



Havering
LONDON BOROUGH

**Strategic Planning
Committee
5 April 2022**

Application Reference:	P0615.21
Location:	Land at Rom Valley Way, Rom Valley Way
Ward	BROOKLANDS
Description:	<p>Hybrid planning application for phased mixed-use development for the provision of seven blocks (Block A to G) of 2 to 12 storeys to include up to 972 residential units comprising:</p> <p>Full application (Block A) for a total of 146 (70 x 1bed, 68 x 2bed, 8 x 3bed) flats (Class C3); 648sq.m of retail/restaurant unit (Class E), medical/neighbourhood centre (Class E(e)/F2); 149sq.m energy centre (sui generis); parking, access from the southern roundabout and temporary road access arrangements.</p> <p>Outline application for site preparation for erection of six blocks (Blocks B to G) of up to 826 residential units (Classes C3); up to 223 later living/extra care/residential units (Classes C2/C3); up to 2,726sq.m of medical facility (Class E(e)), flexible retail and cafe space (Class E), gym facilities for residents and NHS Staff (Class E), Medical/neighbourhood centre (Class Ee/F2); energy centre, basement, associated landscaping, car parking, refuse storage and other associated works with all matters reserved.</p>
Case Officer:	RAPHAEL ADENEGAN

Reason for Report to Committee:

- **The application is within the categories which must be referred to the Mayor of London under the Town and Country Planning (Mayor of London) Order.**

1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 1.1 This report sets out the detailed considerations for the major planning application on land at Rom Valley Way in Romford, a site known as the Former Romford Ice Rink. The principle of redevelopment of the former Ice Rink site has already been established through the granting of planning permission in 2018 for the development of the site to deliver 620 residential units and 830sq.m of flexible commercial space under ref: P1389.17. This permission has now expired. The new development is coming forward delivering greater densities appropriate to this location, supported by the London Plan and local planning policies.
- 1.2 The application is for the comprehensive redevelopment of the site for a mixed use development which is residential led and would deliver up to 972 new homes as well as new medical accommodation, retail and leisure floorspace, public and private open space, highways improvements, landscaping and other benefits. The following report will set out the material planning considerations as they relate to each main issue. The report will also give a detailed review of the proposed development as well as considering the potential environmental impacts, which can be positive or negative, as addressed by the submitted Environmental Impact Assessment and the accompanied Environmental Statement.
- 1.3 The approach to site layout, height and massing represents an acceptable approach given the location of the site. This initial scale and design was also reviewed by Members of the Strategic Planning Committee and the Council's Quality Review Panel.
- 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 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. The proposal is sustainable in terms of transportation and would not have undue impact on the visual character of the area.
- 1.6 The proposed development 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.

- 1.7 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.
- 1.8 Officers consider the proposal to be acceptable, subject to no contrary direction from the Mayor for London, the prior completion of a Section 106 legal agreement pursuant to the Town and Country Planning Act 1990 (as amended) and all other enabling powers and the planning conditions listed below.

2 RECOMMENDATION

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

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

:

Affordable Housing

21% of units (199.No. units Option A), (189.No. units Option B) as Affordable; Tenure split 66% intermediate shared ownership and 34% affordable rent Option A, 65% intermediate shared ownership and 35% affordable rent split for Option B, the housing option in terms of affordable rent is the London affordable rent.

24% affordable by habitable room

Early, mid and late Stage Viability Review Mechanisms to be applied;

10% of affordable homes to be constructed as wheelchair accessible;

- Phasing of Affordable housing delivery
- Affordable housing rent levels secured
- Shared ownership units maximum combined income £90,000
- Shared ownership annual housing cost no more than 40% of value
- Affordable housing breakdown and unit location
- Limitation on service charges for social rented units

Provision of Health Facility floorspace connected to Queens Hospital

- Reservation of site area and floorspace within Block F for NHS use for 6 years from the date of Planning Permission or 5 years from the approval of reserved matters for Block F, whichever is the later.
- Support to BHRUT business cases
- To use reasonable endeavours to establish a framework for delivering the facility
- To use reasonable endeavours to enter into Agreement for Lease
- Range of lease terms and rents to be set

Highways

- Active transport contribution towards Rom Valley Way/Oldchurch Road (including junction improvements, pedestrian and cycle path, pedestrian crossings and landscaping) improvements - £1.25million (discounted for any works carried out subject to the agreement of the Council as Highways Authority by the developer themselves);
- Financial contribution of £200,000 towards public transport infrastructure required by TfL;
- Provision of cycle/footway along eastern boundary of the site adjoining Rom Valley Way;
- The provision of 2 car club spaces on the site and 3 years free membership for future residents to the Car Club;
- Submission of Travel Plans covering the residential and commercial elements of the scheme. 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.
- Car free restriction on obtaining parking permits to be secured by agreement pursuant to Section 16 of the Greater London Council (General Powers) Act 1974;
- Upgrading works to Council car park in agreement with Council and subject to appropriate licence agreement;

Carbon offset

- Financial contribution of £1,162,080 (£183,600 phase 1 and £978,480 phase 2) (subject to full energy assessment). towards carbon offset schemes duly indexed;
- Connection to District Heating Network

Safety

- Implementation of lights on the taller blocks to guide helicopters accessing ground floor level helicopter landing pad for Queen's hospital;
- Enhanced way finding for hospital departments

Public Realm

- Requirement to obtain a management company to maintain the public realm and landscaped areas;
- Requirement to make the pedestrian route a pedestrian right of way;
- Requirement to assume liability over the pedestrian right of way;
- To submit and implement a scheme of improvements to provide a suitable areas to Oldchurch Park (including obtaining agreement of landowner of the park) to offset the shortfall of the Play Space on-site.

Employment and Training

The developer to submit to the Council for approval (including financial contribution), prior to commencement of the development, a Training and Recruitment Plan. The developer to implement the agreed Plan (including appropriate financial contribution)

The developer to use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development;
Job Brokerage 4 per 10,000sqm of development

Quality of Architecture/Design Development

- Design Competition for Blocks B and E
- Approval of team to ensure team has necessary expertise
- Design Monitoring Fee

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.

- 2.2 That the Assistant Director Planning is delegated authority to negotiate the legal agreement indicated above and that if not completed by the 31st August 2022 the Assistant Director of Planning is delegated authority to refuse planning permission or extend the timeframe to complete the legal agreement and grant approval.
- 2.3 That the Assistant Director Planning has delegated authority to issue the planning permission subject to the completion of the legal agreement and conditions [and informatives] to secure the following matters:

Conditions

1. Time Limit (phase 1 - application for detailed planning permission)
2. Reserved Matters to be Submitted
3. Timing of Reserved Matters Submission
4. Timing of Reserved Matters Commencement
5. Parameter Plans
6. Approval of Reserved Matters
7. Phasing Plan
8. Design Code
9. Existing and Proposed Site levels
10. Maximum number of residential units (972)
11. Partial Discharge – Allows for Phasing of development
12. Approval of Materials
13. Access to Phases
14. Accessibility and Management Plan - Residential
15. Accessibility and Management Plan- Non-Residential
16. Accessibility of Public Realm
17. Car and cycle park design management plan

18. Electric Vehicle Parking Provision and Charging Point
19. Occupier Cycle Parking
20. Visitor Cycle Parking
21. Travel Plan
22. Secure by Design
23. Accessibility and Adaptability
24. Provision of Amenity Space
25. Refuse Storage and Segregation for Recycling/Refuse Collection Strategy
26. Carbon Reduction- Residential
27. Carbon Reduction- Non-Residential
28. Energy compliance
29. Photovoltaic panels – Energy hierarchy
30. Energy Efficiency
31. Overheating – Phases 2 - 5
32. Overheating – Phase 1
33. Urban Greening Factor
34. Ecological Appraisal, Bat Survey Report and Environmental Statement
35. Biodiversity Enhancement Strategy
36. Landscape Management Plan (Including biodiversity benefits of the scheme which exceeds the minimum 10% recommendation in line with the London Plan)
37. Wildlife Sensitive Lighting Design Operational Scheme
38. Landscape and Ecological Management Plan
39. Further Surveys for Developments Phased over a Long Period
40. Landscaping, public realm, play space and boundary treatments
41. Living Roofs
42. Nesting Birds and Bat Roosts
43. Protection of Trees
44. Vegetation Clearance
45. Examination of Trees for Bats
46. Air Quality Assessment
47. Boiler and Combined Heat Power
48. Noise and Vibration (Class E use)
49. Kitchen Ventilation Equipment
50. Noise Assessment (Scheme of Glazing, Ventilation and Control for Thermal Comfort)
51. Sound Insulation
52. Noise levels from plant and machinery
53. Noise from Commercial Units
54. Noise from Entertainment
55. Hours of Operation- Non-Residential – 0700 to 2300 (Deliveries 0700 to 2100 – Excluding Sunday and Bank Holiday)
56. Hours of Operation- Outdoor Seating/Gathering Areas to Commercial/Community uses – 0700 to 2100
57. Lighting Strategy
58. Flood Risk
59. Sustainable Urban Drainage
60. Drainage Strategy
61. Drainage Maintenance
62. Piling (including vibration) Method Statement

63. Non-Road Mobile Plant and Machinery ("NRMM")
64. Oil Interceptors
65. Contamination Remediation Scheme
66. Unexpected Contamination
67. Construction Environmental Management Plan
68. Demolition and Construction Hours(8am to 6pm Mon-Fri, 8am to 1pm Sat, none Sunday and Bank Holidays)
69. Foundation Design
70. Permitted Development Withdrawal, including use classes restriction and fencing
71. Satellite Dishes
72. Fire Safety
73. Bird Hazard Management Plan
74. Outline Delivery and servicing plan for residential uses
75. Outline- Delivery and servicing plan non-residential uses
76. Daylight\sunlight
77. Glare
78. Cranes
79. Parking
80. Phase 1 - Delivery and servicing plan for residential uses
81. Phase 1 - Delivery and servicing plan for non-residential uses
82. Phase 1 energy strategy
83. Archaeology (Written Scheme of Investigation)
84. Archaeology (Display and Interpretation)

Informatives

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

3 SITE AND SURROUNDINGS

- 3.1 The application site is located within close proximity to Romford town centre and is within the Romford Strategic Development Area and the Romford Housing Zone. Site constraints that are of material relevance with the works proposed include; Contaminated Land; Landfill 250m Buffer; Area of Archaeological Significance; Aerodrome Safeguarding.
- 3.2 In terms of its local context, the application site lies southeast of Rom Valley Way (A125) dual carriageway which forms part of the Strategic Road Network ("SRN"). The application site is bound to the north by a public car park and to its west by Oldchurch Rise and Queen's Hospital. The southern boundary of the site lies adjacent to the hospital site access, also the main vehicular access point.
- 3.3 The surrounding buildings/uses are varied, a mix of residential, community, retail and small scale industrial uses surround the site. To the east of the site beyond Rom Valley Way lies a substantial retail park, residential dwellings and a small amount of industrial use lies further to the north and a substantial residential area is located beyond this further north of Oldchurch Road. Beyond the hospital further south lies more large areas of residential development.
- 3.4 The application site is rectangular in shape with a site area of approximately 3.17ha. The site has been vacant since the former Ice Rink on the northern half of the site (single storey building at 3300m²) was demolished, although some use as parking for the hospital takes place. The site is now largely hard-surfaced with some grassland and some trees/shrubs around its perimeter, and is relatively level (slight gradient from north-west to south-east).
- 3.5 The PTAL for the site ranges between 2(Poor) and 6a (Excellent) and within Flood Zone 1

4 PROPOSAL

Overview – Following the submission of the application and in response to concerns raised by officers regarding the quality of accommodation, legibility and overall living experience for future occupiers and users, the number of units (1,010 units) and massing have been revised by the applicant. The amended description of the proposed development, as it has been advertised is as follows:

- 4.1 Hybrid planning application for phased mixed-use development for the provision of seven blocks (Block A to G) of 2 to 12 storeys to include up to 972 residential units comprising:
- 4.1.1 Full application (Block A) for a total of 146 (70 x 1bed, 68 x 2bed, 8 x 3bed) flats (Class C3); 648sq.m of retail/restaurant unit (Class E), medical/neighbourhood centre (Class Ee/F2); 149sq.m energy centre (sui generis); parking, access from the southern roundabout and temporary road access arrangements.
- 4.1.2 Outline application for site preparation for erection of six blocks (Blocks B to G) of up to 826 residential units (Classes C3); up to 223 later living/extra care/residential units

(Classes C2/C3); up to 2,726sq.m of medical facility (Class E(e)), flexible retail and cafe space (Class E), gym facilities for residents and NHS Staff (Class E), Medical/neighbourhood centre (Class Ee/F2); energy centre, basement, associated landscaping, car parking, refuse storage and other associated works with all matters reserved. Although all matters are reserved, the outline planning application (OPA) sets out the following principles for the outline part of the site:

Use – the types of use or uses proposed for the development and any distinct development zones within the site identified;

Amount – the amount of development proposed for each use, in the form of floorspace or number of residential units;

Layout – an indicative layout showing the approximate location of buildings, routes and open spaces in the proposed development; and

Scale – the upper and lower limit for the heights of buildings, building setbacks and number of storeys;

- 4.1.3 As such, details of the layout, scale, appearance, access and landscaping of the development, other than those outlined above and set by the **Parameter Plans** and **Design Code**, are not under consideration at this stage and are to be considered under future reserved matters applications. Subject to the acceptability of the proposal as currently proposed, the above documents would provide a framework for these subsequent details to be prepared.
- 4.2 It should be noted at this point that phase 1, that is to say predominantly the part of the site to the south west of Rom Valley Way, namely Block A, including temporary access, is fully detailed at this stage of determination. That means that, should Members be minded to grant planning permission, the details that are before the Committee would be fixed for phase 1.
- 4.3 Phase 2 to 5 comprising Blocks B to G (with the exception of Block F which forms part of Phase 1), that is everything else on the site, is shown indicatively on many of the plans and documents that have been submitted with all matters reserved at this stage. Should planning permission be granted for these phases then the Committee would be agreeing to a set of parameters and principles on which a future detailed planning application would be based as contained in the submitted Parameter Plans. Design Codes (Building and Landscape) have been submitted for phase 2 – 5 and would become approved documents.

