provision. In terms of local plan policies, Policy DC3 on 'Housing Design and Layout' of LBH's '*Development Plan Document*' 2008 expresses that planning permission will only be granted if, in their design and access statements, developers demonstrate how they have addressed the policies in this plan which impact on the design and layout of new developments.
- 10.6.5 Based on the expected child population generated by the scheme and an assessment of future needs. Using the methodology within the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG, it is anticipated that there will be approximately 89.6 children within the development based on current housing mix. The guidance sets a benchmark of 10sq.m of useable child playspace to be provided per child, with under-5 year olds playspace provided on-site as a minimum. As such, a minimum of 896sq.m playspace is required within the application site boundaries.
- 10.6.6 The development proposals offer a variety of play and recreational opportunities within the new park, the central green link as well as incidental spaces around the site, which according to the supporting statement, is well in excess of the minimum requirement. Whilst the applicant has provided a landscape design and access statement which identifies children's playspace across the site, there is however, no area-by-area breakdown of playspace areas has been provided and the Landscape Strategy appears to indicate only three areas of playspace across the wider development.
- 10.6.7 The proposed play areas would be accommodated within the communal open space to provide secure safe environments for the younger children. Whilst there is lack of information on the exact sizes of the allocated play area, officers are of the view that there will be sufficient children play area within the development. This will however be secured by condition. As such, this aspect of the proposal complies with Policy S4 from the '*London Plan*' 2021 and the Mayors SPG on 'Shaping Neighbourhoods: Play and Informal Recreation' and Policy DC23 of Havering's '*Development Plan Document*' 2008.

Entrance and approach/ active frontages

- 10.6.8 The Mayor's Housing SPG calls for entrances to be visible from the public realm and clearly defined. All six blocks would have main entrance points from the main street frontage and would be visible in the public realm and of suitable size. Each residential block, would be served by single cores.
- 10.6.9 The ground floor of each of the residential blocks would overlook the communal residential areas so that these areas are activated. The houses will all have front entrance facing the communal area. Overall it is considered that the proposal would provide active frontages along all publically accessible spaces which would ensure natural surveillance and activity.

Shared circulation

- 10.6.10 The SPG sets out a number of guidelines for shared circulation space, which includes the numbers units that are accessed from each core (eight units); the provision of entry phone, or audio-visual verification to the access control system where applicable; natural light and adequate ventilation where possible.
- 10.6.11 The residential blocks would be served by a single core which would have access to a lift each of which would be wheelchair standard. Each core would serve two flats in line with that recommended in the SPG.

Dwelling space standards/ internal heights/ flexibility

- 10.6.12 The minimum space standards are set out at Table 3.3 of the London Plan and are reproduced within the SPG.
- 10.6.13 Policy D7 of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4 (2) – 'accessible and adopted dwellings'. The policy will require 10% of new housing to meeting building regulations M4 (3) – 'wheelchair user dwellings'. The accessibility requirement of the scheme is considered in detail elsewhere in this appraisal.
- 10.6.14 The proposed 2bed and 3bed units are all shown to exceed the minimum space standards and the proposed 1bed units would meet the minimum standards. The individual rooms within the flats are of good layout and size and suitable internal circulation space is provided in all units. In this respect the proposal is considered acceptable. The development would also achieve the minimum floor to ceiling height of 2.5 metres as required by the Housing SPG.
- 10.6.15 The SPG requires built in storage space to be provided in all new homes. The proposal is shown to provide an adequate level of storage space for each of the units. To ensure compliance with this standard, it is considered necessary to secure this as a condition of any planning permission.
- 10.6.16 The SPG also seeks adequate space and services to work from home. An indicative furniture layout is set out on the application drawings and this demonstrates that all of the flats would have space for a table. As such, each flat would have space flexible for dining and home study/work activities. This is also reflected in the layout of the 78 houses.

Private open space

- 10.6.21 The SPG requires a minimum of 5sqm per 1-2 person dwelling and an extra 1sqm for each additional occupant. Every flat, with the exception of those at ground level, which have access to private garden area, would have a private balcony space which would meet the required standard recommended in the SPG. The SPG also calls for a minimum depth and width of 1.5 metres for all balconies and other private open spaces. The proposed balconies would comply with these minimum dimensions.

