



Havering
LONDON BOROUGH

**Strategic Planning
Committee
27 February 2025**

Application References:	P1274.23 and P1150.24
Location:	Land bound by Chippenham Road, Kings Lynn Drive & Dartfields, Harold Hill
Ward	Heaton
Description:	<p>P1274.23 - Demolition of all existing buildings and structures – The Alderman Public House</p> <p>P1150.24 - Redevelopment of the site and the erection of four residential blocks to provide 138 affordable housing units to include landscaping works, car parking, cycle parking, plant and associated works.</p>
Case Officer:	Richard Byrne
Reason for Report to Committee:	The application is by or on behalf of the Council and is a significant development.

1.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 1.1 The proposal sits within the regeneration masterplan for Harold Hill which includes the Family Welcome Centre off Hilldene Avenue and the Harold Hill District Centre on Hilldene Avenue / Farnham Road. The Family Welcome Centre is Phase I and comprises a part-four storey hostel facility and a health care centre, currently under construction. Phase III is the proposed re-development of the District Centre comprising a mixed-use development which is in an advance stage of design development with consultation undertaken recently with the community and stakeholders.
- 1.2 The proposal for Chippenham Road is Phase II of the masterplan and comprises multi-storey blocks delivering a fully affordable housing scheme including specialist housing accommodation for care leavers. The scheme proposes 138 flatted homes, split between 116 affordable homes and 22 supported living homes distributed over four principal blocks. In addition, landscaping works within the newly created courtyards and on the perimeter of the site with car parking, cycle parking, plant and associated works.
- 1.3 This report sets out the detailed considerations for the main planning application for the redevelopment of the land bound by Chippenham Road, King's Lynn Drive and Dartfields. In addition, the site includes The Alderman public house for which a separate application has been submitted covering the demolition of the public house. For ease it is considered appropriate to include the assessment of the proposed loss of the public house and its demolition in this combined report.

- 1.4 The report will also give a detailed review of the proposed development as well as considering the potential built and environmental impacts. The approach to site layout, height and massing has been given carefully considered with regard to the location of the site. The proposal, at pre-submission stage, has been reviewed by Members of the Strategic Planning Committee and the Council's Quality Review Panel.
- 1.5 The proposed loss of the public house has been considered and the mechanism to secure an interim use in the existing Harold Hill District Centre and a permanent provision in the redeveloped Centre will be set out in the terms of the Legal Agreement.
- 1.6 Officers have considered the proposal in respect of any harm to the natural and built environment in accordance with the principles of sustainable development and if the scheme would meet an identified housing need. The proposal has been considered in respect of being within an area of sustainability and of the impact on the visual character of the area.
- 1.7 The development of the site proposes a modern, contemporary design which would inform the future development of Phase II of the Harold Hill redevelopment proposal.
- 1.8 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.

2.0 RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission for P1274.23 subject to:

- a) Completion of a legal agreement or unilateral undertaking whichever is the appropriate legal mechanism pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended) and all other enabling powers to secure the following planning obligations:
- Submission of an Air Quality Neutral Assessment and securing mitigation measures
 - To not commence demolition of buildings under P1274.23 and/or P1150.24 until a suitable space in the existing Harold Hill District Centre as an interim replacement facility for The Alderman has been identified.
 - To submit a fit-out schedule for the identified unit.
 - To submit a marketing and lease strategy for the identified unit; and,
 - Provide a permanent replacement provision for a public house within the redevelopment of the Harold Hill District Centre.
- b) That the Director Planning is delegated authority to issue the planning permission subject to a legal agreement or unilateral undertaking whichever is the appropriate legal mechanism (detailed above) and imposition of the conditions [and informatives] below to secure the following matters:

Proposed Conditions:

1. Time Limit
2. Scheme Accordance
3. Demolition Method Statement, Asbestos Management Plan and Site Waste Management Plan
4. Non-Road Mobile Machinery (NRMM)
5. Protection of Trees

6. Times of Demolition (08.00 to 18.00 on Monday to Friday and 08.00 to 13.00 hours on Saturdays). No demolition or construction works, or deliveries shall take place on Sundays, Bank or Public Holidays.

Informatives

1. NRMM advice

2.2 That the Committee resolve to GRANT planning permission for P1150.24 subject to:

- a) Completion of a legal agreement or unilateral undertaking whichever is the appropriate legal mechanism pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended) and all other enabling powers to secure the following planning obligations:

Affordable Housing

- Mix of units
- Tenure of units

Biodiversity

- Biodiversity Gain Plan demonstrating the delivery of Biodiversity Net Gain of at least 10% above the Biodiversity Net Gain Baseline to be submitted and approved prior to commencement of development

Highways

- 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 Plan. The full travel plan should include car and cycle parking monitoring;
- Entering into and completing any necessary highways agreement pursuant to section 278 of the Highways Act 1980 (and other enabling powers) prior to commencement of development

Education provision

- To make a contribution of up to £730,617 for secondary/SEND places, subject to further consideration of the needs arising from the development.

Carbon offset

- Submit an updated energy statement;
- To pay the relevant carbon offset contribution (On the basis of the indicative scheme the financial contribution of £77,565).

Management and maintenance of Public Open Space and Play Space

- Demonstration how the public open spaces and play spaces are brought into use, managed and maintained.

Employment

- Submission and approval by the council of a training and recruitment plan with target/s for the recruitment of local residents
- Submission and approval by the council of an education commitments Plan with for skills training roles for local residents
- 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.
- b) That the Director Planning is delegated authority to issue the planning permission subject a legal agreement or unilateral undertaking whichever is the appropriate legal mechanism and the imposition of the conditions [and informatives] below to secure the following matters:

Proposed Conditions:

1. Three years
2. Scheme Accordance
3. Circular Economy
4. CEMP and SWMP
5. CEMP for Biodiversity
6. Habitat Management and Monitoring Plan (HMMP)
7. Piling Method Statement
8. Petrol and Oil Interceptors
9. Non-Road Mobile Machinery (NRMM)
10. Archaeology
11. Public Engagement – Archaeology
12. Site and Floor levels
13. Details of Drainage Strategy
14. Site Highway Works
15. Electric Vehicle Charging
16. Landscape Management Plan (LMP)
17. Protection of Trees
18. Retention and Reuse of Tree T17 within the Site
19. Secured by Design Award Scheme
20. Fire Hydrant
21. SuDs Maintenance
22. Achieve a Certificate of Compliance
23. Methodology for Tree Planting
24. Materials
25. Boundary treatments
26. Contamination land
27. Unsuspected contamination
28. Foundation Design
29. Biodiversity Enhancement Strategy
30. Parking Management Plan
31. Wildlife Sensitive Lighting Design Scheme
32. Delivery and Servicing Plan
33. Waste Management Strategy
34. Green Roofs

35. Accessible and adaptable dwellings and wheelchair users dwellings compliance
36. Urban Greening factor (UGF)
37. Accordance with Ecological Appraisal
38. Fire Safety
39. Flood Risk Assessment
40. Rainwater harvesting and greywater collection systems
41. Implementation of Landscaping Scheme
42. Water Efficiency
43. Stopping Up Order of highway within the application site pursuant to Section 247 of the Town and Country Planning Act

Informatives

1. Advice for Written schemes of investigation
 2. Guidelines for Archaeological Projects in Greater London
 3. advice of the Metropolitan Police Service Designing out Crime Officers
 4. Thames Water advice
 5. Groundwater Risk Management Permit advice
 6. Carry out a condition survey of the carriageway and footways
- 2.3 That the Director of Planning is delegated authority to negotiate the legal agreement or unilateral undertaking whichever is the appropriate legal mechanism indicated above and that if not completed by the 31st August 2025 the Director of Planning is delegated authority to refuse planning permission or extend the timeframe to grant approval.

3.0 SITE AND SURROUNDINGS

- 3.1 The site is broadly rectangular in shape and bound by Chippenham Road to the north, Kings Lynn Drive to the south, and Dartfields to the east and west. The site is spread across two parcels of land, straddling a central plot which is outside of the application site. This central plot is currently occupied by St. George's Church, a funeral parlour, and a vicarage. There are protected trees in the western parcel which are prominent in the Chippenham Road street scene.
- 3.2 The eastern parcel consists of one detached three-storey building occupied by self-contained flats, eight two-storey dwellings and former Council Housing offices all fronting onto Chippenham Road. The western parcel is made up of a public house and two detached buildings, which are two and three-storeys in height and include self-contained flats fronting onto Kings Lynn Drive.
- 3.3 The site is not in a conservation area, nor subject to any other designations. The site does not have a specific allocation in the Local Plan. However, it is part of a wider masterplan being undertaken by the Council's Regeneration team in Farnham and Hilldene. The topography of the site is such that the land rises up significantly from the Chippenham Road side of the site to Kings Lynn Drive.

4.0 DESCRIPTION OF PROPOSAL

- 4.1 The proposal is to demolish the buildings on the site to facilitate the erection of four residential blocks accommodating up to 138 flatted homes, split between 116 affordable homes and 22 supported living homes. The proposed work involves landscaping works, car parking, cycle parking, plant and associated works.

- 4.2 The four residential blocks are arranged to create courtyards, with breaks in the massing for the retained trees, offsets from adjoining buildings and to allow light into the central areas. Duplex homes would be created to activate Chippenham Road, King's Lynn Drive and courtyards.
- 4.3 The height and massing of the blocks have been designed taking into account the topography difference. The building height would project six storey facing Chippenham Road which reduces to five storey facing King's Lynn Drive.
- 4.4 The duplex homes would be accessed directly from Chippenham Road or King's Lynn Drive. Access to the upper floors of the residential blocks are principally taken from the corner of the building footprint with waste and cycle storage located adjacent to the entrance lobby, lift, plant rooms and core stairs.
- 4.5 The buildings are constructed with a two-tone facing brick with a corduroy brick pattern at the lower level, between fenestration through the middle section and the upper part of the building. Deck access is provided with a solid patterned balustrade and metalwork railing to enclosed balconies. Resident entrances would be articulated with glazed brick with level access to the street.
- 4.6 The proposed housing mix comprises the following:

	Affordable	Care Leavers Homes	Total
1B1P	1		1
1B2P	32	22	54
2B3P	5		5
2B4P	56		56
3B4P	1		1
3B5P	10		10
3B5P Duplex	9		9
4B6P Duplex	2		2
Total	116	22	138

- 4.7 All properties are to be built to Nationally Described Space Standards (NDSS) and the accessible homes would be a mixture of 2 bed 3 person homes and 2 bed 4 person homes across Block A1 (9 homes) and Block B1 (5 homes). Both blocks containing the accessible homes would face onto Chippenham Road providing level access, thus avoiding the level change within the Site.
- 4.8 The proposed care leavers' accommodation will be for those young people who are transitioning out of the care system within the Borough. The accommodation is typically a supportive environment with enhanced security and carers on site 24 hours a day. Tenants will be working towards independent living and long-term stability. For clarity, there is no specific provision within the development for people with special educational needs.
- 4.9 The external areas are characterised to fall into three distinct groups.
- 4.10 Within the central area the blocks have been characterised as residential gardens which would include children play, connecting paths, resting areas and landscaping.
- 4.11 A community garden is proposed in the central area of the site, adjacent to King's Lynn Drive which is intended to be a multifunctional space accommodating areas for ages 12+

play and exercise, a dedicated space for care-leaver residents, ensuring their needs are met within the community and a communal allotment.

- 4.12 The third character area comprises the perimeter areas of the site occupied by car parking and front gardens. The proposals include 44 car parking spaces to be provided on-site as set out in the table below. The on-site car parking will be provided along Chippenham Road and Kings Lynn Drive, in the form of perpendicular parking bays.

Type of Parking	Proposed
Residential Parking – Standard bays	36
Residential Parking – Accessible bays	5
Staff parking bays	2
Car club bay	1
Total	44

- 4.13 It is proposed to provide 264 long stay cycle parking spaces distributed across the four blocks and 16 short stay parking spaces. The long stay spaces have been designed with regard to TfL’s London Cycling Design Standards and proposes a mix comprising 80% two tier stands, 15% Standard Sheffield stands and 5% Accessible Sheffield stands.

5.0 PLANNING HISTORY

- 5.1 As this application seeks the complete re-development of the site, the following cases are considered most relevant:

F0003.23 – Prior Approval for the demolition of existing structures. Prior Approval given on 7 September 2023.

F0008.20 – Prior Approval for the demolition of existing structures. Prior approval given on 1 May 2020.

6.0 PRE-APPLICATION DISCUSSIONS

- 6.1 Prior to the submission of this planning application, the applicant has engaged with LBH planning and design officers. 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.

- 6.2 The proposal was presented to the Council’s Quality Review Panel on 21 November 2023. The comments are summarised below with the Applicant response.

