



Havering
LONDON BOROUGH

**Strategic Planning
Committee
21 July 2022**

Application Reference:

P0461.22

Location:

Harold Hill Library, Hilldene Avenue

Ward

Gooshays

Description:

Demolition of the existing buildings and structures and redevelopment of the site consisting of the erection of a part 2, part 3, part 4-storey building (with additional plant and enclosures at 5-storey level) to provide for a new hostel facility (Use Class Sui Generis) with 74 rooms for short-term emergency accommodation and 1,499 square metres (GIA) of floorspace for a Health Centre (Use Class E(e)), along with associated hard and soft landscaping, parking, access and highway works.

Case Officer:

John Kaimakamis

Reason for Report to Committee:

The application is by or on behalf of the Council and is a significant development.

1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 1.1 There are no in principle objections to the proposals and through the application of conditions and a legal agreement officers are able to secure a development that would make an important contribution to temporary housing and a medical centre within the Borough.
- 1.2 The approach to site layout, height and massing represents an acceptable approach given the location of the site. This initial scale and design was also reviewed by Members of the Strategic Planning Committee and the Council's Quality Review Panel.
- 1.3 The application seeks permission for temporary/emergency sheltered housing for families, comprising 74 units, alongside a separate medical centre. The applicant aims to replace the existing facility on site, to increase capacity and improve the existing accommodation. This scheme forms the first phase of a wider masterplan within the area, with the council exploring the potential to redevelop the Farnham Road shopping centre and Chippenham Road sites to the south in the longer term.
- 1.4 In land use terms, the proposal would result in increasing the capacity of existing sheltered accommodation as well as introducing a health centre, which would make contributions towards meeting identified need for these land uses. As such, the principle of a hostel-led scheme on the site is considered appropriate subject to compliance with all relevant policies of the development plan.
- 1.5 The recommended conditions and Heads of Terms would secure future policy compliance by the applicant on the site and ensure any unacceptable development impacts are mitigated. Therefore officers consider that all matters have now been sufficiently addressed and the application is recommended for approval.

2 RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission subject to:
 - The prior completion of a legal agreement pursuant to s106 of the Town and Country Planning Act 1990 (as amended) and all other enabling powers, with the following obligations:
 1. Carbon offset fund contribution in respect of shortfall to achieve a 100% reduction in carbon dioxide emissions compared to Part L of the Building Regulations 2013, such sum calculated at ninety-five pounds

(£95.00) per tonne that falls below the 100% threshold, for a period of 30 years, duly Indexed,

2. 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
 3. Contribution to park improvement given shortfall in designated child's play space
 4. Employment and training
 5. Travel Plan (including the appointment of a Co-ordinator)
 6. Dwellings being affordable short term temporary accommodation in perpetuity
 7. The Developer/Owner to pay the Council's reasonable legal costs associated with a planning obligation that includes an Unilateral Undertaking prior to the completion of the agreement irrespective of whether the agreement is completed.
 8. Payment of the appropriate planning obligations monitoring fee prior to the completion of the agreement.
 9. All contribution sums shall include interest to the due date of expenditure and all contribution sums to be subject to indexation from the date of completion of the Section 106 agreement to the date of receipt by the Council.
 10. Any other planning obligation(s) considered necessary by the Assistant Director Planning
- 2.2 That the Assistant Director Planning is delegated authority to negotiate the legal agreement indicated above.
- 2.3 That the Assistant Director Planning is delegated authority to issue the planning permission and impose conditions [and informatives] to secure the following matters:

Conditions

1. Time Limit
2. In Accordance With Approved Drawings
3. Material Samples (including entrance details, mortar, edge, canopies etc)
4. Hard and Soft Landscaping
5. Landscape Maintenance Strategy
6. Medical Centre Floor Plans
7. Secured by Design

8. 95% of the dwellings shall be designed to be Category 2 'Accessible and adaptable' and 5% Wheelchair Adaptable Dwellings
9. Photovoltaic Panel Details
10. Brown/Green Roof Details
11. Medical Centre Roof Plant
12. Mechanical Extract Roof Plant
13. Boundary Treatments including defensible spaces.
14. Fire Strategy
15. Energy Statement Compliance
16. Air Quality Low Emissions Boilers
17. Air Quality Neutral
18. External Lighting Scheme
19. Internal Sound Insulation
20. Noise Protection Buildings
21. Noise Protection Plant Machinery
22. Details of Double Glazing and Acoustically Treated Trickle Ventilators
23. Unexpected Contamination/Remediation Strategy
24. Non-Road Mobile Machinery
25. Surface Water Drainage Strategy
26. Final Sustainable Drainage Systems (SUDs)
27. Water efficiency
28. Site Levels
29. Car Parking Plan (EVCP, disabled spaces)
30. Car Parking Design and Management Plan
31. Vehicle Cleansing
32. Cycle Parking Storage Area Details
33. Cycle Parking Management Plan
34. Demolition and Logistics Plan
35. Construction Method/Management Statement (including Dust Management Plan)
36. Delivery and Servicing Plan
37. Construction Hours (08.00 to 18.00 on Monday to Friday and 08.00 to 13.00 hours on Saturdays).
38. Refuse and Recycling Details (including Management and on site provision)

Informatives

1. Changes to the public highway

2. Highway legislation
 3. Temporary use of the public highway
 4. Adoption of roads
 5. Surface water management
 6. Highway approval required
 7. Community Infrastructure Levy (CIL).
 8. Planning obligations
 9. NPPF positive and proactive
 10. Thames Water Groundwater Risk Management Permit
- 2.4 That, if by 30 November 2022 the legal agreement has not been completed, the Assistant Director Planning is delegated authority to refuse planning permission.

3 PROPOSAL AND LOCATION DETAILS

Site and Surroundings

- 3.1 The site is located within a district centre in Harold Hill, in the northeast of the borough.
- 3.2 To the south of the site, Farnham Road is a post-war development with retail at ground floor level and housing above. To the north and west of the site, recently developed housing is of slightly higher density than the surrounding suburban context, and includes three storey apartments; located to the east is two-storey suburban housing that is more typical of the wider area.
- 3.3 Local Green Belt areas are accessible on foot, due to the relatively peripheral location.
- 3.4 The site falls within Public Transport Accessibility Level Zone 2. There is no rail/tube station in the vicinity, and the nearest station is around 30 minutes' walk to Harold Wood. A regular bus service to Romford Town Centre is located directly in front of the site.

