



**Havering**  
LONDON BOROUGH

## **Strategic Planning Committee**

**8 May 2025**

<b>Application Reference:</b>	P1463.24
<b>Location: Ward</b>	Dorrington Gardens Car Park, Hornchurch
<b>Description:</b>	Demolition and removal of all structures and hardstanding and construction of 34 residential dwellings, creation of a new access, with car parking, landscaping and related infrastructure, including a new substation (Amended description).
<b>Case Officer:</b>	Malachy McGovern
<b>Reason for Report to Committee:</b>	The applicant for the development is the Council's development arm, Mercury Land Holdings

### **1 BACKGROUND**

- 1.1 The application site comprises the Dorrington Gardens public car park, a Council-owned asset located on the south-western edge of Hornchurch town centre. The site currently accommodates 188 marked car parking spaces, including provision for disabled users, and is formed of predominantly hardstanding with minimal landscape features. In accordance with the Council's Capital Strategy and medium-term asset disposal programme, the Dorrington Gardens car park was identified as surplus to operational requirements. Following statutory consultation in early 2023, including amendments to the Traffic Management Orders and consideration of alternative parking capacity in the local area, the Council's Cabinet resolved to authorise disposal of the site to optimise its contribution towards housing delivery and the wider economic, social and environmental wellbeing of the borough.
- 1.2 The applicant, Mercury Land Holdings Ltd—a wholly owned Council company—has submitted a full planning application seeking consent for the demolition and clearance of the existing car park and the redevelopment of the site to provide 34 residential dwellings, together with a new vehicular access, associated car parking, landscaping and ancillary infrastructure including a substation. The proposals follow detailed pre-application discussions with

Council officers and design review by the Havering Quality Review Panel on Tuesday 12<sup>th</sup> December 2023, with a number of revisions incorporated in response to design, landscape and amenity considerations. The site is not subject to specific restrictive policy designations on the Local Plan Policies Map but lies within the Hornchurch District Centre and is considered a highly accessible location (PTAL 4), appropriate for residential intensification consistent with adopted local and regional planning policy objectives.

## **2 SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- 2.1 The proposed development would make a valuable contribution to meeting the Borough's housing need by delivering 34 high-quality dwellings, including a mix of family-sized houses and smaller units, on previously developed land within a sustainable urban location. The loss of the existing car park is justified by both strategic asset management priorities and evidence confirming surplus capacity in alternative off-street and on-street provision. The scheme has been subject to detailed pre-application engagement and Quality Review Panel assessment, resulting in a design-led approach that is responsive to local character, delivers a well-integrated streetscape, and secures an appropriate balance between density, amenity and landscape provision. The proposals are considered to have an acceptable impact on the amenity of neighbouring occupiers, provide adequate parking and sustainable transport measures, and comply with relevant local and regional planning policy objectives.

## **3 RECOMMENDATION**

- 3.1 That the Committee resolve to GRANT planning permission subject to:
- The prior completion of a legal agreement pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended), Section 16 of the Greater London Council (General Powers) Act 1974 and all other enabling powers to secure the following planning obligations:
    - A Carbon offset payment
    - Restrict Future Resident's Access to Parking Permits
    - An Affordable Housing payment of £77,129 and a late stage affordable housing review mechanism.
    - The developer to pay the Council's legal costs associated with the preparation and negotiation; of the planning obligation irrespective of whether or not it is completed the Council's administrative costs associated with monitoring compliance with the obligation terms and all contributions to be indexed using BCIS Tender Price Index from the date of completion of the section 106 obligation to the date of actual payment.
- 3.2 That the Assistant Director Planning is delegated authority to negotiate the legal agreement indicated above.

- 3.3 That the Assistant Director Planning is delegated authority to issue the planning permission subject to the prior completion of the Section 106 obligation and the following planning conditions:

The following conditions;

1. Time for commencement
2. Scheme to be carried out in accordance to plans
3. No additional windows on the flank elevations
4. Removal of Permitted development for houses– (outbuildings, extension, roof enlargement).
5. Materials
6. Landscaping
7. Existing Trees protected during construction
8. Boundary treatment (walls and fences) surrounding the site.
9. Refuse and recycling
10. Cycle storage
11. Hours of construction 8.00am and 6.00pm Monday to Friday, and between 8.00am and 1.00pm on Saturdays and not at all on Sundays and Bank Holidays/Public Holidays.
12. Air quality neutral
13. Dust management plan
14. Contaminated land
15. Construction management plan
16. Sustainable drainage, including Surface water management plan
17. Electric Charging
18. Secure by design
19. Boilers
20. Water efficiency
21. All measures to be in accordance with submitted ecological appraisal
22. Habitat Management and Monitoring Plan (HMMP)
23. Reptile Mitigation Strategy
24. Biodiversity Enhancement Strategy
25. External lighting including Wildlife Sensitive Lighting Design
26. Biodiversity Net Gain
27. Maximising the use of PV panels
28. Noise – from plant and machinery.
29. Non Road Mobile Machinery (NRMM)
30. Land contamination;
31. Archaeology
32. Parking management plan.
33. M4(2) and M4(3) Housing

#### **Informatives**

CIL, Highways works, reason for granting permission, new house numbering

## **4. Site and Surroundings**

- 4.1 The application site comprises a 0.6-hectare area of land currently in use as a surface-level public car park, situated to the south-west of Hornchurch District Centre. The site is located on the southern side of Dorrington Gardens and is accessed directly from this local road. The car park is surfaced entirely in

tarmac and accommodates 188 marked parking bays, including 5 designated disabled spaces. A modest central landscape strip and a limited number of trees are situated within and around the periphery of the site. Site levels fall gently from the northern boundary towards the centre before rising again toward the southern edge. The site is largely flat and free from built structures.

