

Application Reference:	P2072.22
Location:	The Seedbed Centre and Rom Valley Retail Park, Rom Valley Way, Romford, RM7 0AZ.
Ward	St Albans
Description:	Outline phased development incorporating details of access to the site with all other matters reserved for a comprehensive redevelopment comprising demolition of existing buildings and redevelopment of the site for a mix of uses built over 3-12 storeys to include up to 840 residential units (Class C3), at least 3,000sqm light industrial (Class E) and general industrial (Class B2) uses, retail / restaurant / café up to 200sqm, associated landscaping, public realm, parking, refuse storage and other associated works.
Case Officer:	Richard Byrne
Reason for Report to Committee:	The application is referable to the Mayor of London under the Town and Country Planning (Mayor of London) Order 2008.

1.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 1.1 This report sets out the detailed considerations for the outline planning application on land at Rom Valley Way in Romford, a site known as Seedbed Centre and Rom Valley Way Retail Park. The application is for the comprehensive redevelopment of the site for a mixed use development which is residential led and would deliver up to 840 new homes as well as a minimum of 3,000sqm of industrial floorspace, plus retail and leisure floorspace, public and private open space, highways improvements, landscaping and other benefits such as the naturalisation of the River Rom. 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.
- 1.2 The approach to site layout, height and massing has been given carefully consideration with regard to the location of the site. Where the proposal exceeds the council's expectations the

harm is appropriately mitigated/balanced out overall. 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 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. The scheme has appropriately retain a significant level of industrial floorspace given the policy designation of part of the site.
- 1.4 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.
- 1.5 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.
- 1.6 The recommended conditions and Heads of Terms would secure future policy compliance by the applicant on the site and ensure any unacceptable development impacts are mitigated.
- 1.7 Officers consider the proposal to be acceptable, subject to direction from the Mayor for London, the completion of a Section 106 legal agreement and conditions.

2.0 RECOMMENDATION

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

- Any direction by the London Mayor pursuant to the Mayor of London Order
- Prior to completion of a legal agreement to secure the following planning obligations:

Affordable Housing

- 11% (by habitable rooms) of units (85 units) of which, the tenure split is 30% intermediate (25 units) and 70% Social Rent (60 units).
- Of the total amount of affordable housing the Social Rent would comprise 10% for 1 Bed 2P, 40% for 2 Bed4P, 40% for 3 Bed 6P and 10% for 4 Bed 6P
- Early, mid and Late Stage Viability Review mechanisms to enable up to 35% affordable housing.

In terms of grant funding, the applicant has detailed that the provision of 10% Affordable Housing is not contingent on the receipt of grant subsidy (i.e. the S106 will not seek to secure a lower quantum where grant is not available). A grant mechanism can be included in the S106 which requires the developer to apply for grant ahead of each RMA and to increase the affordable housing where grant is provided.

Highways

- For the improvement of Rom Valley Way between the roundabout and edge of the site for cycle way, footway and highway improvements - £1.4million;
- The provision of 1 car club space on the site and 2 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;

- 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.
- Towards further consultation/assessment/implementation of a local Controlled Parking Zone

Education provision

- The land pursuant to P2071.22 shall be safeguarded for the purposes of a new school for a defined period
- The applicant shall grant LBH an option to require the transfer of the applicant's interest in the school site (including all necessary rights of access over the applicant's retained land
- The transfer of the school site to LBH for a nominal consideration (or its nominated school provider) is on the basis that it shall only be used as a school
- If LBH elects not to exercise the option of delivering the school, then the applicant will pay a section 106 financial contribution towards education provision in the borough.

NHS Healthcare contribution

- Total contribution - £2,913,731

Carbon offset

- To prepare and submit an updated energy statement;
- To pay the relevant carbon offset contribution to the local authority carbon offset fund pursuant to the approved updated Energy Assessment. (On the basis of the indicative scheme the financial contribution of £1,388,011).

Public Open Space Enhancements and Play Space

- A detailed scheme to show how public open space and play spaces are set out and enhanced to achieve policy compliance within each phase;
- Demonstration that sufficient enhancements, the public open spaces and play spaces can be provided cumulatively across the site to achieve policy compliance if provision falls short proportionally to the occupiers within a phase;
- Demonstration how the public open spaces and play spaces are brought into use and made available for future occupiers and members of the public during and post completion of 1) the relevant phase and 2) any adjacent phases which may have an impact in respect of public safety;
- A contribution for offsite public open space should on site provision fall short of policy compliance – level to be determined.

Employment

- A scheme to identify where a minimum of 10% total gross commercial floorspace as affordable workspace for a minimum of 5 years is within the development and a timetable of how it will be provided and its provision.
- Submission and approval by the council of a training and recruitment plan
- Submission and approval by the council of an education commitments Plan
- Provide Skills Training Roles for construction apprenticeships
- Secure that at least 20% for local suppliers during the construction.
- In the event that the skills training roles have not been achieved in relation to a phase and/or the target for employment to local residents are not achieved and/or 20% of local are not used to pay a Skills Training Shortfall Contribution and/or a local employment shortfall contribution and / or a Local supplier shortfall contribution prior to occupation of that phase using a formula

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 (irrespective of whether the agreement is completed) and a further financial obligation (to be agreed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligations.

2.3 That the Director of Planning is delegated authority to negotiate the legal agreement indicated above and that if not completed by the 31st August 2024 the Director of Planning is delegated authority to refuse planning permission or extend the timeframe to grant approval.

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

Proposed Conditions:

1. Time Limit
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 (840)
11. Minimum amount of industrial space to be provided (3,000sqm)
12. Partial Discharge – Allows for Phasing of development
13. Approval of Materials
14. Access to Phases
15. Accessibility and Management Plan - Residential
16. Accessibility and Management Plan- Non-Residential
17. Accessibility of Public Realm
18. Car parking design and management plan
19. Occupier and Visitor Cycle Parking
20. Boundary treatments
21. Secure by Design
22. Accessibility and Adaptability – M4(2) and M4(3) housing
23. Refuse Storage and Segregation for Recycling/Refuse Collection Strategy
24. Energy strategy
25. Energy compliance
26. Overheating modelling
27. Urban Greening Factor
28. Biodiversity Enhancement Strategy
29. Accordance With Ecological Appraisal Recommendations
30. Construction Environmental Management Plan for biodiversity
31. Concurrent With Reserved Matters: Biodiversity Net Gain Plan
32. Concurrent With Reserved Matters: Landscape And Ecological Management Plan
33. Wildlife Sensitive Lighting Design Operational Scheme
34. Further Surveys for Developments Phased over a Long Period
35. Living Roofs
36. Nesting Birds and Bat Roosts
37. Bird Hazard Management Plan

38. Protection of Trees
39. Vegetation Clearance
40. Examination of Trees for Bats
41. Air Quality Assessment
42. Kitchen Ventilation Equipment
43. Airborne Noise - Purpose built houses
44. Airborne Noise - Flats
45. Noise levels from plant and machinery
46. Noise from site
47. Noise from mechanical ventilation
48. Road Noise
49. Hours of Operation- Non-Residential – 0700 to 2300 (Deliveries 0700 to 2100)
50. Lighting Strategy – including safety lighting for tall buildings
51. Flood Risk
52. Drainage Strategy based on SuDs Principles
53. Drainage Maintenance
54. Piling (including vibration) Method Statement
55. Non-Road Mobile Plant and Machinery (“NRMM”)
56. Oil Interceptors
57. Contamination Remediation Scheme
58. Unexpected Contamination
59. Construction Environmental and Site Waste Management Plan
60. Recycling and Waste Reporting
61. Whole Life Cycle Carbon assessment
62. GLA 'Be Seen' energy monitoring requirements
63. Demolition and Construction Hours(8am to 6pm Mon-Fri, 8am to 1pm Sat, none Sunday and Bank Holidays)
64. Foundation Design
65. Circular Economy Statement, monitoring report and completion report
66. Permitted Development Withdrawal, including use classes restriction and fencing
67. Satellite Dishes
68. Fire Safety
69. Daylight\sunlight
70. Cranes
71. Delivery and servicing plan for residential uses
72. Delivery and servicing plan for non-residential uses
73. Archaeology (Written Scheme of Investigation)
74. Archaeology (Display and Interpretation)
75. Water efficiency

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
9. Contaminated land
10. Refuse
11. Deemed discharge
12. Pre-commencement conditions
13. Highway legislation

14. Temporary use of the public highway
15. Adoption of roads
16. Surface water management
17. Highway approval required
18. Secure by design
19. Community Infrastructure Levy (CIL)
20. NPPF positive and proactive

3.0 **SITE AND SURROUNDINGS**

- 3.1 The application site is located on the eastern side of Rom Valley Way and comprises two separate elements: The Seedbed Centre, Davidson Way and the Rom Valley Retail Park, Rom Valley Way. The Seedbed Centre element is located to the north-east of the wider site with access from Davidson Way. The Rom Valley Retail Park element of the site fronts Rom Valley Way, the A125. The application site consists of circa 40 small industrial / commercial units, with an associated café and car parking. There are also five two-storey retail warehouse units and a single-storey restaurant.
- 3.2 To the north of the site is a Homebase retail warehouse with ancillary parking. To the north of the Homebase site is Oldchurch Road (the Ring Road) with the Bridge Close site with proposed development currently at pre-application stage. (PE/00213/2017 – a mixed use development including up to 1,070 homes, a school and commercial units). To the north-east, east and south of the site beyond the River Rom which forms the eastern boundary to the site, residential properties such as Victorian Villas on South Street and also the apartment block – The Maltings. This area is predominantly suburban 2 to 3-storey residential dwellings and 4-storey apartments fronting South Street, with car parking and back gardens on the eastern bank of the river.
- 3.3 To the west, this is defined by the Rom Valley Way, a busy four lane highway. Opposite this, there is the former Ice Rink Site (P0615.21) which has an extant Hybrid permission 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.
- 3.4 The Seedbed Centre is identified as a Locally Significant Industrial Site (LSIS) and falls within the Romford Strategic Development Area and London Plan Opportunity Area. The site is irregularly shaped 2.75ha, measuring approximately 270m north to south and 130m from west to east. The site is located to the south of Romford Town centre and some 500m from Romford Railway Station. There is a PTAL rating for the site of between 6a (Excellent) - 4 (Good), where 0 indicates extremely poor access to public transport and 6b indicates excellent access to public transport.
- 3.5 The River Rom corridor to the east of the site is located within Flood Zone 2/3a. There are no listed buildings at or near the site and it does not fall within a Conservation Area; however, the site does fall within Havering Archaeological Priority Areas (1).
- 3.6 The site slopes down from the east to the west and north to the south, with maximum levels of difference of approximately 1.5m. There is a drop in levels from the site down to the River Rom of between 1 and 1.5m.
- 3.7 The Seedbed Centre currently has a total of 2,987sqm; comprising 1,788sqm (B1C/B2/B8, now Class E/B2/B8), 724sqm (B1a, now class E), 253sqm (A1, now class F2), 223sqm (Sui Generis) of floorspace whilst the Rom valley Retail Park has 7,097sqm (6,787sqm A1 (now class E(a)) and 310sqm A3 (now class E(b)) of floorspace.

4.0 DESCRIPTION OF PROPOSAL

- 4.1 The application has been submitted in outline with details of 'means of access' to the site being provided with all other matters reserved. The scheme proposes a comprehensive, phased, mixed use development of the site. The outline planning application (OPA) seeks approval for:

Access - 'means of access' forms part of the outline submissions and is defined as, 'accessibility to and within the site for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how they fit into the surrounding network'.

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

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. The planning application seeks approval of parameters associated with the location of built development and associated key open spaces and routes as set out in the Parameter Plans;

Scale – the upper and lower limit for the heights of buildings, building setbacks and number of storeys. The parameters for the maximum height of buildings are set out in the Parameter Plans;

Appearance - The planning application seeks approval of a Design Code to establish a set of Design Guidelines; and

Landscaping – an indicative layout and potential species to be planted. The planning application seeks approval of landscaping guidelines via the Design Code.

- 4.2 As such, details of the layout, scale, appearance and landscaping of the development (other than those outlined above and set by the **Parameter Plans, Development Specification** 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.

- 4.3 Although all matters are reserved excluding means of access, the outline planning application (OPA) sets out the following principles for the outline part of the site:

Buildings to be demolished

- 4.4 The proposed development would entail the demolition of all the buildings and structures at the Seedbed Business and Rom Valley Retail Park.
- 4.5 The demolition will however be phased to allow the re-housing some of the existing light industrial space in the Seedbed Centre to ensure that no less than 3000 square metres of employment floorspace is maintained within the site. Block E within the existing Seedbed Centre, which equates to 1,000sqm, will not be demolished until the final phase (No. 5). Access to block E will be maintained from the existing northern entrance until phases 1, 2 and P3a & b are implemented. Once implemented access will be provided to block E from the southern access. Once all the new replacement employment space is provided in phases P1 to P4 then demolition of block E can take place as part of the delivery of the final phase (P5).

