



Havering
LONDON BOROUGH

**Strategic Planning
Committee
24 March 2022**

Application Reference:	P1789.21
Location:	23-25 Victoria Road
Ward:	Romford Town
Description:	Erection of a part five storey and part six-storey mixed-use development to include 8 x 1-bed, 22 x 2-bed, 7 x 3-bed self-contained residential units, ground floor commercial units, associated car parking, cycle stores, landscaping and refuse facilities and to involve the demolition of existing buildings on site.
Case Officer:	Victoria Collins
Reason for Report to Committee:	A Councillor call-in has been received which accords with the Committee consideration criteria.

1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 1.1 There are no in principle objections to the proposals and through the application of conditions and a legal agreement officers are able to secure a development that would make an important contribution to housing delivery within the Borough as well as securing 10% affordable housing (4 units).
- 1.2 The approach to site layout, height and massing represents an acceptable approach given the location of the site. The initial scale and design was also reviewed by the Council's Quality Review Panel.

- 1.3 The application seeks planning permission for the redevelopment to provide for 37 residential units (minimum 10% affordable within block B) comprising of part 5 and part 6 storeys.
- 1.4 The proposals would have public benefits in making a contribution towards meeting the above targets for net additional housing provision, including shared ownership housing tenure. As such, the principle of a residential-led scheme on the site is considered appropriate subject to compliance with all relevant policies of the development plan.
- 1.5 Other benefits include the provision of modern residential/commercial accommodation with high quality landscaped private amenity spaces and an improved design quality of the street with tree planting on Victoria Road.
- 1.6 The recommended conditions and Heads of Terms would secure future policy compliance by the applicant on the site and ensure any unacceptable development impacts are mitigated. Therefore officers consider that all matters have now been sufficiently addressed and the application is recommended for approval.

2 RECOMMENDATION

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

The prior completion of a Legal Agreement pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended) and all other enabling powers to secure the following planning obligations:

- Early Review Mechanism if the development is not implemented within 2 years.
- Late Stage Viability Review Mechanisms to capture any uplift in profit, threshold of which to be negotiated.
- Shared Ownership (4 units)/10% by habitable room – 1 x 1b2p; 1 x 2b3p; 2 x 2b4p (11 habitable rooms).
- Affordable housing breakdown and unit location.
- Carbon offset fund contribution in respect of shortfall to achieve a 100% reduction in carbon dioxide emissions compared to Part L of the Building Regulations 2013, such contribution sum calculated at forty nine thousand, seven hundred and eighty seven pounds (£49,787.00) per tonne that falls below the 100% threshold, for a period of 30 years, duly Indexed.
- S278 for the new access and Road Safety audit.
- Contribution towards Cycle route (£20,000.00).
- Review of existing parking in the adjoining roads; including consultation and implementation of CPZ (Amount TBC at the committee meeting).

- Car free restriction on obtaining parking permits in existing and future Controlled Parking Zones/s to be secured by agreement pursuant to Section 16 of the Greater London Council (General Powers) Act 1974.
- Employment and Training.
- Reasonable legal fees for the drafting and negotiation of the deed whether or not it goes to completion
- S106 monitoring fee towards the Council costs of monitoring compliance with the deed.
- All contribution sums to be indexed.

2.2 That the Assistant Director of Planning is delegated authority to negotiate the legal agreement indicated above.

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

Conditions

1. Time Limit of Implementation
2. Compliance with approved Plans
3. Approval of Materials
4. Accessibility and Management Plan - Residential
5. Cycle park management plan
6. Occupier Cycle Parking
7. Visitor Cycle Parking
8. Travel Plan
9. Site Levels
10. Secure by Design
11. Accessibility and Adaptability
12. Provision of Amenity Space
13. Refuse Storage and Segregation for Recycling
14. Carbon Reduction- Residential
15. Energy compliance
16. Photovoltaic panels – Energy hierarchy
17. Energy Efficiency
18. Overheating
19. Ecology and Landscape Management Plan
20. Landscaping, play space and boundary treatments
21. Living Roofs
22. Birds and Bat boxes
23. Demolition and works to vegetation
24. Air Quality Assessment
25. Combined Heat Power
26. Noise Assessment
27. Lighting Strategy
28. Sustainable Urban Drainage

29. Drainage Strategy
30. Drainage Maintenance
31. Piling Method Statement
32. Non-Road Mobile Plant and Machinery ("NRMM")
33. Contamination Remediation Scheme (enabling works)
34. Remediation Scheme (enabling)
35. Unexpected Contamination
36. Construction Environmental Management Plan
37. Demolition and 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).
38. Piling Vibration
39. Written Scheme of Investigation
40. Foundation Design
41. Satellite Dishes
42. Fire Safety
43. Bird Hazard Management Plan
44. Outline Delivery and servicing plan for residential uses
45. Forecourt parking layout and Landscape plan
46. Urban Greening Factor
47. Privacy screens
48. Restriction on commercial uses
49. Hours of deliveries to commercial uses
50. Hours of operation of commercial uses

Informatives

1. Planning obligations
2. Street naming and numbering
3. Thames Water
4. Lighting
5. Environmental Health – Gas
6. Written scheme of investigation
7. London Fire Brigade
8. Network Rail
9. Contaminated land
10. Refuse
11. Deemed discharge
12. Pre-commencement conditions
13. Highway legislation
14. Temporary use of the public highway
15. Surface water management
16. Highway approval required
17. Secure by design
18. Community Infrastructure Levy (CIL)
19. NPPF positive and proactive

- 2.4 That, if by 1 August 2022 the legal agreement has not been completed, the Assistant Director Planning in consultation with the Director of Legal Services is delegated authority to refuse planning permission.