- 4.2 The site lies within a transitional urban context. To the immediate north and north-east are residential and mixed-use developments associated with the Hornchurch town centre fringe, including a three/four-storey apartment block. The eastern boundary adjoins the rear of commercial and residential properties fronting Station Lane, while to the south and west the surrounding area comprises a suburban residential neighbourhood of predominantly two-storey semi-detached and detached dwellings. The site benefits from strong public transport connectivity, with Hornchurch Underground Station approximately 850m to the south, Emerson Park Overground Station 1km to the north, and multiple bus routes accessible within 170m. The site is located within PTAL Zone 4, reflecting good accessibility by sustainable modes of transport. There are no statutory or locally listed buildings on the site, nor is it located within a conservation area or subject to any specific landscape or ecological designations.
- 4.3 The site is not located within a conservation area, nor does it contain or adjoin any statutorily or locally listed buildings. As such, there are no designated or non-designated heritage assets either on or immediately adjacent to the site that would be affected by the proposed development. The site lies within Flood Zone 1, as defined by the Environment Agency, and is therefore considered to be at low risk of flooding from rivers or sea.

### **Proposed development**

- 5.1 Full planning permission is sought for the demolition and removal of all existing hardstanding and ancillary structures associated with the existing car park, and the redevelopment of the site to provide 34 residential dwellings. The proposal comprises a mix of 10 one-bedroom apartments, 12 two-bedroom apartments, and 12 three-bedroom semi-detached houses. The development also includes the formation of a new vehicular access from Dorrington Gardens, associated car parking, hard and soft landscaping, and the installation of ancillary infrastructure, including a new electricity substation.
- 5.2 The development adopts a mixed typology, with two pairs of semi-detached houses (HT2) on either side of the main site access road fronting Dorrington Gardens, two apartment blocks (Blocks A and B) fronting the internal road of the site, and a row of 8 semi-detached houses (HT1) to the south of the site fronting the internal road to the site. The scheme has been subject to a detailed design evolution, incorporating feedback from pre-application consultation, the Havering Quality Review Panel, and the Council's urban design and highways officers. The development is predominantly two to three storeys in height and has been designed to respond to local character, manage level changes across the site, and provide appropriate separation distances to neighbouring residential boundaries.

- 5.3 A total of 24 car parking spaces are proposed, comprising a mix of on-plot and on-street provision, equating to a parking ratio of approximately 0.7 spaces per dwelling. Cycle parking is provided in accordance with London Plan standards, with long-stay secure cycle storage for all dwellings and additional visitor spaces within the public realm. Refuse and recycling storage is provided to the rear of each house and within secure bin stores for the apartment blocks, with collection arrangements designed in accordance with the Council's Waste Planning Guidance. The scheme includes soft landscaping throughout, including tree planting, private amenity spaces for all dwellings, and a communal green area with opportunities for informal play.

## **6. Planning History**

- 6.1 A review of the Council's online planning records indicates that there is no substantive planning history associated with the application site. The site has historically operated as a public 'Pay and Display' car park under the ownership of the London Borough of Havering, with no records of previous planning applications for redevelopment or significant alterations.
- 6.2 The site was formally identified for potential disposal as part of the Council's medium-term asset management strategy. Cabinet authority to progress with the disposal of the car park was granted following statutory consultation undertaken in March 2023 regarding the proposed removal of the site from the Council's Off-Street Parking Order and associated Traffic Management Orders. This included consideration of car park utilisation data and the availability of alternative parking provision in the local area. The decision to dispose of the site was reaffirmed by Cabinet in August 2023, with the site deemed surplus to operational requirements and suitable for redevelopment to support the Council's strategic housing and regeneration objectives.

## **LOCAL REPRESENTATIONS**

- 7.1 138 letters of notifications were sent to the adjoining occupiers. 42 objections have been received and 1 letter of support. The objections can be summarised as follows:

Issue 1: Loss of light and overlooking to existing dwellings; concerns about gas flue and electricity meter; loss of rear access; impact on privacy and noise levels.

Officer Response: The proposed development has been subject to detailed design evolution, including assessment of separation distances and boundary relationships. No habitable room windows are directly aligned toward sensitive boundaries, and any overshadowing is within BRE guidelines. Utility connections and access arrangements will be protected during construction and further clarified by condition.

Issue 2: Reduction of public car parking impacting local businesses; historic land use concerns (e.g. former allotments).

Officer Response: Parking surveys demonstrate significant underutilisation of the existing car park. Sufficient alternative parking is available nearby. There

are no planning constraints preventing redevelopment. The principle of optimising brownfield land for housing aligns with local and London Plan policy.

Issue 3: Local infrastructure (GPs, schools, transport) is overstretched; concerns about council finances and cost of additional service demands.

Officer Response: The scale of development is modest (34 units) and CIL/s106 contributions will support infrastructure improvements. No statutory consultees have raised objections on infrastructure grounds. Local Plan housing targets require use of suitable sites such as this.

Issue 4: Loss of privacy and outlook, especially from new dwellings at the rear; concern about height and building line inconsistencies.

Officer Response: The scheme has been revised in response to QRP and design officer feedback. First-floor lines and building depths reflect local context. Overlooking distances meet policy requirements and no significant harm to neighbouring amenity has been identified.