Description of the Development

- 4.6 The applicant has detailed that works would be undertaken over five phases and that further supporting documents in relation to phasing will be provided at reserved matters stage in order to allow flexibility. It is however detailed that the majority of the delivery of employment floorspace will be included in Phase 1 in order for the proposals to be Planning Policy Compliant and maintain the protection of the employment floorspace currently at the Seedbed site (LSIS designation).
- 4.7 The submitted Parameter Plans set out the development zones that comprise the masterplan for the site. These are also further detailed within the Development Specification Document, DAS and Design Code. It is intended that reserved matters applications would be submitted in accordance with the phasing of the development.
- 4.8 There are six Plots; Plots A1, A2, B, C, D1 and D2:

Description of each phase <i>Development Plot is shown in fig 1</i> <i>Phasing is indicative and is shown in fig 2</i>
<p>Phase 1 - Plot A1</p> <ul style="list-style-type: none"> • 186 Residential dwellings • Light industrial provision 1,531sqm • General industrial provision 47sqm) <p>This phase will deliver new homes and a large proportion of the light industrial workspace, re-housing 85% of the existing light industrial space in the Seedbed Centre with adjoining streets and public realm.</p>
<p>Phase 2 – Plot A2</p> <ul style="list-style-type: none"> • 152 Residential dwellings, • light industrial provision 987sqm • General industrial provision 47sqm <p>This Phase will continue the delivery and re-provision of the Seedbed Centre. Moving most of the remaining tenants from the Seedbed Centre.</p>
<p>Phase 3a – Considered under separate application P2071.22</p> <ul style="list-style-type: none"> • Two Form Entry School • Soft landscape area on the north side of building • Enclosed hard landscaping on the south side of the building
<p>Phase 3b – Plot B</p> <ul style="list-style-type: none"> • 66 Residential dwellings • 54 sqm flexible retail, restaurant and café uses (Class E)
<p>Phase 3c</p> <ul style="list-style-type: none"> • Works along the River Rom improvement will also commence in this phase.
<p>Phase 4 – Plot D2</p> <ul style="list-style-type: none"> • 169 Residential Dwellings • Light industrial provision 435sqm • 105 sqm flexible retail, restaurant and café uses (Class E)
<p>Phase 5 – Plot D1</p> <ul style="list-style-type: none"> • 127 Residential dwellings • 41 sqm flexible retail, restaurant and café uses (Class E)

4.9 The proposal varies in height and a range of maximum and minimum heights are outlined on the submitted parameters plans. It is intended that the blocks will vary between 3 and 12 storeys:

- Plot A1 – 3-12 storeys
- Plot A2 – 3-12 storeys
- Plot B – 6-8 Storeys
- Plot C – 3-8 storeys
- Plot D1 – 3-9 storeys
- Plot D2 – 3-12 storeys

4.10 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 with the inclusion of various parks sheltered from the activity along Rom Valley Way.

Access and Routes

4.11 The accompanying Design & Access Statement and Design Code outline the development layout. The Development is anticipated to be primarily car free, however, 26 residential accessible Blue Badge spaces, one car club space, 16 work spaces users parking areas and 1 blue badge space for workplace users. There are also 1,550 cycle spaces (22 for visitors).

Overall Amount of Development Proposed

4.12 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	Proposed maximum units / floorspace (sqm GEA)
Residential (Class C3)	Up to 840 units or 83,365sqm
Light Industrial (Class E)	2,953sqm (+1,989sqm associated back of house area)
General Industrial (Class B2)	47sqm
Retail / Food & Drink (Class E)	200sqm

Phasing

4.13 The development would come forward on a phased basis and anticipated there would be five phases of development (set out on the plan below):

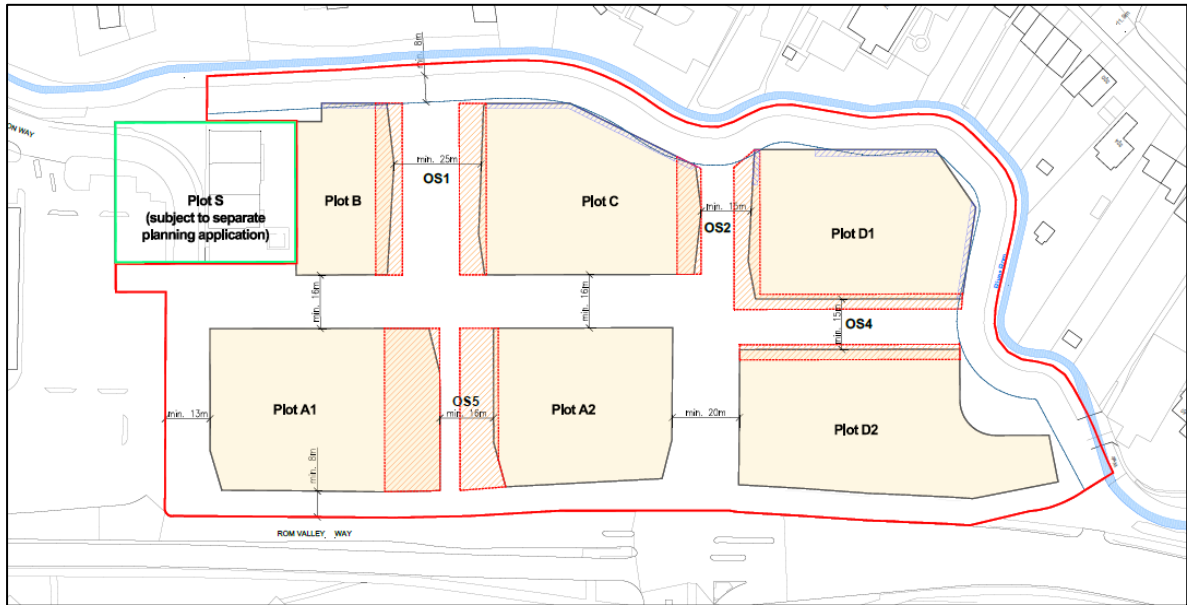


Fig 1: Development Plot Plan

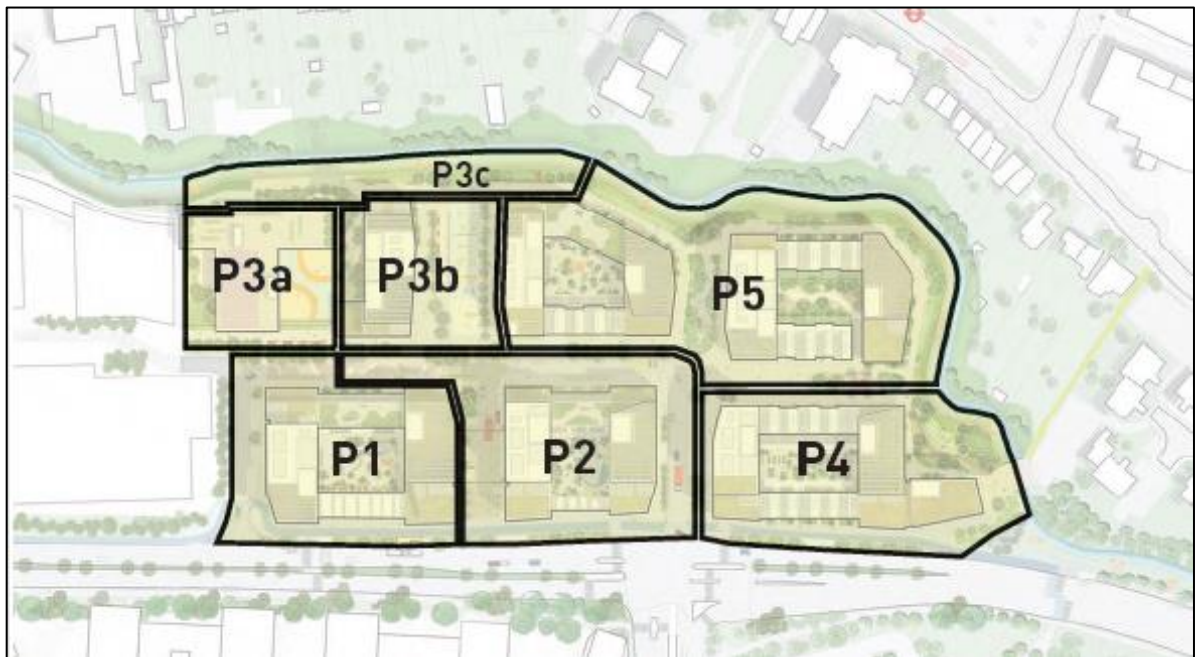


Fig 2: Indicative phasing plan

5.0 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:

- P0891.87 – Outline application for the development of part for residential purposes and the remainder for non-food retail warehousing together with ancillary car parking and servicing. Approved 23rd September 1987.

- E0031.18 – Certificate of Lawfulness for the existing use of eight units as light industrial (Class B1c). Approved 12th December 2018.
- E0030.18 - Certificate of Lawfulness for the existing use of eight units as Office (Class B1a). Approved 12th December 2018.
- P1226.20 – Outline planning application incorporating details of access to the site and with all other matters reserved for a comprehensive phased mixed-use development as set out in the Development Specification (August 2020) comprising demolition of existing buildings and structures and redevelopment of the site for a mix of uses comprising business and employment uses, (within Use Classes B1(a), B1(b), B1(c) up to 7,804sqm); residential dwellings (within Use Class C3 up to 1,072 units); energy centre (Sui Generis use up to 801sqm); retail and restaurant uses (within Use Classes A1, A2 and A3 up to 339sqm); community uses (Use Class D1); health centre (Use Class D1 up to 1,761sqm); together with public open space including the provision of a riverside walkway; inclusion of basement space, storage; associated car and cycle parking; alteration of existing pedestrian and vehicular access and means of access and circulation within the site; together with new private and public open space and site preparation works. Application withdrawn May 2021.
- P1882.21 - Temporary Change of Use from Use Class E (Retail) to Use Class E (Food Shop) for a period of 7 years (Revised Description). Approved 15 December 2021.

Pre-Application Discussion

- 5.2 Prior to the submission of this planning application, the applicant has engaged with LBH planning and design officers over 2 years. The applicant has entered into a Planning Performance Agreement (PPA) with the Council to formalise the pre-application stage of engagement in respect of the proposals. Pre-application discussions have taken place with Council officers, TfL, the Greater London Authority (GLA) and other statutory consultees under the terms of the PPA.
- 5.3 The development falls within the thresholds as set out in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, whereby an EIA is required for the purposes of assessing the likely significant environmental effects of the development. A Scoping Opinion was previously issued on the 24th January 2022 which commented on the approach and methodology for assessing the impact of the following environmental topics:
- Transport
 - Air Quality
 - Noise and Vibration
 - Ground Conditions
 - Water
 - Ecology
 - Landscape, Townscape and Visual Amenity
 - Socio-economic
 - Archaeology
 - Waste Management; and
 - Climate Change and renewable Energy
- 5.4 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 reviews by the Quality Review Panel. Officers expressed throughout the pre-application process that the layout arrangement, quantum and quality of the development, detail of the improvement / naturalisation of the River Rom, improvement, creation and integration of access routes will carry significant weight in the determination of an acceptable proposal.

- 5.5 The proposals have evolved considerably since first being presented to the QRP. A number of positive changes to the overall masterplan concept have been incorporated into the final scheme - a number of elements relating to the proposal 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 have been made.