Summary of QRP Comments and Applicant Comments – 21 November 2023	
QRP Comment	Applicant Comments
Height and massing	
It is supported the proposed approach to the form and massing proposed for the development. However, it suggests exploring whether the massing of Buildings A2 and B2 could be redistributed, with the higher blocks remaining to the north. A2 and the south-facing element of B2 on Kings Lynn Drive could be reduced by one	Amendments were made to the massing distribution of the scheme across the site, as detailed below. <ul style="list-style-type: none"> - Step down of massing to Building A2 for a more sensitive relationship to the church; - Adjusted massing to Dartfields East with B1 and B2 at one storey lower than previous;

<p>storey, with the height moved to A1 and to the eastern elements of B1 and B2 on Dartfields (East). This could create a more sympathetic relationship with the site's surroundings, as well as improving the block's form factor.</p>	<ul style="list-style-type: none"> - Setback top floor above gallery access of all buildings; - Reduced massing on Kings Lynn Drive from 5 to 4 storeys; - Massing from Kings Lynn Drive redistributed into Dartfields East; and - Reduction in massing above A1 pinch point by one floor and shift in footprint away from pinch point. <p>Block A1 – 5-6 storeys Block A2 – 4-5 storeys Block B1 – 5-6 storeys Block B2 – 4-5 storeys</p>
<p>Consider how plans for the high street masterplan phase immediately to the north will relate to the proposals. It is important that the massing and height of the development should respond to the emerging as well as the existing context, and an ongoing conversation is therefore needed.</p>	<p>The Site is adjacent to Farnham and Hilldene estate to north for which there are separate emerging proposals for redevelopment. The scheme is currently going through pre-application discussions with LBH. The Proposed Development has been designed to account for the future redevelopment of Farnham and Hilldene.</p>
Architecture	
<p>The architectural approach is developing in a positive direction. Façade studies incorporate interesting depth and variation, and the link to geological strata is a promising concept.</p>	<p>No comment required.</p>
<p>It is acknowledged that the loss of The Alderman public house creates policy issues. However, it is not considered that the pub makes a positive architectural contribution and its retention would compromise the quality of the scheme as it occupies a significant area of the site.</p>	<p>A further letter has been submitted from LB Havering Regeneration confirming the intention to re-provide the pub within Phase 1 of the Farnham and Hilldene scheme coming forward in early 2025.</p>
<p>The inclusion of access decks gives depth to façades. It notes that the dual aspect design of some units relies on windows that will open over decks, which may reduce their use. The design approach should aim to balance these factors.</p>	<p>Only kitchen windows open onto the deck access, this creates positive overlooking, articulation and the opportunity for 'neighbourliness'.</p> <p>The window sill height is 1.15m which provides privacy, but also allows the resident to populate and personalise their flat.</p>
<p>It is noted that many flats have</p>	<p>We looked to ensure that design offered a</p>

<p>balconies that overlook the courtyards. It suggests that the design should also offer options for balconies with more privacy that face gable ends. This could be achieved by moving some decks to the opposite side of blocks.</p>	<p>variation of balcony options.</p> <p>On a typical floor, 17 balconies face into the courtyard, while 16 face onto gable ends, or out to the street.</p> <p>The decks were positioned to add depth and activity to the street, while in the inclusion of balconies to the courtyard look to add ownership of the internal landscape</p>
<p>Landscape and amenity</p>	
<p>It is acknowledged the challenging nature of the site topography. However, fully responding to and incorporating this into the designs will prove crucial to the scheme's success. It therefore recommends developing a three-dimensional study of the landscape to help ensure site levels inform the design approach.</p>	<p>The challenging site topography has been a key focus of the design process from the outset, with three-dimensional studies informing the approach since the concept design stage. The first study, exploring multiple options for areas with significant level changes, was presented during the Pre-App in November 2023. Further detailed studies were shared in the subsequent Pre-App in December 2023. By February 2024, the design was refined and directly compared to these level studies, demonstrating how it has evolved in response to received comments, analysis results, and site constraints, ensuring the topography is fully integrated into the scheme.</p>
<p>More work is encouraged to resolve the way the site relates to nearby green spaces. It could act as a key link from the high street to the network of green spaces to the south on Kings Lynn Drive. The development can play a more positive role in this network by providing a route through the site rather than creating a blockage.</p>	<p>The creation of a route through the site was carefully considered during the early design stages, with various options explored. However, due to the challenging site levels, establishing an accessible route would necessitate long ramps that would encroach on and divide the communal areas. This would pose significant security risks, particularly given the proximity to the boundary of St George's Parish Church, which lacks adequate natural surveillance. Considering these constraints, it was determined that prioritising the safety and privacy of residents required closing the communal areas as public through routes.</p>
<p>The development of a safe crossing over Kings Lynn Drive from the site is encouraged to allow children to reach the adjoining green space. This route and the quality of the existing space should form part of the play strategy for the site, in conversation with council officers.</p>	<p>For the safety and benefit of children, the proposed play areas are designed to be enclosed and exclusively for the use of residents. While the footpath and road are not part of the site, there is an existing crossing at the corner of Kings Lynn Drive and Dartfields Road West, which is close to the entrance of the communal space for Blocks A1 and A2, and can be used to reach</p>

	<p>the green space. For residents of Blocks B1 and B2, the crossing between King Lynn Drive and Dartfields East provides a convenient route to the nearby green space.</p>
<p>The courtyards, currently dominated by play space, should include a wider range of space type so that they provide social spaces for all age groups within the new residential community. The inclusion of swings should be reconsidered, as they make inefficient use of space.</p>	<p>The residential courtyards are designed exclusively for the residents, providing a secure and welcoming environment with well-defined boundaries. These spaces primarily feature multi-generational play areas that are safe and inviting for children, and at the same time incorporate social spaces for gathering and sitting for teenagers and adults. The inclusion of swings has been carefully considered to ensure the courtyards cater to a multi-generational community. The selected swings are designed for use by babies and parents, older children, and adults, fostering a sense of inclusivity and playfulness for all age groups. Additionally, swings are particularly beneficial for promoting play among girls, who often use them socially in groups.</p>
<p>Further thinking is recommended on how the development's urban greening factor can be increased. The design of the courtyards should be reconsidered, including the removal of swings, to reduce the areas of hard surfacing and create more opportunity for planting. Further opportunities for greening should be sought across the site.</p>	<p>The urban greening factor target score of 0.4 is applicable to the application, as it is predominantly residential. The site achieves a score of 0.45, which exceeds this requirement, maximising urban-greening on site.</p>
Site layout	
<p>It is recommended to develop a clear movement strategy for the site, showing how pedestrians and cyclists will access and navigate it. This should include consideration of how people will arrive at the site from across the wider area, and the way it fits into the movement networks of Harold Hill.</p>	<p>There is no access between the sites by vehicle. The Site is bordered by footways on Chippenham Road to the north, Dartfields to the east and west and Kings Lynn Drive to the south, therefore providing good accessibility to the Site by foot:</p>
<p>Further work is needed to consider how disabled people will access the site. The steepness of Dartfields makes access to accessible flats via the site perimeter to the units adjacent to Kings Lynn Drive, impossible. This could either be addressed by modelling access via cores on Chippenham Road and courtyards.</p>	<p>The proposal includes 14 accessible homes (scaled to accord with Building Regulations Part M4(3)(2)(a). This equates to an overall provision of 10% accessible homes within the Proposed Development.</p> <p>The accessible homes would be a mixture of 2 bed 3 person homes and 2 bed 4 person homes across Block A1 (9 homes) and Block</p>

<p>Alternatively, all wheelchair accessible units could be moved to blocks fronting onto Chippenham Road.</p>	<p>B1 (5 homes). Both blocks containing the accessible homes would face onto Chippenham Road providing level access, avoiding the level change within the Site. All users, including wheelchair users, would have access to the communal courtyards associated with their respective blocks.</p>
<p>The central car park could be vulnerable to antisocial behaviour. It recommends distributing parking across the site instead, which could also allow buildings to be more closely grouped together, occupying more of the central space. More discussions should take place with Council officers on managing parking, including on surrounding streets.</p>	<p>Within the Proposed Development, 44 car parking spaces are proposed, including 5 accessible parking spaces in line with requirements. Parking would be provided to the north and south of the Site, along Chippenham Road and Kings Lynn Drive in the form of perpendicular parking bays.</p>
<p>Parking close to the colonnades on Chippenham Road could conceal entrances to the building, removing passive surveillance. The panel advises using sections to consider how this can be addressed.</p>	<p>The design has been carefully developed to ensure that no building entrance is obstructed by a parking space. The rationalisation of car parking spaces ensures that each entrance has a clear, unobstructed path to the public footpath or is fronted by an area of soft landscaping, maintaining visibility and passive surveillance. The entrances will be well lit, secure and covered by CCTV.</p> <p>The introduction of duplex units and habitable rooms on ground floor also increase the passive surveillance in the area.</p> <p>The car parking spaces will be private spaces, for use by residents of the development only, therefore residents will be familiar with the parking arrangement and the building access points.</p>
<p>Site boundaries</p>	
<p>Further thinking about the quality and function of the spaces around the site's buildings. More work is needed to ensure that spaces around the edge of site are designed purposefully and are not left over.</p>	<p>The spaces around the buildings have been purposefully designed to maximise their functionality and respond to the site's topography.</p> <p>The play area near Block B incorporates the levels by featuring slides, climbing elements, and stepping features that encourage imaginative play. Areas that were deemed unsuitable as through- routes, as they are open to the public, such as the space behind Block A2, have been intentionally utilised for landscaping with native hedgerows and scrub. While these areas are not designated</p>

	<p>as amenity spaces, they contribute meaningfully to the site's biodiversity net gain. The thresholds and interfaces between each building and its adjacent external spaces have been further coordinated and all levels resolved for accessible means of access and clear lines of sight for passive surveillance as well as secure by design sign off.</p>
<p>The south-western corner of Block A1 creates a pinch point with the pavement on Dartfields, which needs to be addressed.</p>	<p>This has been addressed through a reduction in massing above A1 pinch point by one floor (loss of two homes) and shift in footprint away from pinch point.</p>
<p>Further consideration of the quality of the views into the courtyard from the site boundaries. A combination of solid and open boundary treatment could allow for an interesting mix of glimpses into courtyards.</p>	<p>The proposed boundaries to the courtyards consist of mesh steel fences combined with climbing plants. The varying establishment rates, flowering times, and growth patterns of the selected plant species will create a dynamic and visually engaging boundary, offering a mix of glimpses into the courtyards. This approach avoids the use of solid boundary treatments, which could reduce sunlight penetration into the courtyards.</p>
<p>Supports the net zero carbon strategy for the development but asks for a more detailed sustainability strategy to show how it will be achieved without the use of offsetting. This should include more consideration of how the material strategy for the development will address embodied carbon, and how the heating and ventilation approach will reduce operational carbon. This is particularly important in light of the proposed demolitions.</p>	<p>Comment repeated below.</p>
Sustainability	
<p>Supports the net zero carbon strategy for the development but asks for a more detailed sustainability strategy to show how it will be achieved without the use of offsetting. This should include more consideration of how the material strategy for the development will address embodied carbon, and how the heating and ventilation approach will reduce operational carbon. This is particularly important in light of the proposed demolitions.</p>	<p>A sustainability strategy has been developed for the Proposed Development which will be used throughout design and construction to ensure the integration of sustainable design practices into all aspects of decision making.</p> <p>A pre-demolition audit could be conditioned to provide a detailed inventory of the materials in the building that will need to be managed upon demolition to identify opportunities for reuse and recycling.</p> <p>The design follows the energy hierarchy</p>

	<p>approach, aiming to include energy efficiency measures to reduce energy demand. The energy strategy follows the energy hierarchy approach of 'Be Lean', 'Be Clean', 'Be Green', 'Be Seen' to achieve the minimum savings required on Site with the net zero carbon target across the development then met through a carbon offset payment. The heating strategy has been designed with an allowance for a connection to a future heating district should one become available in the area.</p>
<p>It is suggested using self-supported structures for the deck access walkways instead of reinforced concrete to reduce both thermal bridging and the scheme's embodied carbon impact.</p>	<p>At this stage the structure is thermally broken concrete. We will investigate the detail design of these elements at the next Workstage and endeavour to reduce the embodied carbon impact.</p>
<p>Pleased to see that windows are horizontally aligned and their size well-balanced. It notes that they should be fully openable to allow purge ventilation.</p>	<p>Confirmed.</p>
<p>Suggests that the depth of window reveals for north-facing flats may need to be reduced to allow enough solar gain.</p>	<p>Through design it was not anticipated that the depth of window reveals to the north-facing windows needed to be reduced.</p>
<p>The potential to host include sustainable drainage systems (SuDS), which would benefit from the site's gradient, and asks for designs to be developed.</p>	<p>A SuDS Strategy has been prepared and confirms that the post development surface water flow from the Site will be restricted to 2.2 litres per second for Site A (Blocks A1 and A2) and 2 litres per second for Site B (Blocks B1 and B2) for the one in one year, one in 30 years and one in 100 years storm events.</p>
Sustainability and Carbon	
<p>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.</p>	<p>An Energy Assessment has been prepared which addresses the low carbon ambitions and sets specific and quantifiable targets for energy and carbon to ensure the aspirations are delivered.</p> <p>A Sustainable Design Statement has also been prepared to ensure sustainable design practices are integrated in the scheme across a wide range of environmental and other sustainability topics.</p>

- 6.3 Following previous Pre-App and QRP comments, the design team attended a series of workshops / meetings with Council officers to address previous concerns raised. Through this process the design team made significant updates to improve the quality of the scheme. Officers are satisfied that the updates have created a scheme of acceptable quality at this stage, which integrates appropriately within the surrounding context.
- 6.4 The proposal was presented to the Strategic Planning Committee on 24 January 2024. The comments are summarised below with the applicant response. Officer comments have been included where relevant.

Summary of SPC Comments and Response from Applicant – 24 January 2024	
SPC Comment	Applicant Response
Would like to see articulation and design of the scheme as the precedents are difficult to compare with the flat face blocks shown	The planning application drawings and supporting documents, including CGIs, demonstrate the high-quality articulation and design of the façade.
Opportunity to make a contribution to the estate and church from an aesthetic point of view	The proposed layout and form positively contributes to the surrounding grain taking into consideration the natural slope of the Site from north to south, Chippenham Road to Kings Lynn Drive, ensuring a balanced massing approach throughout with respect to the existing surrounding built form. The high-quality design, architecture and materiality will establish the buildings identity and its position within the street context and wider grain whilst achieving a modern finish.
Consideration should be given to improving parking provision and providing to the maximum standard	<p>Parking for the Proposed Development is within the London Plan and LBH maximum standards. The Site is PTAL 2 and given this, the London Plan maximum parking provisions apply.</p> <p>An overall maximum parking ratio of 0.8 spaces per home is therefore established. Within the Proposed Development, 44 car parking spaces are proposed, including 5 accessible parking spaces in line with requirements. The development has a parking ratio of 0.31 overall. Parking would be provided to the north and south of the Site, along Chippenham Road and Kings Lynn Drive in the form of perpendicular parking bays.</p>
Accessibility as buses appear to be at full capacity, what studies have been undertaken to understand bus usage and opportunities for public transport improvements.	The Transport Assessment (WSP, August 2024) identifies the estimated additional number of bus passenger trips in the AM and PM peak hours, presented in Table 7-6 in Section 7'. The results show and additional 8 bus passenger trips in the AM peak hour and 6 in the PM peak hour'.
What is the electric charging vehicles point provision and how	The London Plan requires residential development to provide 20% active provision plus 20% passive

<p>that would restrict non- charging car spaces within the site.</p> <p>Would it be possible to provide EV parking in addition to non- EV charging spaces</p> <p>Management plan for spaces required</p>	<p>provision for electric vehicle charging facilities and therefore, 8 active EV charging points will be provided on-site.</p>
<p>A question was raised to why there were not more larger homes within the proposal to reflect the Policy mix requirement</p>	<p>London Plan Policy H10 sets out that developments should generally consist of a range of sizes and does not set a prescriptive mix that developments are required to follow. Havering Local Plan Policy 5 requires developments to “reflect the recommended housing mix”.</p> <p>The development is considered to provide an appropriate mix of homes taking into account housing need and provision as justification in accordance with strategic and local policies. The Planning Statement sets out the key considerations in line within relevant planning policy, not least the unusual nature of the development as a wholly affordable scheme, that merits appropriate consideration in planning terms.</p>
<p>Would the development represent a high standard of housing?</p>	<p>The Proposed Development seeks to meet the London Plan requirements in order to deliver high quality housing, that considers the context and site characteristics. These requirements are similar to those set out within Policy 7 of the Havering Local Plan. They have been detailed below.</p> <ul style="list-style-type: none"> - Each residential home meets or exceeds relevant minimum space standards for housing including floor to ceiling heights. - All internal and external space standards are met. - The Proposed Development provides 78% dual and triple aspect homes. The layout has been optimised to maximise the provision of dual aspect dwellings through the use of gallery access and through- homes, with all family-sized homes either dual or triple aspect. - The built form, massing and height of the development has sought to be development through consideration of the surrounding context. The design of the residential dwellings seeks to maximise the privacy and adequate daylight for residents, whilst being informed by robust sustainability and overheating assessments to help meet the challenges of climate change. In addition, the layout of the scheme has considered how to reduce noise from common areas to individual dwellings.