Issue 5: Potential amenity impact from new tree planting; request for Right of Light assessment.

Officer Response: Landscaping proposals aim to enhance green infrastructure and biodiversity. Final species selection can be controlled by condition. Right to light is a private legal matter, though daylight/sunlight levels have been assessed and are policy compliant.

Issue 6: Increased congestion and unsafe parking in surrounding streets; parking overspill and pressure on cul-de-sacs such as Bruce Avenue.

Officer Response: The site has good public transport access (PTAL 4) and proposed parking levels are compliant with the London Plan. The scheme includes cycle parking and encourages modal shift. Traffic impacts have been reviewed and deemed acceptable.

Issue 7: Loss of wildlife habitat and views of trees; concerns over tree removal.

Officer Response: A full Arboricultural Impact Assessment and Biodiversity Net Gain report have been submitted. The scheme retains existing trees where possible and proposes significant new planting, achieving measurable ecological enhancements.

Issue 8: Impact on Hornchurch town centre vitality due to loss of customer parking; cumulative impact of other car park closures.

Officer Response: Town centre viability is supported by increased local population from new homes. Surveys show surplus parking capacity in the area. The Council's Active Travel Strategy also supports reduced car reliance for short journeys.

Issue 9: Development out of character with low-rise surroundings; visual impact of flats.

Officer Response: The proposal is predominantly 2–3 storeys in height, consistent with local character. Design has been assessed by the Havering QRP and deemed contextually appropriate. Materials and form are sympathetic to surrounding built form.

Issue 10: Construction phase disruption (noise, traffic, access).

Officer Response: A Construction Management Plan will be secured by condition to mitigate impacts. Construction hours and site operations will be controlled to minimise disturbance to neighbouring residents.

### **Internal and External Consultation:**

#### **7.2 Internal Consultees**

LBH Environmental Health (Noise & contamination) - No objections subject to conditions

LBH Environmental Health (Air quality) - No objections subject to conditions

LBH Highways - No objections subject to conditions

LBH Waste & Recycling - No objections subject to conditions

Place Services (Ecology) - No objections subject to conditions

LBH Naming & Numbering – No objection

LBH Local Lead Flood Officer – no objection

#### **7.3 External Consultees**

Anglican Water Authority – No objection

Thames Water – No objection

Essex & Suffolk Water – No objection

London Fire – No objection

Historic England (GLAAS) – No objection

Environment Agency – No objection

Metropolitan Police – No objection subject to condition

Schools Organisation – No objection and request for contribution

### **8 MATERIAL PLANNING CONSIDERATIONS**

8.1 The main issues for consideration for this application are:

- The principle of development
- Housing Mix - size
- Scale, height, bulk and design
- Quality of the proposed accommodation
- Impact on Neighbouring Amenity
- Transport and Highways
- Environment Issues
- Sustainability
- Flooding and Drainage
- Ecology
- Energy Efficiency
- Community Infrastructure Levy / s106
- Equalities

### **Principle of development**

- 8.2 The application site comprises previously developed land within the urban area, currently used as a surface-level public car park. The site is not subject to any statutory or non-statutory designations which would constrain redevelopment, and it is not located within the Green Belt or a conservation area. The site benefits from good accessibility to local services and public transport (PTAL 4) and is within close proximity to Hornchurch District Centre. As such, it represents a suitable and sustainable location for residential intensification in line with the policy objectives of the Development Plan.
- 8.3 The National Planning Policy Framework (NPPF, 2024) sets out a clear presumption in favour of sustainable development and places increased emphasis on unlocking the potential of under-utilised urban land for housing delivery. It promotes the reuse of previously developed land within settlements, particularly in locations well served by public transport, services and infrastructure. The NPPF supports housing-led redevelopment of brownfield sites such as car parks where proposals optimise site capacity and contribute meaningfully to local housing supply.
- 8.4 The London Plan (2021) similarly encourages boroughs to proactively support residential development on surplus public land and low-density commercial sites. Policy GG4 promotes delivering the homes Londoners need, while Policy H1 seeks to optimise housing delivery on all suitable brownfield sites, including car parks (Policy H1(2)(b)). Policy SD7 supports the intensification of town centre locations and acknowledges the redevelopment of surface car parks as a strategic source of housing land supply.
- 8.5 At the local level, the Havering Local Plan (2021) identifies a minimum housing delivery target of 12,850 homes over the plan period (Policy 3). The site is located within the boundary of Hornchurch District Centre, where Policy 13 and Policy 3 support the delivery of residential uses to help meet identified housing needs. The Local Plan also reflects the strategic priority of utilising under-used land, consistent with Policy 36, which promotes sustainable development and low-carbon living. While the loss of the existing car park is noted, Policy 24



states that development proposals resulting in the loss of public parking must demonstrate there is no need for these spaces.

- 8.6 In this regard, robust car parking utilisation surveys have been submitted with the application, demonstrating that the existing facility is significantly under-used and that sufficient alternative parking provision is available in the local area. These findings were previously reviewed and accepted by the Council as part of the statutory consultation and Cabinet decision-making process authorising the site's disposal. Moreover, the Council's Active Travel Strategy supports a long-term reduction in private vehicle dependency through investment in walking and cycling infrastructure.
- 8.7 It is therefore considered that the principle of residential redevelopment is acceptable, and fully supported by national, regional and local planning policy. The proposal would contribute to the Borough's housing supply, make more effective use of previously developed land, and deliver high-quality homes in a highly sustainable location. The loss of the existing car park has been justified, and no conflict is identified with the relevant provisions of the NPPF, London Plan or Havering Local Plan.