Summary of QRP Comments and Officer Comments – 15 February 2022	
QRP Comment	Officer Comments
The panel would like to understand the fundamental design moves that will inform the design code and parameter plans, to ensure that this becomes a good place to live and to work. In particular, more work is required to refine the arrangement of spaces and buildings, with a clearer hierarchy evident and a more disciplined approach would enable the site to accommodate the complexity of access and servicing required for the diverse uses.	The applicant has detailed that multiple option studies were presented in the first two pre-app meetings, leading to a preferred option. Overall quantum has also been revised down as design solutions interrogated further. Distribution of ground floor uses was reviewed to cluster uses and provide stronger local character.
The panel has some concerns about the proposed massing, and feels that tall buildings here would require further justification. As a peri-urban site, the scheme has an important role to play in managing the transition from the town centre into the suburban hinterland. The massing could also benefit from being redistributed, with height focused on Rom Valley Way and a more relaxed relationship to the Rom. The impact of the massing on the quality of public realm also needs particular attention. The panel also questions the proposed typologies, and notes that the prevalence of podium blocks suggests a more urban scheme than the site merits.	The initial options presented to LBH included two buildings at 14 storeys and these were reduced to 12 storeys. The overall number of buildings taller than 9 storeys have also been reduced. The quality of the public realm will be aided by the palette of materials to be used. As this is an outline application, details of materials will be secured by conditions and further detailed / confirmed in subsequent reserved matters applications.
The aspirations for sustainability are to be welcomed, but these should be set out in specific and quantifiable targets, which can inform the fundamental design principles.	A suite of technical reports has been submitted, and subsequently updated for the December 2022 submission, which demonstrate the scheme's proposed high environmental performance.
Response to Context	

<p>The panel welcomes the analysis that the team has undertaken of the local context and architectural character. However, it notes that many of the precedents shown are urban in nature, and not reflective of the scheme's peri-urban setting.</p>	<p>The scale of buildings and particularly those to the south was revised in later iterations of the masterplan to better respond to context.</p>
<p>The panel welcomes the inclusion of visualisations of the scheme within its context, but would like to see additional long views to illustrate how the scheme sits within the townscape.</p>	<p>Additional views have been produced to address this.</p>
<p>Scale, Massing and Heights</p>	
<p>The scheme is very dense, and the panel is not yet convinced that the massing sits comfortably within its context or provides an effective transition from the town centre to the suburban housing to the south and east.</p>	<p>The overall quantum has reduced from 1,072 residential units (previous application Ref: P1226.20) to a maximum of 840 residential units. The scheme provides high quality public realm and amenity space which is demonstrated in the in the accompanying DAS.</p>
<p>The aspirations for sustainability are to be welcomed, but these should be set out in specific and quantifiable targets, which can inform the fundamental design principles.</p>	<p>A suite of technical reports has been submitted, and subsequently updated for the December 2022 submission, which demonstrate the scheme's proposed high environmental performance.</p>
<p>The panel questions whether the quantum of development proposed can generate a high-quality living and working environment, given the potential compromises that may be required on internal and external environmental performance.</p>	<p>The overall quantum has reduced from 1,072 residential units (previous application Ref: P1226.20) to a maximum of 840 residential units. The scheme provides high quality public realm and amenity space which is demonstrated in the in the accompanying DAS.</p>
<p>The panel feels that the proposed heights (across the site) have not yet been fully justified. Additional work is required to demonstrate that the building heights do not have an adverse impact on the site's immediate and wider context.</p>	<p>Buildings at 12 storeys have been set back from Rom Valley Way towards the inner part of the site, with the exception of the 'marker' building. Buildings next to the school and to the main open space were reduced to 8 storeys.</p>
<p>The panel questions the impact of the heights and massing on the public realm and adjacent amenity space. It would like to see evidence that these are not impaired by overshadowing and microclimate effects.</p>	<p>The application is accompanied by a Daylight and Sunlight Report and The Environmental Statement includes information on microclimate effects.</p>
<p>The articulation of the massing lacks clarity and creates some jarring interfaces in section. The panel suggests that a redistribution of the massing, focusing height to the north of the site and fronting onto Rom Valley Way, would enable a smoother transition from the town centre and create more a comfortable relationship with the public space along the Rom.</p>	<p>An 8 storey 'shoulder' height along Rom Valley Way was introduced in response to the height of the consented Ice Rink scheme, leaving one 12 storey building on this road, which is seen as a 'marker' building. Similarly, a 6 storey 'shoulder' was introduced towards the internal street and the River Rom and a number of townhouses were introduced in the two blocks to the south, to provide a transition to the lower scale housing in this location.</p>

Layout, Movement and Servicing	
Rom Valley Way is a very busy road and, as a major route, it will continue to be so even with the public realm improvements proposed. The scheme will need to function comfortably within those constraints, particularly in relation to safety of movement; dialogue with TfL on transport capacity will be essential.	Detailed traffic modelling was undertaken and included as part of the application to establish necessary works required to the existing signalised junction and pedestrian and footpath routes so that there is no negative impacts.
The proposed east-west permeability is a positive feature of the scheme, but the panel urges the design team to think carefully about connections into the wider area, giving proper consideration to onward routes and to the safety of movement beyond the red line, particularly in relation to Rom Valley Way.	The permeability have been substantially enhanced. Officer are satisfied with the improvements proposed. North south connections along Rom Valley Way are improved for pedestrians and cyclists, as well as routes within the site. A potential future east west connection towards south street has also been set out.
The panel feels that the makers' yard is in the right place, but notes that only six of the commercial units front directly onto it. It is not convinced that this will enable an effective servicing and access strategy, and fears that tenants will simply occupy the space outside their unit, not least for parking.	The ground floor was reviewed and additional tracking was undertaken to include a servicing route through the podiums of all blocks which accommodate workspace. Podium floor to floor heights were increased from 4,5m to 5,5m to allow for small trucks access within the podium loading bays.
The panel strongly supports the intention use underground refuse storage, but the detail of its design, location and servicing will be critical. In particular, the panel feels that the stores should be serviced from the central spine, not the secondary streets.	URS has been tested and shown in illustrative plans as well as further explained in the Waste Management Plan. Due to challenges around access and maximum travel distances required, a portion of the building cores will need to rely on facilities management in addition to the URS. Lay-bays along Rom Valley Way were removed and therefore cores of buildings fronting on to this road will require facilities management.
Locating entrances to the undercroft parking on the secondary streets severely compromises the proposed pocket parks, and the panel would rather access was from the central spine of the development.	All buildings front on this street, providing active ground floors with a continuous and robust public realm including pedestrian footway, significant landscape and a dedicated cycle path which is in line with Liveable Neighbourhoods and Urban Movement Study.
While supportive of the ambition for a car-free development, the panel notes that space will be needed for deliveries and, given the suburban location, potentially for a car club.	It is considered that an appropriate number of spaces and drop off areas have been provided within the scheme with 44 spaces (26 residential, 17 industrial and 1 car club). A management company will be used to ensure that the correct parking within the site is enforced.
Residential Typologies and Quality of Accommodation	
The introduction of diverse housing typologies is welcome, particularly the family housing, and the panel urges the design team to seek to increase this diversity where possible.	The masterplan include ground floor maisonettes sitting below apartment buildings and these would be particularly suitable for families. Later iterations of the scheme also introduced a number of townhouses towards the southern end of the site, to provide an even wider range of residential

	typologies and to respond to the residential setting and lower scale in this location.
The panel feels that some of the units indicated as are in fact single aspect. Alternative typologies, or the introduction of deck access, could be considered in order to reduce the number of single aspect dwellings provided.	The buildings have be redesigned to deliver an increased amount of dual aspect units - the proportion of dual aspect units has been increased with a target to achieve a minimum of 65% dual aspect units across the scheme, and single aspect North West facing units minimised. This helps to achieve adequate daylight and natural ventilation to the majority of dwellings. This level is considered reasonable in the context of the site. Officers will continue to improve on this as part of the reserved matters.
The panel feels that it is inappropriate to locate townhouse or maisonette typologies fronting onto Rom Valley Way, given scale and access issues.	Further articulation of massing and additional typologies of homes were introduced (such as deck access flats) in order to increase the number of dual aspect units. Potential for maisonettes and townhouses was maximised, particularly along the River Rom frontage and to the south of the site.
Public Realm and Landscape	
Given the proposed density and range of uses on the site, the public realm will have to work very hard. A clearer hierarchy for the spaces needs to be defined, and this should be captured in the design code.	This was taken on board by the design team and the open space to the north-east of the site has been increased in size and now accommodates the majority of play space requirements for the site. The character of each of the spaces had also been developed, having a Local Park, a Forest Park and an Ecology Park, along the River Rom.
The panel notes that the Rom is a key asset of the site and it is encouraged by the intention to step down to the river. It would like to see further opportunities for doing so explored, with the landscape design drawing the greenery along the Rom into the scheme.	The River Rom restoration has been a central part of the vision for this site, which has the opportunity to bring forward approximately 400m long river edge, within the longer corridor which stretches from the Bridge Close site and leads on to Grenfell Park to the south, making it one continuous river amenity with proposed routes for pedestrians and cyclists. Close engagement with the EA (EA pre-app) has been undertaken to establish the validity of the landscape proposals and to consider in detail the agency's maintenance access requirements to the river. Conclusions from this engagement have been integrated into the proposals and fully documented.
The panel would like to see an analysis of the existing vegetation along the River Rom, with as many of the trees as possible retained.	The existing stock of trees and retained groups have been highlighted in the parameter plans and included in landscape proposals.
The panel feels that the river side space could be more generous towards the north of the site, given the heights of the adjacent buildings. Detailed sections,	An updated technical note has been produce with close liaison with the EA (through their pre-app process). This details a stepped access with

<p>illustrating how the buildings relate to the river and the landscape along it, will be critical to understanding the likely success of the scheme.</p>	<p>increased naturalisation of the River Rom. The EA has raised no objection to the application.</p>
<p>The public realm is currently fragmented and is also likely to be compromised by vehicle movements and servicing. The panel would therefore like to see options explored for consolidating the public realm into a single, meaningful space.</p>	<p>The River Rom restoration has been a central part of the vision for this site, which has the opportunity to bring forward approximately 400m long river edge, within the longer corridor which stretches from the Bridge Close site and leads on to Grenfell Park to the south, really making it one continuous river amenity with excellent routes for pedestrians and cyclists.</p>
<p>Careful landscape design and planting will be necessary if the makers' yard is not simply to become a car park.</p>	<p>The Makers' yard landscape proposals have been progressed to build on its function as a working hub, providing enough hardscape as necessary but also introducing greenery. The ground floor layout was updated to suggest larger units where access to the yard is direct. Options for different sizes of units and different strategies for allocation were added to the Design Code.</p>
<p>The panel notes that the podium courtyards appear to be relatively small and overshadowed, and this may require further thought as the design progresses.</p>	<p>The blocks towards Rom Valley Way have stacked workspace units and/or articulated roofs to the south of the courtyards to create a strong active frontage and provide enclosure to the courtyard space without overshadowing it. The most southern block has a maisonettes accessed from the courtyard above the ground floor workspace units with the same aim of providing sufficient enclosure and frontage without adding shadow on the residential amenity at podium level.</p>
<p>The panel feels that the proposed central spine has the potential to be successful, but this will depend upon the detail of the landscape design. In particular, the width of the street could be tightened to create a more intimate streetscape.</p>	<p>Key dimensions, materials and other design instructions are 'locked in' for future reserved matters applications through the Parameter Plans and the Design Code.</p>
<p>The panel notes that this central spine suggests the extension of a continuous route from the town centre, through Bridge Close and the Homebase site. However, its termination at the southern end of this site is not recognised and the panel asks that the design team give some thought to how this could be made more meaningful.</p>	<p>Further detail was added to the landscape proposals and captured in the Landscape Design and Access Statement. Also, key dimensions, materials and other design instructions are 'locked in' for future reserved matters applications through the Parameter Plans and the Design Code. The enhancements to the River Rom have been designed so a seamless link can be made with the adjacent plots of land.</p>
<p>The panel notes that the massing meets the requirements for sunlight in external space, but would like to see further detail, at different times of the year and of the day, to ensure that specific uses, such as play, are located in the most appropriate places.</p>	<p>An updated daylight / sunlight study is included within the supporting documentation.</p>

Much greater detail is required on the approach to play provision within the scheme, demonstrating a clear understanding of how this will complement the play offer in the wider area. Crucially the outline application must demonstrate the achievability and quality of these spaces relative to the amount of development proposed.	The design team have worked closely with GIA, testing the scheme and producing iterative design options to make sure all open spaces pass minimum BRE standards, noting that achieving those standards for a couple of public open spaces is challenging.
Sustainability and Carbon	
The panel welcomes the aspirations for environmental performance but would prefer to see specific and quantifiable targets, particularly for energy and carbon, to inform the key design decisions and to make sustainability integral to the scheme. An energy strategy should be developed to ensure that the low-carbon ambitions that have been set out are delivered in practice.	Details are included within various submission documents and the Design Code. Details will be confirmed via conditions and future reserved matters applications. There is also a Carbon Off-setting contribution required.

5.6 Following previous Pre-App and QRP comments, the design team attended a series of workshops / meetings 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 at this stage, which integrates appropriately within the surrounding context.