Proposal

- 3.5 The proposal relates to a council-led scheme for temporary/emergency sheltered housing for families, comprising 74 units, alongside a separate medical centre. The applicant aims to replace the existing facility on site, to increase capacity and improve the existing accommodation.
- Proposal includes the demolition of all existing buildings/structures (including Abercrombie House, former Library, and former Boxing Club).

- The 74 dwelling family hostel would be provided in varying sizes of 1 and 2-bed units including wheelchair accessible rooms, replacing the 40 rooms in the existing Abercrombie House hostel.
- The medical centre would be 1,499 sqm (GIA) in size.
- The building would consist of Part-2, Part-3 and Part-4 storey building elements, whilst the proposal also includes all associated infrastructure, plant, access arrangements, parking, central courtyard, public realm and hard/soft landscaping.

Planning History

3.6 The following planning decisions are relevant to the application:

- **F000.20:** Demolition of existing blocks comprising former Harold Hill Library and Boxing Gym. **Approved 20 March 2020**
- **P1276.12:** Redevelopment of the part-vacant 'Hilldene North' site to provide 100 residential units (58% affordable housing) with ancillary car parking and associated landscaping. **Approved 24 January 2013**
- **P1339.16:** Single storey rear extension to increase size of existing restricted Reception Area. **Approved 09 December 2016**
- **P0452.12:** Levelling out to provide car park with new vehicular access from Hilldene Avenue. **Approved 20 July 2012**

4 CONSULTATION RESPONSE

4.1 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

4.2 The following were consulted regarding the application:

- **Thames Water:** No comment and is happy for LBH to determine it as it sees fit.
- **London Fire Brigade:** No objection. No further fire hydrants required
- **Anglian Water:** No objection subject to checking Anglian Water assets informative.
- **Metropolitan Policer Secure by Design Officer:** No objection subject to the attachment of secured by design conditions and informative.

- **LBH Waste and Recycling:** No objections.
- **LBH Flood Officer:** No objection. The proposed Flood Risk Assessment and Strategy is acceptable.
- **LBH Environmental Health (Land Contamination, noise, air quality):** No objection subject to conditions governing contaminated land, air quality neutral, residential boilers, non-road mobile machinery, noise and sound insulation.
- **LBH Highways:** No objection subject to conditions, legal obligations and informatives being applied: construction logistics plan, cycle storage, vehicle access, vehicle cleansing, restrictions on parking permits, highway works under s278 legislation.

5 COMMUNITY ENGAGEMENT

- 5.1 In accordance with planning legislation, the developer has consulted the local community on these proposals as part of the pre-application process and this has been detailed in the submitted Statement of Community Involvement.

6 PRE-APPLICATION DISCUSSIONS

Quality Review Panel (QRP) Comments

- 6.1 The application was presented to the QRP for comments on the 15th June 2021. Members should note that the proposal being presented to them now includes changes to reflect some of the QRP's comments. The following comments were made by the QRP:
- Panel feels that this is a promising scheme and the proposals represent a dramatic improvement on the existing hostel on the site. Massing and heights are appropriate, but panel feels that a more suburban form could be considered within this setting. Panel particularly supportive of the decision to arrange the building around a central communal courtyard, which it feels will be a significant asset, and urges the design team to consider carefully how it could be integrated more fully with how the rest of the building is used. Designing in movement through the space would help and panel suggest that a single storey building at the eastern end of the courtyard would help to achieve this and also provide much-needed additional space within what is a highly congested scheme: panel would like to be reassured that the site is capable of successfully accommodating so many families, albeit temporarily. More work therefore is needed on landscape and amenity space. The

proposed approach to the environmental performance of the scheme, particularly with regard to energy, also requires further development.

- Panel feels that the scheme's architecture and materiality are developing well. The massing and heights of the scheme work well, but the form could be broken up somewhat to give the scheme a more appropriate, suburban character.
- Panel feels that the arrangement of the units is largely successful, and it welcomes the separation of the entrance from the bedrooms. They note that space within all of the units is necessarily tight, but that this is exacerbated within the larger, flexible units that can be adapted to increase the number of bed spaces without a corresponding increase in the amount of living space. The panel would like to see an assessment of the capacity of these units to accommodate activities, such as homework, and consideration given to increasing their size where possible.
- Half of the units have no relationship with the courtyard, and there are a lot of single aspect units facing north, and some facing south. There is potential for providing dual aspect units and the panel would like to see this explored.
- The provision of glazing at the ends of corridors, to allow for natural lighting, is well-intentioned, but the panel feels that this limits the potential for larger, dual aspect units here. It suggests that on top floors, the corridor could instead be lit by sky lights, allowing for larger units on these floors.
- The panel feels that the internal corridors could feel institutional, and the panel would like to see the design team take every opportunity to introduce moments of delight, with inviting spaces for people to linger and seek respite. In particular, it feels that there is potential to reduce the number of cores, making them more generous and introducing courtyard views.
- Communal courtyard is a significant asset to the scheme, but panel feels that further thought should be given to ways in which this space could be better activated and integrated into the building, allowing for increased opportunities for residents to interact in informal settings. The landscape design should be developed to consider the differing needs of residents including spaces of calm as well as spaces for play and socialising.
- E.g., panel suggests opening up the gallery to the courtyard, and locating facilities and circulation routes that necessitate or encourage movement through the space, whilst a free standing, single storey building could be provided at the eastern end of the courtyard to house additional internal amenity, such as space where children could do their homework in relative peace, a communal kitchen and/or lounge.