3. PROPOSAL AND LOCATION DETAILS

Site and Surroundings

- 3.1 The site comprises 0.177 hectares (1770sq.m) of a rectangular plot of approximately 29m wide and 61m deep, bounded to the south by Victoria Road and to the north by the railway line. The site is currently occupied by a 2-storey bay-fronted Victorian residential-scale building providing a street frontage to the south-west corner of the site with single storey rear extensions. A large warehouse structure occupies the rear of the site, taking up almost its full width. The forecourt comprises an open storage and lorry/van parking area, forming the remaining street frontage to Victoria Road with a gated fence that projects to the front of the site ownership. The rear boundary of the site comprises a brick wall to the elevated railway line. Vehicular access to the site is from Victoria Road.
- 3.2 Victoria Road is a two-way street running parallel to the railway line and is fronted predominantly by retail and commercial uses at ground and sometimes first floors, with residential flats on upper floors.
- 3.3 The buildings along the northern side of Victoria Road range from 2 to 5 storeys, including Mercury Court to the east of the site. There is a proposal for a 5 and 6-storey buildings on the immediately adjacent site to the east which was allowed on appeal in 2019 (development commenced). On the southern side of Victoria Road, heights range from 2 to 4 storeys, although there is a consent to add an additional set-back 5th storey to the Portman House building to the south-west of the site (Application Ref. P1366.15) which was allowed on appeal but yet to be implemented. The buildings to the north of the site beyond the railway line range from 5 to 7 storeys, including the recently extended 7-storey Morland House directly opposite the site.
- 3.4 The site is currently served only by buses on Victoria Road and has a PTAL of 6a/6b, indicating an excellent level of public transport accessibility. The site is located within the Romford Strategic Development Area and Metropolitan Town Centre and the surrounding area is characterised predominantly by a mixture of commercial uses with residential accommodation at upper floor levels.
- 3.5 The site is allocated within the Romford Area Action Plan (ROM14) which identifies the site as a housing 'Higher Density Redevelopment Area' where redevelopment of sites to deliver housing is supported in principle.

3.5 The site is not in a Conservation Area, no buildings within the curtilage of the site are statutorily or locally listed and there are no Tree Preservation Orders (TPOs) on site or directly adjoining the site.

4 Proposal

4.1 Comprehensive redevelopment of the site to deliver 164.3 sq.m of commercial space, 37 residential units together with associated access, landscaping and car parking, including cycle parking. These residential units are broken down as follows:

- Block A (front block) at five storey comprising of 10 x 2b4p; 4 x 3b6p and 1 x 3b5p units.
- Block B (rear block) at six storey comprising of 8 x 1b2p; 1 x 2b3p; 11 x 2b4p and 2 x 3b5p units.
- Access to the rearmost block would be via an access road through the easternmost part of the ground floor of the five-storey building.
- The area between the two buildings would provide a communal amenity area and child-play space.
- Would provide 10% Affordable housing (shared ownership).
- At pre-application stage the proposal was significantly revised. The amendments resulted in a reduction in the height of the proposed blocks (A & B) by 1 storey; reducing depth of proposed blocks and, increasing set back from railway. These helps to address scale, massing and noise issues for residents and an improvements to sunlight into the courtyard area and internal spaces, including reductions in impact on the daylighting and sunlighting to neighbouring occupiers and a consequential reduction to the unit numbers of the scheme by 19 units.

5 PLANNING HISTORY

5.1 The following planning applications are relevant to the site:

- P0480.96: Change of use – tool and equipment hire and sales – Approved 4th June 1996 (and development implemented).
- P1890.08: Change of use from retail (A1) to offices (B1) – Approved 19th December 2008 (and development implemented).

- P0323.20: Change of use from A2 (Financial and Professional Services) to eye care provision within class D1 (Non-residential Institutions) of the Order. Approved 15th June 2020.
- P1890.08: Change of use from retail (A1) to offices (B1) – Approved 19th December 2008.

6 CONSULTATION RESPONSE

6.1 A summary of statutory Consultee consultation responses are detailed below:

- **Network Rail:** No objection subject compliance with following requirements:
 - Developer's agreement with National Rail Asset Protection Team prior to any works commencing on site.
- **Transport for London:** No objection subject to power-assisted door openings leading to the rear cycle storage area and the retention of the blue badge parking on-site conditions.
- **Thames Water:** No objection subject to Piling Method Statement and Groundwater discharge informative.
- **London Fire Brigade:** No objection. No further fire hydrants required.
- **London Fire and Emergency Planning Authority:** No objection subject to compliance with following requirements:-
 - Sprinkler system to be installed in accordance with BS9251:2005.
- **Metropolitan Police Secure by Design Officer:** No objection subject to the attachment of secured by design conditions and informative.
- **LBH Environmental Health (Land Contamination, noise, air quality):** No objection subject to conditions governing contaminated land, air quality neutral, residential boilers, noise and sound insulation.
- **LBH Highways:** No objection subject to conditions, legal obligations and informatives being applied: restrict parking permits; S278; cycle route improvement.
- **LBH Refuse Officer:** No objection, the Council's standard guidance to be adhered.

- **LBH Education:** No objection subject to legal obligation (S106) to fund creating additional school places.
- **LBH Street Name and Numbering:** No objection.

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 and this has been detailed in the submitted Statement of Community Involvement (SCI).

7.2 The applicant states that a wide consultation exercise has been carried out by engaging the with ward councillors; creation of a dedicated project email address – victoriaroad@communicationspotential.co.uk; leaflet mail out to local residents (483 properties), informing them about the proposals and inviting them to register for a virtual public drop-in session, and to complete a questionnaire providing feedback (with a Freepost return envelope enclosed); one virtual public drop-in session (held via Zoom) to inform residents about the proposals, answer questions and hear feedback and actively engaging via telephone and email with residents, answering queries, acknowledging comments and processing requests. 12 residents participated in the consultation exercise with feedback.

7.3 The main issues raised and the developer's responses are set out below.

1. Car-free development, the impact on local infrastructure, the lack of need for new homes, proximity to the railway, and the proposed removal of existing building on site.