Summary of SPC Comments and Response from Applicant – 21 July 2022		
SPC Comment	Applicant Response	Officer Remark
Further details about future car parking provision and details of priority justification of uses on site. Car parking in general and will increased parking impact other streets.	A total of 44 car parking spaces will be provided. This will include 26 resident blue badge holder bays and 17 employment bays (incl. 1 disabled bay). The scheme will also have a Car Club space. The proposals reflect the council's Strategy & Concept Design for Rom Valley Way and are supported by the GLA. Active travel (walking and cycling) will be promoted, and a Car Club space will be provided. In accordance with the London Plan, blue badge parking will be provided for residents at 3% (26), whilst 5% (1) of the workplace parking will also be for disabled use.	The development has been developed as a car free / car minimum 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.
Impact on local roads	An assessment of impact from the development on the surrounding transport network has been undertaken, and it will result in a reduction in the number of vehicle	Both TfL and the Highways Authority have no fundamental objection to the proposal. All highways mitigation measure

	trips that will benefit the local road network, and the hospital.	are secured by S106 legal agreement and conditions.
Provision for charging points – Electric vehicle	All parking spaces will have electric charging points, despite the London Plan only requiring a minimum of 20%.	This exceeds policy and is compliant.
Affordable housing - 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 – further information was requested	A 11% (by habitable room) affordable housing has been offered which is split between 70% Social Rent 30% Intermediate. Of the social rent 10% will be for 1 Bed 2P, 40% will be for 2 Bed 4P, 40% will be for 3 Bed 6P and 10% will be for 4 Bed 6P.	The offer for 11% affordable housing on the basis of a 70% split for social rent would secure the most number of affordable units at a mix which best meets the Council's identified housing need.
Family housing provision – is it enough	The mix of private units would predominantly be within the smaller units (1 – 2 bedrooled), however, given the viability constraints of the scheme the mix has been adjusted to include a greater proportion of family units.	The mix of private and affordable units would have to be carefully balanced in the round of the application.
Protection of industrial / manufacturing heritage	The Seedbed scheme has been designed to provide continuity to the existing businesses on the site. The new commercial space includes 5.5m floor to ceiling accommodation with roller shutter doors and 3 phase electricity, where needed. It is serviced by 16m deep yard space. It is not designed as office space.	A plan has been submitted which shows the industrial units which feature mezzanine area, which accounts for 23% of the total industrial floor space. The phasing has been amended to allow there to a minimum of 3,000 sqm of industrial floorspace on site at all times throughout the development.
Further information for relief for existing businesses	There is an ongoing dialogue with the current tenants regarding the plans and how they can be re-housed within the new commercial space that is proposed. All the existing industrial floorspace is being re-provided, plus some additional space. As above, the proposed phasing will allow businesses to be re-housed without having to find interim accommodation.	The applicant has confirmed that 3,000 sqm of industrial floorspace will be available at all times for allow re-housing of existing businesses. The mechanism(s) for retaining current businesses would be secured by a suitable planning condition.
Justification of approach with the height and size of the buildings proposed	The proposed building heights range from 3-12 storeys. Since we	The height, massing scale as contained in the Parameter

	<p>presented the scheme to the SPC, a decision has been made to reduce the height of:</p> <p>The building adjacent to the school reduced by 2 storeys from 10 to 8, with a further reduction to 6 storeys to the part of building closest to the River Rom.</p> <p>The building next to the main open space and adjacent to the River Rom and South Street reduced by 2 storeys from 10 to 8 with a further reduction to 6 storeys to the part of building closest to the River Rom.</p>	<p>Plan have been negotiated with officers.</p>
Increased play spaces and biodiversity	<p>The proposals include a series of ecological enhancements to achieve a positive Biodiversity Net Gain across the site. The scheme has been developed with consideration for achieving Net Zero Carbon in line with London Plan target of 2030. Building designs will reduce the building energy demand, and there will be use of air source heat pumps and solar panels on roofs.</p> <p>Once complete the site will be far greener than it is currently, with an increase in trees and plants and enhancements to the local biodiversity.</p>	<p>The proposal provides policy space requirements for open space. The applicant proposes an uplift in space and this also ensures that the age requirement for play spaces can be achieved within the site.</p> <p>The Design Code now states that 'An overall minimum site area percentage of open space of 26% must be secured, including public realm and streets.'</p>
Commitment for maintenance of public realm and link connection	<p>The Environment Agency will continue to manage the River Rom, as it is a designated major river. The future management company of the wider site will ensure that the area alongside the river will be kept clean and well maintained. The enhancements to the River Rom have been designed so a seamless link can be made with the adjacent plots of land.</p>	<p>An indicative bridge design has been submitted which shows a link can be created to South Street over the River Rom.</p>
Further understanding around deliveries with this being a mixed use site	<p>A Delivery and Servicing Management Plan will assist with the coordination of deliveries at the site for all proposed uses.</p>	<p>DAS shows movements on the western side of the site adjacent Rom Valley Way where there would be a combination of residential, industrial and school servicing would take place. Access routes link parking areas, makers' yard and links to Rom Valley Way where</p>

		new/improved junctions would be secured by condition and s.106 Agreement. A Delivery and Servicing Management Plan can be secured by planning condition.
Air Quality – monitoring possible for pre and post construction	The planning application will be supported by an Air Quality Assessment which will detail the air quality impacts and any required mitigation. The highways and transport assessment shows that the proposals will result in a reduction in the number of vehicle trips, benefitting the local road network, the hospital and air quality. For every tonne of CO2 emissions saved through embodied carbon or emissions reductions during construction £244.63 of social value will be created.	No fundamental objection raised by Environmental Health and conditions have been requested to mitigate an effect on air quality.
Best practice around demolition and best use of materials and recycling	A Construction Management Plan will need to be approved by the Council prior to any works commencing. This will not only address the proposals coming forward on this site, but also the cumulative impact of neighbouring schemes such as the Ice Rink.	Planning conditions relating to demolition and recycling can be secured by planning condition to ensure best practice if followed.
Members would welcome a the provision of a GP surgery	A considerable payment towards improving local infrastructure and services will be made, which will include money towards increasing local health provision. We are currently exploring the potential for the development to support health provision more specifically in the local area.	A contribution to the NHS can be secured by S.106 Agreement which is best mechanism to meet health demand in the area. The NHS have not requested any health provision on site.
Access and improvement to Grenfell Park	The masterplan has a number of places young people can socialise and relax. Grenfell Park and Old Church Park are a short walk away and provide larger open spaces where young people can play sports and get closer to nature. Three additional pedestrian crossings on Rom Valley Way - and the new routes delivered by the proposals - create more direct and safer connections to these spaces. The application	The applicant has during the application process set out that adequate play provision can be achieved on site.

	will be the subject of a significant CIL charge. Some of this money can therefore be used to upgrade facilities at Grenfell Park and/or other local parks and open spaces.	
Timing of construction in relation to other schemes	As above, a CEMP will need to be approved by the Council prior to any works commencing. The applicant team will work with the Council to agree a Construction Management Plan that prevents unnecessary disruption and ensures residents are not disturbed.	It is agreed that noise, disturbance and affect on the local road network can be appropriately managed through a CEMP secured by planning condition.

- 5.7 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)

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

- 5.9 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 Regulations and detailed consideration of this information is undertaken in the below appraisal sections.

Community and Stakeholder Engagement

- 5.10 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. This included:

- Newsletters (4272 copies of the newsletter were posted to residential properties and businesses) providing information about the proposed development and directions to a dedicated website where they could see more information;
- Emails were sent to local politicians, providing them with details of the proposed development and offering them a virtual presentation of proposals;
- Survey of business tenants on the Romford Seedbed Centre (April 2022);
- Online public consultation (May 2022);
- Physical public exhibition events held at the Seedbed Centre, Romford. 14th May, 10am – 2pm and 16th May, 2pm – 8pm;
- Consultation contact phone number, email address and Freepost address – a way for residents, businesses, and other local stakeholders to raise questions, provide feedback and request more information;
- Hospital trust engagement (June 2022);
- Article in local Romford Recorder, including follow up article post consultation (May and June 2022); and
- Strategic planning committee developer presentation (July 2022).

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

1. Justify the approach in relation to massing

The site presents the opportunity to deliver much needed homes in a sustainable location. The proposed building heights responds to the emerging context of the site such as the consented scheme on the former Ice Rink which will bring forward buildings of up to 12 storeys along Rom Valley Way. It is also in line with initial proposals seen on the Homebase site to the north, which is in pre-application stage, albeit not as progressed. Within the site, we have taken into consideration the existing context towards the east and south and have lower heights to respond to existing properties.

2. Confirmation of heights of the tallest buildings

The proposed building heights range from 3-12 storeys. Since the applicant team presented the scheme to the SPC, a decision has been made to reduce the height of:

- The building adjacent to the school reduced by 2 storeys from 10 to 8, with a further reduction to 6 storeys to the part of building closest to the River Rom; and
- The building next to the main open space and adjacent to the River Rom and South Street reduced by 2 storeys from 10 to 8 with a further reduction to 6 storeys to the part of building closest to the River Rom.

3. Explanation of what impact the proposed buildings will have on nearby residents, including the houses on South Street

The buildings and layout have been designed to ensure that they will have little impact on nearby houses. The distance and site layout will ensure that current residents are not unduly affected by overlooking, daylight/sunlight/shadowing or noise impacts. A full daylight, sunlight and overshadowing assessment has been undertaken by Gordon Ingram Associates. The resulting report confirms that the scheme meets the relevant tests and is policy compliant in relation to the residential properties on South Street, having minor impact on these from a daylight and sunlight perspective.

4. Concern with the impact of parking on nearby streets

As part of the proposed development, a number of measures would be implemented to discourage private vehicle use and encourage sustainable modes of travel. These include:

- The provision of a travel plan
- Parking restrictions & exemption from obtaining a parking permit
- Inclusion of Car Club vehicle
- Disabled use parking only for residents
- Operational parking only for the employment use
- Electric vehicle charging facilities
- Cycle parking and route infrastructure improvements
- Potential new bus stop and pedestrian crossings

Whilst there are already a variety of restrictions (red/yellow line road markings and CPZs) present on the streets surrounding the site, to address and mitigate any potential parking overspill, a contribution towards further consultation/assessment/implementation of a local Controlled Parking Zone could also be considered.

5. Timescales for demolition

Subject to obtaining outline planning consent, the applicant team will be looking to start work in 2024. This will allow time for detailed planning consent to be granted for the first phase.

6. How will the phasing of the development work?

A phasing plan has been prepared to demonstrate how the scheme could come forward. A key focus on this is ensuring that the existing businesses can continue to trade without having to find alternative premises whilst demolition and construction is taking place.

7. How many jobs will be provided directly and indirectly through the development?

Over 4 years of construction the development could support around 550 full time equivalent jobs, with construction creating up to £16.2m of local economic value for the London Borough of Havering. Once built the development has the potential to support around 90 full time equivalent jobs including 45 in the primary school.

8. How is biodiversity being considered?

The proposals include a series of ecological enhancements to achieve a positive Biodiversity Net Gain across the site. The scheme has been developed with consideration for achieving Net Zero Carbon in line with London Plan target of 2030. Building designs will reduce the building energy demand, and there will be use of air source heat pumps and solar panels on roofs. Once complete the site will be far greener than it is currently, with an increase in trees and plants and enhancements to the local biodiversity.

9. What play space is being made available for residents?

The average sqm per home of play space averages out as approximately 4.1m² for each of the new homes. The scheme as submitted provides the following play provision:

- 1,712 m² of 0-4yrs play space
- 1,227 m² of 5-11yrs play space

- 193 m² of 12-18yrs play space

Throughout the site will be a Play Park with play equipment, a Forest Park with natural play features and an Ecology Park where children can play and learn about nature. Other parks within a five-minute walk include Old Church Park, Jubilee Park, and Park Lane Recreation Ground.

10. Will there be 18-24 year olds relax and play?

The masterplan has a number of places young people can socialise and relax. Grenfell Park and Old Church Park are a short walk away and provide larger open spaces where young people can play sports and get closer to nature. Three additional pedestrian crossings on Rom Valley Way - and the new routes delivered by the proposals - create more direct and safer connections to these spaces.

Changes made to the scheme as a result of Public Consultation

- Overall height reduced across scheme
- Break down of the massing
- Creating safer access / links to Grenfell and Old church Park
- A central Park
- Slight increase in Parking

6.0 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 (28-04-22)

6.3 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 is considered to be supported by the GLA subject to a number of matters being resolved:

6.4 The GLA detail:

'The proposed development of the site to demolish the existing industrial and commercial buildings and deliver a mixed-use residential-led development is supported in line with Policies E7, H1 and S3 and Objective GG2 of the London Plan. However, a number of matters require further consideration as raised in this report, including maximising industrial floor space on the site, the school design, the suitability of the site for a tall building, and the proposal following the Viability Tested Route.'