#### **Housing supply;**

- 8.8 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.
- 8.9 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.”
- 8.10 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.

- 8.11 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.
- 8.12 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. Fundamentally this means in this circumstance 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.

## **9 Affordable housing, and the Mix of dwelling unit size**

- 9.1 The proposed development comprises a total of 34 residential units, made up of the following mix:
- 10 x 1-bedroom apartments
  - 12 x 2-bedroom apartments
  - 12 x 3-bedroom semi-detached houses
  -
- This mix includes a substantial proportion of family housing (35%), which supports the objectives of Policy 5 of the Havering Local Plan (2021) to provide a range of dwelling types and sizes to meet identified local needs, including for larger homes. The mix is also consistent with the findings of the Council's Strategic Housing Market Assessment (SHMA), which identifies a need for both smaller and family-sized dwellings within the Borough.
- 9.2 Policy H10 of the London Plan (2021) and Policy 5 of the Havering Local Plan seek to secure an appropriate housing mix that responds to local context, housing need, and site characteristics. The proposed combination of apartment blocks and family-sized houses reflects the site's transitional location at the edge of Hornchurch town centre and the surrounding suburban character, with 71% of the dwellings being 2 bed flats or 3 bedroom dwellings. The arrangement of units has been designed to optimise site capacity while ensuring a high standard of residential amenity and compliance with design-led density principles as set out in Policy D3 of the London Plan.
- 9.3 With respect to affordable housing, Policy H4 of the London Plan and Policy 4 of the Havering Local Plan set a strategic target of 50% affordable provision on public sector land, subject to viability. The applicant has submitted a detailed Financial Viability Appraisal (prepared by Turner Morum) which demonstrates that the proposed development cannot viably support on-site affordable housing provision but proposes an off-site financial contribution of £77,129. The Viability Appraisal has been reviewed independently on behalf of the Council and the conclusions accepted, subject to a late-stage review mechanism being secured through the Section 106 Agreement in accordance with the Mayor of London's Affordable Housing and Viability SPG (2017).

- 9.4 Whilst the absence of affordable housing is regrettable, it is considered acceptable in this case having regard to the submitted and independently reviewed viability evidence. The scheme will nevertheless deliver new high-quality family housing on previously developed land in a sustainable town centre location, supporting both local and strategic housing delivery targets.

## **10. Layout, scale, bulk and Design assessment**

- 10.1 The proposed development has been subject to a comprehensive design-led approach, shaped through detailed pre-application engagement with the Council's planning and urban design officers, as well as presentation to the Havering Quality Review Panel (QRP) in December 2023. The Panel concluded that the proposed scale and massing were appropriate for the context and recognised the potential of the scheme to serve as a benchmark for suburban housing-led regeneration in the Borough.
- 10.2 The site layout responds to the sites transitional character between the denser built form of Hornchurch town centre to the north and the lower-density suburban housing to the south and west. The scheme comprises a legible arrangement of perimeter blocks and a central shared-surface street, incorporating a mix of two- and three-storey buildings. The layout has been designed to ensure clear definition between public and private space, with good levels of natural surveillance and permeability. Proposed houses are aligned to face new streets and green spaces, while apartment blocks at the centre of the site take advantage of the open space and play space.
- 10.3 In terms of scale and bulk, the development ranges from two-storey semi-detached houses to three-storey apartment blocks, with variations in roof form and building articulation to reduce visual massing and integrate with surrounding residential typologies. The apartment blocks have been revised following QRP and officer feedback to simplify their form, improve entrance legibility, and strengthen their relationship with the public realm. The design avoids abrupt transitions in height and maintains appropriate building-to-building and building-to-boundary distances to preserve amenity and outlook for existing and future occupiers.
- 10.4 The architectural approach draws from local vernacular forms and materials, incorporating high-quality brickwork, articulated facades, and bay windows to create visual interest and character. The houses include recessed entrances, window reveals, and generous private gardens. Apartment blocks feature inset balconies and landscaped forecourts. Overall, the scheme is considered to represent a coherent and contextually appropriate design response, consistent with Policies D1, D3 and D4 of the London Plan, and Policies 7 and 26 of the Havering Local Plan, which seek high-quality, locally distinctive development that optimises site potential and contributes positively to place-making.

### Quality Review Panel Summary:

QRP Comment: The proposed height, massing and density are appropriate; potential for benchmark suburban scheme.

Design Response: Final scheme retains 2–3 storey height with careful modulation of massing to ensure a contextually sensitive suburban layout.

QRP Comment: Semi-detached houses are particularly successful and suit the character of the area.

Design Response: The final design retains the semi-detached house typology, with refined internal layouts and improved garden access.

QRP Comment: Apartment blocks A, B and C are overly complex; consider fewer typologies and simplified forms.

Design Response: Blocks A and B have been simplified in layout and articulation; architectural consistency has been improved.

QRP Comment: Split forms in blocks to address level changes create unnecessary complexity; consider stepped entrances or ground floor design.

Design Response: Level changes are now addressed through subtle regrading and stepped thresholds, avoiding overly fragmented building forms.

QRP Comment: Undercroft parking compromises quality and sustainability; should be removed.

Design Response: Undercroft parking has been omitted from the revised scheme; surface and on-plot parking used instead.

QRP Comment: Replace Blocks A and B with a single L-shaped block to enhance layout, carbon efficiency, and outlook.

Design Response: Blocks remain separate to retain permeability and scale appropriate to the suburban context; layout refined and landscaping enhanced.