Developer's Response: The site is located within a controlled parking zone (CPZ), which restricts parking to permit holders only between 8.30am–18.30pm, Monday to Saturday. The proposals would provide four wheelchair accessible parking spaces within the forecourt. Should planning permission be granted, residents of the proposed development at 23-25 Victoria Road will not be eligible to obtain a permit for parking in this zone. This permit-free approach is a well-established method of delivering car-free residential developments in sustainable locations. The need for new homes is identified as a core objective in both national, regional and local planning policy.

2. The potential use of the commercial units as fast-food outlets.

Developer's Response: The proposed commercial units would be Class E and not sui-Generis.

3. The provision of new homes and commercial space would place strain on local infrastructure and services, including emergency services, schools, highways, trains and parking.

Developer's Response: The proposals is CIL liable – with financial contributions to mitigate the impact of new development on existing communities and appropriate S106 to secure all other obligations.

8 PRE-APPLICATION DISCUSSIONS

Quality Review Panel (QRP) Comments

- 8.1 The application was presented to the QRP for comments on the 16th February 2021. Final comments received from the panel were as follows:
 1. Panel unconvinced by the decision to use the new eastern neighbour as a guide to the scheme's massing and height, rather than looking to the needs and capacity of the wider context.
 2. While neglected and fragmented, the historic character and evolution of Victoria Road still offers an interesting starting point for the design thinking underpinning the scheme and the panel therefore feels that looking for a precedent in the neighbouring scheme to the east, rather than in existing built assets, is a missed opportunity. Therefore drawing on this precedent might produce a more successful layout of the scheme.
 3. The loss of the existing Victorian building is regrettable.
 4. Questions the adoption of a framed approach to the elevations, which brings another new architectural language into the street.
 5. Design team to rebalance the fenestration, so more of the street-fronting façade is solid.
 6. Questions the extent to which a neighbourhood of this density is truly family-friendly, with the need to relax the layout with reduction in units from each floor. A shallower plan, with fewer units would also allow for greater daylighting with less heavily-glazed elevations.
 7. A shallower plan alongside consideration of higher massing to the north and lower to the south may improve residential quality overall, as well as responding better to the street scale and higher buildings beyond the railway.

8. Further internal layout amendment required for the 3 bed 5 person units which may feel excessively cramped at full occupancy as currently proposed.
9. Unconvinced by the proposed location of the bike store for all residents within Block B, as this creates awkward and convoluted route from units to this facility. The absence of an internal entrance to the bike store in Block B is another missed opportunity.
10. Concerned about the risk of overshadowing of the courtyard, particularly in the darker months. The viability of the planting proposed here will need to be tested against the amount of sunlight that will be available to the space.
11. Concerned about the robustness of grass in the courtyard, which it feels needs to be tested.
12. Boundary treatments to the courtyard are unresolved, further work on solutions appropriate to both the current and future neighbours of the scheme is required.
13. Number and arrangement of car parking spaces in front of the building obstructs the direct route to the entrance to Block A. An alternative arrangement or, better, a reduction in the number of spaces would make for a more pleasant arrival. This could be achieved by reducing the total number of units within the scheme.

8.2 The proposals have evolved considerably since being presented to the QRP on the 16th February 2021. A significant number of positive changes have been incorporated into the final scheme, relating to reductions in unit number, massing and height, public realm improvements, quality of the residential units and meeting the objectives for family housing. Of the above concerns all have now been addressed by the changes made to the scheme over the last year.

This includes the following:

- Reduced height to Blocks through the removal of a floor level with topmost floor set back.
- Reduction in unit numbers from the original 56 down to the current 37 through various reductions in massing and bulk of each block, both blocks now have 4 units around a core on each typical floor.
- Reconfiguration of the ground floor layout of Block A and B to provide the most efficient layout, prioritising pedestrian routes through redistributing ancillary space and consolidating plant space.

- Developed the architectural language of the façades to reflect the local character. Expressing the vertical elements as the primary supports, introducing arches, in reference to historic context and adding glazed brickwork details.
- Removal of winter gardens in response to the continuing daylight and sunlight studies, air quality and noise pollution assessments. As well as alterations to the proportions and positioning of openings to balance the solid/void ratio.
- Archway removed from the West side of Block A and the central entrance to Block A, removing the symmetry and giving extra emphasis back to the archway over the Mews Passageway that leads to the courtyard and Block B.
- Reduction in the number of materials in the palette, altered glazed brick colour, lighter top floors, and lighter window colour.
- The internal planning of the dwellings in both blocks has been amended to improve efficiency, access to daylight and better proportioned spaces with wider and shallower or dual aspect living spaces.
- Reconfigure the forecourt to the front building to remove parking spaces and relocate routes to better suit the residential and commercial unit entrances.

9 LOCAL REPRESENTATION

- 9.1 A total of 94 neighbouring properties were notified about the application and invited to comment. The application has been publicised by way of site notice displayed in the vicinity of the application site. The application has also been publicised in the local press.
- 9.2 The number of representations received from neighbours in response to notification and publicity of the application were as follows:
- No of individual responses: [3] of which, [2] objected and [1] supported.
 - Petitions received: None
- 9.3 The following local groups/societies made representations:
- Romford Civic Society: No objections; concerns about precedent and equality implications of access to the units.

9.4 The following Councillor made representations:

- Councillor Judith Holt [objecting] and call in for the following reasons: Land use, Infrastructure/Parking; Access and egress; Congestion at the junction; Amenity space; Bin stores and Heritage.

Representations

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

Land use – change of use with overdevelopment of site; out of character.

Infrastructure – inadequate car parking.

Loss of light and privacy.

Driveway access and unclear distance between no.21 and 23.

Height – higher than other buildings on Victoria Road.

Access and egress – congestion near the ring road; exacerbate the existing parking issues.

Waste collection – lack of access.