	<ul style="list-style-type: none"> - Furthermore, generous and high-quality communal amenity spaces have been designed to be accessible from all dwellings, appropriately sized to meet residents' needs. - The proposals have maximised the active frontages on the Site and deliver clear and convenient routes with a feeling of safety, that is legible and defined for street users. - The application is accompanied by a Daylight and Sunlight Report, prepared by Delva Patman Redler, which considers the daylight and sunlight amenity available to the newly proposed accommodation, as well as overshadowing to the identified amenity areas, within the Proposed Development. The report confirms that acceptable levels of internal daylight and sunlight are achieved within the development. In addition, at least 50% of the external amenity spaces would achieve 2 hours of sunlight on 21st March in accordance with BRE guidelines and therefore will enjoy good levels of sunlight and limited overshadowing. Play spaces have been designed to make best use of sunny parts of the Site, whilst also allowing for some more shaded spaces. - The scheme seeks to deliver high quality amenity standards, for private, communal and child play spaces. Amenity and open space are both core aspects of the proposals and the landscaping strategy proposes both a community garden and child-friendly spaces, ensuring there is a range of play options across the development. The proposals include 1,248 sqm of external play space, in line with the requirements of London Plan Play Space Calculation based on 10 sqm per child. - In terms of impacts, on surrounding properties, this is considered in greater detail in the Daylight and Sunlight section of this report. However, existing receptors benefit from a significant level of light given the Sites' more limited development, and there would be in limited cases a high degree of change to daylight levels. Those homes that are affected are all dual aspect, with alternative outlooks, and would still receive good levels of daylight and sunlight given the degree of change to optimise the development of the Site.
<p><u>Officer Comment:</u></p> <p>The data shown in the DLSL report regarding the existing levels and resultant levels are accepted. However, the conclusions regarding existing properties that face the site is not agreed which will be set out in the amenity section of the report below.</p>	
<p>What are the car parking levels during the day?</p>	<p>On-street parking surveys were undertaken within a 200m walking distance of the Site on Tuesday 17</p>

	<p>October 2023 and Wednesday 18 October 2023 between 12.30am and 5:00am, in accordance with the Lambeth survey methodology for residential parking surveys, the industry best practice.</p> <p>Daytime parking surveys were not undertaken as part of the Chippenham Road Transport Assessment (WSP, August 2024) as the peak parking demand for residential parking will be at nighttime when residents are home. During the daytime availability of parking on street would therefore be greater.</p>
<p><u>Officer Comment:</u></p> <p>Both TfL and the Highways Authority have no fundamental objection to the proposal. The site is well connected to shops and local services. A car club space is shown to be within the site and can be secured by S106 legal agreement.</p>	
<p>Where do the service vehicles park given the narrowness of Dartfields and King's Lynn Drive?</p>	<p>On nominated collection days, the Refuse Collection Vehicle (RCV) will park adjacent to each waste store and LBH's waste collection operatives will collect bins directly from the waste store at ground floor level. The vehicles would only stop briefly to collect waste which will have limited if any impact on traffic movements.</p>
<p><u>Officer Comment:</u></p> <p>No fundamental objection raised by the Highway Authority. A Delivery and Servicing Management Plan can be secured by planning condition.</p>	
<p>Would care leavers have 24 hour on site supervision?</p>	<p>Care leavers' accommodation will be for those young people who are transitioning out of the care system within the Borough. The accommodation is typically a supportive environment with enhanced security and carers on Site 24 hours daily.</p>
<p>Would the care leavers be grouped or pepper potted?</p>	<p>The 22 care leavers accommodation units would be grouped together in core 1 within Block A2.</p>
<p>What would be the ages of the care leavers? Would there be problems with grouping care leavers together?</p> <p>Concern over ASB, noise and disturbance.</p>	<p>Care leavers would typically be 18 years old. The accommodation is typically a supportive environment with enhanced security and carers on Site 24 hours a day</p>
<p>Where would waste be stored and collected from?</p>	<p>Residents will be responsible for transferring waste from their units to the dedicated waste stores. Blocks A1, B1 and B2 each have a single communal waste store. Block A2 will have two separate waste storage areas: one in Core 1 serving the care leavers accommodation and the other in Core 2 for the other</p>

	residential units.
Where would mobility scooters be stored?	The proposals do not include a parking area for mobility scooters. There could be an option to omit some cycle spaces if unused to make space for mobility scooter parking if needed, however this would need to be reviewed to ensure no implications on the fire strategy or rating of the space. The provision of storage for any mobility scooters would be addressed by the management team.
Clarification that lifts are sufficient size	The 8 person's lifts have internal car dimension of 1400x1100, with a 900mm door opening width. These are sufficiently sized to meet the needs of the development.
Would like to see details for cycle parking within the development	<p>Cycle parking will be provided for all uses in line with the standards set out in London Plan Policy T5 which are reiterated in the LBH local plan.</p> <p>Long stay cycle stores will be located at ground floor level in Blocks A1 and B1 which would be accessed via Chippenham Road. Long stay cycle stores will be located at lower ground floor level in Blocks A2 and B2 and would be accessed via Dartfields (West) and Dartfields (East). The housing for young people requiring care will all be provided in Building A2 and will have a separate long-stay cycle store from the affordable homes in Block A2.</p>
<p><u>Officer Comment:</u></p> <p>It is noted that the long stay spaces have been designed with regard to TfL's London Cycling Design Standards and proposes a mix comprising 80% two tier stands, 15% Standard Sheffield stands and 5% Accessible Sheffield stands.</p>	
Would like to see more details on disabled access and movements within the site.	<p>The proposal includes 14 accessible homes (scaled to accord with Building Regulations Part M4(3)). This equates to an overall provision of 10% accessible homes within the Proposed Development. They would comprise a mixture of 2-bedroom homes.</p> <p>The accessible homes would be a mixture of 2 bed 3 person homes and 2 bed 4 person homes across Block A1 (9 homes) and Block B1 (5 homes). Both blocks containing the accessible homes would face onto Chippenham Road providing level access, avoiding the level change within the Site. All users, including wheelchair users, would have access to the communal courtyards associated with their respective blocks.</p>

<p>District heating scheme should be cost effective and efficient for all residents</p>	<p>The proposal has considered and minimised the costs to occupants by prioritising demand reduction measures.</p> <p>A Heat and Maintenance Cost Estimate has been prepared which demonstrates that occupiers will likely not pay more for their heat than they would from a gas fired boiler.</p> <p>Although the site heat network operator is not known at this point, the applicant aims to select an operator who is Heat Trust registered with appropriate quality assurance measures in place.</p>
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Community and Stakeholder Engagement

- 6.5 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:

Publicising Stage 1 Consultation

- A promotional leaflet was issued to neighbours closest to the site on Tuesday 4th July 2023, providing residents with two weeks' notice of the consultation and exhibition.
- Thursday 13th July, a press release was issued to local media detailing the proposals and promoting the consultation
- The website (<https://www.havering.gov.uk/haroldhilltowncentre>) acted as the main hub of the consultation and included information about the regeneration plans. It also offered details on how to provide feedback, including a dedicated feedback form.

Stage 1 Consultation - Tuesday 18th July and Monday 8th August 2023

- Public Exhibitions held at Harold Hill Library on Tuesday 18th July and Thursday 20th July.

Publicising Stage 2 Consultation

- 105 leaflets promoting the consultation was issued to residents living in close proximity to the proposed site. The leaflet contained a brief summary of the plans and shared mechanisms for providing feedback, as well as highlighting the exhibition event and duration of the consultation period.
- A press release was issued to local media detailing the proposals and promoting the consultation on Monday 15th April. The update was shared on the Havering Council news pages online, as well as in the 'Daily Digest' Bulletin.
- The Romford Recorder and Havering Daily covered the release
- The consultation was publicised on Havering Council's social media channels via updates in the Living in Havering e-bulletin. Featuring in both the Friday 12 and Friday 19 April editions, which were posted on the Council's social media, including X (formerly known as Twitter) and Facebook.

Stage 2 Consultation - Monday 15th April to Friday 10th May 2024

- The public attended events were held on Thursday 25th April and Saturday 27th April, both at the Harold Hill Library. A 3D model of the Town Centre was also displayed in the centre of the room.
- The Council's website acted as the main hub of the consultation and was updated to include more in-depth information about Phase Two of the regeneration plans.
- A Community Information Line was provided throughout the course of the consultation, to enable people to speak with members of the development team directly. Interested parties were able to ask questions, leave their feedback verbally, or request paper copies of the consultation materials to be posted to them. The telephone line was available at the start of the consultation and was staffed from 9.00am to 5.30pm, Monday to Friday. An answerphone facility was available outside of office hours.

6.6 A total of 73 pieces of feedback were received during the public consultation.

6.7 The applicant's response to the issues raised during the Stage 1 public engagement contained in the SCI is as follows:

How will local roads be affected?

The proposals do not include a significant increase in on-site parking, with the existing car parking having provision for approximately 40 parking spaces. Where parking spaces are proposed on-site (44 no.), dropped kerbs will be provided for cars to cross the footways, as existing along parts of Chippenham Road. Parking surveys have been undertaken to understand existing parking demand on-street. The parking survey results significant spare capacity, therefore sufficient parking is available on-street, if required.

Any plans must help tackle anti-social behaviour and help create a safe neighbourhood.

The Applicant's plans will significantly contribute to creating a safe neighbourhood. By using features such as well-placed windows, clear sightlines, adequate lighting, and strategically positioned public spaces, the environment makes it easier to monitor and address anti-social activity. When people can easily see and be seen, potential offenders are less likely to engage in unlawful behaviours due to the increased risk of detection. This can effectively 'design out' local crime. Additionally, creating communal spaces that support that sense of community within the development can encourage neighbours to look out for each other, further enhancing the overall safety of the area. Through careful consideration of design principles focused on security, the new development has the potential to contribute positively to the creation of a safe and welcoming neighbourhood for all its residents. The Applicant is targeting Secured by Design Silver as a minimum requirement for security on site, which will enable the Applicant to effectively 'design out crime'.

Affordable housing is a local priority

The scheme would bring forward 138 affordable homes as part of the plans.

Will there be an impact on local infrastructure, such as school places and availability of GP appointments?

The Applicant is undertaking an assessment of localised impacts that could arise from new dwellings in the area, particularly in relation to local infrastructure. The Applicant is committed to ensuring that any impacts are resolved and will work with other departments at the Council to deliver this.

The applicant's response to the issues raised during the Stage 2 public engagement contained in the SCI is as follows:

- The most frequently raised concern during the public consultation related to issues regarding the ability of local services, in relation to the homes proposed. Questions were asked on how nearby doctors' facilities would deal with an increase in the number of people residing in the area and suggestions made that the proposals would place additional pressure on local amenities.
- The Applicant, in respect of concerns over anti-social behaviour, will carefully consider how the redevelopment of the Chippenham Road site can work to reduce anti-social behaviour in Harold Hill and the surrounding areas. The scheme is targeting Secured by Design Silver as a minimum requirement for security on site, which will enable the Applicant to effectively 'design out crime'. This is achieved through certain design standards like robust doors, secure windows and effective locks. The SBD Silver also considers the design of the environment around the building, including aspects like lighting, landscaping, and surveillance. The Applicant will ensure that entry to the courtyards is provided via fob access, and that these are private spaces for residents only.
- It is recognised that concerns have been raised regarding the impact of the development on local highways. It is anticipated a detailed Transport Assessment and parking plan as part of the planning application, would consider ways to minimise the potential impact of the development on the surrounding highway network. The data from these assessments will be used to calculate how many trips will be generated in the morning and evening peak hours. Not all households will have two cars and not all residents will travel from 8am to 9am and 5pm to 6pm due to differing work/shift patterns and the growing preference for flexible or home working.
- Two of the questions asked of residents focused on the use of the Alderman Pub and whether there would be support for the relocation of a family friendly licensed premises within the new development. Whilst the Applicant recognises concerns from some residents that the closure of the Alderman pub would lead to increased loneliness and a lack of social cohesion, the Applicant feels that the development offers ample facilities to help tackle this elsewhere.
- Within the open response feedback section, five respondents made suggestions on how to improve the scheme were received. These included:
 - Better provision for community seating
 - Free parking
 - Greater support for local businesses
 - Improved security measures for the community garden
 - Inclusion of a youth centre
 - Inclusion of a community police hub

7.0 CONSULTATION RESPONSE

7.1 A summary of the Statutory and Non-Statutory consultation responses received along with the Officer comments are below:

Consultee	Response
Anglian Water	No comments as the site is outside their sewerage boundary. They will only comment on drainage/surface water within their boundaries.