Privacy

- 10.6.22 The SPG calls for habitable rooms within dwellings to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Paragraph 2.3.36 of the SPG refers to yardstick separation distances of 18-21 metres between facing habitable room windows.
- 10.6.23 The layout of the units would in general ensure that the privacy of individual units would be maintained. In terms of privacy between the buildings, a distance of at least 18m would be maintained between the rear walls of properties with habitable room windows. This relationship is within acceptable separation distance to preventing direct overlooking between each of the buildings.
- 10.6.24 On balance, having regard to the somewhat nature of the proposal and taking into account the layout of the buildings, it is considered that the relationships between residential buildings would secure a standard of privacy that would be commensurately high for the vast majority of future occupiers.

Dual Aspect

- 10.6.25 The SPG seeks to avoid single aspect dwellings where: the dwelling is north facing (defined as being within 45 degrees of north); the dwelling would be exposed to harmful levels of external noise; or the dwelling would contain three or more bedrooms. The definition of a dual aspect dwelling is one with openable windows on two external walls, which may be opposite (i.e. front & back) or around a corner (i.e. front and side) and the SPG calls for developments to maximise the provision of dual aspect dwellings.
- 10.6.26 All of the units would be dual aspect units, and therefore each unit would receive adequate levels of natural daylight.

Noise

- 10.6.27 The SPG seeks to limit the transmission of noise between flats, and from lifts/communal spaces to noise sensitive rooms, through careful attention to the layout of dwellings and the location of lifts. Local Plan Policies CP17, DC55 and DC61 include among its privacy and amenity considerations the adequacy of the internal layout in relation to the needs of future occupiers. It is considered that the proposed layout would not have any unreasonable impact in terms of noise on the occupiers of these units.
- 10.6.28 A number of flats would have bedrooms sited adjacent to living/ kitchen areas of adjoining flats. Whilst this is not ideal, in most cases due to site constraints, this is unavoidable. However, having regard to the fact the development would be a new build and therefore would be required to ensure that sufficient noise insulation is

provided to meet Building Regulations. When considered against the requirement for thermal installation also, it is considered that sufficient level of noise mitigation would be achieved to provide a good level of accommodation for future occupiers.

10.6.29 The applicant has submitted a noise assessment report to determine whether any mitigation is necessary to achieve reasonable internal and external noise levels. The acoustic report assesses the acoustic performance of the proposed external building fabric and plant noise limits. The results showed that the noise levels measured were dominated by noise from vehicle movements on neighbouring roads. The survey indicates that in insulation of the adjoining traffic noise, the scheme is relatively quiet.

10.6.30 In conclusion, subject to the imposition of appropriate planning conditions, it is considered that the impact of noise could be mitigated through the design of the buildings.

Daylight and Sunlight

10.6.31 The SPG (2016) states that *“All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen and dining spaces should preferably receive direct sunlight”* (standard 32). Supporting paragraph 1.3.45 outlines that *“An appropriate degree of flexibility needs to be used when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties as well as within new developments themselves. Guidelines should be applied sensitively to higher development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and the scope for the character and form of an area to change over time.”* Local Plan Policy DC61 includes among its amenity considerations the adequacy of light and outlook within buildings (habitable rooms and kitchens).

10.6.32 An assessment of potential impacts on sunlight, daylight and overshadowing has been undertaken and accompanies the application. The daylight and sunlight report is based on the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide'. The assessment considers the impact on the site's residential neighbours, and on the quality of sunlight and daylight to the new residential dwellings and open space. The methodology adopted is considered to be appropriate.

10.6.33 Policy DC61 requires proposals to achieve a high standard of amenity and sets out the considerations for the assessment of amenity, of which light within buildings is one. The weight to be attached to this consideration, within the context of the whole amenity that would be afforded to future occupiers of the development, is ultimately a question of judgement. As mentioned previously, the units are all dual aspects, and as such there will be acceptable level of daylight reaching the units as shown in the submitted Daylight and Sunlight report which stated that all of the units, would have an acceptable degree of natural light. As such, it is considered that they would receive a satisfactory level of daylight and sunlight.