QRP Comment: Apartment entrances are poorly defined; should be more prominent in elevation and urban design.

Design Response: Entrances have been repositioned and framed to enhance visibility, legibility and street-level presence.

QRP Comment: Green spine and play areas are poorly located and underused; green space strategy needs revision.

Design Response: Central landscape redesigned as a communal focal space; play areas reoriented for improved usability and supervision.

QRP Comment: Spur road south of Block C is underutilised; opportunity for additional green space missed.

Design Response: Spur road has been redesigned with shared surfaces, planting, and integrated SuDS to enhance amenity.

QRP Comment: Extend Bruce Avenue pavement into site; realign house boundaries to support street tree planting and legibility.

Design Response: Southern footpath extended and layout revised to support future adoption; trees relocated to public realm.

QRP Comment: Architecture of houses is strong; brickwork and bays effective. Keep detailing simple to avoid value-engineering.

Design Response: Detailing retained and simplified to ensure deliverability; bay windows and materials coordinated across typologies.

QRP Comment: North-east corner balconies on Blocks A and B are weak and overexposed; consider replacing with bay windows.

Design Response: Corner balconies replaced with bay features to improve visual impact and provide more practical amenity space.

QRP Comment: Front rooms in houses are constrained; consider simplifying stair layout to improve proportions.

Design Response: Internal layouts revised to widen front rooms by simplifying stair configuration and hallway footprint.

## **11 Quality of the housing provision**

- 11.1 Policy D6 of the London Plan stresses that, housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. And that the qualitative aspects of a development are key to ensuring successful sustainable housing.
- 11.2 The dwellings are provided with private gardens of adequate size and layout. All dwellings would comply with internal space standard. The proposal would also comply with Part M4(2) or M4(3) of the standard of mobility with respect to building control regulation.
- 11.3 Having regard to this arrangement, the proposed development would provide acceptable living conditions for future occupants in terms of light, outlook and privacy. It would comply with Policy 7 of the Havering Local Plan (2021) which seeks, amongst other things, to ensure developments achieve a high standard of amenity. The proposed development would also comply with the requirement of the Framework that developments seek to ensure a high standard of amenity for future users.

## **12 Impact on Neighbouring Amenity**

- 12.1 Havering Local Plan Policy 7 states the council will not support applications where the proposal results in unacceptable overshadowing, loss of

sunlight/daylight, overlooking or loss of privacy to existing and new properties and has unreasonable adverse effects on the environment by reason of noise impact, vibrations and disturbance.

### **Daylight and Sunlight**

- 12.2 A Daylight and Sunlight Assessment (prepared by GIA, dated October 2024) has been submitted in support of the application. The assessment has been undertaken in accordance with the methodology set out in the Building Research Establishment (BRE) Guidelines (2022 edition), and assesses the potential impact of the proposed development on neighbouring residential properties surrounding the site.
- 12.3 The results of the assessment confirm that the proposed buildings will not result in any material harm to the daylight or sunlight levels received by neighbouring properties. All surrounding windows tested — including those on properties along Dorrington Gardens, Bruce Avenue and The Avenue — either meet or comfortably exceed the recommended Vertical Sky Component (VSC) and Daylight Distribution (DD) targets. Sunlight availability to principal living room windows is also retained within acceptable levels in accordance with BRE guidance.
- 12.4 As such, officers are satisfied that the proposal complies with Policy D6 of the London Plan (2021) and Policy 7 of the Havering Local Plan (2021), which require development to avoid causing significant harm to the amenity of surrounding occupiers, particularly in relation to natural light and outlook.

### **Privacy and Overlooking**

- 12.5 The development has been designed to avoid direct overlooking of neighbouring properties. The layout provides appropriate separation distances between new and existing buildings, with a minimum back-to-back distance of 21 metres between rear-facing windows of the new dwellings and existing houses to the south and west. Side-facing windows serving circulation spaces are either obscured or recessed, and window placement has been carefully considered to minimise overlooking.
- 12.6 The two apartment blocks are positioned at the centre of the site, ensuring that their upper-level balconies and windows do not result in undue loss of privacy to adjacent private gardens. The detailed design and orientation of the blocks have been refined through the Quality Review Panel process to further mitigate any risk of overlooking.
- 12.7 On this basis, the proposals are considered to comply with Policy D6 of the London Plan and Policy 7 of the Havering Local Plan, which require development to respect existing residential amenity in terms of privacy, overlooking, and visual dominance.