Health and Safety Executive (HSE):	No comments as the height condition for a relevant building is not met. The proposed development does not fall under the remit of Planning Gateway One.
Active Travel England:	No comments as the development does not meet the statutory thresholds for consideration.
Thames Water:	<p><u>Waste Comments:</u></p> <ul style="list-style-type: none"> • Public sewers are close to the development. Measures should be taken to minimize the risk of damage. • A Groundwater Risk Management Permit is required for discharging groundwater into a public sewer. • Petrol/oil interceptors should be fitted in all car parking/washing/repair facilities. <p><u>Surface Water Comments:</u></p> <ul style="list-style-type: none"> • Follow the sequential approach to the disposal of surface water. • Prior approval from Thames Water Developer Services is required for discharging to a public sewer. <p><u>Water Supply:</u></p> <ul style="list-style-type: none"> • The area is supplied by the Essex and Suffolk Water Company.
Lead Local Flood Authority:	No comments.
Street Naming and Numbering:	The application will require street naming and numbering.
NATS Safeguarding:	<p>No safeguarding objection.</p> <ul style="list-style-type: none"> • The proposed development does not conflict with their safeguarding criteria.
Arqiva:	<p>No objection regarding radio transmission links.</p> <ul style="list-style-type: none"> • They ensure the integrity of Re-Broadcast Links and have no concerns about the development's impact on their operations.
LBH Education:	<p>Financial contributions are required for additional school places due to the expected child yield from the development.</p> <p><u>Pupil Yield from Development:</u> Early Years: 11 children Primary: 42 children Secondary: 22 children Post-16: 9 students SEND: 1 pupil</p> <p>The following contributions are necessary to create additional school places and meet future educational needs:</p> <p>Secondary: 22 @ £27,818 = £611,996 Send: 1 @ £118,621 = £118,621 Total contribution sought: <u>£730,617</u></p>

Historic England:	No objection subject to two archaeological conditions for fieldwork and public engagement. The site is historically significant, with potential for archaeological remains. An archaeological evaluation and public engagement program are necessary.
LBH Waste Management	No objection <ul style="list-style-type: none"> • Emphasises the need for suitable waste collection and storage facilities. • Guidelines provided for residential, commercial, and mixed-use developments. • Waste storage areas must be accessible and comply with relevant regulations.
London Fire Brigade (Fire Safety)	No objection <ul style="list-style-type: none"> • If there are any deviations to Brigade access and facilities then this information needs to be provided to Fire Safety Regulation (FSR-AdminSupport@london-fire.gov.uk) to review the proposed provision.
London Fire Brigade (Water)	No objection <ul style="list-style-type: none"> • Requires the installation of a new fire hydrant. • Fire safety and access requirements must be met. • Detailed guidance provided on access requirements for fire appliances and the installation of fire hydrants.
Place Services - Ecology	No objection <ul style="list-style-type: none"> • Recommends a Biodiversity Gain Plan is secured by 106 Conditions relating to: <ul style="list-style-type: none"> • To accord with Ecological Appraisal • Submission of CEMP for biodiversity • Habitat Management and Monitoring Plan (HMMP) • Biodiversity Enhancement Strategy • Wildlife Sensitive Lighting Design Scheme
Transport for London (TfL):	No objection in principle <ul style="list-style-type: none"> • Comments on car parking, cycle parking, active travel zone assessment, trip generation, delivery and servicing, and construction logistics. • Emphasises the need for a car-lite development. • Appropriate cycle parking and improvements to active travel routes are necessary. • A Parking Design and Management Plan should be conditioned. • A full delivery and servicing plan and a Construction Logistics Plan should be secured by condition.
Metropolitan Police	No objection in principle <ul style="list-style-type: none"> • Recommends Secured by Design (SBD) measures and conditions to ensure safety and security for public and semi-public realms, boundary treatments, lighting, CCTV, communal entrances and emergency access.

	<ul style="list-style-type: none"> • Emphasises the importance of designing out crime and ensuring the development is safe and secure for residents. • Specific concerns include clear signage, rule setting, external visitor cycle parking, boundary treatment, lighting, CCTV, communal entrances, emergency access, and compartmentation.
LBH Environmental Health	<p>No objections on land contamination or air quality grounds</p> <ul style="list-style-type: none"> • Recommends conditions for addressing potential contamination and managing dust during construction. This is to ensure the development is suitable for residential use and does not pose a risk to human health.
LBH Highways	<p>No objection in principle</p> <ul style="list-style-type: none"> • The applicant has provided an Active Travel Zone assessment. This demonstrated key routes and the potential for improvement. Given the increase in the number of vehicles in the area active travel measures should be considered. • The proposed layout of the car parking appears to create a car-dominant fronting Chippenham Road and Kings Lynn Drive, however, it is noted to be low speed roads with existing vehicles parked on the carriageway. Given there is a number of lengthy vehicle crossovers which have established a relationship with pedestrians and vehicles there are no significant concerns to the layout. • The vehicle parking spaces provided should be allocated to specific units within the development. • The level of Blue badge and Electric Charging parking spaces provided are acceptable. • In respect of cycle parking it is considered the quantum of proposed spaces is acceptable. It meets the minimum standards of Policy T5 in the London Plan. • The development proposals will generate additional deliveries and servicing trips and these should be properly accommodated within the development. • The demolition and construction works and particularly deliveries may cause disruption to the free-flow of traffic and prejudice road safety. A Demolition and Construction Traffic Management Statement/Plan should be secured by Condition • The parking bays at the northeast part of the site, will need to be stopped up to enable for this development. • The vehicular access should be laid out and constructed in accordance with the London Borough of Havering construction specification. Surface water from private roads/driveways areas must not discharge onto the public highway, and appropriate intervention must be provided. • Following any granting of permission it will be necessary for the development team to enter into an agreement with the Council as the Highway Authority to progress the required alterations to the Highway. The form of the agreement will be under section 278 of the Highways Act 1980 (Section 278 Agreement).

<p>Place Services - Landscape</p>	<p>No objection in principle</p> <ul style="list-style-type: none"> • A Block A1 Proposals – Materiality (January 2025) plan has been submitted with information on the Boundary Proposals. We are satisfied with the information included within this submitted document. • Details of proposed cut and fill will need to be submitted owed to the varied topography and retaining walls across the site. • Raingarden mixes are included and proposed within the submitted Planting Plans. We support the inclusion of raingardens within the submitted proposals and therefore advise the SuDS Strategy is updated to reflect this. • Trees are located within close proximity to proposed hard landscaping. We therefore advise that details of tree pits are submitted for review. • Species information and mixes should be included on future submissions for the proposed green roof. • Any proposed hedgerows should be accompanied by a 3/2-strand wire and timber post fence. The fence should be erected through the centre of the staggered row of hedge to prevent access through the site by pedestrians until the hedge is fully established. • The scheme requires the removal of a large number of trees which impacts the sense of maturity of the proposed scheme, and therefore the size of the proposed trees should be a primary consideration within the proposed design. As a minimum and as provided, 10-12cm should be used, however a number of trees should also be larger where the location allows to provide a sense of maturity to the scheme.
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8.0 LOCAL REPRESENTATION

- 8.1 The application was advertised via a Press Notice and Site Notice displayed at the site for 21 days.
- 8.2 A total of 176 notification letters were sent to neighbouring properties regarding this application.
- 8.3 14 neighbour representations raising an objection have been received via the Council's consultation process.
- 8.4 The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the next section of this report:
- Harold Hill is becoming saturated with flats, houses led or decent flats should be a priority in regeneration;
 - Traffic is on an increase and difficulties with parking capacity because of the number of flats
 - Who would be allocated the proposed flats?
 - Infrastructure needed to support the level of development

Loss of The Alderman

- **Loss of Community Facility:** The public house is highlighted as a vital local community facility that serves as a sanctuary for individuals who may feel isolated, such as those living alone or experiencing anxiety. It is noted for fostering social connections and providing a safe space for patrons, including elderly individuals and their caregivers. Its demolition would deprive local residents and workers of an important informal meeting place, as there are no similar alternatives within a mile.
- **Heritage and Historical Value:** The Alderman PH has historical significance, being named after Alderman A.J. Dyer, who was a prominent figure in the local licensed trade. The public house's heritage value is emphasised, and its loss would mean a notable aspect of local history would be lost.
- **Economic Viability:** Stonegate Group asserts that the public house is a fully functional and viable operation, contributing to the local economy and providing employment. The pub is currently operational and profitable, with a strong customer base of about 80-100 regulars who visit weekly. The letter emphasizes that there is little local competition, with the nearest pub being over a mile away, suggesting that there is a realistic prospect for the pub to continue operating successfully within the large group chain. The demolition would result in job losses for the six staff members employed at the pub, as well as potential housing issues for the landlady and her partner, who live on-site. This aspect underscores the economic implications of the proposed demolition.

Other matters:

- Other representations received draw attention that 10 Rothbury House is private ownership, subject to court cases and alleging the Council has not followed relevant policy and procedures relating to the purchase of said property.

8.5 **Officer Response:** In regard to the proposed loss of The Alderman this is considered in this report. The comments made in regard to 10 Rothbury House is a civil matter between interest parties and the Council.

9.0 RELEVANT POLICIES

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

National Planning Policy Framework (2024)

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 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 Policies

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- 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
- HC7 Protecting Public Houses
- S4 Play and informal recreation
- 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

London Plan Guidance

- Accessible London SPG
- Planning for Equality and Diversity in London SPG

- Characterisation and Growth Strategy LPG
- Optimising Site Capacity: A Design-led Approach LPG
- Small Site Design Codes LPG
- Housing Design Standards LPG
- Public London Charter LPG
- Fire safety LPG (draft)
- Affordable Housing LPG (draft - May 2023)
- Development Viability LPG (draft - May 2023)
- Affordable Housing and Viability SPG (August 2017)
- Housing SPG
- Play and Informal Recreation SPG
- Social Infrastructure SPG
- Preparing Borough Tree and Woodland Strategies SPG
- Urban greening factor LPG (February 2023)
- Air quality positive LPG
- Air quality neutral LPG
- Be Seen energy monitoring LPG
- Circular economy statements LPG
- Energy Planning Guidance
- The control of dust and emissions in construction SPG
- Whole life carbon LPG
- Sustainable Transport, Walking and Cycling LPG

Havering Local Plan (2021)

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)

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).

10.0 MATERIAL PLANNING CONSIDERATIONS

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

- Principle of the Development
- Affordable Housing and Housing Mix
- Standard of Design, Layout, and Impact on Views
- Secure by Design
- Residential Amenity
- Highway Matters
- Sustainability and Energy Efficiency
- Fire Safety
- Ecology and Biodiversity
- Flood Risk, Drainage and Urban Green Factor
- Environmental Issues
- Sustainable Waste Management
- Accessibility and Inclusivity
- Financial and Other Mitigation

Principle of Development

10.1 The proposed redevelopment of the site comprises the demolition of existing housing, a two-storey building for the use as a housing office and The Alderman Public House. This section will consider these in turn before moving to the principle of the proposed housing.

Loss of existing homes

10.2 London Plan Policy H8 addresses the loss of existing housing and estate redevelopment. It mandates that any loss of existing housing should be replaced with new housing at existing or higher densities, ensuring at least the equivalent level of overall floorspace. This policy ensures that redevelopment projects do not reduce the availability of affordable housing and encourages an increase in such housing where possible. Specifically, the policy requires that:

- Before considering demolition, alternative options should be evaluated, weighing potential benefits against social and environmental impacts.
- Demolition of affordable housing is not permitted unless it is replaced by an equivalent amount of affordable housing floorspace.
- All proposals involving the demolition and replacement of affordable housing must follow the Viability Tested Route and aim to provide an increase in affordable housing beyond the replacement floorspace.

10.1 The Design and Access Statement (DAS) has considered the existing housing within the site and explored options for retention of the buildings.

10.2 The existing housing on the site has been surveyed and has been identified that there is no step free access to the properties, they are poorly insulated with a low internal floor to ceiling height and are a low density of housing provision on the site. The area of the existing homes have been shown to fall below current space standards advocated in the Nationally Described Space Standards (NDSS).

10.3 Three options have been explored using the ‘existing fabric’ of the building, refurbishment of the existing buildings (Option 1), refurbishment and extend the footprint of the buildings (Option 2) and relocating the core by extending the footprint of the building (Option 3). The table below provides a summary of the findings for each option (grey shading indicates it would not achieve the aim).

Option 1	Option 2	Option 3
Internal areas of homes meeting current standards	Internal areas of homes meeting current standards	Internal areas of homes meeting current standards
Compliant floor to ceiling heights	Compliant floor to ceiling heights	Compliant floor to ceiling heights
Future development and impact on masterplan	Future development and impact on masterplan	Future development and impact on masterplan
Housing mix, deliverability and site optimisation	Housing mix, deliverability and site optimisation	Housing mix, deliverability and site optimisation
Accessibility	Accessibility	Accessibility
Level of retention	Level of retention	Level of retention
Complexity of retention	Complexity of retention	Complexity of retention

10.4 The three options have shown that the retention of the existing homes would not achieve sufficient social and environmental benefits to warrant their retention. Furthermore, it is considered the retention of the existing housing would not achieve a keystone in the Local Plan to intensify and renew existing Council housing estates to provide an improved housing stock.

10.5 There would be an inevitable loss of 32 homes (24 flats and eight houses) on the site. However, it is proposed to erect 116 affordable homes (and an additional 22 care leavers homes) which would be built to comply with the NDSS Building Regulations and have a high performing insulating level. This would represent a significant net increase in the number of homes with a high standard of quality.

10.6 Given there is an increase in affordable floorspace which exceeds the replacement floorspace and that the scheme is wholly affordable housing it is not considered to require the scheme to follow the Viability Tested Route to demonstrate they have maximised the delivery of any additional affordable housing.

10.7 Indeed, while retention of the existing housing on the site would prevent greenhouse gas emissions arising from demolition this would not outweigh the social and environmental benefits the proposed development would bring. It is therefore considered London Plan Policy H8 has been satisfied and the loss of existing housing is acceptable.

Loss of non-residential uses

- 10.8 London Plan Policy E1 seeks to safeguard and promote office space as a vital employment-generating use, particularly in key areas such as the Central Activities Zone (CAZ), Canary Wharf, and other defined office clusters. In terms of loss of office space, the policy emphasises that office space should not be lost to other uses unless there is robust evidence that the site is no longer viable for office use. Where redevelopment occurs, the priority is to re-provide office space within mixed-use schemes to retain employment-generating potential. In areas however outside strategic office locations (e.g., CAZ or other identified clusters), loss of office space may be acceptable if it supports other priority uses (such as housing) and aligns with local planning policies. Local Plan Policy 19 directs office development to Romford Metropolitan Centre and the borough's district centres as part of mixed-use developments and does not seek to safeguard offices outside these areas.
- 10.9 The applicant asserts that the Council housing office has been vacant for three years and was surplus to the Council's requirements.
- 10.10 The demolition of the building and subsequent removal of the office use would facilitate the wider development to provide and deliver affordable housing for the area. It is therefore considered there are sufficient benefits to outweigh the loss of the office floorspace. As such London Plan Policy E1 has been satisfied.