6.5 Re-provision of industrial floor space: in order to meet Policies E4, E6 and E7, the applicant should demonstrate that the scheme is coming forward in accordance with a plan-led approach. In the absence of any site-specific policy relating to this site, to do this, the applicant will need to demonstrate that the proposal meets the requirements of Policy 20 of the Havering Local Plan.

6.6 In terms of quantum of replacement industrial floorspace, London Plan policies also make clear that redevelopment of LSIS to facilitate other uses should only take place in conjunction with an intensification of industrial use to provide additional industrial capacity. Whilst it is

proposed to replace the floorspace of the units currently in industrial use within the LSIS, this does not represent any intensification.

- 6.7 Furthermore, given the new industrial floorspace is proposed to be directly co-located underneath residential uses it would be limited to only very light industrial uses, and thus reduces the notional capacity. In this arrangement, it is considered that a greater amount of floorspace is necessary to demonstrate true intensification. These matters must be further addressed in revised proposals prior to an application being submitted.
- 6.8 Affordable Housing: At the meeting, the applicant indicated that only 20-30% affordable housing would be achievable based on the scheme presented, with the tenure split unclear. This falls significantly short of expectations and would not be supported in principle. Every effort must be made, e.g., through optimising the design of the scheme and also exploring grant funding, to increase the level of affordable housing that could be delivered on the site. If a threshold level of affordable housing is not achieved, then the application would have to follow the Viability Tested Route, and GLA officers would robustly scrutinise the applicant's viability evidence with a view to maximising the affordable housing delivery.
- 6.9 Tall buildings: As the Romford Masterplan has not yet been published, or any development plan document that designates the site as being potentially suitable for tall buildings, there is currently a potential conflict with Policy D9.
- 6.10 Visual Impacts: there are concerns over the potential monotony of the continual street wall height and whether greater variation should be introduced. Further streetscape testing should be undertaken and consider dynamic viewpoints at different viewing points along Rom Valley Way. Townscape studies and solar testing should continue to be undertaken to inform the development of the spaces fronting the internal spine road. Daylight, sunlight, and visual impact testing on the River Rom and surrounding private amenity spaces should be reviewed.
- 6.11 There is limited height variation between the two 10 storey buildings adjacent to the school. There may be an opportunity to reconfigure this part of the masterplan to co-locate the main open space with the school.
- 6.12 The southern end of the site is in a key location that marks the start of the increased density as taller buildings which continue as one moves north. The six-storey element in this location currently has a slightly awkward geometry which creates a suboptimal ground condition with a poor relationship between the proposed ground floor uses, the bridge and the open space.
- 6.13 Given its prevalence on Rom Valley Way when travelling from the south, there is an opportunity for a building in this location to become a local landmark. This may also bring floorspace "breathing room" to allow some of the other buildings to reduce in height slightly. Given this is expected to be an outline application, the future design code is of paramount importance.
- 6.14 Environmental Impacts: Presentation of relevant sunlight and daylight analysis should be undertaken on the proposals as well as the surrounding context and used as a design tool rather than final assessment method. Shadow studies should help to demonstrate conditions at the winter solstice (when the sun is lowest in the sky) which represents the 'worst case' solar access scenario. Following this, detailed solar insolation assessment in line with BRE guidance / British Standards should be undertaken. Year-round improvements to maximise direct sunlight, particularly in the winter months, are paramount to ensuring their continual year-round use.

- 6.15 Given the height of the building, the applicant will need to carry out wind microclimate assessment to avoid any tunnelling effect between the buildings and not the open space at ground floor level.
- 6.16 Riverside Route: The alignment of the route merely seems to run parallel to the built form, with little reference to place. There is an opportunity to provide a more organic and natural route that follows the meanders of the river.
- 6.17 Further information on any engagement with the Environment Agency should be provided. Officers query whether engagement with the Canal and River Trust has been undertaken.
- 6.18 A new connection across the river would bring notable strategic benefit, for example accessed from The Maltings. This would help improve the connection between the employment spaces and school to the surrounding residential areas.
- 6.19 Industrial Floorspace: Further engagement with prospective tenants should continue. Officers query whether a more appropriate approach might be to simplify the industrial provision and access by providing an internalised route which provides direct vehicular access to the rear of each of the industrial tenancies. It is noted this would reduce the size of the Makers Yard, but this would allow for additional green infrastructure / open space for residents.
- 6.20 Visual Impacts: It is understood there is an intention to create a layered approach to the streetscape with the 8 storey shoulder elements fronting Rom Valley Way. However, there are concerns over the potential monotony of the continual street wall height and whether greater variation should be introduced. Further streetscape testing should be undertaken and consider dynamic viewpoints at different viewing points along Rom Valley Way.
- 6.21 Fire Safety: In line with Policy D12 of the London Plan the future application should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.
- 6.22 Further to the above, Policy D5 within the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings.
- 6.23 Transport: All highway works including any crossings proposed must be accompanied at application stage by a Stage 1 Road Safety Audit (RSA) and any signal changes pre-assessed by the TfL Signals team. TfL expressed concern about the inadequate modelling for the previous application (and this was related to one of the Council's resolved reasons for refusal); the applicant has applied for a TfL pre-application meeting which should enable modelling to be undertaken in line with TfL requirements.
- 6.24 Sustainability: The applicant should submit a whole life-cycle carbon assessment to the GLA as part of any planning application submission, following the Whole Life-Cycle Carbon Assessment Guidance and using the GLA's reporting template. The applicant will also be conditioned to submit a post-construction assessment to report on the development's actual WLC emissions.
- 6.25 The number of matters that require further consideration include the suitability of the site for a tall building, and the proposal following the Viability Tested Route. The future application

will need to address the issues raised in this report with respect to **urban design, affordable housing, fire safety, transport, and sustainability.**

6.26 Recommendation: the application is supported but there are a few remaining issues that require further consideration.

Transport for London (TfL)

- The applicant should clarify the width of the new footway it is intending to provide along the south of its RVW frontage, where there is no footway currently.
- TfL seeks further detail, including more explicit connections to link with the cycle network now and for the future. It supports the Council in progressing these important mitigations in conjunction with its own plans to improve walking and cycling opportunities in Romford Town Centre especially through its Movement Strategy. The applicant proposes two additional pedestrian/cyclist crossings across Rom Valley Way which it says will align with the latter's intended aims.
- It cannot be assumed that there would be no car driver trips from the housing and clarification is sought.
- TfL Signals team will need to be consulted at the next stage. The development on the Former Ice Rink site on the opposite side of Rom Valley Way would provide SCOOT loops under the carriageway to further aid the flow of traffic at a future point when the Council will be leading a redesign of the junction.
- The highway proposals for the scheme include for a segregated footway/cycleway along the eastern side of Rom Valley Way and two further standalone signal-controlled pedestrian and cycle crossings. TfL seeks to discuss further the validation of the modelling outputs undertaken in support of these changes with the applicant, and to better understand the healthy streets benefits before it can conclusively comment.
- To ensure future road safety, the design for highway and road safety improvements has been adjusted acceptably to accord with the recommendations in a 2022 Revised Stage 1 Road Safety Audit. The additional lay-by on RVW that TfL raised concerns about at pre-application stage have been removed from the design. Highway improvements will be secured through a s278 agreement with the Local Authority.
- TfL notes the plans for the new bus stop are illustrative and to be clear, TfL's position for the foreseeable future is that, if provided, the stop would not be used by bus services.
- The proposed cycle parking quantum (1,550 spaces) exceeds the minimum London Plan quantum requirements but there is insufficient demonstration that qualitative LCDS standards as also required by London Plan Policy T5 have been met across all land uses, or that an excellent arrival experience and safety features for design/use of cycle storage have been provided. There is no mention in the TA of end-of-journey facilities (showers etc) nor of the minimum 5% spaces required to be oversized for adapted and cargo bikes. Whilst this is an Outline planning application, cycling detailing is sought at this stage because a condition is insufficient to ensure sufficient space has been designed in, as this is difficult to alter at a later stage. Pending further information and discussion, TfL is not able to support the cycle storage provision.
- TfL considers the highly accessible location of the Site would support zero commercial spaces (excepting Blue Badge), given they will encourage unsustainable commuting patterns. TfL seeks further justification against policy and clarification on any proposed operational parking.
- The applicant should contribute to implementing a CPZ in the area, to support the necessary legal agreement to restrict future residents from obtaining on-street parking permits and the framework Car and Cycle Parking Management Plan (CCPMP) provided secured by condition for approval of detail.

- EVCP would be provided to meet London Plan standards. However, given the small number of spaces and especially those for disabled persons, we encourage that all have active facilities from the outset. Any operational parking should have rapid charging.
- Residential refuse will be collected from within the Site via an underground refuse system, further detail to demonstrate the safety and convenience of pedestrians and other road users is maintained will be submitted as Reserved Matters.
- A TP for each of the uses, CMP and DSP should be appropriately secured and should coordinate with those for the adjacent school development.

TfL conclude that the applicant has achieved an improved design and very low car development which will re-balance the environment away from car domination. Cycle parking is not demonstrably designed to meet policy. Improvements within the wider area need further work coordination with other developments in the area (notably the adjacent school proposal), A commitment and liaison with the Council which has its own plans, will be necessary.

Officer comment: The RVW footway is outside the red line boundary and not within the scope of the project. However, improved pedestrian crossings and cycle provision linked to proposals will help to create a more accessible pedestrian network. There are connections to link with the cycle network which achieve the aim of improving walking and cycling opportunities in Romford Town Centre especially through its Movement Strategy, The LPA does not necessarily agree with zero parking for commercial space as some commercial provision would help retain existing businesses.

LBH Education

- 6.27 This proposed development is expected to generate 138 early years children places. The Havering Childcare Sufficiency Report 2023 – 2027, states that there is sufficient early years places available in this ward.
- 6.28 The proposal will generate 136 primary aged children. We are projecting a deficit of school places in Romford areas from 2023/24. We therefore seek financial contribution towards the cost of creating the additional school places required as a result of this housing development.
- 6.29 The proposal is expected to generate 38 secondary aged children. There is a projecting deficit of school places in the Central planning area from 2026/27 onwards.
- 6.30 Therefore, a financial contribution towards the cost of creating the additional school places is required as a result of this housing development. There is sufficient post 16 places available in Havering.
- 6.31 In summary, the proposed housing will generate an additional, 136 primary aged children and 38 secondary aged children in an area where we are projecting a deficit of places.
- 6.32 Therefore financial contributions towards the cost of creating additional primary and secondary places are required to meet expected demand from the new housing as follows:

Phase	Child Yield	Cost per place	Total contribution
Primary	136	£18,114	£2,463,504
Secondary	38	£23,548	£894,824
Total			£3,358,328

Officer comment: Attention to drawn to the heads of terms where this application is linked to P2071.22 which is for outline consent for the erection of a two form entry primary school which would meet the education shortfall. The remainder of a shortfall would be fulfilled by CIL.

6.33 **LBH Highways** - No fundamental objection. Consider the use of URS in a future scheme, demonstrate how the school will be serviced. Web-based Connectivity Assessment Toolkit indicates that the public transport accessibility level (PTAL) is rated as 6a, which is considered to be excellent. The pedestrian network and the cycle accessibility through the site has been improved greatly and therefore, it is a welcome improvement. Trees along the highway on footways gives a perceive narrowing of the carriageway. This would also help create a perception of a cooler street. The inclusion of the trees to reduce speeds, is welcomed.

6.34 **LBH Environment Health – (Noise)** Havering have considered the noise report submitted in support of the above application, recommends conditions to be attached and enforced.

Officer comment: Noted and appropriate condition and informatives recommended

6.35 **LBH Environment Health – (Contamination)** Recommend standard contaminated land as a precautionary conditions should approval be granted.

6.36 **LBH Environment Health – (Air Quality)** - 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.

6.37 **Place Services (Ecology)** – We are satisfied that there is sufficient ecological information available for determination of this application. No fundamental to the proposal subject to applicable conditions.

Officer comment: Noted and appropriate condition and informatives suggested.

6.38 **LBH Landscaping** – Havering are satisfied that the proposed level of tree planting, 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 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.

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

6.40 **LBH Waste Management** – The waste refuse and recycling arrangements are acceptable in principle, however, there will need to be staff onsite to transfer waste from bin stores to URS. It is noted they are planning ahead for food waste collections but there is no current process in place for a food waste collection service. Although this is being considered it is some time off of a system being place. With URS collections it is vital that the vehicle has full access to the site so that the vehicle can pull up alongside the URS with stabiliser legs extended so the collection can take place. Parking restrictions will need to be in place. LBH only collect residential waste so we do not provide commercial waste collections

Officer comment: Noted and appropriate condition and informatives suggested.

