



**Havering**  
LONDON BOROUGH

**Strategic Planning  
Committee**

**28 August 2025**

**Application Reference:** P1765.23

**Location:** Land at Bridge Close, Romford.

**Ward** St Albans

**Description:** Hybrid planning application for 1) Full Planning Permission for the erection of three buildings comprising 383 residential units (Class C3); 1,911 sqm (GEA) of commercial floorspace (Class E use) and a 4,202 sqm (GEA) three form entry primary school and nursery (Class F1(a)); with the erection of a new pedestrian/cycle bridge; new vehicular and pedestrian arrangements; a new public square and civic square; new public realm works; and associated infrastructure and works incidental to the proposed development. 2) Outline Planning Permission with access to be considered for up to 687 residential dwellings (Class C3); community floorspace of up to 2,768 sqm (GEA) comprising a flexible health centre / commercial unit (Class E / F1 / F2) and a community centre (Class F1 / F2); up to 4,045 sqm (GEA) commercial floorspace (Class E use) comprising office and flexible workspace, retail use, professional services and leisure use; together with associated infrastructure, alterations to and provision of new vehicular and pedestrian access points; public open space, including a riverside walk; car, motorcycle and bicycle parking spaces and servicing spaces and other works incidental to the proposed development.

**Case Officer:** Richard Byrne

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

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

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

- The proposal aligns with the aims of the Romford Strategic Development Area and the Romford Area Action Plan, supporting the delivery of up to 1,070 new homes, including 35% affordable housing by habitable rooms. The development adopts a masterplan-led approach that integrates residential, commercial, educational, and community uses, with a strong emphasis on place-making, connectivity, and sustainability. The scheme includes a new primary school and nursery, flexible community and health spaces, and significant public realm improvements such as a civic square, riverside walkway, and a new pedestrian/cycle bridge over the River Rom.
- The design quality is a major factor in the recommendation, with 84% of habitable rooms in Plot A meeting or exceeding BRE daylight standards and 90% of homes designed to be accessible. The proposal also includes a robust flood risk and drainage strategy, biodiversity enhancements, and a commitment to sustainable transport through a largely car-free layout and improved pedestrian and cycle infrastructure. The development is considered to be in accordance with local and London Plan policies, and while some impacts on neighbouring daylight are acknowledged, these are considered to be outweighed by the significant public benefits of the scheme, including regeneration, housing delivery, and improved infrastructure. Existing community/infrastructure uses on the site that benefit from a permanent lawful use are safeguarded through either re-provision as part of the development or retention of site until alternate provision is available.

## **2.0 RECOMMENDATION**

**That the committee resolve to GRANT planning permission subject to:**

- Receipt of updated Flood Risk Assessment and confirmation from the Environment Agency that no objections are raised
- Any direction by the London Mayor pursuant to the Mayor of London
- Prior completion of a legal agreement to secure the following planning obligations and the planning conditions below, the detailed wording of which is delegated to the Director Planning. That the Director Planning is delegated authority to issue the planning permission subject to a legal agreement and imposition of the conditions [and informatives] below to secure the following matters:

### **Phasing Strategy**

- Phasing Strategy to be submitted and agreed;
- S106 obligations to take effect on phased basis;

### **Affordable Housing**

- 35% affordable units, with a tenure split of 30% Social Rent / London Affordable Rent and 70% intermediate.

- Of the total amount of affordable housing the Affordable Rent would comprise a maximum of 30.16% 1B2P, a maximum of 38.10% 2B3P, a minimum of 18.25% 2B4P, a minimum of 1.59% 3B4P and a minimum of 11.90% 3B5P.
- Early, mid and Late Stage Viability Review mechanisms to enable the tenure split of the 35% affordable housing to be provided on-site to be more policy compliant in terms of tenure of affordable housing (the policy seeks a 70:30 split between social/affordable rented housing and intermediate housing).

### **Highways/Access/Open Space**

- £1.6m Pedestrian, cycle way, highway and public transport improvements in the vicinity of the site, to be used for any of the following:
  - Improvements to Waterloo Road, Oldchurch Road, Atlanta Boulevard and Lidl car park;
  - Improvements to local bus facilities;
  - Wayfinding contribution;
- Provision of new Waterloo Road Highway Crossing;
- Before first occupation of Phase 1 – provision of bridge link over River Rom to Atlanta Boulevard
- To provide River Rom improvements in accordance with details
- Public access agreements for all non-adopted public access routes and space
- Maintenance of all non-adopted public access routes and spaces with appropriate Management Company arrangements
- Tenure blind access for residents to all communal amenity space
- A detailed scheme to show how public open space and play spaces are set out and enhanced to achieve policy compliance within each phase;
- Demonstration that sufficient enhancements, the public open spaces and play spaces can be provided cumulatively across the site to achieve policy compliance if provision falls short proportionally to the occupiers within a phase;
- Demonstration how the public open spaces and play spaces are brought into use and made available for future occupiers and members of the public during and post completion of 1) the relevant phase and 2) any adjacent phases which may have an impact in respect of public safety
- Contribution of £25,000 for traffic orders and enforcement measures required in connection with School Street
- Detailed strategy for school street to be agreed and implemented prior to school being open;

- The provision of 1 car club space on the site and 2 years free membership for future residents to the Car Club;
- Submission of Travel Plans covering the school residential and commercial elements of the scheme. The full travel plan should include car and cycle parking monitoring;
- The developer to ensure the effective implementation, monitoring and management of the travel plan for the site.
- Car free restriction on obtaining parking permits to be secured by agreement pursuant to Section 16 of the Greater London Council (General Powers) Act 1974.
- Contribution of £25,000 for consultation/assessment/implementation of a local Controlled Parking Zone on any adopted roads within the site
- £150,000 contribution towards feasibility study for rail impacts at Romford Station

### **Education**

- Provision on site of a new 3-form entry Primary School and Nursery
- If the proposed school and nursery cannot be delivered on site, then the applicant will pay a section S106 financial contribution towards education provision within the borough at £2,370,726.

### **Healthcare**

- £2,000,000 towards acute care in the Romford area
- To offer potential medical centre to NHS trust on reasonable terms, any alternate use only permissible if NHS confirms that accommodation is not required

### **Carbon offset**

- To pay the relevant carbon offset contribution to the local authority carbon offset fund pursuant to the approved Energy Assessment;
  - Estimated carbon offset contribution for detailed scheme = £249,706;
  - Estimated carbon offset contribution for outline scheme = £437,927;

### **Employment**

- A scheme to identify where a minimum of 10% total gross commercial floorspace as affordable workspace for a minimum of 5 years is within the development and a timetable of how it will be provided and its provision.
- Submission and approval by the council of a training and recruitment plan
- Submission and approval by the council of an education commitments Plan
- Provide Skills Training Roles for construction apprenticeships

- Secure that at least 20% for local suppliers during the construction.
- In the event that the skills training roles have not been achieved in relation to a phase and/or the target for employment to local residents are not achieved and/or 20% of local are not used to pay a Skills Training Shortfall Contribution and/or a local employment shortfall contribution and / or a Local supplier shortfall contribution prior to occupation of that phase using a formula

### **Commercial Uses**

- Provision on site affordable work spaces in accordance with Policy 21 of the London Borough of Havering's Local Plan 2016-2031
- If the proposed affordable work spaces cannot be delivered on site, then the applicant will pay a section S106 financial contribution towards affordable work spaces provision within the borough.

### **Community Facilities**

- Not to develop any part of the buildings and structures at 91 Waterloo Road unless either:
  - Provision and first use of a minimum of 722sqm floorspace on site as replacement facility for current place of worship
  - Provision and first use of suitable off site facility
- Provision of suitable access/parking to LAS site during/after implementation of Phase 1
- To provide an alternative site to accommodate the existing London Ambulance Service (LAS)
- Provision of a community use agreement for the MUGA

### **Land Ownership**

- On acquiring third party land, to enter into a supplemental S106 agreement to bind that land to the relevant planning obligations in the original S106 agreement

### **Legal Costs, Administration and Monitoring**

- Prior to completion of the S106 agreement the Council's reasonable legal costs to be paid by the developer to the Council associated with the preparation of the planning obligation (irrespective of whether the agreement is completed) and a further financial obligation (to be confirmed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligations.
- All contributions and fees to be subject to indexation using the BCIS (Building Cost Information Service) Index from the date of the S106 Agreement to the date of actual payment.

**Proposed Conditions:**

1. Time Limit (detailed part)
2. Reserved Matters to be Submitted
3. Timing of Reserved Matters Submission
4. Timing of Reserved Matters Commencement
5. Parameter Plans
6. Approval of Reserved Matters
7. Phasing Plan
8. Design Code
9. Site and Floor levels
10. Maximum number of residential units (1070)
12. Partial Discharge – Allows for Phasing of development
13. Approval of Materials
14. Access to Phases
15. Accessibility and Management Plan - Residential
16. Accessibility and Management Plan- Non-Residential
17. Accessibility of Public Realm
18. Car parking design and management plan
19. Occupier and Visitor Cycle Parking
20. Boundary treatments
21. Secure by Design
22. Accessibility and Adaptability – M4(2) and M4(3) housing
23. Refuse Storage and Segregation for Recycling/Refuse Collection Strategy
24. Energy strategy
25. Energy compliance
26. Overheating modelling

27. Urban Greening Factor
28. Biodiversity Enhancement Strategy
29. Accordance With Ecological Appraisal Recommendations
30. Construction Environmental Management Plan for biodiversity
31. Concurrent With Reserved Matters: Biodiversity Net Gain Plan
32. Concurrent With Reserved Matters: Landscape And Ecological Management Plan
33. Updated Signal design and traffic modelling
34. Further Surveys for Developments Phased over a Long Period
35. Living Roofs
36. Nesting Birds and Bat Roosts
37. Bird Hazard Management Plan
38. Protection of Trees
39. Vegetation Clearance
41. Air Quality Assessment
42. Ventilation Equipment
43. Noise levels from plant and machinery
44. Noise from site
45. Noise from mechanical ventilation
46. Road Noise
47. Hours of Operation- Non-Residential – 0700 to 2300 (Deliveries 0700 to 2100)
48. Lighting Strategy – including safety lighting for tall buildings
49. Flood Risk
50. Drainage Strategy based on SuDs Principles
51. Drainage Maintenance
52. Piling (including vibration) Method Statement
53. Non-Road Mobile Plant and Machinery (“NRMM”)

54. Oil Interceptors
55. Contamination Remediation Scheme
56. Unexpected Contamination
57. Construction Environmental and Site Waste Management Plan
60. Recycling and Waste Reporting
59. Whole Life Cycle Carbon assessment
60. GLA 'Be Seen' energy monitoring requirements
61. Demolition and Construction Hours (8am to 6pm Mon-Fri, 8am to 1pm Sat, none Sunday and Bank Holidays)
62. Foundation Design
63. Circular Economy Statement, monitoring report and completion report
64. Permitted Development Withdrawal, including use classes restriction to both residential and commercial
65. Satellite Dishes
66. Fire Safety
67. Daylight\sunlight
68. Cranes
69. Delivery and servicing plan for residential uses
70. Delivery and servicing plan for non-residential uses
71. Archaeology (Written Scheme of Investigation)
72. Archaeology (Display and Interpretation)
73. Water efficiency
74. Construction method statement
75. Updated commercial strategy
76. Retention of existing HICC (Havering Islamic Cultural Centre) facility at 91 Waterloo Road until Block D1 has been fully completed (should HICC require temporary accommodation on site)
77. Access to Ambulance Station (Phase 1)78. Updated LinSig analysis



79. Gateline Assessment

80. Revised Outline Construction Logistics Plan (CLP)

81. No development on 3<sup>rd</sup> party land until that land is bound by the relevant planning obligations

### **Informatives**

1. Planning obligations

2. Phases planning permission

3. Street naming and numbering

4. Thames Water

5. Lighting

6. Environmental Health – Gas

7. Written scheme of investigation (archaeology)

8. London Fire

9. Contaminated land

10. Refuse

11. Deemed discharge 1

12. Pre-commencement conditions

13. Highway legislation

14. Temporary use of the public highway

15. Adoption of roads

16. Surface water management

17. Highway approval required

18. Secure by design

19. Community Infrastructure Levy (CIL)

20. NPPF positive and proactive

### 3.0 SITE AND SURROUNDINGS

- 3.1 The Bridge Close site is located to the south of the London (Liverpool Street) to Colchester main railway line, Waterloo Road to the west, the River Rom to the east and Oldchurch Road to the south. It sits within the A1251 Romford ring road, which



Figure 1: Site Location Plan

effectively forms a boundary around Romford town centre. The whole site covers approximately 3.68 hectares (the detailed element covers 2.37 hectares) and comprises a mix of commercial properties located centrally and light industrial units along the eastern boundary, while the southern and western boundaries are marked by residential properties (facing Waterloo Road and Oldchurch Road).

- 3.2 The Havering Islamic Cultural Centre (HICC) is located in the northwest corner of the site adjacent to Waterloo Road. In the southeast corner of the site is the Romford Ambulance Station (RAS).
- 3.3 The River Rom, which flows along its eastern boundary has been canalised, resulting in a concrete-lined channel.

- 3.4 The site extends slightly beyond this river, particularly in its north-eastern corner, which includes a small strip of land across Atlanta Boulevard and part of the Lidl car park. A further area is included part way down the river to include an existing public footbridge which leads to the end of Regarth Avenue to the east.
- 3.5 Vehicular access/egress is in the south west corner of the site to a road that circles the site. This road serves as the main entry point for vehicles including the HICC and RAS.
- 3.6 To the east of the site, Atlanta Boulevard hosts a Lidl supermarket and gym as well as a bus stand area and car park, with nearby South Street and Victoria Road featuring a variety of ground-floor commercial uses, with residential properties situated above them. Further north and east from the site, beyond the main railway line and Romford Station is the town centre.
- 3.7 There are residential blocks on the west side of Waterloo Road facing the site and to the south is the Homebase retail store with the Seedbed Centre / Rom Valley Way Retail Park beyond.
- 3.8 The site is highly accessible to public transport and other services; it is 200 metres (12 minutes' walk) to Romford railway station, and has a PTAL rating of 6a.

#### **4.0 DESCRIPTION OF PROPOSAL**

- 4.1 This is a hybrid planning application where permission is sought in full for part of the site (hereinafter referred to as Phase I) and in outline for the remainder of the site.
- 4.2 The proposal has adopted a masterplan approach for the proposed development at Bridge Close. The masterplan approach:
- aims to develop a robust, legible urban quarter that integrates well with its surroundings, fostering a sense of place and community.
  - emphasises a mixture of uses, including residential, commercial, and community facilities, to support the local economy and provide quality of life for future residents.
  - seeks to reveal and incorporate historical landscape elements, such as the River Rom, by introducing public spaces.
  - focuses on improving pedestrian and cycling connections, creating a network that enhances accessibility and mobility throughout the area, ultimately reducing reliance on cars.
  - allows for phasing and future modifications, acknowledging the dynamic nature of urban development and ensuring the project's long-term viability.

- 4.3 The masterplan has been based on several strategic principles that guide its layout and functionalities, including establishing primary and secondary movement networks, public realm structures, and interlocking courtyards that enhance connectivity. Key parameters such as building heights, access points, and open spaces were defined in a series of parameter plans to guide the detailed design of individual development plots and ensure they align with overarching goals. This has all informed the design of the scheme under the hybrid application.

#### Proposed Phasing

- 4.4 Phase I principally covers the majority of the open spaces and includes residential Blocks A and B. Within the open space areas a new connection is proposed over the River Rom and a new signalised junction on Waterloo Road. The outline application would cover Block's C, D and E with the intervening spaces around the buildings. Figure 2 shows the hatched area where full permission is sought and the unshaded areas where outline permission is sought within the application site. Figure 3 is an indicative plan showing the development phases and the sequence in which the plots are being brought forward.



Figure 2: Area of full and outline permission



Figure 3: Indicative Phasing Plan

- 4.5 During pre-application discussions it was identified that this part of the site, comprising circa. 2,500 sqm (shown in figure 4), could be used for temporary meanwhile uses, until such time that this land is brought forward for redevelopment. The land would sit between the internal access road and the edge of Phase III. The applicant anticipates the land could include additional landscaped open space and erection of a temporary urban forest, temporary car parking, and informal playspace or event space including the potential for shared meanwhile use space. Any proposed temporary and meanwhile uses on the site will be subject to separate temporary planning permission.



Figure 4: Location of meanwhile use area (middle area of site)

- 4.6 It is intended that Phase 2 (blue and green shaded areas shown in figure 3) will accommodate Plots C1 and C2, Phase 3(a) will accommodate plots D1, D2 and Phase 3(b) will deliver Block E. Phase 3 has been split into two parts to ensure that there is no loss of social infrastructure resulting from the development. Phase 3(a) will first provide the new community facility before any demolition of buildings in Phase 3(b) is undertaken.

#### Proposal for Phase I (full application)

- 4.7 Phase 1 of the development includes the erection of two buildings (A1 and A2) on Plot A and one building on Plot B, providing a total of 383 residential units (Class C3). Additionally, Phase I includes 1,911 sqm (GEA) of commercial floorspace, a three-form entry primary school (Class F1a), and associated infrastructure and public realm works. The housing mix consists of various unit types, including affordable rent, shared ownership, and private dwellings.

#### *Proposed residential and commercial uses*

- 4.8 The breakdown of home size across Block's A1, A2 and B are shown in table 1. The homes would meet the minimum space standards as set out within the London Plan (2021) and the Mayor's Housing Design Standards (June 2023). 90% of the residential units are designed to Building Regulations requirement M4(2) 'accessible and adaptable dwellings, whilst the remaining 10% are designed to Building Regulations requirement M4(3) 'wheelchair user dwellings'. In total, 51% of the residential units in Block A and 40% in Block B are either dual or triple aspect.



Table 1: Total Phase 1 Residential Unit Mix (Plot's A and B)					
Unit Type	Affordable Rent	Shared Ownership	Private	Total	Unit %'age
1B2P	11	27	98	136	35
2B3P	15	33	45	93	24
2B4P	7	16	95	118	31
3B4P	1	1	0	2	0.5
3B5P	5	10	16	31	8.8
3B6P	0	0	1	1	0.2
4B6P	0	0	1	1	0.2
4B7P	0	0	1	1	0.2
Total	39	87	257	383	100

4.9 Within Phase I Plot A will be private sale homes and Plot B will be delivered as affordable housing. Phase I will overall provide 35% affordable housing by habitable room which equates to 374 affordable habitable rooms in total. Within Plot B, there are 39 affordable rented units in the southern core of the Block at Levels 1-4 (118 habitable rooms) and then 87 shared ownership units in the northern core of Levels 1-4 and across entire Levels 5 – 8 (256 habitable rooms).

4.10 Within Phase 1, permission is sought for 1,911 sqm (GEA) of commercial floorspace (Class E use). The proposed commercial offer will comprise flexible floorspace for shops, financial and professional services and restaurants and cafes. The commercial spaces are proposed on the south and east side of the lower and upper ground floor of Block A1. Further commercial space is within the northern and western side of Block B. The proposed retail and food and drink uses have active frontages and public realm access to animate the building and immediate external spaces.

#### *Proposed primary school and nursery*

4.11 It is proposed to erect a new 3-form entry Primary School and Nursery (4,202 sqm, GEA) along the eastern boundary of the site. The nursery is within the southern side of the ground floor of Block B where the primary school comprises a detached building sitting between block B and C1. This will provide teaching space for approximately 695 pupils split as follows:

- 630 Primary School Places (5 - 11);
- 47 Nursery Places (2 - 4);
- 18 Places for SEND pupils (2 - 11)

4.12 The School facilities; Sports Hall, Multi Use Games Area, Auditorium and Teaching rooms will all be available for use by the local community through a managed system, led by the school.

#### *Proposed built form*

- 4.13 The masterplan proposes a strategy with taller buildings to the north of the site. Block's A1 and A2 have been designed as a pair sharing an identical design language, characterised by facades of light coloured brick and integrated metal balconies. The buildings' envelopes are articulated in plan to follow the plot's irregular boundary. They are designed to rise to the maximum height of 14 and 9 storeys with a shoulder at Level 8 for A1 and at level 7 for A2.
- 4.14 Block B is rectangular in plan sits to the south of Block A facing the intervening open space to its north, River Rom to the east and internal road to the west. The building rises to 9 storeys, stepping down to 8 storeys along the frontage of the internal access road. The block features a central landscaped courtyard at ground level flanked by the building and includes commercial spaces and a nursery on the ground floor.
- 4.15 The proposed school is L-shaped in plan set over four storeys which is designed to harmonise with the adjacent Block B, but is still read as a distinctly civic entity. This is achieved through a shared material but distinct articulation and composition to differentiate the two uses.