Loss of The Alderman (public house)

- 10.11 The loss of a public house is considered under London Plan Policy HC7 which seeks to protect the operation of public houses. Part B of HC7 is relevant to this application where a public house has a heritage, cultural, economic or social value the application should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.
- 10.12 It has been identified through the representations that The Alderman has a value. Although it is difficult to conclude that there is a heritage or cultural value there is evidence to suggest that there is an economic and social value. No marketing has been undertaken and an interim use when taken in isolation would not necessarily accord with HC7. However, while the applicant would actively explore an alternative comparable provision (to replace the loss of The Alderman) it is recognised that the retention of the building would severely compromise the ability to regenerate the wider site. As such it is considered that the proposal to bring much needed affordable homes to the area would be a material consideration to weigh against the loss of The Alderman and the provisions of HC7.
- 10.13 It is acknowledged there are other benefits such as facilitating new affordable homes and care leavers which would help meet demand of the area/Borough. These matters alone however are not of sufficient weight to outweigh the loss of The Alderman.
- 10.14 Notwithstanding the applicant's assertion that there is no value associated with The Alderman, this is not accepted by Officers. A letter of intent has been submitted which amongst other things expresses a commitment to provide a replacement facility as part of Phase 1 of the forthcoming Farnham and Hilldene Estate development Phase III.
- 10.15 The Phase III of the Harold Hill regeneration scheme has not yet been submitted as a planning application. Given the social value of the public house officers have considered that in order to comply with the intentions of Policy HC7, and in the absence of marketing of the site, it is necessary for the application to include the re-provision of such a facility as part of the wider regeneration of the area in the adjacent District Centre. As such it is considered appropriate to secure an interim use and permanent replacement facility by way of a Legal Agreement or unilateral undertaking whichever is the appropriate legal

mechanism. This would ensure the applicant can set out a realistic timeframe and for sites to be identified given they would fall outside of the current application site.

- 10.16 When taking into account the securing provision of an interim use and permanent replacement space within the adjacent District Centre it is considered there is sufficient weight in the planning balance for the loss of this public house use, given the aims of HC7.

Proposed housing

- 10.17 The National Planning Policy Framework 2024 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.
- 10.18 Paragraph 60 of the National Planning Policy Framework (2024) supports the Government's objective of significantly boosting the supply of homes and explains the importance that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim for the local community should be to meet as much of an area's identified housing need including an appropriate mix of housing.
- 10.19 The Local Plan in its strategic approach provides comprehensive overarching key features to follow for the Borough. In respect of housing growth, a key feature looks to delivery at least 18,930 high quality homes over the plan period. A further keystone is to intensify and renew existing Council housing estates to provide an improved housing stock and an uplift of 700 additional homes. These principles are brought through in Policy H1 of the London Plan which sets a 10-year target for 12,850 homes to be delivered within the Borough.
- 10.20 This is carried forward at local level through Local Plan Policy 3 which seeks to maximise opportunities for delivering high-quality, sustainable and affordable homes within a variety of types and tenures.
- 10.21 On the 12th December 2024, the Government published the Housing Delivery Test result for 2023. The Housing Delivery Test Result for Havering for 2023 is 61%. In accordance with the NPPF the "Presumption" due to housing delivery therefore applies.
- 10.22 In terms of housing supply, based on the latest 2024 Housing Trajectory, Havering is able to demonstrate 3.4 years 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."

The Council is committed to an update of the Local Plan and this is set out in the Council's Local Development Scheme. Therefore, in the meantime whilst the position with regard to housing supply is uncertain, the "Presumption" due to housing supply is applied.

The Presumption refers to the tilted balance set out 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.

- 10.23 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 strong 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.
- 10.24 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.
- 10.25 Thus, the proposal for much needed 138 homes which are solely for affordable units, which importantly include specialist housing accommodation in the form of the care leavers accommodation would significantly assist in helping Havering achieve its housing target and is therefore supported.
- 10.26 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 would intensify the housing on the site which is within an existing Council housing estate and would uplift the number of homes. Full consideration of the specific issues raised by the development are undertaken below.

Affordable Housing and Housing Mix

- 10.31 The quantum of affordable housing proposed exceeds policy aspirations and provides a 100% affordable housing scheme which aligns with the overall aims of Local Plan Policy 4.
- 10.32 In respect of the tenure of the units it is understood the applicant is in discussion regarding grant funding with the GLA on the final tenure mix. The applicant is seeking to secure the homes as either London Affordable Rent or Social Rent within the S106 agreement, and will report the final products on completion of the development in line with standard monitoring requirements. Given that London Affordable Rent and Social Rent are both recognised in London Plan Policy H6, it is considered that either product would accord with policy requirements. As such the s106 Agreement can give the flexibility for either product which would ensure the proposal remains acceptable.
- 10.33 It is therefore considered that the range 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.

Unit Mix

- 10.34 The NPPF (2024) seeks to steer development to deliver a wider choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Policy H10 of the London Plan encourages new developments offer in a range of housing mix choices. The above policy stance is to allow Londoners a genuine

choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.

- 10.35 Local Plan Policy 5 states that ‘the Council will support development proposals that provide a mix of dwelling types, sizes and tenures’. All housing schemes should include a proportion of family sized homes and reflect the recommended housing mix identified in in the table below. 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. Policy 6 also supports the provision of specialist housing accommodation which this scheme importantly provides in the form of 22 care leavers units which would be highly unlikely to be provided through any other such housing development.

Housing Type	1 Bedroomed		2 Bedroomed		3 Bedroomed			4 Bedroomed
	1B1P	1B2P	2B3P	2B4P	3B4P	3B5P	3B5P	4B6P
Affordable	1	32	5	56	1	10	9	2
Care Leavers	---	22	---	---	---	---	---	---
Total	55		61		20			2

- 10.36 Whilst the proposals would not provide a fully policy compliant mix, it will still provide much needed specialist housing for young care leavers, a good proportion of 2 bed 4 person units as well as family units. It is recognised that the mix is a result of the need to take into account the greater development cost due to the site topography and the proposals being heavily reliant upon GLA funding in order to make the scheme economically viable.
- 10.37 Given the scheme provides much needed affordable housing and at a significantly higher level than would normally be achieved on other housing developments, it is considered that on balance the scheme would provide a good mix and choice of housing for those in most need within the Borough in accordance with the aims of Policy 4 and 5 of the Local Plan.

Standard of Design, Layout, and Impact on Views

- 10.38 The NPPF at paragraph 135 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 137 advocates that design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between the LPA, applicant and local community is encouraged about the design and style of emerging schemes. Paragraph 139 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.
- 10.39 London Plan Policy D3 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 London Plan Policy D4. Furthermore, the Policies 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.

- 10.40 Local Plan Policy 26 focuses on urban design, emphasising the importance of high-quality design in all new developments. It outlines criteria to ensure that developments are visually attractive, function well, and add to the overall quality of the area. Key considerations include responding to local character, creating safe and accessible environments, and promoting sustainable design principles. The policy also encourages early engagement with the community and stakeholders to achieve design excellence.
- 10.41 Given the proposed development does not exceed 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey London Plan Policy D9 is not material to this application.

Layout, Scale and Massing

- 10.42 It is considered the layout of the proposed development has taken account of the challenging topography of the site. Although forming a strong linear relationship with the surrounding streets the proposal promotes movement through direct, permeable, safe, and legible routes for residents. The gaps between building blocks allows light into the central garden spaces and add visual interest to the built form by creating views in and out of the central space.
- 10.43 The incorporation of landscaping, including existing and proposed trees, will help to soften the visual impact of the development. This greenery will provide a buffer that can partially obscure views of the buildings from certain angles, contributing to a more integrated appearance within the landscape.
- 10.44 The application is supported by a Townscape and Visual Impact Assessment (TVIA) which has evaluated long range views towards the site. The assessment identifies the proposed development is expected to be a prominent feature in long-range views due to its height and architectural design. The taller elements of the development, which rise to six storeys, will be noticeable against the existing suburban backdrop, particularly as viewers approach the site from the north. The assessment categorises the magnitude of change from long-range views as high, however, the resultant effect is considered to be minor beneficial, suggesting that the visibility of the development will positively enhance the character of the area.
- 10.45 In transitional views i.e. from the existing streets towards the site, it is designed to be contextual with the existing taller buildings in the area. This means that, although it will stand out, it will not appear out of place within the existing suburban character of Harold Hill. The scheme is considered to ensure that it maintains visual interest and architectural quality, enhancing the overall experience of the area.
- 10.46 The proposal represents a significant uplift in density within the largely low-rise existing context of Harold Hill. The location of the site adjacent to the District centre helps to manage the scale and massing in an appropriate way, with the scheme extending the more slightly urban character of Farnham Road further towards the south. The proposed massing then steps down towards Kings Lynn Drive to help stitch into the lower density suburban context on this side of the site.

Design and Materiality

- 10.47 The high standard of design helps to integrate the larger blocks into the surrounding context in a positive way. Careful attention to detail has been paid to elements such as brickwork, balcony/decks and metalwork. The strata effect of the brick, with different colours and

textures of bricks forming horizontal bands adds to the quality to the scheme and builds on the character of the Phase 1 Family Welcome Centre scheme on Hildene Road.

- 10.48 The form of the blocks allows external access decks to integrate into recessed spaces to help create a cohesive appearance. The colours and textures of the balcony/deck and canopy elements have been carefully considered alongside the brickwork to complement each other. Facades are well proportioned and elements such as window frames, doors and railings are well considered to help create a simple and elegant appearance.

Landscaping

- 10.49 The landscape strategy was a key focus of the pre-application process. The scheme complies with Policy G5 of the London Plan to achieve a minimum Urban Greening Factor score of 0.44, indicating a reasonable quality and quantity of planting has been achieved. During the pre-application process the footprint and parking layout was updated to help retain as many existing trees as possible.
- 10.50 The supporting DAS and Planning Statement characterises three principal areas of landscaping within which identifies soft planting, retaining structures and means of enclosure. The three character areas identified in the landscape design comprises residential gardens on the west and east side for block A and block B, a central community garden space and car park / front gardens.
- 10.51 The gardens include zones for natural play elements, community gardens, multi-use play and social areas, relaxing pockets, and terraced landscapes. Each zone is designed to serve specific functions, such as active play, social interaction, and relaxation, enhancing the overall community experience. Play areas, the zone/area in which they would be located and the size of each play area are shown for each age group.
- 10.52 The community garden includes features such as raised beds for gardening, a potting shed, a designated care-leaver garden, and spaces for social interaction and community events like markets and bake sales. It is intended for all residents, particularly focusing on fostering engagement among care-leavers and providing a space for residents aged 12 and up to grow plants, socialize, and participate in gardening activities. This inclusive design aims to strengthen community ties and promote active participation in gardening and social events.
- 10.53 It is considered in principle the proposal provides a series of high quality spaces that are easily accessible for new residents. The minimisation of tall boundary fences through the layout of blocks was discussed as part of the pre-application process. The nature of the site and the desire to create courtyard areas with access for residents only means that some areas of tall fences remain. The specification of fences will however need to be further reviewed at condition stages to ensure high quality standards and achieved to help mitigate any negative impacts associated with tall fences facing the street.
- 10.54 The proposal does not deliver biodiversity net gain objectives on site and there is a need to deliver 58 trees and 150m of hedge off site to deliver green infrastructure upgrades in the local area. This however is discussed later in this report.
- 10.55 Subject to the imposition of planning conditions it is considered the landscaping is acceptable. The final details of the landscaping across the site, how an existing tree which is proposed to be felled is incorporated into the scheme (discussed in more detail under the tree section of this report) and the means of enclosure can ensure the scheme is compliant with London Plan and Local Plan policies in respect of the treatment of the open spaces.

Children's Play Space

- 10.56 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.
- 10.57 The child yield for the proposal is approximately 118. The total play area provision would therefore amount to 1,128 sqm to be policy compliant. The applicant proposes to provide 1248 sqm in total distributed across the age groups which would satisfy policy requirements.
- 10.58 The playspace for Block A includes natural play elements, balancing beams, play slides, sensory educational panels, and climbing structures. It is designed for various age groups, providing opportunities for climbing, balancing, jumping, and socializing, while also incorporating educational features like insect hotels and play tables for interactive learning. The space is structured into sections for social interaction, regimented play, and a forest school environment, ensuring a diverse and engaging experience for residents. Block B differs as it includes a play trail, stepping logs, and a micro basketball court, focusing on community social spaces and natural play elements, while Block A emphasizes sensory educational panels and structured play equipment. Both spaces are designed to encourage physical activity, social interaction, and educational opportunities, but Block B specifically caters to a more communal and varied play experience.
- 10.59 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.

Quality of residential accommodation

- 10.60 London Plan Policy D6 states that inter alia 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.
- 10.61 The proposed layouts create a high proportion of dual aspect units and avoids single aspect north or south facing units. A large proportion of homes are through-units with windows to the front and rear, to help maximise passive ventilation and daylight. Achieving daylight and sunlight is discussed in more detail under the amenity section of the report. The proposed homes would have a good standard of daylight.
- 10.62 Maisonette units to lower floors help to create a positive relationship with the street and front doors help to activate ground floor frontages. Secondary floors above/ street level help to provide greater privacy for residents as well as access to rear garden/terrace areas. Although there remains a close relationship and similar levels between the private amenity space for units A1.01.03 and A1.01.04 with Dartfield's footway the level of privacy can be mitigated by an appropriate means of enclosure. While additional has been provided by the

Applicant in this respect, further exploration is needed and can be dealt with by way of planning condition.

- 10.63 Internal spaces are well proportioned, meeting minimum floor to ceiling heights and comply with minimum space standards set out in the London Plan. Level access is provided for all residents, and all wheelchair units are accessed from Chippenham Road to avoid the need to navigate steep hills to access the town centre.
- 10.64 In respect of the private outside space the homes which benefit from a balcony meeting the standard set out in the London Plan required in terms of size and dimension.
- 10.65 Overall, in terms of design, it is considered that the proposals have been carefully considered and subject to the conditions outlined above, the proposal achieves a design which serve to enhance the character of the buildings and the surrounding area. As such the scheme is considered acceptable in respect of design.

Secure by Design

- 10.66 The scheme has been designed with a good level of passive surveillance over public areas and parking bays while providing defensible spaces to ground floor terraces and private gardens. Communal entrance points have been designed with secure lobbies and two separate doors to mitigate tailgating with refuse and cycle stores having access control and management strategies to reduce anti-social behaviour. The external communal areas benefit from 1.8 metre high fencing preventing unfettered access from the public realm and are proposed to be illuminated to maintain good visibility at night. The scheme is supported by the designing out crime officer subject to conditions to ensure the scheme satisfies London Plan Policy D11 and Local Plan Policy 26.