- Notes that there will be a lot of children resident within the scheme, albeit on a temporary basis, with very limited play space available. Potential to create a degree of conflict over the use of the amenity space available, which will require careful design to accommodate the diverse demands placed up on it.
- Given pressures on amenity space, consideration be given to the potential for using some of the roof space for this purpose, where other uses (such as greening and energy generation) allow.
- Similarly, further consideration given to the potential for providing balconies to the units, in order to create additional amenity space for residents, where this is cost-effective.
- Pleased that early consideration has been given to the street landscape, which it feels will be critical to the success of the scheme and the wider masterplan.
- Proposed courtyard is a promising element of the scheme but, given the number of residents anticipated, it is likely to be heavily used. Would like to see the courtyard divided into different 'rooms' that can allow for quieter enjoyment as well as more active use.
- Proposed medical centre will have an awkward relationship with the courtyard and activating the ground floor elevation to Hilldene Avenue will be challenging; integrating the proposed car parking will also require careful treatment.
- Landscape architect should be appointed early on to help ensure the full potential of both courtyard and wider public realm is realised, particularly around the residential entrance.
- Early thought to issues around sustainable energy, water and drainage, and to move quickly to establish their ambitions for the scheme's environmental performance.
- Pleased proposal is already considering the wholelife carbon of scheme, and welcome intention to use MMC to mitigate this.
- Recognises that it may not be feasible to reuse the existing buildings, consideration should be given to reuse of existing substructures, as well as the reuse of waste materials.
- Notes the early analysis of daylight and overshadowing, and welcomes intention to set back windows to provide some integrated solar shading. However, the south-facing, single aspect units will need particular attention

in this regard and would also benefit from some noise buffering to mitigate the impact of Hilldene Avenue.

- Scheme should be considered in relation to the wider masterplan, both in terms of its character but also with regard to the capacity of the site. E.g., play and amenity space could be provided within Farnham Road, which could also be designed as a safe and attractive route to the park and wider area.
- Clarity needed on the connections beyond the site to public transport routes, cycle networks and existing green space, such as Harold Hill Central Park, which will provide important amenity and play space, particularly for older children.
- Operational and servicing requirements of building will likely result in extensive blank façades at ground floor, particularly along the northern elevation and around the health centre. Design needs to consider carefully how these are treated to activate the adjacent streets.

6.2 The proposals have evolved considerably since being presented to the QRP on the 15th June 2021. A number of positive changes have been incorporated into the final 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.

Strategic Planning Committee Developer Presentation Feedback (7th October 2021)

6.3 A summary of comments received by the Committee were as follows:

- There is a concern that the playspace is not sufficient and further details should be provided
- Concern over the security of children in the accommodation – this should be addressed in the application
- Concern that temporary should not mean inferior in terms of the standard of accommodation
- Assurance is needed as the adequacy of the unit and room sizes
- There is a need to ensure that there are adequate facilities for laundry including equipment and space for ironing of clothes
- Need to ensure adequate facilities and space for cooking and dining
- Request confirmation on average length of stay for residents

- Ensure that all the QRP comments are picked up and addressed
- The relationship between the medical centre and the courtyard needs more consideration. Need further information as to whether the medical facilities and the hostel use, particularly the courtyard can work next to one another.
- More information is required as to the nature of the medical centre, what functions it would have and who it would serve
- Should try not to rely on off-site provision for play space
- Would wish to ensure adequate provision of CCTV monitoring of the premises including the play areas
- Would wish to see improvements to the access and carriageway surrounding the site

7 LOCAL REPRESENTATION

7.1 A total of 127 neighbouring properties were notified about the application and invited to comment. The application has been publicised by way of one or more site notices displayed in the vicinity of the application site for 21 days from 25 April 2022. The application has also been publicised in the local press on 29 April 2022.

7.2 The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: One which objected to the application

Petitions received: No petitions received

7.3 No local groups/societies made representations.

7.4 No Councillors, London Assembly Members, MPs, MEPs made representations.

Representations

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

Objections

- Extension of HMO is wrong and build another doctor's surgery as that is what we need.

Non-material representations

7.6 No non-material issues were raised in representations.

Procedural issues

7.7 No procedural issues were raised in representations.

8 MATERIAL PLANNING CONSIDERATIONS

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

- Principle of Development
- Design
- Quality of Residential Accommodation
- Inclusive Design and Fire Safety
- Secured by Design
- Open Space and Children's Play Space
- Impact on Neighbouring Amenity
- Environmental Issues
- Transport and Highways
- Flooding, Drainage and Urban Greening Factor
- Environmental and Climate Change Implications
- Financial and Other Mitigation
- Equalities

Principle of Development

8.2 The existing site comprises of 40 rooms in the existing Abercrombie House hostel and this is to be replaced with a new 74 dwelling family hostel provided in varying sizes of 1 and 2-bed units including wheelchair accessible rooms. The former Library and Boxing Club would be demolished whilst the proposal also includes the provision of a medical centre that would be 1,499 sqm (GIA) in size.

8.3 Policy H12 of the London Plan supports the delivery, retention and refurbishment of supported and specialised housing which meets an identified need. "The form this takes will vary, and it should be designed to satisfy the requirements of the specific use or group it is intended for, whilst providing options within the accommodation offer for the diversity of London's population, including disabled Londoners within a wider inclusive community setting. Boroughs should undertake assessments of the need for short-term, medium-term and permanent supported and specialised accommodation within their borough."

8.4 Havering Local Plan Policy 6 also supports the provision of appropriate housing to meet the specialist needs of local people and any loss of existing specialist accommodation should demonstrate that the existing accommodation will be adequately re-provided to an equivalent or better standard on-site or elsewhere within the borough.