#### *Architecture and materiality*

- 4.16 The appearance of the development has been designed to feature staggered building frontages to improve views and daylight access, interlocking courtyards for connections between semi-private and public spaces, and decorative brickwork patterns to enhance wayfinding and highlight main entrances. The proposed materials for the development include a combination of brickwork, metal cladding, and glazing.

#### *External areas*

- 4.17 Phase I delivers significant parts of the overall landscape and public realm within the Bridge Close proposal. This would include the construction of the bridge over the Rom, a civic square (adjacent to the school entrance) and a main public square (between block B and the shared pedestrian / cycleway connection between Waterloo

Road and the bridge), partial completion of the Rom Walk (including naturalised river bank), street enhancement along Bridge Close and Neighbourhood St. north and east.

- 4.18 In terms of quantum 0.9095 Ha within Phase I is shown to be free of buildings and carriageway where 0.071 Ha is publicly accessible playable space.
- 4.19 The open space has been placed into character areas to respond to specific locations, landscape relationships, building scale and predominant activity.
- 4.20 The existing western river wall of the River Rom will be broken out and replaced with a partially naturalised riverbank. A walkway is proposed to comprise a shared cycle and pedestrian route on the western bank of the River Rom, which is also to be used for occasional vehicular servicing and fire access. Entrances to the school/nursery and homes within plot B and commercial units at either end, have been designed to link into the walkway to maximise the levels of footfall along the River Rom. This will help to promote it as an active and safe environment. The Rom Walkway features two trim trails, seating and groups of riparian trees species, which help to visually break up the linearity of the river corridor.

#### Access

- 4.21 Vehicular access will be provided by a one way access road at the south of the site, from the existing access point from the Oldchurch roundabout. Primary vehicular access will generally run through the middle of the site with drop off points to be provided along the primary vehicular circulation route. A new left turn only egress route onto Waterloo Road will be created in conjunction with the proposed pedestrian crossing.
- 4.22 The new internal road would follow the school street approach where this would temporarily restrict vehicle movement through the site during drop off and collection time for the school.
- 4.23 A new-shared pedestrian/cycle bridge is proposed in the north-eastern corner of the site which would connect Atlanta Boulevard in the east to Union Road in the west. The bridge would cross the River Rom to enable pedestrians and cyclists to use the interconnecting ramp which links to the new access road and signalised crossing over Waterloo Road. This would increase connectivity with the existing areas to the west and provide better access between the site and Romford Station and town centre, as per the Council's aspirations.



- 4.24 An existing footbridge between the site and Regarth Avenue which crosses the River is proposed to be removed.
- 4.25 Outside of the application site, new surface crossings are proposed on Oldchurch Road to the south and Waterloo Road to the west. This is intended to mitigate the work to the Oldchurch Roundabout and connect the site to the wider road and pedestrian network.

### *Parking*

- 4.26 A total of 16 car parking spaces are proposed, which includes 15 accessible spaces in Plot A podium and 1 car club space on the northern boundary. Access to both the car parks will be controlled and limited to people who will have a right to use the parking spaces.
- 4.27 All long stay cycle parking bays will be provided within secure and sheltered locations, whilst short stay spaces will be provided within eyesight of building entrances. Furthermore, a total of 5% of the long stay spaces will be oversized spaces to accommodate larger bicycles. Within the ground floor of Plot B there is also parking provision for mobility scooters, with space for 3 scooters. Cycle parking spaces will be provided in accordance with the minimum cycle parking standards contained within the London Plan and is set out below:

Table 2: Phase I Cycle Parking				
	Plot A		Plot B	
	Long Stay	Short Stay	Long Stay	Short Stay
Residential Homes	422	8	314	6
Commercial Units	24		12	2
Nursery and School	---	----	52	10
Total	446	8	378	18

### *Delivery & Servicing*

- 4.28 The delivery and servicing strategy for the proposed development uses the internal road network. A total of four loading bays are included within the scheme, two to the west of Plots A and B, and two to the south of Plots D & E. Each loading bay will be able to accommodate a vehicle up to 12m long and will ensure that such vehicles do not interrupt the flow of traffic within the site.

### Proposal for the Development in Outline (Phases 2 and 3)

- 4.29 Outline permission is sought for up to 687 dwellings spread across the remainder of the site. As the precise mix of units has yet to be fixed, the table below provides an indicative unit mix across the outline area:

Table 3: Total Outline Residential Unit Mix (Plot's C, D and E)			
Unit Type	1B2P	2B3P / 4P	3B (4P – 6P) and 4B (6P – 7P)
All	41%	47%	12%

- 4.30 All homes would achieve the minimum space standards and 90% would be designed to meet Building Regulations for accessible and adaptable homes, 10% to be wheelchair adaptable.
- 4.31 The outline would provide 35% affordable housing across phases 2 and 3 where a tenure mix comprising 70% intermediate and 30% affordable rent.
- 4.32 Across Phases 2 and 3 the proposed commercial offer (a maximum of 4,045 sqm) will comprise floorspace for shops, financial and professional services and restaurants and cafes which will mainly be at ground floor. The proposed Class E use will also provide leisure uses, business and employment floorspace comprising office and some light industrial floorspace. It is envisaged that this floorspace will be used flexibly to replace the gym and provide a range of uses including creative maker spaces and opportunity for smaller, start-up business.
- 4.33 The Outline Component will comprise up to 2,768 sqm (GEA) of community floorspace, comprising a flexible health centre / commercial unit (Class E / F1 / F2) and community centre, indicatively located in the southern part of the proposal to be delivered in the future phases of the development. Figure 5 shows how the different uses are spread out over the whole site (which includes the full and outline proposal)



Figure 5 Ground Floor Uses

### Parameters

- 4.34 Phase 2 (plots C1 and C2 taken from figure 2) are located in the southern part of the site adjacent Oldchurch Road and Bridge Close. The heights indicated show up to fourteen storeys facing Oldchurch Road with five storey facing the proposed school and an eleven storey shoulder facing Bridge Close.
- 4.35 Phase 3 Plots D1/D2 is straddled between Bridge Close within the site and Waterloo Road to the west. The maximum height of blocks D1/D2 is 10 storey punctured with lower storeys along Bridge Close (5 and 8 storey) and within the block itself (ranging between two up to seven storey).
- 4.36 Phase 3 Plot E is located in the northwest corner of the site adjacent Waterloo Road and the railway line. The block would have a maximum of 13 storey with two shoulders of nine storey (on the south side) and 11 storey (on the north side).

### Access (indicative)

- 4.37 The access for the outline components of the application are taken from the routes shown on the masterplan and part of the full element of the application.

### *Parking (indicative)*

4.38 The scheme would provide 21 blue-badge spaces in Plot D, 6 on-street blue-badge spaces adjacent to Plot C and 1 on-street car club space. Parking spaces are primarily located within a 50-metres of building entrances and where distances exceed this threshold, resting places have been incorporated into the layout. The current proposals are for 20% active EV charging provision and the remaining spaces will be passive provision.

## **5.0 PLANNING HISTORY**

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

### 9 Bridge Close

P1969.20 - Retrospective change of use from Use Class B1 to Use Class D1 - a Place of Worship and Assembly. Granted 10 October 2023. Note: The use of the premises as a place of worship and assembly shall be for a limited period only expiring on 1st April 2025 on or before which date the use shall cease

P0246.19 - Retrospective change of use from B1 to D1 - a Place of Worship and Assembly. Granted 23 May 2019. Note: The use of the premises as a place of worship and assembly shall be for a limited period only expiring on 31st December 2020 on or before which date the use shall cease.

### 12 Bridge Close

P0368.21 - Change of use from industrial use to a commercial production kitchen with extraction flue system and external storage area. • Temporary permission for a period of five years, ending on 9<sup>th</sup> July 2026.

P1934.22 - Temporary change of use to part of building from car mechanics (Use Class E) to a place of worship (Use Class F1) (Retrospective). Note: The use of the premises as a place of worship (Use Class F1) shall be for a limited period only expiring on 1st April 2025 on or before which date the use shall cease.

### 13 Bridge Close

P1836.21 - Variation of Condition No. 1 to extend the use of the premises as a place of worship and assembly hall to 31/12/2023 of planning application P1437.20. Granted 30 March 2022. Note: The use of the premises as a place of worship and assembly shall be for a limited period only expiring on 31st December 2023 on or before which date the use shall cease.

P1437.20 - Variation of Condition No.1 to extend the use of the premises as a place of worship and assembly hall from planning application P0174.19. Granted 27 November 2020. Note: The use of the premises as a place of worship and assembly shall be for a limited period only expiring on 31st December 2021 on or before which date the use shall cease.

P0174.19 - Variation of Condition No. 1 of planning permission for use of premises as a place of worship and assembly originally granted by way of enforcement appeal (ref: APP/B5480/ C/11/2155474) and subsequently renewed by way of variation of condition (ref: P1763.17) P1763.17 Conditions(s) 1. Granted 1 April 2019.

P1763.17 - Variation of Condition No. 1 of planning permission for use of premises as a place of worship and assembly originally granted by way of enforcement appeal (ref: APP/B5480/ C/11/2155474) and subsequently renewed by way of variation of condition (ref: P1628.16). P1628.16 Conditions(s) 1. Granted 27 March 2018.

P1628.16 - Variation of Condition No. 1 of planning permission for use of premises as a place of worship and assembly originally granted by way of enforcement appeal (ref: APP/B5480/ C/11/2155474) and subsequently renewed by way of variation of condition (ref: P1529.14). Granted 7 December 2016.

P1529.14 - Variation of Condition No. 1 of planning permission for use of premises as a place of worship and assembly granted by way of enforcement appeal (ref: APP/B5480/C/11/2155474) to extend the use to 31/12/2017. Granted 30 December 2014.

### 91 Waterloo Road

P1341.24 - Variation of Condition 2 of (Application ref. P0222.22) to allow for temporary extension of hours / during the month of Ramadan. Granted 2 December 2024. Condition limits hours of operation of 7am to 9.30pm, from 1 January 2028.

P0363.24 - Condition No. 4 (Operating Hours) of Planning Permission Ref: P1285.06 (Change of use to a Community Centre (Use Class F1(f)), and alterations to external elevations.) Granted 01/03/2007. Granted 10 May 2024.

P0222.22 - Variation of Condition No. 4 (Operating Hours) of Planning Permission Ref: P1285.06 (Change of use to a community centre (Use Class F1(f)), and alterations to external elevations.) Granted 01/03/2007. Granted 8 April 2022.

P1285.06 – Change of use to a community centre (use Class D1) and alterations to external elevations. Granted 1 March 2007.

## **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 from 2017. The applicant has entered into a Planning Performance Agreement (PPA) with the Council to formalise the pre-

application stage of engagement in respect of the proposals. Pre-application discussions have taken place with Council officers, TfL, the Greater London Authority (GLA) and other statutory consultees under the terms of the PPA.

- 6.2 Officers agree that the site comprises previously developed land and the principle of a mixed-use residential led development is acceptable subject to the application submission demonstrating that density, massing, height layout, access and landscaping are acceptable. In respect of the design of the proposals, the scheme has also been subject to post submission discussions with Officers as well as reviews by the Quality Review Panel. Officers expressed throughout the pre-application process that the layout arrangement, quantum and quality of the development, detail of the improvement / naturalisation of the River Rom, improvement, creation and integration of access routes will carry significant weight in the determination of an acceptable proposal.
- 6.3 The proposal was presented to the Havering Quality Review Panel on three occasions with the latest on Thursday 5th September 2019. A number of positive changes to the overall masterplan concept have been incorporated into the final scheme - a number of elements relating to the proposal were made to the scheme prior to submission, as well as further amendments post submission requested by the council's design officers. As such the scheme has evolved with positive changes following the Quality Review Panel in order to address comments made. The final QRP comments are summarised below with the Applicant response.

Summary of QRP Comments and Applicants Responses – 20 <sup>th</sup> June 2019	
QRP Comment	Applicant Response
Summary	
The QRP strongly supported the principle of a high-density residential-led scheme within this accessible town centre location and within the Romford Housing Zone. However there was initially some concerns about the quality of the spaces and homes created at the level of density proposed, particularly from a sun and daylight perspective.	During the spring 2019 the design team worked closely with GIA Daylight/Sunlight consultants, producing iterative design options to make sure of good levels of sun and daylight across the masterplan. This resulted in the reduction of height around the primary school as well as the re-orientation of some buildings to open up spaces towards the south-west.
The QRP also supported lower heights of the central section of the site. Attempts to mitigate overshadowing have been largely successful, but the panel feels that the need to do so has led to a scheme	The applicant has demonstrated a strong commitment to delivering a high-quality, high-density environment, with particular emphasis on achieving excellent levels of sunlight and daylight. This

that is led by daylight modelling rather than by creating a sense of place.	design priority has been a central driver in the evolution of the masterplan. Importantly, this focus has not come at the expense of placemaking. Key refinements, such as the introduction of interlocking open courtyards, reflect a clear ambition to create a place with a distinctive and memorable character.
The QRP questioned whether the area around the school would make a better public square than the proposed location to the north and encouraged exploration of the potential to create a secondary civic space by the school.	A secondary open space has now been created adjacent to the school and health centre.
The QRP questioned the decision to remove the existing bridge at the end of Regarth Avenue as they felt that it provides a valuable connection into the heart of the site and is a continuation of Regarth Avenue. The panel felt that how the proposals integrate with the existing, and likely future street grain, to the west was of significant concern.	The existing bridge is informal and does not meet DDA standards. The team felt that an area for a second bridge should be safeguarded to the south of the school, to be delivered as/when the sites on the opposite side of the river comes forward for development. This would better align with the surrounding street pattern and wider connectivity. This approach was discussed and agreed with officers and well supported at public consultation events.
The QRP felt that the proposed arrival through the LIDL car park was underwhelming and asked the team to demonstrate how delivery of development and public realm in the wider area could come forward in a positive, high quality manner and ensure the bridge facilitates and does not prejudice future high quality development on all development sites to the west of the Rom within the Ring Road.	Public realm proposals were developed to include the bridge landing point at the eastern side of the River Rom.
The approach to the public realm has not yet produced an optimal solution, with the space created along	The scale of space along Waterloo Road is driven by the constraint of the existing water main. It therefore



<p>Waterloo Road relatively generous for an exposed part of the site, and the scale of investment along the Rom disproportionate to likely use. Greater thought is needed about how to integrate and activate these spaces.</p>	<p>provides the opportunity to plant a significant number of trees to help mitigate the impact of Waterloo Road on the development.</p> <p>This area forms the edge of the development, These are a sequence of spaces accessible to pedestrian and cyclists, with active uses on the ground floor, supported by changing landscapes.</p> <p>Key buildings with community uses provide a strong civic and cultural presence here. Retail and commercial uses on ground floor, providing active frontages and an overlooked edge for the development.</p> <p>The investment into the River Rom is based on improving flood capacity, enhancing biodiversity as well as providing a pleasant walking and cycling environment. It is also potentially part of a longer riverside path network. Additional entrances and uses have been positioned along the River to ensure it is as active as possible.</p>
<p>While the panel supports the principle of non-residential uses at street level, it questions whether the envisaged mix and quantum of maker spaces and offices is viable, or would create the kind of street activity that would make for a vibrant neighbourhood.</p>	<p>The proposed frontage onto the new internal street, Bridge Close, was reviewed and ground floor homes with individual front doors were introduced in the area around the school to aid with activation and positive surveillance.</p>
<p>Overall Approach</p>	
<p>Creating a sense of place in a heavily constrained site, which has to accommodate a lot of development and uses, remains a challenge. The QRP is supportive of the intention to create a Design Code for subsequent</p>	<p>The applicant has submitted a comprehensive Design Code in support of the application.</p> <p>The Design Code aims to ensure the delivery of a coherent and high</p>



phases, to provide confidence that later phases of the site will be to a high quality and will create a coherent sense of place.	quality development throughout all future phases. It provides a framework within which architectural diversity can be achieved and where the public realm is an integrated element which provides continuity with the surrounding area.
The detailed design work for the two plots in Phase 1 will be an important guide to the tone of the Code, but this should be based on the fundamentals of the design work rather than specific items of detail.	<p>The Design Code has been developed in parallel with the detailed designs for Plots A and B and the adjoining public realm.</p> <p>The detailed proposals in Phase 1 help to establish 'proof of concept' for the site-wide master-planning principles and underpin the design guidance in the Design Code.</p>
The QRP were concerned that the phasing of development risks resulting in a place that lacks coherence, and careful thought will be needed to ensure that the diverse elements combine to create a cohesive new place. They felt that achieving the right balance between coherence and diversity in the architectural expression will be essential and that the buildings in phase 1 therefore are critical in setting a benchmark for the evolving Design Code for future plots.	The applicant design team agreed with this comment and a cross practice design workshop was held. This covered multiple aspects of design expression/ coordination between the detailed plots, and with the future phases. The design code heavily draws on the design of the Phase 1 buildings, establishing principles to inform the design of future phases without being too prescriptive.
<b>Layout and Masterplan</b>	
The QRP expressed concern about restricted height of the scheme (14 storeys), arguing that increased height in certain areas might allow for improved relationships between proposed residential blocks as well as an improved setting for the other land uses on site, in particular the school.	Through design development the design team explored different approaches to this with the conclusion that a mid-rise high density scheme combining a contemporary version of the mansion block with taller buildings at the north and south end of the site was the most appropriate solution for the site.
This intensity of use makes essential a very high quality of resolution, in	The detailed design of Phase 1 has undergone multiple rounds of consultation with the SPC, the QRP,

terms of detailing, public realm and in creating real sense of place.	<p>and the Council's Design Officers over several years.</p> <p>The Phase 1 proposals set a clear benchmark for the overall scheme, demonstrating the expected design quality and serving as a proof of concept for the outline elements of the development.</p>
The QRP accept the rationale of locating the new bridge connection to the north of the site, as this creates a more strategic cycle route, but questions whether a bridge link to Regarth Avenue could not also be maintained.	As set out above, the existing bridge does not meet current DDA standards and are proposed to be demolished as part of these proposals. This will be replaced by a new, larger bridge to Atlanta Boulevard.
The QRP welcomed the inclusion of school entrances, along the river frontage, as this will go some way to activating this stretch of public realm.	The applicant explored multiple options for access strategies across the site. The current proposals include access to the nursery from the Rom side. This approach enables end users to develop management strategies that best suit their cohort and timetable as well as providing activation of the river walk.
Similarly, it feels that inviting the wider community into the building when the school is not in operation is a positive move, and it would like to see further investigation of the potential for making the playground more open.	The Illustrative Ground Floor Masterplan (Ref. 1396-FPA-ZZ-ZZ-DR-U-16010 Rev P03) earmarks parts of the school to be made available for community groups out of school hours.
<b>Connectivity</b>	
The QRP were uncertain about the primary vehicle access to the scheme being from the roundabout, particularly as this reinforced the significant barrier between the scheme and future development to the south.	<p>Following the QRP presentation in December the team explored the potential for vehicular access via the continuation of the central street to the south, ending on Oldchurch Road. Given the proximity to the roundabout vehicular access at this point is undeliverable, but a legible pedestrian access point is being provided.</p> <p>The team has been liaising with Havering's Liveable Neighbourhood</p>

	team. Their proposals see the roundabout reduced in size with more space for pedestrians.
The QRP had concerns about connections into the site through the railway tunnel to the north. The tunnel currently kicks out towards the road adjacent to the northern boundary of the site. They asked that the design team explore ways to improve the northern approach to the site.	The designs of the approach to the site from the north was reviewed, resulting in the widening of the approach to the tunnel and a sub-division of the most northern plot.
<b>Public Realm, Landscaping and Amenity Space</b>	
Given the tightness of the site, the QRP felt that the detailing of the public realm is critical. Without the luxury of space, generosity would need to be provided in terms of design and detailing. This is key to the integration of the different elements that make up the site.	This was taken on board by the design team. The public realm proposals have been further developed since the review with more detail and resolved public realm design.
The apparent loss of most of the active uses on the frontage to the Rom suggested that this public space was underused and marginal to the scheme. Given the limited opportunities for creating public space within the site, this seemed to be a missed opportunity and the panel wanted to see greater thought and investment in making this a pleasant and useful place to be.	<p>The public realm proposals for the River Rom has been further developed by the applicant and subject to multiple design iterations.</p> <p>The investment into the River Rom is based on improving flood capacity, enhancing biodiversity as well as providing a pleasant walking and cycling environment. It is also potentially part of a longer riverside path network.</p> <p>Since the review the proposals as the regards the River Rom have been strengthened through several moves:</p> <p>Additional entrances and uses have been positioned along the River to ensure it is as active as possible.</p> <p>Variation of the shared path width</p> <p>Inclusion of trees and trim trail equipment along the Rom</p>