Residential Amenity

- 10.67 NPPF paragraph 135 (criterion f) emphasises the importance of well-designed places and their impact on amenity. In relation to amenity, it highlights that new developments should ensure a high standard of amenity for existing and future occupants.
- 10.68 Policy D3 focuses on achieving high-quality, well-designed places by ensuring developments respond to their context and optimise site capacity. In respect of amenity, the policy highlights that development proposals should deliver appropriate outlook, privacy and amenity. London Plan Policy D6 states that inter alia buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy, overshadowing, wind and microclimate.
- 10.69 Local Plan Policy 7 focuses on residential design and amenity. This policy outlines the standards and principles that residential developments must adhere to in order to ensure high-quality living environments for residents. In respect of this section of the consideration of the proposal Policy 7 purports developments should protect and enhance the amenity of existing and future residents which includes privacy, daylight, sunlight, and outlook.
- 10.70 The Building Research Establishment (BRE) guidance "*Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice*" provides best practice recommendations for assessing the impact of new developments on natural light access for both existing and proposed buildings and assessment against the BRE methodology is expected as set out in Policy 7. The guidance sets out a methodology for assessing the vertical sky component

and sunlight assessment within habitable rooms to understand the amount of daylight and sunlight afforded to these spaces.

Future occupiers

- 10.71 In respect of meeting the required lux levels within the development 409 rooms were assessed where it was found that 365 (89%) would achieve the minimum BRE target values. In the new rooms where levels fell short (44), there would still be good levels of daylight in the areas closest to the windows serving them. Of the 44 rooms the majority of the rooms achieving in excess of 150 lux to the front portion of the rooms and/or the unit will be very well lit in overall terms.
- 10.72 Taking into account that windows facing within 90° of due south are considered for sunlight assessment 199 windows of the 219 relevant windows for assessment (91%) will meet the minimum BRE criteria.
- 10.73 Turning to the amenity areas it was found that 78% would meet the BRE guidance in achieving the two-hour sun on the ground taken on 21st March. The areas where a shortfall occurs is adjacent to the inside elevation of Block A1 and the northern side of Block B2. Although the reduced sunlight level area adjacent Block A1 would shade all the play space, this would have benefits in keeping children out of the majority of direct sunlight when in use. The area adjacent Block B2 is soft landscaped and has seating for residents, however, there are other opportunities within the wider space for residents to be in sunny parts, thus giving choice in the garden space of where to reside.
- 10.74 In conclusion, 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 the amenity areas, the scheme has been designed to achieve appropriate conditions given the topography of the site.

Surrounding buildings / land uses to the site

- 10.75 All the properties which face the application site have been carefully assessed. While there are impacts it is considered the reductions to light and retained levels are within BRE tolerances. As such, Officers are of the view that the impact on these neighbouring properties would not result in a significant adverse impact on the amenity of the occupiers, with the exception of properties 126, 128, 130, 132 Dartfields which are discussed below.

No. 126, 128, 130, 132 Dartfields

- 10.76 The Daylight / Sunlight assessment identifies that the front of these properties would experience significant reductions in and retained levels of light which fall below the BRE Guidance. This would result in the properties experiencing a noticeable loss of light to the habitable rooms at the front of the properties making these rooms gloomier and increasing the need for the use of electric lighting.

Outlook

- 10.77 It is considered the combination of the overall height of the six storey block opposite these two storey properties at a distance of 22m is such that the building would loom large and have an adverse impact in particular on the outlook of the occupiers of Nos 126 to 132 (evens) Dartfields from their front facing habitable rooms, thus having an overbearing impact to the detriment of the amenity enjoyed by the residents.

Conclusion

- 10.78 Officers as set out above consider there to be an adverse impact in terms of light to the front habitable rooms and outlook from these rooms of the properties on Dartfields set out above. It is recognised that these are houses with rear facing rooms unaffected by the proposed development. However, the losses to what are likely to be main living areas and bedrooms is significant and would have an adverse impact upon those occupiers. This adverse impact on residential amenity from the proposed development will be considered towards the end of this report in the planning balance.

Highway Matters

- 10.79 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 T6.1 relates to parking standards.
- 10.80 Local Plan policies 23 and 24 seek support development which ensures safe and efficient use of the highway and demonstrates that adverse impacts on the transport network are avoided or, where necessary, mitigated and reinforce the aims of London Plan policy T4, which aims to contribute to modal shift through the application of parking standards and implementation of a Travel Plan.
- 10.81 The application is accompanied by a Transport Assessment (TA) and Travel Plan. 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.
- 10.82 The PTAL rating of the application site is 2, indicating poor public transport accessibility. However, the site is located in an area with good accessibility to amenities and green spaces including being adjacent to the Harold Hill District Centre with well-connected network of footways and cycle routes. There are bus services on Hilldene Avenue and Gooshays Drive, which includes routes 174, 256, 346, 499, 608 (school service), and 656 (school service) connecting to the Harold Hill area. Additionally, bus stops on Farringdon Avenue via Dulverton Road from the site are served by route 496 and school bus service 656. There is access to the Elizabeth Line from the site, as Harold Wood station is approximately 1.7 km away, reachable by local bus routes 256 and 294, a 26-minute walk or a 7-minute cycle.

Trip generation and traffic

- 10.83 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. 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.

Access

- 10.84 Pedestrians can access the buildings from the street via footways that border the site on Chippenham Road, Dartfields, and Kings Lynn Drive, providing good accessibility. Although the streets are generally level, but some areas may have unlevelled paving or broken slabs that need repair. The main entrance for each block is located on the corner to improve the visibility with street facing doors to promote active frontages. The entrance is sheltered and has a controlled access lobby with internal resident post boxes.
- 10.85 Two further entrances form part of the proposal which would serve the duplex properties with front doors facing the street and galley / deck access for the upper floors. The duplexes are designed with a defensible front garden space and sheltered by the first-floor deck access platform. Benches are included on the galley access and sheltered by the respective above deck galley. The duplexes and apartments facing the galley access have been designed for kitchens to face the street/access with more private space of the homes rear facing.
- 10.86 As the proposed parking bays are around the perimeter of the site vehicles have direct access Chippenham Road and Kings Lynn Drive. Crossover points will be installed to allow vehicles to overrun the footway. Emergency vehicles access can be taken from all sides.
- 10.87 It is considered the access for pedestrians and vehicles is acceptable. Although TfL have commented on the length of the dropped kerb the speed of the road and street visibility has been considered to not pose a risk to highway safety by the Council's Highway Officer.

Vehicular Parking

- 10.88 Existing parking around the site includes on-street parking with unrestricted spaces on Chippenham Road, Dartfields, and Kings Lynn Drive, along with permit holder bays in the HH1 controlled parking zone. There are 10 perpendicular car parking spaces fronting Chippenham Road and 40 spaces in the on-site car park accessed via Kings Lynn Drive.
- 10.89 The outcome of the parking surveys on the existing streets indicated that there is spare parking capacity across the survey area, with approximately 72 spaces (52% of total on-street parking spaces) unoccupied. Specifically, there were about 16 available parking spaces on Kings Lynn Drive and approximately 56 on Dartfields. Taking into account the proposed car parking layout, it will result in the removal of four unrestricted parking bays on the south side of Chippenham Road, west of the junction with West Dene Drive, and nine unrestricted parking bays on the north side of Kings Lynn Drive, west of the junction with Dartfields (East). However, it is considered the existing street capacity to still be able to accommodate existing and proposed street parking and would not be a matter to sustain a refusal.
- 10.90 The development could provide a maximum of 110 car parking spaces in line with the London Plan maximum parking standards for the proposed residential unit mix. This is based on the maximum parking ratios of 0.75 spaces for 1-bed and 2-bed units, and 1 space for 3-bed and 4-bed units. This would equate to the overall maximum parking ratio is at 0.8 spaces per residential unit.
- 10.91 The proposed parking ratio based on the development is approximately 0.31 spaces per residential unit, calculated from the 43 proposed parking spaces for 138 residential units. It is proposed to provide 3% active provision for the accessible parking, which based on the

number of homes would result in a minimum of four Blue Badge space would be required. However, five bays are provided.

- 10.92 The development proposals include the provision of a car club space within the site on the north side facing Chippenham Road. This is included within the Legal Agreement or unilateral undertaking whichever is the appropriate legal mechanism to ensure that it is secured and delivered.
- 10.93 It is considered the proposal in respect to the scheme being 100% affordable and including 22 care leavers units the effect on existing street provision and proposed on-site parking is acceptable.

Electric vehicles

- 10.94 The proposal includes the installation of eight active electric vehicle (EV) charging points, which meets the London Plan Policy T6.1 requirement of providing EV charging points for 20% of parking spaces. Additionally, there will be passive provision for the remaining 80% of parking spaces to accommodate future EV charging needs. This aligns with local and regional policies aimed at promoting sustainable transport options.
- 10.95 The proposed development will provide eight active EV charging points for 20% of the parking spaces, in accordance with the London Plan requirements. Additionally, there will be passive provision for the remaining 80% of parking spaces. The overall parking layout will also include accessible parking spaces, ensuring compliance with local regulations.
- 10.96 The specific locations of the electric vehicle charging points on-site are not detailed, however, they can be integrated into the proposed car parking layout with the details secured by planning condition.

Cycle Parking

- 10.97 A total of 264 long stay and 16 short stay cycle parking bays are proposed for the development, which exceeds the London Plan minimum cycle parking standards. The provision is distributed within the four blocks across the site and comprises a mix of two tier stands, Sheffield stands and accessible Sheffield Stands long-stay. The short-stay spaces are in two locations comprising four short stay cycle parking stands (8 short-stay spaces) each next to Building A2 and Building B2.
- 10.98 It is noted that TfL has recommended that all cycle stores are accessed through the residential lobby of their block. This is to ensure that the cyclist can wait and challenge anyone tailgating in the semi-public space before entering the cycle store. Although The Met Police have raised no objection in principle there are recommendations set out in the response which if addressed would assist in gaining SBD accreditation and achieve the same objective as TfL. The measures purported by The Met Police would indeed increase the safety and security for residents (such as CCTV, lighting and security rated LPS 1175 SR2 external doors).
- 10.99 Taking into account TfL and The Met Police's consultation responses it is considered that a planning condition for details of how the parking areas are laid out and how the Secured by Design measures are secured can ensure that the LCDS standards in qualitative terms are incorporated into the scheme to satisfy London Plan Policy T5.

Car club provision

- 10.100 London Plan T6.1 promotes sustainable transportation to reduce private car ownership. Specifically, Policy T6.1 in respect of car club spaces states outside the Central Activities Zone (CAZ), car club spaces can be considered as substitutes for private parking in new residential developments to accommodate infrequent trips. These spaces should be equipped with active electric vehicle charging facilities to support the use of low-emission vehicles. Local Plan Policy 24 supports proposals which include car club membership which is open to all and provide n site car club parking spaces.
- 10.101 The development proposals include the provision of a car club space on the site with access and egress onto Chippenham Road. It is not considered this would significantly harm the level of parking available for future occupiers. The provision for one car space can be secured under the Section 106 Agreement to satisfy Policy T6.1.

Construction, Delivery and Servicing

- 10.102 London Plan Policy T7 advocates that proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. A scheme should be designed and managed so that deliveries can be received outside of peak hours and in the evening or nighttime. Appropriate facilities are required to minimise additional trips arising from missed deliveries and thus facilitate efficient online retailing. Local Plan Policy 26 requires demonstration of adequate on-going maintenance and management arrangements with consideration given to how frequent deliveries will be accommodated. Furthermore, Policy T7 requires a Construction Logistics Plan and Delivery and Servicing Plan to support applications and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- 10.103 Mitigating measures for construction are included in the Construction Management Plan (CMP) to manage traffic and minimise disruption. The measures include construction vehicles using pre-approved routes to minimise disruption to local traffic and communities, scheduling deliveries during off-peak hours and implementing a system for managing delivery times, regular monitoring of construction activities which include reporting any issues allows for timely interventions to address problems and coordinating logistics with other construction sites in the area. The measures would aim to decrease the number of vehicles on the road during busy periods thus alleviating traffic congestion, minimise negative impacts on the surrounding area and reducing traffic to enhance overall efficiency in construction activities.
- 10.104 Delivery and servicing vehicles will access the site on-street via Chippenham Road and Kings Lynn Drive. A Delivery and Servicing Plan has been prepared which sets out that delivery procedures. It would require occupiers to inform their suppliers of any delivery restrictions and communicating the booking / management strategy to the Site Management Team where they would spread deliveries throughout the day using a web-based vehicle booking system to avoid peak activity. Few deliveries would be expected during the very early morning and later evening periods; however, if any should be required a noise abatement strategy will operate, whereby services vehicles would be instructed by the management office to turn off their engines once parked, for the duration of servicing activity.
- 10.105 Deliveries will take place on a minimum of 10m of full-height kerb with double yellow lines provided next to each building to facilitate loading and unloading. Additionally, waste collection will be managed with bin stores located near the access points for collection

vehicles (discussed in more detail under the Sustainable Waste Management section of this report).

- 10.106 In the absence of an objection from TfL, the CMP and DSP are considered acceptable and provides a framework to ensure construction activity, deliveries and servicing can operate without significant increase to noise and the flow of traffic using the road network. It is considered expedient to secure the measures under appropriate planning conditions to satisfy policies T7 and 26.

Active Travel

- 10.107 Active travel Assessments are intended to focus on the provision of new infrastructure and should not be used to remedy pre-existing deficiencies in infrastructure provision unless those deficiencies will be made more severe by new development. The mitigation, normally a contribution, can be used to increase the capacity of existing infrastructure or to repair failing existing infrastructure, if that is necessary to support development.
- 10.108 The Active Travel Zone (ATZ) measures include the provision of designated cycling routes, footway access for cyclists where space allows, and a 20mph speed limit in residential areas to enhance safety for walking and cycling. Additionally, the ATZ assessment identifies key destinations and routes, prioritising access to public transport, schools, and amenities. Future improvements and safety enhancements are also considered to support sustainable travel.
- 10.109 The Assessment is considering being considered by the Highway Authority and the conclusion will be reported as a late item to Members. Should there be required mitigation this will be included within the s.106 to ensure they are appropriately secured.

Conclusion

- 10.110 It is considered that the proposals would assimilate with the existing foot and road network and the quantum of development can be accommodated within the site having regard to the findings of the transport assessment.
- 10.111 The Local Highway Authority has raised no objections and as such, it is considered that the proposal would be acceptable in highway terms satisfying relevant national, London and Local Plan policies in respect of parking or highway safety issues.