Description of the Development

Phase 1, Block A

- 4.4 Block A comprises 146 residential dwellings (70 x 1bed, 68 x 2bed 8 x 3bed flats), flexible retail and restaurant units (648sq.m, Class E), a neighbourhood/medical centre (187sq.m, Class E(e)/F2) and an energy centre (149sq.m, *Sui Generis*) that will also serve the wider development (total floorspace 14,200sq.m). Block F is proposed to commence, in part, in this phase.
- 4.5 The building will be between 2 to 10 storeys in height and will include new areas of public realm and landscaping, including the new neighbourhood centre, private

amenity space in the form of balconies and communal roof terraces for residents. Block A has been updated to include the addition of a delivery station for the commercial units for the deposit and collection of online deliveries for residents. The number of car parking spaces has also been updated with 10 spaces (from 17) for residents. The six Blue Badge spaces and two car club spaces previously proposed have been maintained. The building and others blocks will also have cycle parking facilities in compliance with the London Plan

- 4.6 Block A will be accessed from the south via the existing roundabout on Hospital Way. The overall highways and servicing strategy for the wider scheme will involve access from the Oldchurch Row car park to the north. As this is included in the outline component of the development, secured through the subsequent Reserved Matters, a temporary vehicle turning area for Block A has been included in the detailed component. The temporary construction access will be taken off Rom Valley Way in-between future Blocks D + E.

Phases 2 – 5, Blocks B to G

- 4.7 This is the outline component of the application. Primarily residential-led, the outline parameters proposed include up to 826 residential units, the new NHS medical facility, gym and retail unit. Block G will also have the option of coming forward as an extra care later living residential care facility with up to 223 units and associated communal and treatment facilities. All matters are reserved for phase 2, although it should be noted that design codes for the six buildings and landscape have been provided by the applicant, as well as maximum and minimum parameters for the proposed buildings in these phases.

- 4.8 The proposal varies in height and a range of maximum and minimum heights are outlined on the submitted parameters plans. It is intended that Block G will be between 5 and 10 storeys, whilst Blocks C and D located towards Rom Valley Way will be mainly 8 storeys. The scheme includes two local landmarks Blocks B and E, which are respectively up to 10 and 12 storeys in height. It is intended that the final design of these two blocks will be subject to architectural design competitions.

- 4.9 In addition, there will be extensive landscaping and public realm across the site. Local connectivity and permeability will be enhanced with new routes across the site and parks sheltered from the activity along Rom Valley Way.

Access and Routes

- 4.10 The accompanying Design & Access Statement and Design Code outlines that there are two main options for the development layout depending on whether a revised access point can be delivered from Oldchurch Rise car park to the north:

Option A: new access point is implemented allowing a straight link to the spine road that will run through the development north/south. As illustrated, this option will facilitate an additional core to Block F, enabling it to be a perimeter block layout. This option would have up to 967 (this is due to inclusion of five duplex units) units (although the applicant is still seeking flexibility to increase total numbers to 972).

Option B: retain the existing access point from the car park. As a result, Block F will have three rather than four access cores and the number of residential units delivered will decrease. This option would have up to 927 units.

- 4.11 The submitted masterplan architectural and landscape drawings illustrate Option A as a maximum scenario; however, the road and public realm work and landscaping delivered under Option B would be in-line with these details.
- 4.12 The total number of residential car parking spaces has been decreased from up to 152 spaces to 75 spaces.
- 4.13 *Overall Parking:* The number of car parking spaces to be provided on site has reduced from up to 171 parking spaces to up to 93 parking spaces. This figure includes 31 Blue Badge spaces and two car club spaces. If Later Living is provided in Block G, the number of parking spaces will increase to 160 and comprise 35 Blue Badge spaces and two car club spaces.

Overall Amount of Development Proposed

- 4.14 The table below sets out the development floorspace applied for under each use class, which would be the maximum amount that could be provided across the development under the full and OPA:

Use Class	Total Amount	Type of Use
Retail (Class E)	995sq.m	600sq.m Flexible Retail, 395sq.m Restaurant and neighbourhood centre
Non-residential institutions and assembly and leisure (E(e)/F2/ancillary C2)	3,055sq.m	2,726sq.m NHS Facilities 329sq.m Gym and SPA
Residential institutions (C2)	223 Units	23,221sq.m Later Living
Residential (C3)	972 Units	64,287sq.m Duplexes and flats
Energy centre (Sui Generis)	149sq.m	Energy Centre
Others (Sui Generis)	739sq.m	469sq.m Substations and plant rooms, 194sq.m Bin compactor and office, 76sq.m Delivery station
Parking (blocks A, C, G)	5,251sq.m	Parking
Total	97,697sq.m	

Phasing

- 4.15 The development would come forward on a phased basis, which is expected to take up to 10 years. There would be 5 phases of development (set out on the plan below), although phase 1 would be split into 2:

Phase 1: Blocks A + F – Block A is within the Detailed Application. Block A will set the key principles for the later blocks in this format (Blocks C and D). It houses the Neighbourhood Centre/Health Centre, Retail and Energy Centre.

Block F has the **NHS clinical support space** within the 2nd floor core allowing this to be built independently to the rest of the block if required. Block F is mixed tenure with Intermediate (Social Rent) Housing within the 1st floor core and Affordable Housing within the 3rd and 4th floor cores (Option A 163 units, Option B 119 units).

Phase 2: Blocks E + G – Blocks E and B are meant to be Gateway Stand Alone blocks. These blocks are designed to be markedly different to the other blocks in terms of form and materials. They give a clear townscape signal as to where the main access points on Rom Valley Way are. **They will also be the basis for an architectural competition to pick the final version of each.** Block E houses a local need retail provision at the northern entrance/exit of the site (Option A 80units, Option B 80 units).

Block G is the Later Living or Market for Sale accommodation (Option A 223 units, Option B 223 units).

Phase 3: Block D – Is located in the middle of the development. Its residential ground floor ties in with the Central Park (Option A 163 units, Option B 147 units)

Phase 4: Block B – This block has the Resident's/NHS gym at the base and market for sale units above. It will also be the basis for an architectural competition to pick the final version same as block E. (Option A 56 units, Option B 56 units)

Phase 5: Block C – The layout follows the C-shape but with duplex units extended on the south west corner and live-work duplexes onto the North East façade on to Rom Valley Way. It has parking below a podium for immediate Resident's' amenity, accessible from all cores. (Option A 149 units, Option B 149 units).



Fig 1: Phasing Plan

5 PLANNING HISTORY

5.1 A planning history search revealed an extensive planning background, as this application seeks the complete re-development of a particular site, the specific historical permissions issued to the land in question are not considered overly relevant in this instance, except for:

- Z0001.20 – Request for Environmental Impact Assessment Scoping Opinion – Scoping opinion issued 3 July 2020.
- P1389.17 – Redevelopment of the site to provide 620 Residential units (use class C3) and 830sqm commercial floorspace (use class A1/A3/D1) in buildings extending to between 4 and 8 storeys in height together with associated car and cycle parking, hard and soft landscaping and infrastructure works. Application approved on 22/08/.2018, permission now lapsed.
- Full application submitted under planning reference: P0732.13 for 'Change of Use of existing ice rink car park to a public pay & display'. Application approved on 23.07.2013 for temporary period which expired on 31.12.2015.
- Full application submitted under planning reference: P1468.12 for 'Proposed food store within Class A1 (retail) use, petrol filling station, associated parking and landscaping, alterations to existing access to Rom Valley Way and formation of new access/egress on to Rom Valley Way; and outline planning application for a residential scheme of up to 71 units comprising a mix of 3 bedroom town houses and two blocks of 1 and 2 bed flats (access only to be considered)'. Application approved on 18.12.2013, permission now lapsed.

- F0002.12 – Prior approval request for the proposed demolition of Rom Valley Ice Rink
- Z0011.12 – Screening opinion for Environmental Impact Assessment for demolition of Rom Valley Ice Rink. EIA Not Required 28 August 2012.

Pre-Application Discussion

Prior to the submission of this planning application, the applicant has engaged with LBH planning and design officers over 2 years. Officers agree that the site comprises previously developed land and the principle of a mixed-use residential led development is acceptable subject to the application submission demonstrating that density, massing, height layout, access and landscaping are acceptable. In respect of the design of the proposals, the scheme has also been subject to post submission discussions with Officers as well as two reviews by the Quality Review Panel. Officers expressed throughout the pre-application process that the quantum of development, layout arrangement will carry significant weight in the determination of an acceptable proposal.

The proposals have evolved considerably since being presented to the QRP. A number of positive changes to the overall masterplan concept have been incorporated into the final scheme, whilst a number of the detailed elements relating to the detailed part of the application (Phase 1) were made to the scheme prior to submission, as well as further amendments post submission with the council's design officers. As such the scheme has evolved with positive changes following the Quality Review Panel in order to address comments that were made.

Summary of QRP Comments and Response from Applicant

QRP Comment	Officer Remark
<p>The panel does not feel able to comment in detail on the blocks themselves as, without information on the internal arrangement of units, it is difficult to form an opinion on their likely success. However, it is concerned that the configuration of the blocks proposed might lead to too many single aspect units, many of them facing onto roads or car parking.</p> <p>Covid-19 has illustrated the importance of dual aspect accommodation, which offers functional benefits such as cross ventilation, light and the potential for more interesting outlooks. Therefore, the ambition to create a relatively high proportion of dual aspect units here is welcome. However, the panel challenges whether all of the units described as such are in fact genuinely dual aspect.</p>	<p>The buildings have been redesigned to deliver approximately 71% dual aspect units. This level is considered reasonable in the context of the site. Officers will continue to improve on this as part of the reserved matters.</p>

<p>The fundamentals of the masterplan are largely in place, and the revised massing is successful. The panel also welcomes the reduction in heights across the site. However, much of the details on materials, elevations, and landscaping is still absent, even for the first phase elements.</p>	<p>Details of materials for the detailed application are found satisfactory. Those for the outline are contained in the Design Code and are still subject to consideration under reserved matters. Materials are secured conditions..</p>
<p>Furthermore, the panel feels that the number of homes envisaged for the site is simply too high to allow for the creation of a high-quality neighbourhood.</p>	<p>The overall quantum has reduced from 1,010 to 972 units. The scheme provides high quality public realm and amenity space which is demonstrated in the in the accompanying DAS.</p>
<p>The panel is supportive of the principle of creating two landmark blocks (Blocks B and E) to frame the site but feels that the buildings proposed do not yet achieve this ambition.</p>	<p>The design of Blocks B and E have been subject to ongoing discussions with officers. The applicant is committed to an architectural design competition for the detailed design of the Blocks</p>
<p>Further thought needs to be given to the permeability of the site during the whole life of the scheme's construction, given its position in relation to the hospital.</p>	<p>The permeability have been substantially enhanced. Officer are satisfied with the improvements proposed.</p>
<p>The panel feels that while improvements have been made to the scheme since the previous review, much more time will be required to develop the level of detail required to make a hybrid application within the timeframe proposed.</p>	<p>The application was submitted 4.5 months following the QRP and since March 2021, discussions have been ongoing with the LBH on the proposal with design advancements leading to a subsequent resubmission in December 2021. The application is accompanied by a Design Code that will dictate the type of building blocks including access points and circulation as well as turning circles.</p>
<p>While the level of ambition for the scheme's environmental performance are laudable, the panel would like to have seen evidence of work to ensure that these ambitions will be realised in practice.</p>	<p>A suite of technical reports has been submitted, and subsequently updated for December 2021 resubmission, which demonstrate the scheme's high environmental performance</p>
<p>Further, the panel feels that there needs to be much greater evidence that robust studies of daylight, wind effects and overheating have been undertaken across the scheme, and are informing the design work.</p>	<p>The application is accompanied by a Daylight and Sunlight Report and The Environmental Statement includes information on wind effects and is set out in the Microclimate (Wind) Assessment. The conclusion if these documents are contained in the content of the report.</p>
<p>The panel feels that the impact of the scheme's layout on pedestrian and cyclist movement through to the hospital need much more detailed analysis, not least in the context of wider changes to the surrounding area.</p>	<p>Two new cycle routes have been proposed which addresses this.</p>