<p>The QRP welcomed the introduction, through the school playground, of planting into the heart of the development and wanted to see this maximised. A high-quality street edge to the site was therefore essential, and the panel would have liked to see a solution that allowed for the greatest degree of visual connectivity that was consistent with safeguarding factors. A high-quality fence that allowed for views into the landscaped playground from the street was considered optimal.</p>	<p>The team has explored options to split the massing with a street width gap at ground floor, introducing a line of sight through the playground to the river. The design of the street and the fence to the school playground has been developed. The scheme proposes vertical bar railings. The applicant recognises that to maximise school play space it is important that this remains in the school demise.</p>
<p><b>Residential Blocks – Plot A</b></p>	
<p>On Plot A, the QRP encouraged continued refinement of the massing, differences in heights, and the repetition of elements of the facades – to ensure that these buildings were as elegant as they could be.</p>	<p>The massing strategy has been extensively explored by the applicant and subject to comments made by the Council's internal consultees as well as statutory consultees, including the GLA.</p> <p>A series of amendments to the application have been prepared by the Applicant team to address the comments raised and to ensure that the scheme continues to be fully acceptable and in accordance with relevant policy and guidance.</p> <p>The scheme has been developed further post submission to respond to further design and technical due diligence and in response to emerging regulations.</p> <p>The massing proposals for the buildings have been revised to respond to these comments in a number of ways:</p> <p>Building A1 (adjacent to the River Rom) steps down further towards the river – the shoulder height is now two storeys lower (Level 8) than presented at the QRP. This height more closely relates to the scale of the existing building on the</p>

	<p>other side of the river (Charrington Court) and produces a more elegant elevation to the public square to the South.</p> <p>The upper level volume of this building has also been refined to ensure greater articulation to this prominent facade in views approaching the site from the East.</p> <p>Building and balcony alignments around the courtyard have also been adjusted to increase repetition and to reinforce the spatial definition and coherence of this key space.</p> <p>The design of the northern facades to the buildings - which might be considered the 'back' of the buildings but which have townscape prominence in views from the railway line and station - have been significantly reconsidered to introduce a greater degree of order and repetition to the facades, and a stronger relationship between the two buildings.</p>
<p>The QRP was also concerned that the decision to use a single core for the block to the west of this plot had created overly-long corridors.</p>	<p>This issue was discussed with officers at pre-app meetings in 2019 and alternative options (with more than one core) were tabled. It was agreed that the proposals for a single, generous core - with daylighting to both the staircase and lift lobby - provided a high-quality solution that mitigated the length of the corridors, and on balance represented the best solution for this particular building.</p> <p>Subsequent to this, the design of the building has been revised to integrate a second lift and stair core in response to emerging fire safety regulations (draft BS9991 - 'Fire safety in the design, management</p>

	and use of residential buildings') - whilst maintaining a single entrance for identity and legibility.
The QRP welcomed the attempt to respond positively to the significant changes in levels at the base of the two blocks, but felt that a better understanding of how the podium worked three-dimensionally was essential.	The design team has prepared a number of new views to illustrate the interface between the landscape and buildings in this area of the scheme. In addition, a physical model (scale 1:333) has been built to support the final application, which provides a clear 3-dimensional understanding of this part of the scheme.
In particular, the entrances to and movement sequences around the bike stores were convoluted and further thought was needed to resolve this.	The design team has been through an exercise looking at alternatives for the location of and access to cycle parking. It was collectively agreed, with officers, that cycle parking at the lower ground floor was better as it provides more straightforward access for people arriving by bike. Subsequent to this, the design has been developed to rationalise the organisation of the cycle parking and to simplify as much as possible the movement sequences between the point of entry and the cores which provide access to the upper floors of each building.
<b>Residential Block – Plot B</b>	
The entrance sequence from the street into the courtyard of the residential block was very accomplished, and the QRP felt that enhancing views into the courtyard from the street should have been explored further to make the most of this feature. However, the entrance onto the Rom was expected to be supported by high-quality public realm.	Wide, splayed reveals have been added to entrances, opening up views into the courtyard from Bridge Close and the Rom Walkway. Tree planting and seating has been coordinated on the Rom Walkway to enhance the residential entrance.
The QRP notes that the internal layout of Plot B was also successful. However, the panel encouraged further exploration of the effect that	Following design comments, these areas have been redesigned. The residential entrances now sit within an elevation of commercial uses,

<p>the overhang at podium level and the walkways on the western internal elevation would have had on the quality of the external space.</p>	<p>identified by generous glazed openings. The residential entrances therefore need definition through a greater level of depth and articulation rather than relying simply on transparency.</p> <p>Mansion court entrances were often articulated through the use of feature stone work, stepped plans and framing elements. Each of these gestures were explored through an extensive series of iteration studies. Various combinations of brick and stone were explored as identified in the adjacent diagrams.</p> <p>Recessed staggered brick work was selected as the preferred design option, with the intention to reinforce the position of the entrance through its depth and colour.</p>
<p>The QRP felt that the muscularity of the architecture of the residential block was a positive feature, with the stepping back of the bay windows and balconies on the upper storeys making a further positive contribution. Given the distinctive function of the ground floor units, greater differentiation in the form of the plinth from the upper storeys could have been beneficial.</p>	<p>The applicant has explored different ways of articulating the base of the building. The applicant has included a continuous coping to the parapet of the plinth which creates a clear delineation between the ground and upper storeys.</p>
<p>The panel recognised that the boundary between the residential block and school represented a significant design challenge. While the proposals went a long way to resolving this, it felt this could have been explored further, with consideration given to the separation of Plot B and the school, to provide greater physical and visual connection to the River Rom.</p>	<p>A break in massing between the residential building and school now extends to ground floor, affording a visual connection to the River Rom through Plot B.</p>

School	
<p>The QRP was satisfied that a four-storey school could have been successful here, but encouraged early conversations with education providers to ensure that the proposed building would function effectively as a school. It suggested that part of this consultation be conducted with teachers and children as well.</p>	<p>Following the QRP feedback, a design review forum of Havering head teachers was convened by LBH for further review of the scheme design on 11th July 2019. The review included Havering primary school head teachers with recent experience of primary school building programmes.</p> <p>The design review sought to identify any areas of the school design requiring further consideration prior to the submission of the detailed planning application. The presentation included a series of option studies exploring alternate arrangements of nursery, SEND and hall spaces.</p>
<p>The QRP considered that there was little space to spare within the school layout, and this could have resulted in a hectic environment for pupils. It was therefore essential to create a refuge of tranquillity and calm, especially for younger children.</p>	<p>The idea of creating a 'small-school feel' is key in the design concept for the school, with each lower and upper key stage having their own teaching areas and direct access to play space.</p>
<p>It was considered by the QRP that further analysis of entrances to the school, with regard to how and where parents would drop off and collect children, should be undertaken to ensure that the school functioned as effectively at this interface as it did internally.</p>	<p>The design prioritises good connections with walking and cycling routes and provision of generous areas of public realm adjacent to school entrances. Following the QRP additional entrances have been added and a school drop-off / pick-up sequence has been time tabled and set out in detail in the submitted Design and Access Statement – Volume 4.</p>

- 6.4 Following previous Pre-App and QRP comments, the design team attended a series 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.

Summary of SPC Comments and Response from Applicant – 6 <sup>th</sup> October 2022	
SPC Comment	Applicant Response
The Committee sought clarifications over the future of the Islamic cultural centre on the site.	BCR LLP and HICC has agreed, in principle, to the off-site relocation of the facility to 222-226 South Street, which will either be acquired by agreement from the current landowner, or will subject to compulsory acquisition, as a final resort. BCR LLP has also agreed to pay HICC statutory compensation for relocation to this new site.
The Committee sought clarification over the future of the London Ambulance Station on the site.	The Hybrid Application (LPA Ref. P1765.23) submitted retains the existing LAS building onsite during the implementation of the detailed Phase 1 element of the scheme. The LAS is proposed to be demolished following the approval and implementation of the Reserved Matters for Phase 2. It has been identified that part of the northern access for the LAS is required in order to deliver the school within Phase 1. A practical solution to allow Phase 1 of the development to come forward whilst retaining the operational effectiveness of the LAS is being progressed.
The Committee queried how children will cross to the site and safely get across the ring road.	<p>The school is well located in the masterplan to provide pedestrian access for residents of Bridge Close and the wider local area.</p> <p>The proposed coordination with Havering Liveable Neighbourhoods team will achieve signalled crossings from the south and west of the scheme over the ring road. These crossings are in addition to existing pedestrian routes to the north and the proposed new bridge to the east.</p>
Queries were raised over the proposed quantum of affordable housing to be provided.	<p>The proposed development will provide a total of 35% affordable housing across the entire site on a habitable rooms basis with a tenure split comprising 70% intermediate and 30% affordable rent. This provision will be secured through a Section 106 Legal Agreement.</p> <p>Across Phase 1, the provision of 35% affordable housing equates to 374 affordable habitable rooms in total. Within Plot B, all of the units will be delivered as affordable housing. This will comprise 39 affordable rented units in the southern core of the Block at Levels 1-4 (118 hab rooms) and then 87 shared ownership units in the northern core of Levels 1-4 and across entire Levels – 5 –</p>

	8 (256 hab rooms). Plot A will comprise entirely private for sale housing.
The Committee commented that the proximity of bus routes and bus stops need to be considered in relation to the site. Consideration needs to be given to how people can get to and from the site.	<p>The majority of the site sits within zone PTAL 6a, which is considered high.</p> <p>The masterplan has been laid out to promote walking and cycling and to improve connectivity and public open space and play areas for the wider community. The bridge and the delivery of the East West connection significantly improves connectivity to Romford Station and local bus services.</p> <p>Bus services 5-103-174-175-365-498-499 provide access to Canning town, Rainham Interchange, Havering Park, Hillrise Park, Queen hospital, Brentwood and is 4-minute walk from/ of site. Romford station is located 800m north east from the site and can be accessed via Exchange Street.</p> <p>Bus services run along Waterloo Road and Oldchurch Road with bus stops on Oldchurch Road in front of Plot C and on Waterloo Road in front of The Brewery complex a 5 min walk from Plot E. All London buses (except one 'heritage' route, the 15H from Tower Hill to Trafalgar Square) are accessible buses that 'kneel' to minimise height differences between the bus floor and pavement, and have ramps and space inside for wheelchair and pushchair users.</p> <p>Since the public transport is not accessible for all, the development has made the following provision for alternative means of access to the site, which are described in the sections that follow:</p> <p>Suitable drop off points for taxis, community transport and private vehicles;</p> <p>On- and off-street parking for blue badge holders;</p> <p>Accessible cycle storage.</p>
Committee members noted that without a masterplan for the area, it is difficult to determine the	The applicant has worked with the LBH Masterplan Team to make sure that the proposed development at the site is co-ordinated with the overall approach for the Town Centre to ensure a jointed up approach.

impact of the proposals. It was also queried where the site sits within the emerging Romford Masterplan.	The Romford Masterplan was formally adopted on Wednesday, 12 <sup>th</sup> March, 2025.
The Committee noted that air quality monitoring was needed. Existing levels should be compared with construction levels. They considered that the air quality was very poor within the site currently. Some evidence of levels before, during and after construction are needed.	<p>An Air Quality Positive Statement has been prepared to assess the potential impacts on future residents of the development.</p> <p>The results of this assessment are detailed within the Environmental Statement submitted in support of the application.</p> <p>The submitted Air Quality Positive Statement describes the existing baseline air quality close to the Site, considers the suitability of the Site for the proposed development and assesses the impact of the construction and operation of the Development on local air quality.</p> <p>The main air pollutants of concern related to construction are dust and fine particulate matter</p> <p>The construction phase assessment has identified appropriate mitigation to employ against construction dust impacts. Construction phase effects are judged to be Not Significant when the identified mitigation measures are applied through a Demolition and Construction Environmental Management Plan for the Site.</p>

## 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 by the applicant 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.

## Environmental Impact Assessment (EIA)

- 6.6 The development falls within the thresholds set out in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), whereby an EIA is required for the purposes of assessing the likely significant environmental effects of the development. A Scoping Opinion was issued by the Council on the 3<sup>rd</sup> July 2021, commenting on the approach and methodology for assessing the impact of the following environmental topics:

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

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

## 7.0 CONSULTATION RESPONSE

### Statutory and Non Statutory Consultation

7.1 A summary of the consultation responses received along with the Officer comments where appropriate:

Active Travel England	No comment to make on the application Will not be commenting given TfL's role in promoting and supporting active travel through the planning process
Designing Out Crime Officer Met. Police	No objection Subject to comments being addressed and a Secured by Design planning condition being secured.
Greater London Authority	That Havering Council be advised that the application does not yet comply with the London Plan. Land Use Principles: The proposal for the comprehensive redevelopment of the site to deliver up to 1,070 new dwellings, commercial, health care centre, community uses and a new primary school (including nursery and 18 place SEN unit) within an Opportunity Area and Town Centre location is strongly supported. The phasing strategy is welcomed to encourage meanwhile uses and maintaining the operation of a community facility on site. Further consideration should be given to the existing

	<p>tenants and uses on site, to ensure they are not displaced (including HICC and ambulance station).</p> <p>Housing / Affordable Housing: The proposal delivers 35% affordable housing across the hybrid scheme. Within the detailed element, 126 affordable units (35% by habitable room), with a tenure split of 30% low-cost rent / 70% intermediate is proposed. The proportion of low-cost rent should be increased if viable, to better meet local and strategic need. A viability assessment is being robustly interrogated by GLA officers, with affordability, eligibility, early, mid and late-stage review mechanisms required.</p> <p>Urban Design / Heritage: The scheme provides a well-considered development layout, prioritising connectivity, public realm and landscaping, and does not raise strategic concern. Further activation of the River Rom/riverside walk is encouraged. The Design Code, with suggestions for play space and tall buildings should be updated and secured. In relation to tall buildings, the visual, functional and environmental impacts do not raise concerns at this stage, but will be fully considered at Stage II, in line with Part C of Policy D9. A fire strategy for the outline element should be provided. No harm is identified to nearby heritage assets.</p> <p>Transport: The proposal should remove general car parking, to be a car-free development. Furthermore, the development must be supported by improvements and design to encourage active and sustainable travel internally and connecting to the wider sites. The demand for public transport has been underestimated, and the mitigation package appears very limited, and should be extended to include, as a minimum, wider improvements to the local pedestrian and cycle infrastructure. Further information should be provided on access, road safety, parking, ATZ, trip generation, impact assessment, deliveries, and mitigation.</p> <p>Sustainable development and environmental matters: The energy strategy and overheating assessment must be updated in line with latest regulations. Further information required on circular economy, whole life-cycle carbon, sustainable drainage, flood risk and air quality. Mitigation to the SINC, UGF, biodiversity and greening should be secured.</p>
Historic England	<p>No comment to make on the application</p> <p>Suggest views are sought from the specialist conservation and archaeological advisors</p>
Historic England (GLAAS)	<p>No objection</p> <p>Recommends submission of a WSI to be secured by planning condition</p>

HSE - Gateway 1 (Fire Statement)	<p>Comments provided</p> <p>Content with the fire safety design of the full component of the application</p> <p>Insufficient fire safety information to assess the outline component</p>
LBH Education	<p>No objection</p> <p>Unity Schools Partnership were successful in securing a new school via Wave 14 of the free schools programme. This school is due to be delivered as part of the redevelopment of the Bridge Close site and will help meet the increase in demand for school places generated by the housing growth in Romford. However, the DfE hasn't yet made a decision on whether they are still funding the school. Therefore, a s106 contribution will still apply.</p> <p>Contribution sum for primary places - £1,594,626  Contribution sum for secondary places - £776,100  Total - £2,370,726</p>
LBH Env Health Air Quality	No objection subject to conditions.
LBH Environmental Health	No objection subject to conditions – land contamination and noise team.
LBH Highways	<p>No objection</p> <p>Public Transport Accessibility Level</p> <p>The site has a Public Transport Accessibility Level (PTAL) rating of 5 and 6b which translates to an average degree of access to surrounding public transport. This is an excellent area which suggests that all journeys could be conveniently made by public transport and therefore the development should be car-free.</p> <p>Servicing and Deliveries</p> <p>Swept Paths should be added where deliveries are going to take place, especially at locations where vehicles are likely to turn.</p> <p>Any Underground Refuse System (URS) to be used for this development be placed at locations that will not cause obstructions to the public, either vehicles or pedestrians especially during operations purposes.</p> <p>Highway Works</p> <p>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.</p> <p>Demolition and Construction Matters</p> <p>Construction Logistic Plan (CLP) was added to the Transport Assessment (TA). A CLP is a standalone document. The current CLP produced states '<i>It has been produced taking into account TfL CLP guidance (July 2019)</i>' It should actually follow the Construction Logistics</p>

	<p>and Community Safety (CLOCS) guidance. As such there were some items missing from the CLP.</p> <p><b>Pedestrians Accessibility</b> It is noted that there is an existing bridge from the proposed site into Regarth Avenue.</p> <p>Highways welcome the proposals of the new bridge over the River Rom for pedestrians and cyclists use. This gives access to Romford station and contributes to enhancement of the public realm for both existing and future residents.</p> <p>The addition of crossing point on Waterloo Road and Old Church Road are welcomed.</p> <p><b>Road Safety Audit</b> Has a stage 1 Road Safety Audit been carried out? These are undertaken at the completion of preliminary design. Has any collision data been collected to design this development?</p> <p><b>Access, Servicing and Inclusive design</b> Off-highway servicing proposed, no swept path information provided. Please provide, especially at the accesses to the site.</p> <p>The construction of this development is likely to have impacts on the highway network and bus operations, therefore a Delivery and Servicing Management Plan should be provided well in advance of any formal application in order to adequately demonstrate how the proposals would make adequate and satisfactory provision for the servicing of the site.</p>
LBH Waste & Recycling	<p>No objection</p> <p>Require sufficient number of refuse and recycling bins</p> <p>Guidance provided on refuse and recycling bins at the site, suitable storage areas and collection arrangements.</p>
Lead Local Flood Authority	No objection
London Ambulance Service	<p>Objection</p> <p>The loss of the ambulance station is contrary to policy and has not been assessed in the planning application</p> <p>The loss would have a detrimental impact on patient healthcare and the LAS being able to deliver on the statutory duty across the Boroughs of Havering and Barking and Dagenham</p>
London Fire Brigade (fire safety)	No objection
LFEPA - Water Office	<p>No objection</p> <p>No additional fire hydrants are required and no further action required by the applicant.</p>
Natural England	No objection
Network Rail	Comments provided

	<p>Recommends to enter a Network Rail Basic Asset Protection Agreement (BAPA)</p> <p>Sets out general criteria for works near Network Rail land</p>
NHS	A contribution is necessary
Place Services - Built Heritage and Historic Environment	<p>Comments provided</p> <p>The overall impact of the proposed development upon the significance of the relevant non-designated heritage assets would be indirect but harmful, therefore Paragraph 209 of the NPPF (December 2023) is relevant.</p>
Place Services - Landscape	<p>No objection</p> <p>Further information required on loss of trees</p> <p>Recommend conditions to secure a landscaping scheme and landscape management plan</p> <p>Wait to coordinate with trees / ecology comments</p>
Place Services - Trees	<p>No objection in principle</p> <p>Further information required on a sufficient replacement strategy to offset loss of trees</p> <p>Conditions recommended for protection of retained trees</p>
Sport England	<p>Comments provided</p> <p>The residential population generated by up to 1,070 dwellings based on a typical occupancy ratio of 2.4 persons per dwelling is estimated approximately up to 2,568 people. This additional residential population will generate additional demand for sports facilities. If this demand is not adequately met then it will place additional pressure on existing sports facilities, thereby creating or exacerbating deficiencies in existing provision.</p> <p>Although there is floorspace proposed falling within Use Classes E it is not clear whether any of these would actually be sport facilities and, if there were to be sport facilities, then it is not clear what sport facilities would be provided. As a result, it is unknown if there are any sport facilities proposed that would meet the sporting demands arising from the development.</p> <p>The adopted planning policy context for justifying the principle of sports facility provision is provided by Policy 18 (Open space, sports and recreation) of the Local Plan which confirms where sufficient provision cannot be made on-site the Council will seek developer contributions to remedy deficiencies in quantity, quality, safety, usability and access to open space, sports and recreation facilities across the Borough.</p> <p>It is not clear how, or if, the Local Planning Authority intends to mitigate the impact of the increase of sporting demand on local sport facilities.</p> <p>If provision for sports facilities is to be made by the CIL charge, it is acknowledged that there is no requirement to identify where those CIL funds will be directed as part of</p>



	<p>the determination of any application. That said, Sport England would encourage the Local Planning Authority to consider the sporting needs arising from the development.</p> <p>Sport England's Sports Facility Calculator can help to provide an indication of the likely demand that will be generated by a development for sport facilities. The population for the detailed proposal would be approximately 2,568 which would generate a demand of 0.08 artificial grass pitches (£94,522 if 3G, £85,402 if sand), 0.04 of indoor bowls (£17,507), 0.74 sport hall courts and 0.19 sport halls (£573,972), and 0.13 pools, 0.53 lanes and 28.14sqm of swimming pools (£624,082). would request that any planning permission makes provision for securing the community use of the sports facilities provided on the school site.</p> <p>A formal community use agreement would be the appropriate mechanism for securing community use. Sport England would request a planning condition to be imposed requiring details to be submitted and approved which demonstrate how promoting physical activity has been considered in the design and layout of the development</p>
Thames Water Dev. Control Environment Agency	<p>Recommend conditions</p> <p>Comments received from the EA 18/8/25 confirming that the submitted modelling information is now considered fit for purpose and the outstanding issues raised have been satisfactorily addressed with the design expect to have a 26% central climate allowance. The EA notes that a number of green comments remain where improvements could still be made for the existing study and any future studies which may use this data, however it is unlikely that these changes would impact the outcomes of this study.</p> <p>The EA have however sought an updated flood risk assessment and model report prior to decision.</p> <p>Additional information sought from applicant 19/8/2025</p>
Transport for London	<p>TfL acknowledges improvements in access and layout, including the submission of a Stage 1 Road Safety Audit and design updates to the new foot-cycle bridge and Old Church Road access. However, TfL raises concerns about pedestrian and cyclist safety near bus operations, the need for consistent design dimensions, and the importance of aligning with the Romford Masterplan SPD. TfL also expresses disappointment over the decision not</p>

to retain the existing footbridge to Regarth Avenue and urges reconsideration. Internal layout issues, such as the staggered pedestrian/cycle route and River Rom Walkway access, require further refinement.