- 6.41 **NHS (CCG)** – The HUDU Planning Obligations Model has been used 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 £2,913,731. The NHS confirmed that no medical space is required on site.
- 6.42 **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 that the presence of apparatus, we will not take any further.
- 6.43 **London Fire Brigade (Water Officer)** – confirm that no additional fire hydrants are required and no further action is required by our office. We are happy for the works at this site to go ahead as planned.
- 6.44 **Environment Agency** – Pre-app discussions / direct engagement with the applicant have been on-going and as result no objection has been raised to the scheme subject to conditions securing a buffer alongside the River Rom, submission of a landscape and ecological management plan, submission of detailed bridge design and method statement encompassing all proposed works to the Rom water course and buffer zone.

Officer comment: Noted and appropriate condition and informatives suggested

6.45 **Thames Water**

Waste – There are public sewers crossing or close to the development. The proposed development is located within 15m of a strategic sewer. Request a condition to be added to any planning permission in relation to piling.

The site is also affected by wayleaves and easements within the boundary of or close to the application site. Thames Water will seek assurances that these will not be affected by the proposed development. The applicant should undertake appropriate searches to confirm this.

Combined Waste Water - Thames Water have no objection based on the information provided.

Foul Water - Thames Water have no objection based on the information provided.

Surface Water - No objection based on the information provided that surface water will not be discharged to the public network.

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

- 6.46 **Designing Out Crime Officer** – No fundamental objection subject to conditions.
- 6.47 **Historic England (GLAAS)** – Site is located within an area of archaeological interest (Archaeological Priority Area) as identified in the Local Plan (76310 - Oldchurch). Recommend Archaeological Conditions, a two stage approach that could provide an

acceptable safeguard. This comprises firstly evaluation to clarify the nature and extent of surviving remains followed by, if necessary by a full investigation.

Officer comment: Noted and appropriate condition and informatives suggested.

- 6.48 **HSE** - Insufficient fire safety information available in relation to the outline planning application. HSE unable to comment in full on the outline application. Recommend that should the LPA be minded to grant permission for the hybrid application that they strongly recommend the following:
- The planning permission is subject to a suitable condition requiring the submission of a satisfactory fire statement with any reserved matters application; and
 - That HSE (Planning Gateway One) is consulted in conjunction with the Local Planning Authority's consideration of any reserved matters application.
- 6.49 HSE detailed in an email dated 28th June 2023 that they confirmed that they have read the fire strategy document was reviewed and that there was no fire statement but due to it being an outline application then a fire statement was not required.

7.0 LOCAL REPRESENTATION

- 7.1 The application was advertised via a Press Notice and Site Notice displayed at the site for 21 days.
- 7.2 A total of 188 notification letters were sent to neighbouring properties regarding this application.
- 7.3 17 neighbour representations (3 support and 14 objection) have been received via the Council's consultation process.

Representations

- 7.4 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

- A great looking scheme for much needed housing
- Due to overpopulation people are struggling to be homed
- Add value to the local community and economy
- Support provision of more new homes; will improve the area.
- Will help to address housing shortages and affordability, providing more options for people looking to buy or rent a home.
- It is too hard for any young people for affordable homes in Havering.
- Havering currently has a shortage of housing to meet the needs of the population which has caused a large rise in the house prices in the area.
- Romford is also a growing area within Greater London and an increase in the population will lead to an increase in demand for goods and services supporting local businesses.
- This scheme will potentially have a great social as well as environmental impact upon this area concerned
- Generally in favour of the local school and its position within the development.
- Generally in favour of keeping some of the site as open space and inserting more trees and plants to soften the site. More trees should be planted to screen South Street to enable more privacy.

Objection

- Area too overcrowded and overpopulated
- Negative impact to public services - the more we build the less access to schools, doctors, hospitals. Too many "homes" and not enough infrastructure to support it.
- Increase in traffic being detrimental to hospital with ambulances getting stuck in traffic.
- The high rise will take out natural sunlight from gardens on South Street and some adjacent apartments.
- Excessive density; overdevelopment of site
- Proposal will add to the congestion in the area
- Concerned about the modular build design
- 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.
- Poorly designed development with a lack of open space
- Poor circulation within the public realm
- Scale, bulk Scale, bulk and general vast size of this development needs to be scaled back.
- Plans are far too intrusive and invasive to nearby properties and will impact way of living.
- Plans are overly aggressive in scale and will have a large detrimental impact on quality of life living conditions - this would also not just be me but the entire South Street residential houses.
- Concerned regarding privacy. Currently there are no overlooking properties to the rear of our property, and this would instantly change. A bedroom is situated in the rear of the property and we will find relaxing in our garden space more difficult due to the potential for being overlooked and increased noise levels.
- Something of this size, with resident balconies and a structure of such vastness that it is completely out of scale to the immediate surrounding properties along the South Street side.
- Domination of the skyline along the entire length of South Street, and on the ring road of Thurloe Gardens, Oldchurch Road and Rom Valley Way.
- Its presence and the activities that it will allow (new residences go about their lives, more traffic, increased noise etc) will have the side effect of affecting the quality of life of those existing residences neighbouring the site along South Street.
- Sunlight and shadowing some properties will be severely impacted (not only my garden), but also potentially inside my home, especially during the winter months. Block B signifies the school's own bulk and size showing shadowing in red which will in turn reach my property. The block next to it and in front are even larger.
- Impact to views at the rear and impact to heritage along South Street.
- Materials outlined are not in keeping with local architecture.
- Lack of car parking spaces for residential and industrial units proposed - increase to traffic, noise air pollution and illegal parking.
- Impact to biodiversity from gardens along South Street - development limiting wildlife access to South Street. Wildlife impacts to bats and Stag beetles.
- Air, noise and security issues along South Street both during and after construction.
- Number of units high for the area and size of site - number of flats not required, more family homes are needed
- Over development of the town centre

Romford Civic Society –

- In favour of the restoration of the River
- Welcomed and appreciated the engagement with the community and interested groups
- Flooding of the River Rom / location of residential units so close to the river
- Active shop fronts along the River Rom - a missed opportunity for surveillance / security

- Missed chance to create a new public linear park including the River RomThe 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.

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

8.0 Relevant Policies

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

National Planning Policy Framework (2023)

- 8.2 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:

- Chapter 2 - Achieving sustainable development
- Chapter 5 - Delivering a sufficient supply of homes
- Chapter 6 - Building a strong, competitive economy
- Chapter 8 - Promoting healthy and safe communities
- Chapter 9 - Promoting sustainable transport
- Chapter 11 - Making effective use of land
- Chapter 12 - Achieving well-designed places
- Chapter 14 - Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 - Conserving and enhancing the natural environment
- Chapter 16 - Conserving and enhancing the historic 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)

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

- 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)

8.4 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)

- 8.5 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)

- 8.6 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 Design Standards LPG (2023)

- 8.7 The Housing Design Standards guidance provides a set of standards and checklist of London Plan policy requirements for housing grouped under 3 broad headings which reflect the scale they operate at:
- Placemaking and the public realm – the area around the site
 - Shared spaces and ancillary spaces – communal spaces within the site
 - Homes and private outside space – private homes and spaces within the site.

Accessible London SPG

- 8.8 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.
- 8.9 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.

Havering Local Plan (2021)

- 8.10 The following policies should inform design of the proposed development:
- 1 – Romford Strategic Development Area
 - 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
 - 19 - Business Growth (protection of designated Locally Significant industrial Sites)
 - 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)

8.11 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); and
- Planning Obligation (Technical Appendices) (2013).

9.0 MATERIAL PLANNING CONSIDERATIONS

9.1 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
- Retention of Industrial Floorspace / protection of the LSIS Seedbed site.
- Provision of Community Facilities
- 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

Principle of Development

9.2 The application is for the delivery of up to 840 new residential dwellings (Class C3) and a minimum of 3,000sqm industrial floorspace provision is supported as both the wider London and Local Plans support such proposed development given that it is a brownfield site with excellent public transport accessibility that is within close proximity to the metropolitan town centre of Romford and is located within the Romford Strategic Development Area and the London Plan Opportunity Area.

9.3 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.

9.4 The National Planning Policy Framework 2023 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 D3) also states that development should optimise housing output subject to local context and character.

- 9.5 On the 30th May 2022, the Government issued Havering with an updated Housing Delivery Test result for 2021. The update takes account of the adoption of the Havering Local Plan in November 2021 and reflects the stepped housing targets set out with the Plan for the period 2016-2031. The updated Housing Delivery Test Result is 78%. In accordance with the NPPF the "Presumption" due to housing delivery therefore does not apply.
- 9.6 Based on the latest Housing Trajectory (initially published in 2019 and updated in 2023 through the Havering Authority Monitoring Report), Havering cannot currently demonstrate a five year supply of deliverable housing sites. The Havering Local Plan was found sound and adopted in 2021 in the absence of a five year land supply. The Inspector's report concluded:
- "85. Ordinarily, the demonstration of a 5-year supply of deliverable housing land is a prerequisite of a sound plan in terms of the need to deliver a wide choice of homes. However, in the circumstances of this Plan, where the housing requirement has increased at a late stage in the examination, I ultimately conclude that the Plan, as proposed to be modified, is sound in this regard subject to an immediate review.
86. This is a pragmatic approach which is consistent with the findings of the Dacorum judgement. It aims to ensure that an adopted plan is put in place in the interim period before the update is adopted and the 5-year housing land supply situation is established."
- 9.7 The Council is committed to an immediate update of the Local Plan and this is set out in the Council's Local Development Scheme. A full update to the trajectory will be prepared as part of the ongoing work on the Havering Local Plan.
- 9.8 Therefore, in the meantime whilst the position with regard to housing supply is uncertain, consideration has been given to the effect of the tilted balance referred to in Paragraph 11(d) of the NPPF as if the presumption in favour of sustainable development outlined in paragraph 11(d) of the National Planning Policy Framework (NPPF) has been engaged.
- 9.9 Para 11(d) states that where the policies which are most important for determining the proposal are out of date, permission should be granted unless (i) the application of policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development, or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. Fundamentally this means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole. Thus, the proposal for up to 840 units would assist significantly in helping Havering achieve its housing target and is therefore supported.
- 9.10 The proposal also includes a minimum of 3,000sqm of flexible industrial floorspace including 16 with mezzanine areas. 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. The proposal in this regard accords with the aims of Policy 20 of the Local Plan.

- 9.11 The proposal would result in the loss of retail floorspace. However, as the retail units are classified as out of town retail, there is no protection through national, London Plan or Local Plan retail policy which all promote town centre retail.
- 9.12 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 and retains an appropriate provision of industrial floorspace 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.

Standard of Design, Layout, and Impact on Views

- 9.13 The NPPF at paragraph 130 advocates that developments function well and add to the overall quality of the area, be visually attractive, sympathetic to local character and history, establish a strong sense of place and create places that are safe, inclusive and accessible. Paragraph 134 states that 'development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design standards or style guides in plans or supplementary planning documents'. This is reinforced in London Plan Policy GG1, which seeks the involvement of local communities and stakeholders in the planning of large developments.
- 9.14 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.
- 9.15 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.
- 9.16 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.
- 9.17 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..

The Design Response

- 9.18 The outline application is submitted with all matters reserved for future determination; the detailed design, layout 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.

Overview

- 9.19 The proposal has undergone extensive Pre-App and Post-Submission discussion with Officers. The relatively high density of the proposal represented 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), although there are still a number of 12 storey buildings that form a visual mass of taller buildings away from the town centre. To address concerns the scheme took a design-led approach 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 along the River Rom. The resulting scheme comprises six mixed use blocks arranged around a central spine road and park / open space areas that will provide a space for the local community that is sheltered from the activity in the surrounding road network.
- 9.20 The masterplan is organised around the central spine road, helping to improve pedestrian and cycle links in the wider area. The proposed layout helps to create well defined frontages to streets, and allow for more private spaces to residential podium access and balconies.

Appraisal of design approach

- 9.21 The site sits within the Romford Strategic Development Area of the Local Plan, Policy 1. This site has the potential to form a key node in any future pedestrian movement from the station south towards the Former Ice Rink site, Queen's Hospital, the adjacent Homebase site, South Street and along the River Rom. 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.

9.22 The proposal would be contrary to Policy D9 of the London Plan as the site is not currently designated as an area allocated for tall buildings. However, within the context of the site's location within close proximity to the Romford Town Centre and being in the Romford Strategic Development Area and London Plan Opportunity 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.