Sustainability and Energy Efficiency

- 10.112 Paragraphs 163 - 166 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 for residential development achieves at least a 35 per cent reduction in regulated carbon dioxide emissions beyond Part L Building. Residential development should achieve 10 per cent through energy efficiency measures. Specifically, Policy SI2 sets out an energy hierarchy for assessing applications, as set out below:

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

- 10.113 The applicant has submitted an Energy Statement, which details the likely energy demands of the proposed development and proposed energy supply measures. A Sustainability Statement has also been submitted, which appraises policy and reviews project specific targets in relation to matters such as energy, water, resource conservation, waste management, biodiversity and pollution control.
- 10.114 The energy report sets out that a 77% reductions in regulated CO₂ emissions over Building Regulations Part L 2021 (Part L 2021), exceeding the GLA minimum target of 35% and the benchmark target of 50%.
- 10.115 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"> • Significantly improved fabric ‘U’ values • Minimised thermal bridging • Improved air tightness • Optimised g-value of the glazing – to provide a balance between minimising heat gain in summer (to reduce overheating), maximising useful heat gain in winter (to reduce heating energy) and maximising natural daylight (to reduce lighting energy) • Site-wide heating system • High efficiency ventilation systems • Minimised heat loss from hot water systems • Controls systems to monitor and operate the plant and equipment as efficiently as possible. • Low energy lighting and smart meters.
<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"> • There are no existing or proposed heat networks in the vicinity of the site, however the site is within a GLA designated Heat Network Priority Area so it is proposed to provide a communal heating system serving the whole site with the capability to connect to a future district heat network should one become available. • It is proposed to serve the site heat network from an on-site energy centre which uses heat pumps as the primary energy source. • The site heat network will be designed to minimise heat losses including measures such as minimising pipework lengths and installing high level of insulation (in excess of British Standards).
<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"> • Proposed to install a total of 153 No. photovoltaic panels (PV) on the roofs of the four residential blocks with a total peak output of 58 kW (based on 380W, 1.72m², 22% efficient panels) which will generate around 21,129 kWh of electricity per year (based on UK Government Standard Assessment Procedure (SAP) calculations). • The heat pumps and PV panels will provide an overall saving of 74,007 kg CO₂ per year in regulated carbon dioxide emissions.

- 10.116 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 77% (be lean – 14% and be green 63%). In terms of carbon offset, it is estimated that 816 tonnes of residential CO₂ would need to be offset. This is estimated at £77,565 and the mechanism to secure this would be through the Section 106 Agreement.

Fire Safety

- 10.117 London Plan Policy D12 advocates that all development proposals must achieve the highest standards of fire safety with high regard to appropriate measures in place for external spaces. Furthermore, it is required to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire, minimise the risk of fire spread, and provide suitable means of space. Major applications 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.
- 10.118 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.
- 10.119 The applicant has provided a statement containing a declaration of compliance that the fire safety of the proposed development and the fire safety information satisfy the requirements of Policies D12(A) and D5(B5). London Fire Bridge have reviewed the application and have raised no objection. Compliance with the fire statement submitted shall be secured through the imposition of a planning condition should the application be recommended for approval.

Ecology and Biodiversity

- 10.120 NPPF Paragraph 187 emphasises the need for minimising and providing net gains for biodiversity which includes incorporating features which support priority or threatened species. London Plan Policy G6 recommends that Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
- 10.121 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.

Effect of Demolition / construction

- 10.122 The ecological appraisal identifies that within the site modified grassland with introduced shrub, scattered trees and a hedgerow all provide habitat potential to support bats, nesting birds, invertebrates and hedgehogs.

- 10.123 In respect of bat within the site surveys were taken late in the season and between 25/08/24 and 28/09/24. This is justified by the warmth of the weather and the urban nature of the site. Although it does not cover the full survey period, thereby providing less certainty that no bats are roosting on site, levels of bat activity in the area are low and a further survey will be undertaken prior to felling.
- 10.124 The report includes several recommendations for mitigating impacts on wildlife, key recommendations comprise implementing lighting strategies to minimise disturbance to support foraging and roosting bats, timing of site works to avoid bird breeding seasons and protection of existing nesting sites, retaining the dead oak within the site to support invertebrates and removal of shrub in a staged manner to protect hedgehogs.
- 10.125 A planning condition is recommended to allow the applicant to explore different options for the retention and reuse of the dead oak within the site. Although this would have a positive reflection on the biodiversity uplift for the site it can also be explored in using the dead oak as a dual purpose e.g. active / passive play equipment to improve the carbon capture credentials which also can support invertebrates.
- 10.126 There would be a total loss of 24 trees within the site with six retained. The TPOs and non-protected trees proposed to be retained are afforded protection by planning condition for the root protection areas and crowns.
- 10.127 It is considered expedient to secure the mitigation measures identified in the Ecological Appraisal by condition and that they implemented in full. This is necessary to conserve and enhance protected and Priority species particularly bats and nesting birds.

Biodiversity Net Gain

- 10.128 The relevant primary legislation for the statutory framework for biodiversity net gain is principally set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990. This legislation was inserted into the 1990 Act by Schedule 14 of the Environment Act 2021, and was amended by the Levelling Up and Regeneration Act 2023. The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024 made consequential amendments to other parts of the 1990 Act.
- 10.129 The Legislation introduced a mandatory 10% Biodiversity Net Gain requirement for most new developments in England. Developers must demonstrate a measurable increase in biodiversity using the Defra Biodiversity Metric. BNG must be maintained for at least 30 years through on-site or off-site habitat creation or enhancement.
- 10.130 It is not proposed to meet mandatory BNG requirements on-site. Although achieving an increase in habitat units given the next loss in hedgerows the scheme would fail the trading rules. Therefore, additional off-site measures will also be required to address trading rules and address the loss of 0.80 units of urban trees (medium distinctiveness habitat).
- 10.131 A Biodiversity Net Gain Assessment has been submitted and identifies that 58 trees and 150 metres of native hedgerow will be required to be planted to provide the offsetting compensation in order to achieve the uplift in BNG.
- 10.132 The specific details of the planting have not been identified. However, given there would be a number of potential sites within the applicant's gift which would also have a wider public benefit, site selection and specific details can be secured by s.106 Agreement through a Biodiversity Gain Plan.

Proposed scheme

- 10.133 Notwithstanding the off-site mitigation it is proposed that a number of measures are implemented within the site. The report proposes several Biodiversity Net Gain (BNG) measures aimed at enhancing the ecological value of the site. These measures include inter alia prioritising the use of native species in all landscaping, installing features such as bird boxes, bat boxes, and insect hotels within the landscaped areas and designing landscaped areas to connect fragmented habitats, allowing wildlife movement and reducing isolation. These landscaping measures are intended to enhance the ecological value of the site and contribute to the overall BNG goal.
- 10.134 Taking a proportional approach, it is considered planning conditions can secure the implementation of the recommendations within the Ecological Appraisal and ensure that construction takes into account biodiversity with an enhancement strategy and a sensitively designed lighting scheme.
- 10.135 With the measures secured by planning condition and Legal Agreement or unilateral undertaking whichever is the appropriate legal mechanism will enable the LPA to demonstrate its compliance with its statutory duties, London Plan and Local Plan policies including its biodiversity duty under s40 NERC Act 2006 (as amended) and delivery of mandatory Biodiversity Net Gain.

Flood Risk, Drainage and Urban Green Factor

- 10.136 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.
- 10.137 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. Furthermore, the policy requires developments to reduce surface water runoff by providing sustainable drainage systems (SuDS) and apply London Plan drainage hierarchy achieving greenfield run-off rates.
- 10.138 The application site is in the most part located within Flood Zone 1 in an area benefitting from river flood defences and generally has a low and very low risk of surface water flooding on Dartfields (east) most likely rainfall filling localised depressions. The proposed surface water strategy for the site has been developed to utilise SuDS to attenuate surface water at source and reduce the risk of downstream flooding as far as possible. To mitigate the risk of flooding from surface water and anticipated effects of climate change, the Development will incorporate SuDS to manage storm water and reduce pre-development discharge rates.
- 10.139 Sustainable urban drainage systems have been incorporated into the proposal in the form of attenuation tanks, natural aquifer blocks, permeable paving. The use of soakaways, wetlands, ponds, and swales are not viable at this site due to soil conditions, available space, and levels constraints.
- 10.140 Overall, it is considered that the proposed SUDS measures are satisfactory and no objection has been raised by the LLFA. The measures can be secured via condition. 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 Local Plan Policy 32.

- 10.141 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 0.45 exceeding the residential target. This would be achieved through a range of urban greening measures, including semi-natural vegetation, intensive and extensive green roofs, flower-rich perennial planting, rain gardens, tree planting, green walls, groundcover planting and permeable paving.

Environmental Issues

Land Contamination

- 10.142 The Council's Environmental Health Officer has raised no objections in relation to any historical contaminated land issues, air pollution or noise. It is noted that the site is previously developed land which is occupied by a public house and includes asphalt hard standing which may give rise to contamination. As such it is recommended that a Phase I and Phase II investigation be undertaken to ensure the suitability for the site for residential use. Should there be the presence of pollutants within the site a remediation strategy (Phase II) and verification report will be required. This can be secured by planning conditions. A further condition is recommended to capture any unforeseen contamination and remediation required during the development to maintain public safety.
- 10.143 As such it is considered the scheme with the imposition of appropriate planning conditions would satisfy Local Plan Policy 34.

Air Quality

- 10.144 The Council is committed under Local Plan Policy 33 to improve air quality in Havering by ensuring developments are at least air quality neutral, optimise green infrastructure, support active travel, meet carbon dioxide reduction targets and minimise construction emissions. An Air Quality Action Plan has been adopted by the Council to encourage sustainable travel and renewable energy use. In line with London Plan policy, development will be expected to be air quality neutral. The minimum benchmarks in the GLA's Sustainable Design & Construction SPG will need to be complied with. Where there is a risk of any negative air quality impacts associated with development proposals, to ensure that air quality has been adequately considered and any negative impacts are minimised.
- 10.145 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). The application has been supported with an Air Quality Assessment which considers the effect of construction and on occupation.
- 10.146 The report references local air quality monitoring data, which shows that measured annual mean NO₂ concentrations at monitoring sites closest to the proposed development have been below the annual objective since 2017. This suggests that existing air quality conditions are acceptable for current residents.

Construction

- 10.147 The report assesses the potential air quality impacts from emissions generated by construction traffic. It indicates that the overall air quality effect of the proposed development will be 'not significant', meaning that construction traffic will not introduce new receptors into

areas of unacceptable air quality, nor will it significantly impact local air quality. The construction works are expected to generate traffic flows that are below industry screening thresholds, which further supports the conclusion that the impacts on local air quality will be minimal. Given that the construction traffic is not expected to have a significant impact on local air quality, the report concludes that it is not necessary to propose further mitigation measures for the operational impacts related to construction traffic.

- 10.148 The impacts from on-site exhaust emissions from on-site plant (non-road mobile machinery or NRMM) and site traffic are unlikely to make a significant impact on local air quality. This conclusion is based on the relatively small scale of the proposed development, which limits the number of NRMM operating at any one time. It is expected that all NRMM will comply with applicable emissions standards as outlined in the GLA's Control of Dust and Emissions During Construction and Demolition SPG. The report highlights that there will be no idling of vehicles when not in use, and machinery will be positioned away from sensitive receptors. These operational practices are intended to further reduce the risk of significant effects on existing receptors due to on-site machinery emissions. The report indicates that consideration should be given to the number of plant/vehicles and their operating hours and locations to assess whether a significant effect is likely to occur.
- 10.149 Construction activities, including demolition, earthworks, and construction processes, can generate dust that may affect air quality in the surrounding area. The construction dust risk assessment approach involves screening the need for a detailed assessment based on the proximity of receptors to the construction site. The assessment considers the potential for dust impacts within specified distances (e.g., 250 meters from the site boundary). To minimise dust emissions, the report recommends implementing a package of mitigation measures. These measures are designed to ensure that any residual effects from construction dust will be 'not significant'. The guidance from the IAQM and GLA outlines best practices for controlling dust during construction. For medium-risk sites, the GLA's guidance suggests that automatic monitoring of particulate matter (such as PM10) may be required. This monitoring helps to ensure compliance with air quality standards and to assess the effectiveness of mitigation measures. The report concludes that, while construction dust and particulate matter emissions pose potential risks to air quality, with appropriate mitigation measures in place, the residual effects of construction dust and particulate matter emissions are expected to be 'not significant'. This means that the construction activities will not introduce new exposure to areas of poor air quality or significantly worsen existing conditions.

Occupation

- 10.150 The proposed development is expected to generate a net increase of 73 Annual Average Daily Trips (AADT) at the site, which is below the screening threshold of 100 light-duty vehicles (LDVs) recommended for use within an Air Quality Management Area (AQMA). This indicates that the operational traffic generated by the development will not significantly impact local air quality.
- 10.151 The London Atmospheric Emissions Inventory (LAEI) maps indicate that concentrations of NO₂, PM₁₀, and PM_{2.5} at the proposed development site are expected to be below air quality objectives by 2025. This further supports the conclusion that future residents will experience acceptable air quality conditions. Therefore, no additional mitigation measures are deemed necessary for the operational phase impacts.

Air Quality Neutral Compliance

- 10.152 London Plan Policy S11 echoed by Local Plan Policy 33 focuses on improving air quality across London. It emphasises the need for developments to be air quality neutral, encourages the use of green infrastructure to mitigate pollution, and mandates that all planning decisions consider air quality impacts.
- 10.153 The report states that the building and transport-related emissions associated with the proposed development are below the relevant benchmarks, indicating compliance with the requirement that all new developments in London should be at least air quality neutral.
- 10.154 In summary, the operational phase impacts on existing receptors are assessed to be minimal, with no significant adverse effects on local air quality anticipated. The existing air quality conditions are acceptable, and the proposed development is expected to comply with air quality objectives.
- 10.155 To safeguard against additional unnecessary impacts to air quality, conditions are recommended to mitigate future impacts during the construction and operational phases of the development, including details to protect the internal air quality of the buildings as well as a requirement for ultra-low carbon dioxide boilers.

Noise

- 10.156 London Plan Policy D14 focuses on managing and mitigating noise to protect and improve health and quality of life in urban development. It requires developers to design developments to prevent substantial negative noise effects on health and well-being, use effective design strategies to reduce noise impacts without overly relying on sound insulation, use innovative design principles when separation from noise sources is not possible and encourage practices and technologies to limit noise at its source. The policy aligns with the Mayor's London Environment Strategy, promoting sustainable development and high-quality urban living.
- 10.157 The Environmental Health Noise officer has raised no objection to the application on noise grounds. Given the location of the site there is unlikely to be significant noise generated by the proposed development upon that may represent greater harm to neighbouring residents. Although there would be an element of noise generated by demolition of the buildings on site and construction for the proposed development planning conditions controlling NRMM and an appropriate construction management plan governing future machinery use and site activity can make the proposal acceptable on noise grounds. These conditions would be imposed should planning permission be granted.