## **13 Transport & Highways**

- 13.1 A Transport Statement (prepared by Transport Planning Practice, October 2024) has been submitted in support of the application. The Statement provides a comprehensive assessment of site accessibility, trip generation, parking, cycle provision, and servicing arrangements, and has been reviewed by the Council's Highways Team. The site benefits from a Public Transport Accessibility Level (PTAL) of 4, indicating good accessibility to public transport services, including six bus routes within 170m and two rail stations—Hornchurch Underground (District Line) and Emerson Park Overground—both within 1km walking distance. The surrounding area also benefits from a good-quality pedestrian and cycling network, and the site lies within walking distance of Hornchurch District Centre (400m).
- 13.2 Vehicular and pedestrian access would be provided via a new central access point from Dorrington Gardens. The development includes an internal shared-surface street layout with turning provision for refuse and delivery vehicles. Swept path analysis has been submitted demonstrating suitable manoeuvrability for service and emergency vehicles. Existing access points to the former car park will be closed, and redundant crossovers reinstated.
- 13.3 The proposal includes 24 car parking spaces, including 4 blue badge bays, which equates to a parking ratio of 0.71 spaces per unit. This is fully compliant with the London Plan (Policy T6.1) and Havering Local Plan Policy 24, which require a maximum of 0.75 spaces per unit in PTAL 4 locations. Parking provision has been reviewed through pre-application discussions and is considered to provide a suitable balance between supporting sustainable travel and managing potential overspill. The development will be subject to a Parking Design and Management Plan secured via condition.
- 13.4 Cycle parking is proposed in accordance with London Plan Policy T5 and Havering Local Plan Policy 24. A total of 64 long-stay cycle parking spaces are to be provided: apartment blocks will each include secure ground-floor stores with space for non-standard bicycles, and all houses will have private cycle stores accessed via gated side paths. Two short-stay visitor spaces will be located within the landscaped public realm.
- 13.5 Refuse collection and servicing will occur entirely within the site, with suitable access, turning and presentation arrangements for all unit types. Servicing is expected to generate up to four daily trips, predominantly by light goods vehicles. Swept path assessments confirm that LBH refuse vehicles and supermarket vans can access and egress the site safely.
- 13.6 Trip generation modelling using TRICS data for comparable edge-of-centre suburban sites estimates 9 vehicular trips in the AM peak and 7 in the PM peak, with total daily trips (all modes) expected to remain lower than the existing car park. The development will therefore result in a net reduction in local vehicle movements, particularly during peak hours and across the full day (estimated at -194 total trips). Walking, cycling and public transport impacts are considered negligible and capable of being absorbed by existing infrastructure.
- 13.7 Officers are satisfied that the proposed development would not give rise to unacceptable impacts on the highway network or transport infrastructure. The scheme complies with the sustainable transport objectives of the National

Planning Policy Framework (NPPF, 2024), Policies T1–T6 of the London Plan (2021), and Policies 23 and 24 of the Havering Local Plan (2021).

## **14 Other issues.**

### **Flood Risk & Drainage**

- 14.1 A Flood Risk Assessment and Drainage Strategy (prepared by Ardent Consulting Engineers, October 2024) has been submitted in support of the application. The site lies entirely within Flood Zone 1, as defined by the Environment Agency, and is therefore at low risk of flooding from rivers or sea. The site is not located within a Critical Drainage Area, nor is it subject to any recorded incidents of surface water or groundwater flooding.
- 14.2 In accordance with the requirements of the National Planning Policy Framework (NPPF, 2024), London Plan Policy SI 12, and Policy 32 of the Havering Local Plan (2021), a sustainable drainage strategy has been prepared to manage surface water runoff and maintain post-development runoff rates at or below greenfield levels. The submitted strategy includes the use of Sustainable Drainage Systems (SuDS) features such as permeable paving, cellular storage tanks, and attenuation crates beneath the shared surface road. Surface water will be discharged at a restricted rate to the public surface water sewer network via a new on-site connection.
- 14.3 Foul drainage will be discharged to the existing public foul sewer under a separate connection. Thames Water has been consulted and has raised no objection to the proposed drainage arrangements, subject to standard conditions to confirm final connection points and capacities at detailed design stage.
- 14.4 The Council's Lead Local Flood Authority (LLFA) has reviewed the submitted strategy and confirmed that the approach is acceptable in principle, subject to conditions requiring detailed drainage design, management and maintenance arrangements to be secured prior to commencement of development.
- 14.5 On this basis, the proposals are considered to comply with all relevant local, regional and national planning policy relating to flood risk and drainage, and do not give rise to any unacceptable risk to future or existing occupiers.

### **Land Contamination**

- 14.6 The site comprises previously developed land currently used as a surface-level public car park, and as such is not known to have accommodated any uses associated with high contamination risk. However, given the site's urban location and its historic use patterns, a Phase 1 Preliminary Risk Assessment (prepared by Ardent Consulting Engineers, October 2024) has been submitted in support of the application, in accordance with Policy D13 of the London Plan (2021) and Policy 33 of the Havering Local Plan (2021).



- 14.7 The report identifies a low to moderate risk of potential contamination from historic urban uses, including possible made ground and localised hydrocarbon residues from former vehicle movements. No significant contaminant linkages were identified at this stage. However, the report recommends that an intrusive site investigation be carried out to confirm ground conditions and assess any risks to human health, controlled waters, and construction workers.
- 14.8 The Council's Environmental Health Officer has reviewed the submission and raised no objection, subject to conditions requiring a Phase 1 and 2 site investigation, remediation strategy (if required), and a verification report to be submitted and approved prior to commencement of development. These standard conditions are necessary to ensure that the site is suitable for its proposed residential end use.
- 14.9 Subject to imposition of these conditions, officers are satisfied that the proposed development would not pose an unacceptable risk to human health or the environment. The proposal is therefore considered to comply with the relevant provisions of the NPPF (2024), London Plan Policy D13, and Local Plan Policy 33.