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

Impact of Development on Neighbouring Occupiers

- 10.6.35 London Plan Policy D6 *Housing quality and standards* states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy, overshadowing, wind and microclimate.
- 10.6.36 Core Strategy Policy CP17 requires development to respond positively to the local context in terms of design, siting, density and spacing. Policy DC61 requires all development to achieve a high standard of privacy and amenity, and sets out a number of criteria for the consideration of the same. The Council's Residential Design Guide supplementary planning document is also relevant.
- 10.6.37 The closest existing residential properties to the site are those in Tring Gardens on the south-western side of the road, Priory Road to the north and Tring Close to the south. Though the properties in Tring Gardens will be approximately 16 metres away from the proposed row of three terrace blocks, they will be front to front separated by the main road, which is a common relationship. The closest property in Tring Close will be sited approximately 24.5m from the new two-storey houses while the nearest in Priory Road will be at least 46m away from the closest new two-storey house. Officers consider that the developments proposed would be consistent with the existing character and pattern of development locally and that no material harm to residential amenity will arise from the buildings by way of their proximity or height.
- 10.6.38 In relation to the properties in Tring Walk, the proposed development will be set at least 23m from the boundary of the closest property and would be flank wall to flank wall with no windows proposed in the flank of the new dwelling. Similarly, officers do not consider that any adverse impact upon residential amenity will result from this relationship.
- 10.6.38 In conclusion, the proposed development would not give rise to an unacceptable level of harm to any residential amenities of neighbouring site. It is considered that the proposal would give rise to no conflict with the development plan policies stated above.

10.7 Traffic, Safety and Parking

- 10.7.1 London Plan policy T4 states that 'when required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction

Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance'. Policies T2 and T5 relate to healthy streets, the provision of cycle and pedestrian friendly environments, whilst policy T6 relates to parking standards. Core Strategy policy CP9 seeks to 'secure enhancements to the capacity, accessibility and environmental quality of the transport network', whilst policy CP10 reinforces the aims of London Plan Policy T4, which aims to contribute to modal shift through the application of parking standards and implementation of a Travel Plan. These aims are also reflected in Policies 23 and 24 of the emerging Local Plan.

- 10.7.2 The applicant has provided a transport assessment (TA) in support of their proposal, which concludes that the proposal would give rise to no highway or transportation reasons to object to the proposal. The TA *inter alia* includes an assessment of the existing modes of transportation, the existing and proposed uses and the associated trip generation associated with the use, the impact of construction traffic, servicing, deliveries, pedestrian routes and cycling.
- 10.7.3 The development proposals include closing the existing main access point to the college and adding a new access to the west, with the previous emergency access onto Tring Gardens becoming a secondary access. The proposed site access junction will take the form of a simple priority junction with footways on either side. Appropriate kerb radii and highway width will accommodate the vehicles typically using the access. The application site is located in an area with a PTAL of 1/2 which is considered poor/low and a maximum car parking standard of 2 unit to 1 unit applies. The current application proposes a total of 212 car parking spaces, equating to an average 1.8 space per unit across the site, comprising: 141 spaces for dwelling houses, 42 unallocated parking spaces for apartment residents (1 space per unit), 18 unallocated parking spaces for apartment residents (0.5 spaces per 2-bedroom unit), 8 visitors parking, and additional 3 unallocated parking spaces. There is no information provided about the level of disabled parking spaces nor electric charging points to be installed to meet London Plan requirement. This will however be secured by condition, which is recommended.
- 10.7.4 The applicant has shown the provision of secure cycle storage for the occupiers of the site in line with the requirements set out in the London Plan, achieving at least 1.5 cycle parking spaces per unit. Cycle parking will be provided for each dwelling, with one space to be provided for each proposed apartment; one space for each 1-2 bedroom dwelling house; and 2 spaces for each proposed 3+ bedroom dwelling house. Each house will be provided with storage space for two bicycles within the curtilage of the house. Communal cycle stores will be provided for flats. It is envisaged that this level of provision would encourage residents to use an alternative mode of travel to the private car. Sufficient long and short stay cycle parking for Suttons Building would be provided within its boundary and additional public parking would be provided on the public realm.
- 10.7.5 The Council's Highways Authority (HA) are satisfied with the level of parking being proposed and welcome the level of cycle parking being provided but have expressed concern that given that the current land use of Havering College will change to residential development, there is the need to future proof the impact that this will create immediately on the residents and within the area. HA as recommended Control

Parking Zone / implementation of appropriate parking measures around the development and new zebra crossing is implemented in Whitchurch Road by Tring Gardens in order to mitigate the issues arising in the future. This is to be secured by condition and s106 agreement including Travel Plan, Cycle parking, Servicing, Construction Logistics.