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
A continued concern about the unit mix for the scheme and the low level of 3 bed units with reassurance that the mix proposed was right for the borough's needs.	The scheme has reduced by between 100-140 units since SPC1 and 38 units since the application was submitted in March 2021. Despite this, the number of 3 beds have remained steady. 100% of AR are 2 and 3 beds and 69% are duplex or 3 beds.	Officers consider the level of 3bed units to commensurate to the viability and deliverability of the development in its context and location. Officers have been able to maximum the amount of affordable family units to meeting the borough's housing needs.
Member would welcome a small uplift in 3 bed units	A 'Senior Housing Planning Needs Assessment' prepared by Knight Frank was submitted in support of the application in March 2021	
Members sought clarification if there was a market need/local demand for intergenerational living.	A 'Senior Housing Planning Needs Assessment' prepared by Knight Frank was submitted in support of the application in March 2021	Evidence provided by the applicant and supported by the Council's Housing Team shows there is a need for this type of accommodation in the borough. The inclusion of Later Living option will enhance and ensure a vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations
Whether there was the potential to lower the heights of the 12 storey blocks.	Block E massing has been reduced to 10 storeys on 50% Block B, is stepped at 6 storeys for 50%, with the balance at 10 storeys only. Both Blocks pivot inwards on their cores to reduce the visual impact of their mass from Rom Valley Way.	The height, massing scale as contained in the Parameter Plan have been negotiated with officers.
Further details were sought about nearby existing school capacity to ensure that sufficient school places would be available to meet the child yield for the scheme.	An 'Education Report' prepared by EFM was submitted in support of the application in March 2021. The robust report demonstrated that there are plenty of spaces for the development.	The proposal will result in additional school places. This will be offset by way of financial contribution through CIL payment. According to the Council's Education Dept., the scheme does not trigger the need for a new school.
Whether there was the opportunity to increase car parking.	The Developer has sought to strike a median line between the desire for the GLA for 3% only. The main car parking provision will be for Later Living.	The development has been developed as a car free scheme due to its proximity to Romford Town Centre and its high PTAL rating. The level of parking

		proposed is in line with London and Local Plan policies.
A wish to ensure modelling was undertaken to understand the impact of the development upon the junction where buses turn into Queens Hospital. What will be the impact of the development?	Detailed assessment work was undertaken as part of the original submission. Following comments from TfL on the modelling, a revised assessment has been undertaken and submitted which identifies that there is no impact arising from the development proposals at this junction – this is consistent with the findings of the original submission.	Both TfL and the Highways Authority have no fundamental objection to the proposal. All highways mitigation measures are secured by S106 legal agreement and conditions.
Members sought further information regarding management of site and related service charges.	<p>The Activation Strategy provides quite detailed information in respect of Impact Capitals long term interest in Rom Valley Gardens, the proposed management structure and the on-site management approach. It also explores funding and additional income opportunities for the activated spaces and clarifies that Impact Capital are completely motivated to be fully responsible for the ownership and operation of Rom Valley Gardens and that they understand their obligations through each phase of delivery.</p> <p>We hope it is clear from the information in the Activation Strategy that a significant amount of thinking and planning has already taken place regarding the delivery of a well serviced and affordable scheme and we are committed to embedding exemplary Estate Management principles into each stage of the project including design, planning, construction and occupation.</p> <p>A detailed service charge budget and methodology for apportionment will be developed by SAY as the design progresses and through a careful Design for Management process, the design will be</p>	This is to be secured by conditions and legal agreement.

	<p>influenced by the budget and vice versa.</p> <p>A stark reality is that future essential changes in statutory requirements means that the cost of building management is increasing, as are costs such as energy, insurance and salaries, so it is critical that careful consideration is given to the design and operational efficiency in order to mitigate the risks associated with service charges that are unaffordable.</p> <p>The scale of Rom Valley Gardens delivers opportunities to benefit from economies of scale, particularly with a "one team" approach on site (as proposed in the Activation Strategy) but we also recognise that the complex mix of tenures and uses will require more intensive management to deliver a cohesive and evenly balanced management service. We are conscious that the level of service charge will be a critical issue for other key stakeholders and partners.</p> <p>A fair use apportionment method will be applied across tenures and service charges will be benchmarked against other local schemes such as Waterloo Road as well as a broader range of similar mixed-use schemes.</p>	
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Following previous Pre-App and QRP comments, the design team attended a post submission meeting with Council urban design officers to address previous concerns raised. Through this process the design team made 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.

Environmental Impact Assessment (EIA)

The development falls within the thresholds set out in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA

Regs), whereby an EIA is required for the purposes of assessing the likely significant environmental effects of the development. A Scoping Opinion was issued by the Council on the 3rd July 2021, commenting on the approach and methodology for assessing the impact of the following environmental topics:

- Transport;
- Air quality;
- Noise and vibration;
- Ground conditions;
- Water;
- Ecology;
- Wind;
- Landscape, townscape and visual amenity;
- Socio-economic;
- Archaeology;
- Waste management; and
- Climate change and renewable energy.

An Environmental Statement (ES) has been submitted as a supporting document to the application, which includes environmental information under the above topics. Officers are satisfied that this complies for the purposes of Regulation 3 of the EIA Regs and detailed consideration of this information is undertaken in the below appraisal sections.

Community and Stakeholder Engagement

A Statement of Community Involvement (SCI) 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 and an online presentation was conducted due to Covid-19 restrictions, where questions and comments could be posted and recorded.

The applicant's response to the issues raised in the course of the public engagement contained in the SCI is as follows:

1. Concern over adding more houses to the area

The Site sits within the Strategic Development Area within the emerging Havering Local Plan. As such, it is envisioned that there will be large development projects in the area and thus the Applicant's plans match the ambition to develop the area. On top of this, the potential for key worker housing is evidence of the Applicant's ambition to make the latest application a better deal for Romford. As is covered more below, the Applicant has also worked with the Hospital to create potential for 3,000sqm of clinical floorspace, which could be used as office and consultant space.

2. Concern that development will sprawl into town

The project team has worked to ensure that the proposals will contribute positively to the surrounding area. Not only will the plans yield a net gain in accessible public realm, but there will also be a trim trail and gym which can be used by residents of the development and NHS workers. The plans also allow for space which can be used by Queen's Hospital. The Hospital has reserved up to 3,000sqm. This offers the potential to ease the pressure on space within the hospital by providing additional clinical space and benefiting the whole community.

3. "Appreciation of the health focus put forward by the Application"

Comment welcomed by the project team. A focus on healthy lifestyles complements the neighbouring Hospital and the incorporation of trim trails and extra open space into the design.

4. "Should I presume your "green" building will cater for the wildlife that already occupies the area including hedgehog highways and nest sites for swifts etc. built into the housing as that seems to be common practice in new housing estates by the bigger and better builders."

Existing habitats that exist in the locality of the site, specifically along the River Rom corridor which will be protected and enhanced within the proposals. Further to this, the Applicant will be adding a tree-lined wellness trail to the Site and offering a central village green. This taken, in conjunction with the care to protect existing habitats and the potential provision of bug hotels on the roofs, demonstrate the effort taken to increase biodiversity.

5. "Concerns around the height of buildings"

The team has worked hard to create a scheme which sits within its landscape - with the eight / nine storey hospital to one side and the emerging plans for much taller developments alongside. The design has been updated to reduce the overall height while maintaining the benefits of the overall scheme. We are restricting car parking onsite due to proximity of bus and train stations, minimizing emissions generated by residents of the scheme.

Changes made to the scheme as a result of Public Consultation

- Overall height reduced across scheme
- Break down of the massing
- Creating a green spine link to Oldchurch Park
- A central Park
- Reduced Parking
- Landmark buildings bookending site
- Duplexes added to green street
- Delivering up to 972 new homes

- New outpatients' clinician consulting and MRI diagnostic hub
- A car free gym for NHS staff and residents

6 CONSULTATION RESPONSE

6.1 Statutory and Non Statutory Consultation

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

Greater London Authority Stage 1 Response (21-6-21)–

London Plan policies on social infrastructure, housing, affordable housing, urban design, transport and sustainable development are relevant to this application. The proposed residential-led mixed use redevelopment could be acceptable subject to the maximum level of affordable housing being secured and improving the design quality. The application does not currently comply with the London Plan as summarised below:

Land use principles: The residential-led phased redevelopment of this brownfield site to deliver new housing, extra care units, social infrastructure and flexible retail/restaurant uses is supported in principle given the highly accessible, edge of town centre location and the local site allocation. Evidence demonstrating an identified need, and/or support from Clinical Commissioning Groups (CCGS) or other NHS must be provided for the proposed medical centre (paragraphs 19-27).

Affordable housing: 22% affordable housing by habitable room (30% London Affordable Rent and 70% shared ownership) is currently unacceptable and should be significantly increased. GLA officers will robustly interrogate the applicant's and the Council's viability assessments to ensure that the maximum amount of affordable housing is delivered. Grant funding should be explored. Further information is required on the affordable rent levels, income triggers, the phased delivery of the affordable homes and review mechanisms (paragraphs 32-42).

Urban design: The proposed development falls short of the design quality expected for a high-density scheme. The urban design rationale for locating tall buildings in this location needs to be more fully developed in line with London Plan Policy D9C. Further detail is required in terms of the detailed design of Blocks A and E, character areas, the functional impacts of the development and key townscape views (paragraphs 43-60).

Transport: A reduction in car parking with a review mechanism is required. Further information of improvements to connectivity and active travel opportunities to Romford Town Centre and cycle parking design must be provided. A financial contribution of £180,000 (see revised figure in TfL comments below) is required to reconfigure the highway, increase bus stop provision and introduce pedestrian crossings (paragraphs 61-70).

Further information on ***air quality, energy, whole lifecycle carbon, circular economy, sustainable drainage*** and ***urban greening*** is also required.

Recommendation: That Havering Council be advised that the application does not yet comply with the London Plan, for the reasons set out in paragraph 86 of this report; but that the possible remedies set out that paragraph could address these deficiencies.

Transport for London (TfL)–

- A contribution of £200,000 indexed up in order to reconfigure the highway layout in the area, increase bus stop/stand provision and introduce zebra crossing(s);
- Deficiencies in modelling should be rectified and proposed mitigation (signals) revisited and amended as necessary, in discussion with TfL;
- Adjustments to car parking provision and a mechanism to peg levels permitted at reserved matters stage to submitted evidence at the time and then current policy;
- More information and drawings to demonstrate compliance with the whole of LP T5 and not just its quantity standards;
- Better demonstration of how the development will help deliver improved connectivity and more attractive active travel opportunities to Romford and not just the site and its edges.

Several TfL concerns remain to be addressed in whole or in part. More detail and clarifications are required in regard to car parking, cycle storage, signalling and obligations and amendments are still needed to enable compliance with London Plan transport policies.

LBH Education – This proposed development is expected to generate 161 early years children places. Childcare Sufficient Report 2019 – 2021 states that there is sufficient early years in the Brooklands ward.

The proposal will generate 158 primary aged children. We are projecting a deficit of school places in Romford areas from 2021/22. We therefore seek financial contribution towards the cost of creating the additional school places required as a result of this housing development.

The proposal is expected to generate 46 secondary aged children. There is sufficient secondary places in this planning area. There is sufficient post 16 places available in Havering.

£2,862,012 (through CIL payment) contribution towards the cost of creating additional primary school places is required to meet expected demand from this housing development.

LBH Highways – No fundamental objection.

LBH Environment Health – (Noise) Having considered the noise report submitted in support of the above application, I recommend refusal on noise grounds unless the following conditions can be attached and enforced.

Officer comment: Noted and appropriate condition and informatives recommended

LBH Environment Health – (Contamination) The site is located on a historic landfill (Oldchurch Park). I recommend our standard contaminated land as a precautionary conditions should approval be granted.

LBH Environment Health – (Air Quality^{1st} response) - The development is located within a designated Air Quality Management Area (AQMA) due to high concentration of nitrogen dioxide and particulate matter. Based on the submitted Air Quality Assessment, no fundamental objection to the proposal subject to condition.

Officer comment: Noted and appropriate conditions and informatives recommended

LBH Ecology Consultant –

There is no ecology chapter in the Environment Statement; however, we have reviewed the Preliminary Ecological Appraisal (Greengage, December 2021) and the Biodiversity Report/Biodiversity Net Gain Assessment (Greengage, revised March 2021) relating to the likely impacts of development on designated sites, protected species and Priority species & habitats and identification of appropriate mitigation measures.

We are satisfied that there is sufficient ecological information available for determination of this application. No fundamental to the proposal subject to applicable conditions.

LBH Landscaping Consultant – We are satisfied proposed level of tree planting and, subject to further details coming forward regarding species and installation size, believe the provision to be sufficient. We welcome the spatial structure and landscape principles proposed and generally have no objections to the landscape concepts proposed. The submitted Design code provides a framework of control to inform any future reserved matters application.

Officer comment: Noted and appropriate condition and informatives suggested

LBH Heritage Consultant – The proposed development is not considered to affect any statutory listed building or Conservation Area.