- 8.5 The proposal would result in a net increase of accommodation on the existing site and also be reprovided in an enhanced form. As such, this would be in compliance with the above regional and local policies. It should be noted that in a report presented to the Council's Cabinet with regard to the wider regeneration of the Hilldene and Farnham Estate, the inadequacy of the existing accommodation within Abercrombie was highlighted stating that it was not ideal for the intended users and can lead to security issues. The proposal to re-provide the hostel accommodation in an updated environment seeks to rectify these concerns.
- 8.6 As such, the development would be in compliance with the aims and objectives of the above policies and the principle of a residential-led scheme on the site is considered appropriate subject to compliance with all relevant policies of the development plan.
- 8.7 With regard to existing social infrastructure being lost, London Plan Policy S1 states that redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan. Havering Local Plan 16 states that proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision will not be permitted.
- 8.8 In this instance, the proposal would result in the loss of former library and boxing club. The library on the site has not been in operation for quite some time and was replaced with a newly constructed library in Farnham Rd in the shopping centre in close proximity to the site, whilst the boxing club operators have vacated to another site on Gooshays Drive. As such, it is considered that these two uses have been reprovided elsewhere within the vicinity of the site and the redevelopment of the site would allow for enhanced hostel accommodation to that currently on the site, as well as a new medical centre to serve the needs of the local population.
- 8.9 Policy S2 of the London Plan supports development proposals providing high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported. Havering Local Plan Policy 16 supports the provision of essential new services and improvement of existing facilities in Havering alongside residential development. The Council will make sure that new and existing residents will have access to a range of social infrastructure facilities.
- 8.10 The provision of a new medical centre would be in compliance with the above policies given the need for healthcare provision within the borough. At this stage though it is unknown who the end user and occupier will be and as such the proposal comes forward as a shell and core and the submitted information

provides indicative layouts for this use. Therefore, a condition is recommended seeking details of the final layout before the medical centre is occupied.

- 8.11 For the reasons outlined above, it is considered that the proposal would accord with the requirements and policies at national, regional and local level with regard to land uses.

Design

- 8.12 The existing buildings on the site consist of various low level building typologies which include single and two-storey buildings. These buildings are dated and make a negative contribution to the townscape in terms of their poor quality design, materials and condition. The site itself is not located within any heritage or conservation designations and there are no listed buildings or other heritage assets adjoining the site.
- 8.13 Development Plan policies seek to secure sustainable development that is of high quality and contributes towards local character, legibility, permeability and accessibility of the neighbourhood. Developments should contribute to people's sense of place, safety and security. Development should have regard to the pattern and grain of spaces and streets in orientation, scale, proportion and mass and be human in scale with street level activity.
- 8.14 The delivery of high quality design is a key objective of the planning system which is to contribute to achieving sustainable development as supported by the NPPF. Sustainable development is further described as including positive improvements in the quality of the built and historic environments including but not limited to replacing poor design with better design. A core planning principle of the NPPF is to always seek to secure high quality design.
- 8.15 NPPF Chapter 12 'Achieving well-designed places' reinforces that this is a key aspect of sustainable development and indivisible from good planning and should contribute positively to making places better for people. Chapter 7 also confirms that high quality design includes consideration of individual buildings, public and private spaces. Policies and decisions should ensure that development amongst other things, responds to local character and history and reflects the identity of local surroundings and materials, whilst not preventing or discouraging appropriate innovation. Also, that they are visually attractive as a result of good architecture and appropriate landscaping.
- 8.16 At a local level, Havering Local Plan Policy 26 promotes high quality design that contributes to the creation of successful places in Havering by supporting developments that are informed by, respect and complement the distinctive qualities, identity, character and geographical features of the site and local area and are of a high architectural quality and design. Further, that they respond to distinctive local building forms and patterns of development and respect the

visual integrity and established scale, massing, rhythm of the building, frontages, group of buildings or the building line and height of the surrounding physical context and are built of high quality, durable, robust, low maintenance materials that integrate well with surrounding buildings.

- 8.17 The proposal represents an uplift in density on the site increasing the footprint of development and introducing a block of up to 4 storeys. Given the existing buildings on site are relatively small-scale and low density in the context of Harold Hill Town Centre, it is considered that appropriate design solutions have been employed to make more efficient use of the site. The district centre location and position on a main road - the site is located at the termination of the Farnham Road shopping precinct, and builds upon the commercial/community use character of the area. Given the characteristics of the surroundings, the scale of the proposal is considered appropriate to the context.
- 8.18 The proposed form and massing generally appear to create an appropriate relationship with the surroundings and the proposal reduces to two-storey adjacent to the property along Hilldene Avenue and three-storey with setback adjacent to the existing house to the east along Bridgewater Road. This resolution of boundaries with neighbouring residential buildings - where smaller scale houses border the site on Bridgewater Road and Hilldene Avenue, is considered appropriate as the proposal steps down in height and leaves sufficient space to avoid significant impacts, whilst the proposal also avoids direct overlooking to rear gardens of neighbouring houses.
- 8.19 The siting of the medical centre to the most prominent frontage of the building along Hilldene Avenue helps to generate activity at street level and adds to the vitality of the wider district centre. The inclusion of this public use also assists in justifying the larger scale of the block in comparison to neighbouring residential uses.
- 8.20 The proposal takes cues from the surrounding area through measures such as use of brick, scale of window openings and limitation of height. It is sensitive to the character of the local area, but does not aim to mimic surrounding buildings too closely. Instead, it helps to build upon and renew the existing character through the integration of a high quality contemporary piece of architecture. Well-proportioned elevations and high quality materials help to achieve this. The proposed external appearance of the building has led to a high quality proposal with the potential to enhance the local area. The innovative use of brick relates well to the surrounding context, while creating a striking contemporary piece of architecture. The proposal has been carefully considered as a whole, with functional elements such as solar shading and ventilation panels designed in a way that enhances the overall scheme. Deep

set window opening create depth within the façade and give a robust appearance.

- 8.21 Whilst the level of detail provided within the planning application helps describe the scheme clearly and thoroughly, helping to ensure quality can be retained in post-planning stages, conditions requiring details and samples of all of the proposed materials are recommended should consent be granted. Additionally, these conditions should ensure that lower quality materials such as composite type cladding and brick slips are not used, as these type of materials would undermine any quality attributed to the design. Consequently, a full size sample panel will be conditioned.
- 8.22 Overall, in terms of detailed architectural design, the proposals have been carefully considered and subject to the conditions outlined above, the proposal will achieve a high quality and appropriate design response which would enhance the character of the building and the surrounding area.