TfL welcomes the removal of general car parking in later phases but strongly opposes its inclusion in Phase 1 due to safety and policy concerns. Disabled parking provision is deemed acceptable, though some design tweaks are needed. Cycle parking details must be conditioned, and internal cycle routes should be reconsidered to avoid conflicts with vehicles. TfL supports the shift to on-site deliveries and the removal of the Old Church Road loading bay. However, it recommends relocating one loading bay and conditioning the Delivery and Servicing Plan to include management and monitoring details.

TfL finds the revised travel demand modelling acceptable, despite minor disagreements on bus usage assumptions. The updated trip generation figures are significantly higher, but TfL concludes that existing bus services can accommodate the demand. For rail, TfL requests a revised gateline assessment and a £150,000 contribution toward a feasibility study for step-free access at Romford station. TfL also supports a potential second station entrance and urges financial contributions toward it or other sustainable transport improvements.

TfL has reservations about the modelling and design of the relocated Waterloo Road crossing. While accepting that details can be conditioned, TfL insists on securing signal upgrades through a Section 106 agreement to minimize adverse impacts. The revised Framework Travel Plan is generally acceptable but lacks focus on Phase 1, where car use reduction is most critical. TfL calls for a site-wide Travel Plan and individual plans for each phase, secured and monitored via the Section 106 agreement.

TfL finds the revised Construction Logistics Plan (CLP) insufficient, lacking detail on safety, access, and impacts. A detailed CLP must be conditioned and aligned with TfL guidance. TfL also requests clarity on operational requirements for the community and ambulance centres during construction.

Outstanding concerns remain regarding access, layout, off-site crossings, and Romford station impacts. TfL expects a comprehensive mitigation package, including contributions and works toward active travel

	improvements, and conditions covering parking, servicing, travel planning, construction logistics, and crossing design.
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## LOCAL REPRESENTATION

7.2 The application was advertised via a Press Notice and Site Notice displayed at the site for 30 days. Notification letters were sent to neighbouring properties regarding this application.

7.3 2690 neighbour representations (58 support and 2524 objection) have been received via the Council's publicity process.

### Representations

7.4 Havering Islamic and Cultural Centre have raised the following objections:

- **Loss of Existing Facility:** The proposed redevelopment will result in the demolition and complete loss of the Havering Islamic Cultural Centre (HICC) without confirmed plans for reprovion.
- **Community Impact:** The HICC is a vital religious, cultural, and community facility. The loss of this facility without a detailed and workable mechanism for reprovion is contrary to planning policy, human rights, and equality duties.
- **Insufficient Reprovion Plans:** The applicant's revised plans do not provide realistic, viable, or achievable options for the reprovion of HICC. The potential temporary solutions mentioned are not confirmed and lack confidence.
- **Phasing Issues:** The current phasing plan would cause a loss of social infrastructure and an interruption to the function of the HICC, which is contrary to planning policies.
- **Fire Safety Concerns:** The Phase 1 works would remove the only means of escape from a nearby building, rendering it non-compliant from a fire safety perspective.
- **Inadequate Temporary Solutions:** The proposed temporary solutions for HICC within the development are not realistic due to limitations in location, scale, height, and mass.
- **Off-Site Relocation Uncertainty:** The potential off-site relocation is not certain as it is still in early planning stages with many unresolved issues.
- **Legal and Policy Compliance:** The application fails to comply with planning policies, human rights, and equality duties. The lack of confirmed reprovion plans makes the application fundamentally flawed.
- **Meaningful Engagement:** The applicant has not engaged meaningfully with HICC to address its specific needs and requirements. The design of the scheme has not been amended to reflect HICC's comments.

- Technical Documentation Deficiencies: The Transport Assessment, Acoustic Assessment, Equalities Impact Assessment, and Health Impact Assessment are deficient and need reconsideration

7.5 Romford Civic Society object to height of block C1, link to Rover Rom should be indented, impact on Page Calnan Building and lack of biodiversity coordination.

7.6 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:

#### Principle

- The Waterloo Estate is undergoing construction and a further 383 properties is not desirable as Romford will be over populated
- Homelessness and anti-social behaviour issues needs to be reduced before building new homes
- The proposal would bring much needed housing for the area
- Romford is already dominated by flats, the Oldchurch Hospital site, renovation of the Waterloo Estate and all roads just lined by blocks of flats
- Raises a question if more parks and open spaces would help instead of new building.
- Concern the proposal would not achieve the 15 minute city
- Lack of compliance with the NPPF give proposed design, character, loss of community religious space
- Much needed development to introduce more homes to the area and a school for the future of the borough. This will help revitalise the surrounding areas that have been let down by derelict buildings
- Good addition to Romford. We need more high quality homes to attract young professionals to the area
- The land currently is rather neglected and is not being used in the way that would improve the lives of residents in Romford. The London Borough of Havering has a huge issue with supply and demand when it comes to housing. The housing development on land at Bridge Close would help ease the housing crisis that is currently happening in the borough of Havering.

#### Social Infrastructure

- Proposal would remove key services to the Havering Community provided by HICC, both as a place of sanctuary and worship for Muslims and its wider community support (fundraising events for local charities, the food bank and soup kitchen, careers events)

- The mosque is very important to maintain religious beliefs and very vital institutions for our future generation.
- Proposal would see the loss of the Havering Islamic Cultural Centre at 91 Waterloo Road, this is a long established and largest mosque in Havering which also provides many community facilities such as after school classes, Soup Kitchen, Food Bank and Fundraising events for many charities
- The Havering Islamic Community Centre is home to over 2,500 worshippers, with a gathering of over 7,000 on special occasions such as Eid. The current plans will see this religiously significant site removed completely, with no plans to rehouse it within a reasonable vicinity for the worshippers
- Vehemently object to the plans until an appropriate alternative site is provided. The alternative site must be sufficiently large and sufficiently close for the thousands of worshippers who will otherwise have nowhere left to pray, and for the members of the local community who will lose access to these vital services
- Disappointed with Havering for not securing a place for HICC before going for planning, the Muslim community need assurances and security, this also makes our users of the Soup kitchen and Food bank very anxious
- HICC is the only mosque in Romford and there has been no plans or views for the councils to offer to relocate the mosque in the borough within reasonable distance with good transport connection
- Demolition would violate protections under the Human Rights Act 1998 and Equality Act 2010, which safeguard freedom of religious expression and protection from religious discrimination.
- The centre is part of Havering's cultural identity and may be protected under heritage preservation laws.
- Demolition of the HICC would affect cohesion and Inclusion as the centre promotes inter-faith dialogue and unity among diverse community groups.
- Demolition of the HICC would affect mental health support as the centre serves as a place of emotional and psychological support for many.
- The current proposal fails to adequately acknowledge the cultural and community significance of the Islamic centre.
- Suggest integrating the centre into new development plans to reflect Havering's multicultural values.
- Proposes a partnership model to enhance community services and align redevelopment with social needs.
- The proposed compulsory purchase order appears to be an unjust measure, as it deprives the community of a vital institution without providing an equivalent alternative. This action raises ethical and moral concerns about the fairness of the decision
- The plan should include detailed provisions on how access to the current place of worship will be maintained throughout the implementation of the proposed changes.

Any disruption to our ability to practice our faith should be minimised, and alternative arrangements should be clearly communicated

- The proposed space that has been allocated to us is not clear, if even existent. The space should be big enough for the current community which use the site on a daily basis. As well as have enough space to support the incoming Muslims which have been moving towards the area.
- It will be useful to consider impact on minority ethnic groups particularly religious communities. What are proposed plans of retaining the Havering Islamic Cultural Centre in its current location? Are suitable alternative locations considered
- The mosque's critical role as a place of worship for the Muslim community. The importance of having a dedicated space for religious practices and community gatherings, which contributes to the spiritual well-being of residents.
- Loss of the mosque's role assists in fostering cultural understanding and diversity within the community. A mosque serves not only as a religious centre but also as a symbol of cultural richness and pluralism, contributing to the overall harmony of the neighbourhood.
- Loss of community services or outreach programs run by the mosque. Many mosques provide social services, educational programs, and charitable activities. Losing such a community-oriented institution would negatively affect the well-being of residents who rely on these services.
- Losing the mosque might disrupt the cohesion and shared identity within the community, impacting social bonds and collective well-being.
- Do not agree with the planning update and there being no new site agreed for the Islamic cultural centre.

#### Health and education

- Queens Hospital is already strained and although this application says it will have a medical centre that isn't helping the bed situation in queens when needed as again the result of overbuilding in Romford
- Will the existing residents be provided with more schools/high schools and children centres? Will existing residence be provided with more medical centres that aren't fully booked? Will more Hospitals/ walk in centres be built?
- We need another hospital. Not more flats
- Not enough parking and the hospital cannot cope with the volume already
- Waiting times in Queens Hospital A&E need to reduce before new homes are introduced in the area

## Highways

- Havering is already congested with the back log of traffic effects as far out as Upminster, further development would increase congestion
- Romford has already had other developments built which has made it so congested

## Retail

- Will the shops that are already empty actually be filled before more retail is built?
- No shops required when development is so close to Romford town centre shops. If shops were to be available they would probably be open late and attract antisocial behaviour.
- No need for commercial space, make this residential block easy access to town centre, rather creating another satellite high street. Make sure good number of allocated parking space and proper relocation of mosque

## Safety and security

- Romford needs to create a safe space for its current residents before further developments to the area are to be made! Focus should be directed to Policing, to tackle anti-social & criminal activity within the town centre, and asking more people to come and live here will just add to the ever-increasing issues.

## Process

- Adequate and meaningful consultation with the affected community appears to be lacking in this process
- imperative that the Bridge Council development's planning permission application be deferred until a specific site for Havering Islamic Centre is determined through a transparent and consultative process

## 8.0 RELEVANT POLICIES

8.1 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 6 - Building a strong, competitive economy

Chapter 8 - Promoting healthy and safe communities

Chapter 9 - Promoting sustainable transport

Chapter 11 - Making effective use of land

Chapter 12 - Achieving well-designed places

Chapter 14 - Meeting the challenge of climate change, flooding and coastal change

Chapter 15 - Conserving and enhancing the natural environment

Chapter 16 - Conserving and enhancing the historic environment

## London Plan 2021

SD1 Opportunity Areas

SD6 Town centres and high streets

SD7 Town centres: development principles and Development Plan

SD10 Strategic and local regeneration

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

D9 Tall buildings

D11 Safety, security and resilience to emergency

D12 Fire safety

D13 Agent of Change



D14 Noise

H1 Increasing housing supply

H4 Delivering affordable housing

H5 Threshold approach to applications

H15 Purpose-built student accommodation

S4 Play and recreation facilities

E2 Providing suitable business space

E3 Affordable workspace

E4 Land for industry, logistics and services to support London's economic function

E9 Retail, markets and hot food takeaways

E11 Skills and opportunities for all

HC1 Heritage conservation and growth

HC5 Supporting London's culture and creative industries

HC6 Supporting the night-time economy

G1 Green infrastructure

G4 Local green and open space

G5 Urban greening

G6 Biodiversity and access to nature

G7 Trees and woodlands

SI 1 Improving air quality

SI 2 Minimising greenhouse gas emissions

SI 3 Energy infrastructure

SI 4 Managing heat risk

SI 5 Water infrastructure

SI 6 Digital connectivity infrastructure

SI 7 Reducing waste and supporting the circular economy

SI 8 Waste capacity and net waste self-sufficiency

SI 12 Flood risk management

SI 13 Sustainable drainage

SI 16 Waterways – use and enjoyment

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

T6.1 Residential parking

T6.2 Office parking

T6.3 Retail parking

T6.5 Non-residential disabled persons parking

T7 Deliveries, servicing and construction

T9 Funding transport infrastructure through planning

DF1 Delivery of the Plan and Planning Obligations

M1 Monitoring

#### Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017)

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

Viability Tested Route: 'Schemes which do not meet the 35 per cent affordable housing threshold, or require public subsidy to do so, will be required to submit detailed viability information (in the form set out in Part three) which will be scrutinised by the Local Planning Authority (LPA), and where relevant the Mayor, and treated transparently. Where a LPA or the Mayor determines that a greater level of affordable housing could viably be supported, a higher level of affordable housing will be required which may exceed the 35 per cent threshold. In addition, early and late viability reviews will be applied to all schemes that do

not meet the threshold in order to ensure that affordable housing contributions are increased if viability improves over time'.

#### Play and Informal Recreation SPG (2012)

The calculator accompanying this SPG should be used to estimate the child yield associated with the scheme and the amount of any play space subsequently required as a part of the proposal.

#### Sustainable Design and Construction (2014)

This SPG contains advice on natural resource management, climate change adaptation and pollution management. It reinforces similar policies contained within national and local planning policy.

#### Character and Context SPG (2014)

This document sets out the principles of site responsive design that should inform the Design and Access Statement to be submitted with the application, helping to promote the right development in the right place.

#### Housing Design Standards LPG (2023)

The Housing Design Standards guidance provides a set of standards and checklist of London Plan policy requirements for housing grouped under 3 broad headings which reflect the scale they operate at:

Placemaking and the public realm – the area around the site

Shared spaces and ancillary spaces – communal spaces within the site

Homes and private outside space – private homes and spaces within the site.

#### Accessible London SPG

This and the document Design and Access Statements: How to write, read and use them (Design Council, 2006) guidance from Design Council CABE will also help to inform preparation of the Design and Access Statement needed to accompany the application.

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

#### 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
- 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

Site Specific Allocations in the Romford Area Action Plan 2008

ROMSSA2 – Bridge Close

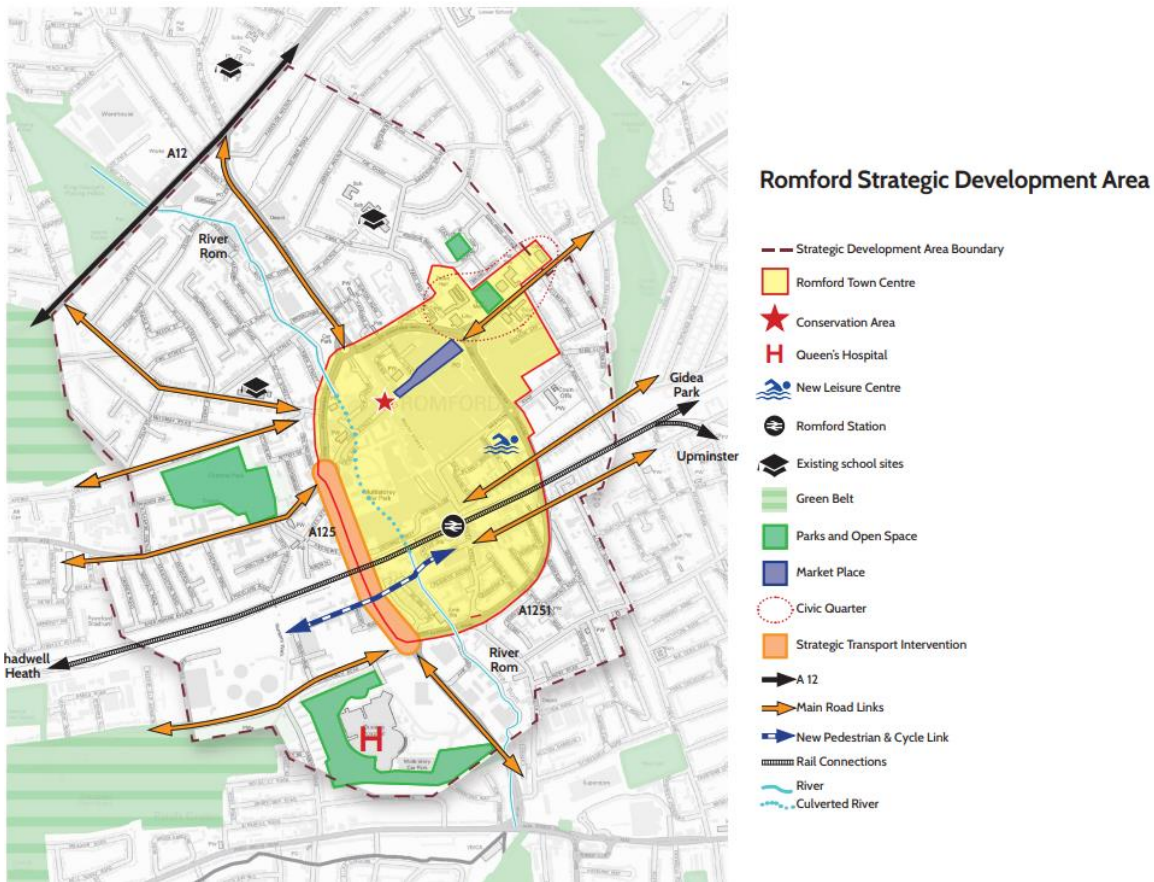
## **9.0 MATERIAL PLANNING CONSIDERATIONS**

9.1 The main planning considerations for the application proposals are set out below and considered in turn with this report:

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

### **Principle of Development**

9.2 The Site is located within Policy 1 'Romford Strategic Development Area' of the Local Plan and is identified as being located within Romford Town Centre with a new pedestrian/cycle link running through the Site and a Strategic Transport Interventions running along the south-western edge. Policy 1 also includes providing a pedestrian/cycle link alongside the River Rom and requires consideration for being located in Flood Zone 2/3b.



- 9.3 The site is between the railway connection to the north, a strategic transport intervention to the west (Waterloo Road), River Rom to the East and the edge of the development area to the south (Oldchurch Road).
- 9.4 The Site is within ROMSSA2 'Bridge Close' (Figure 6) of the Romford Area Action Plan (RAAP). Proposals must include A3 use (cafes and restaurants) on the River Rom frontage, new public spaces, enhanced amenity, recreational and ecological value of the River Rom, pedestrian riverside route, cycle links, sensitive design to existing housing. Furthermore, the allocation specifies that residential development should achieve a density between 240-435 units per hectare, the importance of being sensitive to the privacy and amenity of existing housing along Waterloo Road and Oldchurch Road and support for existing businesses in finding alternative locations is a priority.



- 9.5 The proposed redevelopment of the site comprises the demolition of existing housing, non-residential buildings, Havering Islamic Cultural Centre and the Romford Ambulance Station. This section will consider these in turn before moving to the principle of the proposed development.

#### Loss of existing homes

- 9.6 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.
- 9.7 The existing housing is outside of the Bridge Close allocation and within the red line comprising 37 mainly terraced housing facing Waterloo Road and Oldchurch Road. The proposal provides residential development at a density of 291 dwellings per hectare, which would represent an uplift in density and sits comfortably within the range identified in the site-specific allocation. The proposal will provide a mix of 36 3 and 4 bedroom dwellings as therefore there would be no net loss of family sized units.
- 9.8 It is considered the loss of the existing housing is acceptable due to the significantly greater on-site provision and density proposed.