LBH Waste Management –

Option A vehicle tracking MA3169.1000 looks like it will work to Service URS. The waste strategy is still dependant on FM taking waste from bin stores to URS as we were told would be in place in the meeting.

NHS (CCG) – We have run the HUDU Planning Obligations Model to calculate the cost of mitigating the impact of the development on local health infrastructure through providing additional capacity. This is in line with the London Plan (2021) which sets out the HUDU Model as the methodology to be used by boroughs. This calculates the cost of mitigation as up to £3,586,487.

However, given the opportunity for the Queens Hospital to expand capacity within the development site this would be the priority for the CCG and BHRUT NHS Trust at this time with the commitment to work closely with the Council to ensure that capacity across all health infrastructure can be expanded alongside population growth through bids for NHS funding, developer contributions and other funds when available.

The Local Plan recognises that Queens Hospital as the principal hospital for the borough is already facing increasing pressure and needs to urgently expand capacity.

The Environmental Statement advises that health infrastructure was scoped out of the EIA. However, there is a section on primary care provision but this includes errors in the methodology and assumptions. We can provide further evidence regarding health infrastructure needs, however, at this stage, the imperative has been to respond in as timely a manner as possible. The requirement for the health space for BHRUT is already established and it is now important to demonstrate it can be provided on a sustainable basis to the Trust which is vital at this stage.

As the CCG advises “The application represents a unique opportunity to help the NHS to meet the secondary care need for future populations as the application site is located direct in front of Queen’s Hospital. This is outlined in more detail in a letter BHRUT have previously sent to the council” And “supports the application but to ensure the healthcare space is deliverable would ask for the rental to be set at peppercorn level and that this is included in the s106 obligations for the site”.

The current S106 agreement heads of terms do not include the provision of the floorspace for BHRUT NHS Trust. As both the NHS Trust and the CCG have set out the space made available is required to be at an affordable level -at a peppercorn rent if the NHS is to seek the fit out costs for the building from elsewhere. The developer would have to build the “shell and core” of the space as part of the overall development and therefore this is not considered a “contribution to health care”. There are examples of schemes where developers have fitted out the health space ‘ready for occupation’ and let this at a peppercorn or nominal rent and this would be the ideal scenario. Health infrastructure is very much an “anchor use’ providing essential infrastructure, valued employment opportunities, and a positive ground floor use in the context of boroughs facing increasing vacant retail and other commercial uses detracting from the amenity of developments.

British Gas (Cadent) – There is apparatus in the vicinity of the site which may be affected by the activities specified. The LPA should inform as soon as possible, the decision your authority is likely to make regarding this application. If the application is refused for any other reason than the presence of apparatus, we will not take any further .

NATS – The proposed development does not conflict with our safeguarding criteria.

London Fire Brigade – No further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.

Environment Agency – The previous land use at this site suggests the potential presence of contamination. As the site is situated in a vulnerable groundwater area on a secondary aquifer these proposals need to be dealt with in a way which protects the underlying groundwater. Please therefore take note of the following advice.

Thames Water – (Foul Water) Thames Water has been unable to determine the foul water infrastructure needs of this application. As such, imposition of pre-occupation conditions (foul water capacity, infrastructure phasing plan.

(Surface Water) No objection based on the information provided.

We would expect the developer to demonstrate what measures that will be undertaken to minimise groundwater discharges into the public sewer.

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

Historic England (GLAAS) – The application site is divided between areas of very low archaeological potential and higher potential that avoided quarrying. The development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. As such, a two stage archaeological pre-commencement condition could provide an acceptable safeguard. .

Officer comment: Noted and appropriate condition and informatives suggested.

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 396 consultation letters were sent to neighbouring properties regarding this application.
- 8.3 251 representations (213 support, 36 objection, 1 comment and 1 no comment) 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:

Support

- i. Due to overpopulation people are struggling to be homed
- ii. Busy area and it is helping people out
- iii. Support provision of more new homes; will improve the area.
- iv. Not enough homes in the area
- v. It is too hard for any young people for affordable homes in Havering.
- vi. Hard to get on the ladder this will lead to more options for younger people.
- vii. Great to hear that we are pushing for this as there is too much push back on housing development

- viii. There are 2000 people on waiting lists. I would like more available homes in the area.
- ix. It would be great to have affordable housing in Romford, am in full support of that
- x. I would like to stay in the area and having more availability will help with that
- xi. Helping working Key workers get on the ladder. This would be helpful in this area.
- xii. more homes the better - this helps the economy
- xiii. .
- xiv. The area is currently run down i think new homes would make a vast improvement

Objection

- xv. The high rise I believe that it will take out natural sunlight from our garden on Oldchurch road.
- xvi. Excessive density; overdevelopment of site
- xvii. This scheme will potentially have a great social as well as environmental impact upon this area concerned
- xviii. Proposal will add to the congestion in the area
- xix. The more we build the less access to schools, doctors, hospitals. Too many "homes" and not enough infrastructure to support it.
- xx. concerned about the modular build design
- xxi. There is little greenspace provided and no education or healthcare provision. Where do the inhabitants go to schools or which healthcare services can they make use of.
- xxii. Poorly designed development with a lack of space for building users giving poor circulation space and no open space feel.
- xxiii. No obvious space for children to play
- xxiv. Over development of the town centre
- xxv. To many Tower Block ideas, you want to let developers do what they want not what we want the people who live in Romford
- xxvi. It looks ugly
- xxvii. We need more green space for affordable clubs and places for our children not more buildings
- xxviii. Our client's site at no. 69 Oldchurch Road, adjacent to the application site, benefits from an implemented planning permission for 34 new homes and is currently subject to pre-application meetings with Officers at London Borough of Havering to optimise housing delivery in line with latest policy objectives. The current proposals for the redevelopment of the former Ice Rink site will have a significant material impact on the deliverability and living conditions of the approved and implemented scheme at no. 69 Oldchurch Road and on proposals to optimise housing on the site. The proposed height, bulk and massing of the former Ice Rink redevelopment demonstrably fails to take account of the approved layout of no. 69 Oldchurch Road and will have a material impact on the residential amenity of future occupants (loss of light, overlooking and loss of privacy).

Romford Civic Society –

- xxix. The Society continues to feel that there is insufficient coordination between this proposal and other proposed development in the area and that, consequently, the development would result in a piecemeal and chaotic environment which would be to the detriment of the quality of life, health, sense of safety and economy in

the town. The proposed development does not make a coherent contribution to greatly improved biodiversity and ecosystem in the town. We remain concerned at the durability of the modular build method proposed.

Comment

- xxx. Please ensure they are low maintenance brick exterior, no dangerous cladding that gets dirty, no stuck-on wood that's never maintained, no exposed breeze-block exterior that leaves buildings looking unfinished.
- xxxi. Secured bin chutes for general rubbish and recycling waste, so no need for wheel bins or rubbish carts on site and easy for bin men to collect from just a few central spots through a central utility access road, which can also be used for taxi drop-off, home deliveries, removal vehicles etc

Representation - Barking, Havering & Redbridge University Hospitals NHS Trust-

- xxxii. As the Council is aware, the Trust overall and Queens Hospital specifically, currently has significant capacity shortfalls and lacks space to provide critical services that must be delivered from an acute setting and therefore there is a pressing existing need to secure more space and/or reorganise space to accommodate existing shortfalls in capacity. This is felt particularly in the emergency and urgent care services and the Emergency Department facilities at Queen's Hospital. Indeed, a Business Case for a health care development at another site within Havering sets out the serious capacity and sustainability issues within the local health system, stating:

“its fundamental imperative is to address the critical capacity issues within Queen's Hospital. ... [the new development] would enable renal dialysis services to vacate the hospital and create essential space to expand ED services. It is also essential to the establishment of a Frailty Hub that would provide support services in the community which would reduce ED attendances, support the reduction in admissions of the elderly and frail and allow patients to be safely discharged home where they can be cared for in the community through the Frailty Hub. Without the additional capacity provided by the H&WH, Queen's Hospital faces a challenge to provide adequate emergency services.”

The Hospital lacks capacity to provide critical services that must be delivered from an acute setting and notably ED targets are poor due to lack of accommodation. There is an existing need to reconfigure the acute services at Queens Hospital, Romford to accommodate current pressing health needs, without significant future capital investment.

The existing health care property estate in Havering especially has critical operational constraints, including existing capacity shortfalls and new or expanded health facilities are needed to accommodate the health needs of the existing population, whilst pressures are further exacerbated by forecast significant future population growth in the immediate locality and Borough wide.

The Trust supports the inclusion of NHS medical space in the proposals but this should be on the basis it is provided to the Trust at a peppercorn rent in perpetuity and we request the Council incorporate this principle in any S106 Agreement prepared for the planning application.

Officer comment: The issues raised are addressed in the context of the report.

9 Relevant Policies

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

National Planning Policy Framework (2021)

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
- 1
- 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

- G4 Open space
- G5 Urban greening
- H4 Delivering affordable housing
- H5 Threshold approach to applications

- H6 Affordable housing tenure
- H10 Housing size mix
- H12 Supported and specialised accommodation
- H13 Specialist older persons housing
- S4 Play and informal recreation
- E9 Retail, markets and hot food takeaways
- E11 Skills and opportunities for all
- G1 Green infrastructure
- G9 Geodiversity
- 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 area key excerpts from the Mayoral guidance on the provision of affordable housing:

- **Fast Track Route:** 'Applications that meet or exceed 35 per cent affordable housing provision without public subsidy, 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 35 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 35 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.

Romford is described in Table A1.1 of the London Plan as a Metropolitan town centre with high growth potential for commercial and residential land uses, it is also a strategic area for regeneration.

Local Plan (2021)

The following policies should inform design of the proposed development:

- 3 - Housing supply
- 4 - Affordable Housing

- 5 - Housing mix
- 6 – Specialist Housing
- 7 - Residential design and amenity
- 12 - Healthy communities
- 14 - Eating and drinking
- 16 - Social Infrastructure
- 17 – Education
- 18 – Open space, sports and recreation
- 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 the Development
- Standard of Design and Layout, Green Grid and Impact on Views
- Residential Amenity
- Housing Provision / Mix and Affordable Housing
- Provision of Community Facilities – Health Provision
- Traffic, Parking, Access, Servicing and Sustainable Transport
- Sustainability and Energy Efficiency
- Ecology and Biodiversity
- Flood Risk, Drainage and Urban Green Factor
- Environmental Issues
- Sustainable Waste Management
- Accessibility and Inclusivity
- Secure by Design
- Financial and Other Mitigation

10.2 **Principle of Development**

The application is for the delivery of 146 new residential (Class C3) dwellings in the detailed component of the application and up to 826 new residential (Class C3) dwellings (including 223 later living units Class C2) in the outline component. The principle of a residential led mixed use development on the application site has been established by virtue of planning permission reference P1389.17. Also, there is the adopted Site Allocations DPD. Both the wider London and Local Plans support residential development given that it is a brownfield site with excellent public transport accessibility and adjoins the Romford metropolitan town centre.

10.2.1 Policy 1 of the Local Plan provides a comprehensive overarching policy for the Romford Strategic Development Area, which this site forms part, for the delivery of over 5,300 new high quality homes in well managed residential and mixed use schemes that provide attractive places to live and which are well integrated with the existing community.

10.2.2 The National Planning Policy Framework 2021 states that housing applications should be considered in the context of the presumption in favour of sustainable development. The London Plan notes the pressing need for housing and the general requirement to improve housing choice, affordability and quality accommodation. The London Plan (Policy 3) also states that development should optimise housing output subject to local context and character.

10.2.3 On 14 January 2022 the Government published the 2021 Housing Delivery Test (HDT) results. The published results are, that within the London Borough of Havering, 46% of the number of homes required were delivered over the three year period of 2018-19 to 2020-21. However, the Local Plan was adopted in November 2021 which sets a stepped housing target such that the homes required over the same three year period is 700 per year, not the 1170 quoted. Applying the one month and four month "homes required lockdown reduction" for 19-20 and 20-21 respectively results in a total requirement of 1809 instead of the 3202 quoted. Against a delivery over the three years of 1474 would mean that Havering delivered 81% of the number of homes required. The proposal for 972 units would be equivalent to 139% of the annual target and the principle is therefore supported.

10.2.4 The proposal also includes 798 square metres of flexible floorspace (Use Class E, E(e) and F2). The proposal is sited on land formerly referred to as Romford Ice Rink, therefore Policy SSA7 on 'Romford Ice Rink' from LBH's '*Site Specific Allocations Development Plan Document*' 2008 becomes a material policy consideration. The policy, outlines that mixed use development comprising residential, leisure and retail facilities will be acceptable. As the proposal is for a residential-led mixed use scheme this aspect fulfils the above policy requirement and would be acceptable in principle, furthermore given its urban location supported by a PTAL score of up to 6a, the site is considered a sustainable location.

10.2.5 In light of the above policy considerations, officers are of the view that there are no in principle objections to a residential-led development coming forward on this site, the proposal seeks to increase housing supply in an area supported by sustainable transport patterns. The Environmental Information submitted in support of the

application does not suggest that there is a specific reason why the uses proposed would not be acceptable in principle on the site. Full consideration of the specific issues raised by the development are undertaken below.