Quality of residential accommodation

- 8.23 Minimum space standards and design criteria for temporary housing in hostels are not set out prescriptively in local or regional policies. Havering Local Plan Policy 6 for specialist accommodation states that the provision of appropriate housing to meet the specialist needs of local people will be supported where the site is suitable for the intended occupiers in terms of the standard of facilities, the level of independence, and the provision of support and/or care, as well as an appropriate level of amenity space is provided to meet the needs of the intended occupants taking account of the need for an attractive outlook.
- 8.24 Policy H12 of the London Plan states that the delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported and the form this takes will vary, and it should be designed to satisfy the requirements of the specific use or group it is intended for. It states that boroughs should undertake assessments of the need for short-term, medium-term and permanent supported and specialised accommodation within their borough.
- 8.25 In this instance, the proposal has been informed by research into comparable developments in London, and with input from managers of LB Havering's existing sheltered housing facilities. The proposed dwellings are smaller than minimum standards for permanent housing as set out in the London Plan, however, it is considered that this approach has been appropriately justified and as such satisfactory. The temporary nature of the housing, the provision of high quality communal facilities and the requirement to maximise provision within the Borough mean that smaller unit sizes are acceptable. The proposal has been designed to provide natural daylight to all habitable rooms, and allow

for privacy with separate bedroom and living spaces.

- 8.26 Further, communal internal spaces are provided at ground floor level to provide breathing space for residents living in relatively small-scale flats. The main communal spaces are provided in close proximity to the main entrance and the courtyard amenity area, making them easily accessible and well observed – this will encourage communal spaces to be well used by a wide variety of residents. The provision of a variety of communal spaces is beneficial, with a busier space within the lobby area, and a quieter space next door that can be used for homework/home working. An additional internal play space provides an area for younger children and is directly accessible from the courtyard.
- 8.27 Similar to the policy requirements for the quality of residential accommodation, a prescriptive mix of accommodation for temporary housing in hostels are not set out in local or regional policies. The London Plan sets out that it should be designed to satisfy the requirements of the specific use or group it is intended for based on that borough assessments, whilst Havering Local Plan Policy 6 states that proposals should demonstrate they contribute to a mixed, balanced and inclusive community and meets the needs of the borough’s specialist needs.
- 8.28 The proposal provides a varying range of unit sizes accommodating up to 5 persons with the majority of units catered to 2-4 persons. The overall unit mix and accommodation sizing has been based on the identified need within the borough and as agreed with the Council department dealing with emergency/short-term housing facilities. This has taken into consideration previous hostel data that were smaller in size and the current proposal would represent an improvement on previous accommodation catering for larger units and providing the opportunity to interconnect units in order to meet any future demand for larger families. Additionally, each unit would now have inclusive kitchen as opposed to communal community facilities as well as separate bathrooms.
- 8.29 Overall, given the density, design and layout of the building proposed, it is considered that the mix of units is appropriate and the layout of the units would result in a satisfactory quality of accommodation given the transient nature of its occupants.

Inclusive Design and Fire Safety

- 8.30 Policy D5 of the London Plan requires that all new development achieves the highest standards of accessibility and inclusive design, ensuring they can be entered and used safely, easily and with dignity by all; are convenient and welcoming (with no disabling barriers); and, provide independent access

without additional undue effort, separation or special treatment, whilst Havering Local Plan Policies 6 and 7 seek 10% of all new homes to be wheelchair accessible.

- 8.31 Further, Policy D6 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'.
- 8.32 Details submitted with the application demonstrate that the development could meet the M4 (2) requirements. These details are to be secured by condition to ensure that the development would be in full compliance with the provision of M4(2). As such, the relevant condition will be applied.
- 8.33 Further, details submitted with the application also demonstrate that the development would provide 4 wheelchair user units (5%). Although this is less than the 10% requirement it should be noted that this is stated for traditional residential dwellings and given the nature of the accommodation the provision put forward is considered acceptable. Therefore the development would also partially comply with the provision of M4(3) and these details are also to be secured via the imposition of a condition.
- 8.34 In accordance with the London Plan Policy D12 on fire safety, the applicant submitted a fire strategy report, produced by a third party suitable qualified assessor.
- 8.35 Further, Policy D5(B5) of the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In developments with lifts, as a minimum, at least one lift per core (or more subject to capacity assessments) should be suitably sized fire evacuation lifts capable of evacuating people who require level access from the buildings. It is noted that evacuation lifts should be provided in addition to Building Regulations requirements for firefighting shafts/lifts to ensure they can be used for evacuation purposes when the firefighting lift is in use by the fire and rescue service.
- 8.36 The fire strategy report states that staff will be trained to operate evacuation lifts during working hours whilst trained security staff will operate evacuation lifts out of hours. As such, the development and the fire safety information satisfy the requirements of Policies D12(A) and D5(B5). Compliance with the fire statement submitted shall be secured through the imposition of a planning condition.

Secured by Design

- 8.37 In terms of national planning policy, paragraphs 92-103 of the National Planning Policy Framework (2021) emphasise that planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. In doing so planning policy should emphasise safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.
- 8.38 The above strategic approach is further supplemented under Policy D11 of the London Plan which encompasses measures to designing out crime to ensure that developments reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. In local plan policy terms, Havering Local Plan Policy 26 is consistent with these national and regional planning guidance.
- 8.39 In keeping with these policies officers have consulted the Metropolitan Police's Designing Out Crime team to review the submitted application. They have commented that the application is acceptable subject to conditions stipulating that prior to the commencement of development the applicant shall be required to make a full and detailed application for the Secured by Design award scheme and thereafter adhere to the agreed details following approval. These conditions will be attached.

Open Space and Children's Play Space

- 8.40 Policy 6 of the Havering Local Plan seeks an appropriate level of amenity space is provided to meet the needs of the intended occupants, whilst Policy 16 requires developments to provide children's play and informal recreation space on-site in line with the London Plan. Where sufficient provision cannot be made on-site the Council will seek developer contributions to remedy deficiencies in quantity, quality, safety, usability and access to open space, sports and recreation facilities across the Borough.
- 8.41 The existing site does not have any areas of designated open spaces and the open areas are predominantly made up of hard surfaced areas with the existing green areas undesignated and distributed across the site in the form of amenity lawns and areas of hard landscaping in between the existing buildings and these spaces do not appear to have a clear function. The proposal is based around a courtyard, creating an external communal amenity space at the heart of the scheme. The ease of access from ground floor internal communal spaces means the courtyard is likely to be well used, providing good interaction between inside and outside. Passive observation from residential

accommodation above is beneficial in terms of supervising children and discouraging any anti-social behaviour. The proposed planting, seating and lighting strategies are appropriate. The lack of private external amenity spaces to residential units will add additional pressure on the courtyard, but the proposed landscape strategy makes good use of space and provides a wide range of facilities within a limited area.