#### Loss of non-residential buildings (commercial/industrial)

- 9.9 London Plan Policy E4 advocates that sufficient supply of land and premises should be available to meet current and future demands for industrial uses and related functions. An emphasis is placed on locations that are well connected by public transport, walking and cycling which contribute to other planning priorities including housing, schools and other infrastructure.

- 9.10 The supporting text to ROMSSA2 states that following the Havering Employment Land Review approximately 15–20% of general industrial use buildings (B2 use class) at Bridge Close was unoccupied, indicating low demand for these premises at this location. This was supported by the limited take up of general industrial use buildings in Romford. The review also noted that the site is constrained on all four sides and that businesses would find it difficult to expand at Bridge Close and recommended that the estate should be de-designated as employment land and re-allocated for mixed use development.
- 9.11 There is circa 13,700 sqm (GEA) in Class E. g) / B2 / B8 uses. Some of the units on site are vacant, and at this stage the site generates approximately 483 employees. The proposed commercial floorspace for the development is up to 5,956 square metres, classified under Class E use. This flexible space is designed to accommodate a variety of tenants (new and existing), including micro-businesses, start-ups, and SMEs, and to respond to changing market needs.
- 9.12 The removal of non-residential uses is considered acceptable by reason of the plan making process and allocation of ROMSSA2 which acknowledged the loss as an enabling factor in bringing forward the mixed use regeneration scheme. In line with the recommendations of the Havering Employment Land Review, the Council is retaining the secondary employment sites on Crow Lane, Seedbed and at Lyon Road to ensure that there is sufficient opportunity for businesses to maintain their presence in Romford.
- 9.13 The application has been supported by a commercial strategy, which provides the mechanism for occupation for a range of new commercial premises within the scheme, including possible replacement premises for some of the existing businesses. The plan includes engaging with all existing occupiers through a process led by property consultants, who are responsible for determining their relocation requirements based on factors such as building size, location, permitted use, and tenancy type. They are also involved in negotiations to acquire land and properties, with over 80% of residential units and approximately 57% of non-residential freeholds already acquired or in the process of being acquired. This proactive engagement aims to facilitate suitable alternative arrangements for existing businesses, ensuring their relocation aligns with overall redevelopment objectives and minimises disruption.
- 9.14 A planning condition will require submission of a detailed commercial strategy to enable the mitigating measures for existing tenants and future tenants in the phased development to be fully considered in detail to satisfy Policy London Plan Policy E4, Local Plan Policy 20 and ROMSSA2.



### Loss of community infrastructure (HICC and RAS)

- 9.15 Policy S1 of the London Plan (2021) sets out a strategic requirement to protect existing social infrastructure, recognising its essential role in supporting the health, wellbeing, education, and cohesion of London's communities. The HICC and the LAS fall under S1 and given a health service does not operate without ambulances and it must be considered as a health-related use, which would fall under Policy S1. Under the terms of Policy S1 (Part F), existing social infrastructure should only be redeveloped or lost where:
- A replacement facility of equivalent or improved standard is provided in a location that is accessible to the community it serves;
  - The proposal forms part of a public service transformation strategy that rationalises and modernises service delivery without resulting in a loss of provision or accessibility.
- 9.16 Where a facility is deemed surplus to requirement, the policy requires that alternative forms of social or community use are considered and ruled out before any permanent change of use or redevelopment for non-social infrastructure is supported. This policy ensures that community needs continue to be met, particularly in areas of growth, regeneration, or identified social need.
- 9.17 Local Plan Policy 16 advocates where it would result in a loss of social infrastructure in areas of defined need (for the type of social infrastructure lost) unless there are realistic proposals for re-provision development will not be permitted. Re-provision in this context is outlined in the sub-text to Policy 16 of the Havering Local Plan at paragraph 8.5.7 "that equivalent replacement provision (in terms of size, usefulness, attractiveness, safety and quality) has been made."
- 9.18 The existing Havering Islamic Cultural Centre (HICC) and Romford Ambulance Station, are included within the site's overall redevelopment plan, where the existing buildings are due to demolished.

### *Havering Islamic Community Centre*

- 9.19 The Havering Islamic Cultural Centre (HICC) currently operates from two locations within the Bridge Close area: 91 Waterloo Road, where it holds a conditional permission, and 9 Bridge Close, which had temporary permission that expired on 1 April 2025. Since no application was submitted to extend or make this use permanent, the lawful use of 9 Bridge Close has reverted to its original business use classification. As a result, only 91 Waterloo Road remains lawfully permitted for religious use, and all other faith-based permissions on the site have lapsed.

- 9.20 Officers consider it important, in considering whether the provision of Policy S1 are met, to assess what the current position is with regard to the HICC site at 91 Waterloo Road:
- Floorspace – Currently the building provides 446 square metres of floorspace over 2 storeys with an additional 276 square metres provided by an external canopy.
  - Site Area/Function - The site has an area of 1395 square metres which includes the above buildings and hardstanding providing car parking and access. The site adjoins residential to the south and the wider Bridge Close to the east. There is limited space for gathering and it is apparent that during busy periods, there is obstruction of the footway and increased vehicle movements requiring parking management and stewardship. Further information is required in respect of a suitable evacuation point.
  - Planning restrictions - A condition attached to 91 Waterloo Road currently allows early and late use of the premises until 31 January 2027, but requires hours to be limited to 7am to 9.30pm from 2028 – this condition is considered necessary due to the need to protect existing/future residential amenity given the relationship to adjoining sites.
- 9.21 It is acknowledged that the current site provides an important community facility, but the potential of expansion of that use is limited by the current constraints. Redeveloping the HICC site in isolation may be possible, but the current site size and relationship with neighbours would similarly limit the scope of any proposal. It therefore would be appropriate to consider a comparison of the current provision with the redevelopment of the wider site and the opportunity that provides.
- 9.22 The hybrid application includes 2,768 sqm of flexible space, with 1,001 sqm specifically allocated for a community centre within Block D1, although as this is in the outline part of the scheme, this could be set as a minimum requirement. The location of D1 and the parameters also includes more generous circulation and gathering space around the building compared to existing.
- 9.23 Despite these on-site provisions, HICC has expressed concerns that the proposed facilities may not adequately meet their current and future needs. Their congregation can reach 1,000 worshippers for Friday prayers (staggered) and up to 5,000 (staggered) during major religious festivals such as Eid and Ramadan. They argue that the proposed 1,001 sqm may not be sufficient to accommodate their full range of religious, cultural, and community activities. Additionally, they are concerned about the lack of detail in the outline application, particularly regarding the design, layout, external amenity space, and parking—especially for disabled users.
- 9.24 HICC also questions whether the proposed facilities truly reflect the way their current space is used, particularly during peak periods in the religious calendar. They feel

that the application does not explicitly confirm re-provision tailored to their specific operational and cultural requirements. While the Development Framework encourages collaboration with faith groups to ensure appropriate re-provision, HICC believes the current plans fall short of this objective. HICC seeks assurances that their religious and community functions will be preserved. It is unclear exactly why the proposed community space would not fully meet the purposes of the HICC, the proposed floor space would be significantly larger than the current floor space that the HICC operates from. With appropriately worded conditions or planning obligations, it is considered that should an alternative site not be made available that a design and layout of the proposed community space can be satisfactorily achieved through conditions to meet the needs / requirements of the HICC. In addition, officers are of the view that a community use / place of worship can be successfully accommodated within a mixed use development as is being proposed at Bridge Close.

- 9.25 The HICC has since confirmed that off-site relocation is being considered. An alternative site has been identified and is at the early stages in the pre-application process. The applicant has agreed to help facilitate the off-site provision, should planning permission be forthcoming.
- 9.26 It is therefore concluded that the on-site provision for HICC is compliant with Policy 16. The policy requirement is for re-provision as described in the sub-text to Policy 16 of the Havering Local Plan at paragraph 8.5.7. The existing building is not purpose built for religious worship. It is a converted light industrial unit without step free access to the first floor. The re-provision proposed is both an improvement in the quantity and quality of floorspace. It would also provide step free access in compliance with the Equality Act 2010. It would be necessary to ensure that the current use of 91 Waterloo Road is retained until such time as alternate provision is secured and operational (although allowing for any interim facilities) either on the Bridge Close site or off-site. It is recommended that this be secured through both planning condition and S106 legal agreement.

#### *Other Religious Uses*

- 9.27 The objection letter refers to the loss of other religious uses within the site however, it is noted that these are either unauthorised or subject to temporary planning permission and therefore limited weight has been afforded to the loss.

#### *Romford Ambulance Station*

- 9.28 The planning application does not propose a direct re-provision of the LAS building within the site for the storing and maintenance of ambulances. The existing LAS building during the implementation of the detailed Phase 1 will be retained (with the

exception of a northern access) where it will be demolished following the approval and implementation of the Reserved Matters for Phase 2.

- 9.29 It is noted the difficulties in providing an ambulance station within the current proposal. It is understood that a Letter of Commitment has been prepared and sent to the LAS which illustrates that the applicant is committed to finding a relocation option for the LAS. As such, it is considered appropriate that a condition is imposed and S106 legal agreement entered into to ensure that this part of Phase II should not commence until alternative provision for ambulance facilities has become operational or confirmed by LAS that continued use is no longer required. A further condition tied to Phase I would allow negotiations to finish regarding resolving the northern access in order the ambulance can still operate while Phase 1 is brought forward for development.

#### Proposed residential

- 9.30 There are no in principle objections to a residential-led mixed use development coming forward on this site. The proposal would contribute towards delivering high quality homes in the Romford Strategic Development Area in a highly sustainable location at a density which sits comfortably within the range identified in the site-specific allocation.

#### Connectivity with the wider area

- 9.31 The full component includes the construction of a new footbridge over the River Rom and a new crossing on Waterloo Road with an intervening shared cycle/pedestrian path to connect with Union Road. Also within Phase I a route would be created adjacent to the River Rom leading south to connect with Oldchurch Road. Full details have been submitted showing construction and appearance, which will be considered later in this report.
- 9.32 In terms of the principle the footbridge, intervening pathway, Waterloo Road crossing and River Rom walkway would cumulatively enhance the connectivity with existing areas in all directions. The routes would result in a continuous, safe and accessible links for pedestrians and cyclists that would benefit new and existing residents alike.
- 9.33 The footbridge would provide direct access from the site to the train station and town centre. In conjunction with the Waterloo Road crossing would open up the area to the west for direct access to the town centre i.e. route creation between Union Road and Atlanta Boulevard.
- 9.34 The route adjacent to the Rom would provide connection opportunities for southern areas of the site and the land to the south beyond Oldchurch Road e.g. development

proposals at the Seedbed Centre/ Rom Valley Way Retail Park and the Ice Rink to be connected to the town centre.

- 9.35 As such it is considered the enabling works within this application would result in an enhancement of connectivity in the area through the site from the surrounding areas beyond the application site which would broadly align with ROMSSA2 and the connectivity section of Local Plan Policy 1.

#### Proposed school and nursery

- 9.36 Local Plan Policy 1 supports growth in the Romford Strategic Development Area and requires primary school provision equivalent to three forms of entry (FE) in the first 5 years of the Plan and a further 6FE need for primary school places beyond the first five years. The policy reports that a 3 form entry primary school (630 places) has been approved for the Bridge Close development site and the new school should be sufficient to meet demand for additional primary places needed over the next five years.
- 9.37 The application under Phase I proposes a new school and nursery. The school and nursery is situated along the southern and eastern boundaries of Plot B. A playground is located to the front of the building with the wings of the building rising to 4 storey in height whilst the angled section of the building in the southeast corner rises to 1 storey in height. An additional area of outdoor play is proposed on top of this section. The roads outside of the school will adopt a school's street approach where CCTV cameras will be in place to monitor vehicles stopping outside of the school to drop and collect children at peak times in the morning and afternoon. The school will be operated by Unity School Partnerships.
- 9.38 The proposed school will be considered in more detail later in this report. However, in terms of the principle the school and nursery aligns with Policy 1 and as such is acceptable land use.

#### Proposed Health and Community spaces

- 9.39 The Outline Component comprises up to 2,768 c (GEA) of community floorspace, comprising a flexible health centre / commercial unit (Class E / F1 / F2) and community centre, located across the scheme to be delivered in the future phases of the development. The illustrative scheme includes 1,001 sqm dedicated solely for the community centre, however, a greater proportion could be allocated for community space if required. The current lawful HICC floorspace area is 446 sqm.
- 9.40 The intention is for the development to be phased, which will allow the existing community use to be operational during the early part of the construction works. Plot

C1 and C2 will come forward during Phase 2 and Plot D1, D2 and E to come forward at Phase 3.

- 9.41 The health centre is designed to be adaptable. Should the NHS require the onsite facility, it would be occupied accordingly. If it is determined that the NHS does not need an additional onsite facility, the unit will be converted for commercial use. The proposed health centre could provide floorspace which would align with Local Plan Policy 1 in delivering a new health hub to support the growth within the RSDA. "First refusal" will be available to the NHS in regard to the space through the proposed S106 legal agreement. Should this not be forthcoming given the site is located within the town centre with excellent links to transportation (given the enabling footbridge connection) this could be used as flexible commercial floorspace.
- 9.42 Notwithstanding occupation by the HICC and in respect of the community centre, the use of the space(s) would fall broadly in line with Policy 16 where it is preferred that town centres and the borough's Strategic Development Areas are locations for new social infrastructure. The proposed community use would be accessible by public transport and active travel, located within which they would serve and provide the opportunity to be utilised, to co-locate with complimentary services.
- 9.43 It is considered the proposed health and community uses are in principle acceptable.

#### Commercial spaces

- 9.44 Local Plan Policy 1 sets out a criteria for consideration of new commercial uses within the town centre. ROMSSA2 advocates some commercial uses (mainly falling under café/restaurant use class A3 – now superseded) to be at ground level and along the River Rom. Pertinent to this space is Local Plan Policy 13 which amongst other factors seeks to enhance the vitality and vibrancy of Havering's town centres, maintaining their important role for local communities.
- 9.45 Planning permission is sought for up to 5,956 sqm of flexible commercial floorspace across the site (Class E use). Although Class E can include retail, potential occupiers could include micro-businesses, start-ups and smaller Small to Medium Enterprises (SMEs).
- 9.46 The re-use of the land for light industrial/maker space will make a positive contribution to the town centre and repurpose space within the existing industrial site. There is a demand for small offices, sub 10,000 sqm with recent lets at around 5,000 - 6,000 sqm Office and workspace requirements are expected to come from local operators. These typically range between 500 – 2,000 Sqm.

- 9.47 Within Romford and the surrounding area there is no specific co-working space (shared office space). The spaces that the site could cater for one could be smaller operators in the market place or the creation of a new local provider by local business leaders and entrepreneurs. The minimum size requirement for a co-working space is usually around 1,000sqm.
- 9.48 It is reported that there is demand for hybrid spaces at the site. This type of space is becoming increasingly popular in the current market place with manufactures and makers, especially within the creative and craft sectors, seeking hybrid spaces that can switch between workshop, office, gallery, retail and event space over the course of a business day. The space is used as much as a showcase and a place where people can sell goods directly to the public, as it is for making and manufacturing.
- 9.49 Policy 21 ensures a proportion of commercial space in larger developments is set aside for affordable workspace. The policy requires that at least 10% of the gross commercial floorspace in these developments be designated as affordable workspace. This affordable workspace provision must be maintained for a minimum period of five years. This will be secure via the S106.
- 9.50 Food and beverage spaces are shown at ground level in Plot A1 with the frontage facing the River Rom, proposed footbridge and access ramp (leading onto the pathway to Waterloo Road). Convenience retail space is within Plot C1 at the southern corner of the site facing the River Rom and Oldchurch Road. It has been identified that there could be opportunities for a gym to operate within the outline component of the site.
- 9.51 Given the commercial uses anticipated to occupy the spaces are not necessarily retail based, it is considered the scale and functions of the uses would sit adjacent to the main town centres uses. The proposal would balance between providing replacement / new light industrial spaces while being flexible to emerging markets, which make use of ground floor frontages and upper floors. As such it is considered the commercial spaces/uses are acceptable.

### Conclusion

- 9.52 In light of the above policy considerations, officers are of the view that there are no in principle objections to a residential-led mixed use development coming forward on this site.

### **Housing Provision / Mix and Affordable Housing**

- 9.53 Policy H4 of the London Plan seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Local Plan Policy 4 seeks at least 35% affordable housing based on habitable rooms and tenure split of 70:30 in favour

of social rent. Policy H6 of the London Plan has at least 30% Social Rent (social rent or affordable rent), at least 30% intermediate (London Living Rent or shared ownership) and the remaining 40% as determined by the Local Planning Authority.

- 9.54 The application was accompanied by a Financial Viability Appraisal (FVA). The viability scenarios have been reviewed by the Council's appointed viability consultants who have concluded that the amount on offer is the most that can viably be achieved at the present time.
- 9.55 Following the above review, the applicant submitted an addendum in response and concluded that the scheme cannot viably provide any affordable housing based on present day industry standard assumptions. Notwithstanding this, the applicant has confirmed they are committed to delivery of the scheme with Affordable Housing in addition to CIL contributions and other financial contributions to make the proposal acceptable in planning terms.
- 9.56 The proposals will provide 35% affordable housing by habitable room across the development, however, the tenure mix of the affordable housing will be 70% intermediate and 30% social/affordable rent subject to early, mid and late stage viability reviews. The level of affordable housing proposed is consistent with London and Local Plan policy in terms of the level of provision. Although falls somewhat short of policy aspirations in particular with regards to the tenure mix where it is the reverse of the Council's priority, i.e. social rent to shared ownership. Given that the scheme is shown to be unviable even without providing any affordable units, it would be difficult to justify refusal on these grounds alone.
- 9.57 Given the size and timescales of the development in delivering up to 1070 residential units over 5 phases, an early, mid and late stage review mechanism will be required to be secured via the legal agreement in line with the London Mayor's Affordable Housing and Viability SPG. Additionally, the phasing of the affordable housing delivery by tenure will also be secured via the s106 legal agreement.
- 9.58 It is therefore considered that the percentage and tenure of housing is on balance acceptable given the viability situation and would seek to 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

- 9.59 London Plan Policy H10 encourages new developments offer in a range of housing mix choices. The above policy stance is to allow Londoners a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.



- 9.60 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, with 80% of the units being 2 and 3 bed units.
- 9.61 Tables below set out the residential mix in phase 1, with the first table setting out the housing mix for the whole phase, and the following tables split the provision over plot A and B by unit type.

**Table 5.2: Total Phase 1 Residential Unit Mix**

Unit Type	Affordable Rent	Shared Ownership	Private	Total	Unit Percent
1B2P	11	27	98	136	35%
2B3P	15	33	45	93	24%
2B4P	7	16	95	118	31%
3B4P	1	1	0	2	0.5%
3B5P	5	10	16	31	8.8%
3B6P	0	0	1	1	0.2%
4B6P	0	0	1	1	0.2%
4B7P	0	0	1	1	0.2%
<b>Total</b>	<b>39</b>	<b>87</b>	<b>257</b>	<b>383</b>	<b>100%</b>

**Table 5.3: Phase 1 Plot A Residential Unit Mix**

Unit Type	Unit Number	Unit Percent
1B2P	74	32%
1B2P (WCH)	14	6%
2B3P	35	15%
2B4P	82	36%
2B4P (WCH)	8	3%
3B5P	13	6%
3B6P	1	0.4%
4B6P	1	0.4%
4B7P	1	0.4%
<b>Total</b>	<b>229</b>	<b>100%</b>

**Table 5.4: Phase 1 Plot B Residential Unit Mix**

Unit Type	Unit Number	Unit Percent
1B2P	48	31%
2B3P	58	38%
2B4P	28	18%
3B4P	2	1%
3B5P	18	12%
<b>Total</b>	<b>154</b>	<b>100%</b>

- 9.62 The housing mix in phase 1 would provide 65% two bed or more units, with a significant proportion of 2b4p units which are identified by the Council as of much need in terms of affordable demand. Whilst the proportion of 1 beds is high, on balance this is acceptable given the sites location in the metropolitan town centre and proximity to the railway station.
- 9.63 For the reasons outlined above and subject to the relevant legal obligations set out earlier in this report, it is considered that the development accords with key policy objectives in relation to housing and affordable housing provision.