10.3 **Standard of Design and Layout, Green Grid and Impact on Views**

Policy Context and Key Design Considerations

10.3.1 The NPPF states (paragraph 134) 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 133 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 GG1, which seeks the involvement of local communities and stakeholders in the planning of large developments..

10.3.2 Policy D3 of the London Plan encourage the optimisation of sites through a design-led approach, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the development design, as described in Policy D4 of the London Plan. This is echoed in Policy 26 of the Local Plan.

10.3.3 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. This is echoed in Policy 26 of the Local Plan.

The Design Response

10.3.4 As has been set out earlier in this report, phase 1 of these proposals is fully detailed at this stage, however phase 2 is not. Having said that, a design code, including parameters for buildings heights, for phase 2 has been submitted and will be conditioned in order that phase 2 is reflective of both the height, but also overall design quality, of phase 1. The outline application is submitted with all matters reserved for future determination; the detailed design, layout, access and elevational form of buildings is not before the Council. The application is however accompanied by a Design Code that seeks to explain the approach to design and layout:

Parameter Plans – These set design parameters in terms of site layout, maximum building heights and provision of open space.

Design Code – Sets out detailed design guidance for future phases on matters such as massing and scale, frontage, access, orientation, amenity, architectural character and materials.

Indicative Plans – Provide an indication of how the development could come forward.

Design and Access Statement – Provides a narrative as to the vision, objectives, design principles and key design elements of the scheme, including masterplanning and site layout, open space, character areas and landscaping.

Overall

- 10.3.5 On a site specific note, Policy SSA7 on 'Romford Ice Rink' from LBH's '*Site Specific Allocations Development Plan Document*' 2008 specifies that development on this site should in its scale and massing be consistent with the Queen's Hospital and Blades Court. In context, the Queen's Hospital extends to equivalent eight storeys set at a height of approximately 27m high at its tallest, adjacent buildings include Blade Court which is up to five residential storeys and former Oldchurch hospital site located to the north west is between six and ten storeys in height.
- 10.3.6 Policy D9 of the London Plan places great emphasis on the intention that tall buildings should be plan-led at the local level. It defines what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. The policy is clear that "Tall buildings shall only be developed in locations that are identified as suitable in Development Plans". Policy 1 of the Havering Local Plan identifies a tall building is generally anything which is of significantly greater height than its context and that tall buildings may be acceptable in the vicinity of the station subject to high quality design and strong public realm propositions at ground level. The proposal is for every building to be a tall building.
- 10.3.7 Supporting text to Policy D9 of the London Plan states that whilst high density does not need to imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as main centres of activity, and important street junctions and transport interchanges. Tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London's cityscape, and many tall buildings have become a valued part of London's identity. However, they can also have detrimental visual, functional and environmental impacts if in inappropriate locations and/or of poor-quality design.
- 10.3.8 The site sits within the Romford Strategic Development Area of the Local Plan, Policy 1. This states that tall buildings may be acceptable in the vicinity of the station. The justification for the policy states that the Romford Masterplan will be developed to identify locations for tall buildings. The Romford Masterplan is being prepared and is due to go through relevant consultation stages, with the aim to be adopted as a Supplementary Planning Document. Large areas of new development are likely to be forthcoming in the vicinity, including sites immediately adjacent. This site has the potential to form a key node in any future pedestrian movement from the station south towards Queen's Hospital, Homebase site, Seedbed Centre and Rom Valley Retail Park, The Brickyard, South Street and also towards Roneo Corner. Its importance

therefore necessitates an in-depth understanding and awareness of how the site sits in the wider context to ensure it can deliver a high quality proposal that contributes positively to Romford in the immediate and longer term. This should include as a minimum an analysis of the wider site connections that demonstrate the development in its current and potential future urban context. The site has been identified as appropriate for intensification and densification, addressing the housing shortfall in the borough, and delivering much needed additional capacity and amenity.

- 10.3.9 Given the above, whilst the proposals would be contrary to Policy D9 of the London Plan as the site is not currently designated as an area allocated for tall buildings, within the context of the emerging plan and the site's location near the station and Romford Town Centre, and also within the Romford Strategic Development Area, it is considered that there are reasonable grounds and justification for the proposal to depart from Policy D9 of the London Plan. This should also be seen in the light that the GLA have not objected to the proposal with regard to the tall buildings policy.

Overview

- 10.3.10 Option A has the largest quantum of new floorspace, however the figures have been amended with Option A now providing 83,508sq.m GIA for residential uses and 4,199sq.m GIA for non-residential uses, and up to 972 residential units. The site area is 3.17 hectares. Discounting 5% (the proportion of the total floorspace in non-residential use) the site area is 3.01 hectares equating to 322 units per hectare.
- 10.3.11 The proposal has undergone extensive Pre-App and Post-Submission discussion with Officers. The relatively high density of the proposal represents a significant change in the character of the area, and therefore led to a strong focus on heights and massing during these discussions. Negotiations have led to a fairly substantial reduction in density (since early stage of Pre-App meetings), to help the scheme to integrate more comfortably with the surrounding area thereby adopting a design-led approach to the scheme to establish an appropriate layout and massing, prioritising the delivery of new public realm and communal space and enhancing connectivity between the town centre and Queens Hospital and Oldchurch Park. The scheme is comprised of seven mixed use blocks arranged around a central spine road and a central park that will provide a space for the local community that is sheltered from the activity in the surrounding road network.
- 10.3.12 The masterplan is organised around a legible and permeable street grid, helping to improve pedestrian and cycle links in the wider area. The block structure helps to create well defined frontages to streets, and more private backs to residential courtyards.

Quality of public realm

- 10.3.13 The landscape strategy creates a central square and a series of residential courtyards. It maximises opportunities for planting to help achieve a relatively high Urban Greening Factor score.
- 10.3.14 Additional space given to Rom Valley Way creates the opportunity for pedestrian/cycle improvements and tree planting. This could improve the quality of the street, creating more favourable conditions for people without impacting traffic. It

would help accommodate the uplift in the number of people living and working in the area.

10.3.15 The submission includes an Environmental Statement that outlines the development would not have an adverse impact on the micro-climate, aviation and telecommunications. Achieving sufficient sunlight to public spaces is a challenge due to density of the proposal, but overall the height and massing have been negotiated to an acceptable level to achieve adequate sunlight to the majority of the site.

10.3.16 Ground floor land uses such as retail units, a gym and the NHS facilities help activate the public realm.

Scale, Massing and Design, quality of 'tall building' and Context Issues

10.3.17 The proposal aims to achieve a step down in scale from more central sites such as Waterloo Road and Bridge Close. Where 2 taller blocks (B and E) of 10 and 12 storeys are shown on the prominent corners of the site, extensive discussions were held to limit the width/bulk to achieve a more elegant silhouette. Elsewhere a maximum of 8 storeys to site boundary is generally shown, stepping down to 6 at the hospital edge. Some further blocks of 10 storeys are shown at the centre of the site where impacts on views and neighbouring sites are minimised.

Quality of residential accommodation

10.3.18 Through Pre-App discussions, the proportion of dual aspect units has been increased, and single aspect North West facing units minimised. This helps to achieve adequate daylight and natural ventilation to the majority of dwellings.

10.3.19 Courtyards are generally open on at least one side to allow good daylight levels to dwellings.

10.3.20 Adherence to key London Plan and LB Havering policies means that minimum space standards have been achieved and all dwellings have private amenity space. The objectives of adaptability and diversity are well addressed by the scheme. The proposed restaurant and retail units are adaptable with flexible ground floor design options. There would also be a flexible community use with residential units above. The development would deliver a wide range of residential unit types and sizes and the required space standards has been adopted in the scheme. The public spaces in the scheme have been designed so that they can be used for a variety of different activities, although specific areas are also set aside for play and recreation. This could be further improved as part of reserved matters to be submitted for approval.

Architectural expression

10.3.21 Elevations have been refined through the planning process to improve coherence and quality of detailing.

10.3.22 Provision of additional detail helps to demonstrate how a good quality finish to a modular construction scheme can be achieved.

10.3.23 A robust palette of materials is demonstrated, with well-considered brickwork based on a study of the existing materials in and around Romford.

- 10.3.24 With regards to the full application (Block A), the proposal seeks to incorporate four different types of facade materials, red brick for blocks to the west of the site and buff brick for blocks to the east of the site. Grey/Blue brick to be used for the plinth (ground floor); buff and red brick above the plinth (intermediate heights); solid red (lower heights); red (tallest height). There will be faceted and corner projecting balconies. Further, building typology will also vary across the site, through the use of expressive facades on the linear blocks and recessive facades on corner blocks, as well as projecting corner balconies across the site. The site is of a size and location where it can define its own character. The proposed material choices and finishes are considered to provide a high quality appearance contributing to the legibility and appearance of the site in accordance with stated above.
- 10.3.25 Overall, in terms of detailed architectural design, the proposals for Phase 1 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 building and the surrounding area. It should also be noted that these conditions are also to be included for the subsequent phases in order to ensure that the aspiration to achieve an appropriate standard of design across the whole site is maintained.
- 10.3.64 Finally, subject to the materials conditions outlined above the aspiration to provide a high quality development could be achieved and as such, the height and massing of the scheme would be acceptable.

10.4 **Residential Amenity**

- 10.4.1 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, adequate passive ventilation; that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to optimise the development of a site through a design-led approach.
- 10.4.2 Policy 7 of the Local Plan 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. In addition, development should be designed, orientated and positioned in such a way to minimise overlooking between dwellings.
- 10.4.3 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.

- 10.4.4 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. The SPD details specific space standards for communal areas, storage, bathroom spaces and corridor widths.
- 10.4.5 With regard to the detailed part of the application (Phase 1 consisting of Block A), the mixed tenure block comprise of approximately 70% dual aspect units with the remaining amount single aspect. However, only 8 (all one bed units) of the remaining ones are north-facing single aspect units out of a total of 146 units. Balconies and private terraces serve all units, while the core per floor ratio ranges from 4 to 8 units. All units comply with the London Plan and the National Technical Housing Standards in terms of overall size, storage, communal space and bathroom size.
- 10.4.6 Within the site the buildings and spaces respond to a grid leaving a minimum of 18 metres face-to-face distance, to ensure that appropriate privacy and outlook is provided. In key places, such as between Blocks D and G across the central park, the face-to-face distance is up to 50 metres
- 10.4.7 The Building Research Establishment (BRE) guidelines provide a test for measuring the average daylight factor (ADF) within habitable rooms to understand the amount of daylight afforded to these spaces. As a minimum, 1.5% ADF for living rooms is recommended. Phase 1 of the development proposes 146 units containing a total of 376 habitable rooms. A total of 91% of rooms (341 out of 376) would meet the minimum targets set by the BRE guidelines. Only 78% of combined living/dining/kitchen rooms, which are the primary living space, would meet this guideline however given the constraints and density of the proposal this matter in itself would not warrant refusal. Furthermore, the rooms below the standard are only marginally below.
- 10.4.8 Overall, given the density, design and layout of the perimeter and open courtyard blocks proposed, it is considered that the number of dual aspect units has been maximised and the number of north facing single aspects units minimised, which have also been provided with relatively shallow floorplans and staggered/projecting elevations, and as such on balance the quality of the residential units would be acceptable.
- 10.4.9 Whilst the majority of the scheme is presented in outline, and will be secured through Reserved Matters, the submitted Design & Access Statement has presented detailed residential layouts demonstrating the proposed quantum and unit mix can be secured. These confirm that approximately 69% of the residential units will be dual aspect in Option A compared to approximately 74% of the residential units in Option B. All units will have appropriate outlook and privacy.
- 10.4.10 With regards to the outline application, the site's primary constraint is the balance between the provision of private amenity, in the form of balconies, thermal comfort and daylight ingress. Overall, the outline blocks B, C, D, E, F and G would enjoy good

daylight from the outer façades, whilst lower daylight levels are seen on the façades facing the other blocks.

- 10.4.11 With regard to overshadowing, it is considered that, for the majority of amenity areas, and where practicable, the scheme has been designed to achieve acceptable conditions.
- 10.4.12 In respect of the impact of the proposals on the living conditions of neighbouring occupiers, the main consideration is the relationship with occupiers of the apartment buildings to the north and northwest of phase 2 - 5. Representations have been received from a small number of the occupiers of these apartments (Blade Court) and from the Century House / Payne Bros site with permission for 34 new units, principally regarding overlooking, overshadowing and visual impact/dominance resulting from buildings close to the site boundary with their properties.
- 10.4.13 The relationship between phase 2 to 5 of the development and the neighbouring site cannot, at this stage, be fully understood. This is because, whilst the parameters for phase 2 are set at this stage, all matters are reserved. This approach is usually used for a hybrid application as details on the outline elements are not available and therefore a full internal daylight and sunlight analysis cannot be carried out. Detailed information on the performance of the proposed accommodation of the outline elements will be provided later within the relevant Reserved Matters Application.
- 10.4.14 Nevertheless, the submitted daylight and sunlight assessments for both the detailed and outline components of the development conclude that the new residential units and the areas of public realm will receive good levels of light and comply with BRE guidelines. Officers are of the view that the impact on neighbouring properties will be acceptable. The outline aspect of the proposal are in the main, illustrative and subject to change.
- 10.4.15 It is considered that relationships with all other residential properties in the locality are likely to be acceptable.
- 10.4.16 Given the above with regard to the outline application, a condition is recommended restricting the maximum number of dwellings to be a maximum of 972 dwellings. The maximum number achievable may be less subject to detailed consideration of the reserved matters and requirement to achieve an acceptable mix of unit sizes and types, good standards of residential quality for future occupiers and acceptable amenity impacts to neighbouring properties. In conclusion, it is considered that the imposition of this condition would be an acceptable way to ensure future quality in the outline phases is secured.