8.42 As stated above Policy 16 of the Local Plan seeks to achieve the provision of adequate children's play space in line with London Plan standards. Policy S4 of the London Plan states that residential developments should incorporate high quality, accessible play provision for all ages, at least 10 square metres per child. Play space 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.

8.43 The GLA's play space calculator (2019) would generate a requirement of 1600 square metres of play space for the development. The applicant has stated that a total of 1,130 square metres of the courtyard amenity space has been designed as playable space. This figure in essence includes nearly all of the 1,250 square metres communal open space and quite clearly not all of this space is designated play space. It is considered that this shortfall be mitigated through a financial contribution to improve off-site play space provision at nearby parks within the vicinity of the site. The principle of mitigating the shortfall with an off-site contribution is considered acceptable, however it is considered that the shortfall is much greater than 470 square metres. The 1130 square metre figure of provision by the applicant in essence includes all of the communal open space and quite clearly not all of this space is designated play space. Some of these areas are defensible spaces, other includes pathways and also general communal areas. Whilst some of these areas would form a dual purpose and allow for child's play, it is not appropriate to include all of the communal open space provision in this calculation. As such, the financial contribution for off-site provision will be calculated on an accurate assessment of designated play space within the proposal only.

Impact on Neighbouring Amenity

8.44 The proposal site is in relatively close proximity to a number of adjoining properties. Residential amenity comprises a range of issues which include daylight, sunlight, overlooking, overshadowing impacts, as well as sense of enclosure and a loss of outlook. These issues are addressed in turn below.

- 8.45 The Development Plan contains policies which seek to appropriately safeguard the amenities of residential occupiers when considering new development. Havering Local Plan Policy 7 seeks to protect the amenity of existing and future residents and support developments that do not result in unacceptable overlooking or loss of privacy or outlook; unacceptable loss of daylight and sunlight; and unacceptable levels of noise, vibration and disturbance. The Residential Design SPD states that new development should be sited designed such that there is no detriment to existing residential amenity through overlooking and/or privacy loss, dominance or overshadowing, and a reduction of daylight and sunlight levels.
- 8.46 Policy D3 of the London Plan (Optimising site capacity through the design-led approach) states that development proposals should deliver appropriate outlook, privacy and amenity. Further, Policy D7 (Housing quality and standards) states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 8.47 It is widely acknowledged that daylight and sunlight are fundamental to the provision of a good quality living environment and for this reason people expect good natural lighting in their homes. Daylight makes an interior look more attractive and interesting as well as to provide light to work or read by. Sunlight provides light and warmth, makes rooms look bright and cheerful and has a therapeutic, health-giving effect. In addition, daylight can reduce the need for electric lighting and sunlight can contribute towards meeting some of the heating requirements of homes through passive solar heating. Inappropriate or insensitive development can reduce a neighbour's daylight and sunlight and thereby adversely affect their amenity to an unacceptable level.
- 8.48 During the course of pre-application discussions, the proposal was revised to reduce the height and massing. More specifically, the height of the building as it adjoined the two neighbouring properties to the northeast and south east were stepped down in height as well as introducing greater setbacks from the neighbouring boundaries. Therefore, given the scale and massing of the proposal to the east, it is considered that there would only be some limited impact on the outlook of the property to the northeast but not significant in itself to warrant a refusal.
- 8.49 Both the Havering Local Plan and London Plan reference the Building Research Establishment (BRE), which provides guidance on site layout planning to achieve good sunlighting and daylighting. It is intended for building designers, developers, consultants and Local Planning Authorities (LPAs).

- 8.50 The application was accompanied by a sunlight and daylight report which provided an assessment of the proposal in terms of its relationship with existing neighbouring buildings which surround the site to the east, north and west. The submitted report assessed the development against the BRE methodologies relating to daylight [Vertical Sky Component (VSC) and No Sky Line (NSL)], sunlight [Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH)], and overshadowing [sun on ground assessment].
- 8.51 When considering the sunlight and daylight information relating to the impact of the proposal on the amenity of neighbouring properties, there were some results that had transgressions above the BRE guidelines with specific regard to properties to the north along Bridgewater Rd as well as the property at 161 Hilldene Avenue. Officers consider that the impact on daylight in accordance with BRE terminology would be that of a predominantly minor adverse impact with some isolated instances of moderate impact. It should be noted that this limited impact does not apply across all of the tests above to individual properties but rather in some instances of one or two of the tests above.
- 8.52 Officers have assessed all of the daylight/sunlight information as well as the distance/height ratio regarding outlook, and consider that the overall impact of the proposals in terms of the above tests would be at levels that are considered acceptable for a scheme of this nature that seeks to bring forward the delivery of land uses that are in need within the borough. As such, it is considered the predominantly minor impact with some isolated instances of moderate impact on daylight is outweighed by the public benefits of the scheme.
- 8.53 A noise assessment has also been submitted with the application which has been reviewed by the Council's Environmental Health officer. The report addresses a number of the considerations regarding the development, particularly the protection of the new residents from noise from the neighbouring roads, and also the neighbouring residential properties from plant noise at the new development.
- 8.54 The report indicates that, due to the low background noise level on Hilldene Close and Bridgewater Road, that the standard condition for new plant will not be achievable when measured at the neighbouring residential properties. The noise consultant has suggested a 5dB limit, rather than the standard 10dB limit, below background noise. Environmental Health officers have not objected to this in principle, as the suggested targets within the noise report are below the requirements within BS8233, and therefore should not cause a loss of amenity to the residents in the area. Environmental Health have also recommended conditions to prevent the possibility of the plant on the roof causing possible issues to the new residents by way of vibration through the structure.