### **Sustainability & Energy Efficiency**

- 15.1 The proposal has been developed to meet the strategic objectives of the London Plan (2021) and the Havering Local Plan (2021) in relation to sustainable design, energy efficiency, and carbon reduction. Policy SI 2 of the London Plan requires major developments to be net zero-carbon, with at least a 35% on-site reduction in regulated carbon emissions beyond Part L of the Building Regulations (2013), and the remainder to be offset through a financial contribution to the borough's carbon offset fund. Havering Local Plan Policy 35 similarly seeks to ensure that all new development minimises carbon emissions, maximises energy efficiency, and contributes to the borough's climate change objectives.
- 15.2 An Energy and Sustainability Statement (prepared by Etude, October 2024) has been submitted in support of the application. The statement confirms that the development adopts a 'Be Lean, Be Clean, Be Green' energy hierarchy, consistent with the London Plan's policy framework. The strategy includes enhanced building fabric insulation (Be Lean), energy-efficient mechanical and electrical systems (Be Clean), and the integration of renewable energy technologies (Be Green), including air source heat pumps for all houses and apartment blocks, and photovoltaic panels on the roofs of the apartment blocks.
- 15.3 The Energy Statement confirms that the development will achieve an overall on-site carbon emissions reduction of 41% beyond Part L 2013 through passive design and renewable technologies. The remaining regulated carbon shortfall will be addressed via a carbon offset payment to the Council in accordance with the borough's adopted price per tonne, to be secured through the Section 106 Agreement.

- 15.4 In addition to energy performance, the scheme incorporates a range of wider sustainability measures, including water-efficient fixtures and fittings (targeting 105L/p/d), sustainable drainage (as outlined in the submitted FRA), and enhanced biodiversity through native species planting, ecological enhancements, and improved green infrastructure. All homes have been designed to achieve high levels of daylight, good ventilation, and future adaptability, contributing to long-term resilience and occupant wellbeing.
- 15.5 Officers are satisfied that the development achieves a high standard of environmental sustainability and is compliant with the relevant policy requirements of the London Plan Policies SI 2, SI 5 and D6, and Havering Local Plan Policies 35 and 32.

### **Ecology and Biodiversity**

- 16.1 The site comprises a hard-surfaced car park with limited existing vegetation, including a small number of scattered trees and low-value landscape features. The site is not subject to any statutory or non-statutory nature conservation designations and lies outside of any Site of Importance for Nature Conservation (SINC). As such, its existing ecological value is considered to be low.
- 16.2 In support of the application, the applicant has submitted a Preliminary Ecological Appraisal and a Biodiversity Net Gain (BNG) Assessment (prepared by Ecology Solutions, October 2024). The ecological appraisal confirms that no protected species or priority habitats are present on site and that the development is unlikely to give rise to any adverse ecological effects. The BNG Assessment has been prepared in accordance with the DEFRA metric and demonstrates that the proposed scheme will deliver a measurable net gain in biodiversity, in compliance with the requirements of the Environment Act 2021 and NPPF (2024).
- 16.3 The development incorporates a range of biodiversity enhancement measures, including native tree and shrub planting, wildflower-rich grassland, green infrastructure corridors, and integrated bat and bird boxes. The central landscaped area and reconfigured spur road incorporate permeable surfacing, SuDS features and soft landscaping designed to support habitat creation and ecological connectivity. Existing trees are to be retained where practicable and supplemented with additional planting to create a more robust and diverse green environment.
- 16.4 Policy G6 of the London Plan (2021) requires development to manage impacts on biodiversity and secure net gains where possible. Havering Local Plan Policy 30 similarly requires all development to enhance ecological resilience and incorporate biodiversity improvements proportionate to the scale and nature of development. Officers consider that the submitted information and proposed enhancements meet these policy objectives and will significantly improve the site's ecological function compared to the existing baseline.

- 16.5 A number of conditions have been recommended by The Council's Ecology Team to secure the implementation of the biodiversity enhancements and to ensure that final planting species and habitat types reflect those proposed within the BNG strategy.

### **Trees**

- 16.6 An Arboricultural Impact Assessment (AIA) and Tree Protection Plan (prepared by Hayden's Arboricultural Consultants, October 2024) have been submitted as part of the application. The AIA identifies a total of 15 trees and groups on or adjacent to the site. While a small number of low-category trees are proposed for removal to facilitate development and access, the majority of higher-quality trees will be retained and protected during construction. Replacement tree planting is proposed at a ratio exceeding 2:1, using native and climate-resilient species to enhance canopy cover and long-term urban greening. Protective fencing and ground protection measures will be secured by condition in accordance with BS5837:2012. Officers are satisfied that the scheme achieves a balanced and policy-compliant approach to tree retention, removal and replacement, in accordance with London Plan Policy G7 and Havering Local Plan Policy 27.

### **Air quality**

- 17.1 The site lies within the Havering Air Quality Management Area (AQMA), which covers the entire borough due to exceedances of national nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>) objectives, primarily from traffic-related sources. In accordance with Policy SI 1 of the London Plan (2021) and Policy 33 of the Havering Local Plan (2021), the application is accompanied by an Air Quality Assessment (AQA) prepared by Air Quality Consultants (October 2024).
- 17.2 The assessment confirms that existing air quality at the site is within acceptable levels for residential use and that the development will not lead to any significant increase in pollutant concentrations either on-site or in the surrounding area. Vehicle trip generation is modest and anticipated to be lower than the existing car park baseline. All residential units will be fitted with low-NOx boilers or air source heat pumps, and the scheme incorporates sustainable travel measures and electric vehicle charging infrastructure to reduce future emissions.
- 17.3 The Council's Environmental Health Team has reviewed the submission and raised no objection, subject to the inclusion of standard conditions to manage construction dust and ensure implementation of a non-road mobile machinery (NRMM) emissions strategy during the construction phase.
- 17.4 The proposals are therefore considered acceptable with regard to air quality and comply with the requirements of the NPPF (2024), London Plan Policy SI 1, and Havering Local Plan Policy 33.