Children's Play Space

- 10.4.17 London Plan Policy S4 requires development proposals that include housing to make provision for play and informal recreation, based on the expected child population of the scheme and an assessment of future needs and this is reinforced by Policy 18 of the Havering Local Plan. Where it is not possible to include such facilities within the development site, the Council will require the facilities to be provided nearby or an off-site financial contribution. The Mayor's SPG 'Providing for Children and Young

People's Play and Informal Recreation' contains more detailed guidance, including a benchmark of 10sqms of usable play space per child. The Council's Open Space, Sport and Recreation Study also identifies a need for 1 play area catering for under-11s and 1 for children between 12-16, to meet an existing shortfall in the local area.

10.4.18 The supporting DAS and Planning Statement sets out the type of play areas, the zone/area in which they would be located and the size of each play area and total areas for each type. These are set by the Parameter Plans and Design Codes to be provided within each of the development phases. The child yield for the proposal is approximately 365. The total play area provision would therefore amount to some 2,870sq.m (a shortfall of approximately 780sq.m), which is below in the standard set out in the Mayor's SPG and would therefore not meet the expected and future needs of the development. The applicant has stated that a proportion of 12+ play will be provided off-site at Grenfell Park or Oldchurch Park. All 0 to 11 year old play, and proportion of 12+ play, will be provided on-site.

10.4.19 Play space provision should normally be provided on-site, however off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distance, and in these circumstances contributions to off-site provision should be secured via legal agreement. Play space should be available to all housing tenures within immediately adjacent blocks and courtyards to promote social inclusion. This shortfall is expected to be mitigated through a financial contribution to improve off-site play space provision at any of the suggested parks to be determined at the reserved matters stage. The principle of mitigating the shortfall with an off-site contribution is considered acceptable, however the financial contribution for off-site provision will be calculated on an accurate assessment of designated play space within the proposal only.

Air Ambulance

10.5.20 The applicant has maintained contact throughout the application process with the National Air Ambulance who have raised no safety issues regarding the heights of the buildings as they do not breach the restricted flight zone. As a safe proof, a light beacon is proposed to be installed on top of one of the buildings to assist with navigation. This is included in the S106 Head of Terms.

10.5 **Housing Provision / Mix and Affordable Housing**

10.5.1 Policy H4 of the London Plan seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. 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

Appraisal

10.5.2 The hybrid proposal as a whole proposes on average 20% of affordable housing by unit numbers and 24% habitable rooms, with 59/41% (habroom) 69/31% (units) tenure mix in favour of intermediate for Option A. However, Option B has a slightly

higher percentage split of 44% social rent to 56% intermediate by habroom and 33% social rent to 67% intermediate by units. The outline scheme would have for Option A: 62 social rent units, 137 intermediate units and 773 private units (972 units) which represents 21% affordable housing by both unit and 24% habitable room, and for Option B: 62 social rent units, 127 intermediate units and 743 private units (932 units) which represents 20% affordable housing by both unit and 25% habitable room.

10.5.4 The applicant has advised that while Block A is the detailed application and to be delivered in Phase 1, Block F which forms parts of the outline application is to be delivered as part of Phase 1 alongside Block A. And that if development of Block F is delayed for any reason 48 affordable homes can be provided within Block A, of which 21% (7 units) would be social rented and 79% (41 units) would be intermediate by habitable room. The social rented units would all be 3 bed homes, where 29% of the units are 3B5P and 71% are 3B6P. By comparison, the unit mix for intermediate housing would be a mix of 1B2P (41%), 2B3P (12%) and 2B4P (46%).

10.5.5 The application is accompanied by a Financial Viability Appraisal (FVA) given it is following the 'Viability Tested Route' under the London Plan. Officers have reviewed the viability assessment submitted as part of this application and sought to run differences in the modelling supporting the viability statement to take account of higher sales values and likely future increases in values in the area. The viability scenarios have been reviewed by the Council's appointed viability consultants who have concluded that the amount on offer is the most that can viably be achieved at the present time. But this is only applicable to development option without the Later Living accommodation (Class C2) as proposed in Block G. The initial conclusion of independent review of the submitted FVA states that *"the Market for Sale proposals both produce a marginal surplus. Our sensitivity analysis shows that relatively small shifts in costs or revenues will erode this surplus. However, the Later Living scenarios produce a higher surplus of up to £42.5m, and these scenarios do not revert to a deficit even with 5.00% changes in both costs and revenues.*

If a higher BLV were to be assumed, in line with the 2018 consent which was extant until relatively recently, the Market for Sale scenarios return a deficit indicating they are unable to provide further Affordable Housing, however the Later Living (LL) scenarios produce a surplus, indicating that additional Affordable Housing could be provided."

10.5.6 Following the above review, the applicant submitted an addendum in response and concluded that the main outstanding point between the parties to be determination of the BLV (Benchmark Land Value), specifically the agreement of an appropriate AUV (Alternative Use Value) scheme. Whilst the submitted FVA indicates a deficit for all development options including that of Later Living, the addendum report by the independent assessor concludes a surplus for Option A (£39.5m) and B (£38.68m) with Later Living Accommodation as opposed to mainly MFS (Market for Sale accommodation) (Class C3) . Its conclusion reads:

"We have provided sensitivity analysis in Appendix 1, which shows that for the MFS scenarios small changes (less than 2.50%) in costs or revenues result in the scheme returning a surplus. For the LL scenarios, even

combined changes of up to 5.00% in income and revenue do not result in a deficit position.”

10.5.7 Officers consider the surplus amount to be significant, and as such would expect to see an increase in the level of affordable housing provision should the Later Living option be implemented. This figure is disputed by the applicant. The amount of comparison data for Later Living is limited and at this stage it may be difficult to reach agreement with the applicant on this matter. As there is no policy requirement to provide Later Living, as a way forward, further consultation was held with the GLA viability team who advised that GLA are prepared to accept, on a without prejudice basis, the proposal of 24% affordable housing by habitable room as the base line on the condition that the s106 agreement includes mid stage reviews and suggested the following:

- . **Early stage review:** A full assessment of viability prior to implementation if implementation is not undertaken within 24 months of planning permission (alternatively it would be acceptable to use the GLA's formulas for this review as well);
- . **Mid stage reviews:** Additional reviews based on value and cost changes from the initial assessment based upon Option A (MFS) using the GLA formulas and triggered at completion of c300 and c600 residential units (exact timing to be discussed to work with Later Living Review and to facilitate on site delivery of affordable housing)
- . **Later Living Review** - Prior to the commencement of Block G if the Later Living option is triggered for Block G
- . **Late stage review**) [874 units] unit of development – this reflects 90% of private units.
 - o 100% of any surplus on review would go to the LPA with the exception of the Late Stage review where this would be split 60:40 in favour of the LPA.
 - o Additional contribution determined to be provided in the first instance as on site affordable housing (Additional Affordable Housing Plan to be maintained at all times to protect on site delivery)
 - o Late-stage contribution to be paid as a cash sum.
 - o If a review is triggered, these values/costs become the base for proceeding reviews.

10.5.8 However, officers are of the view that should the delivery of the scheme be tied to a phasing plan and Phases 1 and 2 take the scheme over 300 units, the first mid stage review will be at 75% occupation of Phase 2 and then the second mid stage review at a point in a subsequent phase when 600 units is expected to be completed. The LL review is on commencement of that block and so in theory will come before the first mid stage review but any additional value increase will be picked up in the first mid stage review. This is an additional review so there might end up being two reviews close together which could happen if there is no phasing plan and the LL is delivered at a different point.

10.5.9 The level of affordable housing proposed is somewhat short of policy aspirations, nevertheless it is considered that the Council has insufficient grounds to come to an

alternate conclusion on viability. In addition, the Council has been able to secure mainly family units for the affordable social rent provision in response to the identified housing need for the borough. As such, it is considered that the proposal has sought to provide the maximum possible amount of affordable housing subject to appropriate review mechanism.

- 10.5.10 Given the size and timescales of the development in delivering up to 972 residential units over 5 phases, an early, mid and late stage review mechanism will be required to be secured via the legal agreement in line with the London Mayor's Affordable Housing and Viability SPG. Additionally, the phasing of the affordable housing delivery by tenure will also be secured via the s106 legal agreement.

Specialist Housing

- 10.5.11 The provision of 23,221sqms of elderly persons housing is supported should that option be taken up, in line with the aims of London Plan policy H13. The proposed location of this accommodation within Block G would be convenient for local amenities and would therefore be acceptable.
- 10.5.12 It is therefore considered that the range and mix of housing proposed would address the objectives in terms of housing delivery, as well as promoting mixed and balanced communities in accordance with NPPF, London Plan and Local Plan requirements. The proposed delivery of 20% affordable housing, with a significant proportion of large family dwellings, is accepted to be the maximum that can be achieved having regard to current development viability and the requirements for the delivery of other infrastructure from the development value created on the site. A review mechanism is nevertheless proposed to ensure that opportunities to increase the provision of affordable housing to meet planning policy aspirations can be realised, where-ever possible

Conclusion

- 10.5.11 For the reasons outlined above and subject to the relevant legal obligation set out, it is considered that the development accords with key policy objectives in relation to affordable housing provision.

Unit Mix

- 10.5.4 The NPPF (2021) 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.
- 10.5.5 Policy 5 of Havering Local Plan 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; that where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard the mix of units to be

provided within developments and the housing mix as set out in table below does not apply to such proposals:

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

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

Option A - MFS in G; full F

Unit Type	Private Units	Intermediate Units	Social Rent Units	Total Units
1bed 2person	380	57	0	437 (45%)
2bed 3 person	146	13	6	165 (17%)
2bed 4 person	194	55	13	262 (27%)
3bed 4 person	2	0	4	6 (1%)
3bed 5 person	46	12	11	69 (7%)
3bed 6 person	5	0	12	17 (2%)
3bed 6 person Duplex	0	0	16	16(2%)
Total	773	137	62	972 (100%)

Option B - MFS in G; partial

Unit Type	Private Units	Intermediate Units	Social Rent Units	Total Units
1bed 2person	325	50	0	375 (40%)
2bed 3 person	148	24	0	173 (19%)
2bed 4 person	224	19	12	255 (27%)
3bed 4 person	2	9	3	14 (2%)
3bed 5 person	33	24	13	70 (8%)
3bed 6 person	11	0	26	37 (4%)
3bed 6 person Duplex	0	0	8	8 (1%)
Total	743	127	62	932 (100%)

10.5.6 London Plan H10 A6 states that “3.4 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.” While majority of the units proposed are one and two bed, the proposal should be considered in the context of its location and the submitted Housing Delivery Viability Statement.

10.5.7 However, the applicant has engaged the Council Housing Team in establishing and agreeing the preferred unit mix in order to maximise the level of family units from the site, in line with prevailing policies. This is important, as this site is one of the only strategic sites Romford Strategic Area that has the potential to deliver a significant

proportion of larger housing, particularly affordable housing, which is has been discussed in more detail above. On this basis, there is no objection to the tenure mix as currently proposed.

10.6. **Provision of Community Facilities – Health Provision**

10.6.1 Paragraph 20 of the NPPF states that strategic policies should set out an overall strategy for the pattern, scale and quality of places, and make sufficient provision for:

- community facilities (such as health, education and cultural infrastructure)

10.6.2 Policy S2 of the London Plan states that boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to identify and address local health and social care needs within Development Plans, taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies.

10.6.3 Policies 12 (Healthy Communities) and 16 (Social Infrastructure) of the Local Plan require that any health impact of development be addressed and that new social infrastructure be provided on major development sites where identified in the Infrastructure Delivery Plan (IDP).

10.6.3 Having both options (A / B) for the development of the site include the provision of a building of circa 2,700sq.m to 2,900sq.ms floorspace to be used for hospital purposes. This is shown as being part of Block F (outline application), south of the hospital access road, close to the crossing point to the main entrance of the hospital. Responses from the Barking, Havering and Redbridge University NHS Trust (the Trust), NHS Healthy Urban Development Unit (HUDU) and Clinical Commissioning Group (CCG) with regard to the application all set out the need to provide additional facilities for Queen’s Hospital, given the increased demands on the hospital since it was built. The application site, given its proximity to the hospital, provides the optimum opportunity to provide additional facilities. The current IDP (2018) does not identify a need for new hospital accommodation, although a new draft IDP is expected later this year where the needs expressed by the NHS will be taken into account.