### **Standard of Design, Layout, and Impact on Views**

- 9.64 The NPPF at paragraph 135 advocates that developments should 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 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.
- 9.65 Policy D3 of the London Plan encourage the optimisation of sites through a design-led approach, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the development design, as described in Policy D4 of the London Plan.
- 9.66 Policies D3 and D4 of the London Plan require that buildings, streets and open spaces should provide a high-quality design response that has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion, appearance, shape and form.
- 9.67 Policy D9 of the London Plan places great emphasis on the intention that tall buildings should be plan-led at the local level. It defines what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. The policy is clear that “Tall buildings shall only be developed in locations that are identified as suitable in Development Plans”. The proposal consists of building heights ranging between 5 storeys for the new school block, up to 14-storeys in height which meets the definition of a tall building as set out Part A of Policy D9 of the London Plan. Part B of Policy D9 makes it clear that

tall buildings should only be developed in locations identified in local plans as being suitable for such buildings.

- 9.68 Supporting text to Policy D9 of the London Plan states that whilst high density, does not need to imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as main centres of activity, and important street junctions and transport interchanges. Tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London's cityscape, and many tall buildings have become a valued part of London's identity.
- 9.69 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.
- 9.70 The Romford Town Centre Masterplan SPD (2025) sets out strategic ambitions for development, with themes including Space and Landscape, Movement and Connectivity, Sustainability, Inclusion Health and Wellbeing, Character and Townscape, Uses and Mix and The Economy. It also sets out more detailed Site Specific Guidance for some areas of the Town Centre. The Bridge Close site does not sit within one of these areas, but is adjacent to the 'Rom Valley Way, and 'Station Gateway' areas.
- 9.71 The overall vision set out in the Masterplan is as follows: Building on its unique character and history, Romford will be a mixed, vibrant, inclusive and distinct regional town centre. It will consist of an enhanced retail offer complemented by a rejuvenated market, with a focus on local goods, culture, services, greening of the town centre, and celebrating the River Rom. It will maintain its role as a major leisure destination, with an enlarged employment offer, an early evening food and beverage offer, with existing and new residential communities supported by additional health and school facilities.

#### Appraisal of design approach

- 9.72 The site is within the Romford Strategic Development Area, the Metropolitan Town Centre, London Plan Opportunity Area, Housing Zone and the Local Plan considers

that tall buildings may be acceptable in this area, in the vicinity of the station, subject to high quality design and public realm. The adopted Romford Area Action Plan 2008 does not allocate the site for tall buildings.

- 9.73 The Romford Masterplan has recently been published which includes the area of the application site. Although the Masterplan does not provide specific guidance for the application site it does identify the site is within an area that could accommodate between 4 to 8 storey buildings with potential of taller elements subject to demonstration of appropriateness. The Romford Town Centre Masterplan and the LB Havering Character Study (2024) highlight that the areas where tall buildings are most appropriate in Romford are largely clustered around Romford Station and the ring road surrounding the town centre. The proximity of the Bridge Close site to both Romford Station and Waterloo Road mean that it is in an area where taller buildings are most appropriate, and densities should be optimised to help deliver on housing targets. Therefore, this would satisfy Part B of London Plan Policy D9.
- 9.74 The proposal represents a step up in density in relation to the existing context that would result in a change of character. It is considered that the high quality of design helps to ensure the emerging character will be a positive one that will have benefits for this area of Romford. The Romford Town Centre Masterplan places emphasis on new development that creates a clearly defined street network and a clear sense of place. The proposal responds successfully to this ambition, with a layout that creates high quality streets and public spaces. The proposed massing has been designed to minimise adverse impacts, and careful attention to materials and detailing has been demonstrated.

#### Quality of public realm

- 9.75 The proposal responds to ambitions set out in the Romford Masterplan and the Local Plan to improve pedestrian and cycle connectivity in the Town Centre, provide some naturalisation to the River Rom, and create a greener and more child friendly places. The proposed pedestrian crossing over Waterloo Road, and new bridge connection towards Lidl create improved east west connections, while the proposed riverside walk improves north south connections. This helps to ensure the new public spaces are easily accessible, and that the wider area is better connected.
- 9.76 The River Rom is currently canalised in a concrete channel and has limited benefits in terms of biodiversity and amenity. The proposal will regrade the western riverbank to create more naturalisation, with planting within the bank and surrounding area. Proposed buildings are set back at least 8m from the river channel, allowing a new route to be created. The central square links to the river to create play spaces and amenity with direct links to the river. Public spaces have been designed to accommodate London Plan requirements for 10sqm of play space/child (for under 12s) and Urban Greening Factor of at least 0.4 across the scheme.

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

- 9.77 The application site is located in a mixed use area adjacent to Waterloo Road which is flanked on the west by existing 5 storey apartment blocks. To the northwest between the site and the railway station is a 9 storey apartment block. Further to the south is the Seedbed development, with proposed heights ranging up to 12 storeys and the Ice Rink having between two and 12 storey apartment blocks. Whilst immediately to the east (Regarth Avenue) is mainly two storey with height increases to 8 storey in the northern part of the Station Gateway area indicated in the Romford Masterplan Plan.
- 9.78 The detailed proposals in Phase 1 reflect a contemporary style and comprises two principal building blocks straddling the ramp leading to the proposed footbridge. Block A, split either side of a podium level is positioned centrally in the north of the site. In respecting the edge of the site and the River Rom Block A1 has a shoulder height of eight storey. To reduce height adjacent to the pedestrian route a further shoulder has been created on Block A2 of eight storey. Block B continues at eight storey with the top floor partly recessed from the building line. The school reduces to an elongated (allowing for greater heights of floors and rooftop level) four storey.
- 9.79 The outline elements of the application show Block C1 to be fourteen storey reducing to five storey along the north, an intervening 10 storey tower with C2 returning to 14 storey with an eleven storey shoulder facing Bridge Close Block D has 10 storey sections ending the block and a further central ten storey section. The overall massing along Waterloo Road has been reduced by the intervening lower sections and a narrow shoulder facing the internal road. The proposed massing for Block E climbs up to 13 storey which would be a step down with the adjacent Block A.
- 9.80 Careful consideration has been given to the design and massing of the residential tower blocks with the majority of the higher parts providing markers along Waterloo Road and Oldchurch Road and set within the site. The distribution of height and massing throughout the blocks is well balanced and the separation between the apartment blocks is considered to be suitable. Taking into account the approvals of scheme close to the site at the Seedbed Centre and the former Ice Rink site the proposed heights and considered to be appropriate to this context.
- 9.81 It should be noted that the design under the outline component would follow under the reserved matters and would need to reflect the Design Code approved as part of this application. The Design Code requires that taller buildings are carefully designed to provide prominent, legible and active frontages with the architectural language of 'marker' buildings and tall elements rooted in the general architectural language of the scheme, expressed in the character, massing, materiality and detailing. Amongst other factors tall buildings must be designed to have a clear base, middle and crown

in the buildings' massing and architectural expression which reduces the perceived mass of taller elements, emphasising the vertical expression to create slender, elegant buildings. This will allow a future design to be principally guided which addresses the edge of the site in creating active frontages at a human scale with the taller sections adding visual interest to the height and massing.

- 9.82 The development is sufficiently set back from Waterloo Road to ensure the building line relates sensibly to surrounding development, and to prevent an overbearing impact upon the streetscene. The use of the green landscape at ground floor and podium softens the appearance of the blocks massing and allows the development to relate well with the surrounding context.
- 9.83 Whilst it is noted that there will be an impact on some properties in Regarth Avenue, the design is stepped in relationship with the two storey houses on Regarth Avenue and Block B, with a lessened impact from the school and the aforementioned houses given the significantly lower height of the school, helping to minimise any adverse impact on these properties. On balance it is considered that the wider public benefits outweigh any potential significant adverse impact to these properties.

#### Quality of residential accommodation

- 9.84 In Plot A (Detailed component) 51% of units will be dual or triple aspect, and 75% of 2-bedrooms and 3-bedrooms units are double or triple aspect. Those units which are categorised as single aspect will benefit from a second aspect to the living space, due to the angled wall and door that offers side access onto their balcony. This enhances the homes in terms of daylight, views and cross ventilation.
- 9.85 Plot B provides 40% dual aspect units and 60% single aspect units. None of the single aspect units in Plot B are north facing. 90% of all dwellings designed to meet building regulation M4(2) Category 2: Accessible and adaptable dwellings. 10% of the dwellings designed to meet building regulation M4(3) Category 3: Wheelchair user dwellings. The proposed residential units are designed to meet the National Described Space Standards.
- 9.86 It is considered that all units are of an acceptable quality.

#### Architectural expression

- 9.87 The full and outline component's architectural expression and design approach is of good quality and in keeping with local character and London Plan policies. The Design Code successfully translates the design principles and the design and material approach setting the precedent for future development of the later phases. Positive elements include the high quality palette of materials, well-considered communal entrances and articulated forms to help break down massing. The balcony

strategy on Block B is particularly successful in creating projecting elements that are well integrated and intrinsic to the building form. The proposed school is an innovative and thoughtful design that would help create a stimulating learning environment with a variety of play areas.

### Design Conclusion

- 9.88 The outline component, through the Design Codes, will have has guiding principles in place to ensure the design and appearance appropriately addresses the height and massing along Oldhchurch Road and Waterloo Road. Overall, the development would contribute positively to the surrounding area and would enhance the area visually subject to securing high quality finish through the details required by condition.

### Residential Amenity

- 9.89 London Plan Policy D6 Housing quality and standards states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy, overshadowing, wind and microclimate, adequate passive ventilation; that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to optimise the development of a site through a design-led approach. It also provides the minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights for all tenures of residential housing.
- 9.90 Policy 7 of the Local Plan requires all development to achieve a high standard of privacy and amenity, and sets out a number of criteria for the consideration of the same. In addition, development should be designed, orientated and positioned in such a way to minimise overlooking between dwellings.
- 9.91 These requirements are also further elaborated within the Mayor's London Housing Design Standards 2023. These set out a benchmark unit per core per floor ratios. Together these form the pivotal backbone for the quality of any future residential accommodation. The SPD details specific space standards for communal areas, storage, bathroom spaces and corridor widths.
- 9.92 In terms of Block A and Block B the Average Daylight Factor (ADF) is a critical metric used to evaluate the quality of natural daylight within indoor spaces. It measures the percentage of natural light available indoors compared to the outdoor light level, providing a standardised way to assess whether a room is adequately lit by daylight. A daylight and sunlight assessment has been undertaken by the applicant using the BRE Guidance which covers future occupiers, the school and existing properties

surrounding the site for the full and outline component of the application. The results are discussed below.

#### Future residential occupiers within site – Phase 1 – detailed application

##### *Daylight for Detailed application Blocks A and B*

- 9.93 All rooms in Block A and B comply with the BRE's Room Depth Criterion (RDC), ensuring well-proportioned spaces for good daylight distribution. Overall, given the density, design and layout of the perimeter and open courtyard blocks proposed, it is considered that the number of dual aspect units has been maximised and the number of north facing single aspects units minimised, which have also been provided with relatively shallow floorplans and staggered/projecting elevations. Chamfered balcony designs minimise obstruction to windows, ensuring good daylight ingress. Living areas in LKDs are prioritised for daylight, with kitchens placed at the rear where light levels are lower but still linked to well-lit living spaces. Lower daylight levels in some areas are attributed to block formation, balcony shading, and design considerations like overheating and acoustics. The proposals will achieve good quality light to the living spaces within the development.
- 9.94 The submitted daylight and sunlight assessment concludes with regard to overshadowing, it is considered that, for the majority of amenity areas, the scheme has been designed to achieve good levels of light.

#### Future residential occupiers within the site - outline plots

- 9.95 In respect of VSC (Vertical Sky Component) on the basis of the facades of the indicative masterplan the scheme as the actual positioning of the windows at this stage is unknown. However, using the parameters and indicative positions of windows, shows that 62% of the facades would receive a VSC of above 27% in line with the BRE Standards, 30% see levels of VSC below 27% but greater or equal to 15% and 8% of the indicative façade areas see levels of VSC lower than 15%. This however would be assessed at the reserved matters stage as each phase comes forward.
- 9.96 For sunlight exposure it has been modelled that 87% of all facades would be in excess of 90 minutes of sunlight exceeding the BRE recommendation. A further 5% of the facades would see more than 60 minutes of sunlight at the equinox and 4% would have more than 30 minutes of sunlight. This is considered to be an acceptable yardstick for receiving good level of sunlight and provide a good base for future reserved matters applications.



### Proposed school

- 9.97 The school's location and 'L' shaped massing were strategically chosen to maximise daylight and sunlight while minimising glare and overshadowing. Layouts include shallow rooms where priority given to classrooms with light from two directions and glazed panels to enhance light distribution, following ESFA guidance.
- 9.98 The updated design changes to the proposed school have been carefully implemented to optimise daylight while balancing other design considerations such as overheating and acoustics. The school has incorporated further improvements, particularly to window heights, to enhance daylight penetration into the classrooms and other spaces. These modifications have been informed by climate-based daylight modelling (CBDM), and has aimed to maximise daylight access and quality, ensuring that a substantial number of rooms meet or exceed the recommended daylight criteria.
- 9.99 Specifically, the assessment indicates that 25 out of 39 rooms achieve the minimum daylight criteria, with some spaces reaching high levels of daylight autonomy and low glare risk. The nursery, which previously had reduced daylight access due to its location, remains a challenging space; however, overall, it is considered the design seeks to better harness available daylight, creating a well-lit environment conducive to learning.
- 9.100 The school receives very good levels of sunlight, with the courtyard at ground level and the terrace at roof level both performing well. 56% of the school courtyard meets the BRE recommendation for sunlight.

### Surrounding buildings / land uses to the site

- 9.101 It is noted that there would not be a significant impact from the proposed development to the land to the north of the application site. The land to the south is the recently vacated Homebase Retail Store, which given the circumstances would experience little impact from the proposed development.
- 9.102 The following sections will consider the impact on light and outlook on the surrounding buildings from the detailed and outline component. Although the effect to light for the outline component has been based on the parameters plans submitted, the assessment also considers an illustrative scheme. The illustrative scheme is an accurate example of what could be built from the reserved matters applications if following the design codes applied for in this application.

### *Detailed Application*

- 9.103 A key consideration for Charrington Court is that the windows all face due west, therefore the availability of sunlight throughout the year is diminished by

approximately 50%, coupled with overhanging balconies that limits access to sunlight. The proposed massing sits in a location that is key for the windows within the rear apartments of Charrington Court. 41% of windows would achieve BRE compliance (parameters and illustrative). When removing architectural features (e.g. balconies) approximately 90% of the windows meet the VSC criteria and all windows, which experience an alteration, will retain in excess of 23% VSC. It is noted 96% of rooms will meet the NSL target and 57.8% of rooms would meet the BRE criteria for sunlight APSH targets.

- 9.104 1-4 Wells Court is a two-storey apartment building is located to the east of the Site (off Regarth Avenue). The windows would likely see the site from an oblique angle with a key consideration on the impact is that the worst impacted rooms are located on the first floor. This is partially due to the existing architecture of the building with overhanging roof eaves. 55% of windows would comply with BRE Guidelines for VSC. The remaining nine windows will experience BRE transgressions of greater than 0.8. All rooms would meet the BRE's criteria in respect of NSL and sunlight.
- 9.105 The remainder of Regarth Avenue comprises semi-detached properties in a linear lay out with front/rear elevation facing north and south. No. 38 inevitably would see the greatest change as of the 11 windows assessed for VSC, three would comply with the BRE Guidelines while five of the eight affected windows would retain VSC levels between 23.4% and 26.4% with three remaining windows retaining between 4.5% and 13.1%. In terms of NSL, all six rooms assessed would meet BRE's criteria but would see reductions in sunlight. Then moving along Regarth Avenue towards South Street the impact lessens to the other neighbouring properties but still remains significant.
- 9.106 Overall, while some reductions in daylight and sunlight are acknowledged—particularly for properties closest to the site—the impacts are not considered so significant as to outweigh the substantial public benefits of the development. These include the delivery of much-needed housing, affordable homes, a new school, community facilities, and significant public realm improvements.

#### *Outline component*

- 9.107 The west side of Waterloo Road have a number of existing apartment blocks with balconies and windows that face east over the application site. Given the low rise of existing buildings within the application site, windows that are easterly facing have long ranging views and outlook. The majority of rooms receive good levels of light and see obstructions to windows created by architectural detailing, building recesses and balconies relatively unobstructed.
- 9.108 The outline component of the Bridge Close development will have varying impacts on daylight and sunlight levels for existing apartment blocks along the west side of

Waterloo Road. These buildings currently benefit from long-range easterly views due to the low-rise nature of the site. The assessment shows that while some reductions in daylight will occur, particularly in buildings like Charrington Court and Pulse Court, the majority of windows across all affected buildings will still meet or closely approach BRE guidelines for Vertical Sky Component (VSC) and No Sky Line (NSL).

- 9.109 Overall, while some reductions are noted, particularly in buildings with more obstructive architectural detailing, the impacts are not considered severe or widespread enough to outweigh the broader public benefits of the development.
- 9.110 It is recognised there would be a noticeable reduction in the internal light for a number of habitable rooms below the BRE recommended levels, however, the reductions need to be carefully weighed against the significant wider benefit the development would bring to the area

### **Fire Safety**

- 9.111 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. 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, should accompany major applications.
- 9.112 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.
- 9.113 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.
- 9.114 It should be noted that the application was submitted prior to the revision in British Standards for Fire Safety, however, in this instance Officers can advise there are

transitional arrangements in place where the previous guidance can be used to consider the fire risk for a proposal until 30 September 2026 when the transitional provisions expire. This approach adopted by HSE allows developments to be considered on their current trajectory. Then at a later stage for the necessary changes to be made to the scheme to satisfy the new guidance and incorporated to gain Building Regulations Approval before the transitional period expires. The HSE has been consulted and have raised no objection to the proposal on the basis of the previous guidance. They have highlighted where the scheme would need further consideration to satisfy the new guidance, which again is in line with the advice relating to assessing fire risk in the transitional period.

- 9.115 It is therefore considered that fire safety of the proposed development and the fire safety information satisfy the requirements of Policies D12(A) and D5(B5). Compliance with the fire statement submitted shall be secured through the imposition of a planning condition should the application be recommended for approval.
- 9.116 Changes required to satisfy the new BS guidance would be more appropriately addressed under a separate application as any amendments may alter other parts of the scheme to achieve compliance.

### **Highway Matters**

- 9.117 London Plan policy T4 states that 'when required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance'. Policies T2 and T5 relate to healthy streets, the provision of cycle and pedestrian friendly environments, whilst policy T6 relates to parking standards. Local Plan policies 23 and 24 seek support development which ensures safe and efficient use of the highway and demonstrates that adverse impacts on the transport network are avoided or, where necessary, mitigated and reinforce the aims of London Plan policy T4, which aims to contribute to modal shift through the application of parking standards and implementation of a Travel Plan.
- 9.118 The application is accompanied by a Transport Assessment. The Council and TfL have also undertaken traffic modelling as part of a wider exploration of traffic generation and its potential mitigation, associated with the development. The TA has been fully considered by the Highway Officer who has not raised any objections to the proposal.

## Access and Layout

- 9.119 The public realm is structured around key character areas—Main Square, Civic Square, Rom Walkway, and Waterloo Gardens. A new pedestrian and cycle bridge over the River Rom forms a key east-west link between Romford Station and the development, supported by a network of primary pedestrian routes and crossings aligned with Havering's Liveable Neighbourhoods programme. The Rom Walkway, a shared pedestrian and cycle path along the river, connects key public spaces and building entrances, enhanced by landscaping, seating, and lighting. Cycle infrastructure includes a principal segregated route from Romford Station to Waterloo Road, with secondary routes along the river and Bridge Close.
- 9.120 A 50mm kerb and raised table crossings define pedestrian zones and ensure accessibility for visually impaired users. Pedestrian access routes include gentle gradients, rest points, tactile paving and lighting. Drop-off points are provided near all building entrances, with a dedicated bay for SEND pupils at the school. Emergency access is ensured via the central street and around Plot B, with clear routes to dry riser inlets.
- 9.121 TfL acknowledges that the revised scheme satisfactorily addresses the concerns relating to multi-modal access and layout and now align with the Healthy Streets and Vision Zero principles. The submission of a Stage 1 Road Safety Audit (RSA) is supported. The updated design for the eastern landing of the new pedestrian and cycle bridge at Atlanta Boulevard, near Lidl is also supported. TfL does however note that future designs must protect TfL's bus infrastructure and avoid encouraging pedestrian or cyclist movement through the bus standing area. This will be agreed within the car and cycle parking details plan which will be sought via condition. The revised scheme provides access from Old Church Road roundabout which is considered acceptable in principle however further details regarding geometries and dimensions via a car and cycle parking details plan which will be sought via condition. It is noted that any access must support all transport modes and align with Healthy Streets and Vision Zero principles, as well as the Romford Masterplan SPD.
- 9.122 TfL supports the proposed relocation of the Waterloo Road pedestrian crossing to better match the east-west desire line and integrate with Union Road. Some concerns remain about the signal design and traffic modelling, particularly regarding impacts on bus services and pedestrian safety. TfL and the LPA have agreed that this remodelling can be undertaken by a pre-commencement condition. The remodelling must also remove the proposed crossing by Old Church Road which is located of the existing eastbound bus stop. Whilst it is regrettable that the existing footbridge to Regarth Avenue will not be retained or improved, the proposal to reposition it further north and provide an improved facility is considered acceptable.