- 8.55 It should also be noted that during the course of pre-application discussions, as well as during the course of the planning application, the extent of roof plant on the roof has been reduced considerably so that only the amount that is actually necessary has been maintained. This has resulted in less screening and built form areas at roof level and are considered an improvement on the originally submitted proposals. Conditions are to be imposed with regard to the mechanical extract to the northeast so that its specific use is limited to emergency use only, whilst the indicative layout for the medical centre is also to be conditioned so that details are submitted to minimise the extent of plant required to what is essential and necessary only.
- 8.56 Finally, the Environmental Health officer has also recommended conditions relating to noise from plant, internal sound insulation between residential units, noise from internal ducting/plant, noise from external environmental factors, acoustic glazing, restricted hours of construction and deliveries, a construction method statement and a lighting study so as to protect the amenity of neighbouring properties. These conditions would be imposed should planning permission be granted.

Environmental Issues

- 8.57 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.
- 8.58 A Contaminated Land study was undertaken during the outline application stage. Council's Public Protection officer has recommended conditions seeking an updated Desktop Study and Site Investigation should unexpected contamination become apparent, as well as Remediation Strategy and Verification Report. It should also be noted that the site is brownfield land and currently benefits from the same land use. Nevertheless, some remediation and contamination works may be required should unexpected contamination issues come to light. These will be secured via conditions.
- 8.59 The proposed development is located within an area of poor air quality which suffers from high concentrations of nitrogen dioxide and particulate matter. 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.

- 8.60 Furthermore, conditions are recommended to safeguard a Dust Management Plan (and including a Dust Monitoring Scheme) so that dust and emissions controls measures are employed on the site during construction.

Transport and Highways

- 8.61 Havering Local Plan Policy 6 for specialist accommodation states that such housing will be supported where it can be demonstrated that the proposal meets the parking requirements set out in Policy 24 and it will not have an unacceptable impact on parking conditions and traffic congestion in the area and that adequate provision for visitor and carer parking facilities is provided and where appropriate, provision is made for the safe and convenient storage of wheelchairs and mobility scooters.
- 8.62 The site falls within Public Transport Accessibility Level (PTAL) Zone 2. There is no rail/tube station in the centre, and the nearest station is around 30 minutes' walk to Harold Wood. A regular bus service to Romford Town Centre is located directly in front of the site. Given the PTAL rating of 2 minimum residential parking standards are not applicable.
- 8.63 Policy 24 seeks to ensure that all new developments make adequate provision for car parking. A Transport Assessment has been submitted with the planning application as is required for all major planning applications. In this instance, the proposals would comprise of a total of 12 car spaces of which 4 would be for blue badge holders with accessibility requirements. These are to be provided along Hilldene Close to the west of the application site along with an ambulance pick up/drop off bay. The 8 car spaces will serve the hostel accommodation whilst the 4 disabled car spaces would be shared between both the hostel accommodation and medical centre. The users of the medical centre would predominantly be those who would live locally with opportunities to walk, cycle or use public transport to visit the site, whilst those that would require to drive would be able to use the pay and display car park opposite the site on Hilldene Avenue.
- 8.64 With regard to the hostel accommodation, London Plan Policy T6.1 states that large-scale purpose-built shared living and other sui generis residential uses should be car-free. As such, for those few residents that may require to use a car this additional car parking demand can be accommodated within the locality. The site forms part of the Harold Hill District Centre and therefore the local needs of residents can be accommodated without the need for vehicles. As such, it is considered that the proposed number of spaces are appropriate.

- 8.65 Other matters to be secured by condition are (20% active and all remaining spaces passive) electrical vehicle charging points in line with the London Plan, as well as a Car Parking Design and Management Plan to ensure that the disabled car parking is used only by Blue Badge holders and arrangements for meeting any future demand for such provision.
- 8.66 Further, a total of 85 cycling spaces are to be provided for the hostel accommodation. This comprises 20 secure spaces to be accessed from Bridgewater Rd, whilst a further 65 children's cycle spaces are to be provided within the courtyard and this approach has been informed by the operational needs of the hostel operator. With regards to the Health centre, 7 long stay spaces are proposed while 12 short stay spaces are proposed on street. Given the lack of details of these spaces, a condition will be attached to ensure it complies with the London Cycle Design Standards (LCDS).
- 8.67 Subject to the completion of an s278 legal agreement for highway changes 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 developments within this area.
- 8.68 Finally, a Travel Plan is to be secured via the s106 legal agreement, and a Construction Logistics Plan and a Delivery and Servicing Management Plan are to be secured via condition.

Flooding, Drainage and Urban Greening Factor

- 8.69 Guidance under the NPPF seeks to safely manage residual risk including by emergency planning and give priority to the use of sustainable drainage systems.
- 8.70 In order to address current and future flood issues and minimise risks in a sustainable and cost effective way, the London Plan emphasises that new developments must comply with the flood risk assessment and management requirements and will be required to pass the Exceptions Test addressing flood resilient design and emergency planning as set out within the NPPF and the associated technical Guidance on flood risk over the lifetime of the development. Furthermore, it stresses that development should utilise sustainable urban drainage systems (SUDS) and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 8.71 In terms of local planning policies, Havering Local Plan Policy 32 emphasises that development must be located, designed and laid out to ensure that the risk

of death or injury to the public and damage from flooding is minimised whilst not increasing the risk of flooding elsewhere and ensuring that residual risks are safely managed. The policy highlights that the use of SUDS must be considered.

- 8.72 The application site is located within Flood Zone 1 and in an area benefitting from flood defences and generally has a low and very low risk of surface water flooding. The drainage officer has confirmed that the submitted details are acceptable subject to conditions. Therefore subject to conditions the proposal is acceptable.
- 8.73 Sustainable urban drainage systems have been incorporated into the proposal with communal green spaces which would have soft landscaping and planting. The above ground SUDS measures would provide biodiversity benefits and help to provide a 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.
- 8.74 Policy G5 of the London Plan sets an Urban Greening Factor (UGF) target score of 0.4. The proposal provides a UGF assessment of the proposal, which achieves a score of 0.30. This would be achieved through a range of urban greening measures, including landscaping, natural vegetation and tree planting across the site. Whilst the 0.3 score falls short of the London Plan target score, this should be read in the context that the existing UGF of the site which is lower and the proposal would represent a net gain in UGF.