10.6.4 There would be health demand from the proposed development, but not to the extent that a standalone facility serving the development is required. Health facilities sufficient to deal with growth in the Romford area are planned elsewhere in the Strategic Development Area, for example Bridge Close. However, some demand on the hospital would result from this proposal and this site provides the best opportunity to provide an additional hospital building that the NHS state that they need.

10.6.5 In terms of the delivery of the hospital building, comments received from HUDU, CCG and, initially, the Trust requested that the building be provided at peppercorn rent. The applicant has responded that the cost of providing a building at nil cost would severely affect the viability of the proposal and result in no affordable housing being provided, however, the applicant is willing to cooperate in seeking the best options for the Trust including longer leases, security of tenure and standard of delivery (agreed specification) to suit the Trusts requirements and bring associated costs to a

minimum. As a result of this, the Trust has accepted that there does need to be a commercial agreement with the applicant and is working on reaching agreement with them.

10.6.6 At the moment, the Trust do not have a business case in place for the additional accommodation, do not have approval or funding from the NHS and do not have a confirmed use of the building and consequently the details of the final building, services required, specification and finishes are not set. The Trust have commented that they would be seeking soon to enter into an agreement with the applicant and appoint solicitors for this purpose with an aim that strategic outline and outline business cases be agreed by the NHS later in the year. The applicant has agreed to include in any S106, clauses to require that the applicant cooperate with the Trust in relation to the business cases, enter into an agreement for lease should the business case be agreed (with set ranges for length of term and rent), to align the reserved matters to the lease agreed, to limit the use of the building to a health facility for the hospital unless no lease is agreed after the later of 6 years from the date outline planning permission is granted or 5 years from the approval of reserved matters. It is considered that with these clauses in place, there is a reasonable prospect that the health facility, improving health provision for the Borough and beyond, will be achievable unless the NHS decide that the facility is not needed. Therefore, it is considered that in relation to any overall balancing exercise in relation to the merits of the development as a whole the prospect of the development providing social infrastructure benefits on-site can be afforded a fair degree of weight in favour of the proposal.

10.7 **Traffic, Parking, Access, Servicing and Sustainable Transport**

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. Local Plan policies 23 and 24 seek support development which ensures safe and efficient use of the highway and demonstrates that adverse impacts on the transport network are avoided or, where necessary, mitigated and reinforce 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..

10.7.2 The application is accompanied by a Transport Assessment (TA) dated March 2021 by mayer brown (Impact Development Romford 1 Ltd). The Council and TfL have also undertaken traffic modelling as part of a wider exploration of traffic generation and its potential mitigation, associated with the development. The TA has been fully considered by the Highway Officer and who has not raised any fundamental objections to the proposal. Whilst the proposal would result in a significant number of

residential units at this site, having carried out an assessment, broadly speaking, the residential use of this site would be likely to result in reduced journeys to and from this site, particularly at peak hours, compared to the previous use of the site as ice rink and taking into account the number of parking spaces proposed in the approved 2018 mixed use development. Depending on the options implemented, a total 91 (including 31 disabled spaces and two car club spaces) or 156 (including 45 disabled spaces and two car club spaces) parking spaces is proposed. The accompanying Transport Assessment (TA) concludes that the Development is unlikely to have any material impact on the level of personal injury accidents in the area. As detailed in the accompanying TA, electric car charging points will also be provided in accordance with policy requirements. This will be secured by appropriate condition.

Residents' Parking

Total Option A	Total Option B
967 Units	927 Units
56 Standard Parking Spaces	113 Standard Parking Spaces
31 Blue Badge Spaces	45 Blue Badge Spaces
91 Total Parking Spaces	156 Total Parking Spaces
10% Ratio	16.8% Ratio

- 10.7.3 Vehicular access to the Site, including for refuse and delivery, is provided via Rom Valley Way. However, two indicative internal road access linking Oldchurch Road via the public carpark west of the site are proposed in the outline application. Option A is a new northern site access. This option will deliver the maximum number of residential units while Option B, which will use the existing site access will result in a 5% reduction.
- 10.7.4 The overall car parking ratio is 0.1 car parking spaces per residential unit (972). The number of disabled parking spaces proposed represents on average 3% of the overall residential units. The detailed part of the scheme (Phase 1) would comprise 14 car spaces (6 standard, 4 blue badge and 4 car club) at ratio of 0.1 car spaces per unit, with the remaining outline part of the scheme (Phases 2-5) capped at a maximum of 0.1 spaces per unit. The PTAL of the site ranges between 2 and 6a, however this varies across the site with the predominant part of the site in PTAL 2-3. London Plan policy would seek car free developments for sites within PTAL 5-6, whilst sites with a PTAL of 2-3 in Outer London would trigger a maximum car parking standard of 0.75 car spaces:
- 10.7.5 The scheme will provide approximately 1,738 cycle spaces across the site, including 1,636 internal cycle spots for residents and 102 Sheffield stands but it appears the breakdown has not been given on this by land use or as a comparison with the previous Long Stay and Short Stay levels. The Planning Statement revision states only that the 1738 spaces will be internal, and thus they are presumably long stay only. TfL has advised that in the absence of clarification/breakdown with more detailed revised cycle parking plans, for the detailed part of the proposals TfL cannot confirm whether or not the proposals meet at least the minimum required by both parts of Policy T5 i.e. quantum and compliance with LCDS; stating that the information provided is insufficient to judge whether the space provided will accommodate the requisite number of plans according to TfL's London Cycle Design

Standards. On this basis TfL advises that the delivery of the site and the infrastructure and bikes needed for the scheme should be clarified and that to be provided by this developer should be secured through condition or s106. Management, charging and hire arrangements are also needed. The submitted drawings should indicate the location of the relevant area, even if details are to be confirmed subsequently. Notwithstanding, officer are of the view that adequate cycle parking will be provided for the development in line with relevant policies and their provision secured by conditions. No explicit provision is dictated for motorcycles or scooters but the proposed parking strategy requirements are expected to make such provision and are required by condition.

Internal Roadways/Pedestrian/Cycling/Green Link Provisions

- 10.7.6 The Parameter Plans highlight a central road layout of the site consisting of primary routes which serve to connect the internal road network to all points of access/egress such as Oldchurch Road and Rom Valley Way. These primary routes are supported by a secondary route network which acts as an arterial link from the primary routes to the minor access road layouts hence serving to create suitable connectivity to the various areas of destination within the site.
- 10.7.7 Detailed designs for the road layouts and how they interact with the Green Link provisions (a part of the Council's Liveable Neighbourhoods improvement to cover Rom Valley Way), servicing/delivery/emergency service and school drop off aspects, together with pedestrian and cycle facilities thorough the site will be subject to future reserved matter applications as they come forward as part of the phased regime of the project.
- 10.7.8 It will be expected that the roadway will be substantively traffic calmed in a fashion to achieve the desired aim of affording sustainable travel modes such as walking and cycling a clear priority over the motor vehicle. Although a primary route, there is no potential for the internal road for rat-running given the no through nature of this area however similar 'non-friendly to the private car' treatments in terms of road design/pedestrian linkages in accord with Government best practice and guidance relevant at the time will also be required as part of any reserved matters submission.

Public Transport

- 10.7.9 The wider area is also served by a range of bus routes. Bus services on routes 5 (Romford to Canning Town), 193 (Queens Hospital to Harold Wood) and 496 (Queens Hospital to Harold Wood) operate from the stop (Stop HN) located between the Site and Queens Hospital. The bus stop is approximately 2-minute' walk from the Site. Additionally, a number of bus serving routes (128,175, 365, 498 and 499) operate from the adjoining bus stops (Stops HM, HK and HL), providing service to the wider area, such as Chase Cross and Brentwood. It is accepted that the application site as it stands generates few demands on these local services. The redevelopment with its multi-faceted use types are predicted to significantly increase demand as would be expected given the significant population of the site coupled with the promotion of sustainable travel modes in lieu of the private motor vehicle. The inherent 'designed in' pedestrian permeability throughout the site would further promote this improvement in accessibility to bus services and hence increase demand.

- 10.7.10 In order to cater for this anticipated burden on local services the Council, in tandem with Transport for London, will require contributions towards the service's enhancement via legal agreement:
- A sum £200,000 sought to upgrade nearby bus stops (for the bus/hospital access) in line with TfL's "Accessible Bus Stop Design guidelines". This will encourage usage by improving the quality and ease of bus stop use and physically assist bus operators with service provision
- 10.7.11 Council's Highway Officer has also recommended a condition for a restricted CPZ to be introduced to the area and legal obligations placing restrictions on parking permits. The Local Highway Authority has raised no objection subject to the applicant entering into a Legal Agreement to secure these sums. Subject to the completion of this agreement and the attached planning conditions, the proposal would be acceptable in highway terms and it is not considered that the proposed development would result in parking or highway safety issues. The legal agreement would also be consistent with the other residential developments within this area.

Conclusion

- 10.7.12 Overall, the transport assessment, wider area traffic modelling undertaken for the SAA and the site specific and transport design outcomes associated with the development comprise a significant, long term investment in transport infrastructure, both on and off site. The impacts of the development have been modelled and found to be acceptable, subject to specific mitigation measures and associated modal shift incentives. In implementing the package of works required to manage the impacts of the development on the surrounding network, including pedestrians and cyclists; and surrounding residents, the Council will expect to engage in both further design and consultation with the new and existing community of interests. Officers nevertheless consider that the proposals contained within the application, subject to appropriate controls, can be accommodated on the site and having regard to the findings of the transport assessment and environmental statement need not give rise to significant adverse environmental effects that would warrant rejection of the proposals outright.
- 10.7.13 It is therefore considered that the proposals satisfy relevant national, London and Local Plan policies. The acceptability of final design layouts will be subject to future detailed reserved matters submissions for each phase to ensure conformity with the outline application and Local Plan/SAA objectives.

10.8 **Sustainability and Energy Efficiency**

- 10.8.1 Paragraphs 155 - 158 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*

- 10.8.2 The applicant has submitted an Energy Statement, which details the likely energy demands of the proposed development and proposed energy supply measures. A Sustainability Statement has also been submitted, which appraises policy and reviews project specific targets in relation to matters such as energy, water, resource conservation, waste management, biodiversity and pollution control.
- 10.8.3 The applicant has submitted a Sustainability and Energy Report. The energy report sets out that a 36% reductions in regulated CO2 emission in the case of the detailed application, 37.9% with regards to the outline application is predicted to be achieved onsite across domestic and no-domestic uses.
- 10.8.4 The Energy Strategy sets out the following approaches to be taken to achieve the London Plan CO2 target reduction:

“Be Lean” – The applicant is committed to reducing energy demand and CO2 emissions related to the development. The following measures are proposed to that effect:

- All dwellings will incorporate enhanced insulation in the building envelope (walls, roofs, floors and glazing) to achieve U-values
- Mechanical ventilation with high efficiency heat recovery
- Natural ventilation and openable windows where possible
- Thermal Bridging
- No cooling proposed to the residential scheme.
- Space Heating and Hot Water - All blocks will connect to the proposed Rom Valley heat network
- Assumed that the non-domestic uses may install cooling as part of the tenant fit-out.
- Low energy lighting with occupancy sensing and daylight dimming controls.
- Limiting the Risk of Summer Overheating – use of solar control glazing (low g-value) to reduce uncomfortable solar heat gains across all blocks.

“Be Clean” – installation of gas powered community heating and hot water. Be clean would typically be associated with Combined Heat and Power (CHP). It is proposed to incorporate a gas community CHP system powering the residential units, the retail and community hall.

- A single, communal energy centre with centralised heating plant and thermal storage will supply heat to all uses across the Development. The Energy Centre will be designed to enable connection into a wider area heat network within Romford should one become available at a later date

- Proposed strategy is Air Source Heat Pump (ASHP) led and therefore falls under the 'Be Green' step.
- The alternative strategy is currently a concept and still in its infancy.

Be Green” – An appraisal of available renewable energy solutions has been carried out, which has identified the following technologies as the most appropriate for the Development.

- ASHPs
- Solar PV Panels – The site will provide significant installations of PV panels to the most appropriate areas. These total as follows:
 - > Detailed Application area – 14kWp (generating approximately 10,600 kWh/yr);
 - > Outline Application area (estimated) – 179kWp (generating approximately 135,800 kWh/yr).

10.8.5 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 36% for phase 1 and 37.9% for phase 2. In terms of carbon offset, it is estimate that 93.9 tonnes of residential CO2 and 8.1 tonnes of non-domestic CO2, 508.5 tonnes of residential CO2 and 35.1 tonnes of non-domestic CO2 emissions would need to be offset through of site contributions for the detailed application and outline application respectively. This is estimated at £1,162,080 (£183,600 phase 1 and £978,480 phase 2). As the application is hybrid, 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.

10.9 Ecology and Biodiversity

10.8.1 The application is accompanied by an Environmental Statement (ES), which includes consideration of the ecological and biodiversity interests on the site. Havering 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.

10.8.2 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 including green roofs and green walls 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.

10.8.3 Ecology consultant is satisfied that the surveys carried out in relation to protected species such as bats are adequate and there is sufficient ecological information available for determination of this application.. In the case of an approval, conditions would be recommended in relation to habitat creation and enhancement, as well as

in relation to the mitigation of possible impacts from construction activity, as recommended by the ES.