- 9.123 Internally, the east-west pedestrian/cycle route's staggered alignment is mostly acceptable but concerns are raised that it may cause confusion or conflict. Design revisions should be explored to soften the staggered layout and provide further details in the car and cycle parking details plan which will be sought via condition. The additional information should include details on appropriate materials, tactile paving, signage, and wayfinding. The car and cycle parking details plan is also required to provide clarification on the long-term management of the footbridge and internal routes, including details on cyclist access to the River Rom Walkway.
- 9.124 A night-time ATZ assessment has been carried out. The assessment identified several areas for improvement across the routes, including on lighting levels in different parts of the town centre, crossings, lack of tactile paving, footway widths and presence of street furniture and bollards and underpasses, and particularly the difference in lighting between the central parts (generally well-lit) entries/ exits (with insufficient lighting). A suitable financial contribution 'and/or S278 towards these improvements is required. The contribution will also consider crossings along the ring road or actual works off site. The obligations will represent a necessary commitment that the applicant will have to make towards the active travel improvements to make the development acceptable in an area dominated by road infrastructure and vehicles. As such, subject to suitably worded conditions and secured contributions, the proposal is considered to comply with Policy T1, T2, T4 and T9 of the London Plan (Healthy Streets).

### Parking

- 9.125 A total of 44 spaces are proposed, all designated as blue badge bays except for two car club spaces. Servicing is managed through four loading bays located on internal streets, with on-site management to oversee operations. Waste is handled via an Underground Refuse System (URS), with 53 bins distributed across the site and bulky waste stores within each plot.
- 9.126 The revised scheme has removed all non-disabled residential and commercial parking in later phases, which aligns with the site's high PTAL rating and town centre location. A car free agreement for all future phases will be secured through a Section 106 agreement. The TfL does not support the inclusion of general parking in phase 1 however has agreed to further assessment of the sites parking layout in the form of a robust management plan which will be secured via condition which will require agreement in writing prior to construction. The management plan is required to mitigate safety risks and potential conflicts during construction.
- 9.127 The proposed provision of 3% disabled parking is acceptable. TfL states that these spaces must be reserved exclusively for Blue Badge holders and allocated based on need, not tied to specific units. The swept path analysis is considered acceptable however TfL notes that some internal tracking overlaps kerbs and may require

minor adjustments at the detailed design stage. The layout of five disabled bays near Plot C2 needs refinement due to limited reversing spaces. It is considered that these matters noted can be agreed at detail stage and will be condition accordingly. The aforementioned cycle parking will also be agreed via condition.

### Servicing and Deliveries

- 9.128 Regular servicing will include deliveries of supplies to commercial units—primarily via light goods vehicles (LGVs) or cargo bikes—postal and online grocery deliveries to residential units, courier services, and facilities management tasks such as window cleaning and maintenance. Additionally, there will be occasional deliveries of bulky items like furniture and visits from engineers for services such as telecommunications and plumbing.
- 9.129 Servicing and deliveries will be managed via central and local streets within the site, with four designated loading bays to facilitate these operations. On-site management, based in Plot A, will oversee logistics to ensure smooth functioning. For the school located in Plot B, a dedicated drop-off bay accommodating two minibuses is planned to support pupils with special educational needs and disabilities (SEND).
- 9.130 During Phase 1 of the development, temporary arrangements include a two-space drop-off bay for the school and surface parking for the HICC and LAS facilities. These provisions are part of a broader strategy to maintain accessibility and operational continuity during construction. The waste collection system integrates with servicing routes, using an Underground Refuse System (URS) with passing areas to allow traffic flow during bin collection. Commercial and school waste will be managed separately, with dedicated storage and collection points.
- 9.131 TfL generally supports the servicing and deliveries aspects proposed subject to relevant conditions. The revised scheme has removed the loading bay on Old Church Road which is welcomed by the TfL and consider the proposal for deliveries to take place entirely within the site as acceptable. The internal road, expected to be adopted as a public highway, will allow LB Havering to enforce loading bay use. Refuse collection will also be managed on-site via an Underground Refuse System (URS). The TfL have however requests Loading Bay 1 (serving Plots C1, C2, and D2) is relocated slightly eastward to better balance access across the blocks and reduce its proximity to the roundabout. It is agreed by the TfL that this can be amended during detail stages and will be ensured via condition. TfL agrees that the submitted Delivery and Servicing Plan is broadly acceptable as a framework, however additional information regarding details on service management and monitoring will be secured via condition.

## Travel Demand

- 9.132 Pedestrian access is prioritised through a network of Primary Access Routes (PARs) that connect key parts of the site, including entrances to buildings, public spaces, and transport nodes. The proposal includes a new pedestrian bridge over the River Rom linking Romford Station directly to the development forming a connect east-west through the town centre. Additional crossings are also proposed at Waterloo Road and Old Church Road which align with Havering's Liveable Neighbourhoods programme. Vehicular parking has been reduced with the aim of create a less vehicle reliant development and promote the use of public transport. It is agreed that the proposed strategy supports a shift toward active and public transport modes, aligning with broader sustainability and inclusivity goals while ensuring the site remains functional and accessible.
- 9.133 In response to initial feedback from the TfL, a revised transport assessment was submitted amending trip generation and mode share which TfL considers to address previous concerns and is now a suitable basis for assessing the developments transport impact. Overall, the travel demand model is now deemed fit for purpose.

## Impact and Mitigation

- 9.134 The revised scheme demonstrates a significant increase in trip generation compared to the initial proposal. Regarding bus services the evidence provided indicates that existing routes can accommodate the projected demand, and therefore no mitigation measures are required. For rail impacts at Romford station, the applicant is required to submit updated gateline assessment results to determine whether additional gates are necessary which will be sought via condition. This analysis should reflect the revised demand figures. If capacity is exceeded, the provision of extra gates must be considered. Additionally, Platforms 1 and 2—used by the Liberty line and Greater Anglia off-peak services—currently lack modern step-free access. Although a ramp is available, it is steep and does not meet current accessibility standards. TfL considers this a priority and is requesting a financial contribution of £150,000 towards a feasibility study.
- 9.135 Furthermore, under the Romford Masterplan SPD, Havering has aspirations to create a second (western) entrance to Romford station. This would benefit the surrounding area and is directly relevant to the development site. While TfL does not currently promote this entrance, they support it in principle, subject to further discussions and funding in the form a financial contribution to the project which will be agreed within the S106. If the timing does not align with this development, Havering should consider allocating the contribution to other sustainable transport improvements or mitigation measures.



9.136 In terms of highways, the car-free nature of the scheme means vehicular impacts will be limited. However, changes will arise from the proposed relocation of the signalised crossing on Waterloo Road, which will now include the junction with Union Road and operate differently. TfL and LB Havering have reviewed the LinSig analysis and raised concerns about the methodology and conclusions. Subject to written agreement from TfL, conditioning this aspect is acceptable. As part of the s106 agreement or an alternative legal mechanism, signal upgrades must be secured to optimise junction performance and minimise adverse impacts on all users.

#### Travel Plan

9.137 A revised Framework Travel Plan (TP) has been submitted and is broadly acceptable for the purposes of this application. However, it does not appear to address car parking provision for the first phase of the development. This is a concern, as parking for this phase is not supported and should be removed. To ensure effective implementation, a site-wide Travel Plan—along with individual plans for each use and phase—must be secured, enforced, monitored, and reviewed through the Section 106 agreement, in line with London Plan Policy T4.

#### Construction and phasing

9.138 A revised Outline Construction Logistics Plan (CLP), dated December 2024, has been submitted. While initial discussions have taken place with TfL and the borough since its submission, the document does not reflect the latest communications, and no agreements have been reached on any matters to date.

9.139 TfL argue that the latest Outline Construction Logistics Plan (CLP), dated December 2024 lacks detail to assess whether construction activities can be carried out safely with minimal disruption. Key elements such as the construction programme, phased site use requirements, access arrangements, road safety audits, swept path analysis, and impacts on sensitive receptors, local residents, third-party schemes, and cumulative effects are either inadequately addressed or entirely omitted. As a result, compliance with London Plan Policy T7 has not been demonstrated. Specific details are also required regarding access, parking, and operational needs for the community centre and the Ambulance centre, which are expected to remain operational during the initial construction phase. Given the nature of the revisions required, it is considered acceptable that the updated Outline Construction Logistics Plan (CLP) is sought via a pre-commencement condition which will require further assessment from the TfL.

9.140 In conclusion, proposals are acceptable subject to conditions for car and cycle parking, a Parking Design and Management Plan, a Delivery and Servicing Management Plan, a Travel Plan, a detailed Construction Logistics Plan, and finalised designs for the proposed crossing.

## Heritage

- 9 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that, when determining planning applications that may affect a listed building or its setting, local planning authorities must give special consideration to the desirability of preserving the building or its features of special architectural or historic interest. This provision emphasises the importance of protecting designated heritage assets and their context, ensuring that any development preserves their significance and character while balancing other planning considerations.
- 9.141 Policy HC1 in the London Plan focuses on the protection and enhancement of London's heritage assets, including listed buildings and conservation areas. The policy also mandates that any proposals should avoid causing harm to the significance of heritage assets and suggests that any instances of harm must be justified, showcasing an overall commitment to preserving London's cultural heritage while allowing for appropriate development.
- 9.142 London Plan Policy D9 emphasises the importance of safeguarding heritage assets to ensure that new developments do not detract from their significance or setting. Specifically, proposals for tall buildings must carefully consider their potential impact on London's heritage and must avoid harm to heritage assets and their settings. If a development risks impacting heritage assets, applicants are required to provide clear and convincing justification, demonstrating that they have explored alternatives and that the public benefits of the proposal outweigh any harm.
- 9.143 Local Plan Policy 28 aims to protect and enhance the borough's heritage assets, which include listed buildings, conservation areas, and other significant structures. This policy emphasises the need to recognise and value the historic and architectural significance of these assets, ensuring that any development proposals do not cause harm to their character. Furthermore, the policy encourages initiatives that enhance the significance of heritage assets while aligning with national guidelines from the National Planning Policy Framework (NPPF).
- 9.144 The existing buildings on the site are of no heritage value, therefore the proposal for their demolition is not considered significant. The application site is not within the immediate setting of any designated heritage assets, however it forms part of the wider setting of two listed buildings and Romford Conservation Area. Adjacent listed buildings are Church of St Andrew, Grade II (List Entry Number 1184660) and Salem Chapel, Grade II, List Entry number 1079900. A group of listed buildings are located further apart within the historic core of Romford Town Centre. The site is within the setting of the locally listed Page Calnan Building and a row of Victorian semi-detached houses on South Street (nos. 230-268 South Street) also listed locally.

### Effect on significance

- 9.145 The site currently does not form the physical surroundings or make contribution to the setting of any listed buildings or conservation areas. The wider setting of the heritage assets mentioned above, within which the site is located, is predominantly urban and commercial in character and include many tall buildings including residential tower blocks. As such, the proposed development is not considered to cause a considerable change to the general character, built surroundings and spaces of the locale.
- 9.146 Although a number of largescale buildings of considerable height and massing would be introduced, it is not considered the wider setting of the nearest listed buildings or those in the centre of Romford Town would be adversely affected. Romford Conservation Area itself is an urban town centre and inherently commercial in character. It is now surrounded by large scale mixed-use and commercial buildings. Within such a context, the proposed development would assimilate into the backdrop of distant views out of the conservation area, therefore no impact to the significance of the conservation area is envisaged.
- 9.147 Nevertheless, the proposed development, owing to the overall bulk and height, would bring a notable change in the immediate setting of the locally listed Page Calnan Building. The setting of the locally listed buildings on the west side of South Street would also be affected. In particular, the backdrop of the Page Calnan building, in views of its principal façade at the junction of South Street and A1251 would be significantly overshadowed by the proposed development. Page Calnan Building is locally listed for its architectural and historic interest. Owing to its form and prominent sitting with open frontages, the building holds considerable landmark quality that contributes to the local character and appearance. The proposed tower blocks would impede the skyline behind it obscure the silhouette of the building when viewed from the front. Consequently, its significance deriving from its landmark quality would be adversely affected.
- 9.148 With regard to the row of Victorian houses at South Street, the impact upon their setting would be low, though still harmful due to the location and sitting of the development in relation to key views from these houses across the River Rom running along their rear boundary.

### Public benefits of the scheme

- 9.149 The NPPF itself does not define what public benefits are for this purpose. Further guidance is given in the Historic Environment Chapter of the PPG. This refers to anything that delivers the economic, social or environmental objectives of sustainable development described in paragraph 8 of the NPPF. The PPG makes clear that the public benefits must flow from the development and must be of a nature or scale that

would benefit the public at large but these benefits do not always have to be visible or accessible to the public or to all sections of the public to be genuine public benefits. In this instant, the proposal would rest within two objectives of sustainable development, namely social and environmental.

- 9.150 This application specifically seeks to provide a wide range of benefits that support both local regeneration and strategic planning objectives. It will transform a major underutilised brownfield site into a high-quality, residential-led mixed-use scheme that aligns with the vision for Romford and the Strategic Development Area. The scheme will deliver up to 1,070 new homes in a highly sustainable location, including 35% affordable housing and a mix of unit sizes to support a balanced community. It also includes new retail and employment spaces—20% of which will be affordable—along with a health and community hub, a new primary school and nursery, and high-quality public realm enhancements. These include landscaped open spaces, play areas, and a new pedestrian route linking the site to the station and town centre. The development will also open up the River Rom and improve access to the wider cycle network.
- 9.151 It is the Local Planning Authority's duty to ensure that through careful decision-making, development should maintain and manage change in a way that sustains, and where appropriate, enhances the heritage significance. Where, as here, the harm has been assessed as is considered to be less than substantial, it is the duty of the Local Planning Authority to consider whether the public benefits of the development would be sufficient to outweigh the less than substantial harm identified. Those public benefits include the economic, educational and socio-economic benefits identified above.
- 9.152 While the site currently holds no unique heritage significance, the surrounding historical assets have been acknowledged in the planning consideration. The intention is to minimise any potential impacts on the appreciation and visibility of these nearby heritage sites, further ensuring that the design aligns with the community's historical context while providing necessary housing solutions. Thus, the application represents a forward-thinking approach to urban regeneration that respects and incorporates the historical essence of the locale.
- 9.153 It is considered the public benefits noted above outweigh any less than substantial harm relating to the designated heritage assets and is therefore acceptable. As such the proposal would satisfy LP Policy D9, HC1 and LBH Policy 28.

#### Archaeology

- 9.154 NPPF Section 16 and the London Plan (2021 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 paragraph 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.

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

### **Sustainability and Energy Efficiency**

- 9.156 Paragraphs 155 - 158 of the NPPF relate to decentralised energy, renewable and low carbon energy. Chapter 9 of the London Plan contains a set of policies that require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions ,where the residential element of the application achieves at least a 35 per cent reduction in regulated carbon dioxide emissions beyond Part L Building Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Specifically, Policy SI2 sets out an energy hierarchy for assessing applications, as set out below:

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

- 9.157 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. A concluded assessment has not been received from Aecom or the GLA with regarding to sustainability and energy efficiency however the additional information required will be sought via condition to provide flexibility for further review.

### **Ecology and Biodiversity**

- 9.158 London Plan Policy G6 aims to protect and enhance biodiversity across the city by safeguarding designated nature sites, promoting ecological networks, and ensuring developments deliver a net gain in biodiversity. It encourages the integration of green

infrastructure such as green roofs and walls, and supports improved access to nature, particularly in areas with limited provision. Boroughs are expected to adopt a strategic approach, using ecological surveys and biodiversity action plans to guide planning decisions and ensure the natural environment is protected and improved for both wildlife and people.

9.159 Havering Local Plan Policy 30 states that the Council will protect and enhance the Borough's natural environment and seek to increase the quantity and quality of biodiversity by ensuring developers demonstrate that the impact of proposals on protected sites and species have been fully assessed when development has the potential to impact on such sites or species. It is important that proposed enhancements for the site are maximised in terms of their benefit for biodiversity, and consideration should be given to wildlife friendly landscaping including green roofs and green walls to help enhance the ecological biodiversity of the site. Consideration should also be given to the incorporation of bat boxes and species specific bird boxes on or built into the fabric of new buildings.

9.160 The development falls within the thresholds as set out in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, whereby an EIA is required for the purposes of assessing the likely significant environmental effects of the development. A Scoping Opinion was previously issued on the 24th January 2022, which commented on the approach and methodology for assessing the impact. An Environmental Statement addendum has been submitted following submission of revised information. The following table summarises the topics covered and where amendments have been made to the Environmental Statement:

Table 4: topics covered and amendments to the Environmental Statement		
Chapter	Amendments	Justification
Introduction	No	No material changes to the Introduction.
Site and Environmental Context	No	No material changes to the Site and Environmental Context.
The Proposed Development	No	No material changes to the Proposed Development.
Demolition, Construction and Site Management	No	No changes are proposed to the demolition, construction and site management set out in the 2023 ES.
Assessment Methods	No	No changes are proposed to the assessment methods set out in the 2023 ES.
Planning Policy Context	Yes	Since the submission of the 2023 ES the NPPF has been updated. The changes to the NPPF have been

		reviewed and do not materially alter the conclusions of the 2023 ES.
Socio-Economics	No	In response to comments received from NHS North East London and the London Healthy Urban Development Unit, further information and clarification has been provided in the Chapter 4 of this ES Addendum and Health Impact Assessment (HIA) (Appendix O) and Design and Access Statement (DAS) (submitted separately).
Flood Risk and Hydrology	Yes	In response to comments received from the Environment Agency, further information has been provided in relation to the proposed restoration works to the River Rom (ES Addendum Chapter 5 and Appendix F). The results of the updated Flood Risk Assessment (FRA) do not alter the conclusions in the 2023 ES.
Ground Conditions	No	No comments received in relation to ground conditions and contamination.
Transport and Access		Further information was provided following comments received from the GLA and LB Havering (ES Addendum Chapter 6 and Transport Technical Note (Appendix M and N)).
Noise and Vibration	No	No comments received in relation to Noise and Vibration.
Air Quality	Yes	Further information was provided following comments received from Havering in relation to the Air Quality (ES Addendum Chapter 7 and Appendix G). The results do not alter the conclusions in the 2023 ES.
Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution	Yes	As a result of design changes since the 2023 ES as well as comments received from LB Havering the Daylight, Sunlight, Overshadowing, assessment was updated (ES Addendum Chapter 8 and DSO Technical Note (submitted separately)). The results do not alter the conclusions in the 2023 ES.
Archaeology and Cultural	No	No comments received in relation to archaeology and cultural heritage.

Heritage		
Environmental Wind	Yes	A quantitative wind impact assessment was requested by LB Havering. A qualitative wind impact assessment was undertaken using Computational Fluid Dynamics (CFD) modelling (ES Addendum Chapter 9 and Appendix G). The results of the qualitative wind impact assessment do not alter the conclusions in the 2023 ES.
Biodiversity	Yes	In response to comments received from the Environment Agency, a River Morph5 survey was completed of the River Rom (ES Addendum Chapter 10 and Appendices I and J). The results of the River Morph5 survey and Ground Level Tree Assessment do not alter the conclusions in the 2023 ES.
Impact Interactions	No	No additional impact interactions were identified since the preparation of the 2023 ES.
Schedule of Mitigation and Monitoring	No	No further mitigation has been identified since the preparation of the 2023 ES.

9.161 The ES and the addendum has considered the potential significant environmental effects associated with the development. The ES has also considered potential cumulative effects including a series of sensitivity tests to ensure that all significant environmental effects and necessary mitigation are identified based on the information available at the time of assessment. The principal issues raised under the ES topics are discussed in the Assessment Sections.

9.162 The application is accompanied by an Environmental Statement (ES), which includes consideration of the ecological and biodiversity interests on the site. The Environmental Statement and Preliminary Ecological Appraisal has been considered and there is sufficient ecological information available for determination of this application. This provides certainty of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

#### *Impact on ecology*

9.163 The preliminary ecological appraisal identifies that the buildings and certain features have low to moderate potential to support roosting bats, including species such as



the serotine bat, which is a priority species in the Havering Biodiversity Action Plan. There are potential roosting features in the buildings, gaps, and crevices that could be used by bats for shelter and commuting. Additionally, the railway embankment and habitats along the River Rom could support species like slow worms (a locally recorded reptile), and the site's vegetation and structures offer habitat for invertebrates such as stag beetles, although unlikely to be supporting significant populations on-site.