Environmental and Climate Change Implications

- 8.75 In recognising the importance of climate change and the need to meet energy and sustainability targets, as well as the Council's statutory duty to contribute towards the sustainability objectives set out within the Greater London Authority Act (2007), the London Plan requires all major developments to meet targets for carbon dioxide emissions. This is targeted with the eventual aim of zero carbon for all residential buildings from 2016 and zero carbon non-domestic buildings from 2019. The policy requires all major development proposals to include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy.
- 8.76 The Mayor of London's SPG on *Housing* (2016) applies a zero carbon standard to new residential development, and defines zero carbon homes as homes forming part of major development applications where the residential element of the application achieves at least a 35 percent reduction in regulated carbon dioxide emissions (beyond Part L 2013) on-site. Furthermore, the Mayor of London's SPG on Sustainable Design and Construction (2014) provides

guidance on topics such as energy efficient design; meeting carbon dioxide reduction targets; decentralised energy; how to off-set carbon dioxide where the targets set out in the London Plan are not met.

- 8.77 In terms of the Havering Local Plan, Policy 36 (Low carbon design and renewable energy) seeks to optimise the energy efficiency of buildings and support low carbon and renewable energy developments including energy efficiency improvements to existing buildings. The Council requires major development proposals to include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction set out in the London Plan will be met. The Council will require a cash in lieu contribution to the Council's Carbon Reduction Fund on any shortfall to secure the delivery of carbon dioxide savings elsewhere.
- 8.78 The submission has been accompanied by an energy strategy which proposes a 56% reduction in carbon dioxide emissions on the scheme through energy efficient measures. This exceeds the minimum on-site carbon reduction targets set out in the London Plan. The remaining 44% shortfall in CO₂ emissions in meeting the zero carbon policy would be met through a carbon off-set payment secured via the legal agreement.
- 8.79 A site-wide heat network supplied by a centralised energy centre is proposed which would provide heat for all the residential units, and which would be powered by a combination of Air Source Heat Pumps and efficient gas boilers. Roof mounted solar panels are also proposed which would be incorporated with green/brown roofs. These are to be secured via condition. Although there are no existing or planned district heat networks, the scheme should be future proofed to enable connection to a DHN should one come forward at a later date and this is to be secured via the legal agreement.

Financial and Other Mitigation

- 8.80 Chapter 14 of the Havering Local Plan emphasises that in order to comply with the principles as set out in several of the Policies in the Plan, contributions may be sought and secured through a Planning Obligation. The London Plan also states that development proposals should address strategic as well as local priorities in planning obligations.
- 8.81 From a sustainability perspective, the proposal is accompanied by a Sustainability Statement and Energy Statement. Any remaining shortfall in CO₂ emissions would be met through a carbon off-set payment secured via the legal agreement. Council's Highway officer has also recommended a restrictions on parking permits. Additionally, the shortfall in designated children's play space

is to be mitigated through a financial contribution to improve off-site play space provision at a nearby park to the east of the site.

- 8.82 In light of the above and discussions in other parts of this report the proposal would attract some necessary section 106 provisions to mitigate the impact of the development on the wider infrastructure within the Borough.
- 8.83 The proposal would attract the following Community Infrastructure Levy contributions to mitigate the impact of the development.
- 8.84 The Mayor has established a CIL charging schedule with a recent amendment that came into force from 1st April 2019. The amendment increases the CIL contribution by £5 per square metre to £25. The proposed development would be liable for this charge with regard to the hostel use subject to any existing building credit while the health centre use would be exempt.
- 8.85 The London Borough of Havering's CIL was adopted in September 2019. As the proposed floor area for the development is 15,354sqm and the CIL charging schedule applies a charge of £125 per sqm to any development in Zone A (any development north of the A1306). Therefore the levy would be applicable for the proposed development with regard to the hostel use subject to any existing building credit or social housing relief (if applicable), while the health centre use would be exempt.

Equalities

- 8.86 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
- 8.87 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.
- 8.88 Policy CG1 of the London Plan also seeks to support and promote the creation of an inclusive city to address inequality. In view of the stakeholders affected by the development proposals, the most significant impacts in this case relate to the protected characteristics of age, disability and gender. It is considered that there would be no communities falling under the list of "protected characteristics" that would be significantly or unduly harmed by the proposals.

- 8.89 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.
- 8.90 In light of the above, the proposals are considered to be in accordance with national regional and local policy by establishing an inclusive design and providing an environment which is accessible to all.

Conclusions

- 8.91 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires the Council to determine any application in accordance with the statutory development plan unless material considerations indicate otherwise. All relevant policies contained within the Mayor's London Plan and the Development Plan, as well as other relevant guidance and material considerations, have been carefully examined and taken into account by the Local Planning Authority in their assessment of this application.
- 8.92 The preliminary proposals for the site were subject to consideration by the Quality Review Panel and Strategic Planning Committee and comments made in these forums have had some input into the development.
- 8.93 The application seeks permission for temporary/emergency sheltered housing for families, comprising 74 units, alongside a separate medical centre. The applicant aims to replace the existing facility on site, to increase capacity and improve the existing accommodation. This scheme forms the first phase of a wider masterplan within the area, with the council exploring the potential to redevelop the Farnham Road shopping centre and Chippenham Road sites to the south in the longer term.
- 8.94 In land use terms, the proposal would result increasing the capacity of existing sheltered accommodation as well as introducing a health centre, which would make contributions towards meeting identified need for these land uses. As such, the principle of a hostel-led scheme on the site is considered appropriate subject to compliance with all relevant policies of the development plan.
- 8.95 It is considered that the development would result in some limited harm to the amenity of neighbouring properties with regards to daylight however this would not be outweighed by the public benefits of the scheme outlined above.
- 8.96 In addition to the Mayoral and Havering Community Infrastructure Levy, the application is supported by a s106 planning agreement and contributions related to and mitigating impacts of the scheme. For these reasons and all the

detailed matters considered in this report, the scheme is acceptable subject to conditions, informatives and the s106 legal agreement.

- 8.97 In light of the above, the application is **RECOMMENDED FOR APPROVAL** in accordance with the resolutions and subject to the attached conditions and completion of a legal agreement.