Noise – the survey was conducted during lockdown.

Lack of amenity space – small garden space.

Heritage – demolishing existing Victoria Villa.

Equality - Access to those with limited mobility

Supporting comments

Provides high quality design contemporary building with better appearance in the street.

More opportunities for local business.

Non-material representations

Boundary issue – this is a civil matter and not a material planning consideration.

The scheme and the adjoining development which was allowed on appeal might become precedent – Applications are determined based on planning merits.

10 MATERIAL PLANNING CONSIDERATIONS

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

- Principle of Development
- Design and Tall Buildings Considerations
- Heritage Consideration
- Quality of residential accommodation
- Inclusive Design
- Secured by Design
- Density
- Housing Mix
- Affordable Housing and Viability
- Communal Amenity Space and Children’s Play Space
- Impact on Neighbouring Amenity
- Environmental and Climate Change Implications
- Transport and Highways
- Energy and Sustainability
- Flooding, Drainage and Urban Greening Factor
- Community Infrastructure Levy

Principle of Development

10.2 On 14 January 2022 the Government published the 2020 Housing Delivery Test (HDT) results. The results show that within Havering 46% of the number of homes required were delivered over the three year period of 2018-19 to 2020-21. The NPPF (paragraph 11d) states that where the delivery of housing was substantially below (less than 75%) the housing requirement over the previous three years, the policies which are most important for determining the application are considered out of date. This means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. This is commonly referred to as the “tilted balance” in favour of sustainable development and is a significant relevant material consideration in the determination of the planning application.

10.3 Policy H1 of the London Plan seeks to optimise potential housing delivery across London, particularly through higher density residential development on

brownfield sites with good existing or planned access to public transport and within walking distances of stations and town centres. The London Plan has set a 10-year housing target of 12,850 homes a year for the period between 2019/20 to 2028/29.

- 10.4 The site lies within an area defined for Housing Supply, higher density on the Proposals Map. Policy 3 of the Havering Local Plan aims to meet a minimum housing supply of 5,000 homes within Havering by prioritising the development of homes on major sites in the Romford Strategic Development Area. The proposals would provide 37 residential units and 164m² of flexible commercial floor space.
- 10.5 The site lies adjacent to an area defined as Retail Fringe on the Proposals Map. The proposed retention of the commercial use at ground floor level and introducing residential use at the first floor level would therefore be compatible with surrounding uses and would comply with the Local Plan Policy 1 and Policy 3, the London Plan Policy SD7 and the NPPF paragraph 92. The ground floor commercial use is proposed to be flexible E Class use, this would be consistent with development in this part of Victoria Road, where the ground floor areas are generally commercial, in line with the aim of the emerging Romford Masterplan.
- 10.6 The provision of additional housing is consistent with the NPPF, London Plan Policy H1 and the Council's policy 3, therefore the proposal is acceptable in principle - in land use terms. Notwithstanding, the acceptability of the proposal is subject to consideration of the detailed impacts of the development and these are discussed in turn below.

Design and Tall Buildings Assessment

- 10.7 NPPF Chapter 12 'Achieving well-designed places' reinforces that this is a key aspect of sustainable development and indivisible from good planning and should contribute positively to making places better for people. It also confirms that high quality design includes consideration of individual buildings, public and private spaces that will function over the lifetime of the development. The NPPF attaches great importance to the design of the built environment, stating that policies and decisions should ensure that development amongst other things, responds to local character and history and reflects the identity of local surroundings and materials, whilst not preventing or discouraging appropriate innovation. Also, that they are visually attractive as a result of good architecture and appropriate landscaping.
- 10.8 The London Plan Policy D1 as well as the Council's policy 26 set out broad design requirements for new development to ensure that buildings, spaces and places are high-quality, sustainable, accessible, attractive, durable and well integrated with their surrounds. And in addition to deliver high-quality public

realm consisting of streets and spaces that are safe, attractive and integrated with buildings that respond to and overlook public spaces.

- 10.9 The building heights strategy was based upon locating the taller block B (6 storey), similar to the height on the neighbouring site to the east to the rear and the mixed use block A (5 storey) facing onto Victoria Road. Given this and the wider surrounding context, reflecting the established building line to Victoria Road the proposed height would be considered acceptable.
- 10.10 The proposal is to provide 37 residential units in two blocks one part 5 and the other part 6 storey buildings with the top storey set back. The building footprint would be broadly rectangular shaped.
- 10.11 The proposed layout would ensure provision of amenity space, adequate separation between both blocks, and allow for a high proportion of dual aspect units, good daylight and sunlight penetration and a courtyard which will receive excellent levels of sunlight. The coherent building line and generous pavement space will enable the creation of a high quality public realm provided to the front of the site.
- 10.12 Activity and surveillance is provided by the proposed commercial unit, which is welcomed, although details of use will need to be achieved via condition.
- 10.13 The massing of the buildings have been designed in a way to respond to the site context and establishing a family of buildings with a common architectural language with the adjoining development to the east. Block A with the proposed improved public realm would contribute to the hierarchy of streets and experience of the public realm and with high quality palette of materials to reinforce the sense of place.
- 10.14 The buildings would be clad in brick, with three different brick tones used to provide visual interest with recessed balconies to provide identity and emphasis. Deep window recesses would be used. The single storey set-back elements at the top floor would be clad in white glazed bricks to provide a lighter and brighter appearance. This would help to reduce the perceived height of the scheme and to further add to the visual interest.
- 10.15 It is considered that the proposed layout, design and masterplan principles would accord with both the strategic and local urban design policies set out above.
- 10.16 Subject to conditions requiring details and samples of all of the proposed materials, they are considered to suitably reference and complement the palette of materials in the surrounding area and are acceptable. Additionally, these conditions should ensure that lower quality materials are not used in order not to undermine the quality attributed to the design. Consequently, a full size sample panel will be conditioned.