- 9.164 In terms of species, no notable plant species were recorded within 5 km, except for invasive Japanese knotweed, which was identified on and adjacent to the site. Regarding fauna, suitable habitats for notable invertebrates like stag beetles exist along railway banks adjacent to the site; however, the site itself is considered unlikely to support such notable invertebrate assemblages due to limited habitat diversity.

#### *Mitigation measures*

- 9.165 The report outlines several mitigation measures to protect species during the construction and development phases which is set out in the table below.

Table ...: mitigation measures to protect species	
Species type	Mitigation proposed
Bats	Conduct further bat emergence and re-entry surveys for buildings with potential roosting features to determine usage and whether an EPS (European Protected Species) license is required. Implement appropriate lighting strategies to avoid disturbance of commuting and foraging bats, particularly along retained vegetation and habitat corridors. Incorporate features such as bat boxes or roosting sites into new buildings to provide alternative habitats.
Birds	Program vegetation clearance outside the main breeding season (March to August) to avoid disturbing nesting birds. If works occur during the breeding season, a qualified ecologist should check for active nests and establish buffer zones around nests until young have fledged.
Reptiles (e.g., slow worms)	Erect fencing along the railway embankment to prevent reptiles from entering the site during construction. Stop works immediately if reptiles are observed, and report sightings to an ecologist for appropriate action.
Badgers	If works involve the railway bank or potential badger access points, measures such as sensitive handling of mammal holes or potential setts should be employed following advice from an ecologist.

Other mammals	Cover deep holes or trenches overnight to prevent accidental entrapment. Provide escape routes from trenches or excavations for wildlife.
Invasive species (Japanese knotweed)	Implement comprehensive removal and remediation strategies prior to construction to eradicate Japanese knotweed, including fencing and signage for exclusion zones.
General best practices	Implement a Construction and Environmental Management Plan (CEMP) to incorporate pollution prevention, habitat protection, and species safeguarding measures. Maintain hording around the site perimeter to prevent wild mammals from entering during construction phases.

9.166 The above mitigation measures aim to minimise disturbance, prevent harm, and promote conservation of species likely to be present or using the site during and after development. The measures will be secured by planning condition to ensure the development is acceptable against London Plan Policy G6 and Local Plan Policy 30 in respect of species and their habitats within the site.

#### *River Rom Naturalisation*

9.167 Local Plan Policy 31 advocates that the Council will seek to enhance the river environment by requiring major developments in close proximity to a river to investigate and, where feasible, secure opportunities to restore and enhance rivers and their corridors in line with the Thames River Basin Management Plan (RBMP). The application proposed to neutralise the western bank of the River Rom and the existing green space provision, extending it further into the site and creating a new route along the eastern boundary of the site. This will form part of the soft landscaping strategy which will transition between a distinctive riverine planting palette along the Rom, to a linear woodland adjacent to Waterloo Road.

#### *Biodiversity Net Gain*

9.168 If a planning application was submitted before Biodiversity Net Gain (BNG) became mandatory on 12 February 2024 (for major development) or 2 April 2024 (for small sites), it is not automatically subject to BNG requirements, even if the decision is issued after those dates. However, London Plan Policy G6 and Local Plan Policy 30 seek to enhance biodiversity within the site.

9.169 The scheme will result in a net gain of River Units above the standard 10% BNG target. The proposal will result in a significant measurable biodiversity net gain for the river, as well as the terrestrial habitats within the Site. Whilst the proposals include hard surfacing within the bank-top riparian zone, it must be noted that the extent of hard surfacing will be significantly less than the baseline on the western bank. The

soft landscaping has been designed with biodiversity as a key beneficiary, and as such the scheme will have a positive benefit to the local riparian environment.

### Conclusion

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

### **Flood Risk and Drainage**

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

9.172 The site is located within Flood Zone 3, mainly following the River Rom as indicated by the Environment Agency's flood maps. The site is susceptible to fluvial flood risk, primarily from River Rom, as well as surface water flooding.

9.173 The flood risk is assessed as being low to moderate, with modelling results indicating that flood levels during extreme events do not significantly increase beyond existing conditions. The updated assessments and models confirm that, even under severe flood scenarios like the 1 in 100-year event with climate change allowances, floodwaters are contained within the River Rom channel or managed effectively within the floodplain, minimising the impact on the site. Adequate flood mitigation strategies, including maintaining buffer zones and flood resilience measures, are in place to further reduce the potential risk from these water sources.

9.174 The proposed mitigation measures to overcome flood risk at Bridge Close involve a comprehensive approach that integrates both hydraulic infrastructure and landscape management strategies. One of the key components is the upgrade and refinement of the surface water drainage system. The drainage strategy now includes two gravity-fed outfalls into River Rom, which are designed to manage surface water flow effectively. These outfalls are restricted to discharge rates of 35.0 l/s from the northern headwall and 50.0 l/s from the southern headwall, controlling the volume of

surface water entering the river during storm events. Attenuation tanks have been relocated from within the carriageway to areas adjacent to the River Rom, reducing the need for infrastructure within roads that may be offered for adoption and ensuring that surface water is released gradually to prevent overwhelming the floodplain. This controlled release helps in minimizing surface water flood risk on the site and surrounding areas.

- 9.175 In addition to infrastructural improvements, the design incorporates flood resilience principles into the construction and operation of the development. Building levels and layouts are proposed to be informed by the updated flood levels, ensuring structures are adequately elevated or protected against flood events. The development also maintains an 8 metre easement from the culverted main river, providing space for ongoing maintenance and reducing the potential for floodplain blockage. Buffer zones and naturalized riverbanks are incorporated within the river restoration scheme, creating more sinuosity and variability in the river channel. These naturalized banks promote better flow conveyance during high rainfall events, reduce the speed and volume of water flow, and help absorb flood energy, thus reducing the risk of overtopping or inundation of the developed areas.
- 9.176 Furthermore, the river restoration scheme involves removing obsolete or flood-prone structures and replacing them with natural features that support biodiversity while enhancing floodplain storage capacity. The use of sheet piling for the retaining structure allows for a controlled and stable riverbank, enabling soft landscaping and habitat creation in front of the banks. This approach not only improves ecological resilience but also helps attenuate flood flows by creating additional space for floodwaters to spread out and slow down, reducing the likelihood of flooding during larger storm events. Overall, the integrated approach combines hydraulic engineering, ecological enhancement, and strategic land use planning to mitigate flood risks effectively and adaptively manage flood hazards throughout the lifetime of the development.
- 9.177 These measures collectively aim to manage surface water and fluvial flood risks effectively, ensuring the safety and resilience of the development during flood events. The Environment Agency have confirmed that the modelling and proposals are not objectional but need to have an update to the Flood Risk Assessment (FRA) to be able to withdraw their current objection. Subject to an updated FRA and no objection being confirmed by the Environment Agency, it is considered that the proposal satisfies London Plan Policy SI12, SI13, Local Plan Policy 32 and standard 37 of the Housing SPG.

### **Children's Play Space and Urban Green Factor**

- 9.178 London Plan Policy S4 requires development proposals that include housing to make provision for play and informal recreation, based on the expected child population of

the scheme and an assessment of future needs and this is re-enforced by Policy 18 of the Havering Local Plan. Where it is not possible to include such facilities within the development site, the Council will require the facilities to be provided nearby or an off-site financial contribution. The Mayor's SPG 'Providing for Children and Young People's Play and Informal Recreation' contains more detailed guidance, including a benchmark of 10sqm of usable play space per child. The Council's Open Space, Sport and Recreation Study also identifies a need for 1 play area catering for under-11s and 1 for children between 12-16, to meet an existing shortfall in the local area.

- 9.179 The quantum of play space for the full and outline (based on the indicative housing mix) components are summarised below. The required play space for 0-4 year olds is located on podium gardens and roof terraces. The required play space for 5-11 year olds and 12+ year olds will be provided within the public realm of the wider site. These are located in the centre of the plots within the communal amenity areas and benefit from a high degree of surveillance and security.

Table ... - Quantum of play space for the full and outline components		
Age Profile	Play area requirement (using GLA's 'child yield' calculator)	Play area provided
0 – 4 years	1,358 sqm	1,359 sqm
5 – 11 years	932 sqm	942 sqm
12 plus years	422 sqm	479 sqm
Total	2,712 sqm	2,780 sqm

- 9.180 Given the outline element and final residential mix is unknown, the play space requirement can be secured by Legal Agreement on submission of the reserved matters. The Design Code has been amended to require the play space quantum to be London Plan compliant. The Section 106 is also 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.

#### Urban Greening Factor

- 9.181 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 full component provides a UGF of 0.34 while the wider outline component achieves a minimum score of 0.4. This would be achieved through a range of urban greening measures, woodland creation, new tree planting, rain gardens, green roofs, river edge planting and meanwhile greening.
- 9.182 The outline component aims to achieve a 0.4 Urban Greening Factor (UGF) by prioritising green infrastructure as a core design objective which could result in an uplift in the UGF when considering the full component overall. The Masterplan

incorporates extensive urban greening to enhance climate change resilience, boost ecological value, and deliver environmental and social benefits across the site.

- 9.183 The scheme outlines the landscape and public realm plan and is well-aligned to meet or exceed a UGF of 0.4, through integrated semi-natural planting, green roofs, permeable surfaces, and SuDS. Furthermore, the Design Code aims to achieve a 0.4 Urban Greening Factor (UGF) by prioritising green infrastructure as a core design objective. A formal area-based UGF calculation would confirm this and as such a planning condition can secure details on submission of the reserved matters as they come forward to support the goals.

## Environmental Issues

### Land Contamination

- 9.184 The Council's Environmental Health Officer has raised no objections in relation to any historical contaminated land issues. The Environment Agency has also been consulted and has confirmed that there are no objections to the proposals by way of environmental matters.
- 9.185 A Phase I Investigation (Desk study and site reconnaissance) has been undertaken with details submitted under the application. The Report identified that the main sources of contamination originate from the current use of the land given the history of the site and various contemporary trading activities, many of which are potentially contaminative. Of particular note are:

Example of Contaminant Source	Effect
Cabinet works located at 13 Bridge Close	Potential contaminants such as metals, inorganic compounds, acids, asbestos, polychlorinated biphenyls (PCBs), solvents, hydrocarbons, dioxins and furans, and timber preservatives (organometals) .
Electricity substations	They typically included both transformers and capacitors recorded in the northern quadrant of the site from around 1960. Although PCBs were used historically in these devices, the risk of significant contamination from this source is considered low as the use of PCBs in transformers ceased in the late 1970s.
Tank Records	A tank recorded in the north of the site since around 1980 poses a potential risk for chemical contamination due to possible spills or faults in maintenance.
Historical Pollution Incidents	There are records of pollution incidents affecting the nearby River Rom, including

	the spillage of oils classified as a minor incident in September 1993.
Site History and Trading Activities	There are records of pollution incidents affecting the nearby River Rom, including the spillage of oils classified as a minor incident in September 1993. This adds to the potential sources of contamination.

9.186 It should also be noted that the site is previously developed land and inevitably remediation and contamination works would be required to secure the site for future residential use. This has been reviewed by the Council's Environmental Health officer who recommended conditions seeking a remediation strategy and verification report which can be secured.

#### Air Quality

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

#### Noise

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

#### **Sustainable Waste Management**

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

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

#### Circular Economy

9.190 The applicant has submitted a Circular Economy Statement in accordance with the GLA guidance.

#### Waste Management

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

9.192 The Council's Street Management in charge of waste management have reviewed the proposed waste strategy for both the residential and commercial aspects of the development, the collection of bins and storage facilities which are to be provided in communal stores and secure storage stores located across the ground floor of the site and use of URS. It is considered to be satisfactory subject to imposition of relevant conditions in the case of an approval. Overall, it is considered that the proposed development will provides a suitable waste strategy that meets the requirements of the London and Local Plans.

#### **Accessibility and Inclusivity**

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



- 9.194 Further, Policy D7 of the London Plan seeks all new homes to meet the Building Regulations M4(2) standard for 'Accessible and adaptable dwellings' and 10% of the dwellings shall be designed to meet the M4(3) standard for 'Wheelchair user dwellings'. With regards to the detailed application, details submitted with the application demonstrate that the development would meet the above requirements. As for the outline application, full details of site levels and designs of individual buildings are not before the Council for consideration at this stage. However, it is anticipated that the residents units would still achieve Building Regulation compliance.
- 9.195 Accessible site levels for the public realm should be able to be created and a planning condition is therefore recommended to ensure that an accessibility scheme is provided with each reserved matter application. It is also recommended that a condition is imposed to ensure that all dwellings comply with Policy D7 of the London Plan on Accessible housing with 10% of dwellings meeting Part M4(3) 'wheelchair users dwellings' compliance. Applicable conditions would be imposed in the case of an approval.

### **Secure by Design**

- 9.196 Detailed drawings of building design and layout are not before the Council for consideration at this stage. However, it is necessary to consider the extent to which the submitted Parameter Plans and Design Code deal with secured by design issues.
- 9.197 The majority of the site would be developed in a block structure, which is typical of how the regeneration of the wider area will be brought forward. The design strategy emphasises active frontages with clear legible entrances, which could have audio and visual control allowing for visibility and safety. Lower ground floors has evolved in response to the Met Police comments about separation and sub-division of cycle parking where there is self-contained cycle parking for both Buildings A1 and A2. Within each area, the cycle parking is arranged into smaller clusters of parking, with the potential for these to be separately secured and fob-accessed. Associated landscaping and public realm to have tree canopies at 2m or higher to maintain good sight lines at ground level.
- 9.198 In terms of the outline component it was acknowledged by the Met Police that the site as a result of the proposals will become a lot more permeable and legible than currently which will help with passive surveillance. The Design Code includes stipulations that buildings with active frontages should positively respond to any adjacent open space enhancing the public realm. The illustrative masterplan indicates that an acceptable residential and mixed-use layout can be provided in terms of natural surveillance of streets, spaces and parking courtyards. Further consideration of the wider site will normally be given to this issue at reserved matters stage.

9.199 In keeping with these policies officers have consulted the Metropolitan Police's Designing Out Crime team to review the submitted application. They have commented that the application is acceptable subject to conditions stipulating that prior to the commencement of development the applicant shall be required to make a full and detailed application for the Secured by Design award scheme and thereafter adhere to the agreed details following approval.

9.200 A request for detailed information relating to Secured by Design measures is to be secured by condition in the case of an approval, including measures to ensure that the public open spaces, including they are adequately lit and further consideration of the layout of these spaces will be undertaken on consideration of any reserved matters applications. It is therefore considered that an acceptable arrangement would likely to be provided throughout the scheme.

### **Financial and Other Mitigation**

9.201 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.

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

- 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.
- The London Borough of Havering's CIL was adopted in September 2019. Open market residential development will attract a levy of £125 per sqm of net additional floor space. If approved, the proposed development would be subject to (CIL) applied at a rate of £125 per square metre of additional gross floor area.

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

Planning obligation	Monetary contribution
Mayoral CIL	£5,170,000
Borough CIL	£10,390,000

## Equalities

9.204 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.

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

9.206 In light of the statutory obligations under the Equality Act 2010, the London Plan, and Havering’s own Local Plan, Havering Council has demonstrated an awareness of its statutory duty to religious groups by acknowledging the importance of the Havering Islamic and Cultural Centre (HICC) as a valued community asset. The Council has engaged in ongoing dialogue with HICC and the applicant, and has supported the exploration of both on-site and off-site reprovion options. While concerns remain about the adequacy and certainty of these proposals, the Council’s recognition of HICC’s needs, its inclusion of flexible community use classes in the planning framework, and its stated commitment to inclusive design and social cohesion reflect a positive step toward fulfilling its statutory responsibilities. Continued collaboration and a firm commitment to securing a viable, uninterrupted reprovion will be essential to fully meeting the Council’s duty to protect and promote the rights of faith-based communities.

9.207 The policy context in the Havering Local Plan in the subtext to the relevant Policy 16 ‘Social Infrastructure’ includes the expectation of what reprovion of social infrastructure means: “...The Council will , however, not permit proposals which would result in the loss of social infrastructure in an area of defined need for that type of social infrastructure without a convincing demonstration by the developer that equivalent replacement (in terms of size, usefulness, attractiveness, safety and quality) has been made”. The current HICC building is not purpose built for its

function, it is a dated building built for light industrial purposes on two floors, without step free access to the first floor. The planning consultants acting for HICC in their objection letter of July 2025, acknowledges that the applicant has met with HICC on 25 occasions to discuss their requirements. What is being proposed as an on-site community use would provide more floorspace than does the current HICC facility. It would provide step free access to all floorspace. The Equality Act 2010 which is the basis of the Public Sector Equality Duty includes disability as a protected characteristic. Protection from discrimination on the grounds of disability now falls under the Equality Act 2010. Amongst other things a public authority in exercise of its functions must have due regard to the elimination of discrimination and under section 149(1)(b) have due regard to "...advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it". The proposed on-site reprovision will be step free in contrast to the current facility and will advance equality of opportunity by facilitating access to all of the reprovision floorspace thus addressing discrimination on grounds of disability.

- 9.208 The duty (Public Sector Equality Duty) does not dictate a particular outcome. The public authority is not duty bound to achieve a certain outcome. The obligation in Section 149 of the Equality Act 2010 is to have "due regard". The level of "due regard" considered sufficient in any particular context depends on the facts. In this context the policy requirement is to consider what amounts to a realistic proposal for reprovision. The duty should be applied in a proportionate way and be fully cognisant of any impacts on those with protected characteristics.
- 9.209 Planning consultants acting for HICC also assert that the proposal would engage Article 1 of the First Protocol of the European Convention on Human Rights, which protects the right to peaceful enjoyment of possessions. It is not immediately clear how a planning permission which conveys no property interest and is simply a regulatory permission would in this circumstance in which HICC hold title to their premises affect the peaceful enjoyment of those premises. It gives no right to any party to interfere with the HICC premises and the use of those premises. In any event Article 1 is not an absolute right it is a qualified right, which means that while it protects an individual's property from unjustified interference with their property, it allows for certain limitations when deemed necessary in the public interest. Planning decisions may involve, as in this instance, balancing the rights of landowners with the broader public interest, such as addressing the housing shortage, environmental protection, infrastructure development and discharging the Public Sector Equality Duty.
- 9.210 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.

## **10.0 PLANNING BALANCE AND CONCLUSION**

- 10.1 In assessing the planning balance for the Bridge Close redevelopment, the proposal must be considered against the development plan and other material considerations, including the National Planning Policy Framework (NPPF). The Council's housing land supply currently stands below the required 5-year threshold —triggering the “tilted balance” in favour of sustainable residential development. This means that unless adverse impacts significantly outweigh the benefits, planning permission should be granted.
- 10.2 The scheme demonstrates strong alignment with the three dimensions of sustainable development outlined in the NPPF: economic, social, and environmental. Economically, the development will contribute to growth through construction-related employment and increased local spending, with moderate weight given to these benefits. Socially, 35% of the site will provide affordable housing, a significant number of family-sized units. These provisions directly address urgent housing needs in the borough and are afforded substantial weight. The inclusion of open space and community infrastructure further supports the creation of sustainable communities.
- 10.3 Environmentally, the site is not designated for nature conservation, and ecological impacts can be mitigated through conditions. The scheme retains key trees and secures biodiversity net gain, while the design enhances the built environment and public realm. Although there will be some loss of daylight and outlook for neighbouring properties—the overall impact is not considered so severe as to outweigh the wider public benefits.
- 10.4 Given the above with regard to the outline application, a condition is recommended restricting the maximum number of dwellings to 1070. The maximum number achievable may be less subject to detailed consideration of the reserved matters and requirement to achieve an acceptable mix of unit sizes and types, good standards of residential quality for future occupiers and acceptable amenity impacts to neighbouring properties. In conclusion, it is considered that the imposition of this condition would be an acceptable way to ensure future quality in the outline phases is secured.
- 10.5 Whilst some elements of the proposals are not, in isolation, supported by the policy framework, having regard to the significant, economic and regeneration benefits derived through the development, the potential environmental and physical effects of the development (and their scope for mitigation) and the provisions of the NPPF and the adopted Local Plan, the proposals are nevertheless considered to represent a viable, and on balance acceptable form of development. Subject to the appropriate referral of these proposals to the Mayor of London, the proposed planning conditions and the prior completion of a S.106 agreement, the application is recommended accordingly for approval.