9.23 In terms of the height Officers raised concerns that further reductions in height to the 3 proposed blocks of 12 storeys sought further reductions to help the scheme to better integrate into the emerging context. However the applicant did not agree and also stated they were unable to accommodate this due to viability issues. In order to help mitigate any negative impacts relating to height, the taller buildings are proposed in least constrained areas of the site, towards the north in closer proximity to Romford town centre, and to the west of the site to Rom Valley Way. Two of the 12 storey blocks step down in height towards the Rom Valley Way which helps to reduce the impact on the street, while lower scale blocks of 2-4 storeys located in between the taller blocks help to break down the overall massing. Given the overall quality of the proposal as set out in the parameters and design code and location on a busy town centre road where change in character is taking place, it is considered that it may be difficult to demonstrate sufficient harm to refuse on the grounds of height of the buildings, although it is recognised that this is a matter that Members could come to a contrary view. There are matters which could outweigh any potential harm relating to the height and massing of the proposal such as substantial public realm upgrades, provision of community and commercial uses alongside housing, and allowance for a future school.

Quality of public realm

9.24 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 of 0.4.

9.25 Additional space given to Rom Valley Way creates the opportunity for pedestrian/cycle improvements and tree planting. This would 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.

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

9.27 Ground floor land uses such as retail units, and restaurants will help activate the public realm.

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

9.28 The proposal aims to achieve a step down in scale from more central sites such as Waterloo Road and Bridge Close. Where taller blocks of 10 and 12 storeys are shown, extensive discussions have taken place to limit the width/bulk to achieve a more elegant silhouette and better integrate with the surroundings. Elsewhere a maximum of 8 storeys to site boundary is generally shown, stepping down to 6 and 3 at more sensitive locations.

Some blocks of 10 storeys are shown where impacts on views and neighbouring sites are minimised.

- 9.29 The use of green landscaping at ground floor and podium level will help soften the appearance of the blocks massing. Building separation when considered with the height and massing provides variation in street hierarchy.

Quality of residential accommodation

- 9.30 The proportion of dual aspect units has been increased with a target to achieve a minimum of 65% dual aspect units across the scheme, and single aspect North West facing units minimised. This helps to achieve adequate daylight and natural ventilation to the majority of dwellings.

- 9.31 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.

Architectural expression

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

- 9.33 The site is of a size and location where it can define its own character. The proposed material choices and finishes shown are considered to provide a high quality appearance contributing to the legibility and appearance of the site. The Design Code has treated the perimeter of the blocks with three settings, an urban, local street and parkland. There are subtle differences between the three typologies which all would contribute towards the different settings across the site and positively contribute to the public realm. The western side facing Rom Valley Way and through part of the interior is within an urban setting where the emphasis is with minimal defensible space providing privacy for individual dwellings and public realm coming up close to the building line. Towards the south within the interior are facing local street typologies with identifiable and varied front doors and side walls demarcating front amenity space. The parkland responds with a more inclusive soft planting to the front of the building edge which faces the River Rom, forest park and intervening open space between plots B and C.

- 9.34 Overall, in terms of detailed architectural design, it is considered that the proposals have been carefully considered and subject to the conditions outlined above, the proposal achieves a design which would be difficult to demonstrate sufficient harm to refuse on the grounds of height of the buildings, however there are elements which serve to enhance the character of the buildings and the surrounding area. Information provided within the design code regarding issues such as the quality of ground floor frontage, the role of set back upper floors, and the angling of frontages helps to secure the quality of the scheme and provide guidance for future reserved matters stages.

- 9.35 Finally, a robust palette of materials is shown, based on a study of the existing materials in and around Romford. These will be confirmed at future reserved matters stages which will ensure an appropriate standard of design across the whole site is maintained.

- 9.36 Other than future confirmation of materials as outlined above, it is considered that a high quality development can be achieved and as such, the height and massing of the scheme would be acceptable.

Residential Amenity

- 9.37 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. It also provides the minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights for all tenures of residential housing.
- 9.38 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.
- 9.39 These requirements are also further elaborated within the Mayor's London Housing Design Standards 2023. 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.
- 9.40 The Building Research Establishment (BRE) guidelines provides a methodology for assessing the vertical sky component and sunlight assessment within habitable rooms to understand the amount of daylight afforded to these spaces. The Vertical Sky Component (VSC) of a window is a measure of the amount of sky that is visible from the vertical centre of the window. To provide a good level of natural daylight the VSC of the main window to a room needs to be no less than 27% and no less than 0.80 times its former value. If the VSC is less than the required 27% then a further comparison of the existing and proposed VSC levels is required.

Future occupiers

- 9.41 In respect of VSC on the basis of the facades of the indicative masterplan the scheme as the actual positioning of the windows at this stage is unknown, shows that the vast majority of the facades would receive a VSC of above 27% in line with the BRE Standards. The other facades are likely to achieve figures below 27% but within acceptable limits for such a development. This is something, which would be assessed at reserved matters stage as each phase comes forward.
- 9.42 For sunlight exposure it has been modelled that 86% of all facades would be in excess of 90 minutes of sunlight exceeding the BRE recommendation. A further 5% of the facades would see more than 60 minutes of sunlight at the equinox and 4% would have more than 30 minutes of sunlight. This is considered to be an acceptable yardstick for receiving good level of sunlight and provide a good base for future reserved matters applications.
- 9.43 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 is considered to be acceptable.

- 9.44 The submitted daylight and sunlight assessment concludes that the new residential units and the areas of public realm will receive good levels of light and comply with BRE guidelines. With regard to overshadowing, it is considered that, for the majority of amenity areas, the scheme has been designed to achieve appropriate conditions.

Surrounding buildings / land uses to the site

- 9.45 It is noted that there would not be a significant impact from the proposed development to the land to the north and south of the application site. Officers are of the view that the impact on neighbouring properties will be acceptable.

South Street including St David's Court, Beech Court Care Centre and 1-31 The Maltings

- 9.43 Taking into account the maximum parameters, the height of the blocks proposed and the separation distances to these properties it is not considered that the proposals would result in a significant adverse impact on these residents amenity.

32-43 The Maltings

- 9.44 Following further discussion with the applicant a Daylight/Sunlight Note was submitted (DLSL) which considered floorplans provided by the council to ensure the assessment correctly took into account the rooms which are served by the west facing windows that would be most affected by the proposed development.

- 9.45 The four storey west elevation within 32-43 The Maltings have five windows on each floor that would face the application site. The middle window on each floor is not a habitable room but serves circulation space within the apartment block. The two windows either side of the middle window on each floor serve two separate apartments and lead to bedrooms, kitchen and lounge windows. It is understood that the internal configuration is the same on each floor.

- 9.46 Notwithstanding the comparison with other units in The Maltings development it is noted that the west facing elevation would be impacted beyond the BRE recommendations. The VSC at ground floor would range between 22.1-24.5% which is below the BRE 27% recommendation and is more than 0.80 times its former value, although it does incrementally improve in the apartments above.

- 9.47 The shortfall in internal light for the apartments in The Maltings is a significant shortfall, and the effect on light to these rooms would have to be carefully considered for the application.

- 9.48 The applicant has commented that the VSC range of the affected windows are similar to compliant BRE windows and that the proposed maximum parameter massing are a worse case scenario which as a result of the reserved matters may mean that the VSC results are likely to improve further.

- 9.49 It is recognised there would be a noticeable reduction in the internal light for these habitable rooms below the BRE recommended levels, however, this needs to be weighed against the significant wider benefit the development would bring to the area. Therefore, whilst there would be a noticeable reduction in light to these habitable windows for these residents, on balance the reduction in light, whilst noticeable, is not so significantly below the BRE standards to warrant refusal on these grounds given the overall wider benefits of the development as a whole.

Conclusion

- 9.50 Given the above with regard to the outline application, a condition is recommended restricting the maximum number of dwellings to 840. 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

- 9.51 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 re-enforced 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 10sqm 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.
- 9.52 The supporting DAS, Landscape Strategy DAS and Planning Statement set 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 249. The total play area provision would therefore amount to 2,486sqm to be policy compliant on the basis of the 10% affordable housing offer.
- 9.53 The applicant proposes to provide 3161 sqm which would satisfy policy requirements and demonstrate an uplift of overall space within the site. The Design Code allocates the open spaces within the site to ensure that the requirement for all age groups have been met.
- 9.54 The Section 106 is considered the appropriate mechanism to secure the management of these spaces in perpetuity. It is therefore considered the proposal provides sufficient on site open space provision to satisfy London Plan Policy S4 and Local Plan Policy 18.

Housing Provision / Mix and Affordable Housing

- 9.55 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% Social 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.
- 9.56 The application was accompanied by a Financial Viability Appraisal (FVA). 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.
- 9.57 Following the above review, the applicant submitted an addendum in response and concluded that that the scheme cannot viably provide any affordable housing based on

present day industry standard assumptions. Notwithstanding this, the applicant has confirmed they are committed to delivery of the scheme with Affordable Housing in addition to CIL contributions and other financial contributions to make the proposal acceptable in planning terms.

- 9.58 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 alternative conclusion on viability. Officers worked through with the applicant a number of different scenarios with differing proportions of affordable housing provision, larger overall percentages of affordable housing were offered and whilst these would provide a greater overall figure of affordable units, these would have had a lower provision of social rented units those which are specifically identified by the Council to meet the housing demand. As such officers are satisfied that whilst the affordable housing offer would only be 11% of the overall units, the tenure mix of units and the actually units sizes themselves have been maximised to meet the Council's identified need for 2 bed 4 person and 3 bed 6 person units.
- 9.59 Given the size and timescales of the development in delivering up to 840 residential units over 6/7 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.
- 9.60 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 11% 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. Proposals accord with the aims of Policy 4 of the local plan.

Unit Mix

- 9.61 The NPPF (2023) 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.
- 9.62 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 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:
- 9.63 The development would largely provide one-bed and two-bed units, however, there is a proportion of three and four bed units as set out in the table below:

	1 Bed 1P	1 Bed 2P	2 Bed 3P	2 Bed 4P	3 Bed 4P	3 Bed 5P	3 Bed 6P	4 Bed 6P
Private	20-50%		30-60%		10-20%			0-5%
Low-Cost Rent	0%	10%	0%	40%	0%	0%	40%	10%
Intermediate	40%		50%		10%			0%

9.64 However, the Council's Housing Team has been engaged 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 within the Romford Strategic Development Area and has the potential to deliver a significant proportion of 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.

Conclusion

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

Retention of Industrial Floorspace / protection of the LSIS Seedbed site.

9.66 London Plan Policy E4 advocates that sufficient supply of land and premises should be available to meet current and future demands for industrial uses and related functions. An emphasis is placed on locations that are well connected by public transport, walking and cycling which contribute to other planning priorities including housing, schools and other infrastructure. The Seedbed Centre is allocated as a locally significant industrial site (LSIS) which is identified by London Plan Policy E6 and Local Plan Policy 20. In considering proposals for the loss of LSISs and non-designated industrial land, the Council will take into account the wider land-use objectives of the Local Plan because the release of land which is no longer needed for employment use may assist in securing these.

9.67 The current Seedbed Centre provides 3,263 square metres of floorspace where 1,788 is in industrial use. The proposal is for the demolition of buildings within the LSIS, however, whilst the scheme is residential led it includes the provision of a minimum of 3000 square metres of light and general industrial uses.

9.68 The proposed development would be undertaken over a phased period which would allow existing tenants to be re-housed within the new development without needing to find interim accommodation. Over the duration of the application the D&A and Design Code has been amended to ensure that 3000 square metres is available at all times to provide the floorspace for relocation. The units can be configured to create smaller units or amalgamated to create larger units depending on the different business requirements. Further amendments have been made to ensure the ceiling height of the industrial units allows for the inclusion of mezzanines to provide greater flexibility for existing and new industrial uses to utilise. The industrial uses are anticipated to be located in plots A1, A2 and D2 which are adjacent to Rom Valley Way and would be serviced to the rear by undercroft parking and manoeuvring space. The maker's yard area between blocks A1 and A2 provides further external space for

deliveries and servicing for the industrial units. The proposed vehicular route creates a loop to and from Rom Valley Way adjacent to the industrial uses and their parking/servicing areas.

- 9.69 It is considered the combination of the commitment by the applicant and the proposed phasing of the scheme in principle would provide a satisfactory mechanism for industrial units being available to existing businesses for relocation during the course of the development.
- 9.70 To ensure that the floorspace is available during the construction stage over the phased time period it is considered expedient in attaching a planning condition to secure that no less than 3000 square metres would be available at all times. Furthermore, the submission of a detailed method statement which can be secured by planning condition would allow the applicant to explain how the process of rehousing of existing businesses would be implemented. The development would therefore be made acceptable against London Plan Policy E4 and Local Plan Policy 20 by ensuring that sufficient industrial space is maintained throughout the period of construction and post construction.