- 10.17 Overall, in terms of detailed architectural design, the proposals have been carefully considered and subject to the conditions outlined above, the proposal will achieve a high quality and appropriate design response which would enhance the character of the site and surrounding area.

Heritage Assessment

- 10.18 The application site comprises amongst other things a mid-nineteenth century two-storey building which features typical Victorian form and some architectural details. The site on its own is not relevant to any designated or non-designated heritage asset. Victoria Road was originally laid out in the mid-nineteenth century and that the local built environment had an inherently Victorian character, although whilst the existing building on site makes some contribution, the site as a whole has very limited local heritage value.
- 10.19 The Victorian building has already lost its chimney stack and has undergone significant internal alterations to accommodate the existing commercial use on site which detract from its architectural character. In addition, the immediate surroundings having significantly evolved over time have made its inherent context almost illegible. It can therefore be concluded that the overall significance of the building to portray the local historic character is minor, especially when there are many other Victorian houses and the Victoria Public House (a locally listed building) further east on Victoria Road that mark the mid-nineteenth century development of Romford. The Council's Heritage consultants advised that given the above the demolition of the building would not have a significant heritage impact on site and on the local character and distinctiveness of the area.
- 10.20 Given that the predominant built environment on Victoria Road consist of buildings of variable design, scale, height and a few larger buildings, the proposed development to have two 5-6 storey blocks of mixed residential and commercial buildings with significant setback at the top floor levels would not have a significant heritage impact on the site and wider surrounding area.
- 10.21 The proposals maintain improvements to pedestrian permeability through the site and active frontages are proposed at ground level. The proposed buildings would provide a positive impact on longer distance views. The proposed new buildings would result in an addition to an already varied townscape and will deliver an improvement to the skyline through its aspirational high quality design and appearance.
- 10.22 In light of the above, officers would conclude that the loss of an existing non-designated heritage asset is regrettable, however when balanced against the provision of additional housing for the Borough and the re-development of the site to provide a scheme of relatively high design quality and appearance in relation to much of the recent development in the area, it would therefore be

considered acceptable with no significant harm on the local character and distinctiveness and would comply with Paragraph 197 (C) of the NPPF 2021.

Quality of residential accommodation

- 10.23 Policy D6 of the London Plan provides the minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights for all tenures of residential housing. Single aspect units should normally be avoided and only provided where these units would constitute a more appropriate design solution in terms of optimising the capacity of a particular site whilst ensuring good design. Potential issues associated with single aspect units in terms of passive ventilation, privacy, daylight, overheating and noise should also be adequately addressed and single aspect units that are north facing contain three or more bedrooms, or are exposed to significant adverse impacts should normally be avoided.
- 10.24 These requirements are also further elaborated within the Mayor's London Housing SPG. These set out a benchmark unit per core per floor ratios. Together these form the pivotal backbone for the quality of any future residential accommodation.
- 10.25 Provision of dual aspect units has generally been maximised as far as the courtyard layout allows and there would be no single aspect north facing units due to the design of the units. The proposed flats would benefit from adequate privacy, outlook and private external amenity space in excess of the minimum standards. All flats meet the minimum standard for internal floorspace and some exceed this as well as floor to ceiling heights. A condition has been included to require appropriate accessibility standards including 10% of units to be delivered as either Wheelchair Adaptable or Accessible.
- 10.26 The Average Daylight Factor (ADF) calculations have been submitted to demonstrate the quality of daylighting to the proposed units, which has been reviewed by officers. Out of 78 rooms analysed, 97.5% will achieve or exceed the recommended ADF. The two rooms that do not achieve this are a second bedroom at first and second floor levels. The submitted report highlights how all Living/Kitchen/Dining (LKDs) and Living/Dining (LDs) in both buildings at all floor levels achieve the recommended ADF of 1.5% or more and all except two secondary bedrooms achieve 1% or more. The proposals will provide accommodation with good access to daylight overall.
- 10.27 Additionally, appropriate sunlighting would be achieved both to the proposed residential units and to the external amenity areas. The proposed courtyard's access to direct sunlight has also been assessed and 64% of this area achieves at least 2 hours of direct sunlight on the 21st March. This is greater than the recommended 50% and therefore the guidelines are achieved. From the analysis undertaken for the 21st June, this demonstrates it will have access to

direct sunlight from 7am to 6pm, with more than 90% of the area enjoying 2 hours of direct sunlight.

- 10.28 The proposed planting of the courtyard space has been designed in conjunction with the daylight and sunlight study of the courtyard, to ensure planting and lawn areas will receive the necessary sunlight. Appropriate condition would be imposed to ensure compliance with the policy requirements.
- 10.29 Overall, the proposal would provide a high quality of living accommodation and amenity to the future occupiers of the development, in accordance with the aforementioned policies.

Inclusive Design and Fire Safety

- 10.30 Policy D5 of the London Plan requires that all new development achieves the highest standards of accessibility and inclusive design, ensuring they can be entered and used safely, easily and with dignity by all; are convenient and welcoming (with no disabling barriers); and, provide independent access without additional undue effort, separation or special treatment, whilst Policy 7 of the Havering Local Plan seeks 10% of all new homes to be wheelchair accessible and 90% to meet the Building Regulation requirement M4(2) 'Accessible and Adaptable Dwellings in line with Policy D6 of the London Plan.
- 10.31 Details submitted with the application demonstrate that the development could meet the above requirements. These details are to be secured by condition to ensure that the development would be in full compliance with the provision of M4 (2). As such, the relevant condition will be applied.
- 10.32 The development would provide 10% wheelchair user units. Therefore the development would also comply with the provision of M4 (3) and these details are also to be secured via the imposition of a condition.
- 10.33 In accordance with the London Plan Policy D12 on fire safety, the applicant submitted a fire statement, produced by a third party suitable qualified assessor. Policy D5 (B5) of the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In developments with lifts, as a minimum, at least one lift per core (or more subject to capacity assessments) should be suitably sized fire evacuation lifts capable of evacuating people who require level access from the buildings. It is noted that evacuation lifts should be provided in addition to Building Regulations requirements for firefighting shafts/lifts to ensure they can be used for evacuation purposes when the firefighting lift is in use by the fire and rescue service.