10.8 **Flood Risk and Development**

10.8.1 Local Plan Policy DC48 states that development must be located, designed and laid out to ensure that the risk of death or injury to the public and damage from flooding is minimised, whilst not increasing the risk of flooding elsewhere and ensuring that residual risks are safely managed.

10.8.2 The Council's Strategic Flood Risk Assessment maps show that the site is not located in a higher risk flood zone London Plan policies SI12 and SI13 state that development should utilise sustainable urban drainage systems (SUDS) and should aim to achieve greenfield run-off rates and this objective is reiterated in Policy DC48.

10.8.3 The submitted Flood Risk Assessment (FRA) and Drainage Strategy details the proposed surface water drainage strategy, which seeks to restrict the discharge rates as close to the existing greenfield rate as is practicable using an attenuation tank and hydrobrake system, before being discharged to the Thames Water Surface Water sewer network. The proposed SuDS features will reduce the rate of discharge by providing storage during heavy rainfall events, reducing the risk of flooding. The proposed foul water drainage strategy is to maintain the current arrangement of discharging to the existing foul sewer in Tring Gardens. It concludes that the flood risk assessment is that the proposed SuDS features will ensure flood water will be safely contained within the site boundary up to and including the 1 in 100 year event plus 40% climate change. In this regard, and subject to the imposition of suitable conditions, the proposal would give rise to no conflict with the above stated policies.

10.9 **Accessibility**

10.9.1 Policy DC7 of the Local Plan and Policy D7 of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4(2) – 'accessible and adopted dwellings'. Policy D7 A(1) will require 10% of new housing to meeting building regulations M4 (3) – 'wheelchair user dwellings'. Furthermore, The London Plan requires all future development to meet the highest standards of accessibility and inclusion.

10.9.2 The Design and Access Statement and the submitted plans demonstrate that at a minimum all homes would meet Part M4(2) of the Building Regulations and at least 10% of the homes would be wheelchair adaptable to meet the requirements of Part M4(3). The applicant has stated that the affordable rented wheelchair units would be fully fitted for wheelchair user.

10.9.3 On this basis, the proposed development will give rise to no conflict with the above stated policies.

10.10 **Sustainability**

10.10.1 Paragraphs 151 - 154 of the NPPF relate to decentralised energy, renewable and low carbon energy. Chapter 9 of the London Plan contains a set of policies that require

developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions ,where the residential element of the application achieves at least a 35 per cent reduction in regulated carbon dioxide emissions beyond Part L Building Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. . Specifically, Policy SI2 sets out an energy hierarchy for assessing applications, as set out below:.

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

10.10.2 Core Policy DC48 requires development proposals to incorporate sustainable building design and layout.

10.10.3 The applicant has submitted a Sustainability and Energy Report. The energy report sets out that a 35.42% reductions in regulated CO2 emission is predicted to be achieved onsite.

10.10.4 The Energy Strategy sets out the following approaches to be taken to achieve the London Plan CO2 target reduction:

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

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

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

10.10.5 Whilst a detailed design will be necessary to demonstrate that the proposed development will achieve the overall CO2 reduction, it is anticipated that through the above measures the proposal will achieve an overall CO2 reduction of 35.7%. In terms of carbon offset, it is estimate that 112 tonnes of residential CO2 emissions would need to be offset through of site contributions. This is estimated at £201.609. The final offset contribution would be determined after a completed SAP certificate has been provided. The mechanism to secure this would be through the section 106 agreement.

10.10.6 In conclusion, the development would accord with development plan policies. To ensure compliance with these standards, a condition is attached requiring a post occupation assessment of energy ratings, demonstrating compliance with the submitted energy report.

10.11 **Environmental Impact Assessment (EIA)**

10.11.1 The application has been screened under the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (as amended) and whilst the development would exceed the applicable threshold, it is considered that

the development does not constitute Environmental Impact Assessment (EIA) Development as the development would have relatively low impact on the wider environment.

10.12 Statement of Community Involvement

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

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

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

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

10.13 Archaeology

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

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

10.14 Ecology and Biodiversity

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

the Borough's Biodiversity' SPD (2009). This requires ecological surveys of sites to be carried out prior to development.