Archaeology

- 10.158 NPPF Section 16 and the London Plan Policy HC1 recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. NPPF paragraphs 203 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities. Paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public. Local Plan Policy 28 will support proposals which would not affect the significance of a heritage asset with archaeological interest, including the contribution made to significance by its setting.

- 10.159 It has been advised by Greater London Archaeology Advisory Service (GLAAS) that the development could cause harm to archaeological remains and a 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. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.
- 10.160 It is therefore considered the imposition of planning conditions should the application be approved would satisfy the requirements of the NPPF, London Plan and Local Plan in respect of heritage assets of archaeological interest.

Sustainable Waste Management

- 10.161 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.
- 10.162 The Sustainable Design Statement states that site waste will be managed through a Construction Management Plan which will emphasise the need to minimise waste leaving site to the targeted maximum of 5% to landfill and the reuse of materials on the site in line with the waste hierarchy. It is reported that 0% of biodegradable and/or recyclable material will be sent to landfill.
- 10.163 It is considered the approach is acceptable and the imposition of a condition to secure a Construction Management Plan would satisfy London Plan Policy SI7.
- 10.164 Local Plan Policy 35 emphasises the importance of waste management in residential, commercial, and mixed-use developments. It mandates that developments must provide adequate internal and external storage for waste separation, recycling, and composting, along with on-site waste management to minimize waste transfer. Additionally, all major developments are required to submit a Waste Management Plan detailing expected waste types, volumes, and storage design to ensure effective waste management practices.
- 10.165 The application submission is accompanied by a waste management strategy for the proposed development.
- 10.166 The waste management strategy for future occupants, includes several key elements aimed at promoting effective waste segregation and management. Each residential property will be provided with a segregated waste bin within a kitchen unit. This setup allows residents to easily separate their refuse and recycling at the source. Communal waste stores will be established for each block, equipped with appropriate bins for refuse, recycling, and food waste. For example, Block A2 has specific bin requirements that include 1,100 Litre Eurobins for refuse and recycling, and 240 Litre wheeled bins for food waste.
- 10.167 On designated collection days, the waste collection contractor will collect the bins directly from the communal waste stores which are adjacent to the communal entrance points to each block. The process includes the refuse collection vehicle (RCV) parking at designated points on Chippenham Road and King's Lynn Drive close to the waste storage areas for efficient access with the contractor emptying and return the bins to the waste store after collection.

- 10.168 An on-site FM team will manage and monitor the communal waste stores. Their responsibilities include day-to-day management and cleaning of the bins and surrounding areas, monitoring the use of the waste storage area and addressing contamination issues with providing residents with guidance and educational materials to encourage proper waste segregation. The FM team will work with a resident community board to establish initiatives such as a 'freecycle' program, where residents can swap items for reuse. They will also coordinate with local authorities to ensure that usable bulky items are passed to third sector organizations for reuse.
- 10.169 The design and management of the waste facilities will comply with relevant standards, such as British Standard BS5906:2005, to ensure that the waste management practices are effective and sustainable.
- 10.170 An Underground Refuse Storage System has been explored by the applicant prior to the submission of the planning application. Given the significant and complex earthworks to implement such a system it is reported this would result in additional cost and comprise the delivery of the affordable home led scheme. Taking into account the level differences across the site Officers agree in this instance with the applicant's reasons of not incorporating an URS into the scheme.
- 10.171 Overall, the strategy emphasises the importance of resident participation in waste management, the provision of adequate facilities, and ongoing support from the FM team to foster a culture of sustainability among future occupants.
- 10.172 The Council's Waste Management Section have reviewed the proposed waste strategy for the residential 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. It is considered the strategy is satisfactory subject to imposition of relevant conditions to secure the management of waste in the case of an approval.
- 10.173 Overall, it is considered that the proposed development will provides a suitable waste strategy that meets the requirements of the London Plan Policy SI7 and Local Plan Policy 35.

Accessibility and Inclusivity

- 10.174 Policy D5 of the London Plan requires that all new development achieves the highest standards of accessibility and inclusive design. 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'. This is further echoed by LBH Policy DC7 which also seeks 10% of all new homes to be wheelchair accessible.
- 10.175 The proposed development includes a total of 14 accessible homes that meet Building Regulations Part M4(3), which equates to 10% of the overall homes in the development. These accessible homes are all 2-bedroom units, specifically designed for wheelchair users. The remaining 90% of homes will be Part M4(2) 'Accessible and adaptable dwellings'.
- 10.176 It is recommended that a condition is imposed to ensure that all dwellings comply with Policy D7 of The London Plan on Part M4(2) Accessible and adaptable dwellings with 10% of dwellings meeting Part M4(3) 'wheelchair users dwellings' compliance. Applicable conditions would be imposed in the case of an approval.

Financial and Other Mitigation

- 10.177 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.
- 10.178 In respect of education provision, the applicant has challenged the request for a s.106 contribution and drew attention to CiL in being the source of funding for education which includes the provision, improvement, replacement, operation or maintenance of education facilities. Furthermore, infrastructure secured using developer contributions secured through Section 106 planning obligations and outside of the Community Infrastructure Levy funding 'stream' will include only primary schools at Bridge Close and within the Rainham and Beam Park Housing Zone.
- 10.179 While both CIL and s106 can fund educational infrastructure, Officers seek to ensure that there is no overlap or "double-counting." Specifically CiL can generally be used for broader, strategic educational projects that benefit the wider community while contributions through s106 Agreements are applied to site-specific requirements directly resulting from a particular development's impact, where a particular need is identified. The two schools referenced to in the CIL Regulation 123 List (no longer a statutory requirement) are the two new primary schools required as part of the Bridge Close and Beam Park housing Zones. The DfE non-statutory guidance "Securing developer contributions for education", August 2023, promotes the use of S106 contributions where shortfalls in provision may result as a result of new development.
- 10.180 The DfE Pupil Yield Dashboard has been used to identify that presently there are no surplus secondary school places in both the Central and North planning areas which confirms that there will be a need to expand a secondary school to meet the growing demand arising from this housing development. The proposed housing will generate an additional 22 secondary aged children and 1 SEND place child in an area where it is projected that there is a deficiency of places. The suggested financial contribution would seek to address the shortfall generated by the proposed development. It is also noteworthy that the development, as affordable housing, would likely be exempt from CIL (see section below).
- 10.181 The applicant continues to consider that the education contribution is not necessary. On that basis, this matter has not been satisfactorily concluded at the time of completion of this report as there is no agreement to pay the sums considered necessary. It is therefore considered that the recommendation is for a contribution of "up to" £730,617 to allow for further consideration of the needs arising from the development (actual child yield) and whether any shortfall in places would require actual capital works to secondary/SEND schools in the Borough to increase capacity so that an agreement on any contribution can be reached.
- 10.182 To be air quality neutral an assessment needs to include calculations of the predicted building and transport emissions against the building and transport emission benchmarks to reach a conclusion. The AQN assessment submitted has not undertaken the calculations to determine if the scheme would be air quality neutral or if mitigation or a contribution to off-set the development's emissions is required. Given the possibility of a contribution it is not considered that the mitigation can be secured by planning condition. To secure such a payment if required it would be appropriately secured by Planning Obligation for the development to remain acceptable in planning terms.

CiL and MCiL

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

10.184 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.

10.185 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.

10.186 The applicant has provided a breakdown of the proposed buildings, which could result in the following CIL payments:

Planning obligation	Monetary contribution
Mayoral CIL	£252,350
Borough CIL	£1,261,750

10.187 However, in line with the CIL Regulations, Members attention is drawn to developments will not normally be liable for CIL if it is for social housing and a claim for social housing relief is made and accepted before development commences.

Equalities and Diversity

10.188 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.

10.189 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.

10.190 Policy CG1 of the London Plan also seeks to support and promote the creation of an inclusive city to address inequality.

10.191 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.

10.192 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. In addition, that the proposal will provide much need affordable housing and specialist housing for young people leaving the local authority care system.

Planning Balance

- 10.193 Section 38(6) of the Planning and Compulsory Purchase Act, 2004 requires the determination of this application to be made in accordance with the development plan, unless material considerations indicate otherwise. In coming to a balanced view, careful consideration must be given to the weight to be afforded to any conflict with the Local Plan, taking into account all material considerations in the overall planning balance, with particular reference and weight afforded to the council's housing land supply position and the weight to be afforded to development plan and its relevant policies.
- 10.194 Although the National Planning Policy Framework (NPPF) does not change the statutory status of the development plan it constitutes an important material consideration in the determination of planning applications.
- 10.195 When applying the relevant Local Plan policies in the overall planning balance the weight to be afforded to the relevant policies, and any conflict with these needs to be clearly understood. NPPF Paragraph 61 sets out that to support the government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The Council's most recent Housing Land Supply Statement (October 2023) identifies a housing land supply of 2.4 years, which is a significant shortfall against the required 5-year supply set out in paragraph 74 of the NPPF. This means applying a tilted balance towards the delivery of residential development.
- 10.196 The presumption in favour of sustainable development identified by NPPF means that it is necessary to consider whether the proposed development represents 'sustainable development'. NPPF paragraph 7 sets out the three dimensions to sustainable development as being:
- Economic
 - Social
 - Environmental
- 10.197 The presumption in favour of sustainable development means that it is necessary to consider whether the proposed development represents 'sustainable development'. NPPF paragraph 8 identifies that there are three dimensions to sustainable development; namely economic, social and environmental. The NPPF advises that these roles should not be undertaken in isolation, because they are mutually dependent. Furthermore, to achieve sustainable development, economic, social; and environmental gains should be sought jointly and simultaneously.

An economic role

- 10.198 The economic role is defined as "contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation: and by identifying and coordinating development requirements, including the provision of infrastructure.
- 10.199 The government has identified the delivery of housing as a key driver of future economic growth and stimulation of the economy. It is recognised that there are economic benefits associated with the development through both direct and indirect employment opportunities.

Although the applicant has not sought to quantify the economic benefits of the scheme, it is accepted that there will be some economic benefits associated with the construction period and following completion of the works through spending in the local and wider area.

- 10.200 In light of the Governments push for economic growth it is considered that moderate weight in favour of the application can be afforded to these benefits. It is considered that the proposal is one for development of the right type, in the right place and infrastructure is sufficient, subject to the inclusion of conditions and legal agreements or unilateral undertaking whichever is the appropriate legal mechanism, to support the development.

A social role

- 10.201 The scheme will deliver a fully affordable housing scheme which will make a positive significant contribution towards meeting the housing needs of the borough. It is considered that the delivery of affordable housing at a higher level than normally received should be afforded significant weight in favour of the application.
- 10.202 The scheme will also deliver a good proportion of family housing and smaller units that would alleviate pressure on providing temporary accommodation as well as provide accommodation for care leavers. This is afforded significant weight in favour of the application.
- 10.203 It is considered that this scheme would deliver a mix of dwelling types including on site open space, which will contribute towards the creation of sustainable communities. The social benefits of the development are therefore considered to be significant and are afforded significant weight in the overall planning balance.

An environmental role

- 10.204 There are no specific policies within the NPPF which indicate that development should be restricted on the site. The site is not designated for its nature conservation value and it is considered that any ecological impacts associated with the development can be successfully mitigated through the imposition of conditions. The scheme will retain key trees on site and when combined with measures to secure biodiversity net gain the loss of the existing tree and vegetation will be sufficiently mitigated with an overall gain achieved.
- 10.205 In terms of the built environment, it is considered that the proposals achieves a design which serve to enhance the character of the buildings and the surrounding area. As such the scheme is considered acceptable in respect of design and would attract moderate weight in the overall planning balance.
- 10.206 However, it has been identified that there would be noticeable reductions in the internal light for the habitable rooms and a loss of outlook for existing properties that face the application site as set out earlier in this report.

Planning Balance

- 10.207 The role of the Local Planning Authority is to objectively determine a planning application in accordance with the Development Plan unless material consideration suggest otherwise and with what is before them.
- 10.208 It is recognised that the site is constrained and it has been designed to provide a level of affordable housing and supported living that would represent a significant benefit to the

Borough. It has been demonstrated that the mix of housing proposed would address a specific housing need while balancing the constraints of the site.

- 10.209 Whilst the report does clearly set out that the scheme will result in an adverse impact on the outlook and light to the properties 126 – 132 (even) Dartfields, which would result in a detriment to the amenity of these occupiers, contrary to Local Plan Policy 7. The proposal would also result in the loss of a public house with social value, contrary to London Plan Policy HC7, although the interim/permanent replacement secured through S106 partly addresses this conflict. Officers have weighed this adverse impact in the planning balance and have concluded that overall the significant benefits of the scheme in the form of it being 100% affordable housing meeting a much recognised need within the borough as well as importantly providing much needed specialist housing for young people leaving the care system it is considered that on balance this is sufficient to overcome the officers concern over the impact on the amenity of these residents and loss of the public house.

11.0 CONCLUSION

- 11.1 This comprehensive proposal has been developed through pre-application and public engagement exercises.
- 11.2 This principle of the loss of the existing housing and The Alderman public house on the site is considered acceptable. The principle of new affordable housing is considered acceptable and would uplift the number of affordable homes within the site.
- 11.3 The applicant has demonstrated that the proposed mix of housing would meet an identified need while accounting for the challenging constraints with bring such a site forward and the necessity for the scheme to be delivered with a substantial proportion of GLA funding.
- 11.4 The proposal would see an improvement to the natural environment through on and offsite biodiversity mitigation measures.
- 11.5 The proposed development will be quite visible from long-range views, standing out as a significant feature in the landscape. However, its contextual design and the integration of landscaping elements will help to ensure that it complements the existing urban environment rather than detracting from it. Given the design and layout of the 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 as such on balance the quality of the residential units is considered to be acceptable.
- 11.6 By meeting the identified housing need of the Borough sufficient weight has been applied in the planning balance to outweigh the significant harm to the amenity of the existing properties that face the site in terms of light and outlook.
- 11.7 The application material, including the traffic assessment 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.
- 11.8 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, the London and Local Plan, the proposals are nevertheless considered to represent a viable, and on

balance acceptable form of development. Subject to the proposed planning conditions and the prior completion of a suitable legal mechanism such as a S106 agreement, the application is recommended accordingly for approval.