Traffic, Parking, Access, Servicing and Sustainable Transport

- 9.71 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..
- 9.72 The application is accompanied by a Transport Assessment. 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 who has not raised any objections to the proposal.
- 9.73 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 current use of the site.
- 9.74 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 / above policy requirements. This will be secured by an appropriate condition.
- 9.75 Vehicular access to the Site, including for refuse and delivery, is provided via Rom Valley Way and Davidson Way linking to the internal spine access road.
- 9.76 The overall car parking ratio is 0.03 car parking spaces per residential unit (840). The applicant has confirmed that a minimum of 3% would allow for disabled residential parking. The scheme comprises 44 car spaces (accessible spaces), comprising 26 residential, 17

industrial and 1 car club space. The PTAL of the site ranges between 4 and 6a and is considered to be excellent.

- 9.77 The scheme will provide approximately 1,550 cycle spaces across the site, including 22 for visitors to be located on Sheffield stands. TfL has advised that the proposed cycle parking quantum exceeds the minimum London Plan quantum requirements. Taking into account the cycling parking section in the Design Code it is considered that a planning condition for details of how the parking areas are designed can ensure that the LCDS standards in qualitative terms are incorporated into the scheme to satisfy London Plan Policy T5.
- 9.78 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, officers 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

- 9.79 The Parameter Plans highlight a central spine 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 Davidson 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.
- 9.80 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.
- 9.81 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. The two existing vehicle accesses are retained into the site, however the section between the 'Makers Yard' and Davidson Way access will be controlled to reduce the number of vehicle movements outside the school. Fewer vehicles will make a more suitable environment for school patrons and TfL supports that the site has been designed to minimise the potential conflict between pedestrians, cyclists and vehicles by providing multiple internal, segregated walking routes. As such, there is no potential for the internal road for rat-running given the no through nature of this area. There should however, be 'non-friendly to the private car' treatments in terms of road design/pedestrian linkages in accordance with Government best practice and guidance relevant at the time will also be required as part of any future reserved matters submission.

Public Transport

- 9.82 The wider area is also served by numerous bus routes currently serve the site at stops on the A1251 Oldchurch Road by the adjacent Homebase site to the north, and a further two routes stop at the Queens Hospital on the opposite side of Rom Valley Way. The nearest railway station is Romford, which is well within reasonable walking distance (960m) of all of the site. It is served by the Elizabeth Line, London Overground and Greater Anglia routes.

Consequently, the Public Transport Access Level (PTAL) is excellent, at 6a level (the far south part of the site is 4), on a scale from 0 to 6b.

- 9.83 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.
- 9.84 The Local Highway Authority has raised no objections and as such, it is considered that 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.

Conclusion

- 9.85 Overall, the transport assessment, wider area traffic modelling undertaken 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 mode 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.
- 9.86 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.
- 9.87 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.

Sustainability and Energy Efficiency

- 9.88 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*
- 9.89 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.

9.90 The energy report sets out that a 48% reductions in regulated CO₂ emissions, predicted to be achieved onsite across domestic and no-domestic uses.

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

<p>“Be Lean” – The applicant is committed to reducing energy demand and CO₂ emissions related to the development.</p> <ul style="list-style-type: none"> • 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.
<p>“Be Clean” – typically be associated with Combined Heat and Power (CHP). The following measures are proposed to that effect:</p> <ul style="list-style-type: none"> • Previously an energy centre was proposed to be located within the Development to kickstart a new District Heating Network for Romford. As the development is aiming to be net zero carbon this has been discontinued. • Each building will be provided with a central plant area for building wide communal heating plant to supply heat to all uses within each building. • Proposed strategy is Air Source Heat Pump (ASHP) led and therefore falls under the ‘Be Green’ step.
<p>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.</p> <ul style="list-style-type: none"> • ASHPs • Solar PV Panels – The site will provide significant installations of PV panels to the most appropriate areas. These total as a solar PV array of 490 square metres.

9.92 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 48% with 19% comprising the reduction through lean measures alone. In terms of carbon offset, it is estimated that 12,867 tonnes of residential CO₂ and 1,743 tonnes of non-domestic CO₂ would need to be offset. This is estimated at £1,388,011 and the mechanism to secure this would be through the section 106 agreement.

Ecology and Biodiversity

9.84 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.

It is important that 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.

- 9.85 The application is accompanied by an Environmental Statement (ES), which includes consideration of the ecological and biodiversity interests on the site. The Environmental Statement and Preliminary Ecological Appraisal in correlation with the submitted Biodiversity Net Gain Technical Note has been considered and there is sufficient ecological information available for determination of this application. This provides certainty of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.
- 9.86 It is considered the proposal during the demolition/construction stage does not affect any statutory or non-statutory site designations in respect of geological, ecological, or landscapes sites or have significant impacts on the protection of soils. During operational there will an increase in recreational pressure which may adversely impact designated sites, however, this is considered to the low due to the provision of amenity space within the wider masterplan site.
- 9.87 In respect of local habitats within the site and wider masterplan area there is amenity grassland, buildings/hard standings, planted shrubs, broadleaved trees and scattered scrub. Heavily influencing the site is the River Rom which forms the eastern and southern boundary to the masterplan area.
- 9.88 It is considered expedient to secure the mitigation measures identified in the Environmental Statement and associated appendices by condition and that they implemented in full. This is necessary to conserve and enhance protected and Priority species particularly bats and nesting birds, and the River Rom and riparian corridor.
- 9.89 The site is generally of low importance for biodiversity, however, the River Rom contains several areas of scattered scrub along the bank. The River Rom itself is in a poor condition as is it heavily modified with reinforced concrete channel and banks, with no in-channel or bankside vegetation and is polluted. The vegetation adjacent to it consists of scattered native and non-native scrub and scattered trees.
- 9.90 Local Plan Policy 31 advocates that the Council will seek to enhance the river environment by requiring major developments in close proximity to a river to investigate and, where feasible, secure opportunities to restore and enhance rivers and their corridors in line with the Thames River Basin Management Plan (RBMP).
- 9.91 Following discussions between the Environment Agency and the applicant a Technical Note has been submitted to accompany the masterplan application which provides a summary of the options and sets out the potential for enhancement. The significant enhancement measures included as part of the Proposed Development will comprise removal of the existing vertical concrete river wall and provision of a sloped and terraced bank. It is important that the top of the banks are maintained for flood protection and to tie into the surrounding urban areas. Where proposed slopes and terraces do not fully reach the river bed, hanging planting which trails into the river channel will be used to enhance the green link. An additional planted terrace will also be included within the high flow channel. Coir rolls will be located within the low flow channel, to promote agglomeration of aquatic plants and improve biodiversity. Setting back the existing vertical concrete wall provides significant

betterment, alongside the proposed aquatic and terrestrial planting which in turn provides the biodiversity potential of the site and the potential in creating new wildlife habitats.

- 9.92 It is acknowledged that the development cumulatively aims to retain and enhance the ecological network and it is recognised that the applicant has explored the naturalization of the River Rom which borders the masterplan site.
- 9.93 Taking a proportional approach it is considered conditions would be recommended in relation to habitat creation and enhancement within the site as well as in relation to the mitigation of possible impacts from construction activity, as recommended by the ES. This would ensure the development is acceptable and would accord with national and local planning policies.
- 9.94 Biodiversity enhancements, including for the River Rom, have been recommended to secure net gains for biodiversity, as outlined under Paragraph 174d of the National Planning Policy Framework (2023). The Biodiversity Net Gain Technical Note indicated that the proposal as submitted resulted in a gain of 6.13 habitat units (60.71% increase), a gain of 0.31 in hedgerow units (73.79% increase) and deliver 2.7 River Units offsite. The scheme has changed since these calculations were undertaken.
- 9.95 It is recognised that the Metric will need to be re-submitted at Reserved Matters once more detailed proposals are available for the site and for the River Rom.

Conclusion

- 9.96 The mitigation measures identified in the Environmental Statement Chapter 11 and associated appendices are considered acceptable and as such would be expedient to secure by planning condition to conserve and enhance protected and Priority species particularly bats and nesting birds, and the River Rom and riparian corridor. This would ensure the development is acceptable against the LPA's statutory duties, London Plan and Local Plan policies.

Flood Risk, Drainage and Urban Green Factor

- 9.97 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. 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.
- 9.98 The application site is in the most part 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.
- 9.99 Sustainable urban drainage systems have been incorporated into the proposal in the form of green/brown roofs, pervious surfaces, rainwater harvesting, filter drains, and rain gardens. Green roofs on upper levels would feed the water onto 'blue roofs' or geocellular storage at

podium levels. This water would then be led into large underground attenuation tanks, located under amenity spaces, before being directed into the River Rom.

- 9.100 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 and technical notes provided via the EA pre-app for the naturalisation of the River Rom are acceptable. 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.
- 9.101 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 0.4062 exceeding both of these targets. This would be achieved through a range of urban greening measures, including public realm landscaping, trees, natural vegetation, tree planting, pocket parks, podium courtyard spaces and naturalisation of the River Rom. Finally, should outline planning permission be granted a condition would be imposed seeking UGF assessment for phases 2-6 of the proposals.

Environmental Issues

Land Contamination

- 9.102 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.
- 9.103 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 previously developed land. Therefore some remediation and contamination works would be required to secure the site for future use. These will be secured via conditions.

Air Quality

- 9.104 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

- 9.105 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

9.106 The accompanying Heritage Statement considers both above ground and below ground (archaeology) heritage. 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.

Sustainable Waste Management

9.107 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;
- viii. Provide innovative solutions to reduce waste at source.

9.108 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).

9.109 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.

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

Accessibility and Inclusivity

9.111 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.

9.112 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'

9.113 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, it is anticipated that accessible site levels for the 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.

Secure by Design

9.114 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.

9.115 Detailed drawings 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.

9.116 The majority of the site would be developed in a simple block structure, which is typical of the area. The Design Code includes 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

9.117 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.

9.118 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.

10.0 Financial and Other Mitigation

- 10.96 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.
- 10.97 The proposal would attract the following Community Infrastructure Levy contributions to mitigate the impact of the development:
- 10.98 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.
- 10.99 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.
- 10.100 The applicant has provided a breakdown of the proposed buildings, which could result in the following CIL payments:

Planning obligation	Monetary contribution
Mayoral CIL	£2,084,125
Borough CIL	£10,420,625

- 10.101 As this is an Outline application, liability to pay CIL only arises once Reserved Matters applications are approved.

Equalities

- 10.102 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; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 10.103 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.
- 10.104 Policy CG1 of the London Plan also seeks to support and promote the creation of an inclusive city to address inequality.

10.105 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.

10.106 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.

11.0 **Conclusions**

11.1 This comprehensive proposal has been developed through pre-application and public engagement exercises over the last 3 years.

11.2 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.

11.3 The proposed development would bring forward a level of open market and affordable housing in a sustainable area which is supported in tandem by a new two form entry school (considered under P2071.22) linked by legal agreement. Through appropriate planning conditions an acceptable level of industrial floorspace will be maintained which ensures an acceptable level of employment opportunities of the LSIS allocation. Furthermore, the proposal would see a significant improvement to the natural environment through the naturalisation of the River Rom which borders the site.

11.4 The application material, including the Environmental Information contained within the Environmental Statement, traffic assessment and Design Code that the quantum, type, scale, density and mix of uses can be achieved, subject to suitable controls (including off site infrastructure provided through the S106 agreement) without significantly harming environmental, amenity and economic conditions in the borough

11.5 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. Although there still remains shortfalls to existing occupier's amenity it is considered there to be sufficient factors to weigh against the harm. 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.

11.6 Complementary health as part of applicable CIL payments, are also proposed to mitigate the demands placed on existing health infrastructure that would be affected by the development.

11.7 The proposals would deliver, architecture and landscape design that would be complementary to the context of the site and serve to lift the appearance of the wider area harmonising with the Rom Valley Way.

11.8 The re-development of the site would deliver connections, energy and increased activity to this part of Romford. It is envisaged that significant improvements to the local environment will take place with integration between the site and the town as a whole would be enhanced through improvements to connectivity to the town centre and the railway station, Rom Valley Way and more widely, with the proposed highway improvement scheme. The proposal would

deliver up to 840 new homes which will be located on a previously developed site. In brief, a mixed use development is being brought forward which includes community facilities such as shops, cafes, bars, opportunities for informal play within various pocket parks and improvements / naturalisation of the River Rom.

- 11.9 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, the proposed planning conditions and the prior completion of a S.106 agreement, the application is recommended accordingly for approval.