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

11 Air Quality

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

- 11.3 However, the Environmental Health Officers has advised that the Air Quality Assessment for the construction phase has shown that the site is Medium to High risk, in relation to dust soiling and Low risk in relation to human health effects. Based on this risk assessment, appropriate mitigation measures need to be set out in a Dust Management Plan, to ensure the air quality impacts of construction and demolition are minimised. This is to be secured by conditions.
- 11.4 The officer went on to note that the Air Quality Note (November 2020) is considered very poor, as the proposed measures to mitigate excess transport emissions would be taken anyway, to satisfy the relevant London Plan policies (e.g. 1 in 5 parking spaces to have EV charging points, spaces for cycling parking etc.). The following mitigation measures should be considered:
- i. An increase in EV charging points (e.g. 20% active, 80% passive, as per the London Plan)
 - ii. Measures to promote sustainable means of transport (e.g. contributions to subsidised or free public bus transport, financial support for cycle purchase or hire, contributions to improved cycle/walk infrastructure etc.). This is to be secured by conditions.
- 11.5 Based on the above and with the suggested mitigation measures in place, it is considered that the proposed development would accord with national, regional and local planning policy in relation to air quality.

12 Financial and Other Mitigation

- 12.1 The heads of terms of the section 106 agreement have been set out above. These are considered necessary to make the application acceptable, in accordance with Policy DC6 of the Havering Local Development Framework Core Strategy and Development Control Policies Development Plan Document (2008) nor meet the objectives of policies H5, H6, and H7 of London Plan.
- 12.2 The proposal would attract the following Community Infrastructure Levy contributions to mitigate the impact of the development:
- The London Borough of Havering's CIL was adopted in September 2019. Therefore financial contributions for the education infrastructure will be secured via this mechanism. Subject to detailed checking and based on the figures provided by the developer in the submitted CIL form in good faith, assuming the application is approved this year, the CIL would be:
 - Havering CIL: 11204-8600@£125/m² (2604m² net)= £328,000*
 - Mayoral CIL: 11204-8600@£25/m² (2604m² net) = £65,100*
- *subject to indexation.

13 Other Planning Issues

- 13.1 Policy CP17 on 'Design' and Policy DC63 on 'Delivering Safer Places' from LBH's 'Development Plan Document' 2008 falls in line with national and regional planning guidance which places design at the centre of the planning process. The above mentioned policy piece together reasoned criteria's for applicants to adopt the

principles and practices of Secure by Design (SBD). More detail on the implementation of the above policy is provided from LBH's SPD on '*Designing Safer Places*' 2010, this document which forms part of Havering's Local Development Framework was produced to ensure the adequate safety of users and occupiers by setting out clear advice and guidance on how these objectives may be achieved and is therefore material to decisions on planning applications.

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

14 **Conclusions**

- 14.1 The proposed redevelopment of the site would provide a high quality residential development which would be a positive contribution to this area of Harold Wood. The site is currently occupied by buildings of a former adult education facility which is characterised by a varied configuration of built forms. The development will result in investment in education services elsewhere in the Borough and allow for existing courses to be run out of modern facilities. The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, and good routes, access and makes a positive contribution to the local area, in terms of quality and character and would not have a undue impact on the openness of the Green Belt and the purpose of including land within it than the existing development.
- 14.2 The proposed would secure the provision of onsite affordable housing at a level that meets the minimum affordable housing target set out in the development plan, including 37% affordable housing on a habitable room basis and 39.2% by unit; provision of 46% family units to meet the needs of the surrounding area. Overall, the number of units proposed would positively add to the Council's housing delivery targets. The proposal would also see the provision of a financial contributions for enhancements to existing sports facilities that are for use by the public.
- 14.3 The proposed redevelopment of the site would result in a modern, contemporary design that responds positively to the local context, and would provide appropriate living conditions which would be accessible for all future occupiers of the development.
- 14.4 The layout and orientation of the buildings and separation distance to neighbouring properties is considered to be satisfactory to protect the amenities of the neighbouring occupiers and the development would contribute towards the strategic objectives of reducing the carbon emissions of the borough.
- 14.5 The proposal is considered to be acceptable in respect of all other material issues, including parking and highway issues, impact on amenity and environmental effects.

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