### **Secure by design.**

- 18.1 In accordance with Policy D11 of the London Plan (2021) and Policies 7, 15 and 26 of the Havering Local Plan (2021), developments must incorporate

measures to design out crime and promote safe, inclusive environments. The applicant has engaged with the Metropolitan Police Designing Out Crime Officer (DOCO), and a formal consultation response was provided dated 23 January 2025. The Police have no objection to the proposed development, subject to the imposition of a Secured by Design (SBD) condition and the implementation of the site-specific recommendations provided.

18.2 The Police response acknowledges that early engagement took place with the applicant and design team, and that several principles of Secured by Design are already reflected in the submitted Design and Access Statement. Nonetheless, the DOCO has highlighted a number of areas where enhanced crime prevention measures should be incorporated, including:

- Robust 2.1m boundary treatments without footholds or climbing points.
- Controlled access vehicle and pedestrian gates with fob or proximity entry.
- Secure lobbies to apartment blocks with dual-door entry systems and encrypted fob access.
- PAS 24:2022 certified front doors, communal doors, and accessible windows.
- Secure external post boxes, smart meter placement, and CCTV to communal areas.
- Secure, well-lit and non-signposted cycle and refuse stores built to SBD standards.

18.3 The site lies within the St Andrew's Police Ward, where recent crime statistics (315 violence and sexual offences, 212 anti-social behaviour incidents, and 179 vehicle crimes in the past 12 months) indicate the importance of embedding preventative design measures from the outset. The proposals provide natural surveillance through active frontages and window placement, good lighting, and integrated landscaping that supports visibility and passive security.

18.4 A suitably worded planning condition is recommended, requiring that the development achieves full Secured by Design accreditation, with a certification of compliance to be submitted and approved prior to occupation. An informative is also recommended to encourage continued engagement with the DOCO during the detailed design and construction phases.

18.5 Subject to the imposition of this condition and implementation of the submitted design principles, the development is considered acceptable in terms of crime prevention and community safety and compliant with the relevant national, regional and local policy objectives.

## **19 EQUALITIES AND DIVERSITY**

19.1 Section 149 of the Equality Act 2010, which came into force on 5th April 2011, imposes important duties on public authorities in the exercise of their functions, including a duty to have regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

19.2 For the purposes of this obligation the term protected Characteristics includes: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

19.3 In recommending the application for approval, officers have had regard to the requirements of the Act and have concluded that a decision to grant planning permission for this proposed development will comply with the Council's statutory duty.

## **20 CIL and other Financial and Mitigation measures**

20.1 The net additional floor space would be 3187m<sup>2</sup>. The development would be liable for a Mayoral CIL at the rate of £25 per square metre amounting to £79,675 and Havering CIL at rate of £125 per square metre amounting to £398,375, subject to indexation. A request was made for a contribution to school places, however in the absence of a specific local policy such as the Planning Obligations SPD it would be difficult to justify such a contribution to school places.

20.2 The planning obligations recommended in this report have been subject to the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 and the obligations are considered to have satisfied the following criteria:-

- (a) Necessary to make the development acceptable in planning terms;
- (b) Directly related to the development; and
- (c) Fairly and reasonably related in scale and kind to the development.

## **21 Conclusions**

21.1 Section 38(6) of the Planning and Compulsory Purchase Act, 2004 outlines that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

21.2 The outcome of the Framework paragraph 11 d) process above indicates that the decision should be taken in accordance with the development plan.

- 21.3 The proposed development seeks full planning permission for the redevelopment of a former public car park to provide 34 new residential dwellings, with associated access, car parking, landscaping and infrastructure. The scheme will contribute positively to housing delivery in a sustainable, accessible location within the urban area and makes efficient use of previously developed land in line with national, regional and local planning policy.
- 21.4 The principle of residential development is strongly supported by the National Planning Policy Framework (NPPF, 2024), London Plan Policies H1, D3 and H4, and Havering Local Plan Policies 3, 4 and 13, which promote housing growth on under-utilised brownfield land. The site is well connected to local amenities and transport infrastructure and represents a logical opportunity for residential intensification.
- 21.5 While the scheme does not include on-site affordable housing provision, this position is justified by a Financial Viability Assessment (prepared by Turner Morum), which has been subject to independent review on behalf of the Council. The assessment concludes that the development cannot viably support affordable housing at this stage without compromising deliverability. In accordance with the Mayor's Affordable Housing and Viability SPG, a late-stage review mechanism will be secured via the Section 106 Agreement to capture any uplift in viability prior to completion. Officers are therefore satisfied that the proposal accords with Policy H4 of the London Plan and Policy 4 of the Havering Local Plan.
- 21.6 The layout, scale and design of the development have been informed by engagement with Council officers and the Havering Quality Review Panel. The scheme responds positively to local context, delivers a legible and attractive streetscape, and provides a good standard of residential accommodation. The development will not result in material harm to the amenity of neighbouring occupiers in terms of daylight, sunlight, outlook or privacy.
- 21.7 Technical matters including transport and highways, flood risk, drainage, land contamination, energy, ecology and crime prevention have been fully assessed and found to be acceptable, subject to appropriate conditions. A condition is also recommended requiring the development to achieve Secured by Design certification in consultation with the Metropolitan Police, to support community safety objectives.
- 21.8 Overall, the proposals are considered to comply with the development plan when read as a whole, and there are no material considerations that would warrant refusal. The development will deliver significant public benefits through the provision of high-quality housing, regeneration of surplus Council land, and urban greening. As such, the application is recommended for approval, subject to conditions and the prior completion of a legal agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) and all other enabling powers.