10.34 The applicant has provided a statement containing a declaration of compliance that the fire safety of the proposed development and the fire safety information satisfy the requirements of Policies D12 (A) and D5 (B5).

Secured by Design

10.35 In terms of safety and security, the Police find the scheme acceptable subject to Secured By Design standards and details of lighting and security measures to be achieved by condition. All of the proposed public realm and the communal courtyard would be well overlooked with passive surveillance provided by the residential accommodation.

Housing Mix

10.36 Policy 5 of Havering's Local Plan Policies seeks to support development proposals that provide a mix of dwelling types, sizes and tenures and sets out an indicative mix for market and affordable housing as below:

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

Table 1: Housing mix policy requirements

10.37 The borough's housing needs indicate a greater emphasis on family sized accommodation and the priority being 2 and 3 bed properties with 1 bed properties less of a priority. The policy equally states that it would have regards to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities.

10.38 Policy H10 of the London Plan states that new development should generally consist of a range of unit sizes and sets out a number of factors that should be considered when determining the appropriate housing mix on a particular scheme. This includes housing need, the requirement to deliver mixed and inclusive neighbourhoods, the nature and location of a site in relation to town centres and public transport access, the requirement to optimise housing potential, and the relationship between new build housing supply and demand within the existing stock.

10.39 The proposed housing mix as below:

	1 bed	2b3p	2b4	3 bed
Market Housing	21%	3%	55%	21%
Affordable Housing	25%	0%	75%	0%
Total %	22%	3%	57%	19%

Table 2: Housing mix proposed

10.40 Of the 37 total residential units proposed, 33 units would be private housing with a mix as 1, 2 and 3 bedrooms stated above. And the proposed 4 affordable (shared ownership) units would have a mix of 1 and 2 bedroom units. Overall, the housing mix would consist of 21% 1-bedrooms, 60% 2-bedrooms and 19% 3-bedrooms.

10.41 Whilst the percentage of one beds does not comply with Policy 5, it is recognised that this is a constrained town centre site, where there is less scope to provide a greater number of larger units with the provision of appropriate levels of amenity space, and with the need for the scheme to be economically viable, thus on balance the proposed mix of housing for this development is considered to be acceptable.

Affordable Housing and Viability

10.42 In line with Chapter 5 of the National Planning Policy Framework, the London Plan policies guide the provision of affordable housing. London Plan Policy H4 and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing in all new developments. Policy 4 of the Havering Local Plan seeks to ensure that in total, borough-wide minimum of 35% of all homes from new residential planning permissions are affordable; of which 70% of affordable housing to be delivered as social/affordable rent and 30% as intermediate, to include London Living Rent and Shared Ownership.

10.43 The proposal would provide 4 out of 37 units as affordable units (10.8%) and 10% by habitable rooms at 100% intermediate. The shortfall in the 35% policy requirement of affordable housing necessitates the need for a Viability Assessment in accordance with the policy.

10.44 A viability appraisal has been submitted with the application and was independently reviewed by the financial viability consultants appointed by the Council. The review states that the scheme is in deficit and cannot support any affordable housing which is accepted by the Council's viability consultants. Given the scale of the development, the limited number of affordable units and

there being only a single core in the blocks means that an affordable housing providers would not be interested in such a development and thus it has not been possible to secure any social rented housing. However, the applicants have proposed to make a commercial decision to offer 10% affordable housing (by habitable rooms) which complies with the NPPF which states that at least 10% of the total number of homes to be available for affordable home ownership. As part of the s106 a clause will be added to require an early and late stage review of viability. On balance whilst not providing the form of affordable housing most beneficial to the Council, given the schemes viability the proposals are considered to be acceptable.

Open Space and Children's Play Space

- 10.45 Policy 18 of the Havering Local Plan Policies states that it will require major new residential developments to include provision for adequate open space, recreation and leisure facilities.
- 10.46 Policy S4 of the London Plan states that residential developments should incorporate high quality, accessible play provision for all ages, at least 10 square metres per child. Play space should be available to all housing tenures within immediately adjacent blocks and courtyards to promote social inclusion.
- 10.47 Policy 18 advises that useable child play space is provided in accordance with the GLA child yield calculations. The development is anticipated to yield 8.1 children, accordingly, 81sqm of play space is required.
- 10.48 The application proposes creation of a secure courtyard measuring 454sqm in total to serve as child play space and communal amenity space. Some of these areas would form a dual purpose and when these are excluded such as defensible space and pathways, the central landscaped communal amenity space would be 315sqm, which given the provision of private amenity space for each flat in the form of balconies is acceptable.
- 10.49 The design and landscaping of the amenity area is located at the heart of the development, stitching the two blocks together. The proposed development given the proximity of other open parks surrounding the application site, the proposals would be considered acceptable to comply with policy.
- 10.50 Overall, the proposed communal amenity and play space areas would be acceptable, in accordance with the aforementioned policies. A condition has been included to secure the details of landscaping and play facilities.