10.9 **Flood Risk, Drainage and Urban Green Factor**

10.9.1 Guidance under the NPPF seeks to safely manage residual risk including by emergency planning and give priority to the use of sustainable drainage systems. London Plan Policy SI12 states that Development proposals should ensure that flood risk is minimised and mitigated while Policy SI13 outlines that Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. And Local Plan Policy 32 will support development that seeks to avoid flood risk to people and property and manages residual risk by applying the Sequential Test and, if necessary, the Exception Test as set out in the NPPF.

10.9.2 The application site is located within Flood Zone 1 in an area benefitting from flood defences and generally has a low and very low risk of surface water flooding. The proposed surface water strategy for the Site has been developed to utilise sustainable drainage techniques (SUDs) to attenuate surface water at source and reduce the risk of downstream flooding as far as possible. To mitigate the risk of flooding from surface water and anticipated effects of climate change, the Development will incorporate SUDs to manage storm water and reduce pre-development discharge rates.

10.9.3 Sustainable urban drainage systems have been incorporated into the proposal in the form of three buried attenuation systems with a total volume of 1130m³, in addition to soft landscaping and green/brown roofs and podium level which would serve landscaped courtyards with soft landscaping and planting. The above ground SUDS measures would provide biodiversity benefits and in combination with the below ground storage tanks, help to provide a 50% reduction on the surface run-off for the existing site. Overall, it is considered that the proposed SUDS measures are satisfactory and these are to be secured via condition. The Environment Agency has advised that the construction and mitigation measures contained in the submitted Flood Risk Assessment. As such, it is considered that the proposal would not increase flood risk and therefore accords with policies of the London Plan, SI12 and SI13 of the London Plan and standard 37 of the Housing SPG.

10.9.4 Policy G5 of the London Plan sets an Urban Greening Factor (UGF) target score of 0.4 for residential and 0.3 for commercial. The proposal provides a UGF of 0.4897 exceeding the both of these targets. This would be achieved through a range of urban greening measures, including public realm landscaping, trees, natural vegetation and tree planting along the boundary with the railway, a rain garden and flower planting in pocket parks and podium courtyard spaces. Finally, should outline planning permission be granted a condition would be imposed seeking UGF assessment for phases 2-5 of the proposals.

10.10 **Environmental Issues**

Land Contamination

10.10.1 The Council's Environmental Health Officer has raised no objections in relation to any historical contaminated land issues, air pollution or noise. The Environment Agency

has also been consulted and has confirmed that there are no objections to the proposals by way of environmental matters.

- 10.10.2 A Contaminated Land study was undertaken with details submitted under the application. These were reviewed by the Council's Environmental Health officer who recommended conditions seeking a remediation strategy and verification report. It should also be noted that the site is brownfield land and have had the benefits residential use permission as recently as 2018. Therefore some remediation and contamination works would be required to secure the site for future use. These will be secured via conditions.

Air Quality

- 10.10.3 The proposed development is located within an area of poor air quality which suffers from high concentrations of nitrogen dioxide. Therefore it has been designated as an Air Quality Management Area (AQMA). To safeguard against additional unnecessary impacts to air quality, conditions are recommended to mitigate future impacts during the construction and operational phases of the development, including details to protect the internal air quality of the buildings as well as a requirement for ultra-low carbon dioxide boilers.

Noise

- 10.10.4 The Environmental Health Noise officer has reviewed the Noise report submitted which states that given the location of the site there is unlikely to be significant noise generated that may represent greater harm to neighbouring residents. Therefore subject to conditions governing future machinery use the proposed development would be acceptable on noise grounds. These conditions would be imposed should planning permission be granted.

Archaeology

- 10.10.5 The accompanying Heritage Statement considers both above ground and below ground (archaeology) heritage. Historic England has advised that the site is divided between areas of very low archaeological potential and higher potential that avoided quarrying. The development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. It therefore recommended the imposition of a two stage archaeological pre-commencement condition as a safeguard measure.

10.11 **Sustainable Waste Management**

- 10.11.1 London Plan Policy SI7 seeks to minimise waste and encourage the reuse of and reduction in the use of materials. The Mayor seeks to ensure that there is zero biodegradable or recyclable waste to landfill by 2026 and meet or exceed the municipal waste recycling target of 65 per cent by 2030; and achieving a minimum of 95% reuse/recycling/recovery rate for construction and demolition waste. Policy 35 requires all major development proposals must be accompanied by a Waste Management Plan which demonstrates how the criteria set out below will be achieved:

- i. Provide adequate internal storage space within their premises to enable the occupiers to separate, store and recycle their waste;
- ii. Provide adequate, secure, external or communal storage facilities on site which allow for the separate storage and collection of waste, reusable items, recyclable materials and compostable waste;
- iii. Include on-site waste management, which minimises the need for waste transfer, where it is feasible to do so;
- iv. Allow for convenient and safe access to manage waste, including for older persons or persons with disabilities;
- v. Allow for convenient and safe access for waste collection services;
- vi. Implements high quality design solutions to minimise the adverse visual impact of waste facilities onsite;
- vii. Enable waste from mixed-use schemes to be segregated in separate secured areas; and
- viii. Provide innovative solutions to reduce waste at source.

10.11.2 The application submission is accompanied by a Delivery and Servicing Management Plan (DSMP). The DSMP details that that all deliveries and servicing will be undertaken within the Site, as will refuse collection including the use of an underground refuse system (URS) and potential use of waste compactors in later phases.

10.11.3 The Council's Street Management in charge of waste management have reviewed the proposed waste strategy for both the residential and commercial aspects of the development, the collection of bins and storage facilities which are to be provided in communal stores and secure storage stores located across the ground floor of the site and use of URS, as shown in the Design and Access Statement and consider it to be satisfactory subject to imposition of relevant conditions in the case of an approval.

10.11.4 Overall, it is considered that the proposed development will provides a suitable waste strategy that meets the requirements of the London and Local Plans.

10.12 **Accessibility and Inclusivity**

10.12.1 Policy D5 of the London Plan requires that all new development achieves the highest standards of accessibility and inclusive design, whilst Policy DC7 of the Havering Development Control Policies seeks 10% of all new homes to be wheelchair accessible.

10.12.2 Further, Policy D7 of the London Plan seeks all new homes to meet the Building Regulations M4(2) standard for 'Accessible and adaptable dwellings' and 10% of the dwellings shall be designed to meet the M4(3) standard for 'Wheelchair user dwellings

10.12.3 With regards to the detailed application, details submitted with the application demonstrate that the development could meet the above requirements. As per the outline application, full details of site levels and designs of individual buildings are not before the Council for consideration at this stage. However, the details of site levels that are shown on the Parameter Plans demonstrate that an accessible public realm should be able to be created and a condition is therefore recommended to ensure that

an accessibility scheme is provided with each reserved matter application. It is also recommended that a condition is imposed to ensure that all dwellings comply with Policy D7 of The London Plan on Accessible housing with 10% of dwellings meeting Part M4(3) 'wheelchair users dwellings' compliance. Applicable conditions would be imposed in the case of an approval.

10.13 **Secure by Design**

- 10.13.1 Policy D11 of the London Plan states that Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. 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 Plan 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.
- 10.3.2 In terms of the outline aspect of the, detailed drawings (illustrative plans submitted) of building design and layout are not before the Council for consideration at this stage. However, it is necessary to consider the extent to which the submitted Parameter Plans and Design Code deal with secured by design issues.
- 10.13.3 The majority of the site would be developed in a simple block structure, which is typical of the area. The Design Code include stipulations that buildings with active frontages should surround the principal public spaces in the development and the illustrative masterplan indicates that an acceptable residential layout can be provided in terms of natural surveillance of streets, spaces and parking courtyards. Further consideration will normally be given to this issue at reserved matters stage
- 10.13.4 In keeping with these policies officers have consulted the Metropolitan Police's Designing Out Crime team to review the submitted application. They have commented that the application is acceptable subject to conditions stipulating that prior to the commencement of development the applicant shall be required to make a full and detailed application for the Secured by Design award scheme and thereafter adhere to the agreed details following approval.
- 10.13.5 A request for detailed information relating to Secured by Design measures is to be secured by condition in the case of an approval, including measures to ensure that the public open spaces, including they are adequately lit and further consideration of the layout of these spaces will be undertaken on consideration of any reserved matters applications. It is therefore considered that an acceptable arrangement would likely to be provided throughout the scheme.

11 **Financial and Other Mitigation**

- 11.1 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 DF1 of The London Plan 2021 and policy 16 of the Havering Local Plan 2021.
- 11.2 The proposal would attract the following Community Infrastructure Levy contributions to mitigate the impact of the development:
- 11.3 The Mayor's Community Infrastructure Levy (MCIL1) was introduced in 2012 to help finance Crossrail and on 1 April 2019 the new, replacement charging schedule (MCIL2) came into effect in order to fund Crossrail 1 (the Elizabeth Line) and Crossrail 2. If approved, the proposed development would be subject to (CIL) applied at a rate of £25 per square metre of additional gross floor area.
- 11.4 The London Borough of Havering's CIL was adopted in September 2019. Open market residential development will attract a levy of £125 per sqm of net additional floor space. If approved, the proposed development would be subject to (CIL) applied at a rate of £125 per square metre of additional gross floor area.
- 11.5 The applicant has provided a breakdown of the proposed buildings as follows **97,697m²**:

Planning obligation	Option A MFS	Option B MFS	Option A LL	Option B LL
Mayoral CIL	£1,658,800	£1,688,675	£1,658,800	£1,658,800
Borough CIL	£8,920,750	£8,959,625	£8,920,750	£8,920,750

- 11.6 A provisional liability notice will be issued on this basis, with detailed payment arrangements to be agreed.

Equalities

- 12.1 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
- 12.2 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.

- 12.3 Policy CG1 of the London Plan also seeks to support and promote the creation of an inclusive city to address inequality.
- 12.4 Therefore in recommending the application for approval, officers have had regard to the requirements of the aforementioned section and Act and have concluded that a decision to grant planning permission for this proposed development would comply with the Council's statutory duty under this important legislation.
- 12.5 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.

13 **Conclusions**

- 13.1 This comprehensive proposal has been developed through pre-application and public engagement exercises over the last 24 months. The proposals comprise a mix of "conforming" land uses, which are being used to "enable" the creation of brand new, healthcare (NHS facilities) floor space and provide a net increase in employment opportunities on the site. This principle of enabling development is a recognised within the Local Plan as being legitimate in appropriate circumstances. The proposals, alongside the mitigation measures and controls are, overall, considered to result in the delivery of positive, long term benefits for the Borough that are consistent with the sites location within the Heart of Havering, Area for strategic development
- 13.2 The application material, including the Environmental Information contained within the Environmental Statement, traffic assessment and Retail assessment demonstrate that the quantum, type, scale, density and mix of uses can be achieved, subject to suitable controls (including off site infrastructure provide through S106 agreement) without significantly harming environmental, amenity and economic conditions in the borough
- 13.3 Officers have engaged with and considered carefully the representations from those likely to be affected by the proposals and, in partnership with the applicants, have sought to identify ways of addressing or mitigating such impacts to an acceptable level. Concerns surrounding transport impacts on the surrounding road network in particular, are proposed to be addressed by a comprehensive funding package that will enable a suite of measures.
- 13.4 Complementary health, neighbourhood uses and education contribution as part of applicable CIL payment, are also proposed to mitigate the demands placed on existing health, community and education infrastructure that would be affected by the development. The proposed space for a new medical/healthcare floorspace meanwhile, would make a wider strategic contribution to the NHS needs on the future, across the borough.
- 13.5 The proposals would deliver high quality, architecture and landscape design that would be complementary to the context of the site but would serve to lift the appearance of the wider area on this side of the Rom Valley Way. The re-use of the site would deliver energy and activity to a large part of the town and would deliver significant improvements to the local environment. Integration between the site and the town as

a whole would be enhanced through improvements to connectivity to the town centre and railway station, Rom Valley Way Road and more widely with the proposed highway improvement scheme. The proposal would deliver up to 972 new homes (a total of 146 of these units would be brought forward as part of Phase 1) of the development on a brownfield site, in a mixed use development including community facilities such as shops, cafes, bars and a neighbourhood centre and opportunities for informal play.

- 13.6 Whilst proposed scheme is disappointing in terms of the amount of affordable housing that is guaranteed at this stage and, in this sense, the proposals do fall short of the aspirations of the Council. However, the many benefits of the scheme that have been set out in this report are considered too clearly outweigh the negative elements that have been identified.
- 13.7 Whilst some elements of the proposals are not, in isolation, supported by the policy framework, having regard to the significant, economic and regeneration benefits derived through the development, the potential environmental and physical effects of the development (and their scope for mitigation) and the provisions of the NPPF and the adopted and Local Plan, the proposals are nevertheless considered to represent a viable, and on balance acceptable form of development. Subject to the appropriate referral of these proposals to the Mayor of London, and the prior completion of a S106 agreement and appropriate planning conditions, the application should accordingly be approved
- 13.8 The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2021), the policies of The London Plan (2021) and Havering Local Plan 2021, having regards to all relevant material considerations, and any comments received in response to publicity and consultation. It is therefore recommended that planning permission be granted.