Impact on Neighbouring Amenity

- 10.51 Residential amenity comprises a range of issues which include daylight, sunlight, privacy, overlooking, overshadowing impacts, as well as sense of enclosure and a loss of outlook. These issues are addressed in detail below.
- 10.52 The Development Plan contains policies including Policy 7 which seek to appropriately safeguard the amenities of residential occupiers when considering new development.
- 10.53 The application was accompanied by a sunlight and daylight report which provided an assessment of the new development and its relationship with existing neighbouring buildings. In terms of neighbouring properties, the properties considered are as follows:
- 10.54 With regard to the proposed development at 29-33 Victoria Road, the adjacent site to the east, the impacts on the occupiers light would be generally minor. While 5 (10%) out of 49 windows analysed will experience daylighting reductions, this is because these 5 windows are located beneath balconies, and would still comply with the guidance. The daylight distribution analysis undertaken with 47 rooms, 40(85%) would be within the BRE guidelines and the remaining 7 are either under balconies or serving bedrooms, with marginal loss which would be marginal and acceptable within the BRE guidelines to retain good access to daylight.
- 10.55 The Centre View property is located on the opposite side of Victoria Road and provides residential accommodation at first, second and third floor levels. Out of 9 windows analysed, 7 (78%) would meet the BRE guidelines, and the 2 windows which do not meet the set numerical values in the BRE guidelines are located at the rear of recessed balconies, this is similar for daylight distribution, however the BRE guidelines are achieved, and this property will retain good access to daylight.
- 10.56 The Metro is a property located to the east of the site, on the opposite side of Victoria Road and provides residential accommodation at first, second and third floor levels. The VSC analysis demonstrate that all windows assessed will achieve 100% of numerical values set out in the BRE guidelines. And the daylight distribution analysis demonstrate that 12 of the 18 rooms assessed (67%) will achieve the numerical values set out in the BRE guidelines. Of the remaining six, five serve bedrooms and only one of the rooms would be outside the BRE guidelines for daylight distribution but this would be only be marginal (0.73). The property will retain good access to daylight, given its urban location of the site.

- 10.57 44 Victoria Road is located to the east of the site and has planning consent to provide residential accommodation at first and second floors. Out of 11 windows analysed, 10 windows (91%) would achieve the numerical values set out in the BRE guidelines. The one exception is a window that currently has restricted access to daylight due to being located at the rear of a recessed balcony and it also serves a room that is served by three other windows all of which achieve the guidelines. For daylight distribution, all rooms analysed would have over 90% of their area in front of the NSL and therefore achieve the BRE guidelines and will retain good access to daylight.
- 10.58 Morland House is located on the opposite side of the railway line from the site and provides residential accommodation at fifth and sixth floor levels. The result of both the VSC analysis and the daylight distribution demonstrates that all windows (100%) achieve the numerical values set out in the BRE guidelines and the property would retain good access to daylight.
- 10.59 The neighbouring properties with principal rooms served by windows facing within 90° of due south and therefore need to be considered are: Block A, 29-33 Victoria Road; 44 Victoria Road and Morland House.
- 10.60 At Block A, 29-33 Victoria Road, out of the 21 rooms considered, 18 (91%) will achieve the recommended APSH and during the winter months. And the remaining 3 are all located underneath balconies which currently restricts their access sunlight.
- 10.61 At 44 Victoria Road and Morland House, the results of the analysis demonstrate that all rooms (100%) considered will achieve the recommended APSH and during the winter months, as set out in the BRE guidelines.

Overshadowing

- 10.62 The assumed area of the communal courtyard to 29-33 Victoria Road, the analysis demonstrates that 30% of this area will achieve 2 hours of direct sunlight on the 21st March. Block A of 29-33 Victoria Road prevents the majority if not all of the area enjoying any access to direct sunlight until after midday. This demonstrates that a significant reliance is placed on the sunlight enjoyed over the site. The analysis undertaken for the 21st June demonstrates that when this area is most likely to be used, the proposals cast a minimal shadow and more than 90% of the area will enjoy 2 hours of direct sunlight.
- 10.63 Overall, as would be expected, the proposals would result in some impact on the daylighting/sunlight conditions of the surrounding development, however, the revisions to the proposal have appropriately minimised the impact such that it would now be negligible in significance.

Environmental and Climate Change Implications

- 10.64 At a national level, the NPPF sets out that planning plays a key role in delivering reductions to greenhouse gas emissions, minimising vulnerability and providing resilience to climate change. The climate change policies as set out in London Plan Policy SI 2, policy 36 of the Council's Local Plan collectively require developments to make the fullest contribution to the mitigation and adaptation to climate change and to minimise carbon dioxide emissions.
- 10.65 The submitted proposals have followed the London Plan energy hierarchy seeking to minimise CO₂ emissions through the implementation of energy efficiency measures, photovoltaic panels and a CHP system. No gas boilers have been specified for any part of the development.
- 10.66 For the residential element hot water and heating (radiators) will be provided by communal air source heat pump with top-up electric immersion heaters providing less than 20% of the hot water demand.
- 10.67 Heating in the form of radiators for the commercial element will be provided by air source heat pumps. Hot water will be provided by electricity at the point of use.
- 10.68 The CO₂ emission reductions are anticipated to be at 62.4% beyond the Building Regulations 2013, with 45% policy target. A S106 contribution for carbon offsetting has been secured to ensure that the policy target is met. A condition has also been included to require implementation of the development in accordance with the submitted sustainability and energy efficiency strategies.
- 10.69 Guidance under the NPPF seeks to safely manage residual risk including by emergency planning and give priority to the use of sustainable drainage systems. The indicative sustainable drainage measures have been submitted which would be considered to be acceptable with an appropriate condition requiring submission of full details has been included.

Biodiversity

- 10.70 Policy G5 of the London Plan sets an Urban Greening Factor (UGF) target score of 0.4 for residential development and 0.3 for commercial developments. The proposal provides a UGF score of 0.314. From the plans and details submitted, it is noted that a higher score is achievable by changing the extensive green roof to an intensive green roof; changing 50 per cent of the permeable paving to flower rich perennial planting and by providing a green native buffer at the rear of the site. Therefore further details would be required in order to achieve the target score of 0.4, via condition.

- 10.71 The site has no significant existing biodiversity value. The details within the Preliminary Ecological Appraisal do not adequately address potential bat roosts, however, this can be appropriately addressed through conditions.
- 10.72 To ensure that benefits for biodiversity are secured in the long term, an Ecological Management Plan for the expected life span of the development would be required and would include proposals for monitoring.
- 10.73 Connection with green infrastructure and SINC's in the area is important, and the soft landscaping would need to be designed to allow future connection with SINC's, in particular the railway bank west of Romford station. Therefore a condition for revised landscaping details will be attached to ensure a green buffer of sufficient depth at the rear of the site is provided of suitable native habitat.
- 10.74 Details of lighting would be secured by condition. The proposal would not result in any significant adverse impacts on biodiversity.
- 10.75 Having reviewed the documents submitted with the application, the Council's Environmental Health Officer has raised no objections in relation to any historical contaminated land issues, air pollution or noise subject to appropriate conditions.

Transport and Highways

- 10.76 The NPPF emphasises the role transport policies have to play in achieving sustainable development and stipulates that people should have real choice in how they travel. The London Plan seeks to shape the pattern of development by influencing the location, scale, density, design and mix of land uses such that it helps to reduce the need to travel.
- 10.77 Policies 23 and 24 of the Havering's Local Plan require that proposals for new development assess their impact on the functioning of the road hierarchy. The overriding objective is to encourage sustainable travel and reduce reliance on cars by improving public transport, prioritising the needs of cyclists and pedestrians and managing car parking. A Transport Assessment has been submitted with the planning application as is required for all major planning applications.
- 10.78 The site benefits from very good public transport accessibility (PTAL rating of 6a/6b), with convenient pedestrian access to bus connections on Victoria Road and within walking distance of the overground Station at Romford Station.
- 10.79 In accordance with policy, the development provides 70 cycle parking spaces for the residents and 12 cycle parking space for the commercial unit with 4

spaces for visitors. 4 wheelchair accessible car parking spaces would be provided and the development would be secured as 'car free' other than for future affordable housing residents benefiting from the operation of on street car parking permit. The number of wheelchair accessible car parking would comply with policy and would not be required to provide more spaces without significantly undermining the quality of the public realm.

10.80 Given the good public transport accessibility, the majority of trips would be undertaken on foot, by cycle or by public transport. The proposed development would not result in an adverse impact on the transport network, either on its own or in addition to the extant neighbouring scheme and TfL confirmed that the proposal would not give rise to public transport capacity issues.

10.81 Neither TfL nor LBH Transportation & Highways raise an objection to the scheme, subject to imposition of relevant conditions. The following conditions and planning obligations have been included as requested by consultees:

- Travel Plan
- Car free development
- Construction Management Plan
- Construction Logistics Plan
- Delivery & Servicing Plan
- S278 highway works agreement
- Cycle route improvement
- Review of existing parking
- Details of cycle storage facilities
- Provide flush kerbs to the carriageway arrangement
- Parking surveys 6 months after occupation

10.82 Adequate waste storage facilities would be provided within the development.

10.83 Overall, subject to conditions and S106 agreement, the proposal would not give rise to any unacceptable highway, transportation or servicing impacts.

Financial and Other Mitigation

10.84 The proposal would attract the section 106 contributions to mitigate the impact of the development as listed above in section 2.1 of this report. Currently, at this stage there is no policy requirement for an education contribution in addition to CIL. However there is a review with regard to future SPD on financial obligations to include Education.

10.85 The proposal would attract the following Community Infrastructure Levy contributions to mitigate the impact of the development:

- £370,387 LB Havering CIL
- £75,950 Mayoral CIL towards Crossrail

11 Equalities

- 11.1 The Equality Act 2010 provides that in exercising its functions (which includes its role as Local Planning Authority), the Council as a public authority shall amongst other duties have regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act;
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it
- 11.2 For the purposes of this obligation the term “protected characteristic” includes: - age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 11.3 Policy CG1 of the London Plan also seeks to support and promote the creation of an inclusive city to address inequality. In view of the stakeholders affected by the development proposals, the most significant impacts in this case relate to the protected characteristics of age, disability and gender. It is considered that there would be no communities falling under the list of “protected characteristics” that would be significantly or unduly harmed by the proposals.
- 11.4 Therefore in recommending the application for approval, officers have had regard to the requirements of the aforementioned Act and have concluded that a decision to grant planning permission for this proposed development would comply with the Council’s statutory duty under this important legislation.
- 11.5 In light of the above, the proposals are considered to be in accordance with national regional and local policy by establishing an inclusive design and providing an environment which is accessible to all.

12 Health Considerations

- 12.1 Policy S2 of the London Plan seeks to improve health and address health inequalities having regard to the health impacts of development proposals while the Council’s policy 12 of the Local Plan seeks to deliver healthy and liveable neighbourhoods that promote active and healthy lifestyles, and enhance people’s wider health and well-being.
- 12.2 The Health Impact Assessment supporting the application concluded that the proposal raises no unique health implications, and would not prejudice the opportunity of, residents, neighbours or members of the public to benefits from appropriate living conditions and live healthy and active lifestyles. The play space and communal amenity space proposed would be in excess of policy requirements.

14 Other Planning Issues

- 14.1 Concerns raised regarding distances between the site and adjoining property to the west not indicated on plans is noted, however, given that the plans were to scale, it would be acceptable. The security concerns raised will be dealt with by the SbD condition including recommendation to provide CCTV to cover all communal spaces both internal and externally for adequate surveillance.

14. Conclusions

- 14.1 The proposed development would contribute to boosting housing supply and delivery and this weighs in favour of the development. The assessment of the planning application has not identified significant harm nor conflict with development plan policies and where there is some harm/conflict identified it is considered that these do not outweigh the benefits of the proposal. Therefore, it is considered that in this case the proposal does benefit from the presumption in favour of sustainable development set out in paragraph 11 d) of the NPPF.
- 14.2 All other relevant policies and considerations have been taken into account. Planning permission should be granted for the reasons set out above subject to the attached conditions and completion of a legal agreement. The details of the decision are set out in the RECOMMENDATION.